



ELABORATED:	F002	5.2	SG	INT	MOD	02	rev 00	page	1	Of
Date:05/12/2024	Standard reference: ISO 9001:2015; ISO 14001:2015; ISO 45001:2023; SA 8000:2014; PAS 24000:2022									
OBJECT	Code of Ethics									

INDEX

1.	Foreword	2
2.	Purpose and scope	2
3.	Regulatory References	2
4.	General Principles	3
5.	Relations with employees and collaborators	4
6.	Work environment	5
7.	Company Management	6
8.	External relations	7
9.	Internal control system	8
10.	Guidelines of the sanctioning system	8
11.	Final provisions	9

Rev.	Date	Description	Paragraphs changed
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02			
03			
04			

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		 <p>The seal is circular with the text 'ORDINE INGEGNERI PROV. BOLOGNA' around the top edge. Inside, it reads 'INGEGNERE MARCO TORA', 'LAUREA SPECIALISTICA', 'Sezione IV', and 'N. 4735/1998'. The seal also includes the categories 'ambientale, industriale, informatica' at the bottom.</p>

ELABORATED:	F002	5.2	SG	INT	MOD	02	rev 00	page	2	Of	Highlevel  Team Engineering and Management T.H.E.M.A. ARCHITECTURE & ENGINEERING Company Viale Palmiro Togliatti, 25 - 40132 BOLOGNA - Italy www.thema96.it - phone +39(0)51 5878411
Date:05/12/2024	Standard reference: ISO 9001:2015; ISO 14001:2015; ISO 45001:2023; SA 8000:2014; PAS 24000:2022										
OBJECT	Code of Ethics										

1. Premise

THEMA . SRL complies with the highest ethical principles in carrying out its economic activity, adhering to the dictates of art. 41 of the Italian Constitution, according to which private economic initiative *"cannot be carried out in conflict with social utility or in a way that causes harm to security, freedom, human dignity"*.

This Code of Ethics is mandatory for directors, employees and all collaborators who work on behalf of the company, whether permanent or temporary. **THEMA. SRL** ensures maximum dissemination and awareness of this document, both within its own organizational structure and towards external parties, including through its institutional channels such as the company website and social networks.

2. Purpose and scope

The purpose of this Code is to state the ethical principles and rules of conduct that **THEMA. SRL** complies with in internal and external relationships, ensuring transparency and fairness in relationships with employees, collaborators, customers, partners and suppliers.

3. Regulatory References


UNI EN ISO 9001:2015 Standard

UNI EN ISO 14001:2015 Standard

UNI ISO 45001:2023 Standard

SA8000:2014 Standard

PAS 24000:2022

ELABORATED:	F002	5.2	SG	INT	MOD	02	rev 00	page	3	Of	Highlevel  Team Engineering and Management T.H.E.M.A. ARCHITECTURE & ENGINEERING Company Viale Palmiro Togliatti, 25 - 40132 BOLOGNA - Italy www.thema96.it - phone +39(0)51 5878411
Date:05/12/2024	Standard reference: ISO 9001:2015; ISO 14001:2015; ISO 45001:2023; SA 8000:2014; PAS 24000:2022										
OBJECT	Code of Ethics										

4. General Principles

4.1 Principle of Legality

THEMA. SRL carries out its business in full compliance with current legislation and the provisions contained in this Code. Employees and collaborators are required to comply with all applicable legal provisions and to maintain constant professional updating, also through training initiatives promoted by the company.

4.2 Principle of Fairness

Moral integrity and correctness are essential requirements for the company and its collaborators. Employees and collaborators are prohibited from establishing privileged relationships with third parties in order to obtain undue advantages, as well as from accepting or offering donations, favors or benefits, with the exception of objects of modest value or commercial courtesy gifts previously authorized by the company. The mere belief of operating in the interest of the company does not exempt one from respecting the rules and ethical principles of this Code.

4.3 Non-Discrimination

THEMA. SRL guarantees respect for human dignity in all its forms, rejecting any discrimination based on age, gender, race, sexual orientation, health status, political opinions, religion, culture or nationality.


At the same time, **THEMA. SRL** guarantees full respect for the rights of its employees and collaborators, refraining from any conduct likely to interfere with the exercise of their freedom to adhere to principles, practices or needs attributable to race, national or social origin, religion, disability, gender, sexual orientation, family responsibilities, union membership, political opinions or any other potentially discriminatory condition. The company promotes an inclusive environment and intercultural dialogue, protecting the rights of minorities and vulnerable individuals.

