



QUALITY POLICY AND CODE OF ETHICS

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00	01/01/2002	Quality Policy	Tedeschi E.	Tedeschi E.	Tedeschi E.

To all stakeholders

Sinterleghe's business is based on transparency and our determination to adopt the appropriate conduct. Our customers rely on the accuracy of our information, the reliability of our systems and the integrity with which we operate.

Trust is our currency.

This Quality Policy and Code of Ethics expresses our commitment to improve our sustainability and to produce value in an ethical manner for the organisation, the community and all stakeholders in the company's business. It also defines the expectations we must have of ourselves and others and offers useful information to guide our decision-making process.

Our actions are based on sound principles and consistent behaviour. The trust we generate and our success depends on this.

Thank you for your continued contribution.

Sincerely yours,
Eugenio Tedeschi
CEO & Brand Ambassador

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1 QUALITY POLICY

PURPOSE: The quality policy defines the direction to go in (where we go) and how to go there (the behaviours), allowing, in the context of Sinterleghe, to distinguish desired from undesired ways of operating

The quality policy is based on:

- *Values* from which the *Code of Ethics* is derived
- *Vision* from which the *Mission* is derived.



SINTERLEGHE UNDERTAKES TO:

Disseminate: provide maximum dissemination of this document by bringing it to the attention of company personnel and any third party who may be acting on behalf of the company.

Every member of the company, at each revision:

- is given a copy as an integral part of the employment contract in order to examine, learn and respect its contents;
- is required to adopt the behaviours of the code of ethics;
- signs for acceptance thus recording distribution, understanding of the document;
- The code is displayed on every company notice board and is disseminated and made public through publication on the company website.

Inform: which references are mentioned in it, i.e. employment contracts, codes of conduct, policies, manuals, operating procedures, rules and sanctions in case of violation.



2 VISION AND MISSION

2.1 VISION: Satisfy Your Needs Inspire Our Quality.

We grow by staying focused on listening and understanding real needs. They continuously stimulate and inspire us to grow as individuals, as an organisation, capable of developing quality solutions and systems.

2.2 MISSION:

Mastering the know-how to produce and evolve applications in the field of electrode dressing and automatic electrode change by integrating them with the full potential of Industry 4.0 with the unequivocal goal of creating value for all our current and future stakeholders.

3 VALUES

Values inspire Sinterleghe's culture, permeate its way of working and are the guiding principle of the code of ethics (henceforth Code).

3.1 Safety: the safety and health of people is the company priority.

3.2 Respect for people and their potential: we welcome human resources without distinction of gender, age, ethnicity, nationality, religion, psycho-physical and socio-economic conditions, ensuring a working environment inspired by principles of equality and protection of the freedom, dignity and inviolability of the person. People are regarded as individuals capable of growing and developing their abilities: the highest form of respect is to stimulate their potential.

3.3 Continuous improvement: with the logic of a Lean Enterprise, we foster the creation of work teams of people with different skills to develop multidisciplinary expertise with the unequivocal goal of producing characteristics, functionality and economic sustainability to be delivered to our current and future stakeholders. Respect for people's potential is implemented through continuous improvement and the exercise of problem solving.

3.4 Transparency, fairness, honesty, integrity, teamwork.

3.5 Communication: communication, in all its forms, is the main tool for interacting with others, transparency represents its truthfulness, and methods and tools guarantee its quality.



4.1 HEALTH AND SAFETY

The safety of people's health is a company priority, Sinterleghe operates within the following regulations and principles:

