

CODE OF CONDUCT

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ICS SRL

ICS Group S.r.l.

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Summary

Code of Conduct	3
Ethical values of the company	4
Business operating principles	4
Addressees of the Code of Conduct	5
Applications and requirements of the Code of Conduct	6
Principles of Conduct with Employees and associates	8
Accuracy and transparency of accounting and internal control	10
Relations with third parties	10
Customer relations	11
Integrity of services	11
Relations with suppliers and external consultants	12
Relations with the public administration	12
Relations with judicial and other institutional authorities	13
Relations with politics and trade unions	13
Relations with other interlocutors	13
Sponsorships	14
Relations with members	14
External communications	14
Intellectual property	15

ICS Group (hereafter ICS) founded in 1979, is active in the energy, chemical and petrochemical sector, supplies primary oil companies, energy utilities, asset management companies and investment funds, government departments such as the Defense Logistic Agency Energy (DESC / USA) and the Italian Navy, insurance companies and international shipowners, inspection, verification, analysis and certification services for oil, petrochemical and bulk products.

ICS operates through a network of offices and affiliated companies present in Italy and worldwide.

With many years of experience in the energy sector, ICS has created, through a diversification strategy, a new business division dedicated to the world of Renewable Energy which, based on the specific development needs of its customers, is responsible for managing and taking care of the entire investment process offering, also through partner companies, Project Development, EPC and O&M Contractor and Investment Advisor services.

ICS always looks beyond the expectations of customers and companies to offer market-leading services wherever it is needed.

Our skills are constantly perfected to guarantee excellence, they are the heart of who we are.

ICS has always inspired its business to principles of ethical integrity and, consistently, has deemed it appropriate to equip the Company itself with a Code of Conduct that collects these values and establishes the principles and rules of conduct that follow from them and which compliance with the corporate bodies, management, service providers, external collaborators and any person who cooperates in any capacity with the ICS Group (hereinafter the Recipients).

We try to be the emblem of our passion, integrity, entrepreneurship and our spirit of innovation, always striving to keep faith with our vision.

These values guide us in everything we do and are considered the fundamental basis of ICS strategic planning, objectives and operational management.

Code of Conduct

The Code of Conduct (hereafter Code) of ICS and the Group companies therefore collects the principles and general rules of conduct that must be observed in order to ensure the proper functioning, reliability and reputation of ICS and the companies from the itself controlled, directly or indirectly.

ICS, like all Group companies, is particularly careful in promoting the application of the principles contained in the Code to its business in the belief that ethics in conducting business is the basis of the success of the company and represents the best expression of the its own image, element, the latter, which constitutes a primary and essential value for the ICS Group.

The ICS Group considers compliance with the laws and regulations applicable in all the countries in which it operates, fairness and transparency in the conduct of business essential.

In particular, the directors of the ICS Group companies are required to be inspired by the principles of the Code in setting corporate objectives, in carrying out projects, and in any management decision or action.

Similarly, executives and managers of corporate functions, in concretely implementing the management activity of the Group companies, must be inspired by the same principles, both internally, thus strengthening cohesion and the spirit of mutual collaboration, and in vis-à-vis third parties, with an explicit prohibition on resorting to illegitimate favoritism, collusive practices, corruption and / or solicitation of personal advantages for oneself or for others.

ICS and the Group companies undertake to ensure the maximum dissemination of this Code by arranging every useful knowledge tool and carrying out a process of raising awareness of its contents, as well as constantly checking the degree of compliance within the Group itself and, finally , to update it in line with the Group's organizational, commercial and financial developments.

The Recipients must therefore actively contribute to the implementation of the Code of Ethics and report any problems or deficiencies to the competent control body (chief compliance officer).

