

# CODE OF CONDUCT





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# THE CODE OF CONDUCT

Techbau's Purpose is expressed through the conscious creation of valuable infrastructure capable of generating positive and lasting impacts on people's quality of life, whilst respecting the community, the environment and future generations. In line with this commitment, Techbau considers it essential to translate its values into clear and demanding requirements, expectations and standards of conduct for suppliers and business partners. Through this Code of Conduct, Techbau aims to promote a resilient, ethical, transparent and sustainability-oriented supply chain.

As a minimum requirement, Techbau demands compliance with applicable national and international laws, the adoption of proactive measures to prevent environmental and social harm, and the development of governance mechanisms to remedy such harm should it occur.

## OVERVIEW OF TECHBAU

Techbau is a General Contractor that acts as a single point of contact for the development of civil engineering and infrastructure projects, operating in the residential, commercial, industrial, logistics, data centre and renewable energy sectors, in compliance with the highest standards of quality and safety.

Founded in 2010, the company has grown by integrating multidisciplinary expertise with qualified professionals, establishing itself in the delivery of complex projects thanks to a diversified business model based on: environmental and economic sustainability, innovation in materials, digitalisation, effective standards and partnerships with collaborators possessing solid technical and operational skills.

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# WORKING WITH TECHBAU

The Code serves as a guiding framework for all those who, in various capacities, collaborate with Techbau. It defines the values, principles and behaviours that guide the company's mission towards conscious and sustainable development, without seeking to regulate every single circumstance.

Techbau is a member of the United Nations Global Compact Network and draws inspiration from the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the Forced Labour Regulations (FLR) and the OECD Guidelines for Multinational Enterprises. Suppliers and business partners — regarded as strategic players in the value chain — are required to share and apply these same principles, as detailed in the Company Policies.

## JOINING THE SUPPLIER REGISTER

Techbau welcomes anyone wishing to work with us who applies spontaneously to join our Supplier Register, presenting their company profile.

Techbau will consider new parties for inclusion in its Vendor List on a case-by-case basis, followed by a careful assessment of the capabilities, skills and risks associated with the goods and/or services offered, which takes place through the Techbau qualification process.

# CLIMATE CHANGE

Sustainability and innovation are the fundamental principles that guide every Techbau project. The company is firmly committed to energy efficiency and the reduction of carbon emissions, adhering to the main international environmental certification protocols and the principles of the Paris Agreement.

With this in mind, Techbau has developed its own Decarbonisation Plan — aimed at limiting environmental impact and optimising its carbon footprint — through research, innovative projects and the selection of partners in the value chain who are sensitive to the risks of climate change.

## GHG EMISSIONS' REDUCTION

### Techbau Suppliers and Partners must:

- **Commit** to minimising environmental impacts, optimising the use of energy resources, increasing the use of renewable sources and setting science-based GHG reduction targets a minimizzare i propri impatti ambientali e a ottimizzare l'uso delle risorse energetiche e naturali, sviluppando e implementando piani di miglioramento e specifici indicatori chiave di performance per monitorare le loro prestazioni. — SBTi Science Based Targets — while monitoring progress using specific KPIs.
- **Share** data on environmental aspects (GHG emissions, water, land and other resource use), calculated in accordance with international standards (GHG Protocol, ISO 14064, ISO 14067, etc.), ensuring transparency regarding emissions from its own operations and upstream activities.
- **Integrate** the principles of environmental sustainability into our supply chain, supporting our partners as they work towards and achieve increasingly ambitious sustainability targets.



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# ENVIRONMENTAL PROTECTION

For Techbau, environmental protection is a core requirement and a fundamental principle that underpins every decision at both the design and corporate levels.

Techbau adopts and communicates its environmental policy and expects all stakeholders to implement measures and practices designed to mitigate environmental impacts.

