



## CODE OF ETHICS

**CE2K S.r.l.** is a company dealing with:

- Design and production of high energy and high voltage ignition systems, flame detection systems, flame ionization (both ultraviolet to infrared) and – under the registered trademark **LXS LUXSOLAR** - Aircraft Warning Lights for elevated structures.

The entire product range is both in waterproof and explosion-proof execution.

**CE2K S.r.l.** is active all over the world in a wide range of sectors, including: automation, obstacles warning, data transmittal data transmission, environmental review, and all the petrochemical sector in general.

The Code of Ethics of **CE2K S.r.l.** identifies corporate values, highlighting the rights, duties and responsibilities of all those who - for whatever purpose - operate within COMBUSTION AND ENERGY S.R.L. towards all external stakeholders: employees, consultants, agents, business partners, public administration, public employees, and, more generally, all those who work within and /or outside the Company (from now on, "third party")

The adoption of this Code is the expression of a corporate environment whose primary goal is to satisfy as best it can the needs and expectations of **CE2K S.r.l.** counterparties, recommending and promoting high standards of professionalism and banning behaviour that is contrary not only to the law but also to the values that **CE2K S.r.l.** seeks to promote.

This Code is an integral part of the "Model of organisation, management and control" adopted by **CE2K S.r.l.** under Article 30 of Legislative Decree 81/2008 regarding Health and Safety requirements at the workplace.

**CE2K S.r.l.** is committed to disseminating the contents of the Code among those who work within the Company, as well as among all those who come into contact with the Company, taking into account any contributions and suggestions from those concerned for amendments or integrations to the Code.

Compliance with the Code of Ethics is required and applies equally to all company managers and employees, and to all those who - directly or indirectly, permanently or temporarily - establish relations with the Company, taking all necessary internal and, if within the competence of the Company, external initiatives in the event of noncompliance by third parties.

**CE2K S.r.l.** also undertakes to establish and maintain appropriate internal control procedures vis-à-vis the application of and compliance with the provisions in the Code.

The ethical principles of **CE2K S.r.l.** are:

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### A – Code of Conduct in the performance of business activities

**Legality** - All shareholders are required to comply with applicable laws and regulations, the Code of Ethics and internal company regulations applying them honestly and fairly.

**Integrity** - In its dealings with third parties, **CE2K S.r.l.** commits itself to act in a fair and transparent manner to avoid any misleading information and behaviours such as to obtain an undue advantage of or from other people's positions of weakness and lack of knowledge. To maximize the economic and financial results, **CE2K S.r.l.** is committed to dealing fairly with business counterparts, establishing lasting relationships with customers and suppliers.

**Loyalty** – Relationship with the outside world and co-workers, and among co-workers themselves, must be characterized by the utmost loyalty, which means keeping one's word, to act with a sense of responsibility in the promotion and protection of company resources. and acting in good faith in all activities and decision.

**Transparency** - All actions of **CE2K S.r.l.** must be guided by the commitment to act fairly and to provide complete, consistent and timely information, as required by law and best market practices, subject to the obligation of protecting the Group's knowhow and other assets.

**Respect for human dignity** – **CE2K S.r.l.** respects the fundamental human rights, protecting the moral integrity and ensuring equal opportunities.

Both in internal and external relationships, behaviour which involves discrimination on the basis of political opinions, trade union adherence, religion, race, nationality, age, gender and sexual orientation, health and, in general, any private personal characteristic is not tolerated.

Respect must be interpreted as Transparency. Transparency, understanding and sincerity towards our employees. Criticism must always be constructive and lead to an improvement.

Actions or behaviors are scolded, not people. Appreciation must always be public; the warning always private. Respect towards must be kept also towards the workplace and company's assets, because they are the instruments of our success. They must be always kept in good order, clean and efficient.

**CE2K S.r.l.** will work to ensure that the rights set forth in the Universal Declaration of Human Rights be guaranteed in carrying out its business duties.

### B - Ethics in Employment and Protection and Empowerment of Employees

**Commitment to improvement** -The employees commit themselves to work to the best of their professional ability and to improve them continuously through the resources offered by the Company.

**Confidentiality** – the employees commit themselves to treat every information concerning the carrying out of work as confidential , therefore they commit to not divulge it except to the extent that it may be necessary for the purpose of performing their job, in line with the principles of transparency. The





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communication to outsiders of confidential information must be carried out under the supervision of the relevant Departments.

