



**casagrande**

# CODE OF ETHICS

*Management and Control Organisational Model pursuant to (It.)  
Legislative Decree 231/01*



**Casagrande S.p.a.**

*Via Arturo Malignani, 1  
33074 Fontanafredda (PN)*



## CODE OF ETHICS

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Issued by the Company Contact for 231

Mr Marco Dell'Utri

Signature: \_\_\_\_\_

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Checked by the General Manager

Mr Simone Casagrande

Signature: \_\_\_\_\_

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Approved by the Chairman of the Board of Directors

Mr Sergio Casagrande

Signature: \_\_\_\_\_

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## **INTRODUCTION**

**CASAGRANDE S.p.a.** (hereinafter **CASAGRANDE**) undertakes to observe the highest standards of ethics and fairness in business conduct. This “Code of Ethics and Company Conduct” (hereinafter referred to as the “Code”) reflects the commercial practices and self-regulatory principles underlying this commitment.

This Code expresses the commitments and ethical responsibilities in the conduct of business and corporate activities and defines the set of values and principles, as well as the lines of behaviour that must be taken by the “Directors” of **CASAGRANDE**, by all persons involved in working relations with the Company (“Employees”), and by all those who work for the Company, regardless of the relations between them (“Collaborators”).

On the other hand, the Italian national legal system now recognises the legal relevance and purpose of precluding liability of the adoption of ethical principles and corporate conduct, following the entry into force of (It.) Legislative Decree no. 231/2001 (“Decree”) as amended (“Rules governing the administrative liability of legal persons, Companies and associations, including those without legal personality”).

The adoption of and compliance with the Code - which is part of a broader Internal Management and Control Organisational Model - can protect the Company from liability; in this case, it would be safe from the sanctions provided for in the Decree.

The Code is therefore complementary to existing internal procedures aimed, directly or indirectly, at reducing the risk of the commission of offences pursuant to (It.) Legislative Decree 231/2001 and takes into account the suggestions included in the specific Guidelines issued by Confindustria [the General Confederation of Italian Industry] (approved by the Ministry of Justice on 2 April 2014).

Compliance with the provisions contained therein is to be considered an integral part of the contractual obligations assumed by **CASAGRANDE** personnel, also pursuant to and for the effects of art. 2104 of the (It.) Civil Code.

The violation of the rules of the Code may therefore constitute a serious breach of the obligations deriving from the work contract and a source of civil tort, with all consequent personal liability.

Similarly, the Company reserves the right to protect its interests before any competent courts towards third-party collaborators (suppliers, agents, consultants and commercial partners) who have breached the provisions of this Code intended for them and which have formed the object of contractual agreements with **CASAGRANDE**.

In order to give the widest possible divulgation of its content, this Code of Ethics is also published on the company website [www.casagrandegroup.com](http://www.casagrandegroup.com).

The Code of Ethics also forms the primary basis for the Organisational Model, adopted by the Company pursuant to the provisions of (It.) Legislative Decree 231/2001 (administrative liability of entities for actions constituting offences), of which it is an integral part (the breach of the principles and rules contained therein can therefore have serious consequences for the Company also pursuant to said legislation).

## 1. General principles

### 1.1 *Recipients*

“Recipients” are those persons to whom the rules of this Code of Ethics apply, identified as the Directors and members of the corporate bodies, all employees of the Company and all those who, directly or indirectly, permanently or temporarily, establish relations with **CASAGRANDE**, or, in any case, work to pursue the company’s goals and objectives, in all the Countries where **CASAGRANDE** operates.

The activity carried out by **CASAGRANDE** is aligned with the principles of fairness and transparency. To this end, the operations between the various corporate subjects respect criteria of substantial and procedural fairness, according to pre-established principles of behaviour for their execution, adequately brought to the knowledge of the market.

The members of the Boards of Directors, in setting company goals, are inspired by the principles contained in the Code.

First and foremost, managers are responsible for giving substance to the values and principles contained in the Code, taking responsibility internally and externally and strengthening trust, cohesion, the sense of belonging and the spirit of **CASAGRANDE**.