- a) Health protection: we protect health and safety by complying with all the contents of Legislative Decree 81/2008
- b) Employment contracts: our employment contracts comply with all the contents of the National Collective Labour Agreement for Employees of Metalworking Companies (Industry) of 26/11/2016 and subsequent renewal agreements.
- c) Guidelines on chemical, physical and biological agents: We comply with European Commission Directive 92/85 of the Council of 05 October 2005 on guidelines for the assessment of chemical, physical and biological agents and industrial processes considered hazardous to the safety or health of pregnant workers and workers who have recently given birth or are breastfeeding.
- d) Company risks: we assess all company risks by drawing up a Risk Assessment Document in accordance with Art. 28 paragraph 2 Legislative Decree 81/2008, as amended and supplemented by Leg. Decree 106/2009.
- e) Improvement of safety standards: pursuant to Art. 35 of Legislative Decree 81/2008 we carry out a periodic risk prevention and protection meeting to improve every area of health and safety in the working environment.
- f) Safety training: we train our employees and third parties on safety regulations, personal protective equipment (PPE), emergencies and accident and incident management, and any other safety and health-related content. We promote the principle 'prevention is better than damage control' by investing in machines/equipment supported by enabling technologies of Industry 4.0 so as to prevent injuries caused between operators and moving parts.
- g) Health Surveillance: our Prevention and Protection System complies with the legal obligations of Legislative Decree 81/08 Art. 41.1
- h) Interference risks: we eliminate and minimise interference risks by complying with Art. 26, paragraph 3, Legislative Decree 81/08, verifying the suitability of companies contracting work within our production site and drawing up the Unified Document for the Evaluation of Risks of Interference (DUVRI)
- i) Health protection: we develop the production layout with company resources, sharing the needs in a logic of safeguarding health, efficiency and well-being in the workplace.



4.2 RESPECT FOR PEOPLE

4.2.1 HUMAN RIGHTS AND WORKING CONDITIONS

- a) Human rights and working conditions: For employees, Sinterleghe adopts in accordance all the contents and regulations of the National Collective Labour Agreement for Employees of Metalworking Companies (Industry) of 26/11/2016 and subsequent renewal agreements.
- b) Protection of moral and physical integrity: all company personnel, whose physical and moral integrity is considered a primary company value, are guaranteed working conditions that respect individual dignity, in safe and healthy working environments. In particular, the company does not tolerate:
 - abuse of power: to request, as an act due to the hierarchical superior, personal services and favours, or to adopt attitudes and/or perform actions that are detrimental to human dignity and especially to the autonomy of the employee constitutes abuse of the position of authority;
 - acts of psychological violence: attitudes or behaviour that are discriminatory or harmful to the person and his or her beliefs;
 - sexual harassment: behaviour or speech that may offend the personal sensibilities of the operator;
 - acts of bullying: which may also seriously endanger the health of the employee at the work site;
 - operational mobbing: which can lead to psychological situations with serious consequences in the employee's operational activity.
- c) Conduct guidelines: the conduct guidelines for employees are based on the National Collective Bargaining Agreement for the metalworking sector C.C.N.L., and in addition: discipline and execution of work, working hours, holidays, leave, absence due to illness and injury, use of company equipment, travel, disciplinary code of conduct, rules of conduct for confidential information, treatment of know-how are defined in the Disciplinary Code Rev.01 of 01/07/2020 et seq. The information contained therein is accepted and signed by each employee upon employment and/or shared at each review.



4.2.2 RESPECT FOR THE ENVIRONMENT

- a) Environmental Policy: Sinterleghe operates in respect of and in compliance with national (Legislative Decree 152/06) and regional regulations on environmental protection.
- b) Atmospheric emissions: the activities of the Anzola d'Ossola production plant do not generate significant atmospheric emissions or water discharges requiring environmental authorisations or periodic checks by local control bodies.
- c) Types of waste and risks to the environment: The responsible management of all types of waste and environmental risks is contained and described in the Risk Assessment Document, DVR_rev.6 dated 05/02/23 et seq. All types of waste from Sinterleghe's production activities are handled in compliance with the relevant Italian legislation, and their disposal is entrusted exclusively to suppliers registered with the National Register of Environmental Managers and ISO 14001 certified.
- d) Renewable energy: 100% of our energy comes from European renewable sources, in accordance with Resolution ARG/elt104/11 and certified by Guarantee of Origin (so-called GO referred to in Directive 2009/28/EC)
- e) Emission reduction CO2 kg: we certify how many kg of CO2 Sinterleghe has saved the environment by recording and publishing the data on our energy suppliers' invoices.
- f) Circular economy: we transform waste from the processing of our aluminium components into by-products for resale in accordance with Legislative Decree 152 Art. 184 bis and Art. 5 of Directive 2008/98/EC Decree No. 264 of 13/10/2016 encouraging the circular economy model 'less materials, less waste, less emissions'.
- g) Sustainable design: We design and manufacture our products with a commitment to the correct and responsible use of resources, using production processes and making products that are more energy efficient than traditional processes and end products, to make products that are longer lasting and better functioning, efficient in terms of maintenance, and that will need to be replaced less frequently, we favour the use of materials that can be recycled at the end of the equipment's life.
- h) Environmental impact, energy efficiency: in order to improve the local environmental impact and with the aim of overcoming local and national legislation in this area, our Headquarters was built in X-LAM material, reducing the energy demand for heating, cooling and lighting at source, guaranteeing all stakeholders a visually, acoustically and climatically comfortable working environment and an earthquake-proof structure.
- i) Protection of the working environment and company assets: it is the company's responsibility to provide a healthy, safe environment that complies with current legislation. It is the direct responsibility of all company resources to protect the company's assets and property by complying with the rule of art in the use, care and maintenance of buildings, machines, software, equipment, by using the tools entrusted to them in a correct and responsible manner and by avoiding improper use. In order to guarantee the health of all, minimise the risk of accidents and protect the environment, every employee must immediately report safety and/or compliance shortcomings of any company property.



