



Code of Ethics





Introduction

- The Rodacciai Group (hereafter just RA) wishes to emphasise, both internally and to its external collaborators, the importance of behaving correctly and transparently.
- The model to be pursued by each individual RA operator is that of the honest citizen, respectful of laws and regulations, behaving, in principle, with all due diligence.
- All of RA's activities must be performed in strict compliance with laws and with honesty and integrity, in respect of the interests of customers, employees, shareholders, commercial and financial partners, and the community in which RA is present with its activities.
- All those who work at RA are committed to achieving these objectives as part of their roles and responsibilities.
- It is important to define clearly and precisely the set of values recognised, accepted and shared by the whole Group, along with the set of responsibilities that the group itself assumes internally and externally, for all situations in which RA operates.
- For these reasons RA has prepared a code of conduct which must be respected by employees and collaborators for the proper functioning of RA itself, along with its integrity and reputation, which constitute decisive assets for its business success.
- The code indicates the responsibilities and lines of conduct in different contexts in which issues of ethical nature may manifest.
- Each employee/collaborator is required to know and respect the code and to contribute to its implementation.
- RA undertakes to encourage and facilitate constructive dialogue on the commitments, responsibilities and rules of conduct contained in the code.
- RA also undertakes to disseminate the content of this Code in the most appropriate methods.
- In the face of what is expressed above and specified below, Management, also by way of the Personnel Department, may therefore apply sanctions to those behaving in a manner that clearly contrasts with the rules.
- Management, also by way of the Personnel Department, will supervise behaviours so as to avoid illegality and incorrect conduct.
- The Managers of departments, areas, sections and offices, as illustrated in the organisation chart, ensure that their conduct complies with the principles provided in this Code and demand the respect of the latter by employees and collaborators. To that end, Managers are seen as role models. For the purposes of this code, each manager is responsible for the collaborators under their management, coordination or control, and supervises them to prevent violations of the code itself. Any anomaly will be reported to Management / the Personnel Department so that the appropriate measures may be taken.



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Rules of Conduct

Being part of RA, at the different levels of responsibility, means respecting its business rules and accepting its values of professionalism, fairness and honesty.

Accordingly, this code indicates a series of guiding principles of individual and collective behaviours to be followed by everyone at RA.





General Principles

- RA's employees/collaborators must respect the laws and regulations in force, ensuring that their actions and behaviours comply with the principles, objectives and commitments cited in the code.
- All actions, operations and transactions completed or implemented by RA must be based upon the utmost correctness in terms of the management and transparency of information, legitimacy from the formal and substantial aspect and clarity and truthfulness in accounting records, in accordance with existing rules and according to established procedures, and they must be able to be verified.
- All company activities must be performed with professional commitment and ethical rigour. Each employee must provide a contribution adequate to their responsibilities and must act in a manner that protects RA's image.
- Relationships between employees/collaborators, at all levels, are based upon criteria of correctness, integrity and mutual respect.
- Each employee/collaborator is responsible for storing and protecting RA's assets and resources entrusted to them for the conduct of their activity.
- No employee may use RA's assets and resources improperly or allow others to do so.
- It is the primary responsibility of executives, managers and officers to apply concretely the values and principles contained in the code, to fulfil their responsibilities, internally and externally, and to strengthen loyalty, cohesion, respect and team spirit
- Executives, managers and officers are, primarily, required to implement projects and actions useful for increasing the managerial and technological values of the company and the long-term well-being of employees and the community.
- Each employee/collaborator recognises and respects personal dignity and the private sphere and rights of each individual.
- Each employee/collaborator works with women and men of different nationalities, cultures, religions or races, as well as with 'differently able' personnel: discrimination, harassment or sexual, personal or other offences are not tolerated



Personnel Policies

- Employee dedication and professionalism are crucial values and conditions for achieving the business objectives. For this reason, RA undertakes to develop the skills and knowledge of each employee through training and education activities, also following a policy of merit and equal opportunities.
- The selection and recruitment of personnel is conducted taking into account the correspondence of individual and professional qualities with the provisions
- Management, employees and collaborators contribute, in synergy, to achieving positive shared results and they undertake to create a serene, stimulating and gratifying working environment.
- Employees/collaborators must not perform side activities that are in contrast with the specific obligations assumed by them towards RA.
- The company assets and, in particular, the IT and network resources, must not be used for purposes contrary to mandatory rules of law. The provisions of existing regulations are also noted and reiterated.