In the context of due respect of the law and of the regulations in force, the employees of **CASAGRANDE** adapt their actions and their behaviour to the principles, objectives and commitments provided for by this Code.

All actions, operations and negotiations carried out and, in general, the behaviours put in place by the employees of the Company in carrying out the working activity are inspired by maximum fairness from the management point of view, completeness and transparency of information, legitimacy from a formal and substantial point of view, and clarity and truth in the accounting findings in accordance with the laws in force and the internal procedures.

Each employee must provide work contributions that fit with the responsibilities assigned and the recognised professionalism, and must act in such a way as to protect the prestige and image of **CASAGRANDE**.

Each Recipient is required to know the Code of Ethics, to actively contribute to its implementation and to report any shortcomings to the authorised department of reference (Management, Human Resources Department, Supervisory Body).

In order to fully comply with the Code of Ethics, each employee, if he/she becomes aware of situations that actually or potentially can represent a significant breach of the Code of Ethics, must promptly report such situations to his/her direct superior and to one of the reference Bodies referred to in point 1.6.

### 1.2 *CASAGRANDE Commitments*

**CASAGRANDE** also ensures through the designation of specific functions (“Reference bodies”):

- 1) the maximum dissemination of the Code to the Recipients;
- 2) updating the Code in order to adapt it to the development of civil awareness and regulations relevant to the Code itself;

- 3) the carrying out of verifications with reference to every reported breach of the rules of the Code;
- 4) the evaluation of the facts and the consequent implementation, in case of an ascertained breach, of adequate sanctions;
- 5) that no one can be subjected to retaliation of any kind for having provided information on possible breaches of the Code or of the reference standards.

### **1.3 Obligations for all employees**

Each employee is required to know the rules contained in the Code and the reference standards that govern the activity carried out in the context of his/her function. **CASAGRANDE** employees are required to:

- 1) refrain from behaviour contrary to such standards;
- 2) contact their superiors or the Human Resources department if they require clarifications on how to apply them;
- 3) promptly report to their superiors or to the Human Resources department any information, directly detected or reported by others, regarding possible breaches thereof, as well as any request made to them in order to breach them or evade them;
- 4) in cases of alleged breaches of particular severity, the employee is obliged to report directly to Management.

### **1.4 Additional obligations for the Heads of the corporate Units and Departments**

Heads of Corporate Unit/Department are required to:

- 1) provide a behaviour model for their collaborators, in order to have them comply with the Code and the reference procedures;
- 2) operate in such a way that collaborators understand that compliance with the requirements of the Code, as well as the procedures and safety regulations, constitute an essential part of work performance quality and of the work relationship in its ethical dimension;
- 3) recruit employees and select internal and external collaborators, in so far as this is their responsibility, in such a way as to ensure that work is not given to anyone not fully committed to observing the rules stated in the Code and the procedures;
- 4) adopt immediate corrective measures when required by the situation.

### **1.5 Validity of the Code towards third parties**

All **CASAGRANDE** employees, according to their skills, in their relations with external parties must:

- 1) adequately inform them about the commitments and obligations imposed by the Code;
- 2) demand compliance with the obligations that directly affect their activity;
- 3) adopt appropriate internal and, if authorised, external initiatives, in the event of third parties not conforming to the rules stated in the Code.

### 1.6 *Reference bodies*

The reference bodies for the application of the Code are:

the Management and the Human Resources Department (and consequently the Supervisory Body pursuant to (It.) Legislative Decree 231/2001), with the task of promoting the knowledge of the Code within **CASAGRANDE**, providing all the necessary explanations and training courses and, if appropriate, adopting the opportune sanctions in case of breach of the Code, as well as examining information on possible breaches, promoting the most appropriate investigations and verifications.

### 1.7 *Contractual value of the Code*

The Code is an integral part of the rules that govern the employment relationship. Compliance with the rules of the Code must be considered an essential part of the duties of the Employees of **CASAGRANDE**.

Violation of the provisions of the Code may constitute a breach of the primary duties of the employment relationship or a disciplinary offence, with all legal consequences, including in relation to the preservation of the employment relationship and may entail claims for compensation for any damage resulting therefrom. For Recipients who are not employees, compliance with the Code is an essential prerequisite for continuing the existing professional/collaborative relations with **CASAGRANDE**.

