

**BARBIERI SAS**

**CODE OF ETHICS**

*This code of ethics has been approved by the administrative office of BARBIERI SAS*

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## **INTRODUCTION**

### ***THE MISSION of Barbieri SAS***

Barbieri Sas is aware that the authority of a company is recognized, in addition to the competence of its employees and the high quality of the service provided to customers, also by the attention to the needs of the whole community.

The principles that have always inspired the work of this company are formally collected in a Code of Ethics and of Conduct in the belief that reliability is built daily by respecting standards and appreciating people.

Therefore, this Code of Ethics represents a distinctive and identifying element towards the market and third parties, of which the knowledge and sharing, required by all those who work in the Company or who collaborate with it, constitute the foundation of our activity and the first step to contribute to the pursuit of our *mission*.

### ***PURPOSE AND RECIPIENTS***

This Code of Ethics (hereinafter, the "**Code** ") illustrates the set of ethical and moral principles that are the basis of our activity and the lines of conduct adopted by the Company both within (in relations between employees) and outside (in relations with the institutions, suppliers, customers, business *partners*, political and trade union organizations and the media).

The respect of these principles is of fundamental importance in order to achieve our company mission and to guarantee its reputation in the socio-economic context in which it operates.

This Code is binding for managers and employees, as well as for all those who work and cooperate, permanently or in a fixed-term basis, on behalf of the Company.

The Code will be widely disseminated within the internal structure, and widely communicated to the outside, also through its own website.

Barbieri also agrees to adopt any further provision so that the principles and requirements of the Code can be duly disclosed and applied.

## **1 GENERAL PRINCIPLES**

The conduct of the Recipients, at all levels of business, is based on the principles of legality, fairness, non-discrimination, confidentiality, diligence, and loyalty.

### **1.1 Legality**

Barbieri Sas operates in absolute compliance with the law and this Code.

All Recipients are therefore required to comply with all applicable regulations and to constantly update themselves on legislative developments, also taking advantage of the training opportunities offered by Barbieri sas.

The Company considers the transparency of the financial statements and accounting a fundamental principle for the exercise of its business and for the protection of its reputation.

### **1.2 Fairness**

Fairness and moral integrity are an indefectible duty for all Recipients.

The Recipients are required not to establish any privileged relationship with third parties, which is the result of external solicitations aimed at obtaining improper benefits.

In carrying out their activities, Recipients are required not to accept donations, favours or utilities of any kind (except for objects of a modest value, e.g. gadgets) and, in general, not to accept any compensation in order to grant benefits to third parties in an improper manner.

In turn, Recipients must not make donations in cash or goods to third parties or otherwise offer unlawful benefits or favours of any kind (except for items of modest value or commercial courtesy gifts authorized by the Company) in connection with their activity for the benefit of Barbieri Sas.

The intrinsic belief of acting in the interests of the Company does not exonerate the Recipients from the obligation to comply with the rules and principles of this Code.

### **1.3 Non-Discrimination**

Barbieri sas avoids and repudiates any discrimination concerning the age, sex, race, sexual orientation, state of health, political and trade union opinions, religion, culture and nationality of its interlocutors.

Barbieri sas, at the same time, favours integration by promoting intercultural dialogue, protecting the rights of minorities and weak subjects.

### **1.4 Confidentiality**

Barbieri sas agrees to ensure the protection and confidentiality of the personal data of the Recipients and of the Stakeholders, in compliance with all applicable laws regarding the protection of personal data.

The Recipients are required not to use confidential information, learned through their work, for purposes unrelated to the exercise of such activity, and in any case to act always in compliance with the confidentiality obligations assumed by Barbieri sas towards everyone.

In particular, the Recipients are subject to the strictest confidentiality on documents capable of revealing know-how, transport information, commercial information and corporate operations.

### **1.5 Diligence**

The relationship between Barbieri sas and its employees is based on mutual trust: the employees are therefore required to work to promote the interests of the Company, in accordance with the values set out in this Code.

Recipients must refrain from any activity that may constitute conflict with the interests of Barbieri sas, renouncing the pursuit of personal interests in conflict with the legitimate interests of the Company.