Conflicts of Interest

- RA has a relationship of trust with each employee/collaborator.
- Employees/collaborators must avoid situations and activities in which a conflict of interest with the Company may arise or which may interfere with their capacity to make impartial decisions in the company's best interests.
- Any situation that may constitute or determine a conflict of interest must be promptly communicated to the manager.
- By way of example and without limitation, the following situations may constitute a conflict of interest:
 - a. assumption of corporate roles or conduct of working activities of any type at customers or suppliers;
 - b. assumption of economic and financial interests by the employees/collaborator or by his/her family in activities of suppliers or customers.
- However, situations may occur, which, despite constituting a hypothetical conflict of interest, are, for various reasons, authorised by Management



External Relationships

- Within their roles, employees/collaborators must not offer or grant to third parties, or accept or receive from third parties, directly or indirectly, donations, benefits or other unauthorised utilities, with the exception of donations of small value directly ascribable to normal relationships of courtesy or in any case unlikely to engender in the other party or in an extraneous and impartial third party the impression of illegality or immorality.
- Its customers constitute an integral part of RA's corporate wealth.
- RA holds relationships with customers and suppliers which respect the fundamental principles and, taking account of their legal, social, economic and cultural system, the rules of this Code.
- Employees/collaborators are required to perform their activities in relation to customers with skill, precision, dedication and efficiency, honesty, integrity, openness, respect and transparency.
- With regard to suppliers, RA pursues a fair and impartial selection policy.
- In this perspective, the provisions already specified in the above paragraphs are reiterated, particularly those relating to conflicts of interest and those concerning donations, benefits or other utilities.
- Relationships with the media bodies are held by Management also by way of the Personnel Department or possibly by specifically authorised and delegated managers.



Business Policies

- The regulations in force in Italy, along with those inserted in our legal system by international sources, are respected with regard to: promotion and support of human rights, prohibition on forced labour, prohibition on child labour, respect of working times, prohibition on discrimination, and freedom of association.
- Environmental protection and safeguarding natural resources are objectives pursued closely by RA.
- All employees/collaborators, in performing their roles and activities, must contribute to pursuing optimal results in that sector.
- RA contributes to environmental protection and safeguarding of resources also through specific training/information provided to its collaborators/employees.
- The health and safety of its employees/collaborators is one of RA's priorities. RA's good management policy involves respecting the specific regulations in force and systematically and constantly training its employees/collaborators as well as adjusting its infrastructures and machinery.
- All RA's employees/collaborators, at the different levels of the company organisation, are required to pay the maximum attention to the conduct of their activities and, if they are figures in charge, de facto managers or managers, to control, monitor and manage any anomalous situations that occur, or are about to occur, in the field of safety.



Confidential Information

- The information, knowledge and data acquired or developed by employees/collaborators during their work or through specific activities belongs to RA and must not be used, communicated or disclosed without specific authorisation from Management.
- The notion of confidential information includes all data, deeds, documents, reports, studies, drawings, photographs and any other material relating to the Organisation and to the company assets, production methods, commercial and financial operations, research and development activities as well as judicial and administrative proceedings relating to RA.
- The personal data and data of third parties which, for the conduct of its activities, RA must process, fall within respect of existing regulations on Privacy.



Key

Management: in RA's organisation, the leading body in terms of strategy, guidance and authority.

Executive: senior figure positioned, according to principles of management functionality, in key positions within the company organisation.

Manager: top level employee often equipped with high managerial responsibilities.

Officer: term ascribable to an 'intermediate' resource or 'employee' with modest responsibilities of guidance/coordination of a working team.

Employee: labourer, clerk, manager, executive bound by a synallagmatic relationship of subordinate nature.

Collaborator: person who, in various contractual guises, holds close relationships of continuous and fiduciary activity with the Company.

De Facto Manager: person who must prepare the necessary safety measures, as well as monitor and oversee their concrete implementation.

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