

	<b>ETHICAL CODE</b>	N°	CE02
		Rif. PO:	PO 0510-01
		Rev. 01	del 16/10/20

## 1. INTRODUCTION

With this Code of Ethics (hereinafter the "Code"), Elettronica Conduuttori S.r.l. (hereinafter the "Company") intends to formalize the set of recognized, accepted and shared values, as well as the commitments and responsibilities assumed towards the subjects with whom the Company enters into a relationship for the achievement of its corporate purpose.

By adopting and publishing this Code, the Company not only intends to comply with the provisions of Legislative Decree 231/2001 but to identify specific rules of conduct which, together with an effective company anti-corruption policy, define the principles and rules that govern their commercial activity.

In this context, the Code highlights the fundamental values, the reference standards and the rules of conduct, establishing the principles which must inspire the behavior of all the subjects who operate within the Company and / or in its name in relations with interested third parties.

In order to protect its image, respectability and safeguard its resources, the Company will not entertain relations of any kind with subjects who do not intend to operate in compliance with current legislation, who do not share the ethical principles and rules of conduct provided for in this Code.

This Code analyzes and explicit needs not of a merely legal and economic nature but of a precise social and moral commitment towards the entire community.

The verification of the application of the Code is the responsibility of the Board of Directors of the Company (since April I have been the sole director) who can promote proposals for integration and / or modification of the contents in order to ensure compliance with the regulations in force from time to time and to the different needs that may arise within which the Company operates. The Board verifies at least once a year the need to integrate and / or modify the Code.

The infringement of the provisions established by the Code is considered an infringement of the duties of fairness and good faith that must inspire the relations between the parties.

## 2. ADDRESSEES

The addressees of the Code are the Directors, shareholders, employees, suppliers, collaborators and all subjects who work in the name and on behalf of Elettronica Conduuttori S.r.l., both now and in the future.

It follows that the principles and provisions of the Code are binding for all recipients, constituting exemplary specifications of the more general obligations of diligence, correctness and loyalty that must inspire them in carrying out their activities.

The Company undertakes to promote effective knowledge of the Code in each warehouse and / or organizational unit, through a widespread dissemination of the Code to all recipients who are therefore required to know its contents, observe its principles and values as specified below.

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### **3. ETHICAL PRINCIPLES AND REFERENCE VALUES**

#### **- LAWS AND REGULATIONS :**

The Company operates in compliance with the laws and regulations in force in all the countries in which it carries out its business.

This commitment requires that the persons with whom the Company has relations - for whatever reason - also act towards it with rules and methods inspired by the same values.

In this context, particular attention is paid to compliance with the regulations governing all forms of discrimination, corruption, forced or child labor.

#### **- HONESTY**

Honesty has always been the fundamental principle on which the Company has based its business, from its origins to today. Therefore, relations with and between all recipients must be based on behavioral criteria of correctness, collaboration, loyalty and mutual respect.

The Company ensures that its directors, employees, collaborators and representatives do not violate the obligations and duties inherent in their office in order to receive promises of money or in any case advantages of various kinds.

#### **- CONFIDENTIALITY**

The recipients must guarantee the secrecy of any confidential or otherwise confidential information acquired by reason of their activity, in compliance with the laws and regulations in force, as well as internal procedures.

"Confidential information" must be understood as the knowledge of a project, a proposal, an initiative, an understanding, a commitment, an agreement, a fact or an event - even if future and uncertain - relating to the sphere of activity of the Company that does not is in the public domain and that if made public could cause damage to the same.

It is therefore forbidden to engage in any exploitation, use for economic purposes, direct investment or through third parties, of confidential information.

#### **- CONFLICT OF INTEREST**

In the context of the fiduciary relationship between the Company and the recipients, the use of working skills for the realization of the interests of the Company itself is a primary duty, in accordance with the principles set out in the Code.

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In this perspective, the recipients must avoid situations and / or activities that may see a personal interest opposed to one of the Company or that may in some way interfere with the ability to make decisions impartially and objectively.

**- WORKING ENVIRONMENT AND PRIVACY**

The Company undertakes to guarantee to all persons who interact with Elettronica Conduttori in any capacity, working conditions that respect personal dignity where the characteristics of the individuals cannot give rise to discrimination or conditioning.

In compliance with current legislation, the Company undertakes to protect privacy in relation to information from the private sphere and the opinions of both its employees and those who interact with it.

