

# CODE OF ETHICS



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***“We shape a new world bringing  
the present closer to the future  
to improve people’s experience  
today and tomorrow”.***



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# OUR MISSION



**We are a Development, Engineering and Construction Company.**

**We concretely support a just urbanistic development,  
with the objective of efficient, rational and sustainable use of  
resources,  
to improve people's experience and wellness today and tomorrow.**

**Our work is based on passion and innovation,  
on the equal dignity of each person,  
on our unique strength and skills,  
recognizing diversity as a key value for human development,  
through responsibility, integrity, and transparency of our actions.**

**We believe in the value of long-term partnerships  
with the Stakeholders with we cooperate with,  
bringing long-last prosperity for all**

The United Nations 2030 Agenda for Sustainable Development, presented in September 2015, identifies 17 Sustainable Development Goals (SDGs) that represent common objectives of sustainable development in today's complex social challenges. These objectives constitute an important reference for Techbau in conducting its activities within the context in which it operates.



# OUR VALUES

Our values tell who we are and what we believe in, guide our actions, define our commitment, and orient both our behaviours and that of our stakeholders.

## INTEGRITY

We carry out our daily activities with responsibility, equity, fairness and good faith, respecting our guiding Principles besides internal and external regulations.

## TRUST

We are attentive to the needs and expectations of our stakeholders. We are committed to be engaged in continuous dialogue with our counterparts, providing them clear, complete, and truthful information, being aware that sharing objectives and results is essential to maximize value and reduce business risks.

## PROTECTION OF HUMAN RIGHTS

We operate with respect for Human Dignity and Human Rights, and we require the same commitment from all our Partners. We ensure an inclusive work environment that values uniqueness and diversity as fundamental resources for the development of our People.

## TEAMWORK

We work with passion, believe in team spirit and value everyone's skills. We recognize collaboration as a foundational element to building solid and lasting relationships, through which we can express our potential and achieve Corporate objectives.

## DEVELOPMENT

We work to support an efficient and sustainable use of resources that protects the welfare of future generations, the protection of environment, and the needs of society as a whole.

## INNOVATION

We believe that innovation is at the basis of personal and business growth. We are committed to acquiring cutting-edge technological skills in order to develop innovative ideas and improve our daily activities, contributing to improvement of the people's experience by increasing safety conditions and reducing environmental impact.

## OPERATIONAL EXCELLENCE

We guarantee the efficiency and integration of our activities, minimizing risks and creating opportunities along the entire value cycle.



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# OUR RESPONSIBILITY

Techbau's Code of Ethics (Our Code / the Code), inspired by the ideal of cooperation amongst people, respects the individual and constitutes a guide in decision-making and action-taking that are consistent with our culture of responsibility, legality, transparency, long-term value creation for all our stakeholders, and finally, perhaps most importantly, legality also understood in its organisational sense ( "Compliance"), by contributing to sustainable development.

For this reason, Our Code represents the yardstick by which Techbau sets out and clarifies its ethical and social responsibilities and commitments, also in light of the provisions introduced by the most significant regulatory references in the corporate compliance panorama, namely Legislative Decree No. 231 of 8 June 2001 on the administrative liability of Companies.

In accordance with Legislative Decree 231/01, Our Code constitutes a prerequisite and reference within the internal control system aimed at preventing offences, together with the operational prescriptions contained in the Management and Control Organisational Model (the "MOG") adopted by Techbau and of which Our Code is an integral part.

Verification of the application and effective implementation of the MOG and Our Code is entrusted to a body - the Compliance Body - to which reports of conduct considered to be in breach of the principles and values set out in Our Code may also be addressed, in accordance with the procedures duly notified and, in any case, indicated in the MOG.

Our Code is a guide designed to help all our employees ("Techbau Employees") and all our subcontractors, suppliers, and consultants ("Techbau Partners") acting on behalf of Techbau to connect with our values and provide expectations for our everyday behaviour.

As Techbau Employees and Techbau Partners, we must all read carefully, understand, comply, and fully adhere with our Code.



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# WHY DO WE NEED A CODE OF ETHICS

As Techbau Employees and Techbau Partners, the communities in which we conduct our business operations are all affected by our actions, and benefit when we do the right thing. Without guiding principles, it is not easy to always know how to identify the right path to take, or, when we identify it, to follow it. This is why we need guiding principles.