## 2. CONDUCT IN THE MANAGEMENT OF BUSINESS

### 2.1 *Management of business in general*

In conducting its business, **CASAGRANDE** is inspired by the principles of loyalty, fairness, transparency, efficiency and an open market.

Company employees and external collaborators, who act in the name of or on behalf of **CASAGRANDE** itself, in business relations of interest to **CASAGRANDE** and in relations with the Public Administration, shall conduct themselves ethically and in respect of the law; their conduct shall be characterised by maximum transparency, clarity, fairness and efficiency in commercial and promotional relations and by the explicit and binding prohibition of resorting to illegitimate favouritism.

Recipients are also required to behave in line with **CASAGRANDE's** corporate policies, which may never translate, even if aimed at the pursuit of the corporate purpose, into acts contrary to the law, current rules and regulations, or corporate procedures adopted with reference to individual functions.

### 2.2 *Gifts, gratuities and other benefits*

No money, gifts or benefits of undue real or apparent advantages of any kind (for example promises of economic advantages, favours, recommendations, promises of job offers, etc.) may be offered in relations with Customers, Suppliers and third parties in general. However, acts of commercial courtesy are permitted provided they are of modest value and, in any case, such as not to compromise the integrity and reputation

and not to influence the Recipient's independent judgment. The Recipient who receives gifts of any value and kind must communicate it to his/her direct superior or one of the Reference Bodies referred to in point 1.6.

### **2.3 Conflict of interest**

The Recipients must avoid situations and/or activities that could lead to their interests conflicting with those of **CASAGRANDE**, or that could interfere with their ability to make impartial decisions, safeguarding the best interests of the Company.

Should the Recipient experience an objective situation of conflict with the interests of **CASAGRANDE**, the Recipient must communicate it immediately to his/her superior and to one of the Reference Bodies and refrain from any activity connected to the situation that is the source of the conflict.

In the relations between **CASAGRANDE** and third parties, the Recipients must act according to ethical and legal rules, with explicit prohibition of resorting to illegitimate favouritism, collusive practices, corruption or solicitation of personal advantages for themselves or others.

It is obligatory to promptly report to one's superior and/or to one of the Reference Bodies any information that could give rise to a presumed or potential conflict of interest situation with **CASAGRANDE**.

By way of a non-exhaustive example, the following situations can lead to conflicts of interest:

- 1) having economic and financial interests (significant possession of shares, professional assignments, etc.), also through family members, with customers, suppliers or competitors;
- 2) carrying out work, even by family members, for customers, suppliers or competitors;
- 3) accepting money, gifts or favours of any nature from persons, companies or organisations that are in or intend to enter into business relations with **CASAGRANDE**;
- 4) using one's position in the company or the information acquired in one's work so as to create conflict between one's own interests and those of the company.

### **2.4 Relations with Suppliers**

The selection of Suppliers and the formulation of the conditions of purchase of goods and services for the company are dictated by values and parameters of competition, objectivity, propriety, impartiality, fairness in the price, quality of the good and/or service, carefully evaluating the guarantees of assistance and the range of offers in general.

Purchasing processes must be based on the search for the maximum competitive advantage for **CASAGRANDE** and on loyalty and impartiality towards each Supplier who meets the required conditions. Furthermore, the collaboration of Suppliers must ensure the satisfaction of the requirements of the Company's customers in terms of quality and delivery times.

The conclusion of a contract with a Supplier must always be based on extremely clear relations, avoiding, where possible, the assumption of contractual obligations that involve forms of dependence towards the contracting Supplier.

The need to pursue the maximum competitive advantage for **CASAGRANDE**, however, must ensure that the company itself and its Suppliers adopt operational solutions in line with the regulations in force and, more generally, with the principles of protection of all the persons involved, of the products, health and safety, and the environment.

