

# Code of Ethics



**REVISION 1.0 (July 2019)**

Signature for acknowledgement  
and acceptance

CEO Cisa Production s.r.l

A handwritten signature in blue ink, appearing to read "Antonio", written over a horizontal line.



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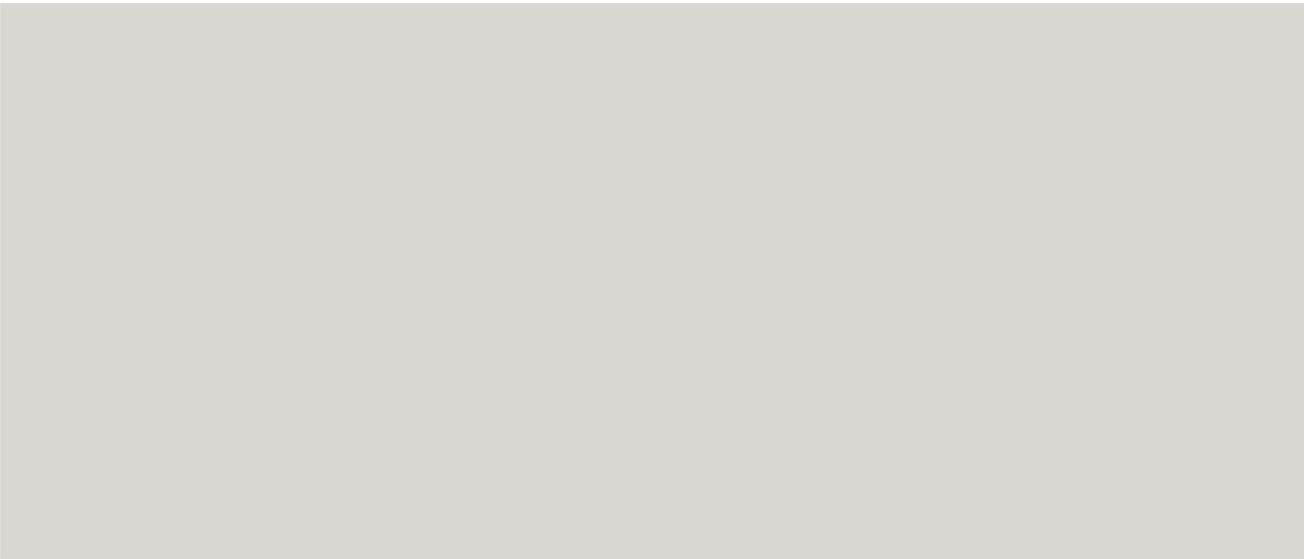
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## ***The Code of Ethics***

## 1. FOREWORD.

The Code of Ethics (hereinafter, for brevity, “Code”) as the set of rights, duties and responsibilities of those who adopt it (company, public body, consortium, cooperative, etc.) towards stakeholders represents, as a whole, the grundnorm, the “fundamental standard” of the system, adopted on a voluntary basis, in that it outlines and makes explicit the fundamental principles that inspire the very existence of the entity, even before its own activity.

This Code of Ethics (hereinafter, for brevity, “Code”), in particular, has been conceived to ensure that the principles and values of Cisa Production s.r.l. (hereinafter the “Company”), as also conveyed by the parent company (the “Holding”), are clearly stated and constitute the basic element of our corporate culture.

Compliance with the rules set out in this Code is essential for the very existence, even before the correct functioning, reliability and image of the Company, and is consequently required of both employees and external collaborators. The Code, therefore, identifies the ethical commitments and responsibilities that the Company undertakes in the context of its activity, within its mission of “producing values by consolidating values”.

The purpose of this statement of principles, which are in harmony with those issued from time to time by the Holding, is to direct the recipients to respect the values that shape all the Company’s activities, acting as a guide for every type of operation and behaviour in all relations both inside and outside the Company.

In carrying out its activity, the Company acts in compliance with the principles of freedom, dignity of the human person and respect for diversity.

It favours a work environment that, inspired by respect, fairness and collaboration, allows the involvement, engagement and accountability of Employees and Collaborators with regard to the specific objectives to be achieved and the ways to pursue them.

The primary purpose of this Code is therefore to clearly define the set of values and principles that the Company recognizes, accepts and shares, ensuring a program of dissemination, information and awareness on the provisions of this Code and its application to the persons to whom it refers, so that Directors, Employees and all those who work for the Company can attend to their duties according to a constant and strict compliance with the principles and values contained therein.

It is the Company’s duty to supervise compliance with the Code and to adopt, for this purpose, all necessary prevention and control measures.

## 2. FIELD OF APPLICATION AND STRUCTURE OF THE CODE.

The rules contained in the Code are intended to provide the Company, its employees and collaborators, whether directors, auditors, freelance professionals, consultants or business partners, as well as its associates, shareholders or investors (the “Recipients”) with the principles and lines of conduct to be followed in the conduct of business, in interpersonal relations between Recipients and in relations with the Company’s external subjects, understood as all individuals, groups, private or public associations or institutions, including, without limitation, customers and suppliers, whose contribution in commercial, administrative or financial terms in general is required in order to achieve the Company’s purpose, or who in any case have an interest or role in its pursuit and all those who, for whatever reason, work for the Company, even if only occasionally (the “External Subjects”).