THEMA. SRL adopts a policy of absolute zero tolerance towards any behavior that is threatening, offensive, harmful to personal dignity or aimed at sexual exploitation or coercion. It is therefore expressly forbidden, in the workplace, to use gestures, language or physical contact of an inappropriate nature.

4.4 Confidentiality

THEMA. SRL , in compliance with the provisions in force regarding the protection of personal data, undertakes to guarantee the protection and confidentiality of the personal information of its employees and collaborators, ensuring compliance with all applicable regulations.

Employees and collaborators are bound by the obligation not to disclose or use, for purposes other than the performance of their work, confidential information of which they become aware by virtue of their duties.

ELABORATED:	F002	5.2	SG	INT	MOD	02	rev 00	page	4	Of	Highlevel  Team Engineering and Management T.H.E.M.A. ARCHITECTURE & ENGINEERING Company Viale Palmiro Togliatti, 25 - 40132 BOLOGNA - Italy www.thema96.it - phone +39(0)51 5878411
Date:05/12/2024	Standard reference: ISO 9001:2015; ISO 14001:2015; ISO 45001:2023; SA 8000:2014; PAS 24000:2022										
OBJECT	Code of Ethics										

They are also required to act in accordance with the confidentiality duties assumed by the company towards customers, partners and suppliers.

In particular, employees and collaborators must guarantee the maximum degree of confidentiality in relation to documents and information capable of revealing company know-how, commercial information and corporate transactions, in compliance with company policies and applicable legislation.

4.5 Diligence

THEMA. SRL bases its relationship with its employees and collaborators on principles of mutual trust and loyalty. Consequently, they are required to operate in the exclusive interest of the Company, in compliance with the values and provisions contained in this Code of Ethics.

Employees and collaborators must refrain from carrying out activities that may generate, even potentially, a conflict of interest with **THEMA. SRL**, avoiding pursuing personal interests in conflict with the legitimate interests of the Company.

If a conflict of interest situation exists or could reasonably arise, the employee or collaborator is required to promptly notify his/her hierarchical superior (area manager), so that the company can evaluate the case and possibly authorize the activity that is the subject of the potential conflict.

In the event of a violation of this obligation, the Company will adopt any measure deemed appropriate to eliminate the conflict of interest, reserving any action to protect its rights and interests.

4.6 Loyalty

THEMA. SRL, together with its employees and collaborators, undertakes to operate in compliance with the principles of loyalty and fairness in the competitive environment, fully complying with the national and community legislation in force on competition.


The Company recognizes that competition based on ethical and transparent principles represents a fundamental driver of innovation and development, as well as constituting a guarantee of protection for consumers and the entire community. Consequently, all activities carried out by employees and collaborators must be inspired by these values, avoiding any conduct that could alter the correct functioning of the market or compromise compliance with competition rules.

5. Relations with employees and collaborators

5.1 Staff selection

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ELABORATED:	F002	5.2	SG	INT	MOD	02	rev 00	page	5	Of	Highlevel  Team Engineering and Management T.H.E.M.A. ARCHITECTURE & ENGINEERING Company Viale Palmiro Togliatti, 25 - 40132 BOLOGNA - Italy www.thema96.it - phone +39(0)51 5878411
Date:05/12/2024	Standard reference: ISO 9001:2015; ISO 14001:2015; ISO 45001:2023; SA 8000:2014; PAS 24000:2022										
OBJECT	Code of Ethics										

The evaluation and selection of personnel by **THEMA. SRL** are conducted in compliance with the principles of correctness, transparency and equal opportunities, with the aim of ensuring the best balance between company needs and the professional profiles, aspirations and expectations of candidates.

The Company undertakes to prevent any form of favoritism in the selection process, adopting objective and meritocratic criteria, in full respect of the dignity of the candidates and in the interest of the good performance of the company organization.

The selected and hired personnel are informed, in a clear and complete manner, regarding the roles, responsibilities, rights and duties deriving from the employment relationship, also through the application of the provisions contained in this Code of Ethics.

5.2 Personnel Management

THEMA. SRL recognizes the fundamental value of its human resources and is committed to ensuring their protection and enhancement, constantly maintaining the conditions necessary for professional growth, development of skills and increase of knowledge of each employee and collaborator. To this end, the Company ensures the implementation of training and professional updating programs, as well as the adoption of any initiative useful to pursue this purpose.

The Company promotes the active participation of its employees and collaborators in corporate life, providing suitable tools to collect their opinions and suggestions, with a view to inclusive and shared management.

Without prejudice to the principle of maximum collaboration with **THEMA. SRL**, no employee or collaborator may be obliged to carry out tasks, services or favors that go beyond the contractual provisions and the role covered within the company organization.