### **2.4.1. Respect for fundamental human rights (ILO convention)**

In particular, the following Standards must be pursued regarding human rights when it comes to the social and ethical responsibility of the **CASAGRANDE** Supply Chain, also in compliance with the fundamental rules of the ILO (International Labour Organisation) convention, defining the minimum requirements for all suppliers. The current version is a fundamental and integral part of any collaboration agreement with **CASAGRANDE** and any related “protocol”.

In order to establish a correct collaboration and partnership, both parties undertake to comply with the standards of human rights and basic ethical principles as well as to comply with the legal regulations in force in the States concerned. Reference is made to the labour standards of the national labour organisation (ILO), which function as minimum standards:

#### **ILO Convention - Articles 29 and 109: *No forced labour.***

Forced labour is not tolerated. Products resulting from forced labour are not accepted by **CASAGRANDE** and its suppliers. Work activities must be performed voluntarily, including the work of persons in detention.

#### **ILO Convention Articles 87 and 98: *Freedom of association - Collective bargaining.***

Every worker has the right to establish a representative or to join a trade union. The possibility of joining collective bargaining agreements between employers' organizations and workers' organizations must be fostered. Employee representatives may not be exposed to discrimination.

#### **ILO Convention Articles 100 and 111: *No discrimination.***

Workers may not be subjected to any discrimination based on gender, race, ethnic or social background, religious or political beliefs. The salary must be equal between men and women.

#### **ILO Convention Articles 138 and 182: *No child labour.***

Child labour is not accepted. The minimum age for employees and workers is calculated based on local legal provisions. Employees and workers may not be below the minimum age of 15 years. Exceptions are allowed only in the framework of a training program. Health, development and school attendance may not be affected.

#### **ILO Convention Article 131: *Payment of adequate salaries.***

Salaries must be sufficient to guarantee the basic needs of the employed and their families, taking into account local living conditions.

#### **ILO Convention Article 155: *Protection of occupational health and safety.***

The protection of health and safety must be guaranteed in the context of the legal provisions and customs of the Country. Employees must be guaranteed adequate protection. Measures for the prevention of

occupational accidents must be guaranteed. The risks of accidents and occupational illnesses must be minimised. Compliance with the aforementioned criteria must be guaranteed for each production site, and must be certified by internationally recognised companies. This before the establishment of commercial relations and for the entire term of the contract without interruption.

**CASAGRANDE** reserves the right to carry out audits without prior notification or to entrust certified companies with their execution.

Failure to comply with the code of ethics may lead to the termination of the employment relationship.

### **2.5 Relations with Customers**

**CASAGRANDE** pursues its own success on the national and international market through the offer of high quality products and services at competitive conditions and in compliance with the rules protecting competition.

Each Recipient, in the context of relations with Customers and in compliance with internal procedures, must promote maximum Customer satisfaction, providing, among other things, comprehensive and accurate information on the products and services provided to them, so as to favour conscious choices.

### **2.6 Proper use of company assets**

Each recipient is responsible for protecting the resources entrusted to him/her and must promptly inform the structures in charge of any threats to or harmful events for **CASAGRANDE**.

In particular, each Recipient must:

- work diligently to protect corporate assets, through responsible behaviour and in line with the operating procedures set up to regulate their use;
- avoid the improper use of company assets that can cause damage or reduce efficiency, or however in contrast with the company's interests;
- obtain the necessary authorisations in the event of use of the asset outside the company.

The growing dependence on information technology requires ensuring the availability, security, integrity and maximum efficiency of this particular category of capital goods.

Each Recipient is required:

- not to send threatening and abusive e-mail messages, not to use low quality language or inadequate style, not to make inappropriate or undesirable comments, which may cause offence to persons and/or damage the corporate image;
- avoid spamming and "chain letters", which can generate data/information/process traffic within the corporate computer network, which significantly reduces the efficiency of the network with a negative impact on productivity;
- not to browse on websites with indecent and offensive content;
- to operate on personal social media (Facebook, Twitter, WhatsApp, etc.) with moderation and common sense, carefully avoiding to provide, directly or indirectly, a negative image of the Company, even representing it incorrectly and improperly, and to jeopardise the privacy of colleagues and anyone dealing with the Company itself (stakeholders and shareholders);

- to scrupulously adopt the provisions of company security policies, in order not to compromise the functionality and protection of information systems;
- to avoid uploading borrowed or unauthorised software onto company systems. Not to make unauthorised copies of licensed programs, neither for personal use nor for use by the company or third parties.

**CASAGRANDE** prohibits, in particular, any use of IT tools in violation of the laws in force, or causing offence to personal liberty, integrity and human dignity especially with reference to minors.

The unintended use of these goods for any purpose outside the company activity can cause serious damage (economic, image, competitiveness, etc.) to **CASAGRANDE**, with the aggravating circumstance that improper use may expose the company to potential criminal and administrative penalties for any illicit actions, and cause the need to adopt disciplinary measures against the Recipients.

### 3. RELATIONS WITH EXTERNAL PARTIES

#### 3.1 *Relations with Public Institutions*

Relations with Public Bodies and Organisations, necessary for the development of **CASAGRANDE** business programs, are reserved exclusively for the company departments delegated to this.

The relations must be based on maximum transparency, clarity, fairness and be such that they do not lead to partial, falsified, ambiguous or misleading interpretations by the institutional public subjects with whom relations are maintained in various capacities.

Gifts, acts of courtesy and hospitality to representatives such as public officials or public service officers are permitted, when they are of modest value and in any case such that they cannot be interpreted by a third party as aimed at acquiring improper advantages. This type of expense must, however, be authorised and adequately documented.

In particular, in relations with Public Entities for access to subsidised funds, **CASAGRANDE**:

- refuses any behaviour aimed at obtaining the contribution unduly, by deception or omission of information due;
- prohibits the allocation of the contribution received for purposes other than those for which it was disbursed.

#### 3.2 *Relations with the mass media*

The relations between **CASAGRANDE** and the mass media are the responsibility of the company's management and must be carried out in conformity with the defined communication policy and tools.

Any employee of **CASAGRANDE** receiving a request for an interview/release of statements regarding the company by any press or communication body is required to inform the Management in advance and to agree with Management on the opportunity and contents of the interview itself.

## **4. CONFIDENTIALITY**

### **4.1. Protection of company secrets**

The activities of **CASAGRANDE** constantly require the acquisition, storage, processing, communication and dissemination of news, documents and other data pertaining to negotiations, administrative procedures, financial transactions, know-how (contracts, deeds, reports, notes, studies, drawings, photographs, software, etc.) which due to contractual agreements may not be disclosed to the outside world or whose improper or untimely disclosure could cause damage to the corporate interests.

Without prejudice to the transparency of the activities carried out and the information obligations imposed by the provisions in force, it is the duty of **CASAGRANDE** staff to ensure the confidentiality required by the circumstances of all information acquired through their duties performed.

The information, knowledge and data acquired or processed during one's work or through one's duties belong to **CASAGRANDE** and may not be used, communicated or disclosed without specific authorisation from the superior in the **CASAGRANDE** organisation, in compliance with specific procedures.

### **4.2. Privacy protection and Regulation EU 679/2016**

**CASAGRANDE** undertakes to protect information relating to its Staff and to third parties, generated or acquired within and in business relations, and to avoid any improper use of this information.

As required by Regulation EU 679/2016, **CASAGRANDE** guarantees that the processing of personal data carried out within its own structures takes place in respect of fundamental rights and freedoms, as well as the dignity of the persons concerned.

**CASAGRANDE** guarantees that the processing complies with the following principles:

- a. **Lawfulness, fairness and transparency** - this means that personal data are processed lawfully, fairly and transparently;
- b. **Purpose limitation** - the data are acquired and processed only within specific procedures, furthermore they are stored and archived in order to avoid knowledge by unauthorised persons;
- c. **Data minimisation** - only the data necessary and appropriate for the purposes in direct connection with the functions and responsibilities covered are acquired and processed;
- d. **Accuracy** - the data must be accurate and, if necessary, updated;
- e. **Retention limitation** - the data will be stored for a defined period in relation to the type of processing;
- f. **Integrity and confidentiality** - **CASAGRANDE** undertakes to adopt appropriate and preventive security measures for all databases in which personal data are collected and stored, in order to avoid risks of destruction and loss or unauthorised access or unauthorised processing.

