

ETHICAL CODE

LM Team S.r.l. bases its activity on the professional competences of involved human resources and on the constant attention to customer's needs.

It is as well important the sharing of our values, which are pursued and safeguarded by our personnel and Associates.

This **Ethical Code** describes the operational rules that derive from those principles and the norms that aim at preventing all behaviors that do not comply with our values. Everybody is expected to adhere to these norms of personal conduct, as this represents a fundamental aspect to ensure and preserve the effectiveness of our company's business.

Contents

GENERAL PRINCIPLES	2
SUBJECTS OF THE ETHICAL CODE	2
ETHICAL VALUES OF LM TEAM S.r.l.	3
Professionalism	3
Loyalty and propriety.....	3
Transparency	3
Legality	3
Impartiality.....	3
Prudence	3
Strategic value of human resources	3
Innovation	3
CUSTOMER RELATIONSHIPS	3
RELATIONSHIPS WITH SUPPLIERS AND EXTERNAL COLLABORATORS.....	4
BEHAVIORAL PRINCIPLES	4
IMPLEMENTATION OF THE ETHICAL CODE	6
MEASURES ADOPTED FOR THE PURPOSE OF CODE OBSERVANCE	6
SANCTION PROVISIONS	7

GENERAL PRINCIPLES

This **Ethical Code** is adopted in full respect of the principles of integrity, transparency, legality, fairness and prudence and in full respect of all applicable norms, with the goal of adopting appropriate ethical standards of conduct.

LM Team S.r.l. has the following activities as its business purpose:

- *Provision of consulting services on ICT, organizations, computer and telecommunications engineering, design of data transmission and storage systems, installation of hardware, operating system and applications, including audio communication, telephony, videoconferencing, video recording, wide area and local connectivity and software development for system management.*
- *Provision of organizational consulting in business and professional domains, such as contract management, legal auditing, preparation and registration of brands and patents, data protection compliance, relationships with personnel, customer, suppliers and public offices.*
- *Technical and legal consulting aimed at the adoption of management systems for quality, environment, health & safety, UNI and ISO standards, organizational models, also in accordance with Italian D.Lgs. 231/01, anti-corruption and anti-money laundering systems, whistleblowing, assistance to surveillance bodies, assistance on obligations related to health and safety on workplaces, as per Italian D.Lgs. 81/2008 and its subsequent modifications, as for example external RSPD service, training, assistance in redaction of DVR, DUVRI, safety plans and related documents.*
- *Personalization of third-party IT tools, need analysis, employee training, as well as training on technology usage in industry, service sector and agriculture production domains.*
- *Provision of IT systems, including hardware, software, operating system, licenses and cloud services.*
- *Design and management of web sites and the configuration of web systems.*

By shaping its activity on the principles described in this Code, our Company operates on the firm belief that business management requires ethical values to be cohesive with the economic goals set in the company's charter.

With the adoption of this Code, **LM Team S.r.l.** puts at the center of its objectives the legitimate expectations of all subjects that have a personal, work or business relationship with the company. All relationships with those subjects must be shaped by principles of legitimacy, honesty, collaboration, transparency, fairness and mutual respect. This **Ethical Code** aims at creating fair collaboration relationships and represents an important instrument, adopted with the purpose of establishing a company code of conduct which all involved subjects must adhere to, regardless of the nature of the ongoing relationship.

This Code lists duties, rights and responsibilities of the company towards employees, suppliers, customers, partners, etc. and of those same subjects towards **LM Team S.r.l.**

The Code aims at recommending, promoting or prohibiting given behaviors, in connection with the principles described in the following, which every company conduct must be inspired to.

The Code has been designed with the goal of transferring ethical values into behavioral principles. Those principles are all together essential to prevent illegal acts foreseen by Italian D.Lgs. 231/2001 and represent an integral part of the company organizational, management and control Model.

The norms set by the Ethical Code are therefore an essential part of the contractual obligations.

SUBJECTS OF THE ETHICAL CODE

Following individuals are subjects of this Ethical Code and are bound to respect its contents:

- all Administrators of Company;
- all internal Collaborators of the Company;
- all external Collaborators of the Company, as well as all Consultants who perform support activities at the advantage of our Company, either due to explicit acceptance or because of specific contractual clauses;

Subjects are requested to:

- behave in compliance with Ethical Code prescriptions;
- immediately inform the Company in case of possible Code violations;

- request all needed interpretations or clarifications about the conduct principles to be followed, as defined here below.

ETHICAL VALUES OF LM TEAM S.r.l.

In the pursuit of its business goals, the Company is inspired by following values, which are to be considered by all Subjects as fully binding:

Professionalism

Subjects behave in a responsible and professional manner in order to resolve all situations where potential conflicts can arise, ensuring that their conduct is driven by honesty, morality and fairness. No decisions shall be taken and no activities shall be executed that are against Company interests or that are incompatible with office duties.

Loyalty and propriety

LM Team S.r.l. firmly believes that it is fundamental to act with professionalism, applying loyalty and propriety in all relationships within and outside the Company.