4.3 CONTINUOUS IMPROVEMENT

Sinterleghe is a Learning Company in that continuous learning is both the result of Problem Solving and the basis of quality work.

- a) Problem Solving: Learning requires method.
 - Problem solving uses the PDCA method, in its various forms (8D - DMAIC...)
 - No problem is solved if it is not first well defined and the fault tree analysis and checks made before the implementation of actions cannot be demonstrated.
 - Each leader is responsible for applying it and training people in their area from the application of the 5 Whys technique.

- a) Working in quality: it is learning today in order to achieve the optimal, stable result at the next attempt with the least waste of resources and physical and mental energy.

- b) Right to learn: we promote everyone's right to learn by fostering the ability to work as a team and in a transparent manner. Learning is not limited to attending a course, but comes from performing a test in a limited area, experimenting and evaluating results in the field. Learning is not knowing a theory, but testing it in the field in a way that is integrated with the know-how of one's colleagues. Everyone has the right to perform a test, clarifying its purpose, scope, expected benefits, assessing its risks and interfacing with his or her line manager first. Kaizen is the main tool for learning not the only one: it is executed in Team, in a transparent way, it is a formal event, both in the implementation of the improvement and in its evaluation.

- c) Training and multidisciplinary competence development: we carry out continuous training and multidisciplinary competence development in the weekly Design Review meeting and Kaizen events. They are examples of essential but not unique moments for comparing different skills, aimed at producing an improvement and an increase in them.
 With the logic of a Lean Enterprise, we reinforce corporate values, create teams of people with different skills, where high performance is multiplied in a culture of honesty, authenticity and healthy conflict.

- d) Self-improvement: Self-improvement mapping is represented by the skill matrix, a dynamic and shared document that provides new targets, develops training paths for new skills enabling the achievement of individual and team goals.

- e) Enhancement of expertise: we enhance our expertise and the quality of our products/processes with the accuracy, professionalism and comprehensiveness of our presentations. We may have the best products, the highest quality, the most precise design, the most useful software, but if we present them inaccurately they will be perceived as such.



4.4 ETHICAL PRINCIPLES AND STANDARDS OF CONDUCT

Corporate culture and rules of conduct: transparency, fairness, honesty, teamwork.

- a) Transparency: we find it irresponsible to agree on one activity and act otherwise, inconclusive to justify one's own ineffectiveness by criticising the inefficiency of others.
 - Transparency is respect for people.
 - Lack of transparency undermines trust.
 - Transparency is embodied in teamwork, participation in business processes, methodical communication, the use of visual tools, and consistency with commitments.
- b) Fairness: we believe that ethics regarding behaviour is the ability to measure and confront oneself while respecting the opinions of others, freely expressing one's own ideas and supporting agreed decisions even if they differ from one's own ideas. Correct behaviour allows the interlocutor to express himself, it is based on exposition and listening and judging on the basis of data. Imposing an action without being able to give a simple explanation if requested or with a strongly imposing attitude is not considered correct behaviour, as it can compromise teamwork.
- c) Honesty: we do not tolerate any behaviour aimed at obtaining unlawful benefits in the conduct of business by employees, partners, directors of Sinterleghe or any company stakeholder.
- d) Integrity: everyone's daily conduct must be modelled on the values and code of ethics set out herein. Integrity to these values and requirements is the basis of the person's performance evaluation. How we achieve results matters more than the results we achieve. It is how we achieve results that ensures we achieve them again and again.
- e) Teamwork: we value teamwork because we believe that working in transparency, fairness, honesty, trust and respect within a multidisciplinary group means that there is a competition of experience and knowledge which, if managed through effective methods and processes, can greatly enrich the hard and soft skills of each member and achieve results that could not be achieved individually.
- f) Respect for others: we promote respect for others, the environment and the rules of the local and international community. Respect for others includes stimulating people's potential, growth and development by engaging them in activities that go beyond what is considered normal and usual.



