



CODE OF ETHICS
For responsible action





Our **Code of Ethics** is a system of values by which our company is inspired.

A thought that translates into action and gains prominence in every project, activity or relationship.

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

Only by respecting and sharing these principles can we achieve the most significant success of our enterprise.

TOGETHER.

Giulia Lombardi

Chairman of the board Itai G.E.T.E.



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FOREWORD

We start with rights to assume duties

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



ITAL G.E.T.E. Srl (hereinafter also the “Company”) has decided to adopt this Code of Ethics, based on the conviction that any organization that wishes to act legitimately in society and in its surrounding environment has a duty to communicate its ethical principles in a clear and transparent manner.

This Code of Ethics (hereinafter also referred to as the “Code”) is intended to summarize, also in light of Legislative Decree No. 231 of 2001, the rules of conduct that the Company sets as the basis for conducting its business.

The Code of Ethics defines the set of values on which the Company is based and the set of responsibilities it assumes internally and externally. Its observance is of fundamental importance for the proper functioning, reliability and reputation of the Company, factors that are decisive assets for business success.

This Code of Ethics has been prepared in accordance with the main existing national and international regulations, guidelines and documents on Human Rights, corporate social responsibility and corporate governance. In particular, the Code is inspired by:

- The United Nations Charter of Rights, the European Union Charter of Rights, the Italian Constitution
- the “core labor standards” covered in the ILO (International Labor Organization) conventions, the OECD (Organization for Economic Co-operation and Development) Guidelines for Multinational Enterprises, the United Nations Global Compact, the principles of Social Accountability 8000, and the Charter of Corporate Values of the European Institute for Social Reporting;
- existing best-practices on codes of ethics.

The Code of Ethics is divided into three sections:

- **ethical charter:** formalizes the Mission and Values that form the foundation of the Company's culture;
- **Rules of Conduct:** notes the responsibilities and behaviors to be held in order to conform to the Company's style;
- **Ways to implement and comply with the Code:** identifies those responsible for implementing the Code and explains how to apply and comply with the defined Values and standards of behavior.



ETHIC PAPER

We grow together

Labor, legality, fairness and transparency are the values that guide our aspiration for continuous economic and social improvement.



2.1 Mission

The entrepreneurial idea that drives the Company is the propensity toward continuous growth and improvement of its competitive positioning

The driving factors of development are to be found in know-how, the search for the most innovative technological standards, and the growth of the distinctive skills of human resources.

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

The Company believes in the value of work and considers legality, fairness and transparency of action to be indispensable prerequisites for the achievement of its economic and social objectives

2.2 General principles

- **Centrality of the Person:** the Company recognizes the Person as the expression and foundation of all values and, therefore, the prerequisite of all its activities. To this end, the Company undertakes to renounce a priori all choices that do not respect the physical, cultural and moral integrity of the Person.
- **Fairness and impartiality:** in its relations with its interlocutors, the Company avoids any form of discrimination related to sex, sexual orientation, age, nationality, state of health, political opinions, ethnicity and religious beliefs and in general any characteristic of the human person.
- **Fairness and Transparency:** the Company disseminates complete, transparent and understandable information to enable its stakeholders to make informed decisions about their relationships with it.
- **Experience, excellence, innovation and reliability:** the Company intends to put its experience in the paint manufacturing sector at the service of its customers in order to best meet their needs; it is committed to constantly improving its processes, products and services, seeking innovative solutions, in compliance with the highest quality standards. To this end, it has set its quality policy, adopted and implemented a quality management system and achieved 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, as well as working conditions that respect individual dignity and safe and healthy working environments, in compliance with applicable regulations. To this end, it has established its health and safety policy, adopted and implemented a safety management system, and achieved UNI EN ISO 45001:2018 certification.
- **Protection of the natural environment:** the Company promotes respect for the environment, understood as a common resource to be safeguarded, for the benefit of the community and future generations, with a view to of sustainable development. To this end, it has set its environmental policy, adopted and implemented an environmental management system and achieved UNI EN ISO 14001:2015 certification.



RULES OF CONDUCT

We act responsibly

Each of us is called upon to act responsibly and consciously in accordance with the values that the Company expresses in its daily operations.



This section highlights the areas of responsibility and the behaviors that the various recipients of the Code must maintain in order to conform to the values and style of the Company.