Transparency

Subjects have transparent relationships with their counterparts, committing to provide clear, complete, timely and accurate information. It is important to accept other viewpoints and be available to mutually exchange all suitable information at all levels of the organization.

Legality

Subjects adapt their behavior to fully respect internal procedures and applicable laws. Their acts must be always inspired by legality, as they become reference models for all collaborators.

Impartiality

Subjects always act with full respect for the personal characteristics of everyone, respecting diversity and rejecting all possible discrimination based on age, health, gender, religion, ethnicity, political and cultural opinions, as well as personal and social condition. Company commits to develop skills and competences, pursuing an approach based on equal opportunities and merits, considering professionalism a fundamental condition to reach its objectives.

Prudence

Subjects act with full awareness of all risks and aiming at their appropriate management. This value leads to careful actions, especially when own actions and decisions may result in a damage to people or things.

Strategic value of human resources

Human resources are the main asset of the Company. Full involvement of human resources at all levels, in “teamwork” and in objective setting, allows the Company to always set itself available to serve the customer, committing to ensure service efficiency and fulfillment of promised requirements.

Innovation

LM Team S.r.l. is constantly looking for new solutions for its products / services / processes. Goal is to identify opportunities to improve existing processes and systems.

CUSTOMER RELATIONSHIPS

LM Team S.r.l. bases its product and service offering on constant innovation, with the goal of satisfying customer’s requests through a prompt and competent response, with behaviors driven by honesty, courtesy and the greatest collaboration. Subjects must commit to respect Customers’ needs, avoiding to promote or favor own interests and take advantage.

RELATIONSHIPS WITH SUPPLIERS AND EXTERNAL COLLABORATORS

Suppliers and external collaborators cover a fundamental role in improving overall company competitiveness. All relationships with suppliers and external collaborators are driven by loyalty, impartiality and respect. **LM Team S.r.l.** request that its suppliers and external collaborators respect the principles and provisions set by this Code.

BEHAVIORAL PRINCIPLES

Subjects are expected to respect the principles and prescriptions set in this Code. **Integrity, transparency, honesty and fairness** are essential to Company activity. More in details, **LM Team S.r.l.:**

- Pursues **excellence** and **competitiveness**, offering to its Customers quality products and services, which will effectively address their needs.
- Ensures **full transparency** in its operations, at the same time respecting all confidentiality requirements needed for proper business management and to safeguard competitiveness of Company's offering.
- Ensures **greatest confidentiality** on all information gathered or processed while carrying out its business activities.
- Prohibits the adoption of any illegal or anyway unfair behavior in order to achieve business objectives.
- **Preserves and values** all human resources.
- Pursues **respect of equal opportunities principle** on workplace, rejecting any discrimination based on gender, marital status, sexual orientation, faith, political or labor union opinion, skin color, ethnicity, nationality, age, diverse ability condition.

LM Team S.r.l. acknowledges the pivotal role of human resources, under the belief that the main success factor for a company is the professional contribution of people operating there, in a mutual fairness and trust framework. The Company commits to preserve personnel moral integrity, preventing that individuals are subject to unlawful conditioning or undue distress. Neither psychological violence acts, nor attitude or behaviors that are discriminatory or detrimental for the individual, his or her beliefs and preferences are tolerated.

All Subjects must interact with contractors, suppliers and partner in full compliance with the ethical values of **LM Team S.r.l.**

In all cases where this is deemed to be relevant, Subjects must ascertain that contractors, suppliers and partners formally accept the commitment to respect the **Ethical Code** and operate in compliance with all its prescriptions, fully respect regulation on health and safety in the workplace and do not apply in any manner unlawful methods and work practices.

In all relationships with Public Offices, the relationships of the Company with local, national, EU or international entities are maintained by the Subjects in full respect of all applicable laws and based on the ethical values of the Company.

When applying for contributions or subsidies, when participating in public tenders or bids and generally when requesting any service or grant from Public Offices, the Company intends to operate with the greatest transparency and integrity.

While processing confidential information, Subjects that should come to know confidential or privileged data or information commit, in application of the values of integrity, transparency, legality and impartiality, to:

- respect applicable norms about protection and processing of personal data;
- refrain from taking any action by exploiting confidential information in order to take personal benefit;

- undertake actions or businesses in competition with those run by the Company.

Subjects commit to adapt their conduct so that the distribution of documents related to confidential information is managed in a careful and attentive manner, in order to avoid detriment for the Company and undue disclosures. All information that is not of public domain must be regarded as confidential and must be utilized solely for the purpose of executing Subjects' work activity. Subjects are not allowed to consult or utilize confidential data for purposes not linked to their profession.

In its accounting activities and in communicating economical, property and financial information the Company strives to maintain a reliable administrative and accounting system in order to process and publish accurate and complete economical and financial data, so that a clear, truthful and accurate representation of business management facts can be provided, in application of integrity, transparency, legality and prudence values.

