



CODE OF ETHICS
To act responsibly





Our **Code of Ethics** is a system of values that inspires our company.

A thought that translates into an action and becomes relevant in every project, activity or relationship.

Fairness, integrity, transparency, protection of people and communities, are the key principles that must guide all our daily actions.

It is only in the respect and sharing of these principles that we think we can make our company even more successful.

TOGETHER.

Giulia Lombardi

Ceo Ital G.E.T.E.



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INTRODUCTION

Let's start with the rights to take on obligations

As a company, as a community and as a person, we have a duty to act with full respect for human rights and the rules that protect them.



ITAL G.E.T.E. Srl (henceforth also the “Company”) has decided to adopt this Code of Ethics, based on the belief that any enterprise that aims to act legitimately in society and in the environment that surrounds it, has the duty to communicate its ethical principles in a clear and transparent manner.

This Code of Ethics (henceforth also the “Code”) aims to summarise, also in accordance with Legislative Decree no. 231/2001, the rules of conduct on which the Company manages its business affairs.

The Code of Ethics defines the set of values on which the Company is based and the set of responsibilities that it assumes both internally and externally. Compliance with the same is of fundamental importance for the good functioning, reliability and reputation of the Company, aspects that constitute a key asset for the success of enterprises in general.

This Code of Ethics has been drawn up according to the main regulations, guidelines and documents in force at a national and international level, in terms of Human Rights, corporate social responsibility and corporate governance. Furthermore the Code also makes reference to:

- the United Nations Charter of Human Rights, the Charter of Fundamental Rights of the European Union, the Constitution of the Italian Republic;
- the “*core labour standards*” as defined by the ILO (International Labour Organization) conventions, the *OECD Guidelines for Multinational Enterprises* (Organization for Economic Cooperation and Development), the United Nations Global Compact, the principles of the Social Accountability 8000 Standard and the Charter of Corporate Values of the European Institute for Social Reporting;
- the existing best practices in the field of codes of ethics.

The Code of Ethics is divided into three sections:

- **charter of ethics:** formalises the Mission and the Values that constitute the key aspects of the culture of the Company;
- **code of conduct:** illustrates the responsibilities and conduct required in order to comply with the Company’s code;
- **implementing and respecting the Code:** identifies those responsible for implementing the Code and explains how to apply and respect the values and standards of conduct defined herein.



CHARTER OF ETHICS

Let's grow together

Work, legality, fairness and transparency are the core values we adopt as we strive towards to continuous economic and social improvement.



2.1 Mission

The entrepreneurial idea on which the Company is based pursues continuous growth and the improvement of its competitive positioning. The driving aspects of future development are its know-how, its search for the most innovative technological standards, and the growth of the distinctive skill-sets of its human resources.

The Company is fully aware that, with its work, its sense of responsibility and moral integrity, it contributes to the process of development of the Italian economy and to the civil growth of the country as a whole.

The Company believes in the value of work and considers legality, fairness and transparency of its actions to be key indispensable prerequisites for achieving its economic and social objectives.

2.2 General principles

- **Centrality of the individual:** the Company recognises Individuals as an expression and foundation of all its values and, therefore, a prerequisite for all its activities. To this end, the Company undertakes to refrain from making any choices that do not respect the physical, cultural and moral integrity of the Individual.
- **Fairness and impartiality:** in relations with its stakeholders, the Company refrains engaging in any form of discrimination linked to gender, sexual orientation, age, nationality, state of health, political opinions, ethnicity and religious beliefs and, in general, to any characteristic of the human person.
- **Integrity and transparency:** the Company disseminates complete, transparent and understandable information, to enable its stakeholders to make informed decisions concerning the relationships to entertain with the same.
- **Experience, excellence, innovation and reliability:** the Company intends to put its experience in the paint production sector at the service of customers so as to best satisfy their demands; it is also committed to constantly improving its processes, products and services, seeking innovative solutions, in compliance with the highest possible quality standards. To this end, it has established its own quality policy, adopted and implemented a quality management system and obtained UNI EN ISO 9001:2015 certification.