The principles and provisions of the Code constitute exemplifying specifications of the general obligations of diligence, fairness and loyalty, which qualify the fulfilment of work activities and behaviour in the workplace.

They are binding for all members of the governance bodies (hereinafter “Directors”), for all persons linked by subordinate or independent employment relationships with the Company (hereinafter “Employees”) and for all those who work for the Company, whatever the relationship, even temporary, that is established with it (hereinafter “Collaborators”).

The Directors, Employees and Collaborators are hereinafter jointly referred to as “Recipients”.

The Code – which must be brought to the attention of the Recipients in order to ensure its constant availability by everyone - is structured according to the following scheme:

- general principles and values;
- rules of conduct relating to personnel;
- rules of conduct towards third parties;
- sanctions regime;
- final provisions.

All employees are required to know the rules laid down in this Code, to refrain from any conduct contrary to them, to contact their superiors for clarifications or complaints, to cooperate with the company structures responsible for verifying violations and not to hide the existence of the Code from their counterparts.

In contractual relations, the counterparts must be informed of the existence of rules of conduct and must undertake to comply with the principles, values and rules of this Code as applicable to them.

Violation of the provisions of this Code may result in the loss of the Company's fiduciary relationship with the Recipient who has committed it, with legal consequences on the bond with the Company.

The principles and rules contained in this Code integrate the rules of conduct that each Recipient is required to observe, also in compliance with the general obligations of diligence, fairness and loyalty that must distinguish work performance, also pursuant to articles 2104 and 2105 of the Italian Civil Code and collective negotiations.

These are, in any case, principles and lines of conduct that, as such, cannot in any way be interpreted as derogating from or limiting any legal or contractual provisions that may govern individual relationships and specific matters.

This Code is therefore not intended to replace or override applicable national or international laws and regulations, but is based on the premise of compliance with all national and international laws, internal and community regulations, and on the adoption of an ethically correct and fair conduct by the Recipients.

### 3. GENERAL PRINCIPLES AND VALUES.

#### 3.1. INFORMATION AND TRAINING.

The Company shall inform all Directors and Employees of the provisions and application of the Code, recommending full compliance. In particular, the Company shall take charge, also through the designation of subjects to whom specific internal functions shall be attributed, by means of specific deeds:

- of disseminating the Code to the Recipients;
- of explaining the provisions contained therein;
- of verifying effective compliance with the Code;
- of updating the provisions of the Code with regard to the needs that arise from time to time or in order to implement the instructions of the Holding Company.

#### 3.2. RESPONSIBILITY.

Each Recipient carries out his or her work and performs his or her services with diligence, efficiency and fairness, making the best use of the tools and time available to him or her and assuming the responsibilities related to duty fulfilment, in compliance with current regulations, procedures and competences established by the Company.

The Recipients, also in compliance with the legal provisions of the countries in which they operate, must refrain from engaging in any conduct contrary to the rules contained in the Code and must promptly report the following information to the persons responsible for receiving it:

- any information regarding the violation, or potential violation, of the provisions contained in the Code;
- any request for non-compliance with or deviation from the Code submitted to them.

It is the duty of the heads of each corporate department to make their subordinates, colleagues and collaborators aware of the importance of compliance with the provisions contained in the Code and to direct them to the necessary observance and implementation.

#### 3.3. FAIRNESS.

All the actions and operations carried out and the behaviours adopted by each of the Recipients in the performance of their functions or tasks are inspired by legitimacy from a formal and substantial point of view, in accordance with current regulations and internal procedures, as well as by fairness, cooperation, loyalty and mutual respect.

The Recipients shall not use, either for personal purposes or to the undue advantage of third parties, any information, goods and equipment at their disposal in the performance of their function or assignment.

Recipients are required to diligently comply with current laws, the Code and internal regulations.

Under no circumstances the pursuit of the Company's interest may justify conduct that is unfair and does not comply with current legislation.

Employees must refrain from competing with the latter (article 2105 of the Italian Civil Code), must comply with company rules and observe the precepts of this Code, compliance with which is also required pursuant to and for the purposes of article 2104 of the Italian Civil Code (Diligence of the employee).

Code of Ethics  
Each Recipient does not accept, or put pressure, or provide recommendations or warnings, for himself/herself or for others, which may be prejudicial to the Company or confer undue advantages for themselves, the Company or third parties.

Each Recipient also rejects and does not make undue promises and/or offers of money or other benefits, unless the latter are in line with established practice and, in any case, always of modest value and not related to requests of any kind.

### 3.4. RESPECT FOR THE INDIVIDUAL.

The Company promotes respect for the fundamental rights of the individual, in accordance with the United Nations Universal Declaration of Human Rights, and is committed to ensuring that its activities never result in a violation of these rights.

For this reason, the Company promotes respect for the psychophysical integrity of the person and guarantees working conditions that respect individual dignity and a safe and healthy working environment.

The Company promotes the professional growth of its Employees and is committed to avoiding any discrimination based on age, gender, sexual orientation, health status, race, political orientation and religious beliefs.

It recognises and respects the freedom of its employees to associate or not with any political or trade union organisation.

Under no circumstances will the Company make use of work performed under conditions of constraint, nor of child labour, in accordance with the I.L.O. (International Labour Organization) Conventions 138 of 1973 and 182 of 1999.