Ethical values of the company

In order to achieve its objectives, ICS and the Group companies assume as their ethical values:

- **TRUST:** this is our most precious resource, the foundation of our brand and our reputation. Customers rely on our integrity and trust must always be nurtured and protected. ICS 'success is based on the trust it gains day after day from its customers, collaborators, partners and communities in which it does business.
- **HONESTY AND TRANSPARENCY:** the legality, correctness, honesty, fairness and impartiality of behavior inside and outside the company constitute a common way of feeling and acting, in everything we do, we must be honest with ourselves, with our customers and colleagues. Under no circumstances are lies, deception or dishonesty justified.

ICS undertakes to provide all its interlocutors, in a clear, complete and timely manner, with information relating to actions carried out at all levels of the company

- **RESPONSIBILITY:** it is considered essential to engage loyally and effectively to achieve corporate objectives with the awareness of one's duties and responsibilities, every action or omission of ours has consequences. We recognize the consequences of our choices and do not blame others for our actions.

Business operating principles

Our decisions will be guided by respect for the principles and standards of impartial behavior, and not by arbitrary choices or personal preferences.

Due to its Code of Conduct, ICS assumes as its operating principles:

- **Sustainability, value creation and social and environmental responsibility:** ICS is committed to combining economic and social value with the aim of satisfying the legitimate expectations of all those who enter into relations with it over time: customers, workers, partners, suppliers, institutions and local communities. ICS pursues responsible management and the use of solutions, for the exercise of its activities, aimed at respecting and protecting the environment, using the most suitable technologies to prevent environmental risks and reduce direct and indirect environmental impacts.
- **Competence, quality, excellence of services in terms of efficiency:** ICS pursues a policy of continuous improvement, aimed at achieving maximum satisfaction from its customers,

guaranteeing a high level of service through the professionalism and preparation of the staff ; through the assurance of constant quality standards, the prevention of errors, the management of unexpected events, the systematic listening of customers; The continuous improvement of business processes through personalization, clarity of language, continuity; ICS undertakes to quickly pursue the objectives set by introducing the principle of optimization, in the management of human resources, time, financial and technological resources, in addition to innovation and continuous improvement, in each activity;

- **Reliability and confidentiality:** in ICS, daily action aims to provide a unique and reliable response to customer expectations, the actions, operations and, more generally, the behaviors of ICS are inspired by compliance with the laws and regulations in force in all the countries in which the ICS Group operates, with maximum transparency, fairness and reliability. In the management of the activities, the Recipients are required to make information transparent, truthful, complete and accurate and to safeguard the information assets of each Customer and guarantee the confidentiality, in every phase of the communication development process, of the personal data in their possession. Administrators, employees and collaborators are required to use the data exclusively for purposes related to the exercise of their respective duties, observing the security measures adopted. ICS guarantees respect for people's privacy.
- **Equity, involvement and enhancement:** ICS is committed to enhancing the experience and developing the skills of all workers, to promoting cooperation and the exchange of knowledge, so that work is a source of satisfaction, pride for people as well as a relevant factor for the success of the business. We want to reward behaviors consistent with the mission and values. ICS intends to promote, through the culture of dialogue, the dissemination of information and the spirit of belonging to a single and integrated group.

Addressees of the Code of Conduct

This Code is addressed to the corporate bodies and their members, to the management, to the workers, to the external collaborators, to the consultants, freelancers, to the agents, and to any other person who can act in the name and on behalf of ICS and who in various capacities and with different responsibilities they achieve, directly and indirectly, the purposes of ICS, in general, to all those with whom ICS and the other Group companies and / or divisions come into contact during their business.

Applications and obligations of the Code of Conduct

The directors, managers, managers of ICS and Group companies and departments, build relationships based on trust, to this end they inspire daily behavior to comply with the rules contained in this Code and to standardize their activities with values of loyalty, honesty and good faith, fairness, integrity.

All powers regarding the dissemination and implementation of this Code are reserved to the Board of Directors, which appoints a chief compliance officer and a chief operating officer for each affiliated company.

It is the responsibility of each Recipient to read and understand the Code and undertake to respect its principles. Recipients are required to participate in integrity training courses periodically organized by ICS. Managers in turn must ensure that all employees subordinate to them have been properly trained, have fully understood the Code and are able to comply with it.

