

PUGLIA**INOX**
divisione arredamenti



ETHICAL CODE



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CHAPTER 1

INTRODUCTION

Article 1 - Purpose and contents of the Code of Ethics

This Code of Ethics collects the ethical principles and behavioral rules which, together with the legal, regulatory and contractual ones, govern the organization and activity of the company of Il Lattoniere S.r.l. (hereinafter also the "Company"), which must be respected by all those who act in his name and on his behalf and who are in any way related to the same.

Il Lattoniere S.r.l. recognizes as its primary objective that of acting in every context with the utmost correctness and ethics, both in the conduct of its activities, and in relations with third parties, for any reason and in any form involved in the business activity.

This primary aspiration intends to be inspired by values such as legality, respect, loyalty and fairness in the development of entrepreneurial activity, which also provides for the pursuit of economic and business development objectives, without prejudice to the importance of attention and empathy with others, calmness and serenity in everyday behavior.

This Code of Ethics is also intended to represent the founding basis not only of the Company's behavior and conduct models but also of the Company's organizational, quality and control models and to be an appropriate tool for the prevention, identification and supervision of any inappropriate behavior, unlawful and criminally relevant. A good personal, company and collective reputation is an essential intangible resource and must never be lost sight of; it constitutes a fundamental basis for healthy business activity. Externally, it favors investments, customer loyalty, the attraction of the best human resources, the serenity of suppliers, reliability towards creditors. Inside, it allows you to make and implement decisions without friction and to organize your work without bureaucratic checks and exercise of authority.

The Code of Ethics therefore represents an instrument of "corporate ethics" and, as such, governs the general principles and rules of conduct which are recognized as having a positive ethical value, with the aim of guiding the company's actions towards ethically correct behavior.

This Code of Ethics forms an integral part of the organization, management and control model provided for by art. 6 Legislative Decree 231/01; consequently, all the activities of the Company must be consistent with the principles expressed here.

This Code of Ethics has been drawn up on the basis of the indications and principles provided by the Confindustria Guidelines - last update July 2014.

Article 2 - Recipients and dissemination of the Code

The principles and provisions of the Code of Ethics are binding for the conduct of the Administrative Body, Members, employees, consultants and anyone who enters into contractual relations for any reason, directly or indirectly, permanently or temporarily, in Italy or abroad, with the Company.

The recipients of the rules of the Code have the obligation to comply with the requirements contained in this document and to conform their behavior and actions to the principles expressed below.

The Company undertakes to make use of the provisions contained in this Code in all economic relations established by it, as well as to give it the greatest possible dissemination.

For the aforementioned reasons, the Code is made available to any interlocutor of the Company and a copy of the same is delivered to all those who work for and within the Company.

For the same reason, this Code of Ethics is published on the Company's website.

Finally, the Company recommends and requests the main suppliers and partners to comply with the principles and

requirements contained in this document.

Article 3 - Effectiveness of the Code

The conduct set out in this Code describes and crystallizes, from an ethical point of view, the fulfillment of the obligations of loyalty and diligence which must be followed by all members of the corporate bodies, employees, collaborators, suppliers and commercial partners who, for any reason, come into contact with the Company.

It follows that failure to comply with the conduct to which the Company explicitly attributes ethical value will be sanctioned in proportion to the incorrect conduct put in place, with recourse to the extremes in civil, criminal and disciplinary terms.

Compliance with the rules and provisions contained in the Code constitutes an integral and essential part of the contractual obligations deriving from subordinate employment relationships, for employees, and contractual regulations, for non-subordinate collaborators.

The violation of the aforementioned rules will constitute a breach of the obligations deriving from the employment or collaboration relationship, with any consequence of law or contract.

The deeds of assignment include the express provision of the application of this Code and a clause for termination or forfeiture of the relationship in case of violation of the obligations deriving from the same.

Article 4 - Implementation and updates of the Code

The Code of Ethics is adopted by the Company and can also be modified and integrated on the basis of indications and proposals made by the Supervisory Body provided for by Legislative Decree 231/01 and disciplined in the Organizational Model.

Article 5 - Duties of the Code

The employee, in carrying out daily activities, fulfills his duties by ensuring compliance with the law and pursuing exclusively the interests of the Company without abusing the position or powers of which he is the owner.

The employee also respects the principles of integrity, fairness, good faith and transparency.

The Company protects its employees and collaborators by guaranteeing working conditions that respect the dignity of the person.