The recipients of this Code must scrupulously comply with current regulations and the provisions issued in the areas related to their respective areas of activity. The Company demands the utmost helpfulness and cooperation with representatives of the Judicial Authority, the Police Force, and the Public Official who has inspection powers on behalf of any other Public Administration.

Recipients of this Code are required to comply promptly with any request from the competent Institutions or Authorities.

It is strictly forbidden to destroy, alter records, minutes, accounting entries and any kind of document (paper or electronic) or to make false statements to the competent Authorities in anticipation of a judicial proceeding, investigation or inspection.

It is not permitted to attempt to persuade, through the conferral of professional appointments, gifts or promises of gifts, money or other advantages (directly or through an intermediary) those who carry out investigations or inspections or the competent judicial Authority

It is also, strictly forbidden to entertain relations with subjects who are witnesses or parties to civil and/or criminal trials in order to disturb their freedom of self-determination.

3.1 Administrators

Business sustainability

Business risk is protected through a prudent, non-speculative policy that is careful to safeguard the soundness of the Company with a medium- to long-term management horizon, to promote both economic competitiveness and operational efficiency.

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

3.2 Contributors

Collaborators are all those who have a subordinate or collaborative relationship with the Company involving the existence of a hierarchical relationship. This category also includes all those who represent the Company externally and take care of its relations with stakeholders.



Valuing people

The Company recognizes that the main factor for the success of any business is the professional contribution of the people working in it, within a framework of loyalty and mutual trust. With this in mind, the creation and preservation of a serene and purposeful work environment, including through respect for the private sphere of its employees, and the protection of equal opportunities, guaranteeing growth paths based exclusively on personal merits, skills and aimed at consolidating the level of professionalism of each person, are considered important.

Therefore, even in the selection phase, the Company makes assessments based on the correspondence between expected and candidate profiles, transparent and verifiable considerations of merit, and takes appropriate measures to avoid any form of discrimination and favoritism.

In addition, the Company guarantees its employees a training path aimed at combining the company's growth needs with the training requirements expressed by workers and makes available the appropriate tools for professional updating and development.

Protection of physical and moral integrity

The Company is committed to ensuring a work environment that complies with current health and safety regulations through the prevention, monitoring and management of risks related to the performance of professional activities. The Company's objective in this regard is to prevent accidents or illnesses related to workplace conditions by putting in place all necessary and appropriate actions such as, for example, the continuous training of company personnel on the activities performed and safety issues, the constant investment of resources in the purchase/freight of machinery complying with the highest standards of prevention and safety and the constant maintenance of existing equipment and means, as well as the careful and diligent monitoring of employees' compliance with the requirements of the law and company regulations.

Consistent with this objective, collaborators and all figures involved (competent doctor, prevention and protection service manager, workers' safety representatives) work together, within the scope of their respective functions and responsibilities, to eliminate or progressively reduce risks at source and improve working conditions.



Collaboration and sharing

Collaboration and sharing are considered relevant behaviors within the Company, as they enable the creation of a harmonious and stimulating work environment based on mutual trust and respect. In this way, a positive climate of collaboration is developed within the organization, which allows for good and effective solutions to problems encountered during work activities. Everyone should strive to make a contribution to the performance of management activities, the improvement of operational efficiency and the achievement of excellence in performance.

Conflict of Interest

Conflict of interest occurs when an employee of the Company uses his or her position for personal profit or if personal interests conflict with the interests of the Company.

Therefore, each employee must avoid any investment, interest or involvement that interferes, or may interfere, with his or her ability to impartially evaluate or make decisions on behalf of the Company.

By way of example, but not limited to, the following constitute conflicts of interest:

- having 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 in the Company or information acquired in one's work in such a way that may create a conflict between one's own interests and those of the Company.

Anyone found to be acting in a conflict of interest is required to immediately notify the Company Management and refrain from performing the conflicting activity.

Ethical and transparent conduct

Ethical and transparent conduct includes, first and foremost, decent behavior in compliance with current commitments, procedures, regulations and legislation sharing the mission of the Company.

The conviction that one is acting for the benefit of the Company cannot, in any way, justify the holding of conduct contrary to the principles dictated by this Code of Ethics, the generalized observance of which is of fundamental importance for the proper functioning and prestige of the Company.