All company data and IT tools used by the worker are made available by the Entity solely to carry out their work.

In using the datas and tools made available by the company, it is necessary to use the utmost diligence, in compliance with articles 2104 \* and 2105 \*\* of the Italian Civil Code, using them exclusively for service reasons.

*\* The employee must use the diligence required by the nature of the service due, by the interest of the company and by the higher interest of national production. It must also observe the provisions for the execution for the discipline of the work given by the entrepreneur and his collaborators on which he hierarchically depends.*

*\*\* The employee must not conduct business, on his own or on behalf of third parties, in competition with the entrepreneur, nor disclose information relating to the organization and production methods of the company, or make use of it in such a way as to be able to bring prejudice to it.*

Deformed behaviors can cause serious risks to the security and integrity of company systems and may be subject to evaluation from a disciplinary point of view as well as from a criminal point of view.

**Absence of conflict of interest** - Employees and Collaborators must ensure that all business decisions are taken in the interests of the company, consequently, they will avoid any situation - creating a conflict of interest between personal or family economic activities and the position held in **CE2K S.r.l.** - that could impair their ability to make independent judgments or choices.

**Safety, Occupational Health and Work Conditions** – **CE2K S.r.l.** believes that motivated individuals with outstanding professional skills are the most important strategic assets in its bid to compete successfully and grow its business. To this end, **CE2K S.r.l.** promotes a working environment that protects the mental and physical integrity of individuals; encourages them to be proactive, creative and actively involved; and is conducive to teamwork and assuming responsibility.

**Involvement and Equal Opportunities** - Professional development and the management of Employees are based on the principle of equal opportunities;

Involving and being involved means listen to people without prejudices, understand their expectations and needs. We do not consider ever a person only for what he/she is, but especially for what he/she might become. We Inform all of our goals and achievements and communicate even the simplest ideas: they could change into a unique opportunity and a great success. It is important to convey a strong message to people working with us: the company. The company is everyone's business: we always use the word "Us" instead of "I. We must be proud to belong to a great organisation.

The recognition of the results achieved, the professional potential and personal skills are essential criteria for career advancement and salary increase, in the continuous and systematic comparison with the market. **CE2K S.r.l.** commits to preserve a non-discriminatory working environment. Teasing based upon sex, sexual orientation, religious beliefs, race, age, disability status, trade union association or political affiliation will not be tolerated. The criteria used in the recruitment, promotion, access to training, career



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progression, are exclusively related to work performance and merit. **CE2K S.r.l.** is committed to ensuring a safe and healthy workplace, to be solidarity-inspired and responsible towards the environment, comply with all laws and regulations concerning the environment, safety and health. We must strive to continuously reduce the consumption of energy and water, to use less paper and less fuel, to reduce noise in all its forms, to keep down the production of waste and to manage the contaminated products in the most appropriate manner.

**Professional development and protection of labour** - **CE2K S.r.l.** agrees to make available to its employees adequate tools and opportunities for professional growth. **CE2K S.r.l.** agrees not to engage staff who work against their will, or that it is not free to terminate the employment relationship, not to engage child labour (children under 16 years), not to employ young workers (boys under the age of 18 years) in ) in unhealthy or dangerous situations , nor during school time. **CE2K S.r.l.** banishes any verbal, physical or psychological violence toward any individual inside or outside the company. On this basis, we choose to work only with company providing services and material that do not go against these principles.

**Concreteness and initiative** – we take care of the practical aspects, we are determined, we pursue an evidence-based policy, we try to plan whatever is possible to avoid problems and time loss. We always check the cost-benefit ratio of the ideas web ring and the project we develop. We give order and continuity to our work. In **CE2K S.r.l.** there is only room for dynamic and self-starter people. Vitality and energy are at the basis of **CE2K S.r.l.**'s proper functioning. No one should ever give excuses for not doing the work. Everyone should be an example for the others. Dynamism is contagious: we always have to be an example for all.

**Responsibility and Delegation** - Awareness to account for one's and other's actions, solve problems without transferring the burden to others. If responsibility is an inconvenience, this means that you don't have all the necessary knowledge to take it; you don't have to be discouraged nor refuse responsibility, but simply get up and get the necessary knowledge. With the growth of our company, it becomes increasingly necessary to delegate responsibilities and encourage people to take their own initiatives. To do this, you need a good deal of tolerance: people to whom we have delegated authority and responsibility, if good ones, will do the job in their own way. Let people make mistakes if we want them to grow. The important thing is not persisting in error.