**- SAFETY AND WORKING CONDITIONS**

Respect for the physical integrity of the person represents the ethical reference value for the Company which protects and promotes the value of human resources in order to enhance, improve and increase the experience and the wealth of skills and potential of those who work together. with Elettronica Conduttori Srl Relationships and conduct in the Company must be based on principles of correctness, transparency, confidentiality, impartiality, diligence and loyalty, in mutual respect of the parties.

**- USE OF INFORMATION SYSTEMS**

The company uses the assigned IT resources solely for the performance of its business in compliance with the regulations on the use and management of IT systems and company procedures.

It is forbidden to use IT and network resources for purposes contrary to law, public order and morality or aimed at racial intolerance, violence, any form of discrimination or in order to commit or induce to commit crimes, damage or alter the information systems or information of private or public third parties or illegally obtain confidential information.

All employees are prohibited from installing unlicensed software on the Company's computers or using and / or copying copyrighted documents and material (audiovisual, electronic, paper and photographic recordings or reproductions) without the express authorization of the owner and without prejudice to the cases in which such activities fall within the performance of the assigned functions.

Finally, illegal downloads or transmissions to third parties of contents protected by copyright laws are prohibited.

(with regard to this point it is necessary to refer to the company regulation for the use of computer systems that I am attaching in the email and which I believe you have already recorded)

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- **TRANSPARENCY AND COMPLETENESS OF INFORMATION**

In carrying out its institutional activities, in the management of the financial resources used and in the consequent reporting and accounting registration, the Company is inspired by the principle of transparency and completeness of information.

Elettronica Conduttori believes that accounting transparency together with the keeping of accounting records with clarity and precision, in compliance with current legislation, are a fundamental prerequisite for efficient control.

Therefore, adequate supporting documentation must be kept for each operation in order to allow the reconstruction of the operation and the identification of any responsibilities.

**4. INTERNAL RELATIONS**

- **RELATIONS BETWEEN THE TOP MANAGEMENT OF THE COMPANY**

The activity of the corporate bodies is carried out in compliance with the rules established by the statute and by current legislation. In particular, the persons appointed to administrative functions are required:

- to use their specific skills to the maximum benefit of the Company, carrying out their duties with full fidelity and in complete transparency in order to allow the reconstruction of all the transactions carried out;
- to report without hesitation any situation of conflict of interest that sees them involved;
- the confidentiality of the information acquired in the performance of one's mandate.

- **RELATIONS BETWEEN EMPLOYEES**

Relations between employees are based on civil coexistence and must be carried out in compliance with the rights and freedoms of persons and the fundamental principles that recognize equal social dignity without discrimination for reasons of nationality, language, sex, race, religious belief, political affiliation and trade union, physical or mental conditions.

Although hierarchically organized, the employees of the Company must observe and apply the principles of honesty and equality in the context of mutual collaboration, in order to promote a work environment suitable for the protection of the person / worker both from a professional and relational point of view. In particular, each manager is required to exercise his powers with objectivity and balance, taking care of the professional growth of his collaborators and the improvement of working conditions.

Staff participate in training initiatives with commitment, professionalism and a collaborative spirit.

Employees are required to comply with all the provisions contained in the Collective Agreement concerning them and with all the trade union regulations relating to the behavior to be followed, promptly informing their

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direct managers about the onset of dynamics that may interfere with the correct management of the work activity.

**- RELATIONS BETWEEN TOP MANAGERS AND EMPLOYEES**

The top management of the Company must exercise their powers towards employees in a balanced way respecting the dignity of the person, refraining from oppressive and / or intimidating conduct aimed at violating the principles contained in the Code or laws.

On the other hand, employees are required to comply with the directives issued by the top management and their correct and diligent execution, with the exception of orders clearly contrary to the rules of the Code or to the laws in force which must be reported to the Supervisory Body (hereinafter also "OdV").

**5. EXTERNAL RELATIONS**

**- RELATIONS WITH EXTERNAL SUPPLIERS AND COLLABORATORS**

The Company, in compliance with the principle of correctness and transparency, ensures that, in addition to its employees and directors, also external collaborators, the representatives are not taxable persons or authors of private corruption.

The selection of suppliers and external collaborators and therefore the choice of purchases of goods and services must take place according to the principles of this Code and of the internal procedures envisaged.

The selection of suppliers must take place on the basis of objective parameters such as convenience, quality, capacity and efficiency and in any case according to what is indicated in the Quality Manual drawn up in compliance with the UNI EN ISO 9001: 2015 and IATF 16949: 2016 standards.

In relations with suppliers, free gifts, gifts, benefits of various kinds and nature, direct and indirect, which are aimed at obtaining preferential treatment are prohibited; the so-called gifts for use ?? - that is, those gifts that are usually exchanged on certain occasions and in particular at Christmas - if practiced by custom, they must comply with the requirement of a modest symbolic value and equal choice for all suppliers.