The Company adopts a policy of absolute intransigence towards any form of mobbing, stalking, psychological violence or discriminatory behavior or behavior that is harmful to the dignity of the person, both within the workplace and in external contexts.


Relationships between employees and collaborators must be based on the principles of loyalty, fairness and mutual respect, in accordance with the values of civil coexistence and the protection of individual freedom.

6. Work environment

THEMA. SRL is committed to guaranteeing its employees and collaborators a healthy, safe and respectful work environment for the dignity of the person, adopting suitable measures for the prevention, reduction and elimination of potential accidents, injuries or occupational diseases.

Safety in the workplace is ensured by:

- strict compliance with the current legislative provisions on health and safety at work;
- the active promotion of safety culture, through information and training activities aimed at employees and collaborators;

ELABORATED:	F002	5.2	SG	INT	MOD	02	rev 00	page	6	Of	Highlevel  Team Engineering and Management T.H.E.M.A. ARCHITECTURE & ENGINEERING Company Viale Palmiro Togliatti, 25 - 40132 BOLOGNA - Italy www.thema96.it - phone +39(0)51 5878411
Date:05/12/2024	Standard reference: ISO 9001:2015; ISO 14001:2015; ISO 45001:2023; SA 8000:2014; PAS 24000:2022										
OBJECT	Code of Ethics										

- the preparation of documented procedures aimed at identifying, preventing, reducing, eliminating or, where necessary, managing risks to the health and safety of personnel;
- the written recording of all accidents that occur in the workplace and in company facilities, regardless of their legal nature (owned or leased).

Every employee and collaborator has the right to leave the workplace in the event of imminent and serious danger to their safety or that of others, without the need for prior authorization from the company.

THEMA. SRL undertakes to comply with current legislation, collective bargaining (where applicable) and industry standards regarding working hours, rest periods and holidays, guaranteeing an ordinary working week that does not exceed 48 hours, with adequate breaks. Overtime work, voluntary and not exceeding 12 hours per week, may be requested for market needs, always in compliance with the law and collective bargaining.

The Company ensures a decent wage, in accordance with legal or contractual standards, without disciplinary deductions except where required by law. The composition of the wage and allowances will be detailed and communicated in writing at each pay period, with increased pay for overtime, as required by law or collective bargaining.

7. Company Management

7.1 Compliance with procedures


Employees and collaborators of **THEMA. SRL** are required to strictly observe the company's internal procedures and instructions. They must operate within the limits of their respective authorization profiles and are required to retain all documentation necessary to track the actions undertaken in the name and on behalf of the company.

7.2 Accounting management

In the context of accounting management, employees and collaborators are required to operate in compliance with the principles of truthfulness, accuracy and transparency, in order to protect the reputation of **THEMA. SRL**, both internally and externally. Compliance with these principles allows the company to plan its operational strategies on the basis of a truthful and correct representation of its economic and financial situation.

All accounting entries must be supported by complete, clear and valid documentation, avoiding any form of omission, falsification or irregularity. If patrimonial or economic elements are recorded based on evaluations or estimates, such recordings must be made following criteria of reasonableness and prudence.

7.3 Protection of assets

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OBJECT	Code of Ethics										

Staff are required to perform their duties with the aim of rationalising and containing the use of company resources. They must also correctly apply the provisions relating to security, in order to protect hardware devices from unauthorised access, using the appropriate procedures, preventing potential damage to the rights of personal data protection of staff, customers, partners and suppliers. **THEMA. SRL**

8. External relations

8.1 Relations with Public Administrations

Relations with the Public Administration must be managed with the utmost clarity, transparency and collaboration, in full compliance with the law and in accordance with the highest moral and professional standards.

Employees and collaborators, unless expressly authorized, are not authorized to interact, in the name and on behalf of **THEMA. SRL**, with the Public Administration.

Employees and collaborators authorised to interact with the Public Administration are required to scrupulously comply with the provisions of this Code of Ethics, as well as the directives issued by the Company in relation to such activities.

8.2 Relations with political and trade union organisations

THEMA. SRL, in compliance with the provisions of the law in force and the principles of freedom of association, recognizes its employees the inalienable right to form, join and participate in trade union organizations of their own free choice, as well as to negotiate collectively through such organizations.


The company undertakes to ensure that personnel are adequately informed of this right and that the exercise of the same occurs in a context free from any form of discrimination, retaliation or prejudicial consequences towards workers.

