

**FIMIC S.r.L.**

**ORGANIZATION, MANAGEMENT AND CONTROL MODEL**

(pursuant to Legislative Decree 8 June 2001 no. 231)

**ANNEX - 1 -**

Code of Ethics

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## **1. INTRODUCTION**

This Code (hereinafter referred to as “Code of Ethics”) expresses the ethical commitments and responsibilities in the carrying out of the business and of the company activities undertaken by all those who have relationships of any kind with FIMIC Srl (hereinafter simply “FIMIC” or “Company”).

The set of ethical values that this Code is based upon represent a guarantee for safeguarding the respectability and the integrity of economic and human assets, which contribute to promoting in various ways the image of FIMIC both internally and toward the third parties with which it collaborates.

The company believes in the value of work and considers legality, fairness and transparency of action essential prerequisites for reaching its economic, productive and social goals.

The Code of Ethics is based upon the main regulations and guidelines existing on the topic of corporate governance, human rights and environment, such as, by way of example, the Universal Declaration of Human Rights of the United Nations, the Charter of the fundamental rights of the European Union, the decent work standards provided for by the ILO (International Labour Organization) agreements, the OECD (Organization for Economic Co-operation and Development) Guidelines addressed to multinational companies, the Anti-Bribery national and supranational regulations (e.g.: OCSE Anti-Bribery Convention, Legislative Decree 231/2001, Foreign Corrupt Practices Act, Bribery Act, Loi Sapin 2, Ley Organica, etc.) and the ISO 14001 standard on environmental matters.

The Board of Directors of FIMIC on 16/10/2020 has, furthermore, approved the INTERNAL REGULATIONS OF THE PERSONNEL, with the purpose of regulating work and of reciprocal collaboration of all personnel employed in the company (employees of the administrative offices, the production department and the technical office).

Both the Internal regulations of the personnel and the Code of Ethics, albeit formally constituted by documents external to the corpus of documents of the Organization, Management and Control Model pursuant to Legislative decree 231/01, are to be intended as an integral part of the same.

FIMIC endeavours to ensure that the companies with which it collaborates adopt, towards the market, a policy of quality and safety of the product, respecting environmental protection.

All the Recipients undertake to pursue their objectives with loyalty, seriousness, honesty, competence and transparency, in full respect of the laws and of the regulations in force.

### **RECIPIENTS**

By adopting of the Code of Ethics, the company intended to define moral values, clear rules and procedures to comply with.

The Code of Ethics is addressed to:

- Members forming the collegial bodies
- Employees (both fixed-term and open-ended)
- Project collaborators
- External and internal consultants
- Suppliers of goods and services

- Any other subject that can act in the name and on behalf of the company both directly and indirectly, permanently or temporarily or those who establish relations or relationships with the company and operate to pursue its objectives

The recipients of this Code of Ethics must learn its contents and respect its precepts.

The Code of Ethics will be made available to them, in accordance with what is specified below.

The Management, or a representative, of the company is responsible for the effective implementation of the Code of Ethics and its dissemination within and outside the organization.

The company employees, besides complying with the regulations in force and with the provisions provided for by collective bargaining – where applicable -, undertake to adapt the ways of performing their work to the goals and to the provisions established by the present Code of Ethics.

This both in relationships within the company and in those with subjects external to the company and, especially, with Public Administrations and with the other public authorities.

An essential requirement of every relationship of fruitful collaboration with the company consists in the respect, by the other recipients, of the principles and of the provisions contained in this Code of Ethics.

In this sense, during stipulation of contracts or agreements with the other recipients, the company provides its interlocutors with a copy of this document.

#### **PRINCIPLES OF REFERENCE**

Conformity to laws, transparency and managerial fairness, good faith, trust and cooperation with the stakeholders and zero tolerance towards corruption are the ethical principles upon which FIMIC is based – and from which it derives its models of conduct – with the aim of competing effectively and fairly on the market, improving the satisfaction of its customers, increasing value for the shareholders and developing the skills and the professional growth of its human resources.

In particular, the belief of acting in some way to the advantage of the company does not justify the adoption of conducts contrasting with the aforementioned principles.

All the Recipients, without distinctions and exceptions, are, therefore, committed to following and having these principles followed within the context of their functions and responsibilities. Such commitment requires that the subjects with which the Company has relationships for any reason, also act in its regard with rules and modalities based upon the same values.