In the negotiations the representatives of the Company must not accept any promise of personal utility (money, services, future employment, various advantages) nor be influenced by such promises, having to pursue only the best advantage of Elettronica Conduttori. In this context, the Company prohibits corruption practices, illegitimate favors, collusive practices, direct solicitations and / or through third parties for personal and career advantages for oneself or for others.

In any case, any gift made on personal initiative or with one's own money or not previously intended for this purpose is forbidden, with the obligation in case of expenses with budgeted money for this purpose of precise reporting.

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**- RELATIONS WITH CUSTOMERS**

The Company wants to guarantee full customer satisfaction in order to create a solid relationship inspired by correctness, loyalty, efficiency and professionalism, maximum transparency, in compliance with current regulations. For this purpose, Elettronica Conduttori has adopted the ISO TS 16949: 2016, thus guaranteeing high quality standards of alignment of its organizational activity to the requests of customers.

In this context, the Company takes particular care that the Client:

- adequate information is given on what has been put in place in carrying out the activities carried out in its favor;
- results are not promised that do not relate to the responsibility of the Company itself;
- actions or behaviors contrary to the laws and principles of this Code are not recommended or proposed.

**- RELATIONS WITH AUTHORITY AND P.A.**

The undertaking of commitments with the Public Administration and with the Public Institutions, it is the responsibility of the corporate bodies expressly in charge of this. Relations in this context must be based on the strictest respect for the law, the Code and internal protocols.

It is forbidden for all subjects who operate in his interest, in his name or on his behalf, to accept, offer or promise, even indirectly, money, gifts, services, services or favors in relation to relations with public officials, of public service or private subjects, to influence decisions in view of more favorable treatments or for undue services or for any other purpose.

Any requests or offers of money or favors of any kind that exceed normal commercial or courtesy practices must be immediately reported to the O.C.

On the occasion of particular occasions, in particular the Christmas holidays, the Company may authorize small gifts to institutional interlocutors that have modest value and that respect the identity criterion for all recipients.

**6. RELATIONS WITH THE COMMUNITY AND THE ENVIRONMENT**

The Company is fully aware of the effects that its activity has on the reference territorial context, on economic and social development and on the general well-being of the community.

Therefore, the Company intends to operate in full compliance with local and national communities, with particular attention to the concept of sustainable development, managing its business and assets in an environmentally compatible manner in compliance with current regulations and also in consideration of the rights of future generations.

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## **7. RELATIONS WITH THE PRESS - MEANS OF COMMUNICATION**

The relationship with the information bodies is reserved only for the corporate functions in charge. Relationships that must be carried out in compliance with the principles of transparency and fairness. All other subjects must refrain from issuing any declaration / information relating to the Company's business or organization, unless specifically delegated.

## **8. RELATIONS WITH THE JUDICIAL AUTHORITY**

Electronics Conduuttori S.r.l. acts in compliance with the law and promotes, within the scope of its competences, the proper administration of justice.

The Company carries out its business in a lawful and correct manner, collaborating with the Judicial Authority, the Police and any Public Official who has inspection powers and carries out investigations against him. In this context, the Company expects the utmost availability and collaboration from all its employees and collaborators.

## **9. VIOLATION OF THE CODE OF ETHICS AND PENALTY SYSTEM**

The Company guarantees that, in the workplace, no person can suffer retaliation, illegitimate conditioning, discrimination or inconvenience of any kind for having reported the violation of the contents of the Code of Ethics or internal procedures.

The violations that may concern the predicate offenses referred to in Legislative Decree 231/2001 must be reported to the Supervisory Bodies of the Company in accordance with the procedures set out in the Organization and Management Model.

In any case, the reports must contain sufficiently precise information in order to carry out an appropriate analysis.

Violations will be prosecuted promptly, through adequate and proportionate disciplinary measures, regardless of any criminal relevance of the reported conduct and any subsequent criminal proceedings.

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## 10. METHOD OF DISSEMINATION OF THE CODE

The Company undertakes to promote effective knowledge by guaranteeing the knowledge of the Code.

All recipients will be informed of the existence of the Code through adequate correspondence, posting in places accessible to all, as well as through the inclusion of the Code in Elettronica Conduttori's corporate intranet and publication on its website.

In the case of new employment relationships, even occasional collaborations, new commercial contracts, agreements of various subjects (by way of example: conventions, appointment deeds, etc.) express reference and reference to the Code must be indicated.