### 3.5. CONFLICT OF INTEREST.

In the exercise of any business activity, situations of conflict of interest, even if only potential, must always be avoided, this is situations in which an employee, a member of the corporate bodies, an external collaborator or a partner pursues an interest different from that of the Company and to the detriment of the same or takes personal advantage of business opportunities provided by the company.

The Recipients undertake to ensure that any decision concerning the Company's activity is taken in the exclusive interest of the Company, avoiding situations of conflict of interest between personal affairs and activities carried out in fulfilment of their work for the Company that may compromise objectivity and impartiality of judgment or choice.

The Recipients must promptly report to the Company any relationship or situation relevant to business activities in which personal interests or those of persons related to them (such as, for example, family members, friends, acquaintances) are involved.

The Recipients shall pursue, in the fulfilment of their activity and/or assignment, the general objectives and interests of the Company, in compliance with current regulations and with this Code, informing without delay the heads of departments, or in any case their contact persons, of the situations or activities in which they may have interests in conflict with those of the Company (or where such interests are held by close relatives) and in any other case where there are reasons of convenience.

The Recipients respect the decisions taken by the Company in this regard, refraining, in any case, from carrying out operations in conflict of interest.

### 3.6. CONFIDENTIALITY AND PRIVACY POLICY.

The Recipients ensure the utmost confidentiality regarding news and information constituting the Company's assets or inherent to the Company's activities, in compliance with the provisions of the law, with the current regulations of this Code and with internal procedures, keeping secret and confidential any productive, organizational and managerial news and information, company information and technical-industrial experience, including commercial experience, of which they have become aware by way of the activity carried out.

The Company undertakes to protect all information relating to the Recipients, generated or acquired within the corporate structure and/or in the management of business relations, and to avoid any improper or undue use of the same.

The Company pays particular attention to the implementation of the provisions on the protection and safeguarding of personal data provided for by national and supranational regulations, committing itself to adopt and implement, where these concern areas of interest, the guidelines drawn up by the Privacy Authority for the Protection of Personal Data.

In particular, it is not allowed, either directly or indirectly:

- a. to disclose company information to others, including other employees, unless they have a legitimate need for it because of their work and, if they are not employees, have agreed to keep it confidential;
- b. to use company information for any purpose other than that for which it is intended;
- c. to obtain and/or provide copies of documents containing company information or remove documents or other archived material or copies of the same from workstations, except in cases where this is necessary to perform specific and expressly authorised tasks;
- d. to improperly destroy company information.

All Company documents, e-mail messages and other materials containing Company information, as well as all materials prepared using such documents, are the property of the Company and must be returned to the Company at the Company's request or upon termination of employment.

Documents that is not required to be kept must be destroyed in a manner that complies with company policies and, if they contain personal data, in compliance with current regulations on the processing of personal data.

### 3.7. PROTECTION OF PRODUCT QUALITY.

The Company is committed to ensuring the quality of the manufactured and marketed products by means of:

- a careful selection of raw materials and their suppliers;
- an accurate management of production processes, regulated through defined procedures, prepared on the basis of current environmental regulations;
- a constant control of all operational processes aimed at obtaining the finished product, implemented by the relevant company departments in compliance with all legal requirements and the specific sector regulations.

The Company expressly prohibits the marketing of products other than those declared and the production and marketing of products with characteristics not permitted by law.

### 3.8. ENVIRONMENT.

Aware of its responsibility towards present and future generations, the Company inspires its activities to the principle of protecting the environment and the resources it offers and pursues the objective of safeguarding the safety and health of all those who, for various reasons, are affected by the company's activities, which will be managed in full compliance with current national and EU legislation on prevention and protection.

It meets the expectations of the community in relation to environmental issues, taking every appropriate measure of protection and caution and condemns any form of damage and harm to the eco-system.

Research and technological innovation must be dedicated in particular to the construction and promotion of industrial plants, products and processes that are increasingly compatible with the environment and characterized by an ever-increasing attention to the safety and health of all those who, for whatever reason, come into contact with the Company's activities.

The Company, in accordance with its mission of "creating value by consolidating values", aims to raise awareness and train its Employees and Recipients in general in the promotion and application of environmental rules. Employees' and Recipients' initiatives aimed at exemplary behaviour in respect of the environment are encouraged and supported.

Should damage to the environment occur that can be attributed to the Company's activities or to the conduct of its employees and collaborators, the Company undertakes to prevent any possible illegal activity from leading to further consequences and, in any case, to ensure safety, decontamination and, where possible, restoration of the state of the premises.

### **3.9. OCCUPATIONAL SAFETY.**

The Company is scrupulous in complying with current regulations on occupational safety and, in particular, those contained in Legislative Decree no. 81 of 9 April 2008 and subsequent amendments.

It therefore constantly monitors its systems and equipment, wherever they are located and operating, exceeding the legal obligations and the protection of imminent risks, to ensure maximum safety and quality of its services. The Employees and Collaborators of the Company ensure maximum availability towards the Manager or anyone who may come to carry out inspections and controls on behalf of the appointed Bodies.

If one of the Recipients finds any anomalies or irregularities in this matter, he or she shall promptly inform the internal manager of the risk prevention and protection service, the manager of the corporate department to which he or she belongs and the human resources (HR) manager.

The operating principles in the field of workplace health and safety are better specified in specific provisions in the continuation of the Code.