The Code is where we find direction on how interact with each other, our clients, the communities in which we work and with other stakeholders in our daily work. It is the place to start when we face an ethical dilemma, and it provides information on whom to contact when we have questions or concerns.

We seek to create an environment that promotes values, adheres to and rewards ethical conduct as practiced by all members of our workforce resulting in a cooperative working environment in which the dignity of each individual is respected.

Our Code aims to ensure that all Techbau Employees and Techbau Partners act with the highest level of integrity, comply with applicable laws and build a better future for our Company, the stakeholders which we do business with and the people expected to live in our buildings.

Understanding, adopting, and disseminating Our Code not only strengthens our values expressed in principles, commitments and behaviours, but also helps to guide Techbau's strategic mission as a leading Development, Engineering and Construction Company.

Our integrity system sets the foundation for the Corporate governance of Techbau and includes a critical framework of Principles and Procedure that combine our experience, up to date research of applicable legal requirements and best practices as well as benchmarking on ethics and compliance.

Under no circumstances acting in favour or in the interest of the Company may even partially justify behaving in conflict with the principles and contents of our Code.



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# WHO IS GOVERNED BY THE CODE OF ETHICS?

Our Code is a guide designed to help you when connecting with our values and provide expectations for our everyday behaviour.

This Code extends beyond Techbau as people and companies conducting business on our behalf are essential to the work we carry out. Subcontractors, suppliers and consultants acting on behalf of the Company shall follow the sections of this Code applicable to them. Applicable provisions of this Code are furthermore included in the contracts with Techbau Partners.

Whenever and wherever you are working on behalf of Techbau, or are interacting with others in Techbau community, you must abide by the Code.

You must be aware that your behaviour represents Techbau, even outside of work hours if your activity involves representing or appearing to represent Techbau, to the extent permitted by local law. Your conduct affects both the external reputation of the Company and its internal culture.

While no document can possibly take into account all the particular ethical and legal dilemmas that you may encounter in the course of your work, Our Code provides guidance that is meant to keep you on the right course, and to alert you when further guidance for individual situations may be necessary to fully adhere to the principles of the Code, as well as to applicable laws and regulations.

We take responsibility for knowing and respecting the principles and contents of our Code, and the regulatory instruments used to clearly communicate and regulate our activities. Techbau's leadership is committed to guarantee the principles and contents of Our Code by always setting the example, taking responsibility both internally and externally, and strengthening trust, cohesion, and the spirit of the group



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# WHAT ARE YOUR RESPONSIBILITIES?

We are strongly convinced that, before being Techbau Employees or Techbau Partners, all of us are People, regardless of job responsibilities, title, or function; therefore, you shall act as a role model for your co-workers, clients, and any other stakeholders you are encountering in your everyday work.

You are expected to not only know and follow the Code; you are strongly encouraged to uphold the Code by promptly reporting activities that are not within the letter and the spirit of the Code, whether or not the conduct in question involves a violation of the law. You are also expected to take quick and decisive action to address violations of our Code, ask questions and seek guidance. If you feel your concerns are not being adequately resolved or responded to in a timely manner, continue to press the issue and if necessary, use one of the other channels for reporting a concern.

All workforce members are expected to treat others as they themselves expect to be treated, including customers and other external persons doing business with the Company.

You may be required periodically to certify your understanding of, and adherence to, the Code or any specific Principle, Practice or Procedure. If required, such certification is mandatory. You will be asked to complete mandatory Code training and you may be required to periodically certify your understanding of, and adherence to, the Code by which you reaffirm your commitment to comply with the Code and confirm your compliance with the Code.

# WHAT ARE OUR EXPETATIONS?

We are committed, as Techbau, to ensuring legality, transparency, fairness and honesty in all our activities and creating long-term value for all our stakeholders. Therefore, we expect our stakeholders to equally adopt socially responsible behaviour and develop adequate ethical programs and safeguards, consistent with the principles and behaviours presented in Our Code of Ethics.