- **Health and Safety:** the Company guarantees the health, safety and physical and moral integrity of its employees, collaborators and consultants, in addition to the working conditions that respect individual dignity and Occupational Health and Safety, in compliance with the applicable legislation.
- **Protection of the natural environment:** the Company promotes respect for the environment, intended as a common resource to be safeguarded, to the benefit of the community and future generations, with a view to attaining sustainable development. To this end, it has established its own environmental policy, adopted and implemented an environmental management system and obtained UNI EN ISO 14001:2015 certification.



CODE OF CONDUCT

We act responsibly

Each and everyone of us is called upon to act responsibly and consciously, in accordance with the values that the Company endorses at a day-to-day level.



This section highlights the areas of responsibility and the conduct that the various recipients of the Code shall embrace so as to comply with the values and style of the Company.

The recipients of this Code must scrupulously comply with the legislation in force and the provisions issued in the sectors connected to the respective areas of activity. The Company requires maximum availability and collaboration when dealing with the representatives of the Judicial Authority, the Police Forces, Public Officials who have inspection powers granted by any Public Administration bodies.

The recipients of this Code are required to promptly comply with any request received from competent institutions or authorities.

It is strictly forbidden to destroy, amend records, minutes, accounting records and any type of document (hard or electronic copies) or make false statements to the competent Authorities ahead of a judicial proceeding, an investigation or an inspection.

It is prohibited to try to persuade, by conferring professional positions, gifts or promises of gifts, money or other advantages (directly or through a third party) those who carry out investigations or inspections or the competent judicial authority.

It is also strictly forbidden to engage in relations with witnesses or the parties involved in civil and/or criminal trials in order to disturb their freedom of self-determination.

3.1 Directors

Business sustainability

The entrepreneurial business risk is protected by a prudent and non-speculative policy to safeguard the solidity of the Company with a medium-long term management plan, to promote both economic competitiveness and operational efficiency.

The Company observes high standards of corporate governance to protect its value and reputation, in the interests of all its stakeholders.

3.2 Collaborators

Collaborators are all those who engage in employment or collaboration based relations with the Company that require the existence of a hierarchical relationship. This category also includes all those who represent the company externally and manage relations with stakeholders.



Valorisation of individuals

The Company acknowledges that the main success factor of any company is based on the professional contributions of the people who work there, within a framework of loyalty and mutual trust. From this point of view, the creation and preservation of a serene and proactive work environment are deemed to be highly important aspects, in addition to the respect of the private lives of its collaborators, and the protection of equal opportunities, guaranteeing growth paths based exclusively on personal merits, on skills and aimed at consolidating the level of expertise of each individual.

This means that, also in the selection phase, the Company makes assessments based on the correspondence between the expected profiles and the candidate profiles, transparent and verifiable considerations of merit and also adopts appropriate measures to avoid all and any form of discrimination and favouritism.

In addition, the Company guarantees its employees a training pathway aimed at combining the needs of company growth with the training needs expressed by workers and places the appropriate tools for professional development and updating at their disposal.

Protection of physical and moral integrity

The Company undertakes to guarantee a work environment that complies with current Occupational Health and Safety regulations, by means of the prevention, monitoring and management of the risks connected with the performance of individual work activities. The Company's objective in this regard is to prevent occupational accidents or diseases linked to workplace conditions, by taking all necessary and appropriate actions such as, for instance, the continuous training of company personnel on their designated tasks and safety issues, the consistent investment of resources in the purchase/hire of machinery in compliance with the highest standards of prevention and safety, ongoing maintenance of equipment and existing vehicles, as well as the careful monitoring over the level of compliance by collaborators with what is set forth by law and corporate rules and regulations.