### **3.10. FAIRNESS AND TRANSPARENCY IN ACCOUNTING.**

The Company undertakes to behave correctly, transparently and collaboratively, in compliance with the law and with company procedures, in all activities aimed at drawing up the financial statements and other corporate communications, in order to provide shareholders and third parties truthful and correct information on the Company's economic, equity and financial situation.

It also ensures the regular functioning of the Company and the corporate bodies, guaranteeing and facilitating any form of control over the company's management required by law, as well as the free and regular deliberation of the shareholder's meetings decisions.

It also undertakes to promptly, correctly and in good faith make all communications required by law and regulations to the supervisory authorities, without hindering the exercise of their functions.

In the course of any possible inspection activity, the Company undertakes to offer maximum collaboration in carrying out the inspections, making promptly and completely available all documents whose acquisition is deemed necessary.

The Company proceeds with the distribution of profits or advances on them, the reduction or increase in share capital, mergers or demergers, in compliance with the regulations in force.

## **4. RULES OF CONDUCT FOR EMPLOYEES**

### **4.1. EMPLOYEE SELECTION AND FORMALISATION OF THE EMPLOYMENT RELATIONSHIP.**

The Company respects the principle of equality and equal opportunities in the selection and recruitment of personnel. Any form of favouritism, nepotism or patronage is rejected during the selection process and objective and commonly shared evaluation criteria are used. The information requested from candidates during the selection process is only that which is necessary to verify the aspects foreseen in the personal profile, in full respect of the candidate's private life.

The Company is committed to maximum collaboration and transparency towards new recruits: all information relating to the employment relationship is presented to the candidate so that his acceptance of the position is based on an effective understanding of all its contents.

## 4.2. PERSONNEL MANAGEMENT.

Access to roles and assignments is determined solely on the basis of skills and abilities.

Each division manager can and must request from his or her employees only services consistent with the exercise of his or her duties and with the organisational and production requirements of the Company.

The working week shall not exceed the maximum duration permitted by the applicable legal provisions.

Overtime work, in general, will be contained within the limits of the National Collective Labour Contract (CCNL) and the law.

## 4.3. PROVISIONS ON ILLEGAL IMMIGRATION AND TO CONTRAST LABOUR EXPLOITATION.

The Company undertakes, in compliance with the relevant regulatory provisions, to not establish any employment relationship with subjects without a regular residence permit and to not carry out any activity aimed at facilitating the illegal entry into Italy of illegal immigrants. In particular, any conduct aimed at the illegal introduction of family members is prohibited. The entry of family members may be facilitated only in compliance with the regulations in force on the so-called family reunification, refraining from any conduct aimed at circumventing the provisions and purposes of the Consolidated Act on Immigration.

The Company bans all forms of labour exploitation. In particular, it prohibits the use, hiring or employment of labour, including through brokerage activities, subjecting workers to conditions of exploitation and taking advantage of their state of need.

It undertakes to scrupulously comply with the regulations in force regarding remuneration and working hours, committing itself to:

- pay a salary proportionate to the quantity and quality of the work and in accordance with the provisions of national or territorial collective bargaining;
- ensure that working hours are respected, regulating overtime, rest periods, including weekly rest periods, compulsory leave and holidays;
- guarantee respectable working conditions, also by excluding surveillance methods that are not permitted by law or in any case may be harmful to the personality of the individual and do not serve the purpose of satisfying objective and recognized needs.

## 4.4. SAFEGUARDING EMPLOYEES WHO REPORT WRONGDOINGS.

The Company undertakes to safeguard its employees and/or collaborators who report to the Supervisory Body that may be established or, in the absence thereof, to the governance bodies or to the head of Human Resources (HR), in the manner and in the cases provided for by Law no. 179 of 30 November 2017, any relevant unlawful conduct pursuant to Legislative Decree no. 231 of 8 June 2001, or who file legal complaints or charges, however named, to the Judicial Authority or to another Authority that is obliged to report the same conduct, ensuring that they are exempt from any type of negative consequences such as, for example, sanctions, dismissals, demotions or other organizational measures having direct or indirect negative effects on working conditions that are a consequence of the said report, as well as to protect them from any discriminatory or retaliatory acts of any kind related to the same.

The Company undertakes, also by creating appropriate channels for the delivery of confidential information, to protect the confidentiality of the reporting party and the content of the information, to the extent that such confidentiality is permitted by law and until the loss of confidentiality is functional to allow the subject of these reports to be able to exonerate himself.

## 4.5. USE OF RESOURCES.

All Recipients are responsible for the appropriate use and safeguarding of the corporate assets entrusted to them and undertake to use them solely in the interest of the Company.

Corporate assets also include documents, work tools, systems and equipment and any other tangible and intangible assets (including intellectual property rights and trademarks), technologies in use, strategies and projects for product development, strategies and business plans, customer directories, personnel data, marketing and sales programs, company telephone directories, organization charts, product cost data, product pricing policies, financial and accounting data and any other information relating to the Company's business, customers and employees.

In order to ensure the security of the Company's assets and to guarantee work continuity, the Company applies access control systems to structures and information systems.

In order to ensure the security of the Company's assets and to guarantee continuity of work, the Company applies access control systems to its facilities and information systems.

No employee may use the available computer equipment, including online networks and his or her company e-mail address, in a manner contrary to the law, or in a way that could cause damage to the Company's reputation, or in such a way as to compromise the efficiency and effectiveness of operations or the security of the Company or of third party systems.

