



S **STIMA** | **50** anni
Sul pezzo **dal 1965**

Code of Ethics

Foreword

The STIMA S.p.A. Code of Ethics identifies company values and states all the rights, duties and responsibilities of all those who work at STIMA S.p.A., in whatever capacity, with regard to all external interlocutors, such as employees, consultants, agents, commercial partners, public authorities, civil servants, shareholders and, more generally, all subjects linked to the company by a collaboration relationship.

This Code has been adopted to reflect the values of the Company whose primary objective is to satisfy as fully as possible the needs and expectations of the interlocutors of STIMA S.p.A.. The objective is to foster and promote a high standard of professionalism and to prohibit all conduct which is in conflict not only with such legal provisions that may apply, but also with the values which STIMA S.p.A. intends to foster.

STIMA S.p.A. undertakes to distribute the contents of this Code to all those who come into contact with the Company.

All those who work with the Company, without exception, are expected to comply with the Code of Ethics.



A – CORPORATE VALUES

- Safeguarding the individual
- Fairness and equality
- Ethically proper and legally compliant conduct
- Loyalty
- Confidentiality of information
- Respect of the interests of all parties
- Professionalism
- Protection of health and of the environment
- Respect of safety regulations

B – SIGNIFICANT AREAS

- Compliance with the law
- Professional duties
- Safeguarding of company interests
- Fair treatment
- Use and protection of corporate resources and information
- Integrity in relations with Public Authorities
- Competition
- Monitoring of activities based on safety regulations

The Code of Ethics applies to all company activities. STIMA S.p.A. makes the provisions of this Code known so that all those who have dealings with the company can know these company standards and understand their contents and purposes.

In so far as regards the identification of activities within which violations of the safety regulations may be committed, STIMA S.p.A. has adopted the measures contemplated concerning the health



and safety of workers with reference to:

- company structure suitable for the specific use (usability), conformity of systems, CE marking of equipment, periodic and scheduled maintenance, use of products / preparations / materials according to safety procedures after assessing chemical risks;
- work organisation: periodic training and information activity;
- health monitoring according to the health protocol envisaged by the Medical Officer;
- organisation of emergencies.

C – RULES AND STANDARDS OF CONDUCT

Guidelines in policies towards workers

Safeguarding dignity, health and safety in the workplace and respect of the protocols for preventing violations of the safety regulations.

STIMA S.p.A. is committed to offering equal employment opportunities without distinction based on ethnic group, religion, opinions, nationality, sex, physical conditions, age or social condition.

STIMA S.p.A. promotes and protects the health of its workers. STIMA S.p.A. promotes the technical and professional training of its workers.

To prevent violations of the safety regulations, the following Protocols are implemented by STIMA S.p.A.:

- regulatory obligations (yearly meeting art.11 Legislative Decree 626/94)
- management system based on procedures (SGSL) for small and medium industries; the management concerns the continuous checking and updating of the management system implemented by the entry into force of Legislative Decree 626/94 and subsequent amendments, taking into account all the integrations made, for example, since the introduction of new legal obligations.

Guidelines for workers

Compliance with the law

It is a mandatory requirement for the conduct of STIMA S.p.A. and of all its workers to comply with the law. Every worker must be aware of the legal repercussions of their actions.



The conduct of the workers of STIMA S.p.A. must not only comply with corporate policies, but must also be grounded on principles of co-operation, responsibility, professionalism and diligence.

Where the relationship between professional standards of diligence and the provisions of the law is not clear, common sense and good judgement shall prevail. Every worker shall seek and receive advice and information from their respective managers.

Duties and responsibilities

1 – Conflict of interests

The workers of STIMA S.p.A. are required to comply with this Code also in external relations. In particular, workers must adequately inform third parties of the contents of the provisions of the Code so that they can demand compliance.

The workers of STIMA S.p.A. must avoid situations that may create conflicts of interest, both real and potential, between their personal and their corporate activities. Transparency, trust and integrity are therefore values that must be respected at all times.

No employee of STIMA S.p.A. may procure personal advantages for themselves from activities carried out on behalf of STIMA S.p.A..

Should situations arise where there is a potential conflict of interest, communication between the worker and their superior is essential in order to remedy the matter.

2 – Corporate information: use and protection

The confidentiality of information is an asset that STIMA S.p.A. protects also by means of its workers: all information obtained by workers with regard to their activity is the property of STIMA S.p.A..

Personal data shall be processed in compliance with the regulations in force.