The Company condemns any behavior that could upset the sensitivity and dignity of the person and incorporates the text of the "Regulations for the protection of the dignity of women and men within the Company", approved in consultation with the trade unions, into this Code. on October 24, 1997.

The Company does not tolerate discrimination related to age, sex, race, health, nationality, political opinions and religious beliefs and undertakes to protect workers from acts of psychological violence, contrasting any attitude or behavior discriminatory or harmful to the person, his beliefs and preferences.

CHAPTER 2

GENERAL ETHICAL PRINCIPLES

The general ethical principles must be brought to the attention of all the recipients of the provisions of the Code.

Article 6 - Transparency and traceability

The principle of transparency is based on the authenticity, clarity and accessibility of information.

The Company undertakes to observe this principle by providing all interested parties with the necessary information in a clear and unequivocal way and by adopting a communication, verbal or written, which is easy and immediate to understand.

In entering into contracts, the Company discloses its information and communicates in a clear and understandable way, always ensuring the maintenance of equal conditions and the traceability of the information.

Article 7 - Correctness

The principle of correctness provides, as a fundamental condition, the respect by all those who work in the Company, or in any case for the same, of the rights of each person involved, beyond the mere observance of the Law and / or the Employment Contract .

Compliance with this principle is to be considered unconditional also in terms of privacy, in this regard, the Company will refrain from any situation that could give rise to any kind of discrimination between those who work for the Company or in any case for the same.

Article 8 - Efficiency

The principle of efficiency provides that all work activities are carried out with professionalism and functionality, according to the most advanced standards of each sector.

In carrying out its work, the Company undertakes to offer a service suitable to the customer's needs, always respecting the management of the company resources used.

Article 9 - Spirit of service

The principle of the spirit of service aims to provide a service characterized by efficiency, quality and high social value under fairer economic and regulatory conditions, without any arbitrary discrimination.

The Company directs its research and development activities to high quality standards.

Article 10 - Professional enhancement and collaboration between colleagues

The Company protects human resources and promotes their professional growth, also by respecting principles and rules on equal opportunities; the same also recognizes the centrality of human resources, encouraging collaboration between all those who work in the company or in any case for the same.

Article 11 - Integrity

The Company refuses in any way behaviors that can favor or facilitate the performance of practices of any culture or religion that are in contrast with the public order rules recognized by the State and that affect the physical integrity of people for purposes not connected to the treatment or, however, considered unlawful by current laws.

Requests or threats aimed at inducing people to act against the Law and against this Code or to adopt behaviors detrimental to the moral and personal beliefs and preferences of each are not tolerated.

Article 12 - Competition

The Company undertakes to promote fair competition on the market, operating according to principles of fairness, loyalty and transparency towards all competing operators and, in any case, avoiding the risk of anti-competitive or fraudulent conduct towards competitors, refraining from collusive conduct and abuse of position.

Article 13 - Antitrust and unfair competition

The Company, by virtue of the activity carried out, recognizes the primary importance of the value of free and fair competition between the subjects operating on the market and, therefore, stigmatizes any behavior that could constitute an impediment or disturbance to the running of a business.

The Company complies with antitrust and competition laws, promoting total and fair competition in all sectors in which it operates and undertaking not to use violence or threats in order to upset or prevent the exercise of a competing activity, not to use fraudulent means designed to condition the free market and not to engage in any deceptive or disparaging conduct.

Article 14 - Prevention of corruption

The employee respects the measures necessary for the prevention of offenses in the Company and actively collaborates in the prevention of corruption.

Article 15 - Behavior during the performance of the service

In compliance with the contractual provisions, the employee, unless justified reason, does not delay or entrust to other colleagues the carrying out of activities or the adoption of decisions within their competence.

The employee does not use the telematic and telephone services as well as the material or equipment available for office reasons for private purposes, except in the cases permitted by the Company.

The employee who has the Company's means of transport uses it exclusively for the performance of his office duties and does not routinely transport people outside the Organization, except in the cases permitted by the Company.

Each employee, collaborator and in any case person who works on behalf of the Company is required to work diligently to protect company assets, through responsible behavior and in line with the operating procedures prepared for their correct use, documenting their use with precision. Each is responsible for the protection of the resources entrusted to him and has the duty to promptly inform the Administrative Body of any threats to the Company.