## PROTECTION OF NATURAL RESOURCES AND BIODIVERSITY

### Techbau suppliers and partners must:

- **Integrate** the principles of environmental sustainability into their supply chain (energy, raw materials, emissions, water resources, waste reduction/reuse/recycling), supporting the client company's carbon neutrality objectives and actively contributing to the protection of ecosystems, biodiversity and forests.
- **Mitigate** all forms of environmental pollution (air, water, soil and groundwater, etc.) and environmental incidents, ensuring that any damage is promptly remedied in the event of an incident.
- **Provide** and **share** information relating to environmental aspects and the use of natural resources (greenhouse gas emissions from products and/or services, use of water, land and other resources), calculated in accordance with globally recognised international standards.
- **Preserve** and **manage** water resources responsibly, optimise water use, set targets to reduce water consumption, and return water of a quality suitable for the ecosystem concerned, with particular attention to those located in areas subject to water stress or of high environmental and biodiversity value, where possible exceeding legal requirements.

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## CIRCULAR ECONOMY

### Techbau suppliers and partners must:

- **Adopt** a responsible management system for hazardous waste and non-hazardous , optimise the use of resources by progressively replacing non-renewable ones with renewable or recycled alternatives, and maximise the recovery and recycling of materials in line with the Circular Economy model.
- **Support** the use and development of renewable or recycled raw materials (secondary raw materials).

## RESPONSIBLE MANAGEMENT OF HAZARDOUS AND CRITICAL MATERIALS

### Techbau Suppliers and Partners must:

- **Recognise** the risk, with regard to the extraction and trade of minerals to be used as raw materials, of negative impacts arising from human rights violations, conflicts, child labour, illegal operations and poor health and safety conditions.
- **Manage** the supply chain for any potentially critical minerals responsibly, with particular attention to those from conflict-affected and high-risk areas, maintaining an active due diligence programme through the procedures and tools of the Organisation for Economic Co-operation and Development (OECD) and the Responsible Minerals Initiative (RMI).



# BUSINESS ETHICS AND LEGALITY

Techbau adopts an Organisation, Control and Management Model in accordance with Legislative Decree 231/01, through which it promotes a business ethic founded on legality.

The model addresses the main administrative, civil and criminal offences, including those arising from misconduct by employees. Techbau reinforces this with security measures, a management system compliant with ISO 37001 and periodic due diligence on internal and external controls.

Through this Code, Techbau aims to ensure compliance with the law and fairness throughout the entire value chain.

## ANTI-BRIBERY AND CORRUPTION

### Techbau Suppliers and Partners must:

- **Reject** and prevent all forms of corruption, whether active or passive, direct or indirect, in any context and jurisdiction, even if tolerated in practice.
- **Refrain** from offering, promising, authorising or paying, directly or indirectly, material, financial or other benefits to public officials or private individuals.
- **Refrain** from accepting, or authorising the acceptance of, requests or solicitations for financial or other benefits from public officials or private individuals.
- **Comply** with regulations on anti-money laundering, self-laundering and handling stolen goods.
- **Operate** in compliance with applicable regulations to safeguard free and fair competition.

## CONFLICTS OF INTEREST

### Techbau Suppliers and Partners must:

- **Avoid** improper benefits or undue influence on the decisions of the client company's employees.
- **Refrain** from undue interference in qualification processes, contract awards or the authorisation of subcontracts, including requests for confidential information or information obtained outside the designated channels.
- **Prioritise** direct relations with the client company, avoiding intermediaries and declaring any relevant situations in advance.
- **Ensure** maximum transparency in procurement processes, including regarding corporate structure, chain of command, sustainability of the bid and operational capacity, avoiding false, misleading or incomplete information.

## GOVERNANCE AND COMPLIANCE

### Techbau Suppliers and Partners must:

- **Avoid** engaging in or tolerating practices attributable to any form of fraud, embezzlement, extortion, insolvency offences, illegal payments or other unlawful acts.
- **Monitor** developments in key national and international laws and regulations concerning sanctions relating, inter alia, to export prohibitions and controls, restrictions on trade in raw materials, financial and banking restrictions, embargoes on arms, repressive equipment or dual-use equipment, and travel bans.
- **Avoid** entering into business relationships with sanctioned parties (whether natural or legal persons) and, where necessary, promptly and fully inform the client company of any issues arising from such a relationship.