#### **4.6. PROHIBITION OF POSSESSION OF PORNOGRAPHIC MATERIAL.**

It is expressly forbidden to hold, in the premises of the Company, its relevant facilities, warehouses, or in any other place that in any case can be traced back to the Company, or in the mass storage devices relevant to its IT systems, albeit remote, pornographic material or virtual images made using images of minors under the age of eighteen. By virtual images we mean images created using graphic processing techniques not associated in whole or in part with real situations, whose quality of representation makes them appear as real situations.

The Company will consider the violation of this prohibition to be particularly serious.

### **5. RULES OF CONDUCT TOWARDS THIRD PARTIES.**

#### **5.1. CODE OF CONDUCT TOWARDS SUPPLIERS.**

The selection of suppliers and parties with whom to establish business relations in general shall be based on objective criteria, such as the quality and price of the marketed goods, guarantees of timeliness and efficiency in providing a service, seriousness and proven ability. In supplier and commercial relations in general, the Company undertakes:

- a. to follow internal procedures for the selection and management of relations with suppliers, as well as, in general, in the selection of parties with whom to enter into business relations;
- b. not to preclude any supplier company or any person interested in doing business, if they meet the necessary qualifications, from competing for a supply or entering into a contract with the Company, adopting objective evaluation criteria in the selection process, in accordance with declared and transparent procedures;
- c. to obtain the collaboration of suppliers and parties with whom they have business relations in constantly ensuring that the needs of the Company's customers are satisfied in terms of quality, cost and delivery times, to an extent at least equal to their expectations;
- d. to maintain a frank and open dialogue with suppliers and parties with whom they do business, in line with good business practices.

## 5.2. PAYMENTS.

Any payment required for a product or service must be made directly to the Company and not to an individual and must be duly recorded in the appropriate books of account by the corporate department responsible for this. Likewise, any payment will be made by the Company, in compliance with corporate procedures, only upon receipt of the required accounting and/or fiscal documentation, and only where it is attributable to the activity of the Company.

## 5.3. COINS, BANKNOTES AND TAX STAMPS.

Any persons in charge of the management of money and revenue stamps operating on behalf of the Company must check all handled coins, banknotes and tax stamps and immediately withdraw them from circulation, in case of ascertained or even suspected counterfeit.

In the event of receiving coins, banknotes or values deemed to be counterfeit or altered, the Directors must be immediately informed so that they can file the appropriate charges.

## 5.4. MANAGEMENT OF MONEY, GOODS OR OTHER UTILITIES.

It is absolutely forbidden to engage in economic-financial transactions that involve the replacement or transfer of money, goods or other utilities deriving from crime; or to carry out other operations in relation to these transactions, in such a way as to hinder the identification of their criminal origin.

It is also forbidden to use the aforementioned assets in any economic or financial activities.

## 5.5. RELATIONS WITH SHAREHOLDERS.

The Company's relations with shareholders are maintained by each Director and each Employee, whatever their function or position, or, where appropriate, by each Collaborator, in compliance with the regulations in force and on the basis of the general principles of fairness and loyalty.

## 5.6. PUBLIC FUNDINGS.

In the event that the Company may benefit from financing of any kind, granted by national and/or supranational public entities, it prohibits and counteracts any artifice or deception (including by means of false declarations or omissions) carried out by one of its members, by any means, to unduly obtain such financing, grants or provisions charged to the public administration or to the Entity that grants it, or to divert its restricted special purpose.

## 5.7. RELATIONS WITH THE JUDICIAL AUTHORITY AND WITH THE PUBLIC ADMINISTRATION IN GENERAL.

The Company actively collaborates with the Judicial Authority, its auxiliaries, law enforcement agencies and any public official or public service officer, in the context of inspections, controls, investigations or judicial proceedings.

Recipients are expressly forbidden to promise gifts, money or other benefits to the competent judicial authorities or to those who materially carry out the aforementioned inspections and controls, in order to undermine their objectivity of judgement in the interest of the Company.

It is also forbidden to put pressure, of any kind, on the person called to make statements before the Judicial Authority or other administrative bodies, in order to induce him/her not to make statements or to make false statements.

It is forbidden to assist anyone who may have carried out a criminal offence in avoiding the authority's investigations or to elude its inquiries.

In any case, relations with the Public Administration must always be based on the utmost fairness, loyalty and transparency.

The Company does not accept in any way that the pursuit of its objectives is carried out through corrupt practices or in any case contrary to the law.

The Company categorically rejects the possibility that the pursuit of its objectives may be carried out through corrupt or in any case unlawful practices.

## **5.8. GIFTS, PRESENTS AND BENEFITS.**

No form of gift, present or benefit is allowed that may be interpreted as exceeding normal business practices or courtesy, or that may in any case be aimed at gaining preferential treatment in the conduct of any activity related to the Company.

In particular, any form of gift, present or benefit to Italian or foreign public officials, or to their family members, is prohibited, even if inapt to affect their independence of judgement or to induce any advantage.

This rule, which does not allow exceptions even in those countries where offering valuable gifts to business partners is customary, concerns both gifts, presents or benefits promised or offered, and those received.

The Company refrains from practices that are not permitted by law and by commercial practice or ethical codes, if known, of the companies or entities with which it has relations.