In particular, each must:

- » avoid private use of company assets, outside the allowed hypotheses;
- » scrupulously and sparingly use the assets entrusted to him;
- » avoid improper use of company assets that may cause damage or reduce efficiency or, in any case, conflict with the interest of the Company.
- » Regarding computer applications, each is required to:
 - » use them according to the indications and for the purposes for which they are made available;
 - » scrupulously adopt the provisions of company security policies, in order not to compromise the functionality

and protection of computer application systems;

- » do not send threatening or abusive e-mails, do not indulge in inappropriate language, do not express inappropriate comments that may offend the person and / or damage the corporate image;
- » do not surf on websites for personal purposes and, in any case, do not surf for any reason on sites with indecent and offensive content.

The employee, in relation to the purchase of goods or services for office reasons, does not accept for personal use, nor does he hold or enjoy in a personal capacity, any benefits due to the buyer.

CHAPTER 3

CRITERIA OF CONDUCT IN RELATIONS WITH STAKEHOLDERS

Article 16 - General criteria of conduct in relations with Stakeholders

The term "Stakeholders" means to refer to subjects who come into contact with the Company, who have autonomous interests to respect and enhance; within this category are members, collaborators-employees, customers, the community and the market.

The Company operates in compliance with current legislation for the achievement of corporate purposes. All company activities are carried out in compliance with the principles and procedures dictated for this purpose.

The Company requests the Administrative Body, employees, commercial partners and anyone who performs representative functions in any capacity, including de facto:

- » respect compliance with the laws in force, with the principles set out in this Code and with the procedures pre-ordained for carrying out company activities;
- » irreproachable behavior, such as not to compromise the Company's moral and professional reliability.

Therefore, all necessary measures are taken to comply with current legislation, the principles and procedures with which the Company has adopted itself.

Article 17 - Relations with customers

17.1 Equality and impartiality

The Company undertakes not to discriminate against its customers and to create with them a relationship characterized by high professionalism, oriented towards respect, courtesy and the search / offer of maximum collaboration, in compliance with current regulations and contracts entered into.

17.2 Contracts and communications with customers

Contracts and communications are characterized by clarity and comprehensibility and, therefore, must be drafted in a language that all interlocutors can understand, avoiding obscure clauses that are only understandable by experts, and clearly illustrating each item costs.

Furthermore, contracts and communications will comply with current regulations, without recourse to elusive or incorrect practices; they will also be characterized by completeness and precision, so as not to neglect any element relevant to the customer's decision.

Furthermore, the Company must communicate to the interested parties, promptly, any information relating to:

- » any changes to the contract;
- » any changes in the economic and technical conditions of service delivery and / or sale.

In the conclusion of agreements and shops and in the stipulation of contracts on behalf of the Company, as well as in the execution phase of the same, the employee does not resort to third party mediation, nor does he correspond or promises any usefulness as an intermediary, nor to facilitate or have facilitated the conclusion or execution of the contract.

The above paragraph does not apply to cases in which the Company has decided to resort to professional brokerage.

17.3 Interaction with customers

The Company undertakes to create a relationship of trust and collaboration with its customers, periodically checking the achievement of the improvement objectives of the service provided.

Article 18 - Relations with Clients

The Company analyzes the adequacy and feasibility of the services requested in a timely manner, with particular regard to the regulatory, technical and economic conditions, so as not to undertake contractual commitments that can put the Company in the condition of having to resort to savings that adversely affect quality of performance and work safety.

The Company ensures fairness and clarity in commercial negotiations and in assuming contractual obligations, as well as the faithful and diligent fulfillment of the same.

Article 19 - Relations with Consultants

The Company undertakes not to arbitrarily discriminate against its consultants.

Consulting means an intellectual specialist service carried out by a professional or professional office which, having ascertained experience and practice in a subject, assists and advises the Company in carrying out its activities or provides information and opinions that can create added value and support decisions, promoting development in the activity in question. In this context, the relationship of trust between the client and the consultant is substantial, this trust can be based on a consolidated relationship, on the reputation of the consultant or on the academic and professional qualifications that he possesses.

The choice of consultants and the consequent contractualisation will take place on the basis of an assessment of their professionalism.

The relationship of the Company with consultants is based on the regulatory principles of good contractual faith and the correct execution of mutual obligations; in addition, the Company rejects any behavior of consultants contrary to the law and / or the principles of this Code.

The behavior of external consultants must be based on availability and respect for company needs, with a view to a loyal, correct and highly professional collaborative relationship.