## **THE CODE OF ETHICS**

FIMIC has deemed proper and necessary to adopt and issue a Code of Ethics, which makes explicit the values to which all Recipients must conform, accepting responsibilities, arrangements, roles and rules for the infringement of which they take personal responsibility within and outside of the company.

Knowledge of and compliance with the Code of Ethics by all those who act in favour and in the interest of FIMIC are thus primary conditions for the transparency and reputation of the Company. FIMIC, furthermore, undertakes to disseminate the Code of Ethics among all those with which it has business relationships demanding, on their part, knowledge of and compliance with the rules contained therein.

In the context of the internal control and risk management system, the Code of Ethics constitutes a management tool for ethical conduct in company business and an effective element of company strategy and organization. The responsibility for implementation and updating of the Code of Ethics is the duty of the Directors; the Recipients have the duty of reporting possible related non-compliances or failed application to the Supervisory Board pursuant to Legislative Decree 231/01 of FIMIC.

The Code of Ethics has, furthermore, the aim of establishing and making binding, for the company, the principles and rules of conduct relevant for the purposes of reasonable prevention of the crimes listed in Legislative Decree 231/2001.

The Code of Ethics, considered as a whole and jointly with all the specific implementation procedures approved by the company, is considered as an integral part of the subordinate employment contracts, both in place and to be entered into, pursuant to Article 2104 of the Civil Code (Diligence of the employee).

Breach of its provisions may amount, therefore, to an offence of disciplinary nature and, as such, it will be prosecuted and sanctioned by the company pursuant to and in accordance with Article 7 (Disciplinary sanctions) of Law no. 300/1970 (Workers' Statute - Regulations on the protection of the freedom and dignity of workers, trade union freedom and trade union activity, in the workplace and employment regulations) and may entail compensation for the damages caused to the organization.

With regard to collaborators, consultants and self-employed workers (specified below among the recipients) who perform their work in favour of the company and to the other third-party subjects, the undersigning of this Code of Ethics or of an extract thereof or, in any case, adherence to the provisions and to the principles provided for therein represent an essential requirement of the entering into of contracts of any nature between the company and said subjects. The provisions thus undersigned or, in any case, approved, also by conclusive facts, constitute an integral part of these contracts.

In view of what has been hitherto described, possible infringements by the subjects mentioned in the previous paragraph of specific provisions of the Code of Ethics, based upon their severity, may justify withdrawal by the company from the contractual relationships in place with said subjects and may also be identified beforehand as causes of automatic termination of the contract pursuant to Article 1456 of the Civil Code (express termination clause).

## **2. GENERAL ETHICAL PRINCIPLES OF CONDUCT**

The principles listed below are deemed to be fundamental: therefore, our organization undertakes to respect them in relation to anyone.

It is moreover indispensable that such values do not remain mere propositions but be translated into conducts and behaviours intrinsic to the company.

As organization and as individuals, all the recipients, in the work environment, are required to apply them in a proper manner in operations and in relationships, both internal and external.

The fundamental values underlying the activity of the company are:

- Integrity in complying with Laws and Regulations
- Rejection of all discrimination
- Centrality, development and enhancement of human resources and equity of the authority
- Territorial rooting
- Transparency and business ethics
- Quality
- Diversity
- Legality and combating terrorism and crime

The company expects that such values define its identity, unite employees and collaborators to the global organization.

### **CONFORMITY TO LAWS AND REGULATIONS**

FIMIC acts in full compliance with the laws of the countries in which it carries out its activity, in conformity to the principles set out by the Code of Ethics.

Moral integrity is a constant duty of all Recipients.

Recipients must therefore, in the context of the respective competences, know and observe the laws and the regulations in force in all the countries in which the company operates. Such context also includes attention to and compliance with the regulations that govern competition, both in the national market and at international level.

The relationships of the Recipients with Public Authorities and Institutions must be based upon the utmost fairness, transparency and collaboration, in full respect of the laws and of the regulations and of their institutional functions.

The company undertakes to produce and supply quality services and to compete on the market according to principles of fair and free competition and transparency, maintaining fair relationships with all public, governmental and administrative institutions, with the citizenry and with third-party companies.

Said commitment must also apply to the consultants, suppliers, customers and to anyone who has relationships with our organization. The company will not initiate nor carry on any relation with any party that does not intend to abide by this principle.

## **CENTRALITY, DEVELOPMENT AND ENHANCEMENT OF HUMAN RESOURCES AND FAIRNESS OF THE AUTHORITY**

The company recognizes the centrality of human resources and deems that an essential factor of success and development consists in the professional contribution of the people who operate therein.

