

Our principles are in our name.
The Eurodies Code of Ethics



Table of Contents

3	Letter from the CEO
5	Constraints and recipients Who is the Code of Ethics for?
7	Write, publish, share
9	The value of the person
11	How to behave at work
13	Respect for the environment
15	Confidentiality and IT security
16	The relationship with suppliers and customers
17	Administrative Management and Balance Corporate Governance: The Board of Directors
19	Corporate Governance: internal controls
21	Corporate Governance: Anticorruption, Anti-Money Laundering Policy
22	Policy of Whistleblowing, or reporting of offenses
23	How to report an offense
25	The mandatory nature of the Code of Ethics
26	Validity and updating of the Code of Ethics
30	Glossary



Dear Collaborators, Clients and Suppliers,

Eurodies has always considered ethics as the fundamental principle of business. We are a family business where each person knows all the others and is committed every day to solve and improve.

If technological innovation is the creative challenge of our business, safety, people's well-being and respect for the environment are the strength of our organizational model.

Every day we devote energy to improving our control system, to consolidate the principles of honesty, integrity and inclusion that guide our actions.

We have compiled our rules of conduct in this Code of Ethics, because what is written remains and represents a declaration of responsibility.

Ethics is the solid root to which we anchor ourselves in a changing present, and it is the compass that guides us in our choices.

These pages reflect the character of our company in respect of the human, environmental and technological capital that makes our daily challenge possible.

Vincenzo Rosati
CEO of Eurodies

A handwritten signature in blue ink, appearing to read 'V. Rosati'.



Article 1

Constraints and recipients

The regulations of the present Code address to anyone that relates to Eurodies, regardless of the title, by binding their conduct. Having said this, all the Recipients, listed in more detail in the following article, must know this Code, understand its meaning, actively work to deepen and/or clarify concepts that may be considered doubtful and conform their conduct, both commissive and omissive, to the content also expressed as well as to the underlying inspiring principles.

No action will be allowed and tolerated if it is inconsistent with the values and provisions of this Code, even if it is carried out in the interest or for the benefit of the Company. Violation of these obligations is a source of responsibility. The regulations of this Code take outweigh any opposing instruction and/or directive.

Article 2

Who is the Code of Ethics for?

The Recipients of the Code of Ethics are listed below:

- The corporate bodies, by whatever name, that are a part of the company's Governance structure;
- Company personnel, i.e. the workforce of any level and activity;
- Collaborators, regardless of the nature and type of contract;
- Consultants and suppliers of goods or services, including professional ones;
- Anyone who provides services in the name or on behalf of the Company;
- All third parties, including customers, who establish a relationship with the company;

The recipients, without exception, conform their conduct, in the context of their activities, roles and responsibilities, to the principles explained in this Code.

euro
come umanità
HUMANITY

Article 3

Write, publish, share

Eurodies disseminates this Code so that information delivery to all Recipients is guaranteed.

Eurodies will proceed with all the necessary communication activities, using all the means deemed appropriate, even with direct and individual communication if the intelligibility is not guaranteed by previous resources.

Eurodies promotes and guarantees the correct interpretation and correct application of the Code by providing all the necessary tools, appropriate assistance and implementing an adequate monitoring system and systematic information as well as training activities.



ur
come rispetto
RESPECT

Article 4

The value of the person

Eurodies is aware of the value of Human Resources and protects the Employee's physical and moral health, regardless of their roles and activities. Safety is inherent within the corporate culture, imposing awareness of the risks and promoting a responsible behavior by all employees and Collaborators.

The workforce is the recipient of systematic training to ensure the continuous development of professional and technical skills in line with the interests and attitudes of the individual.

Eurodies is an inclusive reality. Discrimination based on ethnicity, age, gender, state of health, religion, political/social/cultural identities is prohibited at all levels and in any kind of interactions.

Relationships must be based on mutual respect, loyalty and fairness, both regarding the role within the Company, but also taking under consideration the individual itself.



“Eurodies’ governance reflects the business principles that have shaped our history and paved the way for our company’s success: passion, technical expertise, ethics and valuing people.”