Article 20 - Relations with Suppliers

20.1 Choice of supplier

In choosing its suppliers, the Company, due to the peculiarity of its business, is inspired by the principles of transparency, competition and a level playing field, implementing objective assessments in relation to the competitiveness, quality, usefulness and price of the supply, as well as its reliability.

The Company adopts objective and transparent supplier selection criteria, without precluding any potential supplier, in possession of the required requirements, from the possibility of competing for the award of a contract.

Each selection procedure must be carried out in compliance with the broadest conditions of competition and any possible derogation from this principle must be adequately motivated.

20.2 Transparency and integrity

In order to ensure maximum transparency, the Company regulates relations with suppliers as well as the stipulation of financial and consultancy contracts with appropriate procedures.

Relations with suppliers must be characterized by clarity, transparency, loyalty and fairness.

20.3 Protection of ethical aspects in supplies

The Company undertakes to promote, within the scope of the supply activities, compliance with the hygienic-sanitary conditions of the environment in which they occur and to ensure that they are carried out in compliance with current legislation and ethical principles.

In the event of any contracts with suppliers based in countries at risk (defined as such by recognized organizations as regards, for example, the risk of corruption or terrorism), contractual clauses are introduced which provide for a self-certification by the supplier of the adherence specific social obligations (for example, measures that guarantee respect for workers' fundamental rights, the principles of equal treatment and non-discrimination, protection of child labor).

In order to comply with the principles of transparency and fairness, the Company guarantees the equal treatment of the companies with which it comes into contact.

The assessment of compliance with the contractual conditions is carried out objectively by the Company and must result from written documentation.

The related accounting will be completed within the established time.

Article 21 - Confidentiality and transparency

In order to protect the confidentiality of the information communicated by the companies with which it comes into contact, as well as to ensure transparency in relations, the Company refrains from disseminating and using, for personal purposes, the information it has available for reasons. ex officio, without prejudice to compliance with the rules and regulations that protect the right of information and access.

Article 22 - Independence and duty of abstention

In order to comply with basic principles of correctness, as well as the ethical ones referred to in this Code, those who work within or in any case in favor of the Company do not perform activities in contrast with the tasks entrusted to them and avoid any involvement in situations that may harm the interested parties or the image of the Company.

Article 23 - Staff Policies

23.1 Rules of conduct regarding the use of coins, public credit cards and stamps

The recipients of this Code are strictly prohibited, in activities that involve the use of coins, public credit cards or stamp duty, any conduct of falsification of these goods or of use or possession aware of these goods if they are false.

23.2 Rules of conduct regarding the use of money, goods or other benefits received from third parties

During the procurement of goods, all recipients of the Code of Ethics are required to verify, as far as possible, that they are not the result of a crime.

The aforementioned recipients also observe the internal provisions on the management of financial flows, as well as the specific anti-money laundering regulations and procedures.

23.3 Duties of the Administrative Body

The Administrative Body has the duty to observe the current regulations and to respect the principles of this Code.

The Administrative Body actively collaborates in any control ordered by the Company, by the Supervisory Body as well as by administrative or judicial Authorities. The same has the obligation to constantly deal with the Supervisory Body and to make it aware of every element useful for carrying out the activity within its competence.

23.4 Selection and hiring of staff

The Company evaluates the staff to be hired using correctness and transparency criteria and analyzing the profiles of the candidates on the basis of company needs and, within the limits of the information available, avoids any form of favoritism in the selection of personnel to be hired.

The staff is hired with a regular contract.

The Company refrains from giving life to any form of irregular work, as well as from using particular types of contracts in order to circumvent mandatory rules.

23.5 Staff management

The Company does not tolerate any form of discrimination against its employees.

Company policy is aimed at assigning roles and skills on the basis of the concrete skills possessed by its employees; in addition, compatibly with the company organization, flexibility in working hours is facilitated which facilitate the management of the state of maternity and, in general, the care of children by staff.

The assessment of employee activity is carried out by involving all the different company functions to which it awaits.

23.6 Enhancement and training of personnel

The Company's collaborators and employees are considered an integral part and indispensable factor for growth and development; for this reason, it protects and promotes the value of human resources in order to improve and increase the intellectual heritage and the competitiveness of the skills possessed by each collaborator. The Administrative Body uses and fully enhances all the professional skills present in the company, in order to encourage the professional development and growth of its employees and collaborators.