4.5 COMMUNICATION

a) Communication: communication in all its forms is the main tool for interacting with others; transparency represents its truthfulness, and the methods and tools guarantee its quality.

For this reason:

- We implement visual systems in front of which teams confront each other and make day-to-day operational decisions;
- We implement a routine calendar with stated purpose meetings in which we share the most complex data and information in standard formats that all participants can understand;
- We do not consider e-mail as the main communication tool, but prefer as far as possible for e-mail to be a summary and formalisation tool. This is because the e-mail tool does not guarantee direct and fast feedback as direct communication makes possible;
- We require that the communication use standard tools for requesting and transmitting data.



4.6 RESPONSIBILITY - PROTECTION - CONFIDENTIALITY - CONFLICTS

- a) Financial responsibility: we are committed to implementing every practice and transaction in a legally correct and transparent manner, carrying out checks and documenting everything, in order to achieve the corporate purpose; thus, we guarantee the protection of the corporate assets and participation rights of shareholders, employees, directors and/or customer and supplier representatives. Any violation or attempt will be sanctioned and prosecuted in accordance with the applicable regulations. To reinforce the concept of transparency on financial responsibility, Sinterleghe, despite being of a size and with a turnover such that Italian law does not provide for the appointment of an independent auditor, as of 2019, has appointed an independent auditor who monitors the company's administration, supervises compliance with the law and the articles of association, and ascertains that the company's accounts are properly kept, that the financial statements correspond to the books and records, and that national and international standards and laws are complied with.
- b) Protection of Sinterleghe's and third parties' intellectual property: company information of any kind (commercial, financial, technical) is an asset that the company intends to protect, as it is a heritage of know-how and technical investment. Disclosure to unauthorised persons is prohibited. The rules of conduct, procedures for classifying information and its treatment for the protection of intellectual property and confidential information of Sinterleghe and third parties are contained in the "Company Policy" Rev.01 of 08/01/2019. On 24/01/2019, all resources were trained on the content by the Jacobacci firm's lawyers. They are shared, accepted and signed by each employee upon recruitment.
- c) Employee Confidentiality Commitment: the obligation of confidentiality on company information and the rules of confidentiality agreements with employees are collected in the Annex-D "Sinterleghe Employee Confidentiality Commitment" Rev.01 of 08/01/2019 are shared, accepted and signed by each employee upon hiring.
- d) Supplier confidentiality agreements: the rules of Sinterleghe's unilateral and/or bilateral confidentiality agreements signed with suppliers protecting their reciprocal rights are collected in the Annex-A "Supplier confidentiality agreement" Rev.01 of 08/01/2019
- e) Customer Confidentiality Agreements: the rules of Sinterleghe's unilateral and/or bilateral confidentiality agreements signed with customers protecting their mutual rights are collected in the Annex-B Bis "Bilateral Customer Confidentiality Agreement" Rev.01 of 08/01/2019

