



SCANFERLA BRUNO s.r.l.

Tecnologie e produzioni per l'industria
Technologies and Production for the Industry

CODE OF CONDUCT

by
SCANFERLA BRUNO Srl
Rev. 01

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Following the ratification in 1997 of the Organisation for Economic Co-operation and Development (OECD) Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, criminal law on corruption has been tightened in many countries, in some cases even exceeding the requirements of the OECD Anti-Corruption Convention. According to the new Criminal Law Convention against Corruption of the Council of Europe, member states must also punish active and passive private bribery and oblige companies to assume their responsibilities with regard to active public and private bribery.

Definitions

Corruption is the abuse of power aimed to obtain an improper personal advantage or an unfair advantage at the expense of a third party or the public. Corruption is not limited to the abuse of a public position but may also occur between private companies.

From a legal point of view, the official definition of bribery has a paramount importance: an individual guilty of "bribery" is anyone who deliberately promises or grants a pecuniary (cash) or other advantage or an object of value to a third party to commit an act (or omission) contrary to his official duties, in order to obtain or retain offers of unfair advantage.

Being subject to corruption (so-called passive corruption) is also considered as an act of corruption. Bribery of foreign public officials is now punishable by law worldwide.

"Facilitation payments" are generally understood as payments made to public officials to secure certain actions or expedite actions that are in themselves legal and normally provided for in the role of that person. According to the above-mentioned Criminal Law Convention on Corruption of the Council of Europe, member states must also prosecute facilitation payments, except for those that are not considered important.

Compliance with laws and ethical standards, fair competition

All employees must comply with applicable international and local laws. The same laws must be followed by suppliers, agents, distributors and other business partners. This can be underlined, for example, by inserting relevant clauses in contracts with such partners.

SCANFERLA BRUNO Srl does not tolerate unfair or unethical business relationships.

Obligations of workers:

1. Every worker shall take care of his or her own health and safety and that of other persons in the workplace, on whom the effects of his or her actions or omissions fall, in accordance with his or her training, instructions and means provided by the employer.

2. Workers shall in particular:

a) contribute, together with the employer, managers and supervisors, to the fulfillment of the obligations provided for the protection of health and safety in the workplace and in relation to the dangers arising from Covid19, all undertake to comply with the legislative decrees on prevention that the company has on the company notice board.

b) comply with the provisions and instructions given by the employer, managers and supervisors for the purpose of collective and individual protection;

c) properly use work equipment, hazardous substances and mixtures, means of transport and, as well as safety devices;

d) properly use the protective equipment made available to them; and

e) immediately report to the employer, the manager or the person in charge the deficiencies of the means and devices referred to in subparagraphs **c)** and **d)**, as well as any possible dangerous condition of which they become aware, taking direct action, in case of urgency, within their skills and possibilities and without prejudice to the obligation referred to in subparagraph **f)** to eliminate or reduce the situations of serious and imminent danger, notifying the workers' safety representative

f) not to remove or modify safety or warning or control devices without authorization;

g) not to carry out on their own initiative operations or maneuvers that are not their responsibility or that may compromise their own safety or that of other workers;



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- h) participate in training and education programs organized by the employer;
- i) undergo health checks provided for in this Legislative Decree or otherwise ordered by the competent physician.

Behaviour not allowed

The following behaviour shall be prohibited

- Promises, offers or payments of bribes or other benefits to domestic or foreign public officials or employees of private companies and acceptance of such payments or benefits.
- Promises, offers or facilitation payments or gratuities for facilitating business relationships.

Gifts and invitations

Gifts

The exchange of gifts is not part of the company's business practices. In general, it is not permitted to give or accept gifts in the form of money or valuables.

However, in some countries, the exchange of gifts may be allowed by local customs or courtesy. The value of gifts must be such that they do not subject the recipient to any form of dependency or violate any applicable laws.

Invitations

Invitations are similarly regulated and must be within appropriate limits, so that their acceptance does not subject the recipient to any form of dependency.

In this case, commercial relations are also regulated in a specific way.