The Company makes information and training tools available to all employees and collaborators, with the aim of enhancing their specific skills and professionalism.

Staff training may take place both on-site through specific courses, and remotely via the Internet, intranet or other electronic devices. The training path of each collaborator is documented and archived by the Company.

23.7 Safety and health

The Company is committed to spreading and consolidating a culture of safety, developing risk awareness among staff and promoting responsible behavior by all employees and collaborators. The same also works to ensure, especially through preventive actions, the hygiene, health and safety of workers.

The main objective of the Company is to protect employees and collaborators, allowing them to work in a suitable and safe environment.

The Company, in fact, is particularly sensitive to the issue of safety in the workplace and undertakes daily to operate in compliance with current regulations, in particular, with the provisions of Legislative Decree no. 81/2008 and subsequent mm. and ii ..

With this in mind, the Company is committed to pursuing the policy of health and safety in the workplace through:

- » the introduction of an integrated risk and safety management system;
- » with a continuous analysis of the risk, of the criticality of the processes and functions to be protected;
- » the adoption of the best technologies;
- » the replacement of equipment and work tools assessed at risk;
- » the control and updating of working methods;
- » the contribution of training and communication interventions.

23.8 Obligations of workers

Each worker must take care of his own health and safety and that of other people present in the workplace, on which the effects of his actions or omissions fall, in accordance with his training, instructions and means provided

by the employer.

Workers must, in particular:

- a) contribute, together with the employer, managers and supervisors, to the fulfillment of the obligations envisaged to protect health and safety in the workplace;
- b) observe the provisions and instructions given by the employer, managers and supervisors, for the purpose of collective and individual protection;
- c) correctly use work equipment, dangerous substances and preparations, means of transport and safety devices;
- d) use the protective devices made available to them appropriately;
- e) report immediately to the employer, to the manager or to the person in charge the deficiencies of the means and devices referred to in letters c) and d), as well as any eventual dangerous conditions of which they become aware, taking direct action, in case of urgency, within the sphere of his / her own competences and possibilities and without prejudice to the obligations referred to in letters f) and g) below, to eliminate or reduce situations of serious and impending danger, by informing the workers' representative about safety;
- f) not to remove or modify the safety or signaling or control devices without authorization;
- g) do not carry out operations or maneuvers on their own initiative which are not within their competence or which may compromise their own safety or that of other workers;
- h) participate in training and education programs organized by the employer;
- i) undergo the health checks provided for by the relevant laws or, in any case, ordered by the competent doctor.

Workers of companies that carry out activities under the contract or subcontracting regime must display a specific identification card, accompanied by a photograph, containing the employee's details and the indication of the employer. This obligation also applies to self-employed workers.

23.9 Protection of the person

The Company protects its employees and collaborators by guaranteeing working conditions that respect the dignity of the person.

The Company condemns any act of sexual harassment, as well as any behavior that could disturb the sensitivity and dignity of the person. To this end, it incorporates the text of the "Regulations for the protection of the dignity of women and men within the Company", approved in concert with the trade unions on 24 October 1997, into this Code.

The Company does not tolerate discrimination related to age, sex, race, health, nationality, political opinions and religious beliefs and undertakes to protect workers from acts of psychological violence, contrasting any attitude or behavior discriminatory or harmful to the person, his beliefs and preferences.

The Company will periodically check the existence or otherwise of discrimination of any kind in the workplace, making the related data available to the Supervisory Body.

23.10 Information management

The Company complies with the data processing provisions of the current Regulation (EC) 27/04/2016, n. 2016/679 / UE, relating to the protection of individuals with regard to the processing of personal data, as well as to the free movement of such data and which repeals Directive 95/46 / EC (General Data Protection Regulation - so-called "GDPR"), as appropriate to the Italian legislation through the Legislative Decree 10/08/2018, n. 101, in its capacity as holder of treatments aimed at the regulatory compliance of the GDPR, from which different responsibilities and charges arise with regard to the protection of personal data.

In particular, the Company protects the privacy of all those who collaborate or operate with it - in accordance with the provisions of the aforementioned legislation - and adopts behavioral standards that provide for the prohibition (subject to the exceptions provided by law) to communicate or disseminate data personal of which the same Company came into possession without the prior consent of the interested party.

Each employee or collaborator is informed of the provisions of company policies regarding information security, to guarantee the integrity, confidentiality and availability of the data with which he comes into contact and is required to comply with it.