Gifts and Benefits

It is not permissible for Company employees and their immediate family members to receive or offer money, gifts, utilities or benefits from/to third parties (Public Administration, customers, suppliers, etc.) in order to gain undue advantage for themselves or the Company.

Any acts of business courtesy must be of modest value and must not break any laws or appear inappropriate. It is not permitted to offer or accept cash or other benefits that could be construed as forms of bribery or corruption.

Use of Company Resources

Every collaborator of the Company is required to operate with the necessary diligence to protect the company's resources, through responsible behavior and in line with the operating procedures prepared to regulate the use of the same, avoiding improper uses that may cause damage or reduction of efficiency or otherwise contrary to the company's interest.

Likewise, it is the responsibility of collaborators, not only to protect these assets, but also to prevent their fraudulent or improper use, to their advantage, to third parties or even to the Company.

Transparency and fairness of information

All collaborators in their working relationship with the Company must ensure the truthfulness, transparency, accuracy and completeness of the documentation and information rendered in the performance of the activity for which they are responsible. Operations and/or transactions must be recorded ensuring the principle of correctness, authorized where required, justifiable and supported by appropriate documentary evidence for possible verification.

The Company condemns any behavior aimed at altering the correctness and truthfulness of the data and information contained in financial statements, reports or other corporate communications required by law, or disseminated to the public and directed to collaborators, supervisory authorities, the Board of Statutory Auditors and all its interlocutors.

In particular, collaborators who are involved in the preparation of accounting records or financial statements shall use due diligence to ensure that such records and statements are true and correct.



Confidentiality of information

Company employees ensure the proper handling of confidential information and are required not to disclose it to any person inside or outside the Company, unless required by law or as a result of statutory obligations or internal regulations. Misuse of confidential information is against Company regulations and may constitute a violation of law. By way of example, confidential information is information that relates to products, tenders, business strategies, and characteristics of the organization.

Protection of privacy

In carrying out its business, the Company protects the personal information of employees and third parties, avoiding any misuse of their information, in compliance with relevant regulations and the moral protection of people.

3.3 Customers

Customers are all those who benefit in various capacities, from the products and/or services offered by the Company.

Quality and efficiency of the products and services offered

Experience in its field and customer satisfaction are the cornerstone principles on which the Company orients its organization for continuous improvement of its performance.

The Company is committed to its customers to achieving and maintaining the highest standards of quality in the products and services it offers, aligning itself in every case with the quality targets required by customers and the regulations in force, and directing its actions toward excellence in performance.

To demonstrate this, the Company has management systems in accordance with UNI EN ISO 14001:2015, UNI EN ISO 9001:2015, UNI EN ISO 45001:2018.

Fairness in negotiations and contracts

Contracts entered into with customers are based on criteria of clarity and completeness, avoiding the use of any deceptive practices, in order to create and maintain over time a solid relationship inspired by the general values of fairness, honesty and professionalism. When unforeseen events arise, the Company undertakes not to exploit situations of dependence or weakness of the counterparty.



Relationship Management

The Company, while not expressing any preclusions towards any customer or category of customers, does not entertain any relations, direct or indirect, with persons of whom it is known or suspected to belong to criminal organizations or otherwise operating outside the lawfulness. The Company, moreover, undertakes to take all necessary precautions to verify the reliability of customers operating internationally, as well as the legitimate origin of the capital and means used by them in the context of their relationships with it.

Gifts and Benefits

It is strictly forbidden to offer (or receive), directly or indirectly, to/from customers gifts and/or benefits (money, objects, services, favors or other utilities) such that they could be interpreted by an impartial observer as aimed at obtaining an advantage, even a non-economic one, contrary to mandatory rules of law, 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 in compliance with the relevant regulations and in particular according to the principles of transparency, lawfulness, quality assurance and fairness. The Company ensures that confidential information is used only for strictly professional reasons.

3.4 Public Administration

Public Administration refers to all those entities, whether public or private law, that perform a “public function” or “public service,” with which the Company and its collaborators interact. This includes but is not limited to: territorial public entities (Municipalities, Provinces, Regions, etc.), INPS, ASL, Privacy Authority, Guardia di Finanza, NAS, Fire Brigade, Local Police, etc

Legality, fairness and transparency in relations with the Public Administration

The Company is inspired by and adapts its conduct, in its relationship with the Public Administration, to respect fairness and transparency in negotiations.