- f) Agency, distribution, cooperation and licensing contracts: all our partners sign specific contracts on the distribution of our products, Agency contract 10/10/17 and s.s., Distribution contract 01/01/10 and s.s., Cooperation & license Agreement 01/01/2018 and s.s. in which the economic, technical, after-sales service, guarantee of our product and territories are defined. The utmost importance is attached to the protection of confidential information and to Sinterleghe's know-how, which always remains entirely the property of Sinterleghe. Our partners undertake not to modify and/or alter our products and undertake to protect our know-how by all means and to inform us immediately of infringements by third parties. Any breach by our partners that creates any kind of damage to the end customer using Sinterleghe's products and/or to Sinterleghe implies immediate termination of the contract and compensation for damages where due. All contractual clauses are drafted and applied according to Italian law, jurisdiction is exclusively assigned to the Court of Turin (Italy). Any breach of contract by our partners that is detected by any company resource must be immediately reported to the CEO of Sinterleghe, who will carry out the process of verification and all necessary actions to protect the company's assets.
- g) Protection of information security and data protection: the company aims to fulfil the contractual requirements undertaken with its customers on information security and in compliance with the most up-to-date European and national regulations on privacy, for this purpose it has adopted information security management, the Organisational Model and the General Data Protection Regulation (GDPR). All personnel are subject to the policies/procedures contained therein and declare by signing this code of ethics that they fully accept all its provisions/requirements. With regard to the use of IT tools, each employee is required not to impair the functionality and protection of the equipment entrusted to him/her. In short, the following is not allowed:
- using the tools available (software, e-mail, internet, telephone, etc.) for purposes that are not work-related;
 - downloading programmes or installing unauthorised software, or software other than that provided by the company;
 - sending e-mail messages that are insulting or that may cause offence to a person and/or damage the corporate image;
 - browsing websites with indecorous and offensive content;
 - using company equipment for personal activities outside work.
- h) Conflict of interest: the conflict of interest may be of a real (actual), potential or, finally, apparent (or perceived) nature; it is the situation where a secondary interest (financial or non-financial) of a person tends to interfere with the primary interest of the company (i.e. the common good), towards which the former has precise duties and responsibilities.
- In the performance of their work, each employee is required to avoid any possible conflict of interest, financial or non-financial, that could influence the independence of their judgement and conflict with their responsibilities. In particular, the employee must disclose the existence of a stable or temporary employment relationship, or a financial or non-financial relationship with external and/or internal entities that could interfere with the impartiality and transparency of his or her conduct and jeopardise the fairness of the activities he or she carries out, and could seriously damage the reputation of the person involved and that of the organisation in which he or she works, as it could lead to the impression that the entire organisation is lenient with respect to such practices.

Why it matters: a conflict of interest can arise whenever our personal interests as individuals interfere, or appear to interfere, with the interests of the company. Furthermore, conflicts of interest may arise if we perform actions or have interests that make it difficult to carry out the

work objectively. These conflicts may call into question our judgement and our products and services. If the trust that has been developed over time with our stakeholders is lost, it can be difficult to rebuild. By knowing how to recognise and present or avoid potential conflicts of interest, we protect our reputation and our ability to perform work transparently.

How we can do it: every employee must immediately report any situation that constitutes or may give rise to an actual or apparent financial or non-financial conflict of interest to the company's HR manager. This means that:

- everyone has to take responsibility for recognising situations that could compromise our judgement, really or even just in appearance
- in every transaction we prioritise the interests of the company over our own personal interests or advantages.

Connections with third parties

A conflict of interest may arise if you, or a person with whom you have a close connection, receive inappropriate personal benefits (e.g. cash, gifts, forms of entertainment, services, discounts, loans or guarantees, information related to know-how as defined in Company Policy Rev.01 of 08/01/2019. Each of us must avoid putting ourselves in situations where the interests of those with whom we have a personal relationship may influence our decisions in an improper way.

This means that we avoid:

- participating in the recruitment, evaluation or promotion of those with whom we have a personal relationship or to influence their compensation, benefits or opportunities if they work in the company
 - taking advantage of opportunities that have been created or come to our knowledge by using the company's assets, information or other resources or the position we hold
 - not reporting the existence of a personal relationship between supervisor and subordinate or vice versa
 - not informing of the existence of a connection/interest with a third party involved in the business of customer/supplier/competitor/partner
- accept outside employment positions that interfere with our judgement or ability to perform our job duties at Sinterleghe to the best of our ability.

This means that while we work for Sinterleghe each of us:

- ensures that employment or engagement with another company does not affect the work performed at Sinterleghe
- does not accept any work that causes improper disclosure of confidential and proprietary information of the company as defined in Company Policy Rev.01 of 08/01/2019
- does not compete with Sinterleghe nor work with the competition
- does not use company time or resources to perform work related to board membership, a position of civic responsibility, a second job or a personal activity.



