



**S. CATERINA** s.r.l.



# *Code of Ethics*

*IO PER 01 - Rev.1 of 21/05/2024*

In carrying out its activities, Santa Caterina s.r.l. assumes as its guiding principles the respect of the law and regulations of the countries in which it operates, in accordance with the principles of legality, fairness, transparency, confidentiality and respect for the dignity of the person.

## **RECIPIENTS**

The Code of Ethics is addressed to all those who establish relationships, stable or temporary, with Santa Caterina s.r.l.

Recipients who violate the principles and rules contained in this Code damage the relationship of trust established with the Company. All recipients are required to be familiar with the Code of Ethics, to contribute to its implementation, improvement and dissemination.

The Company undertakes to distribute a copy of this Code to all employees, suppliers and collaborators and to disseminate its contents and objectives.

## **OBJECTIVE**

This Code of Conduct has been developed to ensure that the Company's ethical values are clearly defined and form the basic element of the corporate culture, as well as the standard of conduct of all the Company's employees, in the conduct of the Company's activities and business.

Santa Caterina s.r.l. operates in compliance with the law and strives to ensure that all staff act in this sense, people must behave in accordance with the law, in any context and/or activity carried out.

This commitment must also apply to consultants, suppliers, customers and anyone who has relations with the company.

Each director, employee, collaborator, who has an employment relationship with Santa Caterina s.r.l. is required to operate with loyalty, diligence, fairness, assuming responsibility for his or her own work, must abstain from conduct that are not in line with the provisions of the Code and report any violation of the Code as soon as possible.

It must also undertake to comply with the laws and regulations of all the countries in which it operates in the name and on behalf of Santa Caterina s.r.l.

## **GENERAL ETHICAL PRINCIPLES**

The entrepreneurial activity of the company Santa Caterina s.r.l. is carried out in compliance with the fundamental principles of fairness in relations with employees, with other companies, with the market, with public authorities, according to principles of transparency and search for the common good, far from taking advantage where ethically incorrect behavior reigns, represented by the practice of corruption and illegality.

That being said, Santa Caterina s.r.l. has as an essential principle the respect of laws and regulations, the respect of transparency understood as clarity, completeness and relevance of the information, the respect of the confidentiality of the information known for use exclusively in the workplace and not to disclose sensitive information without the explicit consent of the interested parties; respect for fundamental human rights, protecting their moral integrity and guaranteeing equal opportunities.



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## **DISCRIMINATION**

Santa Caterina s.r.l. offers a welcoming environment to all staff members, customers, volunteers, subcontractors and suppliers, operating without any kind of discrimination on the basis of race, colour, religion or belief, sex or gender expression, age, national origin or ancestry, physical or mental disability, marital status, sexual orientation and/or social status.

In accordance with applicable law, any investigation into opinions, preferences, personal tastes and, in general, the private life of the Recipients is prohibited.

Workers must be treated equally and rigorously assessed on the basis of their skills and qualifications.

At the same time, Santa Caterina s.r.l. promotes integration, promoting intercultural dialogue and the protection of the rights of minorities and also guarantees the right to protection from any act or conduct that produces a detrimental effect or that discriminates, even indirectly, against workers.

## **HARASSMENT AT WORK**

Santa Caterina s.r.l., referring to Recommendation 92/131 CEE on the protection of the dignity of women and men at work, guarantees to all those who work for the company an environment in which interpersonal relationships are based on fairness, equality and mutual respect for the freedom and dignity of the person.

Santa Caterina s.r.l. condemns any unwanted behavior or in the form of harassment, whether sexually based, social or racial discrimination, which harms the dignity of the person, both inside and outside the workplace.

## **CHILD LABOUR**

Santa Caterina s.r.l. undertakes not to use child labour under any circumstances, in accordance with the provisions of the International Labour Organization (ILO) Conventions.