In cases where the possibility of existence of a conflict of interest can be represented, the Recipients are required to consult, without delay, their managers so that the company can assess, and where necessary authorize the potentially conflicting activity.

In cases of violation, the Company will adopt all appropriate measures to terminate the conflict of interest, reserving the right to act in its own protection.

### **1.6 Loyalty**

Barbieri sas and the Recipients undertake to achieve fair competition, in compliance with National and Community Legislation, in the knowledge that virtuous competition constitutes a healthy incentive for innovation and development processes, in addition to protecting the interests of consumers and the community.

## **2 RELATIONSHIPS WITH EMPLOYEES AND WITH COLLABORATORS**

### **2.1 Staff recruitment**

The assessment and selection of staff are carried out according to fairness and transparency, respecting equal opportunities in order to combine the needs of Barbieri sas, with the professional profiles, ambitions and expectations of the candidates.

Barbieri sas undertakes to adopt any measure useful to avoid any form of favouritism in the process of selecting the staff using objective and meritocratic criteria, respecting the dignity of the candidates and in the interest to the good performance of the company.

Staff employed shall receive clear and correct information about the roles, responsibilities, rights and duties of the parties, also through the implementation of this Code.

### **2.2 Staff management**

Barbieri sas values and develops its human resources, committing itself to maintaining constant the conditions necessary for the professional growth, knowledge and skills of each person, carrying out the appropriate training for professional development and any initiative aimed at pursuing that purpose.

Barbieri sas promotes the participation of workers in the company life, providing participatory tools able to collect the opinion and suggestions of the workers, ensuring their best possible participation.

Without prejudice to the Company's maximum availability, no employee may be obliged to perform duties, performance or favours not due on the basis of their work contract and their role within the company.

The Company is firmly committed to combating *harassment*, *stalking*, psychological violence and any behaviours that is discriminatory or offensive to the dignity of the person inside and outside the company premises.

Relations between employees must be carried out with loyalty, fairness and mutual respect, in compliance with the values of civil coexistence and the freedom of people.

## **3 WORKING ENVIRONMENT**

Barbieri sas is committed to offering its staff a healthy working environment, safe and respectful of the dignity of workers.

Safety in the workplace is ensured both by rigorously implementing the provisions of the applicable law, and by actively promoting the culture of safety through specific training programmes. Staff training is a central element of the management system adopted.

Barbieri sas protects the health of its workers, also ensuring compliance with hygiene and health standards.

## **4 MANAGEMENT OF THE COMPANY**

### **4.1 Compliance with internal procedures**

Barbieri sas believes that management efficiency and the culture of control are essential elements for the achievement of the objectives.

The Recipients are required to strictly comply with the procedures and instructions inside the company.

The Recipients must act in accordance with their respective authorization profiles and must retain all relevant documentation to keep track of activities undertaken on behalf of the company.

### **4.2 Accounting management**

In the accounting management activity, the Recipients are called to act in compliance with the principles of truthfulness, accuracy and transparency, so as to protect the reputation of Barbieri sas both internally and externally.

Compliance with these principles also allows the company to plan its operational strategies based on its real economic and financial situation.

All entries in the accounts must therefore be supported by complete, clear and valid documentation, avoiding any form of omission, falsification and/or irregularity.

In the case of financial assets based on assessments and estimates, the relevant registration must be based on criteria of reasonableness and prudence.

### **4.3 Protection of company assets**

Recipients exercise their duties by trying to rationalize and contain the use of company resources.

Recipients are required to properly enforce security provisions to protect *hardware* devices from unauthorized access, which could seriously harm the personal data protection rights of the staff and customers of Barbieri sas.

### **4.4 Communication**

Barbieri sas provides suitable communication tools through which to interact with the company to forward requests, ask for clarification or make complaints.

Barbieri sas promotes effective company communication able to put the company in contact with the civil society, in order to acknowledge requests, demands and necessities of the community and to spread its values and mission.

The information disseminated is complete and accurate, allowing recipients to make correct and informed decisions.