The Company does not investigate the ideas and, in general, the private life of its employees and collaborators (except in cases allowed by law).

23.11 Conflict of interest

Employees, collaborators and, in any case, all those who work on behalf of the Company, have a duty to refrain from personally taking advantage of business opportunities as part of their business for the Company.

In the event that a case of conflict of interest occurs between an employee, a collaborator and, in any case, a person operating on behalf of the Company, the person concerned is required to notify the Administrative Body of the Company, which in the manner provided for informs the Supervisory Body and assesses its actual existence on a case-by-case basis.

Article 24 - Institutional relations

The Company, in relations with the State Institutions attributable to the corporate activity, undertakes to:

- » establish, without any type of discrimination, stable channels of communication with all institutional interlocutors at any level;
- » represent the interests and positions of the Companies in a transparent, rigorous and coherent way, avoiding collusive attitudes.

In order to ensure maximum clarity and transparency, those who have received direct mandate from the Administrative Body undertake to establish and maintain relations with the institutions based on the observance of formal and respectful canons.

Article 25 - Relations with Members

The Company undertakes to provide shareholders with accurate, truthful and timely information, also in order to facilitate their participation in corporate decisions.

It is the Company's commitment to protect the company's assets by ensuring high standards in production; the Company also undertakes to promptly communicate to the shareholders any information or news that may be considered relevant. Absolute equal treatment between all members is guaranteed, avoiding preferential behavior.

25.1 Accounting and corporate reporting

Accounting transparency is based on the truth, accuracy and completeness of the basic information for the related accounting records.

Each is required to collaborate in the timely representation of useful information within the accounts.

For each operation, adequate supporting documentation of the activity is kept in the file, in order to allow:

- » easy accounting registration;
- » the identification of the different levels of responsibility;
- » the reconstruction of the operation, also to reduce the risk of interpretative errors.

Each registration must reflect exactly what results from the supporting documentation; it is the task of all those who await you to ensure that the documentation is easily traceable and is ordered according to logical criteria.

All those who become aware of omissions, falsifications, negligence of the accounting or of the documentation on which the accounting records are based, are required to report the facts to the Administrative Body; if the aforementioned Body becomes aware of it, they must report to the Supervisory Body, as well as, at the first useful occasion, to the Shareholders' Meeting.

Article 26 - Relations with the Public Administration

The Company maintains relations with the Public Administration characterized by fairness and transparency.

For the purposes of this Code, Public Administration must be understood to mean any public body, independent administrative agency and natural or legal person acting as a public official or public service employee.

The undertaking of commitments towards the Public Administration and, in any case, the Public Institutions is reserved exclusively to the corporate functions in charge and authorized, in compliance with the most rigorous observance of the applicable legal provisions and regulations, and cannot in any way compromise the integrity and the reputation of the Company.

To this end, the Company correctly collects and archives the documentation relating to contacts with the Public Administration.

Any activity by those who work on behalf of the Company, aimed at influencing the independence of judgment of the P.U., is absolutely prohibited or, in any case, to ensure advantages of any kind to the Company.

With regard to employees of the Public Administration or officials who act on behalf of the Public Administration, the Company:

- » does not admit any practice, of any nature and in any form, aimed at inducing, facilitating or remunerating a decision or the performance of an official act, or contrary to official duties, by the Public Administration;
- » in particular, it does not admit payments or compensation, in any form, or acts of commercial courtesy (such as gifts or forms of hospitality), even simply offered, to managers, officers, employees and, in any case, to anyone acting on behalf of a Public Administration, or their relatives or agents, except in the case of use utilities of modest value that cannot be interpreted in any way as a tool to condition the action of the Public Administration, the Company also does not accept any promise of opportunity for use, advantages or other benefits towards the above subjects;
- » when dealing with the Public Administration, anyone working on behalf of the Company must not try to improperly influence the positions of those who negotiate or make decisions on behalf of the Public Administration;
- » in the specific case of tenders with the Public Administration, the Company will operate in compliance with the law and correct commercial practices;
- » in relations with the Public Administration, the Company is not represented by consultants or third parties, when this may lead to a conflict of interest.

Any violation of the above indications, even in the form of a mere attempt, by anyone operating, even indirectly, on behalf of the Company, must be promptly reported to the Administrative Body and to the Supervisory Body, which in common agreement will take the appropriate measures and adopt disciplinary sanctions provided by the Organizational Model.