Invitations may be made or accepted in the following cases:

- Lunches/dinners with representatives of companies with which the company has business relations, with expenses proportionate to the occasion.
- Special occasions for the company that extends the invitation, such as corporate occasions at the headquarters, visits, events with customers.
- Corporate hospitality events organised by the company, of a proportionate size.

The employee's supervisor must approve any exceptions to this policy in advance by written notification to the Divisional Chief Operating Officer.

Legal consequences

The law in force determines the penalty for inadmissible conduct listed in the section "inadmissible conduct". It should be remembered that an employee who bribes a foreign public official commits a crime not only under the law of the country of that public official, but also under the law of his country of origin. The employer of an employee involved in active bribery will also be held liable.

Failure to comply with this company directive will result in disciplinary action by the employer.

Implementation, responsibility

Operational managers are responsible for ensuring that all employees, as well as their partners, are aware of the content of this directive and act accordingly.

Managers are required to respect the principles described in this directive and to encourage appropriate behaviour by employees through clear instructions.

Employees must behave appropriately in line with this directive. If in doubt, they must consult their supervisor. This directive cannot cover

or define all situations that may arise for managers and employees.

In the event of doubt, you should contact your Divisional Operations Manager immediately.

Recruitment and equal opportunities

Purpose. This policy establishes and communicates the principles governing equal employment opportunities for the company **SCANFERLA BRUNO Srl**



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Politics

In its recruitment and promotion policies, Scanferla Srl undertakes to provide equal opportunities to all qualified candidates. The company is committed to build a workforce that reflects the structure of the population of the community in which it works.

In all its operations and hiring practices, it will comply with the applicable law on equal employment opportunities in order to ensure that there is no illegal discrimination against employees or candidates.

This is to provide employees with a work environment free of discrimination, harassment, intimidation or coercion directly or indirectly related to race, colour, religion, disability, gender, sexual orientation, age or origin.

Management, managers and other employees will actively support this corporate policy. All actions and decisions shall be aimed at pursuing this corporate policy.

Procedure

If an employee believes that he has been subject to discrimination, he should present the matter to his direct supervisor, the department head, the department operating manager, as he sees fit. If an employee witnesses a case of discrimination, he should report it to one of the above persons, regardless of the position of the person found guilty of the discrimination (e.g., management, supervisor, colleague, etc.). If a manager or supervisor receives a complaint of discrimination, he should immediately report the complaint to management.

This policy does not in any way require that the employee reporting the discrimination, to report the matter to the person affected by the complaint. All complaints of discrimination will be investigated promptly. The privacy of the persons concerned will be protected, except for the measures necessary to conduct appropriate investigations. If the investigation confirms the complaint, immediate corrective action will be taken to stop the discrimination and prevent its reappearance.

An employee who believes that he has been subject to discrimination or witnessed discrimination and who reports the matter in accordance with this policy will not be subject to retaliation or adverse treatment.

Discrimination

Purpose. This policy establishes and communicates the principles of the company SCANFERLA BRUNO Srl against discrimination.

Policy

Scanferla Srl believes that all employees should be treated with dignity and respect.

The creation of a working environment free of discrimination is part of the company's policy; it prohibits any form of discrimination against its employees by managers and other employees.

All employees and managers must work together to achieve this goal. Discrimination is considered a serious act of misconduct and employees who commit it will be subject to disciplinary action, including immediate dismissal. For the purposes of this policy, the term "discrimination" includes discrimination based on sex, race, ethnicity and other forms of discrimination, including discrimination based on disability.

Forms of discrimination depending on the facts and circumstances include for example:

- **Verbal or written discrimination**

For example, unpleasant or offensive comments regarding race, colour, gender, sexual orientation, religion, race, ethnic origin, mental or physical disability, age, appearance or other legally protected categorization; threats of physical harm; distribution, including by e-mail or other electronic means, or display in company work areas, of written or graphic material with such effects.

- **Physical discrimination**

For example, beating, pushing or other types of aggressive physical contact, or threatening such actions, or inappropriate gestures.

- **Sexual harassment**

For example, unpleasant sexual, verbal and physical conduct, including advances, requests for sexual favours or other verbal or physical conduct of a



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sexual nature, with or without the purpose of encouraging an intimate relationship.