In line with this objective, the collaborators and all the other responsible individuals involved (occupational physician, prevention and protection service manager, the workers' safety representatives) shall collaborate, within the scope of their respective functions and responsibilities, to eliminate or progressively reduce the source of risks and improve working conditions.



Collaboration and sharing

Collaboration and sharing are considered to be important aspects of conduct within the Company, as they allow for the creation of a harmonious and stimulating work environment, based on mutual trust and respect. In this way, a positive atmosphere of collaboration develops within the company, which allows us to find valid and effective solutions to the problems encountered at the workplace. Each individual shall try to contribute to the execution of management activities, to improve operational efficiency and to achieve excellent levels of performance.

Conflict of interests

A conflict of interest occurs when a collaborator of the Company uses his or her position for personal gain or if personal interests conflict with the interests of the Company.

Therefore each individual must avoid any investment, interest or involvement that interferes, or could interfere, with his or her ability to make impartial assessments or decisions on behalf of the Company.

Conflicts of interests may arise from situations that include but are not limited to the following:

- engaging in economic and financial interests, including through family members, with customers, suppliers, competitors, Public Administration, etc. (e.g. significant ownership of shares, professional appointments etc.);
- using one's position within the Company or the information acquired through work in such a way as to create conflict between personal interests and the interests of the Company.

Anyone who finds him or herself operating in conflict of interest is required to immediately notify Senior Management and refrain from continuing to carry out said activities.

Ethical and transparent conduct

An ethical, honest and transparent conduct includes, first and foremost, a proper and appropriate behaviour in the performance of work duties and all procedures, regulations and regulations in force, sharing the Company's mission.

The conviction of acting for the benefit of the Company cannot, in any way, justify the conduct of behaviour in contrast with the principles dictated by this Code of Ethics, whose general observance is of fundamental importance for the good functioning and prestige of the Company.



Payments, gifts and benefits

The collaborators of the family and their closest family members are not allowed to receive or offer money, gifts, utilities or benefits from or to third parties (Public Administrations, customers, suppliers, etc.) to obtain illegal benefits from themselves or the Company.

Any courtesy gifts must have a modest value, comply with the law and be appropriate. It is not allowed to offer or accept cash amounts or other benefits that may be intended as forms of bribery.

Diligence in the Use of Company Resources

All collaborators must act with due diligence to protect the Company resources, through responsible behaviours, in line with the operating procedures defined to regulate their use, avoiding improper uses that may cause damage, decrease the company efficiency or, in any case, be in contrast with its interests.

The collaborators must also protect said goods, and prevent them from being used fraudulently or improperly, either for their own advantage, or that of the Company.

Transparent and correct information

During their work relation with Company, all collaborators must ensure the truthfulness, transparency, accuracy and completeness of the documentation and information provided during the performance of the activities of their responsibility. The operations and/or transactions must be recorded, ensuring that the principle of correctness is complied with, authorised, if necessary, justified and supported by appropriate evidence, so as to be verified, if necessary.

The Company condemns any behaviour aiming at altering the correctness and truthfulness of the data and information contained in financial statements, reports, or any other corporate documents required by law, either addressed to the broad public, or to collaborators, supervisory authorities, the Board of Auditors, independent auditors and any interlocutors.

In particular, collaborators involved in drafting the company's records or financial statements must use due diligence to ensure that said records and statements are truthful and correct.



Confidentiality of information

The collaborators of the Company ensure that confidential information is correctly managed, and must not disclose it to any person, either inside or outside the Company, unless this is not mandatory by law, statutory obligations or internal regulations. Improper use of confidential information goes against company regulations and could constitute a violation of the law.

By way of example, confidential information includes information regarding designs, prototypes of new products, laboratory tests, commercial strategies, characteristics of the organisation.

Protection of Privacy

While performing its activities, the Company protects the personal data of its collaborators and third parties, avoiding any improper use of their information, in compliance with the reference regulations and the protection of the moral integrity of individuals.