The Company respects the importance of human rights around the world, in particular the prohibition of harassment, bullying, discrimination, use of child or forced labor, and human trafficking for any purpose.

## **PRIVACY**

Santa Caterina s.r.l. is sensitive to the privacy of the Stakeholders of this code and has adopted appropriate precautions and security measures regarding the processing of personal data. Santa Caterina s.r.l. undertakes to ensure the protection and confidentiality of the data collected in compliance with all applicable legislation on the protection of personal data and in accordance with European Regulation 679/2016.

It is forbidden, except in the cases provided for by law, to communicate/disseminate personal data without the prior consent of the interested party and without compliance with EU Reg. 679/2016.

## **INTELLECTUAL PROPERTY**

Santa Caterina safeguards its intellectual property rights, including trademarks and identifying marks, by adhering to the policies and procedures established for their protection and also respecting the intellectual property of others. Own intellectual property rights and not to use goods and utilities protected by the rights of others. Santa Caterina does not violate license agreements for the intellectual property rights of others and does not make unauthorized use of them.

In particular, by way of example but not limited to, it is prohibited to:

- counterfeit, alter or use trademarks or distinctive signs or patents, models and designs owned by third parties;
- introduce into the State and/or market products with false or misleading signs;



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- manufacture and market goods created by usurping industrial property rights;
- disseminate, without authorization, intellectual works - or parts of them - protected by copyright.

### **CONFIDENTIALITY**

Each employee or collaborator is required not to use confidential information, learned as a result of his or her work activity, for purposes unrelated to the exercise of this activity, and in any case to always act in compliance with the confidentiality obligations assumed by Santa Caterina s.r.l.

In particular, the Recipients are required to maintain the strictest confidentiality on documents suitable for disclosing transport information, commercial information, accounting information, corporate operations and production information.

The following are considered confidential information:

- projects and investments;
- data relating to staff, customers and suppliers, users;
- commercial contracts;
- business documents;
- the production process;
- databases relating to suppliers, customers, employees and external collaborators;

In particular, employees must:

- keep confidential the news and information learned in the exercise of their duties;
- observe the duty of confidentiality even after termination of service;
- consult only the documents to which they are authorized to access, using them in accordance with their duties
- prevent the possible dispersion of data by observing the security measures given, keeping the documents entrusted to them in an orderly and careful manner and avoiding making unnecessary copies.

### **ACCOUNTING AND FINANCIAL STATEMENTS**

Santa Caterina s.r.l. respects:

- accounting standards;
- international and local laws and regulations; and
- general ledger standards and controls.

The preparation of the financial statements and any other type of accounting documentation is carried out in compliance with the laws and regulations in force, adopting accounting practices and principles according to criteria of clarity, truthfulness and correctness.

### **COMPLIANCE WITH COMPETITION LAW**

The company will always ensure, to the extent possible, that competition in any market in which it operates is fair, free and unlimited, complying with all competition laws and regulations applicable to its activities or business.

### **CORRUPTION**

Santa Caterina s.r.l. will conduct its business in a fair and legal manner.

It is forbidden to accept promises of favours, personal privileges, offers of money and favours of any kind, in order to favour third parties towards Santa Caterina s.r.l.

### **FAIRNESS AND LOYALTY**



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Santa Caterina s.r.l. is committed to fair competition, in compliance with the law, and in the awareness that virtuous competition is a healthy incentive for innovation and development processes.

It is not permitted to pursue one's own interests to the detriment of the company's interests, nor to make unauthorized personal use of company assets, nor to hold interests directly or indirectly in competing companies, customers or suppliers.

### **INCENTIVE PAYMENTS**

Santa Caterina s.r.l. will conduct its business in a fair and legal manner, for this reason it will not make any type of incentive payment and will not allow incentive payments for its benefit.

### **CHOICE OF SUPPLIERS AND CUSTOMER MANAGEMENT**

Santa Caterina s.r.l. will conduct its business in a fair manner and will not grant any advantage that could unduly influence the representative of a supplier or a customer in relations with the company.