## WHAT TO DO IN UNCERTAIN CIRCUMSTANCES:

Given the complexity and fast pace in today's workplace, you may encounter situations that appear unethical. Familiarity with Our Code is crucial as it can help guide your actions when you are confronted with such situations. While Our Code contains an overview of important conduct and examples, you may experience a particular factual situation for which you believe our Code's guidance is not sufficiently clear or applicable

## IF YOU ENCOUNTER A DIFFICULT SITUATION, ASK YOURSELF THE FOLLOWING QUESTIONS:

- Is what I am doing allowed?
- What are the potential consequences of my actions?
- Is this fair and ethical?
- Does this reflect our values, our culture and our commitment to our employees, clients, partners, communities, and other stakeholders?
- Is this permissible under internal policies?
- Would I be comfortable if my actions were made public?
- Would I approve this situation if I were a client or a shareholder?

Use your best judgment and common sense. If you can't answer "Yes" to each question, or if you have a doubt about the legitimacy of your action, you must stop and ask for advice through the most appropriate channel.

Expressing doubts and asking questions helps manage situations correctly and resolve potential problems. If you have any questions as to how to apply the Code in a certain situation, you may contact



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# WHO IS YOUR REFERENCE?

## YOUR DIRECT LEADER

Can your manager answer our questions?

## OTHER LEADERS

Can another manager answer our questions?

## THE COMPLIANCE BODY

If we don't know where to turn, the Compliance Body is your "go to" in case of doubts on the interpretation of the Code.