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4.7 RESPONSIBILITY

- a) **Accountability:** the company has a responsibility to ensure that its expectations of conduct towards its recipients are understood and put into practice by them. It also undertakes to implement training courses aimed at all levels of the organisation and initiatives to raise awareness of the contents in order to prevent the occurrence of behaviour that can be sanctioned. Compliance with the rules of this Code must be considered an essential part of the contractual obligations of employees and all recipients to whom it applies. In particular, it must also be considered an essential part of the contractual obligations undertaken by governance bodies, collaborators, including subordinate collaborators and/or persons having business relations with the company.
- b) **Enforcement:** in order to ensure the effective enforcement of the code, the company requires anyone who becomes aware of any instances of non-compliance with this code to report it. Employees and collaborators must report any violations or suspected violations to the direct supervisor, the Personnel Manager and/or the CEO in charge of the company. The Supervisory Board, which is activated by the CEO, is represented by the Personnel Manager and the direct supervisor of the person under investigation. The Supervisory Board ascertains the merits of the report, verifies the information transmitted with due attention both for the possible application of disciplinary sanctions and for the activation of contract termination mechanisms. The Supervisory Board also ensures that no-one in the workplace, may suffer retaliation, unlawful conditioning, discomfort or discrimination, for having reported a violation of the contents of the Code or internal procedures. Any form of retaliation against persons who have in good faith reported possible violations of the Code is also a violation of the Code. Furthermore, the behaviour of anyone who accuses other employees of a violation, knowing that such a violation does not exist, shall be considered a violation of the Code.
- c) **Non-compliance:** the violation of the principles laid down in the Code and in company procedures undermines the relationship of trust between the company and whoever commits the violation (to collaborators, consultants, company staff, customers, suppliers). Violations, once ascertained, will be prosecuted, promptly and immediately, through the adoption, in accordance with the provisions of the applicable legal framework, of appropriate and proportionate disciplinary measures, regardless of the possible criminal relevance of such conduct and the institution of criminal proceedings in cases where they constitute a criminal offence. In the event of violations by collaborators, suppliers, penalties will be applied and in the most serious cases termination of the relationship, under the terms of the contracts. In the event of violations by employees, disciplinary measures for violations of this Code shall be taken by the company in line with applicable laws and relevant national labour contracts. Such measures may also include the removal from the company of those responsible for such misconduct. The company, in order to protect its image and safeguard its resources, will not entertain relations of any kind with persons who do not intend to operate in strict compliance with the regulations in force, and/or who refuse to behave in accordance with the values and principles set out in the Code. The company wants to institute precise disciplinary measures so that no abnormal situations are created at work that create discrepancies in uniform behaviour and procedures.



5 SUMMARY

a) It is compatible with shared values

By way of example but not limited to:

- Occasional compliments that are acceptable and appropriate that are characterised by respect, consensus and transparency.
- Interacting without distinctions based on age, ethnicity, social status, political opinion, religious belief, gender, sexual orientation, disability and any other condition that may generate inequality.
- Agreeing on an activity and acting in support of the agreed decisions even if different from one's own ideas.
- Encouraging teamwork to enhance and increase one's own skills and those of each member.
- Reporting any breach of the code to the supervisory body: direct supervisor, HR manager and/or CEO
- Ensure that the code is effectively applied and that violation of the principles set out in the code and company procedures undermines the relationship of trust between the company and whoever commits the violation.

b) It results in the violation of shared values:

By way of example but not limited to:

- Explicit or implicit requests for sexual services, sexual attentions that are unwelcome or considered offensive by the subject.
- Dealing with distinctions based on age, ethnicity, social status, political opinion, religious belief, gender, sexual orientation, disability and any other condition that may generate inequality.
- Agreeing on an activity and acting differently.
- Obstructing teamwork and criticising the skills of others to justify the ineffectiveness of one's own work.
- Accusing other stakeholders of a violation, knowing that such a violation does not exist.
- Creating the conditions under which people may suffer retaliation, wrongdoing or dubious conditioning, inconvenience and discrimination, including for having reported violations of the contents of the Code or internal procedures.



When in doubt, ask yourself...

- am I observing the values of integrity, honesty and respect for people?
- is what I am doing in line with the Quality Policy and the Code?
- is it legal and am I authorised to do so?



Ask your superior and/or the human resources department for advice.

Anzola d' Ossola: 26/10/2023

SINTERLEGHE S.R.L.
L'Amministratore Unico
Eugenio Tedeschi