3.3 Customers

Customers are all those who use the products and services offered by the Company in various ways.

Quality and efficiency of the products and services provided

The customer's leadership in their sectors and their satisfaction are the main cornerstones of the Company principles that are oriented to the continuous improvement of excellence in terms of performance.

The Company undertakes to reach and maintain the highest standards of quality for the products and services offered to its customers, always meeting the highest quality standards required by the customers and complying with the regulations in force. Moreover, all its actions are oriented to excellence in terms of performance.

As evidence of the above, the Company has adopted management systems according to the UNI EN ISO 14001:2015, UNI EN ISO 9001:2015 standards.

Negotiation and contractual correctness

The contracts drawn up with customers are based on criteria of clarity and completeness, avoiding the use of any deceptive practice, in order to create and maintain over time a sound relationship inspired by the general values of correctness, honesty and professionalism. In the event of unexpected events, the Company undertakes not to take advantage from situations of dependency or weakness of the counterparty.



Relationship Management

The Company, while not precluding any customer or category of customers, does not engage in direct or indirect relationships with individuals who are known or suspected of being members of criminal organisations or operating in an unlawful manner. The Company also undertakes to take all the precautions necessary to verify the reliability of customers operating at an international level, as well as the legitimate origin of the capital and means used by the same within the context of the company's relations with the same.

Payments, gifts and benefits

It is strictly forbidden to offer or receive, either directly or indirectly, to or from customers any gifts and/or benefits (money, valuables, services, works, favours or other utilities) that may lead to unlawful actions or that may in any case be interpreted by an impartial observer as aimed at obtaining an economic or other benefit and that breach mandatory law provisions, regulations and the principles of this Code.

Protection of personal data

In order to ensure the protection of personal data, the Company undertakes to process them according to the reference regulations and, specifically, according to the principles of transparency, lawfulness, quality assurance and fairness. The Company ensures the use of confidential information for strictly professional reasons only.

3.4 Public Administration

“Public administrations” include all those entities, governed by public or by private law, that perform a “public function” or a “public service”, and that interact with the Company and its collaborators. They include, by way of example, but not limited to: local public entities (Municipalities, Provinces, Regions, etc.), INPS (the Italian National Social Security Institute), Local Health Authorities, the Italian Privacy Authority, the Italian Financial Police, NAS (the Italian Anti-Adulteration Units), the National Fire Service, the Local Police etc.

Compliance with laws, fairness and transparency in the relations with the Public Administration

In its relations with the Public Administrations, the Company is inspired by the fairness and transparency of its operations.

The persons in charge of engaging in any negotiation, request, or institutional relation with Public Administrations shall not improperly influence any decision, or behave unlawfully, for instance offering money or other utilities that may alter the independence of judgement of the Public Administration representative.



Unlawful behaviours include altered statements or documents, omitted information or, in general, a fraudulent conduct characterised by artifice and deception aimed at obtaining a job order, the award of a tender, the award of a contract or of concessions, authorisations, financing or contributions by the European Union, the State or any Public Entity.

In participating in tenders, the Company carefully evaluates the adequacy and feasibility of the services requested.

Selection of third parties for the management of relations with the Public Administration

Should the Company appoint a consultant or a third party to be represented in its relations with the Public Administrations, these subjects, operating on behalf of the Company must be duly informed in writing of the principles contained in this Code of Ethics.

In the relations with the Public Administrations, the Company shall not be represented by third parties that may have a potential conflict of interest or have a negative reputation.

Management of computer or electronic systems of the Public Administrations

In the relations with the Public Administrations, it is forbidden to alter the operation of a Public Administration computer or electronic system, or to manipulate data contained therein so as to obtain an unfair profit.

Payments, gifts and benefits

The offering of goods or other benefits to representatives, officials or employees of the Public Administration is strictly prohibited, even through a third party, provided they are gifts of modest value and are in accordance with customs and cannot be mistaken for an attempt to seek undue favours.