Vincenzo Rosati, CEO



Article 5

How to behave at work

The Recipients must act loyally and in good faith, with efficiency and fairness, basing their conduct on respect, mutual collaboration and in compliance with Eurodies procedures. All actions, operations and negotiations and, in general, the conduct carried out and to be carried out for a work activity, must be based on the principles of honesty, fairness, legality, integrity, transparency and mutual respect as well as being highly collaborative and transparent during audits, inspections, controls of any kind according to the current regulations.

All activities must be characterized by professional diligence that will be in line with the responsibility and the assigned role.

Knowledge and full implementation, within the scope of the performed activity, regulations, directives and procedures in the field of health and safety, privacy, environmental protection and quality are necessary.

The activity of each employee aims to improve their skills and their professionalism.

Business partners, Directors, Executives, Auditors, Employees and Collaborators of any nature must refrain from carrying out activities that are also potentially in conflict with the interests of Eurodies. To this end, those activities in which a direct or indirect personal interest may conflict with those of Eurodies or which are able to interfere with the ability to make decisions, in objective and impartial terms, in the interest of the Company itself, are excluded.

Article 6

Respect for the environment

Eurodies pays strong attention to sustainable development, carrying out actions that aim to reduce the environmental impact of its activities by

- promoting innovative industrial policies,
- increasing the use of renewable energy,
- optimizing the efficiency of the resources used,
- taking care of the daily life of its operations in terms of environmentally friendly
- developing its relationships with customers and suppliers who in turn have an equal environmental policy.



come onestà
HONESTY

d
come diversità
DIVERSITY

Article 7

Confidentiality and IT security

Eurodies protects the information and data of its Employees and third parties, by both avoiding and preventing any inappropriate use.

Each Recipient is required:

- to protect the discretion and confidentiality of the information obtained on the basis of their job position;
- to observe the confidentiality clauses requested by the Clients and other counterparties.

All the information, knowledge and data acquired by the Employees through their duties belong to Eurodies and cannot be used, communicated or disclosed without the prior and specific authorization.

Each employee is required to acquire and process only the data that is necessary and directly related to their activities; to store data in such a way as to prevent third parties from having access to data information; to communicate and disclose the data only if it is authorized by the interested party or if the legal basis of the processing exists, within the procedures and regulations established by Eurodies.

Eurodies guarantees the security management of information technology, protecting data and information from external interference with a risk management and information protection system, as well as company's assets, which all Recipients are required to respect and to promote its continuous development.

Article 8

The relationship with suppliers and customers

Eurodies builds its relationships with clients and suppliers on availability, respect, kindness in view of a relationship based on the collaboration and professionalism.

Duties, benefits (both direct and indirect), gifts, courtesy and/or hospitality acts are prohibited in the business relationships with clients and suppliers, unless their nature and value cannot comprise the image of the Company and if they are not aimed at obtaining a preferential treatment that is not established by the market rules.

Directors, Employees and Collaborators are required to guarantee the goods and services provided by Eurodies with quality, timeliness, efficiency and courtesy in compliance with the contractual obligations and expectations of the Client.

The choice of suppliers is ordered by the principles of correctness, transparency, objectivity, competence and economic efficiency. In any case, if more benefits than the ordinary commercial courtesy relationships are received, the Supervisory Body and the Manager must be notified and these will take on the proper corrections after the appropriate verifications.

The stipulation of a contract with the suppliers, as well as the management of the relative relationship, is inspired by the principle of clarity and fairness, routinely avoiding the excesses of mutual dependence.

Article 9

Administrative Management and Balance

Eurodies respects the principle of transparency, reliability and integrity of information relating to corporate accounting, when preparing the financial statements and any other type of accounting records, faithfully representing the facts and management activities according to the criteria of truthfulness and clarity.

Every action, operation and transaction must be legitimate, correctly registered, fully verifiable also in the motivations, congruous and confirmed by adequate documentary support. Recipients who become aware of omissions, falsifications or negligence are required to report the facts to the Supervisory Body.

Article 10

Corporate Governance: The Board of Directors

The Board of Directors of Eurodies acts and deliberates with weight, probity and knowledge of the facts, in order to pursue the interests of the entire Company in optimal terms.