## DUE DILIGENCE

### Techbau Suppliers and Partners must:

- **Carry out** appropriate internal and external checks in relation to dealings with business partners, particularly in the context of the selection and award of contracts through tendering procedures.
- **Report** any situation that is or may appear to be in conflict in any way with the interests of the client company.

# HUMAN RIGHTS

Techbau adheres to the United Nations Global Compact Network and is guided by the provisions set out at international level in the UN Universal Declaration of Human Rights, the Declaration on Fundamental Principles and Rights at Work and the Conventions issued by the International Labour Organisation (ILO) and the Forced Labour Regulations (FLR), as well as the provisions of the UN Guiding Principles for Business and the OECD Guidelines for Multinational Enterprises.

Through this Code, Techbau aims to ensure that the company's principles and values are upheld throughout its value chain.

## FORCED LABOUR, CHILD LABOUR AND MODERN SLAVERY

### Techbau Suppliers and Partners must:

- **Prohibit** and **prevent** all forms of forced labour, irregular work, compulsory labour, modern slavery, 'caporalato' and debt bondage.
- **Provide** all employees (including temporary workers, trainees and interns) with written employment contracts that clearly specify all terms and conditions of employment, including wages and benefits, and communicate these to all employees, providing an adequate payslip for each pay period in a format and language that is clearly understood by the employees.
- **Prevent** all forms of child labour and employ workers who are of the minimum age required by law, in accordance with national, international, regional and/or local laws and regulations.
- **Ensure** that the right to terminate the employment relationship with a reasonable period of notice is guaranteed.
- **Provide** wages and related benefits that meet at least the minimum standards established by national, international, regional and/or local laws and regulations.
- **Provide** for working hours and rest periods for workers in accordance with applicable regulations and relevant international standards.
- **Ensure** respect for workers' rights and trade union freedoms, such as freedom of association and the right to collective bargaining, including the right of workers to choose their own representatives and to represent workers, by providing adequate access to the workplace for the latter as well.



## HEALTH AND SAFETY OF PERSONS

### Techbau Suppliers and Partners must:

- **Ensure** the health, safety and well-being of all workers, ensuring compliance with international, regional and national standards, local regulations and commitments made to third parties on these issues.
- **Demonstrate** the active commitment of their senior management to health and safety management, as well as the training and awareness-raising of workers regarding the adoption of behaviours that respect health and safety.
- **Identify**, assess and manage health and safety risks, putting in place controls, safe working procedures and appropriate preventive measures to prevent accidents and occupational illnesses.
- **Develop**, implement and test emergency management programmes, pursuing continuous improvement in collaboration with the client company and other suppliers through the monitoring of indicators and the application of best practices.
- **Avoid** engaging in unlawful or dangerous behaviour, promptly reporting any situation that may pose a danger, even anonymously and without fear of reprisals
- **Provide** its workers (employees, temporary workers, apprentices, trainees, etc.) with a safe and healthy working environment that includes, as a minimum, drinking water, lighting, temperature, ventilation and adequate toilet facilities and, where applicable, safe and healthy company accommodation.
- **Not to expose** young employees to work that may jeopardise their physical or mental health, their safety or their morals, including overtime and night shifts.

## ZERO TOLERANCE FOR DISCRIMINATION

### Techbau Suppliers and Partners must:

- **Prevent** all forms of discrimination, guaranteeing equal opportunities for all and ensuring an inclusive and non-discriminatory working environment, with particular regard to vulnerable groups (migrant workers, people with disabilities, young people, older people, women, indigenous workers, LGBTQIA+).
- **Respect** the cultural, religious, economic and social rights of local communities, minorities, indigenous peoples and other vulnerable groups, taking into account the operational context and the activities carried out.
- **Determine** remuneration solely on the basis of individuals' skills, experience, professional potential and results achieved. Pay equity must be guaranteed on the basis of equal merit.
- **Promote** a working environment that values diversity, talent and the contribution of every individual to the organisation.

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# CONFIDENTIALITY AND CYBERSECURITY

Data confidentiality is the responsibility of all employees. All personal data collected or processed must be protected in accordance with existing regulations, such as the EU General Data Protection Regulation (EU) 2016/679, hereinafter referred to as the GDPR.