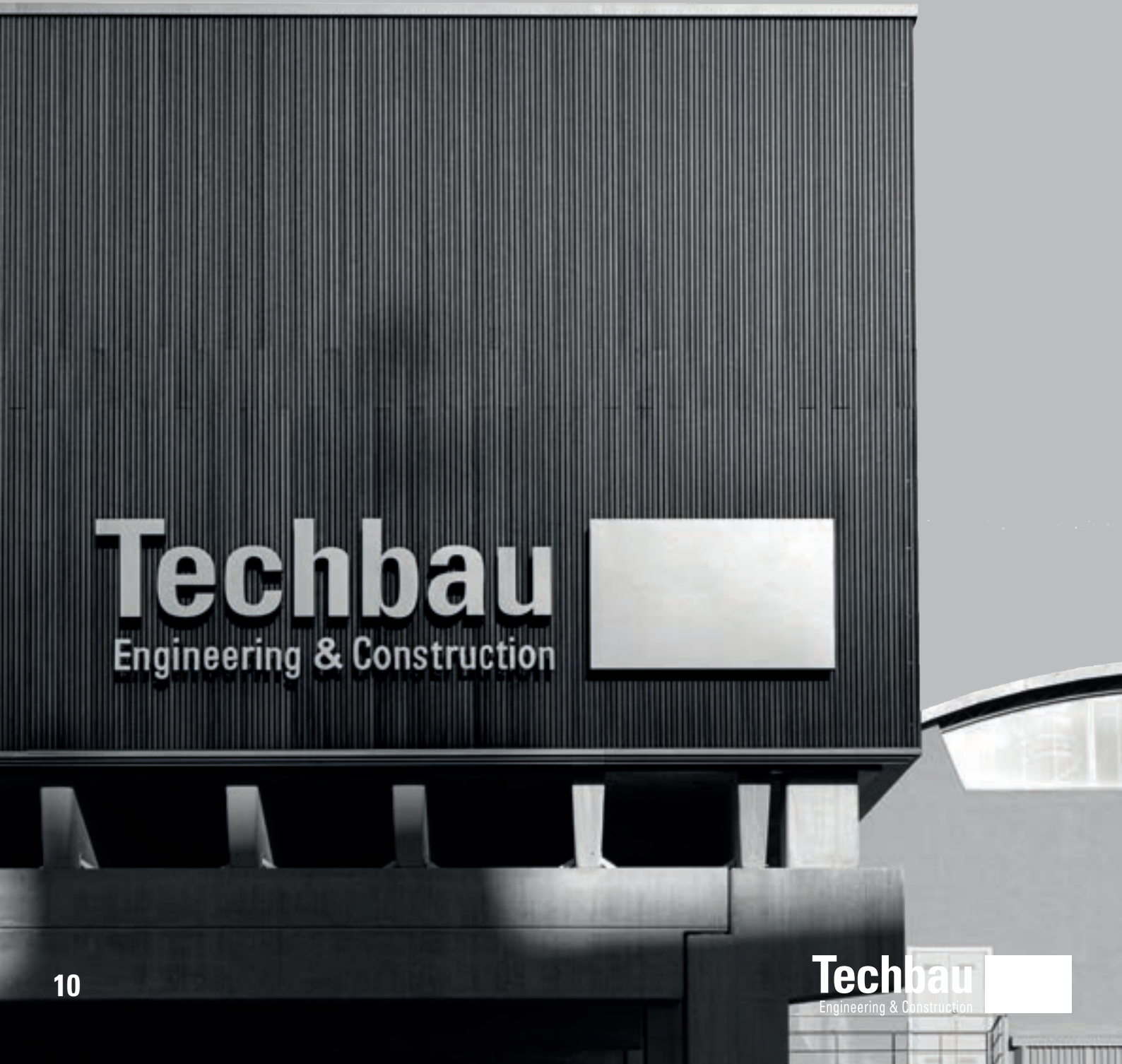


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## CAN THE CODE OF ETHICS BE MODIFIED?

The Code changes along the time, as it is subject to periodic review. Reviews take into account, among others, comments and suggestions received from Techbau Employees, Techbau Partners, and from third parties, changes in law or best practices, as well as experience acquired in applying the Code itself.

Any modifications introduced in the Code as a result of this review activity are promptly published and made available in accordance with applicable laws and regulations.

A large, modern building with a dark, vertically-ribbed facade. The Techbau logo is prominently displayed on the lower part of the facade. The logo consists of the word "Techbau" in a large, bold, sans-serif font, with "Engineering & Construction" in a smaller font below it. To the right of the text is a white square graphic element.

**Techbau**  
Engineering & Construction

# PEOPLE

We consider people the starting point and the goal of all our actions. For this reason, we work hard to guarantee the health, safety, and security of each individual. Every day, we strive to build a work environment free of discrimination and harassment, based on dignified working conditions, open dialogue, and the enhancement of diversity, aware that dedication and team spirit are fundamental elements to achieving operational excellence. We are committed to developing talent and investing in the potential of our collaborators, supporting and spreading the culture of innovation and change.

**Techbau**  
Engineering & Construction

**Techbau**  
Engineering & Construction



# PROMOTING HEALTH, SAFETY AND SECURITY



**We are committed to providing all our people with a safe and productive work environment. We recognize health and safety in the workplace as a key element of our sustainability approach.**

We aim for continuous improvement and empower all organizational levels to ensure a management approach based on the principles of precaution, prevention, protection, and risk management. We believe in and actively promote a culture of accident prevention and risk awareness among workers, through the provision of adequate training and information

We expect that you will share your commitment with us and promote awareness of compliance with all health and safety guidelines along with the preventive measures established for the protection of our Health and Safety. Irrespective of your role, you are asked to proactively intervene in an efficient manner to avoid unsafe situations and behaviours and to report unsafe working conditions, so that appropriate steps can be taken to protect ourselves, our co-workers, subcontractors, suppliers, clients, third parties, and others in the workplace.

The use of illicit drugs and alcohol can negatively affect job performance and cause severe safety hazards. Illicit drugs or alcohol use and abuse is strictly forbidden.

If you are found in possession of or under the influence of illicit drugs or alcohol at work, you may be subject to discipline and possible termination of your employment.

Carrying weapons or fake weapons into the workplace is strictly prohibited.

More specifically, you should work to promote fairness, and to ensure an environment free of discrimination and harassment in compliance with all applicable laws. You play a vital role in helping us create such a positive work environment. We expect you, and all members of our workforce, to cooperate in helping us reach these goals.

# PRESERVING A SMART WORK ENVIRONMENT



We are committed to maintaining a fair, secure, productive, and inclusive workplace for our people, one in which everyone is valued for her/his unique contributions to Techbau's growth and reputation.

Maintaining such an environment is essential to our success as a leading Development, Engineering and Construction Company. We can only achieve this goal if each and every member of our workforce takes personal responsibility for treating co-workers, customers, vendors and visitors with respect and professionalism.

More specifically, you should work to promote fairness, and to ensure an environment free of discrimination and harassment in compliance with all applicable laws. You play a vital role in helping us create such a positive work environment. We expect you, and all members of our workforce, to cooperate in helping us reach these goals.