The independence and objectivity of decisions is an essential requirement of the Board of Directors and, to this end, the members guarantee total transparency in the management of operations in which they have special interests, compliance with the law and corporate regulations.

The members of the Board of Directors must carry out their duties with professionalism, seriousness, loyalty, efficiency and overall vision, in the interest of corporate reality.

come integrità
INTEGRITY

Article 11

Corporate Governance: internal controls

Eurodies is equipped with an internal Quality and Control system aimed at promoting disclosure and verifying, as well as reporting, any improvements in corporate procedures, business operations and risk containment profiles.

All Recipients in the context of the functions and roles held within Eurodies are responsible for the implementation and compliance with the principles contained in the present Code of Ethics and, moreover, are required to actively collaborate in the control of the area of membership or tasks entrusted to ensure effectiveness and full manifestations.

“A company’s governance model reflects the social context in which it intends to operate: it reveals its compliance with the current legal standards as well as its willingness to foster the virtuous evolution of corporate life, in all its aspects.”

Marina Berrino,
Chairman of the Board of Directors

eS come eco-friendly
ECO-FRIENDLY

“Only the sharing of a common concept of legality makes it possible to strengthen the timeless ideas and values that spur the business community to continuous improvement.”

Vincenzo Rosati, CEO

Article 12

Corporate Governance: Anticorruption, Anti-Money Laundering Policy

Eurodies avoids any policy, attitude, active and / or omissive conduct aimed at obtaining undue favours from Political, Trade Union Organizations and other Movements or Committees of representation of a private or public nature.

Eurodies does not make contributions of any kind, neither directly nor indirectly, with the exception of those permitted by law and provided that they are always fully documented and respectful of the principle of transparency.

Eurodies complies with all anti-money laundering regulations and rejects any operation on which there is even the suspicion that it may be remunerated by money from illegal or criminal activities.
To this end, before undertaking co-operations or concluding contracts with third parties, the Management and Workers assigned to this function must ascertain the reputation of the potential contractor.

Article 13

Policy of Whistleblowing, or reporting of offenses

Eurodies does not compromise and condemn, from the outset, the use of law violations, behaviors lacking legitimacy, loyalty and correctness to achieve the objectives set since they are considered totally incompatible with the principles, quality, safety and sustainability that have always characterized the Company's activities.

Anyone who, during the performance of their activities and duties, or in any case in the context of relations with Eurodies, identifies or becomes aware - even indirectly - of a probable violation of the law, or even just a risk to violate the law, including the health and safety area, has the duty to report it to the Management and/or the Supervisory Body.

Eurodies ensure the confidentiality of the reporting person's identity*. Appropriate publication of the reporting methods provided both by computer and paper-traditional means is made, in order to make available to whistleblowers fully guaranteed confidentiality tools that allow to avoid any possible retaliation, discrimination or negative consequences of any nature.

** It guarantees full and concrete application of art. 6 paragraph 2-bis lett. a) - b) of Legislative Decree 231/2001, as supplemented by Law 179/2017,*

Article 14

How to report an offense

The reports referred in the previous article are received in a strictly confidential form and verified by the Supervisory Body.

The reporting system is regulated in a specific document having the same forms of publicity as this Code.

The procedure is defined in its content and object - including any violation of the law and conduct incompatible with the Code of Ethics, the Organizational Model, the Company Regulation and the regulations in force -, in the required methods and possible developments.

S

come sostenibilità

SUSTAINABILITY

Article 15

The mandatory nature of the Code of Ethics

This Code is mandatory in nature and must be understood as an integral part of the contractual obligations for all Members, Members of the Corporate Bodies, Employees and Collaborators*.

The violation of these principles and regulations constitutes a serious non-compliance which can be sanctioned at disciplinary level and with all legal consequences, also as compensation for damages.

In compliance with the principle of transparency and fairness, the Organizational Model and the Company Regulations exemplify and clarify the specific procedures and sanctions for violating the aforementioned rules. In any case, Eurodies reiterates that the relative nature of non-fulfillment of primary obligations of the employment relationship, implies that the conduct relevant to these purposes is considered a disciplinary offense and entails the adoption of proportionate measures in relation to the seriousness, the degree of fault and recidivism**.