ICS is committed to ensuring a culture in which integrity and professional ethics issues can be raised and discussed openly.

Assistance and support are available to Recipients in order to understand the Code and help make the right choice when ethical dilemmas are to be addressed.

If Managers are directly or indirectly aware of violations of the Code or indications of violations of the Code, they are obliged to notify the chief operating officer who, in turn, has the obligation to submit the matter to chief compliance officer. The chief compliance officer will be able to resolve the opening of a proceeding or the filing of the complaint.

Employees and / or collaborators are encouraged to openly report and report in the event of any doubt or suspicion of violation of the Code. ICS ensures that no one will suffer retaliation or unpleasant consequences for requesting assistance or reporting a violation of the Code. Disciplinary measures will be imposed against retaliation against employees who have reported a violation in good faith.

Any breach of the Code, however slight, can damage the reputation and the ICS brand.

Any violation of the provisions of the Code constitutes non-fulfillment of the obligations of the employment relationship and / or disciplinary offense, likewise compliance with the principles of this Code constitutes part of the contractual obligations assumed by collaborators, consultants and other subjects in business relationships with the Group companies, any violation of the provisions contained therein could constitute a breach of the contractual obligations assumed, with any legal consequence with regard to the termination of the contract or the assignment conferred, and the compensation for the consequential damages.

Violations of the Code will result in disciplinary action, including dismissal, and prosecutions in the event of serious violations.

In case of doubt about the meaning of the Code or its application in specific circumstances, employees and / or collaborators should discuss it with their supervisor or manager.

If it is not possible or appropriate for an employee to raise the matter with their manager of reference, they can still contact the ICS chief compliance operating or chief compliance officer.

Employees who notice a violation or a suspected violation of the Code are urged to report to the ICS chief compliance operating or chief compliance officer.

Chief Compliance Operating and Chief Compliance Officer may be contacted by current or former ICS employees and / or collaborators, by customers or suppliers, and by third parties involved in matters relating to the Code of Conduct, by email at: [chiefcomplianceofficer @ icsgroups .biz](mailto:chiefcomplianceofficer@icsgroups.biz).

Communications made to managers are treated confidentially and are reported to the chief compliance operating, which respects, when requested, the anonymity of the informant.

When the chief compliance operating or the chief compliance officer is contacted in relation to the Code, the information provided is kept confidential and used exclusively in response to or in connection with the matter raised. People who report are encouraged to provide their name and personal details, but they can also choose to keep their identity confidential.

Suspected violations of the Code which are brought to the attention of the chief compliance operating or chief compliance officer are subject to impartial investigations. When deemed appropriate, the outcome of the investigation is communicated to the person who made the complaint or reported the matter.

Conflicts of interest, or the appearance of a possible conflict of interest, must be avoided. Recipients are expected to report to the Chief Compliance Operating or to the Chief Compliance Officer as soon as they realize that their personal interests or those of their close relatives or friends may conflict with the interests of ICS.

A conflict of interest arises when the opportunity of a Recipient's personal profit can interfere with his judgment, objectivity, independence and loyalty to ICS.

The same principle applies when relatives or close friends of a Recipient hold an activity or interest that conflicts with ICS.

Conflicts of interest can present themselves in many ways. In case of doubt, the Recipients should request assistance.

Recipients must immediately make a written declaration of any conflicts of interest, deliver it to the chief compliance operating or chief compliance officer and refrain from making any decision about it, for as long as they are involved in a potential conflict of interest.

By close relatives of a Recipient is meant: spouse or partner / companion; children, grandchildren; parents and grandparents; brothers Sisters; in-laws / cognate; genera and daughters-in-law; any cohabiting partner of the Recipient.

Some possible conflicts of interest in which the Recipients could be involved, can be resolved following the prior approval and adequate authorization of ICS. These include: serving on the board of directors of a company outside ICS, serving on the board of professional or industry associations, taking on a political appointment at regional or national level.

