



## **INTRODUCTION**

This code represents the body of rules and obligations in the areas of ethics, independence and professional integrity.

The purpose of this code is to set out benchmark behavioural values, to promote the profession's image and enhance the quality of services furnished within the company.

It is the guarantor of our professional good practices, which are those that underpin our reputation. It emphasizes the importance that we place on our relations with our clientele, which are based on such values as honesty, fairness, responsibility and respect for our customers.

### **1. SCOPE OF APPLICATION**

The code of ethics applies to:

- All personnel of Automotive Technical Service S.r.l., ATS Sr.l. absl and ESCEM asbl.
- All interns and students working at one of the above three companies
- Subcontractors who carry out all or part of projects in the name of and on the behalf of the company

These persons are hereinafter referred to as "the employees".

### **2. COMPLIANCE WITH LAWS AND REGULATIONS**

Employees agree to comply with all laws and regulations, specifically those that govern the profession, as well as those in place for the protection of their health and safety and that of their customers and participants.

They shall also comply with the internal regulations and requirements of quality assurance systems used by the company that employs them or in all other companies in which they may be assigned to perform services.

### **3. CONFIDENTIALITY**

Employees agree not to disclose or to take all precautions to avoid any direct or indirect disclosure of confidential information they may come in contact with in the performance of their duties that concerns:

- The company to which they are tied by a work contract
- The employees of this company
- The companies, organizations, associations and other entities on behalf of which they are assigned to carry out work under a services contract
- The employees of such companies, organizations, associations and other entities
- The general public, on whose premises employees carry out work

The expression "confidential information" shall be understood as meaning all data, information or documents in any format whatsoever, dealing with technology, intellectual property and financial or business activities, other than where such information is not part of the public domain or that a judicial institution has requested that it be produced. In this latter case, the company cited in Article I must notify the owner of the information with regard to furnishing it under legal requirement.

The obligation of confidentiality applies for the entire duration of a work contract and continues beyond its termination.

Where subcontractors are used, employees who conclude contracts with these entities must ensure that they also are bound by a confidentiality agreement. Employees shall be certain to provide only the information to subcontractors that is strictly necessary for accomplishing their tasks.

Where employees are providing services for a customer who is also contracting with one of the companies listed in Article I, they are bound to confidentiality with relation to these companies.

This confidentiality obligation shall also apply to employees who may come into contact indirectly with information concerning customers who have contracted with the companies cited in Article I of the Ethics Code.

No confidential information, i.e. any information relating to orders, may be disclosed by employees over the telephone or any other means of communication to any person other than the concerned and officially recognized customer.

#### **4. INDEPENDENCE AND IMPARTIALITY**

Employees work at their jobs in a fully independent and impartial manner.

They guarantee that their work is done objectively and that it is based on information assembled by the employees themselves.

It is in no manner influenced by pressures of any kind and is not dependent on any third party, such as a supplier, installer, designer, etc. Employees are bound to refuse any assignment they feel may compromise their independence and impartiality.

Their skills are dedicated to serving the company and they engage in no secondary activity that could negatively impact their independence.

Employees are aware that the companies cited in Article I are distinct legal entities. As a consequence, they agree to act in a fully independent manner in providing work services on behalf of a customer who is contracted with one of these companies.

The company's services are accessible to all customers, regardless of size or membership in an association, provided that the product that is the subject of these services is not illicit, nor is it in conflict with public order or good values.

As part of the business conducted by ATS S.r.l. asbl, inspectors, prior to taking on assignments offered to them, agree to inform their supervisor of any relationship they may have ongoing or had in the past with the organization or company they are assigned to. This shall include consulting activities, family or personal ties or other links, either personally or through former employers, which could call into question their independence of judgment.

#### **5. INTEGRITY**

In order to guarantee employees' integrity on assignments, employees agree to refuse all payment, gifts, commissions or other personal benefits from any of their customers.



The following are not addressed by this article:

- Promotional items of little value
- Inexpensive presents received occasionally, which are accepted as normal courtesy dictates, such as Christmas gifts
- Invitations to dine with customers that facilitate business relations between the parties.

These exceptions are tolerated due to their low cost and possibility of reciprocity.

Employees are required to refuse such gratifications should they believe that these could alter or distort their individual judgment and their integrity.

In case of doubt, employees should contact the company's Compliance Officer.

## **6. EXEMPLARY CONDUCT**

Employees shall be aware that they represent the image of the company in performing their job. For this reason, they shall exhibit professional and exemplary conduct.

Employees are open to dialogue and share their experience with colleagues. They highlight their skills and honesty in relations with our clientele and promote the interests of other departments of the company.

They do not use their status as employees to achieve ends unrelated to the tasks they have been assigned.

The basic values guiding employees in their daily work lives are conscience, honesty, responsibility and probity.

## **7. SPECIAL PROVISIONS FOR ASSIGNMENTS AS AN INSPECTION ORGANIZATION**

Employees who perform inspections shall ensure compliance with the ministerial decree concerning the intervention of inspection organizations as part of the competencies and remit of the Labor and Mines Inspectorate.

They shall in particular ensure compliance of article 2.9 of this regulation:

"Should inspectors delegated by the inspection organization observe a defect or a situation that could present a danger to persons, they shall immediately inform operators via the most direct and rapid form of communication possible, without prejudice to the subsequent written report.

Inspectors concerned must furthermore in such situations indicate what measures should be implemented immediately and must ensure that all danger is removed and unacceptable risks are eliminated. Failing this, they shall inform the Labour and Mines Inspectorate without delay."

## **8. DUTY TO PROVIDE INFORMATION**

Employees that observe behaviour not conducive to this code of ethics have the responsibility of informing their supervisors as soon as possible. These supervisors, together with general management, shall decide how to continue with the assignment.

Date:

Name:

Signature: