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SCAMBIATORI - BOLLITORI - SERBATOI

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Code of Ethics and Business Conduct

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PREMISE AND PURPOSE OF THE CODE OF ETHICS

The Code of Ethics is an integral part of the corporate management and control model organisation.

It is the fundamental charter of moral rights and duties that defines the ethical and social responsibility of each member of the Pacetti S.r.l. (*hereinafter Pacetti*) company organisation and the concrete methods to be implemented in order to pursue and respect the principles that the company believes in and is inspired by in its daily operations.

The Code of Ethics is a voluntary instrument of self-regulation that defines the moral and social principles according to which Pacetti interacts with those who are directly or indirectly involved in the company's activities, i.e. customers, suppliers, partners, employees, collaborators, public institutions and anyone else involved in, in order to prevent irresponsible or possibly illegal behaviour.

Its recipients are called upon to strictly and fully comply with the values and principles it contains and are required to protect and preserve, through their behaviour, the respectability and image of Pacetti, as well as the integrity of its economic, social and human assets.

Compliance with the Code of Ethics is a choice of seriousness and corporate culture that Pacetti considers fundamental and essential in the exercise of its business activities and for the achievement of its economic, productive and social objectives.

ETHICAL AND SOCIAL STANDARDS AND PRINCIPLES

Pacetti has decided to adopt a Code of Business Ethics to transparently implement the compliance with models of behaviour inspired by integrity, ethics and fairness.

Respect for the law and moral values is not a mere rhetorical exercise, but Pacetti's actual being in society, through collective and individual behaviour.

The fundamental values on which the corporate activity is based are:

- integrity in compliance with laws and Regulations
- fairness and loyalty in relations with stakeholders
- transparency and business ethics
- equity, equality and rejection of any discrimination
- centrality, development and valorisation of human resources
- safety at work
- environmental protection
- sustainability
- diligence
- privacy
- honesty
- legality and combating crime

These principles, which define the corporate identity, are considered fundamental. All recipients are required to apply them correctly in both internal and external operations and relations.

These are the values taken into account in making strategic decisions and in relations with the whole stakeholders with whom Pacetti interacts, with the aim of achieving mutual benefit, demonstrating that ethics and business can coexist

COMPLIANCE WITH THE CODE OF ETHICS

BASIC RIGHTS

Pacetti carries out its activities with a full respect for the fundamental rights of each individual, protecting their moral integrity and ensuring equal opportunities. Internally, Pacetti wishes to maintain a clear working environment, where everyone can work in compliance with the law, principles and shared values. No form of isolation, exploitation or abuse is tolerated, for any kind of discrimination, for personal or work reasons.

COMPANY COMMITMENTS

Through the Code of Ethics, Pacetti, aware of its responsibilities, intends to formalise its commitment to conducting the company in a responsible manner and pursuing corporate objectives in compliance with the values of honesty, integrity, fairness, respect for rules and mutual cooperation.

More specifically, Pacetti undertakes to:

- ensure maximum spread of the Code of Ethics among employees and external collaborators
- provide any possible clarification on the interpretation and implementation of the rules of the Code of Ethics
- check every report of violation of the Code rules and, in the event of an established violation, adopt the appropriate disciplinary measures
- adopt all safety procedures and ensure that the physical and moral integrity of workers is guaranteed
- disseminate and consolidate a complete environmental culture and awareness, operating in compliance with the laws in force and adopting all available measures.

Pacetti's guiding principle stems from the desire to create, offer and maintain a healthy environment within the company. This implies coherence of the management and responsibility of the company in respecting the laws and rules of civil society, in combating crime, mafia or otherwise illegal activities, in maintaining relations inspired by fairness and integrity with the public administration and institutions.

EMPLOYEE DUTIES

Competence, honesty, dedication, loyalty, spirit of cooperation and mutual respect are required by all employees.

They shall refrain from any form of discrimination based on race, ethnic origin, language, gender, age, disability, sexual orientation and identity, religion, political membership

It is essential that the behaviour of the whole staff complies with the values of this Code of Ethics and sets an example for colleagues.

Relations between employees must be marked by fruitful cooperation and civil coexistence, promoting the development of a spirit of belonging to Pacetti and a motivated involvement in the company's activities.

Everyone has the same opportunities to express his or her professional potential, taking into account the aptitudes of each individual in the performance of assigned tasks.

SUPPLIER RELATIONS

In relations of sourcing and supplying goods and/or services, employees are obliged to obtain the cooperation of suppliers in constantly ensuring that the company's requirements in terms of quality, cost and delivery times are met. It is also necessary to observe and enforce contractual conditions and maintain an open and collaborative dialogue with suppliers, in line with good business practice.

Any risen up problems must be promptly brought to the attention of management.

CUSTOMER RELATIONS

The customer is the heart of the company's business and, therefore, all activities necessary to fulfil his expectations must be carried out. What is budgeted must be carried out in a complete, precise and punctual manner.

The solution provided to the customer must meet the characteristics of trustworthiness and safety, as established during the design phase. Employees are obliged to provide accurate and exhaustive information about the products and services offered, so that the customer can make conscious decisions.

More generally, correct, fair and transparent behaviour must be adopted towards customers, in full compliance with the company philosophy that considers them as its true assets.

RELATIONS WITH FINANCIAL INSTITUTIONS AND PUBLIC ADMINISTRATION

Relations with financial institutions and Public Administration are exclusively reserved for the company figures specifically delegated to do so and are agreed with them in advance. Employees without such a delegation may not provide information on behalf of the company without the necessary authorisation from the competent functions.

PROMOTION OF STANDARDS AND PRINCIPLES

RECIPIENTS OF THE CODE OF ETHICS

The pursuit of the targets set out with the adoption of the Code of Ethics sees the involvement of all those who work in the name and on behalf of Pacetti, who are required to strictly observe the defined rules of behaviour.

All Pacetti partners, under any title, are involved in the pursuit of the ethical goals set and are required to comply with the rules; any ethically incorrect behaviour may have negative reputational consequences for the company.

SPREAD AND KNOWLEDGE OF THE CODE OF ETHICS

Pacetti undertakes to simplify and promote the knowledge of the Code of Ethics by its recipients and to strictly supervise its observance, by setting up adequate information, prevention and control tools to ensure the transparency of the conduct brought into being.

BREACH OF THE CODE OF ETHICS

The violation of this Code of Ethics by all employees constitutes breach of contractual obligations and may lead to:

- for employees: the imposition of the sanctions and disciplinary measures provided for in the applicable Collective Agreement, including immediate suspension or resolution of employment.
- for collaborators: the immediate resolution of the business relationship and the pursuit of actions and measures, including the legal ones, depending on the damage suffered.

Some breaches of this Code may also be prosecuted civilly or penally by administrative or others authorities.