Accepting a job or job outside the ICS requires written approval from the managing director of the affiliate company. However, working for an ICS competitor is not allowed. Recipients do not use the name and reputation of the ICS Group for personal purposes.

Principles of Conduct with Employees and collaborators

Employees and collaborators operate contributing to the achievement of the corporate purpose with professional rigor, loyalty, honesty and good faith, correctness, commitment and spirit of mutual collaboration. The criteria of collaboration, loyalty and mutual respect must shape the relationships between employees of any level, and between them and third parties, with whom they come into contact due to the work carried out. Every action, operation and, more generally, any activity carried out by employees and collaborators must comply with the rules of transparency, completeness and truthfulness of the information, as well as company procedures.

ICS and Group companies promote the value of the person through respect for physical, cultural and moral integrity, protecting their employees and collaborators from discrimination for reasons of nationality, race, ethnicity, religious belief, political affiliation and union, language, age, sex and sexuality, guaranteeing working conditions respectful of the dignity of the person and in this sense they censure harmful and discriminatory behavior of the person also on beliefs and preferences and expressly condemn any form of psychological, physical harassment and sexual.

In this sense, Employees and / or collaborators must actively contribute to maintaining a climate of mutual respect for each person's dignity and skills.

The staff are asked for information exclusively useful for ascertaining professional and working requirements, in respect of their private sphere. The company, in the employment relationship, enhances the skills, potential and commitment, using clear and homogeneous evaluation criteria.

The ICS Group considers its employees and collaborators as a precious and indispensable resource for its existence and future development. It believes it essential to guarantee uniformity and consistency of management in all the companies and countries in which the Group is present, in compliance with local cultures and laws.

The ICS Group pursues excellence and enhancement of the spirit of innovation, while respecting the limits of everyone's responsibilities and, at the same time, promotes the participation of people in their growth project.

Management and employees are encouraged to take responsibility and work to overcome challenges and achieve corporate goals. The Group's entrepreneurial culture recognizes, promotes and rewards individual proactivity and teamwork.

In order to enhance the skills and competences of its employees, the ICS Group adopts merit criteria and guarantees equal opportunities for all, without any discrimination.

ICS and the Group companies strive to root a culture of worker safety and health within the workplace, promoting awareness of the risks and empowerment of individual behavior. The ICS Group acts towards its employees and collaborators in full compliance with the provisions of the Italian legislation on health and safety at work pursuant to Legislative Decree April 9, 2008 n. 81, and its subsequent amendments and additions, or the local regulations in force in the various countries.

The ICS Group, in compliance with Legislative Decree 196/2003 "Code regarding the protection of personal data" and of individual local laws for foreign companies, protects personal data processed in the context of its business in order to avoid its improper or even illegal use and consequently adopts specific procedures aimed at adequate information to interested parties; to acquire the consent of the interested parties where necessary.

ICS and the Group companies apply and constantly update policies and specific procedures for the protection of information.

Furthermore, each Employee and / or collaborator must conform his behavior to the utmost confidentiality even outside of working hours in order to safeguard the technical, financial, legal, administrative, personnel and commercial know-how of the company.

In addition, all those who, as a result of carrying out their duties, have the material availability of confidential and relevant information, are required to avoid any improper use or undue disclosure of the information. In particular, each Recipient is required to process only the data and information necessary for the purposes of the area in which he carries out his business; to communicate data and information in accordance with current company procedures; to keep the data and information in such a way as to make them inaccessible to unauthorized persons.

Employees must not report on behalf of ICS, discuss or disclose any information regarding ICS to the media, financial analysts, current or potential investors, must not make any public statements on behalf of ICS unless expressly authorized to do so.

Personal opinions on religion and politics, and other sensitive issues cannot be communicated on ICS letterhead, by email or in any other context in which such opinions or materials can be attributed to ICS.