The company has always placed professionalism and individual contribution of people at the centre of its action, giving continuity to a style of relationship which aims to recognize each individual's work as fundamental element of corporate and personal development.

At the same time, the company places at the centre of its everyday action dialogue, exchange of information – at any level -, enhancement and professional updating of its collaborators and establishing a company identity and the relative sense of belonging.

Such value is reflected:

- In the creation of a work environment capable of enhancing the contribution and the potential of the individual by means of gradual empowerment of the personnel
- In the realization of a relationship system that favours teamwork over hierarchical relationships
- In the everyday effort aimed at sharing skills and knowledge also through the use of innovative systems

The company gives the highest importance to those who work within its organization, contributing to its development, as it is precisely through human resources that the company is able to provide, develop, improve and guarantee optimal management of its services.

Without prejudice to the legal and contractual provisions on the subject of workers' duties, professionalism, dedication to work, loyalty, collaborative spirit, mutual respect, sense of belonging and morality are required of employees. For these specific aims, reference is made to the INTERNAL PERSONNEL REGULATIONS of FIMIC, which for said purpose is deemed an integral part of this document.

In the management of the contractual relationships which imply the establishment of hierarchical relationships, our company undertakes to ensure that authority is exercised with equity and fairness and that all forms of abuse are avoided: in particular, the company ensures that authority is not transformed into an exercise of power that is detrimental to a person's dignity and autonomy.

Such values must always be safeguarded when making choices which regard work organization.

## **TRANSPARENCY AND BUSINESS ETHICS**

The history, identity and values of the organization are expressed in business ethics based upon:

**Reliability:** intended as guarantee of absolute seriousness in the projects launched, in the transactions and in the commitments undertaken;

**Solidity:** relating to an organization that has an established asset base, as shown by its long-lasting activity;

**Transparency:** consequent to the conception of the social role that imposes not merely respect of principles and of ethical works, but also enactment of ways that allow the community of reference and social actors to access information to be able to reconstruct its activity;

**Fairness in the contractual context:** preventing, in the relationships in place, anyone who acts in the name and on behalf of the company from trying to take advantage of contractual loopholes or of unforeseen events with the aim of renegotiating the contract with the sole purpose of exploiting the position of dependency or weakness in which the interlocutor finds themselves;

**Protection of competition:** refraining from collusive, predatory conducts and abuse of position.



### **3. ETHICAL PRINCIPLES TOWARDS THE STAKEHOLDERS**

#### **RELATIONSHIPS WITH CUSTOMERS**

The company's primary object is full satisfaction of the needs of its customers.

In this context, the organization ensures the customer the best performance of the assignments entrusted and is constantly striving to propose more and more advanced and innovative solutions in a perspective of integration, efficacy, efficiency and cost-effectiveness.

The company provides accurate, complete and truthful information to enable the customer to make a rational and aware decision. It protects the privacy of its customers according to the relevant regulations in force, undertaking not to disclose or disseminate personal data, without prejudice to the obligations of law.

In addition, the company adopts a communication style based upon efficiency, collaboration and courtesy.

#### **RELATIONSHIPS WITH FINANCIAL INSTITUTIONS**

The organization has relationships with financial institutions based upon fairness and transparency, with a view to creating value for the company.

For this reason, financial institutions are chosen in relation to their reputation, also for their adherence to values comparable to those expressed in this Code of Ethics.

#### **RELATIONSHIPS WITH SUPPLIERS**

##### **Suppliers of goods and services**

The company defines with its suppliers relationships of collaboration, in compliance with the regulations in force and with the principles of this Code of Ethics, paying attention to the best professional standards, to the best practices in matters of ethics, of protection of health and of safety and of respect for the environment.

##### **Internal and external consultants**

Consultants are chosen in relation to their professionalism and reputation, as well as for their reliability and adherence to values comparable to those expressed in this document.

Relationships with consultants are based upon transparent agreements and upon a constructive dialogue aimed at reaching common objectives, consistent with the regulations and principles of this Code of Ethics.

#### **RELATIONSHIPS WITH THE PUBLIC ADMINISTRATION**

The term Public Administration means any person, subject, interlocutor qualifiable as Public Official or Person in Charge of a Public Service that operates on behalf of the central or peripheral Public Administration, or of supervisory Public Authorities, Independent Authorities, Community Institutions as well as of private partners licensees of a Public Service.

