

# Code of Ethics

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## **1. General information**

The Code of Ethics is based on the principles of conduct and action that S.C.S. S.r.l. applies and that have led the behaviour of the company over the time and that have been shared and applied by all its directors, managers and collaborators. These principles are now summarized in this Code of Ethics and all the staff of the Company, as well as all the other persons that cooperates, are required to apply them and have them applied.

## **2. Principles of Conduct**

S.C.S. S.r.l. engages all preparation, intelligence and will to work with passion, enthusiasm and positive energy to respect and satisfy the principles of conduct.

### **2.1 Professional commitment**

The professional commitment in carrying out the assigned jobs consists in the permanent application of the skills and know-how acquired and brings to its updating. It implies the real contribution of everyone in respect of the environment, health and workplace safety.

### **2.2 Respect for people**

Respect for people is an absolute requirement for everyone's individual and professional development and the quality of people is essential for the growth and progress. We want the best from and for people, in the name of coherency and transparency. We develop and reward people with merit that experience the company with proactiveness, responsibility and team spirit. We reject the managerial and operational methods that favour personal satisfaction instead of the interest of the company.

### **2.3 Integrity**

Integrity requires everyone to behave honestly in the own professional activity. No compromise is admitted in terms of conflict between personal interests and the interests of the professional activity, both inside the company and in the relationship with third parties. We engage ourselves to spread the respect for environment, territory and health.

### **2.4 Loyalty**

Loyalty requires rectitude and honesty in the relations with colleagues and external collaborators. It implies the observance of the provisions and the internal rules of the Company, with transparency attitudes towards everyone and in all occasions.

## **3. Principles of action**

S.C.S. S.r.l. has defined the principles of action that conduct the activity of all its directors, managers and employees in the exercise of their functions. We want to be protagonists in the competitive scenario. Quality is what we believe in, our consolidated reliability is based on it. We work with economic sensitivity, in the respect of the law, environment, health and safety at work. We plan our

activities and control their results in the respect of the principles of transparency in administrative accounting responsibilities.

### **3.1 Respect for legality**

The Company applies, in every field, the laws and regulations in force in the country or countries in which it exercises its business, including its subsidiaries. Every employee, whatever is the qualification, is aware of, trained and informed about the implications of the laws related to his activity. In particular, S.C.S. S.r.l. prohibits to take deliberately advantage of any gaps in the regulations if the behaviour adopted is in contrast with the rules of the firm. The Company has arranged the necessary means to inform and train each collaborator about the laws, as well as on all the rules arising from the application of the business systems.

### **3.2 Respect for health and safety at work**

The Company takes the necessary measures to ensure the best protection of health, safety in the workplace and the prevention from all potential forms of risk for a constant improvement. This policy is applied equally both to the own employees and to the employees of external companies, when these have to make interventions at one of the sites of the Society. To develop and control compliance with the management of Health and Safety, the Company uses an implemented system, based on the updated and shared Risk Assessment Document that is periodically verified through consultations of third parties that refer to the “Testo Unico della Sicurezza” / single text on safety (Legislative Decree 81/2008), to international standards (ISO 45001: 2018) and to the Quality, Environment and Safety Policy internally adopted. All employees, collaborators and third parties are required to comply with all the measures required by the internal procedures and regulations of S.C.S. Srl regarding Health and Safety at work updated in accordance with current legislation, but also to contribute with proposals e reports.

### **3.3 Promote fair employment conditions and discourage any form of discrimination**

In S.C.S. Srl we undertake to keep a positive work place; we believe that the equal opportunities, fair treatment and diversity can help us to achieve our purposes. We do not discriminate on the basis of age, ethnic group, religion, disability, political views, trade-union opinions, sex, sexual orientation or any other personal feature legally protected. Any disrespect or harassment will not be tolerated.

### **3.4 Respect for environment**

The Company actively promotes the protection of the environment. It's many years that S.C.S. Srl is committed to improve the environmental impact of its activities, as well as prevent risks for the population and for the environment not only in compliance with current legislation, but considering the technological and scientific development.

These targets are also obtained thanks to the compliance with the “Testo Unico dell'Ambiente” / Consolidated Environmental Law (Legislative Decree 152/2006) and to the UNI EN ISO 14001 certification of the Environmental Management System obtained in 2016.

### **3.5 Respect for the community**

S.C.S. S.r.l. is aware about the influence, even indirect, that carrying out the business can have on the context in which it operates, on the economic and social development and on the wealth of the community; for this reason, the company intends to make its investments and its development in an environmentally friendly manner respecting local communities.

### **3.6 Compliance with the rules of free competition**

S.C.S. S.r.l. defends the value of fair competition, refraining from collusive behaviour and abuse of dominant position.

### **3.7 Relations with suppliers**

The choice of suppliers and of purchase of goods and services are made on valuations concerning competitiveness, quality, possession of technical / professional requirements, integrity and reliability. The stipulation of a contract with a supplier always has to be based on clear relationships, avoiding any form of dependence.

### **3.8 Relations with customers**

Honestly and respect towards customers and third parties play an important role in defining the ways to go. Business relations with customers have to be based on the mutual trust and satisfaction. Especially we guarantee towards customers such supply of products, services, assistance and consultation that exceed their expectations.

### **3.9 Clash of interests**

Each collaborator is required to avoid any possible clash of interest, with particular reference to personal interests. Each co-operator of S.C.S. S.r.l. must immediately report to the superior any situation that constitutes, generates or may even appear as a conflict of interest.