Persons entrusted with the task of following up any negotiation, request or institutional relationship with the Public Administration must not attempt to improperly influence its decisions, nor engage in unlawful conduct, such as offering money or other benefits, that may alter the impartiality of judgment of the representative of the Public Administration.

The use of altered, falsified statements or documents or the omission of information or, in general, the performance of artifice and deception, aimed at obtaining a contract, the winning of a tender, the awarding of a contract or, in general, concessions, authorizations, financing, contributions from the European Union, the State or other Public Entity, constitutes unlawful conduct.

In participating in tenders, the Company carefully evaluates the appropriateness and executability of the services required.

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

If the Company uses a consultant or third party to be represented in its dealings with the Public Administration or public service concessionaires, they must accept in writing all the rules of this Code. In dealings with the Public Administration or concessionaire of a public service, The Company shall not be represented by third parties who may have a potential conflict of interest or lack the requisites of honorability.

Management of Public Administration computer or telematic systems.

In the context of relations with the Public Administration, it is also forbidden to alter the operation of a Public Administration computer or telematic system or manipulate the data contained therein in order to obtain an unfair profit.

Gifts and benefits

Offers of goods or other benefits to representatives, officials or employees of the Public Administration, including through intermediaries, are prohibited, unless they are gifts of modest value and conform to custom and cannot be understood as aimed at seeking undue favors.



Employment relationships with former employees of the Public Administration

The hiring or establishment of any employment relationship with former employees of the Public Administration, who in the performance of their duties have had relations with The Company or their relatives and/or relatives-in-law, takes place in strict compliance with the standard procedures defined by the Company for the selection of personnel, without the candidate's previous qualification being able to alter the final decision on the finalization of the relationship.

Grants and Contributions

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 guarantees that the grants or loans obtained are used for the purposes for which they were requested and granted.

3.5 Suppliers and subcontractors

Suppliers and subcontractors are all those who, in various capacities, provide goods, services and resources, necessary for the implementation of activities and who contribute to determining the quality and efficiency of the final product offered to the customer.

Good faith

The Company sets up long-term relationships with its suppliers and subcontractors, basing all agreements on criteria of negotiating fairness and transparency, requiring them to operate in a manner compatible with respect for people and the environment.

Selection and evaluation of suppliers

The process of selecting suppliers and subcontractors is based on objective evaluations according to principles of fairness, quality, technical capacity, environmental sustainability, cost-effectiveness, continuity, loyalty, punctuality and ethicality and, where possible, through the enhancement of local suppliers.

Ethical aspects of ethical and environmental sustainability of supplies

The Company requires suppliers, in addition to compliance with the commitments made according to the commercial parameters of effectiveness/ efficiency provided, also to sign and comply, as an essential condition for business collaboration, with the Code of Conduct for Suppliers prepared by Italgas G.E.T.E., which is based on best practices in human rights and the environment. The Company is committed to avoiding situations of dependence that could undermine the supplier's business and in a context of trust and cooperation with its suppliers, The Company aims to achieve both economic and ethical common goals.



Payments, gifts and benefits

The remuneration to be paid must always be commensurate with the service specified in the contract, and payments may not be made to a person other than the counterparty or contractual party.

The Company absolutely forbids offering or receiving gifts and/or benefits (money, objects, services, favors or other utilities) to/from suppliers and/or their representatives (potential or actual) such as to determine illegal conduct or, in any case, such as could be interpreted by an impartial observer as aimed at obtaining an advantage, even a non-economic one.

In relations with suppliers, conduct that encourages money laundering, receiving and use of goods or utilities of illicit origin both domestically and internationally, as well as conduct aimed at soliciting or accepting any personal advantage to/from employees of supplier companies in relation to company matters is prohibited.

Health and safety protection of suppliers and subcontractors

The Company is committed to spreading a culture of health and safety among suppliers and subcontractors with appropriate preventive actions of an organizational and technical nature. The Company ensures that the requirements of its contractors correspond over time to those required by the Company's procedures and qualification systems.

Confidentiality of information and intellectual property

In compliance with relevant regulations, The Company maintains strict confidentiality of strategic, confidential or intellectual property information of its suppliers from whom it expects the same behavior.