In the relations with the Public Administration, the company bases its conduct upon, and adapts it to, the principles of fairness and honesty. On this basis, the individuals appointed by the company to follow any negotiation, request or institutional relationship with the Public Administration, Italian or foreign, must not, under any circumstances, attempt to inappropriately influence its decisions or engage in unlawful conduct, such as the offer of money or of other utility, which may alter the impartiality of judgement of the representative of the Public Administration.

The individuals appointed by the company organization to manage relationships with any authority of the Public Administration must verify that the information given by any means and for any reason is truthful, accurate and correct. The individuals who are permitted to have direct contacts with the Public Administration on behalf of the company are the only individuals expressly indicated by the company for such purpose.

No other collaborator may engage in relationships of any type with the Public Administration for the activities inherent to the company's corporate purpose.

When implementing tenders, the subjects appointed by the company must comply with the law and the relevant rules.

#### **Employment Relationships with former employees of the Public Administration.**

Recruitment of former employees of the Public Administration who, in the performance of their functions, were engaged in relationships with the company or their relatives and/or relatives-in-law, takes place in strict compliance with the standard procedures defined by the organization for the selection of personnel.

The definition of other employment and/or consultancy relationships with former employees of the Public Administration, or with their relatives and/or relatives-in-law, also takes place in strict compliance with the standard procedures.

#### **Grants and financing**

Contributions, grants or funding obtained from the European Union, from the State or from another Public Body, even if of modest value and/or amount, must be utilized for the purposes for which they were requested and granted.

The company prohibits the recipients of this Code of Ethics from using the funds received from the Public Administrations and/or from Multisectoral funds for purposes other than those for which they were disbursed.

Analogously, in case of participation in public tender procedures, the recipients of this Code of Ethics are required to operate in compliance with the law and with proper commercial practice, avoiding in particular inducing the Public Administrations to act unlawfully in favour of the company.

The organization undertakes to prevent acts that direct the recipients of this Code of Ethics to carry out actions capable of obtaining unlawful advantages.

It is also unlawful conduct to use altered or falsified statements or documents or to omit information or, in general, carry out contrived or fraudulent acts, aimed at obtaining licenses, authorizations, funding, contributions from the European Union, the State or another Public body.

## **RELATIONSHIPS WITH PUBLIC ENFORCEMENT AUTHORITIES**

The recipients of this Code of Ethics undertake:

- To comply scrupulously with the provisions issued by the competent institutions or Public Enforcement Authorities for compliance with the regulations in force in the sectors linked to the respective areas of activity
- not to submit, in the context of ongoing investigations with Institutions and/or Public Enforcement Authorities, applications or requests containing untrue statements with the purpose of obtaining public funds, contributions or subsidized funding or of unduly obtaining licenses, authorizations, permits or other administrative acts
- To comply with every request coming from the above-mentioned Institutions or Authorities in the context of the respective enforcement functions, providing— where requested— full collaboration and avoiding obstructive conducts

## **RELATIONSHIPS WITH COMPETITORS**

FIMIC believes that a modern and free market can be considered such only if there is a significant degree of fair competition.

The Competitors are part of the set of variables that an advanced company must contemplate in the choices and strategies it will define for its development. Therefore, also this aspect must be addressed, bearing in mind the principles of reference of the Code of Ethics.

Integrity, fairness, transparency, compliance with the laws and vibrant competition are the elements that must characterize the activity of the commercial area of our company in relation to the market.

For such purpose, FIMIC undertakes to respect the principles of fair competition sanctioned by national and Community regulations, undertaking to comply with the following rules:

- adopt decisions on prices, terms and conditions of sale, business and marketing strategies in line with market conditions and production costs. There is no justified reason to discuss such latter aspects with a Competitor;
- avoid concluding agreements with suppliers that may influence or compromise, with their business conduct, free competition in the market in which FIMIC operates;
- not to attempt to obtain information on competitors through unlawful methods such as corporate espionage or corruption;
- not to adopt conducts whose primary or exclusive aim consists in hindering a competitor;
- never ask subjects who are candidates for employment or already employed to reveal information on former employers, customers or professional partners, if such revelations may infringe the obligations of confidentiality and fairness.

#### **4. ETHICAL PRINCIPLES PERTAINING TO PERSONNEL**

FIMIC grants every employee their own distinctive value for their capacities and potential.

Employees are considered a competitive resource in relation to which the company is careful to guarantee a work environment that favours the conditions for the development, both personal and professional, of all.