Workers who have access to information that is not in the public domain must use the greatest caution and care in using that information, ensuring that it is not disclosed to unauthorised persons, either inside or outside the company.

Confidential information means, purely by way of example: technical information relating to products and procedures; purchase plans; cost, pricing, marketing or service strategies; reports on income and other financial reports which are not made public;



information relating to sales and acquisitions.

Computer processing of information is subject to security controls needed to protect the company from unauthorised intrusion or unlawful use.

The distribution of hard copy or electronic media containing information must be conducted in compliance with the procedures that regulate the matter and in accordance with restrictions laid down by law.

3 – Accounting records, bookkeeping and corporate wrongdoing

All the actions and transactions performed by STIMA S.p.A. must be properly recorded and the decision-making, authorisation and execution processes must be verifiable.

All transactions must have sufficient supporting documentation to be able to perform checks at any time which provide evidence of the characteristics and reasons for the transaction and which identify the persons who authorised, performed, recorded and verified the transaction. Accounting entries must be kept accurately and they must be complete and prepared in a timely manner, in compliance with company bookkeeping regulations, in order to provide a faithful record of the finances and operations of the Company.

In order to achieve this, all employees involved in keeping accounts must co-operate fully in order to ensure that information is complete and clear and that data and documents are accurate.

Accounting entries means all documents that provide a numerical account of operations, including internal expense reimbursement notes.

It is expressly prohibited to prevent or hinder, either by concealing documents or by other means, the performance of control or auditing activities which are legally conferred on the corporate bodies.

It is also prohibited to report untrue facts, even if subject to estimate, concerning the operating, capital or financial position of STIMA S.p.A. to public regulatory authorities, in communications required by law, in order to hinder the performance of regulatory functions. Furthermore it is forbidden to conceal facts which should be reported by other fraudulent means. In no manner whatsoever may one deliberately hinder the functions of the public regulatory authorities.

4 – Relations with the public administration and with political and trade union organisations

Only functions authorised to do so shall have relations with public institutions.



In particular, all relations that involve company functions with public administration must be based on uniform principles of diligence, transparency and honesty.

The conduct of STIMA S.p.A. workers must be based on the utmost honesty and integrity in their relations with the employees and representatives of public authorities, political parties and trade unions.

Entertainment allowances and gifts to public employees and officials, providing they are of modest value, must comply with the general regulations of STIMA S.p.A. concerning expenses, in addition to complying with laws and regulations laid down by the public authorities concerned.

It is not, however, permitted to offer money or gifts to senior managers, officials or employees of public administrations or to their relatives, either in Italy or in other countries, unless these are gifts or benefits of modest value.

It is forbidden to offer or accept any object, service, or favour whatsoever having monetary value in order to obtain more favourable treatment with regard to business of any type whatsoever with public administrations.

If STIMA S.p.A. uses a consultant or a third-party to represent it in its dealings with public administrations, the same instructions given to STIMA S.p.A. employees also apply to such consultants or third parties.

5 – Relations with suppliers

The choice of suppliers and the purchase of goods and services are made by specific company functions on the basis of objective assessments of competitiveness, quality, value for money, price and integrity.

6 – Sanctions

All these rules form an integral part of the conditions that regulate employment relations: the rules set out in the Code of Ethics govern the conduct that employees are required to observe, by virtue of civil laws and criminal laws in force as well as obligations contemplated by collective labour agreements.

STIMA S.p.A. reserves the right to consider disciplinary action in the case of conduct contrary to the directives contained in this code.

D – CONTROLS

The internal control system must be designed to adopt instruments and methods to reduce potential risks to the company, in order to obtain reasonable guarantees of compliance not only with the law, but also with internal directives and regulations.

It is obligatory to inform the Supervisory Body charged with controlling the operation and observation of the Code of Ethics, considering also the safety regulations. The reference body is the company Prevention and Protection Service, regularly constituted and appointed by STIMA S.p.A.; the service performs the tasks contemplated by art. 9 of Legislative Decree 626/94 and subsequent amendments and integrations.

The obligation of information coincides with the periodic meeting on safety, art. 11 of Legislative Decree 626/94.

The minutes of the meeting are drawn up in writing and signed by all the members of the company prevention and protection service.

Corporate training programmes fall within this framework and must cover the contents of the Code of Ethics, which is made available to all company workers.

Management must constantly ensure that conduct complies with the contents of the Code and, if necessary, it must implement special monitoring programmes.

The bodies charged with verifying the efficiency of the internal control system are:

the Board of Directors, the Chairman, the Vice-Chairman.



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