Employees must keep ICS confidential information as well as colleagues' personal data confidential; they must not disclose or discuss any sensitive information relating to ICS financial

performance, investment, strategies, projects or customers. This obligation also applies after the termination of the employment relationship with ICS.

Employees must not pursue any personal investment or commercial opportunity based on non-public information relating to ICS, its customers or suppliers.

Generally, inside information includes non-public financial results, strategic plans currently being defined by the ICS Group, proposals for acquisitions and mergers, potential changes at senior management levels. Assistance must be sought from the ICS Legal Department prior to any transaction that may fall into the above categories.

In the course of its activities, ICS sometimes obtains important non-public information relating to customers or third parties. Employees are prohibited from trading the shares of customers or third parties for as long as they are in possession of such confidential information.

It is forbidden to pass any information of this kind, or to give investment advice to third parties or close relatives on the basis of privileged knowledge obtained during the period of employment at ICS.

The company also protects employees and collaborators from sexual harassment, acts of psychological violence and from any discriminatory or harmful attitude to the person. Any form of abuse, sexual harassment or mistreatment is prohibited. Unwanted sexual advances, requests for sexual favors or inappropriate physical contacts are not tolerated. It is expected that all employees treat their colleagues with respect. Employees must always be honest and respectful in managing relationships with staff members, colleagues and managers.

The hierarchical superior will not ask his collaborators for personal favors or any other behavior not foreseen by the employment contracts and by the rules of this Code.

Each ICS employee is required to operate with the diligence and efficiency necessary to protect and enhance corporate resources, ensuring their use consistent with the company's interest.

Likewise, it is the responsibility of employees and collaborators not only to protect these assets, but also to prevent their fraudulent or improper use, for their benefit, of third parties or even of the Group companies themselves.

All employees and collaborators must avoid situations in which conflicts of interest may arise.

Likewise, they must refrain from personally taking advantage of the position, information and discretion related to their function. All employees and collaborators are required to report potential conflict of interest situations in which they may be involved to their direct superiors.

ICS's image and reputation represent a heritage that employees and collaborators must protect with their behavior in every situation, taking into account the changing social context, technology and new tools available.

Given the freedom of opinion of each employee or collaborator and the choices made by the company, everyone's behavior must conform to the safeguarding of ICS's reputation.

Correctness and transparency of accounting and internal control

The ICS Group, in keeping the accounts, acts in the most rigorous compliance with the applicable legislation, including regulations, relating to the preparation of the financial statements and more generally to the mandatory administrative and accounting documentation.

Accounting records of management events, company information and data provided to third parties are carried out according to criteria of transparency, correctness, accuracy and completeness.

All records are kept in accordance with applicable laws and ICS Group policies.

The Recipients are required, as far as they are competent, to actively collaborate in the correct and effective functioning of the internal control system.

The company functions in charge are guaranteed free access to data, documentation and any useful information for carrying out the control activity.

Relations with third parties

The ICS Group is particularly careful to develop a relationship of trust with all its possible interlocutors.

In carrying out its activities, ICS and the Group companies comply with the principles of loyalty and fairness, requesting all those who work on their behalf honest, transparent and compliant behaviors, not tolerating corrupt and / or collusive conduct, nor favoritism not due.

Employees, collaborators, or anyone acting on behalf of ICS, in carrying out any activity connected to ICS or other companies belonging to the Group, are prohibited from giving / offering and / or accepting / receiving gifts, benefits and / or any other utility, personal and otherwise, except for gifts of moderate value attributable to normal courtesy relations or commercial practices.

Relations with customers

The relationship with the customer must encourage, as far as possible and in compliance with company procedures, maximum customer satisfaction.

ICS works to achieve the highest possible level of service in all its areas of competence, compatibly with the different territorial characteristics and with the rules issued by regulatory bodies.

ICS bases its relationship with customers on availability, respect, courtesy, participation and is committed to their satisfaction. Recognizing the value of listening and dialogue, it establishes tools and channels aimed at ensuring customers the timeliness and quality of information and communication

Customers must be given complete and accurate information on the services provided to them so as to allow them to make informed choices, so as not to overlook any element relevant to the decision for the current or potential customer;

ICS and the Group companies guarantee adequate quality standards for the services offered and are committed to periodically monitoring the quality of the services produced.

