

IMPARTIALITY POLICY

DUEMME SPA, a company that deals in the field of Third-Party Non-Destructive Testing, RECOGNISES that meeting the requirement of IMPARTIALITY is an intransgressible condition for doing business. So its work is characterised by objectiveness, free from conflicts of interest, preconceptions or prejudices throughout all steps of its service provision process.

Duemme's goal is to provide a service meant to meet the Relevant Parties' needs and expectations; in this context, being seen as an impartial company is an essential condition that the company's shareholders and management strive to pursue each day. MAINTAINING and INCREASING this level of recognised perception is the foundation of future corporate strategic choices and daily operations.

duemme bears the greatest responsibility for the impartiality of its service activities on all levels of its organisation. The in-company work flows that the organisation chart is an expression of in terms of roles and responsibilities are the primary tangible example of the impartiality requirement's management at duemme. For this purpose, **duemme**:

- works with process and organisational management logic for managing the requirement;
- provides the Relevant Parties this impartiality management and preservation policy to show the inside commitment of its impartial and objective work. The rules of the impartiality requirement are published on its website and reviewed at least once a year or if the need should be felt. They integrate rather than replace the commitments taken up by all company collaborators with the signing of the job contract with reference to be made to the applicable National Contract, in addition to any other applicable compulsory regulations.
- Has, and sets in place, policies and procedures that guarantee activities are carried out objectively and impartially; in this context, it plans its internal flows so that they guarantee meeting the impartiality requirement. The organisation chart is an expression of the procedures implemented.
- It performs the tests requested with qualified technical employees according to the applicable national and international standards, trained and informed on the rules of conduct and applicable requisites under the impartiality requirement which it makes them read by signing a personal commitment to the company and Relevant Parties.
- It performs the tests requested with technical employees not under any type of business, financial or other kind of pressure that could compromise the company's image.
- It handles any other inspection activity that is not strictly operational with employees not under any type of business, financial or other kind of pressure that could compromise the company's image.
- It expresses the test results with Test Reports based on objective data from repeatable tests, authorised upon issuance by personnel who did not carry out the test as an additional guarantee and check of the internal process of service provision. The concept of repeatability also puts **duemme** in the conditions to show the Customer that the results are valid. Lastly, the type of test protects the company even more, further guaranteeing the requirement since it can offer customers a new test done with different yet equivalent non-destructive techniques.
- It enters into a contract with the Customer for each activity, basing its technical assessment on objective elements like applicable standards, in-company technical skills and means and resources available while it makes an ad hoc financial assessment based on its own current price list.

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To preserve the impartiality requirement, **duemme** does its own precise Risk Analysis of the aspects – taken as risks (threats) or opportunities (improvement) – linked to IMPARTIALITY of the company's work. The Risk Analysis is assessed at least once a year or if the need arises, and covers assessments regarding:

- in-company work flows (including resource management) on all corporate levels;
- every possible threat (risk) which, should it arise, could question the impartiality of the activities the company provides (for example: threats from personal interests, familiarity, intimidations or threats due to external pressures, etc.);
- every possible aspect of improvement (opportunity) that once implemented and verified could increase the faith in the company (for example: review of its in-company flows for specific orders or activities, addition of other inspection steps for specific, punctual activities or parts of them, etc.).

In its Risk Analysis **duemme** assesses:

- potential impartiality risks, including risks arising from test activities, repairs, design and construction of bunkers or inspection systems linked to core business activities;
- external relations;
- relations with its in-company employees;
- relations between its in-company employees and the outside (Relevant Parties, Customers, suppliers, institutions, etc.);
- adequacy of the planned and implemented work flows;
- adequacy of the structure, expressed as a corporate organisation chart;
- targeted measures to eliminate or cut risks concerning impartiality to a minimum;
- potential opportunities for improving impartiality;
- targeted measures to emphasise impartiality improvement opportunities;
- the best action plan to implement what emerged from the risk and opportunity analysis with adequate actions.

This statement delivered by **duemme**'s management is made public to all the Relevant Parties and posted in-company for all personnel to consult.

duemme's ownership shall guarantee application of the abovedescribed impartiality principles to the Relevant Parties.

Madignano (CR), on 04/01/2019