• **Racial discrimination**

For example, unpleasant or offensive comments about race, colour, race or ethnic origin; distribution, including by e-mail or other electronic means, or display in company work areas, of written or graphic material with such effects.

The application of productivity standards and work practices in a fair and regular manner by supervisors is not considered discrimination. Employees who violate this anti-discrimination policy will be subject to disciplinary action at the discretion of the Company, including suspension and termination of employment. Supervisors and managers who fail to report violations of which they are aware will also be subject to disciplinary action, including suspension and termination of employment.

Procedure

If an employee believes that he is being discriminated against, he should consider the option of communicating his objection to the person found guilty of such conduct. This is often sufficient to resolve the problem. If an employee does not wish to address the offending party (or if the unwelcome conduct of the offending party does not stop), the employee should report the offending conduct to his direct supervisor. If he prefers to discuss the matter with someone other than his immediate supervisor, or if the immediate supervisor does not take the actions that are necessary to resolve the issue, he should contact the Departmental Operations Manager.

All complaints will be investigated promptly and discreetly. Employees will not suffer any consequences as a result of reports of discrimination, including sexual harassment.

Antitrust law

Purpose. This policy defines the principles based on which SCANFERLA BRUNO Srl ensures compliance with antitrust law.

Policy

The company complies with all applicable antitrust laws. We believe in a system of free competition. We believe that compliance with all applicable laws is in the interest of our customers.

Only in this way will we gain their trust.

Antitrust laws vary from country to country. Our minimum standards are as follows:

- We apply an open and independent competition policy in each market. We do not enter into agreements (formal or otherwise) with competitors to fix prices or allocate products, markets, territories or customers illegally.
- We do not share with competitors any information about prices, profit margins, costs, offers, market shares, distribution practices and terms and conditions of sale.
- We understand and comply with all applicable pricing laws throughout the supply chain.
- We do not unfairly favour certain customers over others.
- We do not participate in meetings of so-called trade associations, except in the case of legitimate and professional trade associations for commercial, technical or professional purposes.

Complaints of non-compliance

Purpose. This policy is a fundamental part of the Code of Conduct of SCANFERLA BRUNO Srl and aims to facilitate compliance with the Code itself.

Policy



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However, the standards set out in this Code represent the core of the principles of SCANFERLA BRUNO Srl. Each employee is responsible for compliance with these principles.

All employees are required to report any violations of the law or this Code or requests for action that may constitute a violation. Such cases may be reported to the supervisor, the supervisor's manager, the departmental operations manager.

Confidentiality will be ensured to the maximum extent possible, but as in all investigations, it cannot be 100% guaranteed.

Retaliation or victimization of employees who report an incident in good faith will not be tolerated and will be subject to disciplinary action. The same applies to abuses in these reporting processes.

If you have any questions about a specific situation, please contact the Management. It is important to resolve any issues promptly before they cause serious harm to the company.

Environmental Standards

Environmental Protection

In line with the principle of prevention, the Scanferla company is committed to minimizing risks to people and the environment, protecting the natural resources that are the basis of production, and containing waste in the company (water, light, space heating/cooling). F

Advancing an ISO 14001-compliant environmental management system (EMS) and take all necessary measures in order to achieve its objectives appropriately.

Climate Action

Scanferla engages in persistent and active climate action, for example by increasing energy efficiency or procuring energy from renewable sources.

Water consumption and quality

The Scanferla company is continuously committed to using water with due care, minimizing its withdrawal but continuing to ensure access to drinking water and sanitation for all personnel.

Air and soil quality

Scanferla is committed to complying with legal regulations and local authority requirements.

Materials and waste disposal

Scanferla Company is committed to minimizing the impact its activities may have on the environment by using resources sparingly, paying attention whenever possible to recycling and reusing materials and waste. We are committed to complying at all times with legal provisions and the requirements of the authorities.

I hereby confirm that I have received and understood the CODE OF CONDUCT

Surname _____



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Name _____

company _____

Task _____

Place/Data _____

Signature _____