ICS is committed to being respectful of the privacy provisions.

ICS, aware of the differences between the markets in which it operates, guarantees correctness in contracts and commercial relations.

ICS promotes dialogue and collaboration with customers and favors the non-judicial resolution of possible disputes, promoting conciliatory procedures to prevent judicial disputes between the company and the customer.

Integrity of services

All ICS services must be undertaken professionally and honestly in accordance with agreed standards, methods and regulations. ICS maintains its independence of judgment and does not yield in the face of pressure or incentives to distort any decisions or to alter the results of its investigations, certifications, verifications or tests. All decisions must be properly documented and no false reports or certificates must be issued.

All decisions and results must be carefully documented and must not be modified improperly. Decisions and opinions issued by ICS are based on true and accurate job files and on reports of the activities maintained in accordance with the policies of the ICS group.

Relations with suppliers and external consultants

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The conduct of ICS in the procurement phases of goods, services and works is based on the search for quality of services, competence / professionalism, respect for the environment and social responsibility, according to the rules dictated by specific regulations, procedures and certifications; the selection and qualification criteria of suppliers are based on fairness and fairness.

In the choice of suppliers and external consultants, as well as in the determination of the conditions of purchase of goods and services, or in the assignment of professional assignments, the Recipients must try to obtain the maximum competitive advantage for the Group, selecting the supplier or consultant who is able to provide goods and services of the required quality on the most convenient terms and conditions.

ICS is committed to developing cooperation relationships with suppliers based on communication aimed at the mutual exchange of skills and information and which favors the creation of common value.

The stipulation of a contract with a supplier must always be based on extremely clear relationships, avoiding, where possible, the assumption of contractual obligations that involve forms of dependence for the contracting supplier or for the company of the ICS Group involved.

Compensation and any amount paid to suppliers and consultants for supplies and professional assignments must be in line with market conditions and adequately documented.

The management of contracts with suppliers is based on fairness, avoiding any possible form of abuse.

ICS undertakes to supervise, in the forms and ways provided for in the contracts, to preserve the health and safety of the workers of the companies involved in their supplies. ICS ascertains that the requirements of these companies correspond over time to those required by the company qualification procedures and systems.

ICS avoids any gift and receipt of gifts that can even be interpreted as exceeding normal commercial courtesy practices or in any case aimed at acquiring preferential treatments for themselves or for the Group companies.

Those who receive gifts or other utilities other than those of modest value and in the context of an ordinary commercial courtesy practice, must inform the reference Director who will return them or donate them to charity in accordance with the specific company provisions on the matter.

Relations with the public administration

Relations with the public administration are exclusively those instrumental to obtaining authorizations that may be necessary for the performance of the company activity, aimed at assessing the implications of laws and regulations with respect to company activities, those

necessary in response to requests made to ICS and / o to Group companies from the public administration, in carrying out its institutional activity.

Relations with the public administration must always be clear, transparent and correct and such as not to be susceptible to ambiguous or misleading interpretations.

In particular, the Recipients must not try to improperly influence the decisions of the public administration by offering money or other utilities, such as job or commercial opportunities that could benefit public officials or persons in charge of a public service, as well as their family members.

ICS and Group companies cannot make direct or indirect contributions of any kind or allocate funds to support public entities belonging to the public administration, except as permitted and provided for by the laws and regulations in force and on condition that they are regularly

approved by the competent corporate functions, which are regularly documented from an accounting and management point of view, which do not place any of the Recipients in a position of conflict of interest.

Relations with the judicial authority and other institutional authorities

The management of relations with the judicial authority and the other institutional authorities is reserved for the corporate functions proposed for this.

The Recipients are required to ensure maximum availability and collaboration towards the judicial authority and / or the other institutional authorities during any checks or inspections they organize.

