



PYRAMID TEMI GROUP

Code of Conduct



PROTECT TRAVELLERS GLOBALLY

Message from the CEO

Pyramid Temi Group (PTG) provides responsible global Security and Travel Risk Management services to organisations with international operations.

PTG has adopted a long-term strategy based on quality assurance and commitment to ethics, sustainability, responsibility and respect for human rights.

This commitment has been consolidated by being a Founder Member ICoCA, a Signatory Member UN Global Compact, and the first Italian company to be ANSI/ASIS PSC.1-2012 certified. We also assist ISO, the International Organisation of Standardization in the development of Travel Risk Management standards.

This Code of Conduct is a fundamental part of our strategy. It serves as an introduction to our most important policies and principles, and is a guide to the PTG way of doing business, protecting and enhancing the reputation of our team and our company.

You are part of this commitment. Thank you for following our Code of Conduct, living our values, and fulfilling our purpose.

Roger D. Warwick
CEO



1- Who does this Code of Conduct apply

This Code of Conduct applies to all PTG employees and all other representatives acting on behalf of the company, including permanent and temporary employees, consultants, partners and sub-contractors.

2- Legal Compliance

We operate in full compliance with laws and regulations. We also conduct all of our business, and develop our policies and directives, in accordance with this Code of Conduct. Our public commitment does not explicitly exclude from its coverage any internationally recognized human rights that are not contained in the Code, provided that the Code does not violate the law.



3- Human Rights

We have a zero tolerance approach to all acts of sexual exploitation and abuse, child labor, forced labor, discrimination, harassment and gender-based violence.

PTG does not benefit from, nor allow their Personnel to engage in, or benefit from, sexual exploitation of any kind, and abuse or gender-based violence or crimes, either within the Company or externally, including rape, prostitution, sexual harassment, or any other form of sexual abuse or violence.

We require our personnel to remain vigilant for all instances of sexual or gender-based violence and, where discovered, report such instances to competent authorities, as stated in *Paragraph 38 of the International Code of Conduct for Private Security Service Providers*.

We treat everyone who works for PTG fairly and without discrimination regardless of race, sex, gender identification, sexual orientation, national origin, native language, religion, age, disability, marital status, citizenship, genetic information, pregnancy, or any other characteristic protected by law.



4 - Occupational Health and Safety and the Environment

Our employees, agency staff and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity.

We attach importance to safe and healthy working conditions. The health of our employees is in the foreground.

The work environment shall follow laws and regulations relating to occupational health and safety, and professionals shall ensure compliance with them. Degrading forms of work or any breach of legal health requirements are not permitted under any circumstances.

All employees shall act responsibly, identifying and preventing health and safety risks, as well as when performing their activities, ensuring the proper use of natural resources and the least possible impact of activities on the environment.



5 – Freedom of Association

We respect freedom of association. Where our employees wish to be represented by trade unions or works councils, we cooperate in good faith with the bodies that our employees collectively choose to represent them within the appropriate national legal frameworks.

We are committed to a constructive relationship with our employees and continuously strives to develop an open working environment.

6 – Conflict of Interests

A conflict of interest occurs when the interest of an individual or legal entity interferes or may interfere in the interests of PTG, generating a real or potential advantage.

PTG conducts permanent controls and monitoring aimed at mitigating and ensuring transparency and impartiality in the decisions and executions of day-to-day activities.



7- PTG avoids political involvement

PTG observes neutrality with regard to political parties and candidates. PTG name shall not be used to promote the interest of political parties or candidates.

Employees who engage in dialogue with governments and other public bodies to inform or influence public policy must do so responsibly and transparently in accordance with local laws.

8- Relations with public officials

PTG relations with the public sector shall be strictly institutional, ethical, transparent and integral, and carried out in an official manner, in accordance with the law.

It is expressly forbidden to receive, offer, promise or authorize, directly or through third parties, any undue advantage of any kind, whether in cash, goods or services, from/to public officials, political parties, candidates for public office or any politically exposed persons, in Italy or abroad, in order to obtain personal benefit or for PTG.



9- Fight against Corruption

We do not tolerate corruption – any form of bribery and corruption is strictly prohibited in our organization. This extends to all business dealings and transactions in all countries where we operate.

PTG and anyone representing PTG (including a third party) must not participate in or endorse any corrupt practices.

10- Fraud

We do not tolerate fraud and misuse of the company's assets. Fraud includes any act, as well as omission to act, with the purpose to deceive others to take actions resulting in economic harm to them.

Property, equipment, resources and funds must be used only for business purposes and not for personal gain.



11 - Intellectual Property

All interested parties shall take note that PTG intellectual property, such as know-how, ideas, trade secrets, patents, trademarks, domain names, design and copyrights, are valuable assets for the company. Such value can be lost or compromised if these assets are misused or wrongly disclosed.

12 - Confidential Information

Employees may from time to time have confidential information. This could include financial information, trade secrets, prices, sales and profits, strategies and plans, contractual information, customer and supplier lists, information about new products or any other non-public information about PTG. Confidential information must be protected, handled carefully and not shared with unauthorized third parties or publicly unless you have been specifically authorized to do so. The obligation to protect confidential information continues after termination of employment. This is also valid for information shared with us by customers, suppliers and other business partners.



13 – Data Protection and Privacy

PTG takes appropriate actions to protect personal data. We comply with the GDPR EU Regulation for storing, collecting and using personal data.

14 – Whistleblower

If an employee has a reasonable belief that an employee or sub-contractor of PTG has engaged in any action that violates any applicable law, or regulation, including those concerning accounting and auditing, or constitutes a fraudulent practice, the employee is expected to immediately report such information to the Project Executive Director.

If the employee does not feel comfortable reporting the information to the Executive Director, he or she is expected to report the information to the CEO of PTG.

All reports will be followed up promptly, and an investigation conducted. In conducting its investigations, PTG will keep the identity of the complaining individual as confidential as possible, while conducting an adequate review and investigation.



15 - Implementation and Compliance with the Code of Conduct

PTG expects managing directors, executives, employees and sub-contractors to observe this Code of Conduct.

All employees are obliged to familiarize themselves with the contents of this Code, to know it and to align their actions accordingly. The Code of Conduct forms the basis for our daily work.

PTG ensures that all employees are aware of and comply with the Code of Conduct. Each of our employees violating the Code of Conduct or other business-specific regulations must expect consequences - while respecting the principle of proportionality in the context of operational and legal provisions - even including the termination of employment and compensation claim.

16 - Doubts

Any doubts about this Code may be submitted through the following email address: ***pyramid@pyramid.it***





PROTECT TRAVELLERS GLOBALLY

Pyramid Temi Group S.r.l.

Via Rivani 83 - 40138 Bologna (Italy)

 +39051531804  pyramid@pyramid.it

 www.pyramidtemigroup.com