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# VALUING PROFESSIONALISM OF OUR PEOPLE



**We value at all levels, as the skills fundamental of our people for, operational excellence.**

We promote the dissemination of knowledge, which enhances everyone's behaviours and contributions. We believe in the power of sharing, the exchange of ideas and comparison, to create the fundamental synergy that characterizes teamwork and gives rise to excellent result.

**We strongly believe in Education & Training as a tool to enrich our people, spread ethical values and strengthen a common Corporate identity.**

We are committed to hiring, developing, and retaining the most qualified individuals to promote and achieve our business objectives. In alignment with our core values, we hire and promote employees on the basis of ability, and reward on the basis of performance.

Performance evaluation and compensation for all members of our workforce is based upon a system that rewards merit and entrepreneurship: equity, meritocracy, personal care, and non-discrimination are fundamental elements of our compensation & benefits systems.

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# RECOGNIZING AND PROMOTE CULTURAL PLURALISM



We recognize that each employee's unique experiences, perspectives, and viewpoints strengthen our ability to create and deliver the best value to our clients and stakeholders. We consider plurality and diversity as sources of enrichment and resources for the development of humanity.

**We support organizational models that enhance cooperation amongst people with different skills perspectives and experiences.**

We are focused on creating a diverse and inclusive culture – one that unleashes creativity, fosters innovation, builds the best teams and drives value. We all contribute to maintaining and fostering a respectful, inclusive and healthy work environment without discrimination or harassment.

We promote and encourage mutual respect between people, at all levels, and do not tolerate unlawful discrimination against anyone including applicants, co-workers, subcontractors, suppliers, clients or anyone else we encounter in our work

We respect and value the exclusive contribution of each individual to our Company, committing ourselves to create an inclusive work environment that respects every individual's dignity and recognizes the power of differences.

We expect that you will share your commitment with us and adopt behaviours that convey and reinforce the values of diversity through measures (training, communication, behavioural, and operational) that contribute to an internal culture of active inclusion of all diversities avoiding and censoring any form of discrimination

# BUSINESS INTEGRITY |

**We are attentive to the needs and expectations of our stakeholders, with whom we establish transparent, fair and responsible relationships.**

**We build and maintain solid relationships with our suppliers and partners, based on the principles of fairness, legality, respect for Human Rights and protection of the environment and the communities in which we operate. We protect our customers and consumers by gaining their trust on a daily basis, behaving ethically, and offering the most innovative and the highest quality products and services.**

**We are committed to maintaining correct, transparent, and traceable relationships with authorities and institutions everywhere. Only by respecting the principles of responsibility and transparency we are able to protect the value for our shareholders and allow our Company to continue to grow and prosper.**



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# FOSTERING OUR EXCELLENCE



**We seek to satisfy our stakeholders' needs while keeping high quality, performance, and reliability levels. Clients' needs must be identified and satisfied by best using the Company's resources and synergies through a continuous constructive dialogue.**

Our dedication to quality, innovation and excellence runs deep, as we are committed to develop reliable, sustainable, and resilient constructions.

Failing to carefully plan and perform our day-to-day tasks to meet requirements can result in having to repeat the task. Beyond not satisfying our clients, this can cause schedule delays and impact the profitability of the business.

You are asked to be an essential promotor of this process, making it a primary objective of your job and delivering high-quality work and contributing to achieving the requirements and expectations of our clients, by also supporting the development of innovative processes and solutions.

To prevent quality issues, you must strive to execute with excellence the first time and to ensure the work you are performing meets or exceeds expectations.

Similarly, we must continuously seek to improve our processes and procedures, learn from our mistakes, and hold each other accountable for the quality of work completed.

Doing so protects Techbau's reputation and helps guarantee the Company's success.



# RELATIONS WITH CLIENTS, SUPPLIERS, AND PARTNERS



**We believe in business freedom and free competition, and we are inspired by principles of loyalty and fairness pursuing our success both by offering quality products and services at competitive conditions and by abiding by market principles when managing relationships with clients and suppliers.**

We share our values and integrity with our clients, suppliers and partners in order to build relationships based on maximum transparency. We base our contractual relations on fairness, transparency and equity, forbidding any exploitation of potential weaker contractual powers, or untruthfulness of facts and conditions to improperly influence clients, suppliers and partners during negotiations. Any action aimed at inducing our clients, suppliers and partners or their representatives to commit actions in breach of the law in force is forbidden.

In addition to proven professionalism, we require our suppliers and partners to commit and share our principles. We promote socially responsible behaviour, work practices, and expect our clients, suppliers and partners to operate in line with our high standards of respect for Human Rights and environmental protection. We are committed to acting on every occasion with equity, integrity and fairness, in compliance with our contractual commitments.

We expect your commitment to transparency, encouraging an equitable sharing of risks and opportunities. You are asked to cooperate at defining and disseminating policies, standards and rules that guide the action of our clients, suppliers and partners towards the respect for Human Rights and our principles of sustainability.

When dealing with suppliers and subcontractors, we expect that you will prove your integrity in doing business by ensuring that any decision connected to business activities is made in the Company's interest. Actions we all take on behalf of Techbau must not be influenced by the possibility of gain for ourselves or for anyone personally associated with us – that would be a conflict of interest. We adopt accurate qualification, selection and monitoring processes of our suppliers and partners, based on the principles of transparency and integrity. We do not tolerate collusive practices, in full respect of legality.

Other sections of the Code set out some of the more common conflicts, but they are not exhaustive. If you have questions regarding conflicts of interest, speak to your Leader or compliance officer

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# IMPROVING OUR REPUTATION



Our work is closely related to the exchange of a large amount of Company information and the success of our business is strongly affected by how we are perceived by our stakeholders. We are committed to protecting our history, preserving our image, and gaining and maintaining the trust of our stakeholders every day and in every context where we operate.

Our reputation represents the perception and the historical memory that stakeholders have of Techbau and its activities. It is a determining factor of our history, behaviours, and results.

**We are committed to protecting our reputation, complying with the principles of this Code of Ethics, and safeguarding our relational capital, taking into consideration the expectations of our stakeholders.**

You must be aware that your behaviour represents Techbau, even outside of work hours if your activity involves representing or appearing to represent Techbau, to the extent permitted by local law. Your conduct affects both the external reputation of the Company and its internal culture. We expect you to adopt excellent behaviors by feeding our relational capital: when interacting with both internal and external stakeholders, you should provide accurate and information and not mislead or attempt to improperly influence their actions. You should not tamper with any document to obscure the true nature of a transaction in Techbau's records or to impede or influence an audit, regulatory review or investigation.

Social Media communication has gained a central role in marketing communication and is crucial to the Corporate reputation. Techbau supports the use of social media and believes it is an integral part of the way stakeholder and clients interact with us and how we do business. Posting our ideas and opinions – whether they are internal or external – is a great way to express ourselves, learn and build relationships.

As Techbau Employee, it is important that you are familiar with the guidelines for participating in social media, the guiding principles for speaking about Techbau and our commitment to maintaining strong governance and risk management practices.

When using social media, remember to think before posting, be civil to others and respect their opinions, and obtain any necessary permissions.

# PREVENTING BRIBERY AND CORRUPTION



We strongly believe that corruption, in addition to being illegal, can curb economic development, undermine legitimate business activities, distort fair competition, destroy the Company's reputation, and expose companies and individuals to high risk. We fight corruption and operate without ever compromising our honesty. We think and act in compliance with legality and in Techbau's best interest, we repudiate any corruptive or collusive practice, or any others that conflict with our integrity and transparency standards.

**We are committed to complying with all relevant national and international anti-corruption and anti-bribery laws and regulations.**

There are many legitimate reasons that can make a gift, donation, or sponsorship appropriate in a given situation. Exchanging gifts of a modest amount around Christmas period is a common courtesy that can build goodwill; donating to charitable causes is a way we can give back to communities in which we work; sponsoring an event cultivate a positive reputation for Techbau. Unfortunately, all of these can also be interpreted as events aimed at providing an improper benefit or create implied obligations.