THEMA. SRL will refrain from any interference in the constitution, functioning and management of trade union organizations, as well as in collective bargaining processes, in full respect of the autonomy of workers' representatives.

8.3 Relationships with customers, partners and suppliers

The Company's personnel interact with third parties in compliance with the principles of courtesy, competence and professionalism, in the awareness that their conduct directly affects the protection of the image and reputation of **THEMA. SRL**, as well as the pursuit of corporate objectives.

In this context, employees and collaborators are expressly prohibited from adopting unfair, deceptive or otherwise misleading behaviours to mislead customers, partners and suppliers regarding untrue or unfounded circumstances.

ELABORATED:	F002	5.2	SG	INT	MOD	02	rev 00	page	8	Of	Highlevel  Team Engineering and Management T.H.E.M.A. ARCHITECTURE & ENGINEERING Company Viale Palmiro Togliatti, 25 - 40132 BOLOGNA - Italy www.thema96.it - phone +39(0)51 5878411
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OBJECT	Code of Ethics										

Employees and collaborators must ensure, with diligence and continuity, the provision of timely and high-quality services, making every effort to limit any disruptions or delays as much as possible, in order to ensure the highest level of customer satisfaction.

Relationships with partners and suppliers must be based on the principles of loyalty, fairness and transparency. The selection of partners and suppliers must be made exclusively on the basis of objective criteria of cost-effectiveness, opportunity and efficiency, with an express prohibition on making choices based on subjective, personal evaluations or in any case in conflict with the interests of the Company.

Employees and collaborators must also implement all appropriate measures to ensure that customers, partners and suppliers also operate in compliance with the fundamental ethical principles established by this Code.

9. Internal control system

Compliance with the provisions of this Code is entrusted to the diligent, prudent and conscious supervision of each employee and collaborator, in relation to their role and skills within the company organization.

They are required to promptly report to their direct superiors (area manager) any fact or circumstance that could potentially be configured as conflicting with the principles and provisions of this Code.

The *management* of **THEMA. SRL**, adopts all necessary measures to stop any violations, being able to order the adoption of disciplinary measures within the limits and according to the methods established by the current legislation, in full respect of workers' rights, including those of a trade union nature.

10. Sanctioning System Guidelines


The internal control system adopted by **THEMA. SRL**, It is aimed at implementing tools and methodologies suitable for preventing and countering potential corporate risks, ensuring compliance not only with current regulatory provisions, but also with internal procedures and corporate *governance rules* .

Violation of the principles established by the Code of Ethics and the procedures established within the scope of internal controls compromises the relationship of trust between **THEMA. SRL**, and its directors, employees, consultants, collaborators of various kinds, customers, suppliers, commercial and financial partners. Consequently, each violation will be subject to a timely and incisive reaction by the Company, through the adoption of disciplinary measures that are adequate and proportionate to the seriousness of the contested conduct.

All subjects who, in any capacity, have relationships with **THEMA. SRL**, are required to consider the possible consequences deriving from any violations of the Code of Ethics and internal protocols. In relation to the seriousness of the conduct carried out, **THEMA. SRL**, reserves the right to adopt the measures deemed most appropriate, regardless of the possible exercise of criminal action by the Judicial Authority.

Without prejudice to the foregoing, conduct in violation of the Code of Ethics constitutes:

- **For employees** (clerks, executives and managers): serious breach of contract, with application of the disciplinary sanctions provided for by the relevant National Collective Labor Agreement (CCNL),

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OBJECT	Code of Ethics										

proportionate to the seriousness of the violation. The applicable sanctions include verbal reprimand, written reprimand, fine not exceeding three hours of pay, suspension from work and pay for up to a maximum of three working days, dismissal for just cause or justified reason. In the event of pending criminal proceedings or the execution of a measure restricting personal freedom against the employee, the Company reserves the right to order suspension from service and pay until the criminal proceedings are concluded or the restrictive measure is terminated;

- **For directors:** just cause for revocation of the mandate;
- **For collaborators :** cause for immediate termination of the contractual relationship in particularly serious cases;
- **For suppliers and partners:** cause for immediate termination of the contractual relationship in particularly serious cases.

The identification and application of sanctions will take place in compliance with the principles of proportionality and appropriateness with respect to the contested violation. In any case, the Company reserves the right to undertake all actions deemed appropriate to obtain compensation for damages suffered as a result of conduct in violation of the Code of Ethics.

11. Final provisions

Failure to comply with this Code will result in disciplinary action, taken in accordance with applicable legislation and company regulations.

Any updates or changes to this Code of Ethics will be communicated promptly to all interested parties, with suitable internal and external disclosure methods.