The Recipients who, for facts related to the employment relationship, will be subject, also in a personal capacity, to investigations and inspections or will receive comparative mandates, and / or those who have been notified of other registered judicial checks inform the Supervisory Body of ICS o the competent control body of the other Group companies.

Relations with political and trade union organizations

The ICS Group contributes to the economic well-being and growth of the community in which it operates.

To this end, the ICS Group conforms, in carrying out its activities, to respect local and national realities, promoting dialogue with trade unions or other associations.

ICS and the Group companies base their relations with political parties or their representatives or candidates on the most rigorous compliance with current legislation.

Recipients are prohibited from promising or disbursing payments or benefits of any kind, in the name and / or on behalf of the ICS Group, in favor of political and trade union organizations or their representatives, ICS does not make contributions of any kind to political parties and to candidates in the elections and refrains from any undue form of pressure on public representatives to obtain advantages for the company.

Relations with other interlocutors

The relations of the ICS Group with private entities, such as non-profit organizations and other non-profit entities, must be inspired by the strictest compliance with the applicable legal provisions and cannot, in any way, compromise the integrity and reputation of the ICS Group.

The taking on of commitments and the management of relationships, of any kind, with private entities, are reserved exclusively to the corporate functions assigned to it and to the personnel authorized to do so according to the system of delegations and company procedures.

Sponsorships

ICS and the Group companies can adhere to sponsorship requests for events that offer guarantees of quality and seriousness.

Sponsorships may concern social, environmental, sports, entertainment and art issues.

In support of social and cultural initiatives, ICS follows a specific procedure, taking into consideration only initiatives consistent with its strategic objectives, with the principles of environmental and social responsibility, with the guidelines adopted by the Board of Directors.

Relations with members

The ICS Group endeavors to ensure that equal treatment is recognized for all shareholders, all substantive and procedural correctness criteria are respected, according to established rules of conduct.

The advantages deriving from belonging to a group are pursued in compliance, in addition to the applicable legislation, of the interest of each company in profitability and in the creation of value for members.

ICS is committed to creating medium to long-term value for its members, with effective control of corporate risks, with socially responsible management of the business fields in which it operates and with the continuous commitment to management efficiency, for the safe and efficient use of capital and for the protection of corporate assets. ICS is aware of the importance of establishing a relationship of trust with members with behaviors inspired by transparency and continuous, timely and clear communication.

External communications

Any external communication of documents and information regarding the ICS Group or other subjects with whom ICS spa and the companies of the Group relate, must take place in compliance with the laws, regulations and professional conduct practices in force.

In any case, the disclosure of any confidential information acquired in carrying out company activities is prohibited; the disclosure of false or tendentious news concerning the ICS Group or other subjects with whom ICS and the companies of the Group interact in carrying out their activities; any form of pressure aimed at the acquisition of favorable attitudes by the communication / information bodies to the public.

To ensure completeness and consistency of the information, the relationships of ICS and the Group companies with the public information bodies are reserved for the functions in charge.

Intellectual property

ICS protects its intellectual property and respects the intellectual property of others.

Through the work and innovation skills of its employees, ICS generates high-value ideas, services, commercial procedures and strategies. This intellectual property plays a central role in creating a competitive advantage and must be protected against disclosure and misuse.

The intellectual property of ICS can be manifested in various forms, including procedures, projects, methods, operational procedures, commercial and market strategies, customer-related information, cost models and tariffs. Employees must not disclose, copy or use this intellectual property in any way except for the purposes for which it was conceived.

Employees need to take equal care when it comes to customer intellectual property.

ICS does not intentionally violate the intellectual property of a third party. The use of unlicensed software, the use and reproduction of copyrighted material without authorization, or the intentional violation of a patent is prohibited.

The Code comes into force from February 2019 and replaces the previous version.

This Code is valid for two years, after which it will be subject to verification and possible revision.

The other Group companies also receive and adopt this Code of Conduct.