Besides what is set forth explicitly below, formal reference is also made to the INTERNAL REGULATIONS OF THE PERSONNEL of FIMIC, which must thus be considered an integral part of the present document.

#### **PROTECTION OF HEALTH, SAFETY AND WORK ENVIRONMENT**

FIMIC considers the dissemination of safety culture to be a crucial element.

It seeks to reduce the risks for the physical integrity of all its Collaborators also through information and training as a tool of empowerment and guarantee of protection of health and of safety in the workplaces, in compliance with the provisions of the applicable regulations.

The company undertakes to respect and keep the work environment entirely compatible with protection of the health of its employees, seeking not to create conditions of distress, also psychological, also combating any discriminatory or persecutory attitudes.

The designated functions take action so that the environment conditions are always monitored and within the norm, as well as compliant with the laws in force on the subject, adopting all the tools and the controls necessary for this purpose.

FIMIC undertakes to carry out adequate training, information and instruction on the subject of health and safety, to develop, in its employees and collaborators, awareness of all the risks linked to the performance of their work, and to promote responsible conducts by everybody.

Recipients, in particular, must:

- Take care of their own health and safety and that of the other individuals present in the workplace, who incur the effects of their actions or omissions, consistently with the training, the instructions and the means provided by the employer;
- contribute, together with the employer, the HSO, the safety managers and the safety supervisors, towards fulfilment of the obligations established for the protection of health and safety in the workplace;
- Comply with the provisions and instructions imparted by the employer, by the managers and by the supervisors, for the purposes of collective and individual protection;
- use work equipment, dangerous substances and compounds, means of transport and protective equipment correctly;
- use the protection equipment provided appropriately;
- take care of the personal protection equipment provided, without modifying it of their own initiative and reporting any possible defects or problems to the employer, director or supervisor;
- report situations which could entail a risk for health and safety in the workplaces.

The integrity of human resources is a fundamental value for us: harassment and/or attitudes, both explicit and allusive, which may even slightly upset the sensitivity, infringe upon the dignity, respect and integrity, both physical and psychological, of human resources, are in no way and under no circumstances permitted or tolerated.

### **PROTECTION OF THE ENVIRONMENT**

FIMIC undertakes to promote actions that can ensure sustainable development and protection of the environment, undertaking to support innovative improvements in products and services which offer environmental and social benefits.

The Recipients of this Code of Ethics are required to develop an in-depth knowledge on the topics of sustainable global development and preservation of biodiversity and to take initiatives to protect the environment in everyday life, in the workplace and in society, must collaborate in the implementation of actions and projects promoted to protect the environment.

The Recipients are furthermore required to:

- contribute, to the extent of their competence, to fulfilment of the obligations put in place for protection of the environment;
- always evaluate the effects of their conduct in relation to the risk of damage to the environment;
- consistently with their own training and experience, as well as with the instructions and with the means provided or made available, avoid engaging in conduct that may cause damage to the environment;
- adopt measures targeted at preventing the production and at reducing the harmfulness of waste;
- ensure protection of the soil and of the subsoil, of the atmosphere and preservation of the territory as well as protection of surface water, marine water and groundwater;
- report situations that may pose a risk for the environment.

### **ETHICAL PRINCIPLES OF EMPLOYEES**

Employees are required to be guided by ethical criteria that allow a corporate life appropriate to the general principles of the company. In particular:

#### **Professionalism**

Each person carries out their work and duties with diligence, efficiency and fairness, using the tools and the time available to the best of their ability and assuming responsibilities linked to fulfilment. Professionalism also means maintaining an appropriate conduct, with a sober attitude consistent with the professional context, also from the point of view of the clothing worn during working hours in the company.

#### **Loyalty**

People are required to be loyal towards the company.

#### **Honesty**

In the context of their work, the people of the company are required to know and diligently respect Model 231 and the laws in force. Honesty constitutes the core principle for all corporate activities, for its initiatives and forms an essential value of the organizational management. Relationships with stakeholders, at all levels,

must be based upon criteria and conducts of fairness, collaboration, loyalty and mutual respect. Under no circumstances can pursuit of the corporate interest justify dishonest conduct.

### **Legality**

The organization undertakes to comply with all national and international rules, laws, directives and regulations and all generally recognized practices. Furthermore, it bases its decisions and its conducts upon care of the public interest entrusted to it.