**Humility and willingness to learn** – Take nothing for granted or already known. Never have any kind of presumption, being able to recognize our own limits. We have to make the most of every experience and always questioning ourselves. Transfer our knowledge to others helps the others and us, too. From the contact with external people, we always try to get the exterior, we always try to get the most information. We conserve and grow the curiosity. We grow people. Training is the investment we do on our major resource: ourselves.





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**Team Playing** - It is important to feel part of a team and not "single payers". The team wins, not the individual. We should never forget that our job influences our colleagues' one. The team must meet periodically to solve problems and set out objectives. The team is a group in which the roles are well defined and there is a trainer who organises. In the eye of the customer, it is always the company that works well, not the single.

**Common rules** - **CE2K S.r.l.** does not support any political party or sport club and does not tolerate any proclaim or events regarding whatever adopted position. Our company does not tolerate the display of posters/calendars with sexual background, vulgar, obscene. **CE2K S.r.l.** adheres to the requirements on protection of employees' health and safety at work. Abuse of alcohol or drugs is not tolerated.

**External Collaborators** - Sales agents, consultants, representatives, independent contractors, temporary external workers and suppliers are required to observe the same standards of conduct for the employees in our company when they conduct business with or on our behalf. No external collaborator is authorised, indirectly or through agents, to take any action that is not allowed by Company policies.

### C – External relations

**Relations with customers** - Commercial fairness is a key factor for developing and maintaining profitable and lasting relationships with customers. It is extremely important that we engage only with promises that we can keep. Customers are always our top priority, we listen to their needs. The personal relationship with customers creates more value. Frequent visits to the customers further reinforce and optimize the relationship and the confidence. We should always remember that the customer pays our salary.

**Relations with Suppliers** – It is extremely important that we are committed to conducting extensive surveys before entry before engaging suppliers, sub suppliers, subcontractors, artisans and external services' suppliers. From their quality of products and processes depends, to a great extent , our quality too. The price is not the only discriminating factor, and in many cases it is not even the most important factor.

**Information** – It is strictly forbidden to divulge any communication of confidential information regarding strategic plans, sales prices, financial information, product designs, information related to negotiations, agreements or business relationships between our company and others, financial information about the employee relating to strategic plans, sales prices, financial information about the employee, software, trade secrets, patents, trademarks and similar information from customers or suppliers, to any people or organisation, directly or indirectly. Our company believes that its own network resources are a strategic asset, our policy aims at our network resources by implementing security checks to prevent the unwanted disclosure, amendment or destruction of information not accessible to the public, the interruption in the service of process od the information provided to users and the theft of company



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resource. All the employees are requested to ensure that the use of the company's IT resources, included e-mail and other online resources, the use of hardware and software are in line with the objectives of our business activity. Our company is committed to respecting the confidentiality and privacy of customers and employees. It's each employee's responsibility to respect the privacy of customers and colleagues.

**Fraud, theft, presents, offer of money and conflict of interest** - Our work activities must reflect the values of honesty, loyalty, reliability, fairness, solidarity with others and a sense of responsibility. Any act that involves fraud, theft, misappropriation, means also take commercial decisions with honesty and integrity, on the basis of objective elements such as: costs, quality, value, service and ability to meet the on going obligations assumed. Therefore our employees cannot accept or offer gifts, money, entertainment, or other gratuities or personal favours; should any gift reach the seat of the company, it will be collected and delivered to Institutions with the aim of helping the poor and needy people. All the employees should refrain from any action or relationship that might conflict with the company's interests. Conflicts of interest arise when the employer uses its position for personal profit or when the employee's personal interest conflict with the company's ones.

### D - Commitment to Sustainable Development and Responsible Behaviour toward s the Community

**Environment and promotion of sustainable development** - For **CE2K S.r.l.** environmental protection is a community value and is compatible with business development.

**CE2K S.r.l.** is consequently committed to operate in compliance with regulations in force, applying the best technology available to promote and plan development of its business in a manner that maximizes the value of natural resources, preserve the environment for future generations promote initiatives for a broad-based protection of the environment, promote initiatives for a widespread environmental protection.

**Responsibility towards the community** – **CE2K S.r.l.** takes into account the needs of its host communities and contributes to their economic, social and civil development.

**Charity and sponsorship** - Any charitable contribution provided by **CE2K S.r.l.** will be in favour of Childhood and/or research organisation for the common good.

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