

**PREMISE**

The provisions of the present Code of Conduct (CoC) are binding for directors, employees and third parties who have relationships, of any nature and title, with our Company.

**PROVISIONS****Relationships with work colleagues**

Every employee / collaborator must make every effort to maintain a decent working environment and respect the dignity of each individual with whom he comes to interact. In particular, it is forbidden to adopt intimidating, oppressive and offensive behavior towards colleagues or collaborators in order to marginalize or discredit them.

Any violation will be subject to the application of sanctions or disciplinary measures commensurate with the seriousness of the violation; every employee is required to promptly report any violations.

**Staff in positions of responsibility**

Anyone who has the role of manager must demonstrate with his / her behavior that compliance with the provisions of the present CoC is fundamental in the work activity.

Each manager is obliged to report any case of non-compliance with this CoC, as well as to ensure the protection of those who have made reports on the matter.

**Harassment**

Our company considers unacceptable, as well as deplorable, any type of harassment and / or behavior that has the purpose and effect of violating the dignity of the person, both inside and outside the workplace.

**Non-discrimination**

Our company is committed to offering its employees equal opportunities in work and professional advancement.

Furthermore, any form of discrimination based on age, sex, health status, nationality, sexual orientation, political opinions and religious beliefs of employees must be avoided.

In this regard, each manager must ensure that, for all aspects that affect the employment relationship, the employees are always treated in a manner consistent with the ability to meet the requirements of the service assigned to them.

The above also for the aspects affecting recruitment, training, remuneration, promotions, transfers and terminations.

**Relations with Customers and Public Administration**

The undertaking of commitments to Customers, Public Administration Bodies and Institutions in general is reserved exclusively for authorized company functions, in compliance with the strictest observance of the applicable Law provisions.

Our company, through its employees, collaborators or representatives, must not promise or offer to customers, public officials or employees of public institutions, money, assets or other utilities of various kinds in order to promote and foster business interests or other interests of personal type. Acts of commercial courtesy, such as gifts or forms of hospitality, or any other form of benefit, even in the form of donations, are allowed only if they are of modest value and do not compromise the integrity and reputation of the parties and can not be interpreted, by a third and impartial observer,

as acts intended to obtain advantages and favors in an improper way. In any case, every courtesy must always be authorized and adequately documented.

#### Relations with Suppliers

It is forbidden for the supplying personnel to receive any form of consideration from anyone for carrying out an act of their office or contrary to the duties of the office.

In particular, it is forbidden to accept gifts or other forms of benefit that are not attributable to normal courtesy relations based on what is indicated in the previous point.

Furthermore, they must not undergo any conditioning, by unauthorized company personnel or third parties, in order to take decisions or carry out actions relating to their work.

#### Relations with trade unions or political parties

Any relationship of our Companies with trade unions, political parties and their representatives or candidates must be guided by the highest principles of transparency and fairness.

Any financial contributions by the Company are allowed only if provided for by law and in any case subject to authorization by the Management.

Any financial contributions by the employees, as well as the activities provided by them, are to be intended exclusively on a personal and voluntary basis.

#### Respect for safety and the environment

Every employee must comply with the company's environmental regulations, in particular those relating to waste, storage of materials, spills and emissions.

Every employee must comply with company regulations regarding health and safety at work, in particular on the use of protective devices and compliance with operating procedures; furthermore, it must not place other employees in the face of unnecessary risks that may cause damage to health or physical safety.

Every employee is required to promptly report any anomalies / non-compliance with the provisions.

#### Use of company assets

Employees are required to use the assets they have available in an efficient manner and in ways that protect their value.

Any improper and / or unauthorized use can be prosecuted according to the law and, in the most serious cases, can generate consequences for the purposes of the conservation of the workplace.

#### Confidentiality of data and information

All information pertinent to the Company must not be disclosed to third parties except for specific authorization or only through the channels set up for this purpose; they include in particular:

- commercial and administrative information;
- Information relating to personal data;
- technical information on projects, production processes, criteria and application procedures.

The foregoing also for the loss, falsification and improper handling of information, including unauthorized access.

**MANAGEMENT AND APPLICATION ASPECTS****APPROVAL AND DISCLOSURE**

This CoC is approved by the company management and is subject to revision. It is brought to the attention of all recipients and interested parties through direct distribution, posting on the bulletin board in the workplace, sending via e-mail to the outside.

**CONTACT**

In order to promote the dissemination and full application of this CoC, a Contact Person has been identified in the figure of Ms Anna Rossetti. The Referent commits himself to the Employer to:

- guarantee the application of this CoC by all categories of employees;
- provide the necessary clarifications and support for the application
- manage the reports received in the strictest confidence;
- report any violations to the Management.

**REPORTING OF ILLECIT / NON-COMPLIANCE**

All Recipients may report to the Referrer unlawful conduct and / or violations of the present CdC of which they have come to know due to the functions performed, in writing anonymously or not, through:

- e-mail to: [comunicazioni.wb@finelvosrl.191.it](mailto:comunicazioni.wb@finelvosrl.191.it)
- or by registered mail to the following address: to the c.a. Anna Rossetti, at FINELVO srl - via Opificio Negri 2- 13898 Occhieppo Superiore (BI) –

Such reports must be sufficiently detailed and based on precise and concordant facts.

The Contact Person will evaluate the contents to adopt the most appropriate provision, ensuring the confidentiality of the authors of the reports, in accordance with the provisions of law No. 179 of 30/11/2017 (provisions for the protection of perpetrators of reports of crimes or irregularities). In particular, it is specified:

- the prohibition of acts of retaliation or discriminatory, direct or indirect, against the reporting agent for reasons connected directly or indirectly to the report made;
- the application of sanctions and disciplinary measures against those who violate the protection measures of the reporting party, as well as those who carry out with malice or gross negligence reports that prove to be unfounded.

**INFORMATION**

All Addressees may contact the Contact Person for any clarification regarding the interpretation or application of this CoC.

All requests for clarification will be promptly answered and in particular every contribution will be positively evaluated.

Occhieppo Sup.re, 28/05/2020

La Direzione

*Roberto ROSSETTI, Anna ROSSETTI*

**FINELVO SRL**

Administratore  
Dott.ssa Anna Rossetti