### **Fairness and transparency**

People shall not use information, goods and equipment at their disposal during performance of the function or of the role assigned to them for personal purposes. People shall not accept, or make for themselves or for others, pressure, recommendations or reports that may be detrimental to the company or bring undue advantages for themselves, for the company or for third parties. People shall refuse and not promise undue offers of money or of other benefits. The company undertakes to operate in a clear and transparent manner, without favouring any interest group or single individual.

### **Confidentiality**

People shall ensure the highest confidentiality in relation to news and information forming corporate assets or pertaining to corporate activity, in compliance with the provisions of law, with the regulations in force and with Internet procedures. Furthermore, the people of the company are required not to use confidential information for purposes unrelated to the performance of their work.

Reference is also made to the paragraph “**PROCEDURE PERTAINING TO THE HANDLING OF CONFIDENTIAL INFORMATION**” within the INTERNAL REGULATIONS OF THE PERSONNEL of FIMIC.

### **Resolution of conflicts of interest**

People shall pursue, in the performance of their work, the objectives and the general interests of the company. They shall inform without delay their own superiors or contact persons of the situations or of the activities in which there might be an interest in conflict with that of the company, by the employees themselves or by their close relatives and in all other cases in which relevant reasons of convenience are present. People shall comply with the decisions that have been made by the company in this regard.

### **Sense of belonging**

People shall pursue, in performing their work, everything that does not hinder or compromise in any way the creation of a sense of belonging of people to their organization, work team or towards third parties.

### **Mutual respect**

People engaged in any capacity in collaboration with the company shall demand and actively show respect for the duties, competences, methods of performance of their duties, also through the omission of personal considerations to third parties.

## **SPECIFIC OBLIGATIONS OF THE EMPLOYEES**

The employees of the company must follow the indications provided in relation to the following topics:

### **Transparency**

It is good practice that all information pertaining to the activities carried out within the company is within the reach of everybody.

All collaborators are required to interact with their supervisor and colleagues in relation to the jobs they carry out.

In case of misunderstandings or problems, it is everyone's duty to interact first with their supervisor or contact person.

Behave in a scrupulously fair manner and independent from constraints of any nature that may influence their action both towards your Principal, and towards external Organizations in relation with them.

Do not engage in inappropriate economic relationships or accept valuable gifts or favours of any nature from Organizations, suppliers of your Principal.

Report, at the time of acceptance of the professional job offer or during its performance, any relationship or interest in common with external Organizations having relationships with your Principal, which are liable to determine conflicts of interest.

### **Consistency**

Having made a commitment, it must be fulfilled. Never leave a job unfinished and never take on commitments that you already know impossible to fulfil.

### **Courtesy and kindness**

Courtesy and kindness are and must be at the basis of each everyday activity; they must furthermore be a constant in interpersonal relations both inside and outside the company.

### **Punctuality**

If you are late for an appointment, it is good practice to notify this before the end of the time arranged; doing so later is impolite.

Punctuality is a form of respect towards those who are waiting for us.

### **Confidentiality**

All the information and the data managed in the workplace are the property of the company and confidential, and must be treated as such. In particular, you should never discuss work-related issues or situations in public places where you can be overheard, or in the presence of people who do not have the right to be involved in the information in question.

## **Professionalism**

Being professional means knowing all the appropriate conducts, all that is needed to carry out your work in the best possible manner, taking into account the needs of customers and of the company.

Whichever activity is carried out, it is always essential to be professional.

## **Working Environment**

Everyone should have the capacity to understand the phenomena which underlie interpersonal relations and adopt a conduct consistent with the context of reference, always seeking to maintain a courteous, cordial and collaborative atmosphere with your own colleagues.

## **Company loyalty and respect**

It is everyone's duty to share the company policies and strive so that these are respected.

During everyday activity, every collaborator should always protect the interests and the image of the company, besides having the highest respect for corporate property.

During the performance of your activity, you should always evaluate the economic implications of your choices, avoiding waste.

## **Respect for the customer**

The company, just as all companies in a free market, exists thanks to its customers.

Respect, kindness and courtesy should be a constant in the relations of those who establish contact with the organization.

## **Workstation**

Every collaborator is responsible for their own workplace. Everyone is in charge of the care and hygiene of the tools at their disposal.

## **Personal computers**

The personal computers supplied must be kept in the best condition possible and no other programs must be installed, except for those foreseen by the company configuration.

The hardware devices made available by the company are, to all intents and purposes, working tools and cannot be used for personal purposes.