Work relations with former employees of the Public Administration

Hiring or having any kind of work relation with Public Administration employees or former employees (or any of their relatives) that, while performing their roles, have or have had relations with the Company must be in full compliance with the standard Procedures identified by the Company concerning the selection of its employees and collaborators. The prior role of the candidate may not in any case influence the final decision regarding the work relationship.



3.5 Suppliers and sub-contractors

Contributions and grants

The Company guarantees the correctness and completeness of the documentation prepared to obtain contributions, financing, authorizations and concessions from the Public Administration (European Community, State, Local Authorities).

It also ensures that any contributions or funding obtained will be used according to the purposes they were applied for and granted.

The suppliers and sub-contractor category also includes those subjects who, for various reasons supply goods, services and resources required in the realisation of activities and contribute to determining the quality and efficiency of the final product offered to the customer.

Good faith

The Company establishes long-term relations with its suppliers and partners, basing any agreement with them on trade fairness and transparency, and requesting them to operate in a manner compatible with respect for the person and the environment.

Selection and assessment of suppliers

The supplier selection process is based on objective assessments performed according to principles of correctness, quality, convenience, innovation, continuity, loyalty, timeliness and ethical conduct; where possible, it is also based on the promotion of local suppliers.

Ethical aspects of supplies

The Company requires suppliers and subcontractors to comply, in addition to the commitments made on the basis of the commercial parameters of effectiveness / efficiency, with the best practices in terms of human rights and the environment, as well as to sign the principles set forth in this Code of Ethics and to undertake to ensure compliance in a concrete manner.

The Company undertakes to avoid situations of dependence that may affect the activity of the supplier and aims at achieving the common economic and ethical objectives in an environment of trust and collaboration.

Payments, gifts and benefits

The payments to the suppliers of goods and services must always be commensurate with the supply specified in the contract, and may exclusively be paid to the other party to the contract.

The Company strictly forbids to offer or receive gifts and/or benefits (money, valuables, services, works, favours or other utilities) to/from



suppliers and/or their representatives, be these potential or real, that may lead to unlawful actions or that may in any case be interpreted by an impartial observer as aimed at obtaining an economic or other benefit.

In its relations with suppliers, the Company prohibits behaviours or stigmatising omissions and forms of control that may favour unlawful activities connected to money laundering and to the receipt and use of goods or utilities of illegal origins, both in Italy and abroad, along with behaviour aimed at soliciting or accepting any personal advantage to/from employees of the supplying companies in relation to business matters.

Protection of the health and safety of suppliers and sub-contractors

The Company undertakes to disseminate a culture of occupational health and safety with suppliers and sub-contractors putting in place adequate preventive actions of an organisational and technical nature. The Company verifies that the requirements of its contractors correspond over time to those required by company procedures and qualification systems.

Confidentiality of information and intellectual property

In full compliance with the regulations governing this aspect, the Company maintains the strictest confidentiality with regard to information that is strategic, confidential or related to the intellectual property of its suppliers and partners, that are expected to do the same.

3.6 Consortia, ATIs, joint ventures, partnerships

The commercial partners are all those who, for various reasons (consortia, ATI, joint ventures, partnerships), supply goods, services and resources, necessary to the realisation of the activities and which contribute to determining the quality and efficiency of the final product offered to the customer.

Selection and assessment of trade partners

The trade partner selection process is based on objective assessments performed according to principles of correctness, quality, convenience, innovation, continuity, loyalty, timeliness and ethical conduct; where possible, it is also based on the promotion of local suppliers.



Payments, gifts and benefits

The payments to the suppliers of goods and services must always be commensurate with the supply specified in the contract, and may exclusively be paid to the other party to the contract.

Selection of business partners

Business partners shall accept and endorse all the rules and regulations envisaged of this Code.

