



# CODE OF ETHICS

## SECTION 1:

### BASIC PRINCIPLES

#### Introduction

The ILTOM Group mainly specializes in sheet metal working, in particular in light metal frames for different applications. Its registered office, administrative and operational headquarters are located in Romanengo (CR), In Italy; the Group consists of different production sites based in different European Countries, namely in Italy, France, Romania and Bulgaria.

In the present Code of Ethics, the Iltom Group sets the basic ethical values it takes inspiration from as well as the rules of conduct it wishes to follow in carrying out its business activity.

All employees of the Iltom Group and all people contributing to the achievement of the company's aims within the context of their contractual relationship with the company are required to comply with these principles.

All recipients shall comply with this Code of Ethics and report any violations of the Code to the Management, as soon as they become aware of that through the e-mail address **sicurezza@iltom.it**

This code of ethics is made available to all Employees of the Iltom Group and is available on the Group website. All employees of the Iltom Group shall be acquainted with the content of the code of ethics and adhere to it.

#### 1) Rule of law and principle of compliance

The compliance with all statutory and regulatory provisions in force in all the Countries the Group operates in requires a constant commitment and duty of all people working for the Iltom Group and underpins the entire corporate behaviour.

#### 2) Integrity and fight against corruption

Uprightness, honesty, loyalty and good faith in internal and external relationships. Unacceptance of unlawful behaviours, or anyway of incorrect behaviour, and commitment to fight against any form of corruption in order to achieve personal or business objectives.

#### 3) Equality, fight against discrimination, respect for the dignity of the human person and freedom of association

Equal dignity and equality of treatment of all subjects involved in the Group activities. No form of discrimination is accepted, in both internal and external relationships, based on political opinion, trade union membership, religion, race, ethnic origin, age, sex life or sexual orientation, health or any other personal characteristics.

Moreover, the Iltom Group condemns any activity, which implies the exploitation of any individuals and in particular, recognises the importance of the protection of minors and the repression of any form of child labour.



## CODE OF ETHICS

The workers of the Iltom Group are free to associate and have the right to collective bargaining.

### **4) Adding value to people and ensuring equal opportunities**

The principle of equal opportunities underpins the professional growth and the management of employees and collaborators. The recognition of results obtained, of professional potential and of the skills demonstrated are basic criteria for a career advancement and a pay increase.

### **5) Protection of health and safety at work**

Compliance with all regulations concerning health and safety at work and a work environment without any risks for the safety and health and where operational risks are kept within acceptable levels.

### **6) Environmental protection**

The Iltom Group supports a preventive approach to environmental challenges; supports and takes initiatives that promote environmental responsibility and encourage the development of environmentally friendly technologies within all its production units.

Compliance with all regulations in force concerning environmental protection and pollution; implementation of programmes for the separate collection of waste; use of alternative energy sources; reduction of any form of pollution (environmental, noise or any other form of pollution) and encouragement to develop and expand the use of eco-friendly technologies.

### **7) Transparency and professionalism**

Commitment to carry out tasks and responsibilities assigned in a diligent manner, acting with a sense of responsibility while developing and protecting the corporate assets.

### **8) Confidentiality**

Protection of privacy and confidentiality of information people have become aware of in connection with their duties and tasks.

## SECTION 2: RULES OF CONDUCT

The aim of the rules of conduct is to define how to behave at work, in order to comply with the basic ethical principles aforementioned. They concern both work ethic and business ethic.

### 1) Relationship with clients

The Iltom Group focuses its activities on Customer satisfaction and protection in view of providing customers with high Quality products and services meeting their reasonable expectations while protecting their safety and integrity.

Moreover, when communicating with the customers, employees are required to provide accurate, true and exhaustive information on the products and services supplied by the Iltom Group to allow them to make conscious decisions.

The Iltom Group and their employees' behaviour towards their customers must be characterised by availability, courtesy and respect, in view of a loyal and highly professional relationship.

### 2) Relationship with suppliers

Suppliers, external collaborators, products and services shall be selected in compliance with corporate procedures. Moreover, the supplier's performance shall be available and supported by objective and written information.

In any case, the selection shall be carried out in compliance with the principles of transparency, traceability, free competition, non-discrimination and equal treatment according to objective

principles connected with competitiveness and the quality of products and services offered.

While striving for the maximum competitive advantage for the Group, the latter shall always make sure, in any possible way, that its suppliers always adopt operating solutions in line with regulations in force and, generally, with the principles of protection of human beings, workers and of health, safety and environment.

Therefore, suppliers shall comply with the principles set forth in this code of ethics and the Code of conduct for suppliers; the Group employees are required to timely report any supplier's behaviour, against the principles set out in this Code of Ethics, to their superior.

### 3) Relationship with competitors

The Iltom Group has relationships with companies operating in its business sector in accordance with the rules of fairness and fair competition.

### 4) Financial transparency

The Iltom Group acknowledges the importance of transparency, accuracy and completeness of financial information and strives to have a reliable administration and accounting system allowing to correctly present management activities and to provide the necessary tools to identify, prevent and manage financial and operating risks, as far as possible.

This is why all operations or transitions shall be correctly recorded in the company accounting system in compliance with the law and with the applicable accounting principles, as well as be authorised, verifiable, lawful, coherent and consistent. To make sure the accounting system contains truthful, complete and transparent information, all operations shall be supported by

## CODE OF ETHICS

adequate and exhaustive documents which shall be recorded and retained by the Group.

### 5) Hiring and professional development

People are a basic element to the company existence. The employees' devotion and professionalism are key values and conditions for the Group to reach its objectives.

New people are hired to both fill positions requiring skills and professionalism not present in the company and integrate young people on which to invest to ensure the growth and development of the Iltom Group.

All employees are engaged under a contract of employment in compliance with the applicable laws; the Iltom Group will not tolerate any form of irregular or undeclared work.

In order to make the most of the employees' skills and competencies and to allow everybody to express their potential, the competent business functions shall manage and develop human resources in such a way as to guarantee all workers equal conditions, equal opportunities of improvement and professional growth.

### 6) Harassment at work

Iltom Group forbids any form of harassment in both internal and external working relationships. Harassment shall mean:

- the creation of a threatening and hostile work environment, or one having the effect of isolating an individual or a group of employees;
- unwarranted interference with other people's work or actions that can be a hindrance to other people's perspectives.

Any form of violence or sexual harassment or making fun of personal or cultural diversities is forbidden.

### 7) Alcohol, drug abuse and smoking ban

Employees of the Iltom Group shall refrain from working while under the influence of alcohol or drugs. It is forbidden to:

- Have, use, offer or sell, for any reasons, drugs or equivalent substances during work hours and at work;
- Smoke at work, outside the designated smoking areas.

### 8) Privacy protection

The Group's activities require the acquisition, retention and treatment of non-proprietary data, documents and information that shall be protected. Therefore, due to their position, employees are required to protect the confidentiality of information acquired.

The Iltom Group, for its part, undertakes to protect the information and to avoid any improper use, in compliance with data protection regulations.