In particular, the files contained in them are corporate assets and cannot be arbitrarily damaged and/or destroyed.

The use of hardware devices capable of copying and/or saving files and data, such as USB mass storage, laptops, optical discs, CD writers and any other electronic storage medium, without the prior express authorization of the company, is strictly prohibited.

Reference is also made to the paragraph "**COMPANY COMPUTER - EMAIL - INTERNET**" in the INTERNAL REGULATIONS OF THE PERSONNEL of FIMIC.



## **The Internet**

The Internet connection is a work tool and must be used as such.

The use of the Internet for private purposes is only allowed outside working hours.

Internet browsing:

- Is not permitted for sites that do not directly pertain to the performance of the duties assigned, especially those that can detect the employee's political or religious opinions or those regarding trade unions
- carrying out any type of financial transaction, including remote banking operations, on-line purchases and similar, save for cases directly authorized by the company and with respect of the normal purchase procedures, is not permitted
- downloading and installing free software (freeware), shareware, P2P and/or FTP, taken from internet websites, except with prior express authorization by the company, is not permitted
- all forms of registration on websites whose contents are not linked to the working activity are prohibited
- taking part, for non-professional reasons, in forums, or using chat lines is not permitted; storing IT documents of slanderous and/or discriminatory nature for gender, language, religion, race, ethnic origin, opinion and trade union and/or political membership etc. is not permitted

Reference is also made to the paragraph "**COMPANY COMPUTER - EMAIL - INTERNET**" in the INTERNAL REGULATIONS OF THE PERSONNEL of FIMIC.

## **Email**

Email is a company tool and is not to be considered private correspondence and therefore:

- any email message (since it pertains to working activity) can be copied and/or made public at any time
- use of email (internal and external) for reasons that do not pertain to the performance of the duties assigned is not permitted
- sending or saving messages (internal or external) of slanderous nature, discriminatory for gender, language, religion, race, ethnic origin, opinion and trade union and/or political membership etc. is not permitted
- setting up and using email accounts external to the company is not permitted

Reference is also made to the paragraph "**COMPANY COMPUTER - EMAIL - INTERNET**" in the INTERNAL REGULATIONS OF THE PERSONNEL of FIMIC.

## **Mobile phones**

Use of the mobile phone has some rules of good conduct which should always be complied with.

Given that it is a work tool, the mobile phone should always be kept muted during company meetings and meetings with the customers, especially when at their premises.

Use of the mobile phone for personal purposes must be limited to a minimum and only for cases of emergency.

Reference is also made to the paragraph “**USE OF THE COMPANY TELEPHONES, FAX AND PHOTOCOPIERS**” in the INTERNAL REGULATIONS OF THE PERSONNEL of FIMIC.

### **Company cars**

The company car is under the full responsibility of the person to whom it has been assigned: as for all the company goods, it should be used and maintained with the utmost attention.

It must be driven in full compliance with the requirements of the highway code.

For individually assigned cars, it is responsibility of the driver to whom the vehicle is assigned to clean it and ensure that it is always in conditions of best efficiency.

For cars assigned on a rotational basis (not individual) it is responsibility of the company to clean them and ensure that they are always in conditions of best efficiency.

Instead, with regard to ordinary maintenance, this is responsibility of the company. The company is also responsible for extraordinary maintenance, when reported by the driver to whom the vehicle is currently assigned.

Any fines resulting from infringements of the highway code are to be borne by the driver. Although the company does not encourage conducts that do not comply with the highway code, it understands that human error can take place, and for this reason shall share the payment of fines for an amount up to 100. The payment, for convenience, is managed by the company.

### **Private cars**

The use of private cars for work purposes is permitted; as in the case of the company car, the driver must act in full compliance with the requirements of the highway code.

Any fines resulting from infringements of the highway code are to be borne by the driver. Although the company does not encourage conducts that do not comply with the highway code, it understands that human error can take place, and for this reason shall share the payment of fines for an amount up to 100. The payment, for convenience, is managed by the company.

## **5. ETHICAL PRINCIPLES IN THE CONTEXT OF CORPORATE GOVERNANCE**

### **HANDLING OF CONFIDENTIAL INFORMATION AND PROTECTION OF PRIVACY**

Confidential information relating to corporate data, strategies, and objectives, must not be acquired and disclosed to outsiders to our company, except by those expressly appointed and delegated to this task.