## **5 RELATIONS WITH THE OUTSIDE**

### **5.1 Relations with Authorities and the Public Administration**

Relations with the Authorities and the Public Administration must be based on the utmost clarity, transparency and collaboration, in full compliance with the law and according to the highest moral and professional *standards*.

The recipients, unless expressly authorized, may not relate with the Authorities and the Public Administration in the name and on behalf of Barbieri sas.

In relations with Public Officials, Public Service Officers, and the Public Administration in general, the authorized Recipients will adhere to maximum levels of fairness and integrity, abstaining from any form of pressure, express or veiled, aimed at obtaining any undue advantage for himself or for Barbieri sas.

In this regard, the authorized Recipients shall be required to strictly comply with the provisions of this Code and, more generally, to what is laid down in the directives issued by the management of Barbieri sas.

### **5.2 Relations with customers and suppliers**

Recipients relate to third parties with courtesy, competence and professionalism, believing that their conduct depends on the protection of the image and reputation of the company and consequently the achievement of business objectives.

In particular, Recipients must refrain from any form of unfair or misleading behaviour that may induce customers or suppliers to rely on unfounded facts or circumstances.

Recipients are required to work consistently to offer punctual and high-quality services to customers, seeking to limit any form of disservice or delay in order to maximize customer satisfaction.

Relations with suppliers are based on loyalty, fairness and transparency.

The choice of suppliers is made on the basis of objective criteria of economic return, opportunity and efficiency.

The choice of suppliers on purely subjective and personal grounds or, in any case, by virtue of interests conflicting with those of companies, is precluded.

Recipients must make every possible control so that even suppliers and customers are able to comply with the basic ethical principles referred to in this Code.

## **6 INTERNAL CONTROL SYSTEM**



Compliance with the requirements of this Code is entrusted to the prudent, reasonable and attentive supervision of each of the Recipients in the context of their respective roles and functions within the company.

All Recipients are invited to report to their superiors facts and circumstances potentially in contrast with the principles and requirements of this Code.

## **7 SANCTIONS SYSTEM GUIDELINES**

The internal control system is oriented towards the adoption of tools and methodologies aimed at counteracting the potential business risks, in order to guarantee compliance not only with the laws, but also with the internal provisions and procedures.

In fact, the violation of the principles set forth in the Code and the procedures established in the internal controls compromises the relationship of trust between the Company and its directors, employees, consultants, collaborators in varied capacity, customers, suppliers, commercial and financial *partners*.

These violations will therefore be immediately prosecuted by Barbieri sas in an incisive and timely manner, with the adoption of adequate and proportionate disciplinary measures.

The repercussions of violations of the Code of Ethics and internal protocols must be taken into consideration by all those who, in any way, have relations with Barbieri sas. Depending on the severity of the conduct committed by the person involved in one of the illegal activities provided for in the Code, Barbieri sas will immediately take the appropriate measures, regardless of the possible exercise of the prosecution by the judicial authority.

Without prejudice to the foregoing, conduct in violation of the Code of Ethics constitutes:

- serious breach of contract for employees (workers, employees, managers and executives), with penalties, applied depending on the severity, provided for by the NATIONAL COLLECTIVE LABOUR AGREEMENT (verbal reprimand, written reprimand, fine not exceeding three hours of pay, suspension from work and from pay up to a maximum of three working days, dismissal for just cause or justified reason); in the event of a prosecution or the execution of a restrictive measure of personal freedom assumed against the employee, before the disciplinary measure is taken, the sanction of the suspension from service and pay may be adopted, for the duration corresponding to the outcome of the criminal proceeding or until the end of the duration of the restrictive measure of personal freedom;
- cause of immediate resolution of the relationship, in the most serious cases, for external and freelance collaborators;
- cause of immediate resolution of the relationship, in the most serious cases, for suppliers.

The identification and enforcement of the sanctions will always take into account the general principles of proportionality and adequacy with respect to the alleged violation.

In all the aforementioned assumptions, Barbieri sas also reserves the right to exercise all the actions that it deems appropriate for the compensation of the damage suffered as a result of the behaviour in violation of the Code of Ethics.