When clearly not suitable to influence independence or to induce any advantage, only gifts of modest value are allowed, which must however always be properly documented and authorized by the function manager.

Recipients who receive gifts or benefits not provided for in this provision are required to notify the function manager and, where present, the Supervisory Board, so as to allow them to assess its appropriateness and take the measures deemed appropriate.

## **6. RULES OF CONDUCT REGARDING HEALTH AND SAFETY IN THE WORKPLACE**

### **6.1. PURPOSES.**

The Company considers the protection of safety in the workplace an absolute value, to be preserved and safeguarded by any technically possible means, using the tools and/or knowledge provided by science and the experience of the moment, including not only life and physical integrity, but also other fundamental aspects of the personality (for example, the dignity of the worker).

Occupational safety is therefore the primary objective that the Company intends to achieve and, to this end, it shares, implements and adopts the principles and indications contained in the Directive of the Council of the European Communities of June 12, 1989, n. 89/391/EEC.

In particular, the Company is committed to ensuring the safety and health of workers in all work-related aspects, and undertakes to do so even if it makes use of skills (services and people) external to the company, its facilities or plants.

The Company will therefore make the whole corporate organisation to feel responsible, so that everyone, in his or her own role and taking into account his or her own duties and competences, provides the necessary contribution to the achievement of the set objectives.

### **6.2. EMPLOYER'S OBLIGATIONS REGARDING RISK ASSESSMENT AND PROVISION OF APPROPRIATE SAFETY MEASURES.**

The Company, through the person designated as Employer, undertakes:

- a. to adopt the necessary measures for the protection of the safety and health of workers, including the prevention of occupational risks, information and training, and the establishment of an organisation and the necessary means;
- b. to constantly update these measures, taking account of changing circumstances and aiming to improve existing situations.

The Employer shall implement the above measures based on the following general prevention principles:

- a. avoid hazards;
- b. assess hazards that cannot be avoided;
- c. contrast hazards at source;
- d. adapt work to the individual, in particular as regards the design of workplaces and the choice of work equipment as well as working and production methods, with the aim of alleviating monotonous and repetitive work and reducing the effects of such work on health
- e. take account of technical developments
- f. replace what is hazardous with what is not or is less hazardous;
- g. plan prevention, aiming at a coherent overall policy which covers technology, work organization, working conditions, social relations and the influence of factors related to the working environment
- h. give priority to collective protective measures over individual protective measures;
- i. give appropriate instructions to workers.

In addition, the Employer, taking into account the nature of the company's and/or production plant's activities, undertakes:

- a. to assess the risks to the safety and health of workers, including in the choice of work equipment and chemical substances or products and/or preparations and in the arrangement of workplaces. Following this assessment, and if necessary, the prevention activities, the working and production methods adopted by the employer must: ensure a better level of protection of the safety and health of workers; be integrated into the overall activities of the company and/or plant at all hierarchical levels;
- b. to take into account the worker's safety and health capabilities when assigning him or her a task;
- c. to ensure that the planning and introduction of new technologies are the subject of consultation with workers and/or their representatives, regarding the consequences on the health and safety of workers as for the choice of equipment, the reorganisation of working conditions and the impact of factors in the working environment;
- d. to take appropriate measures in order to ensure that only workers who have received appropriate instructions are allowed access to areas presenting a serious and specific hazard.

In the event that workers from more than one company are present in the same workplace, the Company undertakes to cooperate with the other Employers, so that:

- a. the provisions relating to safety, hygiene and health are implemented;
- b. the means of protection and prevention methods for occupational risks are coordinated;
- c. there is complete information (both from the Employers and the workers involved) about the risks that distinguish the performance of work activities.

Measures related to safety, hygiene and health at work may in no circumstances involve the workers in financial cost.

### **6.3. PROTECTION AND PREVENTION SERVICE: OBLIGATIONS OF THE EMPLOYER AND OF THE MEMBERS OF THE PREVENTION AND PROTECTION SERVICE**

Without prejudice to the obligations regarding risk assessment and the preparation of the related safety measures, the Employer undertakes to designate one or more workers who shall be responsible for the protection and prevention of occupational risks.

In order to fulfil the obligations set out in this Directive, the designated workers must be given adequate time. In any case:

- a. the designated workers must have the necessary skills and use the required means;
- b. the number of designated workers and external persons or services consulted must be sufficient to carry out the protection and prevention activities, taking into account the size of the company and/or production plant and/or the risks to which workers are exposed, as well as the distribution of risks throughout the company and/or production plant.

#### **6.4. OBLIGATIONS RELATING TO FIRST AID, FIREFIGHTING, EVACUATION ON WORKERS AND SERIOUS AND IMMEDIATE DANGER.**

The Company, in the person of the Employer, undertakes:

- a. to adopt all necessary measures for first aid, fire-fighting and evacuation of workers, as appropriate to the nature of the activities and the size of the company and/or production plant, taking into account the presence of other persons;
- b. to organise the necessary relations with external services, in particular for first aid, emergency medical assistance, rescue and fire-fighting.

The Company, in the person of the Employer or his delegate, must in particular designate the persons in charge of applying these measures for first aid, fire fighting and evacuation of workers. These workers must be trained, be in sufficient number and have adequate equipment, taking into account the size and/or specific risks of the company and/or the specific production unit.