To ensure that we only engage in these activities in ethical circumstances, gifts, donations, and sponsorships must be in line with Techbau's Anti-Corruption Model. Ordinary and reasonable entertainment expenses, gifts of a low value and hospitality within the limits set by normal courtesy and in compliance with the relevant Company procedures are allowed, as well as sponsorships carried out to promote the image of the Company and its activities

As Techbau Employee, you cannot ask, promise, offer or receive, either directly or indirectly, gifts or benefits to/from employees of clients, suppliers, representatives of the Public Administration or other organization, and their relatives or people close to them, aimed at obtaining an improper benefit of any kind, not only as an advantage and/or for personal interest, even if only potential, for Techbau, but also to benefit oneself, relatives or acquaintances.

Techbau business partners are also expected to conduct themselves lawfully and ethically, and to comply with applicable anti-bribery and anti-corruption.



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# PROTECTING OUR STAKEHOLDERS' PRIVACY RIGHTS



We are committed to protecting the privacy and confidentiality of all personal information about our people, clients, suppliers, partners or other individuals against theft, loss, unauthorized access, disclosure, destruction, or misuse. We accumulate a great volume of information about our clients, subcontractors, suppliers, employees, and others who develop relationships with us.

**We have an obligation to limit the access, use and disclosure of this information for legitimate business purposes, as outlined in the Techbau Privacy policies and in accordance with laws.**

As Techbau Employee, you are required to manage and protect the information and intellectual property under your control. You are expected to keep confidential any information you acquire about Techbau even after you leave the Company. Respect the principle of need-to-know: do not access or share confidential personal information unless needed to perform your job. All Company information, if not previously approved to be disclosed externally, must be considered confidential and, therefore, classified and protected. We all have a responsibility to recognize, protect and protect Techbau's intellectual property, and respect that of third parties.

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# USING OUR CORPORATE ASSETS



**Each of us is responsible for appropriate and correct use of the assets made available by the Company for the proper performance of the work.**

We are all, therefore, required to guarantee assets integrity by protecting them against theft, abuse, sabotage, loss or damage.

As personal assets provide broad access to information and key-aspects to how we conduct business, you are asked to allow a limited personal use of the assets assigned to each individual, as long as such use does not adversely affect work performance or does comply with our internal rules.

You must safeguard your technology assets and you should prevent their damage, loss, theft or misuse. You shall then monitor the asset's operating conditions and report any situation that could represent an inadequately managed danger.

Likewise, you must safeguard the credentials you use to gain access to Techbau information and technology platform.



# OUR FUTURE

**We recognize our active contribution in shaping a better future for our children and next generations. Climate Change is one of the biggest challenges of our times: we truly recognize the need to actively participate in tackling climate change. For this reason, contributing to the regeneration of dismissed areas by preventing land consumption and fostering an effective and socially fair low-carbon energy transition and are our strategic priority, as well as our ambition. Our commitment to the fight against Climate Change includes innovative solutions aimed at reducing the impact of our operations through the adoption of renewable energies, the protection of biodiversity, the reduction of water consumptions, and the support of mitigation and adaptive actions in the contexts where we operate.**



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# ROAD TO SUSTAINABILITY



**We are committed to the principle of sustainability in the conduct of our business.**

It is fundamental to our business model to ensure we meet our environmental, social and governance (ESG) commitments to our employee, clients, and any other stakeholder which we are working with.

Today, being a sustainable Company means more than taking actions to protect and preserve the environment; it means striving to actively consider environmental, social and governance impacts, risks and opportunities in the way we conduct our business to strengthen the way in which our business is impacting the context where we operate, today and tomorrow.

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# SAFEGUARDING THE ENVIRONMENT



We undertake to safeguard the environment in all our activities. We do this through processes, solutions, technologies, and materials capable of reducing energy and natural resource consumption, therefore avoiding, or limiting impacts deriving from Company activities (pollution, greenhouse gases, waste production and inconvenience for local communities).

Everywhere we operate, we are committed to acting sustainably, minimizing environmental impacts and optimizing the use of energy and natural resources. We conduct our activities through the responsible use of resources so as not to compromise the needs of future generations, but rather, to create value for our stakeholders.

We adhere to the top international environmental certification mechanisms (GBC, LEED, WELL, ITACA) so not energy saving alone but also water saving, emissions reduction and a focus on the site and its potentials and peculiarities. The broad concepts of reducing land use, increasing comfort for occupants, and raising the concepts of recycling and recyclability are embedded in our design criteria.