Article 27 - Relations with political / trade union parties, organizations and associations

In making any contributions to parties, movements, committees and political and trade union organizations, or to their representatives and candidates, the Company strictly adheres to the provisions of current legislation.

Article 28 - Contributions and sponsorships

The Company can contribute to requests for contributions from bodies and associations declared to be non-profit and with regular statutes and articles of association, which are of high cultural, social or beneficial value or, in any case, involving a significant number of citizens.

Sponsorship activities for companies, consortia, private-law entities and / or public-law entities, which may concern the themes of culture, social, environment, sport, entertainment and art, are intended to events that offer quality assurance or for which the Company can collaborate in the design, in order to guarantee its originality and effectiveness.

Article 29 - The environment

The environment is the primary asset that the Company is committed to safeguarding.

All those who work on behalf of the Company and, in any case, all the recipients of this Code, are required to contribute to the process of protection and protection of the environment, in particular by paying the utmost

attention to avoiding any unloading and / or illegal emission of materials or harmful waste.

The Company operates in line with the following principles:

- » manage waste in a sensitive way, paying particular attention to waste disposal rules and procedures;
- » design and implement production processes and company activities with criteria aimed at preventing pollution, reducing environmental impacts, preventing possible accidental events, safeguarding the health and safety of employees and the population, adopting the best available techniques for this purpose on the market;
- » guarantee compliance by all those who work on behalf of the Company with current environmental and safety legislation, ensuring constant staff updating on developments in the reference regulatory landscape and raising awareness of the environmental protection objectives it pursues.

Article 30 - Consumer protection

For the Company, it is essential that the market is based on principles of correctness and good practices, which is why it is committed to scrupulously observing and observing consumer protection laws and to put in place all regulatory obligations aimed at ensuring the certainty and transparency of the just operated. The recipients of this Code undertake not to engage in any conduct that is contrary to the law or that could harm consumers.

CHAPTER 4

METHOD OF IMPLEMENTATION AND CONTROL OF THE CODE OF ETHICS

Article 31 - The violation of the Code of Ethics

The violation of the obligations under this Code integrates conduct contrary to corporate duties. Without prejudice to the cases in which the violation of the provisions contained in this Code also gives rise to criminal, civil, administrative liability of the employee, it is a source of disciplinary responsibility ascertained at the end of the disciplinary procedure, in compliance with the principles of graduality and proportionality of the sanctions.

For the purpose of determining the type and extent of the disciplinary sanction that is actually applicable, the violation is assessed in each individual case with regard to the seriousness of the behavior and the extent of the prejudice, including moral prejudice, deriving from the decorum or prestige of the Company.

The applicable sanctions are those provided by the "National Collective Bargaining Agreement for the metalworking sector for male and female workers in the private metalworking industry and for the installation of systems", to be assessed in relation to the seriousness of violation of the provisions and / or violation of the bond of loyalty.

The further obligations and the consequent hypotheses of disciplinary responsibility of the employees provided for by law, regulation or collective agreements remain unaffected.

In the event of a violation of this Code by the Administrative Body or by collaborators of the Company not subject to the hierarchical system, the most suitable measures as provided for by the Organizational Model will be applied.

As part of the professional collaboration contracts and the supply of goods, services and work, express termination clauses will be included in relation to conduct contrary to the principles of this Code of Ethics.

All interested parties, internal and external, are required to report any non-compliance with the Code in writing.

Reports must be submitted to the Supervisory Body.

The SB, in compliance with legal precautions, will listen separately to the author of the report and the person responsible for the alleged violation and will inform the Administrative Body, or will proceed in accordance with the rules introduced by Law no. 197/2017 and subsequent mm. and ii. on whistleblowing.

31.1 Violations of the Code of Ethics related to Legislative Decree 231/01

The adoption of the ethical principles relevant for the prevention of the offenses envisaged by Legislative Decree 231/01 constitutes an essential element of the preventive control system.

Consequently, the behavioral rules provided for in this Code constitute a basic reference to which the recipients must comply in relations with all the interlocutors, as well as in all those relationships that may give rise to the hypotheses of crime provided for and sanctioned by Legislative Decree 231 / 01.

The Administrative Body immediately reports any violations of this Code to the Supervisory Body.

Article 32 - Supervision, monitoring and training activities

Both the Administrative Body and the Supervisory Body supervise the application of this Code, the latter in its predicted quality and on the occasion of the ritual checks.

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ETHICAL CODE

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