Techbau guarantees the implementation of rigorous IT and information security measures, adhering at every level to GDPR compliance checks and through the adoption of an operational model and management system in accordance with ISO 27001.

Techbau therefore aims to provide clear guidance so that employees are aware of the opportunities, limitations and risks associated with the use of certain applications and AI, as well as how to interpret the outputs generated.

## PROTECTION OF PERSONAL DATA

### Techbau Suppliers and Partners must:

- **Ensure** the right to the protection of personal data processed, whether their own or that of third parties, by guaranteeing the adoption of appropriate procedures, such as adequate security measures, training of persons authorised to process data, and the identification of privacy roles within the scope of their activities and services.
- **Protect** the personal data of representatives, employees, collaborators, contacts and any other individuals whose personal data must be shared for any purpose, in accordance with all national, international, regional and/or local laws and regulations.
- **Disclose** any breach of information security involving the accidental or unlawful loss, unauthorised disclosure, alteration, destruction or access to personal information transmitted, stored or otherwise processed by the Supplier.
- **Respect** intellectual property rights, including those of third parties, and not to tolerate the use of counterfeit parts at any stage of the production chain.

## CYBERSECURITY

### Techbau Suppliers and Partners must:

- **Treat** confidential information in accordance with data protection laws, as well as best practices applicable in the jurisdictions in which they operate.
- **Implement** appropriate security measures to protect personal data and confidential information, adopting network systems and infrastructure compliant with current regulations (NIS2, NIST, GDPR, Workers' Statute).

## USE OF ARTIFICIAL INTELLIGENCE

In accordance with Article 4 of Regulation (EU) 2024/1689 on Artificial Intelligence, Techbau is committed to promoting and ensuring a sufficient level of AI literacy for all staff and expects external collaborators to adhere to these principles as well.

### Techbau Suppliers and Partners must:

- **Ensure** the exclusive use of secure generative AI systems and applications that comply with national regulations and laws.
- **Prohibit** the use of applications banned by the Italian Data Protection Authority.
- **Ensure** that company information and general data, or data relating to client files, and confidential and sensitive information regarding employees and/or collaborators are not entered into AI applications for the generation of prompts and the request of output from the system.
- **Ensure** that the use of generative AI does not infringe the intellectual property rights or copyright of third parties.
- **Use** generative AI as a support tool, not as an absolute truth. If the response is unsatisfactory, rephrase the question or ask for further details.
- **Inform** and **train** your staff and collaborators, and raise awareness of the risks associated with the use of Artificial Intelligence for work-related purposes. Should simulation be necessary, use information invented for that purpose, with no connection to real-life situations.
- **Check** AI responses, as the validity of the information obtained remains uncertain. Double-check the information provided by cross-referencing sources and conducting further research on a secure search engine. Collaborators are required to verify that the generated output does not constitute plagiarism of protected works.
- **Adjust** your privacy settings, check your account settings and enable any features that may reduce data sharing or limit activity tracking.
- **Ensure** trust by communicating clearly, simply and comprehensively, both internally and to clients, regarding any use of artificial intelligence systems for document processing.



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# REPORTING BREACHES OF THE CODE OF CONDUCT

Techbau promotes open dialogue with suppliers and employees, ensuring the possibility to report abuses anonymously or confidentially via the Whistleblowing Channel, in accordance with Legislative Decree No. 24/2023. Every report is handled by a designated Whistleblowing Officer, with due regard for confidentiality and without any retaliation against the whistleblower.

Techbau has adopted an Organisation, Management and Control Model pursuant to Legislative Decree No. 231/2001 and has established a Supervisory Body. Every report is followed by a thorough investigation and, where necessary, remedial procedures which may include the termination of the commercial relationship in the event of serious breaches.

The preferred approach, however, remains constructive dialogue, supporting the supplier through a corrective process to ensure their continued participation in the supply chain. For this reason, Techbau recommends and encourages suppliers to establish their own accessible and secure reporting mechanisms for their workers and the communities in which they operate.



**SHAPE LIVES**