Only suppliers are used who guarantee respect for the person and do not use child labour, in accordance with the Conventions of the International Labour Organization (ILO). The selection of suppliers and the determination of purchasing conditions are based on an objective assessment of the quality and price of the good or service.

Behaviour by suppliers or customers contrary to the principles expressed in the Code may represent a serious breach of the duties of fairness and good faith in the execution of the contract, as well as a reason for damage to the relationship of trust and just cause for the termination of contractual relations.

### **CONFLICTS OF INTEREST**

Santa Caterina s.r.l. will ensure that business decisions are made in the best interest and will not accept that an employee uses his or her position within the organization for personal gain or in the interest of others and not the company.

### **DONATIONS TO POLITICAL PARTIES**

Caterina s.r.l. has a clear objective that it is independent of party policies; therefore, it does not support or make donations to any political party or candidate.

### **HEALTH & SAFETY**

All employees must comply with internal rules and procedures on risk prevention and health and safety protection and promptly report any deficiencies or non-compliance with current regulations.

Santa Caterina s.r.l. provides information and training, in accordance with the provisions of the law, with regard in particular to the conduct to be adopted on the subject of safety at work, in order to avoid dangers, assess them and combat risks at source.

### **ENVIRONMENT**

Santa Caterina s.r.l. is aware that the protection of the environment must be continuously improved, that said, it undertakes to apply and comply with current regulations on environmental protection and environmental management, according to the ISO 14001 standard.

### **EMPLOYEE RELATIONS**

#### **Pay**

Santa Caterina s.r.l. guarantees the correct application of the remuneration regulations established by the National Contract in Force and supervises the correct application of increases, indemnities and any other emolument due to the worker.



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### **Working Hours**

Santa Caterina s.r.l. adopts a weekly working time of 40 ordinary hours.

Santa Caterina s.r.l. undertakes not to exceed the overtime hours established by the national collective agreement.

### **DIFFUSION**

Santa Caterina s.r.l. undertakes to disseminate the Code of Ethics, using all means of communication and opportunities available, such as, for example, specific communications, IT or staff information and training meetings. All interested parties must be able to access the Code of Ethics, know its contents and observe its provisions.

### **RESPECT**

Compliance with the Code of Ethics is to be considered an integral part of the contractual obligations, pursuant to Article 2104 of the Civil Code for employees, as well as for collaborators.

The effects of violations of the Code of Ethics and internal protocols must be taken into account by all those who, for any reason, have relations with Santa Caterina s.r.l.

Depending on the seriousness of the conduct carried out by the person involved in one of the illegal activities provided for by the Code, Santa Caterina s.r.l. will take the appropriate measures without delay.

Failure to comply with the Code by the employee may give rise, in accordance with the procedures provided for in art. 7 of the Workers' Statute, to disciplinary measures.

Without prejudice to the above, conduct by the employee in violation of the Code of Ethics is punished with appropriate disciplinary measures in accordance with the provisions of the current CCNL:

- (a) verbal reprimand;
- (b) a written reprimand;
- (c) a fine not exceeding three hours total pay (basic pay and contingency);
- (d) suspension from service and pay for a period not exceeding 3 days;
- (e) dismissal.

The identification and application of penalties will always take into account the general principles of proportionality and appropriateness in relation to the alleged infringement.

### **SUPERVISION OF THE IMPLEMENTATION OF THE CODE OF ETHICS**

The task of verifying the implementation and application of the Code of Ethics is the responsibility of the Management Staff. Compliance with the provisions of this Code is also entrusted to the prudent, reasonable and careful supervision of each of the Recipients, within the scope of their respective roles and functions within the company.

### **CONCLUSION**

The entire company, including customers and suppliers, must adhere to these principles in all the activities that are carried out, in particular when decisions have to be made or choices made.