## **5. STAFF POLICIES**

### **5.1 Management and development of Human Resources**

Human Resources are a central and indispensable factor for the existence of the company. The dedication and professionalism of the employees are fundamental values and conditions for the achievement of **CASAGRANDE's** objectives.

**CASAGRANDE** is committed to developing the skills and capabilities of each employee, so that the energy and creativity of individuals find their full expression in the execution and achievement of the company purpose.

**CASAGRANDE** offers all employees the same opportunities for work and professional development ensuring every necessary effort for everybody to benefit from fair conduct based on merit, with no discrimination. The competent departments must:

- 1) adopt merit, competence and in any case strictly professional criteria for any decision relating to an employee;
- 2) arrange to select, recruit, train, pay and manage employees without discrimination of any kind;
- 3) create a work environment in which personal characteristics cannot give rise to discrimination and in no way to situations of so called bullying. To this end, it implements all the initiatives to monitor the corporate climate, enhancing the indicators acquired in order to work towards continuous improvement.

Each Recipient must actively collaborate to maintain a climate of mutual respect for the personality, dignity and reputation of all.

Recipients are also required to treat personal data of which they become aware of during their work in the most appropriate way in order to protect the privacy, image and dignity of people.

**CASAGRANDE** undertakes to disseminate and consolidate a culture of work safety, developing risk awareness and knowledge, promoting responsible behaviour by all collaborators and working to preserve and improve working conditions, worker health and safety, above all through preventive actions.

The company's activities must be carried out in full compliance with current legislation on prevention and protection; operational management must refer to advanced environmental protection and energy efficiency criteria, pursuing the improvement of occupational health and safety conditions. **CASAGRANDE** also undertakes to guarantee the protection of the working conditions and of the psycho-physical integrity of workers, in respect of their moral personality, avoiding that they suffer illicit conditioning or undue discomfort.

**CASAGRANDE** therefore abhors any behaviour or attitude that is discriminatory or harmful to the person, his or her convictions and preferences (for example in the case of insults, threats, isolation or excessive intrusiveness, professional limitations).

**CASAGRANDE** strives to ensure that, in the context of its activities, the rights provided for by the Universal Declaration of Human Rights are guaranteed in Italy and in the various Countries in which it operates.

**CASAGRANDE** refuses to exploit child labour in whatever Country it operates. In addition to full compliance with the regulations in force in the individual Countries, the company promotes the protection of workers' rights, trade union freedoms and association rights.

Any violation of the provisions of this article must be immediately communicated to Management.

### **5.2     *Respect for colleagues***

**CASAGRANDE** does not allow any kind of harassment towards a colleague, starting with sexual, meaning the subordination of salary or career prospects to the acceptance of sexual favours; it also does not admit proposals for private interpersonal relations, proposed insistently, despite an expressed or obvious dislike of the person involved, which are perceived as unwanted or in any case elements of disturbance.

### **5.3     *Alcoholic and narcotic substances and other illicit drugs***

**CASAGRANDE** believes that it is essential that each employee contributes personally to maintaining the workplace compliant with the moral principles and sensitivity of their colleagues. Therefore the following will be considered a clear risk of violation of such environmental and behavioural precepts:

- a) to provide services under the influence of alcoholic substances, drugs or substances having a similar effect;
- b) to consume or transfer for any reason alcoholic or narcotic substances during work, regardless of where and how it is performed;
- c) to smuggle and aid illegal immigration. These behaviours will be appropriately reported and sanctioned.

### **5.4     *Smoke***

**CASAGRANDE**, in consideration of the current legislation on the matter and the desire to create a healthy and comfortable environment for its employees and visitors, has instituted a general prohibition of smoking in the workplace.

## **6. PROTECTION OF HEALTH, SAFETY OF WORKERS AND OF THE ENVIRONMENT**

The protection of the occupational health and safety of workers and the protection of the environment are ethical principles of great significance and cultural depth, especially as a result of the incorporation of the numerous European Directives in the sector.