### **3.10 Protection of company information**

The collaborator has to know and implement the provisions of the company policies referred to the security of the information, including those in electronic form, to ensure their integrity, confidentiality and availability. Any information obtained from a collaborator in relation to the business is owned by S.C.S. S.r.l. The information is handled by S.C.S. S.r.l. with full respect for the confidentiality and privacy of the party concerned, in accordance with the current legislation.

In particular, the Company:

- has defined an organization for the processing of information that ensures the right separation of roles and responsibilities;
- subjects third parties, who intervene in the processing of information, to confidentiality agreements. Collaborators who become aware of information that are not public property have to use such information with the utmost caution and care, preventing disclosure to unauthorized persons both inside and outside the company.

### **3.11 Protection of company assets**

Each member of the staff is required to work diligently to protect the company assets, both physical and intangible, through responsible behaviour according to the operating procedures set up to regulate their use which has to be accurately documented. Particularly each collaborator has to:

- use scrupulously the assets given from the company;
- avoid improper and/or personal use of company assets that may cause any damage, efficiency reduction or, any other use in contrast with the interest of the company.

With regard to IT applications each employee is required to:

- scrupulously adopt the provisions of company safety policies, not to compromise the functionality and protection of IT systems;
- read and accept the provisions according to “Gestione dati informatici” (data processing management) of S.C.S. S.r.l.;
- do not browse websites with indecent and offensive contents and anyhow websites not in the interest of the Company.

## **4. Violations of the Code of Ethics**

### **4.1 Controls**

The Code of Ethics constitutes one of the founding elements of the internal / external control system that is inspired by the organizational model for the Administrative Responsibility of Companies and Entities ex Legislative Decree 231/2001 and subsequent amendments. The control system is oriented towards the adoption of tools and methodologies aimed at contrasting potential business risks, in order to fix a reasonable guarantee regarding the compliance with laws and with internal provisions and procedures. The management constantly ensures compliance of conduct with what is indicated in the Code and, if necessary, carries out specific verification and improvement programs.

### **4.2 Compliance with the Code of Ethics**

Executives and managers are responsible for ensuring that the expectations of the Company towards the members of the staff are from these understood and put into practise and they have to ensure that the commitments expressed in the Code of Ethics are implemented. S.C.S. S.r.l., in order to ensure the application of the Code of Ethics in respect of privacy and of individual rights, prepares information channels through which all those who come to know any cases of non-compliance with the Code can freely, directly and confidentially report to the right managerial figures of the internal hierarchy. Anyhow reports must be made in writing and in non-anonymous form. In case of occurred or attempted violation of the rules contained in the Code of Ethics, the Company has to ensure that no one in the workplace will suffer retaliation, illicit influence, inconvenience and discrimination of any kind, for having reported to the Vigilance the Supervisory Board the infringement of the contents of the Code of Ethics or of the internal procedures. After the signalling the Company will promptly make appropriate checks and, if necessary, appropriate sanctions.

#### 4.3 Report of forbidden conduct (whistleblowing)

It may happen that the employees of S.C.S. S.r.l. will notice a breach of this Code of Ethics, other internal regulations or legal norms. As soon as the employees become aware of such unlawful behaviour, they have the opportunity to report it immediately in the following ways:

- inform the supervisor;
- inform the managers/business managers;
- inform the management;
- e-mail at [info@scsstampi.it](mailto:info@scsstampi.it).

All received notices will be carefully checked and handled as confidential. To simplify the verification process, **S.C.S. Srl** requires the identity of the employee that makes the notice, the identity will be kept confidential but it is necessary to keep a control on such kind of communication and the trust on confidentiality avoiding improper actions that can disturb our organization. Every employee who reports infringements of laws, the Code of Ethics or any other internal regulations will not suffer any consequence due to this initiative. This applies also to the people who provide information to verify any illegal behaviour. Having said and confirmed the above, S.C.S. S.r.l. explicitly reserves the right to undertake disciplinary measures against employees who make guilty of false reports.

#### 4.4 System of sanctions

The infringement, where verified, of the principles established in the Code of Ethics and in the procedures provided by the internal protocols, compromises the relationship based on trust between the Company and its directors, employees in general, consultants, collaborators, customers, suppliers, commercial and financial partners. Violations will be prosecuted promptly and immediately, through the adoption of proportionate disciplinary and/or sanctioning measures, not excluding the right to take civil and/or criminal proceedings in cases where they constitute a crime. The verified violations of the Code of Ethics will result in specific measures adopted by the Management or competent functions. Coherently and in compliance with legal and contractual norms in force, violations may also bring to the dismissal of the person responsible of the violation. Any form of retort against those who have reported possible violations or requests for clarification about the application of the Code of Ethics also constitutes a violation of the Code itself. The effects of violations of the Code of Ethics and of the internal protocols must be taken into serious consideration by all those who, for whatever reason, have relations with the Company. For this purpose, the Company promotes the Code of Ethics and the internal protocols and / or procedures, as well as gives information about the sanctions provided in the event of violation and the methods and procedures for their application. The Company, in order to protect its image and its resources, will not have relations of any kind with people who do not intend to operate in compliance with current legislation and / or who refuse to behave in accordance with the values and principles set out in the Code of Ethics and to comply with the procedures and regulations provided by the connected protocols.

### 5. Application of the Code of Ethics

This Code of Ethics will be valid from the date of its release and will be spread as follows:

- posted on the company notice board;

- diffusion to all collaborators;
- copy to the main suppliers.

Pontoglio, 01 february 2021

General Manager  
Mario Rodegari 