The violation of the Code by third parties who have relationships with Eurodies, such as suppliers, consultants and collaborators of any nature, is qualified as a serious event capable of causing the termination of the contract, without prejudice to the right to compensation for damages and any other consequence both civil and criminal law.

* pursuant to and for the purposes of art. 2104 c.c.

** It is in compliance with the provisions of art. 7 of the Workers' Statute.

Article 16

Validity and updating of the Code of Ethics

The Code of Ethics is approved by the decision of the Company's Board of Directors and any update, modification and integration are also subject to resolution by the same corporate body, as well as its publication to ensure effective knowledge.





*Project coordination Cristina Nebbia
Graphic design and art direction Roberta Dri
Content curation and editing Donatella Cinzano
Photography Daniele Bottallo*

*Our thanks to the people at Eurodies who
collaborated on the photo shoot*

Glossary

To observe a rule, it is necessary to know and understand it. For this reason, the Eurodies Code of Ethics is written, as far as possible, in simple language, close to speech. For the more technical issues, however, the precision of the legal language is required, which sometimes uses less common terms.

We have drawn up this glossary with the aim of defining

1) the most important words that occur in the text

2) some technical terms that do not belong to everyday language

If there are further contents to be clarified, please contact the Supervisory Body at odv@eurodies.it to express their doubts and request explanations even on situations that are considered potentially critical.

Thanks for collaboration!

Agency

The set of people and assets that make up the Company. In this Code of Ethics it is also used as a synonym for Company.

Anticorruption

Anti-corruption policy.

Anti-Money Laundering Policy

Anti-money laundering policy.

Business assets

Company IT resources (e.g. servers, PCs, ..)

Collaborator

Any person who lends his business in the interest of Eurodies, internally

or externally to it, regardless of the contractual form, even in the form of consultancy, and anyone who has ongoing and daily relationships with the company.

Company regulation

The set of rules governing the company from a technical and disciplinary point of view, dictated by the owner of the company and mandatory for worker due to the conclusion of the employment contract.

Corporate bodies

Body with management or control functions and / or decision-making skills into which the company is divided.

Corporate Governance

Set of business rules aimed at correct and efficient management.

Discipline

Set of rules governing a specific activity or area.

Duties

Any form of delivery and attribution of goods and money.

Integrity

Honesty and righteousness.

Organisational model

Organization and management model pursuant to Legislative Decree 231/2001 which provides for an organization and a procedure to prevent the commission of certain crimes.

Principle of transparency

Principle aimed at guaranteeing clarity, correctness and preventing omissions or activities aimed at concealing relevant information.

Probity

Honesty, fairness, moral integrity, loyalty.

Quality system

System that includes procedures aimed at guaranteeing customer satisfaction and product quality, in full compliance with company principles and regulatory constraints.

Reference manager

The person you respond to in carrying out your daily business and from whom you are instructed.

Reporting procedure

Procedure envisaged to allow the reporting of significant offenses pursuant to Legislative Decree 231/2001.

Resolution

Official decision taken by a collegiate body or with a monochromatic composition.

Statute of Workers

Law n. 300/1970, containing "rules on the protection of the freedom and dignity of Workers, trade union freedom and trade union activity in the workplace and employment regulations".

Supervisory body

Body that monitors the liability of entities for crimes committed in the interest or for the benefit or in favor of the latter.

Whistleblowing

The reporting of risks, negligence, damage or offenses in the workplace by the Workers (whistleblower). An employee who reports a crime or an unlawful act of which he has become aware in the workplace cannot be discriminated against, sanctioned or fired and is therefore protected by specific company regulations and procedures.



Eurodies Italia S.r.l.
Legal and operational headquarters in
Viale dei Mareschi, 25
10051 Avigliana (Turin – Italy)
Direct +39 011 9572962

Supervisory Board
odv@eurodiesitalia.com

Approved by resolution of the Board of Administration of 01 March 2021