- **CASAGRANDE**, fully sharing these principles, sets itself the goal of “working in safety and for the protection of the environment”, namely guaranteeing compliance with the rules of prevention and the adoption of “safe” behaviour for the protection of people and the environment;
- **CASAGRANDE** therefore guarantees the psycho-physical and moral integrity of its collaborators, working conditions that respect individual dignity and safe and healthy work environments, in full compliance with current legislation on the prevention of accidents at work and protection of workers;
- **CASAGRANDE** also carries out its activities in technical, organisational and economic conditions such as to ensure adequate accident prevention, a healthy and safe work environment and adequate environmental prevention;
- **CASAGRANDE** is committed to spreading and consolidating a culture of safety and environmental protection among all its collaborators, developing risk awareness and promoting responsible and safe behaviour by all collaborators.

In particular, the company undertakes to:

- ⇒ eliminate or, where not possible, reduce risks to health, safety and the environment;
- ⇒ identify the risks that cannot be avoided and plan an adequate prevention and protection program, as well as control possible accidents and/or environmental pollution;
- ⇒ adapt work equipment, facilities and workplaces to the relevant legal provisions;
- ⇒ provide adequate personal and collective protection equipment to workers;
- ⇒ give appropriate instructions to workers and periodically provide training updates on health and safety and environmental protection;
- ⇒ supervise the application of the preventive and protective measures adopted and the behaviour of workers, in order to prevent accidents, occupational diseases and environmental incidents;
- ⇒ comply with the relevant legal obligations relating to the protection of the health and safety of workers and the protection of the environment.

Similarly, workers must ensure compliance with the following rules:

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- ⇒ adopt safe behaviour during work and ensure the protection of the environment, namely operate in compliance with company regulations, procedures, instructions, prevention rules in general and this Code of Ethics;
- ⇒ avoid behaviour that poses risks to themselves or others or to the environment itself;
- ⇒ respect the orders given by the hierarchical superiors or by the Employer;
- ⇒ immediately notify superiors of any anomaly, criticality or other dangerous situation of which they become aware during work;
- ⇒ respect the assigned tasks and operational powers;
- ⇒ provide maximum collaboration to the activities, instructions of the Prevention and Protection Service;
- ⇒ participate attentively and actively in organised training activities;
- ⇒ collaborate, responsibly and in compliance with company rules, in the event of an alarm for any emergency situation;
- ⇒ undergo the scheduled health inspections;
- ⇒ develop full awareness of the implementation of the adopted Organisational and Management Model, collaborating with the people responsible for achieving the prevention objectives.

Collaborators/suppliers must also ensure compliance with the following rules:

- ⇒ adopt safe behaviour during their activities, namely operate in compliance with company regulations, instructions received, prevention regulations in general and this Code of Ethics;
- ⇒ comply with company signs;
- ⇒ comply with the contractual terms and conditions that govern the relations between the parties;
- ⇒ in the case of tender, work or staff leasing contacts, comply with the prevention instructions resulting from the cooperation and coordination activities between the parties.

### **6.1 Risk prevention**

The company adopts and implements the Organisational and Management Model which lays down suitable measures to guarantee the performance of the activities in compliance with the law and the rules of conduct of the Code of Ethics and to discover and promptly eliminate risk situations.

### **6.2 Audits**

**CASAGRANDE** adopts specific procedures for checking the compliance of the conduct of anyone acting for the company or within their own sphere, with respect to the provisions of current legislation, the rules of

conduct of this Code of Ethics and the Organisational and Management Model, as well as the Workplace Safety Management System.

Anyone who becomes aware of any violation of the Code of Ethics is required to immediately inform the Supervisory Body.

## 7. TRANSPARENCY OF THE ACCOUNTING INFORMATION AND INTERNAL AUDITS

### 7.1 *Accounting information*

All activities and actions performed and carried out by the Recipients in the context of their work must be verifiable. Accounting transparency is based on the truth, accuracy, completeness and reliability of the documentation of the management documents and the related accounting records.

Each Recipient is required to cooperate so that the operating decisions are correctly and promptly shown in the accounts.