The Company must:

- a. inform, as soon as possible, all workers who are or may be exposed to the risk of serious and immediate danger about the risk itself and of the provisions adopted or to be assumed for their protection;
- b. give instructions and arrange for workers to be able, in the event of serious, immediate and unavoidable danger, to cease their activities and/or reach safety, leaving the workplace immediately;
- c. except for duly justified exceptions, refrain from requiring workers to resume their activities in a work situation where serious and immediate danger persists.

A worker who, in the event of serious, immediate danger which cannot otherwise be avoided or contained, moves away from the workplace and/or from a dangerous area, shall not suffer any prejudice for his or her conduct, nor shall he or she be blamed for it.

#### **6.5. FURTHER OBLIGATIONS OF THE EMPLOYER.**

The Company also undertakes:

- a. to carry out a risk assessment on safety and health at work, including risks concerning groups of workers exposed to particular hazards;
- b. to establish the protective measures to be taken and, if necessary, the protective equipment to be used;
- c. to keep a list of accidents at work;
- d. to draw up, for the competent authority and in accordance with national laws and/or practices, reports on accidents at work involving its workers.

#### **6.6. INFORMATION ACTIVITIES FOR WORKERS.**

The Company shall ensure that workers and/or their representatives in the company and/or in the production plant or in the individual production unit receive all necessary information concerning:

- a. safety and health risks as well as the protective and preventive measures and activities concerning both the company and/or the production plant in general and each type of workplace and/or function;

- b. measures taken in application of the employer's obligations regarding first aid, fire-fighting and evacuation of workers.

The Company undertakes to ensure that the Employers of the workers of external companies and/or production plants who operate in its facilities or its production plant receive adequate information, intended for the workers in question, regarding the points referred to in the previous paragraph.

The Company shall ensure that workers or workers' representatives with specific responsibility in protecting the safety and health of workers have access, in order to carry out their duties:

- a. to the risk assessment and the protective measures for safety and health at work;
- b. to the list and reports on accidents at work;
- c. to information from protection and prevention activities, from inspection services and from the competent bodies responsible for safety and health.

## 6.7. OBLIGATIONS FUNCTIONAL TO THE CONSULTATION AND PARTICIPATION OF WORKERS.

The Company undertakes to consult workers and/or their representatives and to allow the participation of workers and/or their representatives in all matters relating to safety and health protection at work, this implying both the consultation of workers and the right of workers and/or their representatives to formalise proposals.

Workers or workers' representatives with specific responsibility for the prevention of the safety and health of workers shall take part in a balanced way and shall be consulted in advance and in good time by the employer with regard to:

- a. any action that may significantly affect safety and health;
- b. the designation of workers in charge of the prevention and protection service and of those who must deal with First Aid, fire-fighting and are responsible for managing the evacuation of workers;
- c. information to workers concerning workplace safety;
- d. the possible use of expertise (persons or services) external to the company and/or production plant;
- e. the planning and organisation of appropriate training on safety and health at work.

Workers' representatives with a specific responsibility for the protection of the safety and health of workers have the right to ask the employer to take appropriate measures and to submit proposals to that effect in order to contain any hazards to workers and/or to remove the causes of danger.

Workers and workers' representatives may not suffer prejudice because of their respective activities referred to in this Code.

The Company undertakes to grant sufficient exemption from work, without loss of pay, to workers' representatives holding a specific function with regard to the protection of workers' health and safety, and to provide them with the necessary means to exercise their rights and functions.

Workers' representatives must have the opportunity to submit their comments during visits and inspections carried out by the competent authority.

## 6.8. OBLIGATIONS FUNCTIONAL TO TRAINING OF WORKERS.

The Company undertakes to provide each worker with sufficient and adequate training on health and safety, in the form of information and instructions, on the occasion:

- a. of hiring;
- b. of a transfer or change of function;
- c. of the introduction of new work equipment or a change in equipment;
- d. of the introduction of a new technology, specific to his or her workplace or function.

This training must be adapted to the evolution of hazards and the emergence of new hazards and, if necessary, periodically repeated.

The Company undertakes to ensure that workers from external companies and/or production plants who operate in its facilities and/or production plants have received adequate instructions regarding health and safety risks during their activity in its facilities or production plant.

Code of Ethics  
Workers' representatives with a specific responsibility for the protection of the safety and health of workers are entitled to appropriate training. The training shall take place during working hours and may not be at the expense of the workers or their representatives.

## 6.9. OBLIGATIONS OF WORKERS.

It is the obligation of each Recipient who carries out his or her work on behalf of the same, or in any case frequents the workplaces of the Company itself, to take reasonable care of his or her own safety and health as well as that of the other persons who may be affected by his or her actions or omissions at work, in accordance with his or her training and the instructions provided by the employer.

To this end, and in accordance with their training and the instructions provided, workers must in particular:

- a. make correct use of machinery, equipment, tools, dangerous substances, transport equipment and other means;
- b. make correct use of the personal protective equipment supplied to them and, after use, return it to its proper place;
- c. refrain from putting out of service, neutralising, changing or moving arbitrarily safety devices fitted in particular to machinery, equipment, tools, installations and facilities, and to use such safety devices correctly;
- d. immediately report to the employer, and/or the workers who have a specific responsibility for the protection of the safety and health of workers, any work situation which, on reasonable grounds, they believe may constitute a serious and immediate danger to safety and health, as well as any defect detected in the protection systems;
- e. enable workers with a specific responsibility for the protection of the safety and health of workers to carry out, for as long as may be necessary, all the tasks or fulfil all the obligations imposed by the competent Authority to protect the safety and health of workers at work;
- f. contribute, together with the Employer and/or the workers with a specific responsibility for the protection of the safety and health of workers, in making the environment and the conditions in which they carry out their work as safe as possible.