All information pertaining to products, their development, production processes, commercial strategies and conditions, customers, partnerships, technological and industrial know-how, financial operations, operating results, investments, projects and technical documentation, marketing plans, lists of Suppliers and purchase prices, logistical aspects, IT solutions and everything else that is part of the knowledge assets for developing our business is also considered confidential information.

The confidential information and the materials used by Recipient Subjects in the context of their work are of exclusive property of FIMIC, which protects their confidentiality and asserts their origin.

The databases present at the company may contain personal data protected by the regulations protecting privacy, data which cannot be disclosed externally and, finally, data whose disclosure could cause damage to the Company itself.

The company operates in compliance with European regulations on the protection of personal data.

Each Recipient must:

- Acquire and handle only the data necessary and directly linked to its functions;
- Store said data in such a way as to prevent third-party outsiders from gaining knowledge thereof;
- Communicate and disclose the data in the context of the procedures predetermined by FIMIC or with the prior authorization of the person delegated for this purpose;
- determine the confidential and private nature of the information;
- make sure that there are no confidentiality constraints by virtue of relations of any nature with third parties;
- handle with absolute confidentiality, also after termination of the relationship with the company, data, news and information of which they are in possession, preventing their dissemination or use for their own or third-party speculative purposes.

The aforesaid rules on the correct handling of information are the subject of periodic information initiatives involving the personnel.

### **ACCOUNTING AND MANAGEMENT INFORMATION**

All activities and actions performed in the context of the work competences of each single Recipient Subject must be verifiable. Maximum accounting transparency must be sought, based upon fairness and reliability of the documentation and of the accounting entries made.

Every operation and the different levels of responsibility of those who acted in it, to attain the objectives that made it necessary, must be easily traceable.

FIMIC, in respect of the principles of accounting clarity and transparency, ensures that the respective financial statements and reports attached thereto are drafted according to fairness and truthfulness and in compliance with the laws in force on the subject of accounting records.

All subjects involved in drawing up the Financial Statements, including the administrative body, must act representing in a transparent and truthful manner the economic, capital and financial situation, providing the supervisory and control bodies with complete, correct and truthful information on the capital situation of the company of reference.

### **ANTI-MONEY LAUNDERING**

The Recipients collaborate so that commercial transactions take place in total transparency, fairness and good faith, for the purpose of combating the phenomena of fencing and money laundering.

In particular, the functions involved and competent ensure that:

- collections /payments in cash are not carried out;
- checks on the commercial and professional reliability of partners and suppliers by means of appropriate “due diligence” are carried out;
- assignments given to possible service companies and/or natural persons that take care of the economic/financial interests of the Company are drafted in writing, with indication of the contents and of the economic conditions agreed upon;
- Where joint ventures or other agreements aimed at joint investments are carried out, the highest transparency is ensured;
- the competent functions check that payments to all the counterparties have been made without irregularities and that the subject to whom the order is registered and the subject who collects the relative sums always coincide;
- the evaluation criteria of the offers are established.

### **INTELLECTUAL AND INDUSTRIAL PROPERTY**

FIMIC complies with the regulations on the subject of trademarks, patents and copyright. Therefore, products and/or semi-finished goods with trademarks or marks altered or counterfeit as well as manufacturing, marketing and distribution of products already patented by third parties and over which FIMIC does not have rights or that show distinguishing marks deceitful on the origin, on the source or quality of the product are not permitted for any reason. Protection of intellectual property rights is considered of primary importance and all unlawful distribution, reproduction, use, sale, with any purpose, for any use and with any tool is therefore prohibited.

Also in the context of the utilization of graphical materials (photographs, graphical representations, diagrams etc.) used for communication and marketing requirements, FIMIC carries out the necessary preliminary verifications for the purpose of avoiding violating the copyright of others.

FIMIC prevents the use of software not expressly authorized or that is unlicensed or of illegal origin.

## **TAX AND CUSTOMS FULFILMENTS**

All the company activities directed towards the management of tax and customs fulfilments must be carried out in compliance with the principles of legality, fairness, truthfulness and transparency.

The Company condemns any activity aimed at evading the payment of taxes on income or on added value, of other taxes in general or the payment of customs duties.

In particular, the implementation of objectively or subjectively simulated transactions is prohibited, as is availing oneself of false documents or other fraudulent means suitable to hinder investigation or to mislead the tax authorities.

The Recipients of this Code must prepare the tax/customs documents and ensure that the relative payments are made using the IT resources specifically provided by the Company and, if necessary, with the support of external Professionals, within their competence.