For each transaction, adequate supporting documentation for the activity carried out is kept and filed, in order to allow easy entry into the accounts, the identification of the different levels of responsibility, as well as the accurate reconstruction of the transaction.

Each entry must reflect exactly what is shown in the supporting documentation. Recipients who become aware of omissions, falsifications, alterations or carelessness of the information and supporting documentation are required to report the facts to their superior or to one of the Reference Bodies referred to in point 1.6.

### 7.2 *Internal audits*

**CASAGRANDE** desires to spread a culture of awareness of the importance of an adequate internal control system to all levels of its organisation.

In particular, the internal control system must favour the achievement of corporate objectives and must therefore be oriented towards improving the efficiency and effectiveness of the production and management processes.

All Recipients, in the context of the functions performed, are responsible for the correct functioning of the control system.

Everyone must feel responsible for the corporate assets, both tangible and intangible, which are necessary for the activity performed.

### 7.3 *Anti-money laundering and anti-terrorism*

**CASAGRANDE**, in compliance with current legislation, is committed to preventing the use of its economic and financial system for the purpose of money laundering or terrorist financing (or any other criminal activity) by its customers, suppliers, employees and counterparties with whom it relates in carrying out its business.

**CASAGRANDE** verifies with the utmost diligence the information available on commercial counterparties, suppliers, partners and consultants, in order to ascertain their respectability and the legitimacy of their

business, before establishing business relations with them. The company also ensures that the operations it takes part in do not even potentially involve the risk of promoting the receiving, swapping, or use of money or goods originating from criminal activities.

### 8. WHISTLEBLOWING

**CASAGRANDE** undertakes to operate in a way promoted by individual ethics and their protection and asks and expects its employees and managers, consultants, collaborators, contract workers and the self-employed, contractors, suppliers and customers, and the members of the corporate bodies of the Company and its subsidiaries and associated companies, to align their behaviour with the Code of Ethics of the Group and more generally with the Organisational, Management and Control Model pursuant to (It.) Legislative Decree no. 231 of 8 June 2001, subject to applicable laws and regulations.

In this regard **CASAGRANDE** has structured whistleblowing rules to ensure a certain and confidential channel of information on potential non-conformities with the ethical rules, the general principles on which **CASAGRANDE** operates or the applicable laws or regulations. The application of these rules is limited to cases in which the informant is in good faith and reasonably believes that one of the following events has occurred, is occurring or is likely to occur:

- business management procedures such as to constitute an offence or a breach of the law (for example fraud, corruption, extortion, theft);
- failure to comply with the laws on occupational Health and Safety;
- failure to comply with environmental laws;
- verbal or physical abuse, sexual harassment, racism, discrimination or any other immoral conduct and behaviour;
- discrimination based on gender, race, disability or religion;
- malpractice or professional misconduct;
- nepotism;
- any other serious irregularity, also with reference to the provisions of the Organisational, Management and Control Model pursuant to (It.) Decree Law no. 231/2001.

The procedure should not be used for:

- personal disputes
- unfounded accusations.

**CASAGRANDE** encourages any informant to speak frankly and guarantees confidentiality against any damage or retaliation. However, if the informant believes it is more appropriate that the communication remain anonymous, he/she can make an anonymous report. **CASAGRANDE** takes into consideration and analyses anonymous reports based on:

- the severity of the issue raised;
- the credibility of the disputed issue;
- how likely it is that the issue raised is confirmed by certain sources.

In any case, anonymity is guaranteed to the extent that the confidentiality of the identity is enforceable by law.

Alternatively, you can send an e-mail to the address **odv.casagrandegroup@legalmail.it** or a letter addressed to:

**Casagrande S.p.a. – Via A. Malignani n.1 - 33074 Fontanafredda (PN) - WHISTLEBLOWING**

## **9. ADOPTION, EFFECTIVENESS AND AMENDMENTS**

This Code of Ethics may be periodically studied, updated, amended or revised by the Board of Directors of **Casagrande S.p.a.**

This Code of Ethics is adopted by resolution of the Board of Directors with immediate effect.

**Casagrande S.p.a.**

*The Chairman of the Board of Directors*