3.7 Competitors

The Company adopts a trade policy that strives to ensuring market competitiveness, operating in compliance with the laws and regulations in force on the subject of competition and prohibiting the adoption of unfair competition methods.

3.8 Community and environment

These are the interlocutors whose interests are influenced by the direct and indirect effects of the Company's activities. By way of example, but not limited to: the local communities, mass-media and the natural environment.

Economic and social conduct

With a view to improving the social context in which it operates, the Company is committed to sensitive topics, that are important for the community, such as unemployment and culture.

In any external communications, the information regarding the Company and its activities must be truthful, clear, verifiable. In this regard, employees shall refrain from any form of behaviour or statements that could in any way harm the reputation and the interests of the Company.

Donations and charitable contributions

For its donations and charitable contributions, the Company selects initiatives that ensure quality, that stand out for their ethical message and that contribute to social development.



Protection of the environment

Notwithstanding the compliance with the applicable specific standards, the Company adopts appropriate measures to protect the environment and the community, promoting the development of activities in a manner that is consistent with that objective, and promoting awareness.

When it promotes the design of new products such as spray paints or packaging it carries out all the investigations needed to verify any possible environmental risks and prevent them from arising. The assumption of the Company's environmental policy is expressed by the belief that the environment is a common asset to be safeguarded. The Company therefore undertakes to inform its collaborators so that they are aware of the environmental aspects and impacts connected to their activities and how to reduce the effects of their actions.



IMPLEMENTATION AND RESPECT OF THE CODE

We value every choice

Every action is a choice.
What we do defines what we are, in life, in
society, at work.



4.1 Obligations of the recipients

Company collaborators must uphold and enforce the principles of this Code without distinction or exception, in Italy or abroad. The belief that one is acting in favour or to the advantage of the Company can never, in any way, justify any behaviours that conflict with the regulations, principles and contents of the Code.

4.2 Disciplinary actions

Respect of the principles of the Code is an essential part of the contractual obligations towards the Company, pursuant to and in accordance with applicable law. The Company is committed to enforcing this Code also through the timely application of the sanctions envisaged by the disciplinary system, by the applicable Collective Bargaining contract or by the reference contracts signed with the related counterparties.

4.3 Communication and Training

The Code of Ethics is brought to the attention of all recipients by means of communication activities and their approval is formalised by sending the same accompanied by the following sentence: ***“Your approval of this Code of Ethics shall be deemed as granted if no observations are received within 10 days from the date of sending the document”***

This Code is available on the Company’s website and is distributed to the recipients according to the methods deemed most suitable, from time to time, for effective disclosure.

In order to strengthen the sharing of the Code of Ethics, the Company works alongside the appointed functions by stimulating adequate training pathways that make it possible to clarify every aspect relating to the application of the Code of Ethics.

4.4 Updates

With a resolution passed by the Board of Directors, the Code can be modified and integrated, also on the basis of suggestions and indications submitted by third parties.



4.5 Reports

Communications to Senior Management (such as the reporting of an alleged violation, a request for a clarification or an opinion) shall preferably be submitted in a non-anonymous form and may be sent by the recipients and all other stakeholders to the following contact details:

EMAIL: info@italgete.it

DELIVERY ADDRESS: Messrs. SENIOR MANAGEMENT
c/o ITAL G.E.T.E. Srl
Via Strada per Caselle, 16
20081 Morimondo (MI)

The Company undertakes to protect, in the event of intimidation or retaliation, those who in good faith submit reports of alleged or obvious violations of the Code, pursuing offenders with the disciplinary actions applicable from time to time.

Do you want to know more?

Do you need further information?

Are you unsure how to interpret certain indications contained in the code of ethics?

Do you want to make enquiries or report something?



Write to info@italgete.it, or send your enquiry to the attention of **Senior Management**.

www.italgete.it



Via Strada per Caselle, 16
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