As Techbau Employee and Techbau Partner you are a Pioneer of environmental protection. You are actively contributing to the development of models based on regenerative principles of the circular economy that minimize the use of virgin resources and reduce waste, maximizing the recovery and valorisation of recyclable and scrap materials.

**Environment protection, reduction of natural resource consumption and greenhouse gas emission, transition to renewable energies are common driver of our everyday business.**

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# RESPONSIBLE SOURCING



We must ensure that our procurement of goods and services aligns with our business objectives and visions, including increasing shareholder value, maintaining the highest standards of quality, and taking care of our people's interests.

We are committed to sustainable practices in our procurement activity, striving to conduct our business with suppliers in a fair, objective, transparent and professional manner. Suppliers are selected according to fairness and impartiality principles. Selection is made by verifying the quality, technical-professional eligibility, respect of applicable laws regarding human rights and labour, health, safety, and environmental and economic criteria.

When purchasing goods or services, you must keep this in mind and adhere to applicable laws. You must also ensure that your purchases are in line with your spending authority, Corporate approvals, and restrictions as to permissible types of goods or services.

Equally, we strongly encourage our suppliers and subcontractors to apply the same selection criteria when dealing with their own supply-chain, aiming at promoting compliance with the principles set out within Our Code in every phase of the supplier process.

# APPLYING OUR CODE |

The Code is made available to all stakeholders and may be retrieved on Techbau website and intranet. The Code is delivered to all Techbau Employees and Techbau Partners upon hiring or engaging and will be disseminated when updates or changes occur.

All Techbau Employees and Techbau Partners, regardless of their functions and responsibilities, are bound to observe and apply our Code. We all must be watchful of our actions and those of the people around us, our teams and anyone under our responsibility.



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# HOW DO I REPORT A BREACH OF THE CODE?

If you think that someone is not applying, or is about to violate, one of the principles of the Code of Ethics, it is your duty to report it. Techbau seriously and promptly examines all reports of suspected violations of the Code or applicable laws.

We should always feel free to express fears or draw attention to actions with possible ethical implications.

**Advise your direct Leader, other Company Leaders, and/or the Compliance Body if you:**

- Believe you may have violated the Code, an internal policy, or the law.
- Know or suspect another Techbau Employee or Techbau Partners may have violated the the Code, an internal policy or procedure, or the law.
- Feel you are being pressured to violate the Code, an internal policy or procedure, or the law.
- Have any other ethical or conflict of interest questions or concerns.
- Need guidance on how to do what is right.

If you would prefer to report the situation anonymously, or if you feel that your concerns have not been responded to or addressed appropriately using other reporting methods, use the “whistleblowing procedure”, available at the website

**<https://atc.techbau.it>**

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# WHAT HAPPENS ONCE A CONCERN IS RAISED?

**Techbau is committed to leading with integrity and takes breaches of the Code seriously.**

We all play an active role in ensuring the Code is applied across Techabu and that possible misconduct is investigated and addressed appropriately. Reporting issues and concerns contributes to the ethical culture at Techabu and helps us to maintain our commitment to high standards of business ethics and integrity as a Trusted and Responsible Business.

Techbau values your help in avoiding and uncovering possible misconduct. We strictly prohibit retaliation of any kind against anyone who shares a good-faith concern or participates in an investigation involving a violation of our Code, applicable laws or Company procedures or a situation which is incompatible with ethically correct behaviour. Accordingly, Techbau prohibits any action taken against a person who has submitted a report, including demotion, termination, job reassignment, threats, and harassment.

Persons who raise concerns are also protected by law, with any detrimental measure taken against them subject to sanctions.

Any individual who attempts in any way to intimidate or retaliate against anyone who reports a possible breach of the Code will face disciplinary action, up to and including termination of employment, regardless of their position.



# DISCIPLINARY ACTIONS |

**Compliance with the Code of Ethics is an essential part of our duties: no one in the Company is exempt, regardless of seniority. Any violation of the Code amounts to a case of professional misconduct and may lead to appropriate sanctions and disciplinary and/or legal action, in compliance with applicable laws.**

**The violation will have all the legal consequences also in relation to the preservation of the employment relationship, based on the principle of gradation, and may result in suing for damages resulting from the violation itself.**





**SHAPE LIVES**