## 6.10. SECURITY OF INFORMATION SYSTEMS

In carrying out its business activities, the Company uses IT and data transmission tools and services in full compliance with the relevant regulations, contractual provisions and internal policies and procedures.

## 6.11. COMPLIANCE WITH INTELLECTUAL AND INDUSTRIAL PROPERTY RIGHTS

In carrying out its business activities, the Company guarantees the constant and comprehensive respect of industrial and intellectual property rights legitimately held by third parties, as well as of the laws, regulations and conventions protecting such rights. In particular, employees and collaborators, in fulfilling their activities, are obliged to refrain from any conduct that may constitute usurpation of industrial or intellectual property rights of third parties.

## 6.12. EFFICIENCY

The principle of efficiency requires that in every work activity the cost-effectiveness of the management of the resources used in the provision of services is achieved and a commitment is made to offer a service that is adequate to the customer's needs and based on the most advanced standards.

## 6.13. SPIRIT OF SERVICE

The principle of the spirit of service implies that each Recipient of the Code be always oriented, in their own behaviour, towards sharing the company mission aimed at providing a service of high social value and utility to the community, which must benefit from the best quality standards.

## 6.14. APPROPRIATE BEHAVIOUR

Within the scope of the duties and tasks assigned, any person working on behalf of the Company must maintain a dignified and appropriate behaviour oriented towards respecting the sensitivity of others and the image of the Company. Therefore, any behaviour that may damage the reputation of the Company towards its interlocutors is prohibited.

## 6.15. ABUSE OF AUTHORITY

The Human Resources function, within the limits of available information, adopts appropriate measures to avoid favouritism, nepotism or forms of patronage both in the selection and hiring phases and in the management of employment relationships.

It is an abuse of the position of authority to request, as though they were a duty to a superior, services, personal favours or any behaviour that constitutes a violation of this Code of Ethics.

Company representatives and other persons or entities with an objective possibility of influencing company choices must absolutely avoid using their position, even implicitly and indirectly, to influence decisions regarding the hiring of personnel in favour of relatives, friends and acquaintances, for personal purposes of any kind and with discriminatory criteria.

In the case of work reorganization, the value of human resources is safeguarded, providing, where necessary, training and/or professional requalification, and ensuring, where possible, that the costs arising from work reorganization are distributed as evenly as possible between all employees, consistently with the effective and efficient exercise of the company's activities.

Employees who believe they have been discriminated against may report the incident to their supervisor who will proceed to ascertain any actual violation of the Code.

Personnel are hired on the basis of regular employment contracts, as any form of employment relationship that does not comply with or in any way circumvents the provisions in force is not permitted.

## 7. SANCTIONS REGIME.

### 7.1. EMPLOYEES AND DIRECTORS.

Compliance with the rules of the Code must be considered an essential part of the contractual obligations of employees, pursuant to and for the purposes of Article 2104 of the Italian Civil Code.

Violations of the Code may constitute a breach of the primary obligations of the employment relationship or a disciplinary offence, in compliance with the procedures of the current legislation and, in particular, of the Workers' Statute, with all legal consequences, also in relation to the preservation of the employment relationship, and may, in any case, result in the payment of damages deriving from them.

In the event of the adoption of an Organisation and Management Model ("OMM") drawn up in accordance with the provisions of Legislative Decree no. 231 of June 8, 2001, Directors who are not employees will also be subject to disciplinary powers and will be required to submit to the Company's sanctioning power, exercised in the manner and under the conditions established in the OMM.

Sanctions, also against Directors, must meet the requirements of effectiveness, proportion and prevention.

## 7.2. THIRD PARTIES.

Compliance with the Code may be considered an essential part of the contractual obligations assumed by Collaborators and/or by parties having business relations with the Company where contractual clauses to this effect are expressly provided for.

Code of Ethics  
Violation of the rules of the Code may constitute a breach of contractual obligations, with all legal consequences, also with regard to the termination of the contract and/or the assignment, and may lead to compensation for damages deriving from it.

To this end, as far as possible, the Company will make sure to bind the Collaborators and/or third parties with whom it is in business relations with, also with respect to existing relations, to comply with the provisions of the Code, taking care of spreading the awareness of it.

## 7.3. DISCIPLINARY SANCTIONS FOR UNFOUNDED REPORTS.

The Company, without prejudice to the further consequences of the law and the criminal and civil actions taken by the assignees, undertakes to sanction from a disciplinary point of view reports that are unfounded and that are made with intent or gross negligence.

## 8. FINAL DISPOSITIONS AND ENTRY INTO FORCE.

This Code, an acknowledgement of the Company's practices, is approved by the Board of Directors and will be in force, for each of the Recipients, 10 (ten) days after delivery of a copy of the same.

Any changes and/or additions to the same shall also be approved by the Board of Directors and promptly circulated to the Recipients.





We care about life

## CODE OF ETHICS



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