3.6 Consortia, ATIs, joint ventures, partnerships

Business partners are all those who, in various capacities (consortia, ATIs, joint ventures, partnerships), provide goods, services and resources, which are necessary for the implementation of activities and which contribute to determining the quality and efficiency of the final product offered to the customer.

Selection and evaluation of business partners

The process of selecting business partners is based on objective evaluations according to principles of fairness, quality, technical capability, cost-effectiveness, continuity, environmental protection, fairness, punctuality and ethicality and, where possible, through the enhancement of local partners.



Payments, gifts and benefits

The remuneration to be paid shall always be commensurate with the service specified in the contract, and payments may not be made to a person other than the counterparty or contractual party.

Selection of business partners

Business partners must accept all the rules of this Code.

3.7 Competitors

The Company adopts a business policy conducive to ensuring competitiveness in the marketplace, operating in compliance with applicable competition laws and regulations and prohibiting the adoption of unfair methods of competition.

3.8 Community and Environment

This includes all stakeholders whose interests are affected by the direct and indirect effects of the Company's activities.

Examples include, but are not limited to: the local community, the mass media, and the natural environment.

Economic and social context

The Company, with a view to improving the social context in which it operates, manifests its commitment to sensitive and relevant topics for the community, such as employment and culture.

In any communication with the outside world, information regarding The Company and its activities must be truthful, clear, and verifiable. In this regard, collaborators shall refrain from behaving or making statements that may in any way harm the image and interest of The Company.

Donations and liberalities

In any donations and granting of liberalities, the Company gives priority to initiatives that offer a guarantee of quality, that stand out for the ethical message conveyed, and that contribute to social development.



Environmental protection

Without prejudice to compliance with the specific applicable regulations, the Company takes appropriate measures to preserve the environment and the community, promoting the development of activities consistent with this objective and activating itself in internal initiatives to raise awareness.

When it promotes the design of new products such as paint or spray packaging, it carries out all necessary investigations to verify possible environmental risks arising and prevent them. The premise of the Company's environmental policy is expressed by the belief that the environment is a common good to be safeguarded. The Company is therefore committed to training its employees to be aware of the environmental aspects and impacts related to its activities and to reduce the effects of their actions.



MODALITY OF ACTUATION AND RESPECT OF CODE

We value every choice

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



4.1 Obligations of recipients

The Company's collaborators must observe and enforce the principles of this Code without distinction or exception, in Italy or abroad. In no way, acting for the benefit of the Company may justify the adoption of conduct contrary to the regulations and rules of conduct of the Code.

4.2 Disciplinary measures

Compliance with the principles of the Code must be considered an essential part of the contractual obligations towards the Company pursuant to and for the purposes of the regulations in force. It is the Company's commitment to enforce compliance with this Code also through the timely application of the sanctions provided for in the disciplinary system by the applicable CCNLs or by the reference contracts stipulated with the relevant counterparts.

4.3 Communication and training

The Code of Ethics is brought to the attention of all recipients by means of communication activities and its approval is formalized by sending it accompanied by the following sentence: *"This Code of Ethics will be deemed to be accepted in full by you if no comments are received by us within 10 days from the date of sending the document"*

This Code is available on the Company's website and is distributed to recipients in the manner, from time to time, deemed most appropriate for effective dissemination.

The Company, in order to strengthen the sharing of the Code of Ethics, consults with the relevant functions by stimulating appropriate training courses to clarify any aspect related to the application of the Code of Ethics.

4.4 Update

By resolution of the Board of Directors, the Code may be amended and supplemented, including on the basis of suggestions and indications from third parties.



4.5 Reports

Communications to Corporate Management (such as reporting an alleged violation, requesting clarification or advice) should be made preferably non-anonymously and may be sent by recipients and all other stakeholders, to the following references:

italgete@technima.com

EMAIL:

All'att.ne dell a DIREZIONE AZIENDALE

MAILING ADDRESS:

c/o ITAL G.E.T.E . Srl

Via Strada per Caselle, 16

20081 Morimondo (MI)

The Company is committed to protecting, from intimidation or retaliation, those who in good faith make reports of alleged or apparent violations of the Code, pursuing offenders with the disciplinary actions applicable from time to time.

Do you want to know more?

Do you need clarification?

Not sure how to interpret some of the
directions in the code of ethics?

Want to ask questions or report?



Email italgete@technima.com, or send
your request to the attention of the
Corporate Management.

www.italgete.it



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