Subjects must timely inform in writing about any potential conflict of interest situation, to allow appropriate verifications and the definition of possibly needed intervention.

Administrators must inform the Administration Body about any potential conflict of interest situation and must avoid participating in any related deliberation.

Subjects are prohibited to utilize company instruments and resources for purposes that are unlawful or not in agreement with the principles of the Code. Each Subject, in the fulfillment of legality and prudence values, is responsible for the protection and the preservation of all company goods, either material and immaterial, assigned him/her to execute his/her duties, as well as for the utilization of those goods in a manner that is appropriate and compliant with company goals.

The Company will strive to achieve excellent quality levels in **workplace health and safety and environment protection**, putting special attention to work health and safety matters as well as to environment safeguard. With respect to work health and safety, these are the principles and fundamental criteria the drive all decisions, of any type and at any level:

- avoid risks;
- evaluate risks that cannot be avoided;
- minimize all unavoidable risks;
- adapt individual work practice, with respect to task assignment and choice of tools and work methods;
- replace whenever possible what is dangerous;
- program risk prevention, making available a coherent set of resources, directed to the safeguard of all subjects that execute their work tasks within or on behalf of **LM Team S.r.l.**;
- provide collaborators with appropriate training and instructions, drawing their attention on the respect of all legal and technical norms regarding their own health as well as that of any other individual they are in contact with while executing their tasks.

Subjects commit to:

- operate with the highest diligence in order to safeguard the health and safety of all personnel present on the workplace, in agreement with their own training;
- notify possible anomalies and/or malfunctioning noticed during the usage of work tools.

IMPLEMENTATION OF THE ETHICAL CODE

The Ethical Code is adopted following the approval of the Board of Directors of the Company.

Each update to the Code will be adopted with a subsequent deliberation, due to possible organizational changes, as well as in connection with the experience gathered over the time. Subjects of the Code are expected to contribute to the continuous improvement of the internal control system.

Internal control system

The Company promotes a positive attitude towards the controls performed by Company Bodies, in view of the contribution to efficiency improvement.

In that respect, the Company aims at:

- ✓ favouring the integration of ethical values and behaviours in company decision processes;
- ✓ monitoring the compliance of actions and behaviours with the code of conduct;
- ✓ suggesting the review of company procedures in view of the Ethical Code;
- ✓ clarifying, by means of advisory opinions, the meaning and the application of the Code;
- ✓ establishing and spreading the operational practices needed to communicate possible violations to Ethical Code contents;
- ✓ examining received violation notices, promoting most suitable verifications;
- ✓ protecting all individuals that notify incorrect behaviours;
- ✓ communicating verification results to relevant company offices for the adoption of appropriate measures;
- ✓ defining communication and training programs to achieve optimal knowledge of Ethical Code contents and objectives;
- ✓ verifying possible needs for modifications or additions to the Ethical Code proposed by collaborators.

MEASURES ADOPTED FOR THE PURPOSE OF CODE OBSERVANCE

The Board of Directors examines notices of violation to this Ethical Code and of company rules.

Subjects of the Code must notify to the Board of Directors:

- any violation or suspect of violation to the organizational, management and control model and/or to the Ethical Code and the code of conduct; notices can be submitted with means that best preserve the confidentiality of the author's identity, also anonymously;
- provisions and/or communications coming from judiciary police or any other authority, which he/she officially becomes aware of, concerning unlawful acts or alleged crimes as per Italian D.Lgs. 231/2001 with risks of impact on Company's business.

SANCTION PROVISIONS

LM Team S.r.l. commits to adopt procedures, operating rules and instructions so that the values hereby stated are reflected in the acts and behaviors of the Company and of its collaborators.

The provisions set in this Code are an integral part of the contractual obligations undertaken by the Subjects and by those that have business relationships with the Company.

The infringement of the principles and the contents of the Code may represent non-fulfillment of the primary obligations of the employment and/or contractual relationship, with possible sanctions as foreseen by laws, collective agreements, contracts, and bearing all legal consequences, also with respect to possible compensation for suffered damages.

Ascertained violations of the provisions set by this Code causes the infliction of sanctions proportioned to the seriousness of the violation to each norm.

In case of violation the Company will evaluate concerned facts and behaviors and will take appropriate actions towards responsible people, in agreement with law provisions, taking into consideration that such violations represent non-fulfillment of the contractual obligations deriving from professional work relationship. In the case of violations committed by Collaborators or external Consultants, the Company will proceed, in most serious cases, to dissolve the contractual relationship, without prejudice to any possible request for compensation of suffered damages, also independently from contractual relationship dissolution.

Whoever gets to know behaviors not compliant with the Ethical Code or violations of the same committed by any individual that has relationships with the Company is bound to promptly inform Company Direction, in writing and not anonymously. Confidentiality of the originator of the information is ensured, without prejudice to the obligations set by the law.

The Ethical Code is available in electronic and paper format at the office of **LM TEAM S.r.l.**

LM Team S.r.l.
(C.E.O.)

