

*The expectations of the society and the local communities have been considerably evolved during the last years by increasing the interest towards those companies who show an ethical behaviour by making greater the ability to recognize not only the product and the service, but the process which generates them.*

*Capardoni & C. s.r.l. has decided to start a socially responsible management involving the stakeholders (i.e. suppliers, subcontractors, clients, workers, local communities, public administration) by performing a company policy aimed to respect the standards concerning the corporate social responsibility. This Code has been written and edited to define all the behaviours linked to an efficient company policy of social responsibility, and it specifies the requisites to be performed to allow our organization to:*

*Develop, keep, and reinforce ethic policies and procedures to manage the relative problems which can control and influence.*

*Show to the interested parties that the policies, the procedures, and the practices are in compliance with the listed below requisites to always guarantee a socially correct behaviour.*

*This Ethic Code is inspired to the SA8000 Model and lists the requisites for a socially correct behaviour of the organizations toward the workers, in particular:*

*Child and under-age labour.*

*Forced Labour.*

*The health and safety conditions.*

*The freedom of association.*

*The discrimination.*

*The disciplinary practice.*

*The salary and the working hours.*

*Capardoni & C. s.r.l. (here indicated as “the Organization”) has decided to follow these standards, not only to concretely respect the human rights of the workers in every kind of process and organization, but also to promote it with its own partners. The aim of this approach is to generate a consequential process of adjustment to the standards by all the interested parties, influencing the behaviour and increasing the ethical-social quality.*

*The following Ethic Code is voluntary and verifiable, it is based on the Universal Declaration of Human Rights, on ILO documents and other international regulations concerning the human and labour rights, and the national laws to promote and protect the personnel of an organization, who creates the products and services, by including the personnel employed by the organization itself and by the interested parties.*

*The Organization commits to respect the local, national, and applicable laws, the field regulations, and other requisites to which the organization agree, as well as the following Ethic Code.*

*The Organization commits to respect the principles of the following international conventions and recommendations:*

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*C001 - Hours of Work (industry) Convention and R-116 Reduction of Hours of Work Recommendation*

*C029 - Forced Labour Convention and C105 -Abolition of Forced Labour Convention*

*C087 - Freedom of Association and Protection of the Right to Organize*

*C098 - Right to Organize and Collective Bargaining Convention*

*C100 - Equal Remuneration Convention and C111 - Discrimination (Employment and Occupation) Convention*

*C102 - Social Security (Minimum Standards) Convention*

*C131 - Minimum Wage Fixing Convention*

*C135 - Workers' Representative Convention*

*C138 and R146 Minimum Age Recommendation*

*C155 and R164 Occupational Safety and Health Recommendation*

*C159 - Vocational Rehabilitation and Employment (Disabled Persons) Convention*

*C169 - Indigenous and Tribal People Convention*

*C177 - Home Work Convention*

*C181 - Private Employment Agencies Convention*

*C182 - Worst Forms of Child Labour Convention*

*C183 - Maternity Protection Convention*

*Code of Practice concerning HIV and AIDS and the World of Work*

*Universal Declaration of Human Rights*

*International Covenant on Economic, Social and Cultural Rights*

*International Covenant on Civil and Political Rights*

*United Nations Convention on the Rights of a Child*

*Convention on the Elimination of All Forms of Discriminations Against Women*

*Convention on the Elimination of All Forms of Racial Discrimination*

*Guiding Principles of United Nations on Business and Human Rights*

*Besides respecting the above-mentioned principles, Capardoni & C. s.r.l. sets some quantity goals concerning the work practice and the human rights:*

- 1. Reduction of workplace accidents: by 2030 there will be a monitoring and a reduction of the workplace accidents through the introduction of the near miss.*
- 2. Education on diversity and inclusion: by 2030 the Organization commits to guarantee that the 20% of the employees will receive annual education courses on the diversities and elimination of discrimination at the workplace.*

- *Child Labour*

*The Organization does not involve and support the child labour.*

- *Selection and Employment*

*The Company involves a fair approach during the selection and employment of the personnel towards every candidate's profile by preventing any kind of discriminatory and/or disrespectful behaviour.*

*The Company presents neutral job descriptions by respecting the genre and recruiting processes both towards males and females.*

- *Career Management*

*During the entire professional cycle of the worker, the Company pays attention to the fair opportunities of professional development and promotions by basing them exclusively on the personal capacities, skills and professional levels that characterise the employee, and encouraging changes and career improvements.*

*The Company tries to balance the presence of men and women at the workplace both concerning the specific field and the job, by easing the diversity and the physical and psychological wellness of all the personnel. The Company offers to the whole personnel a specific education regarding the improvement of the professional abilities and the management of the problems which can arise at the workplace.*

- *Parenthood and Care*

*By respecting the human being and the realization of the private life, Capardoni & C. s.r.l. recognizes the right of parental leave by promoting the request of maternity and paternity leave.*

*The Company protects and guarantees the working conditions prior to the parental leave, by supporting the worker during the return at work through supporting activities (part-time working hour, and smart working, if specifically requested, etc.)*

- *Work-life Balance*

*Capardoni & C. s.r.l. eases the full balance between private life and work by setting conditions able to offer to the employee the possibility of smart working and the flexible working hours. The working activities are performed only during the working hours by guaranteeing and allowing the participation of all the people without overcoming the usually working hours.*

- *Discrimination and prevention of every kind of physical, oral, and digital abuse at workplace*

*It is forbidden every kind of physical, oral, or digital abuse at workplace. To prevent and manage the abuses, the Company considers a prior risk assessment and an analysis of the reported adverse events. Capardoni & C. s.r.l. pays a particular attention to the language used among and towards the employees by promoting a polite and well-educated communication.*

*Capardoni & C. s.r.l. disapproves every form of discrimination among its workers, included the exclusion or preferences based on the race, sex, age, religion, political opinion, nationality, or social class. During the personnel employment and recruiting phase and concerning the promotions and/or company benefits, Capardoni & C. s.r.l. commits not to take into*

*consideration the above-mentioned factors by performing a process managed as it is described in the procedures (research, selection, and management of personnel).*

*In case of discrimination or abuse events, the employees are free to denounce them by filling in anonymous forms available for all the workers.*

- **Forced and Obligated Work**

*The Organization commits not to use or support the forced or obliged labour included the jail labour, as defined by the C029 Convention. The Company must not have original identity documents and must not ask to the employees the payment of “deposit” amounts of money at the beginning of the work relationship. Neither the Organization, nor any other party providing workforce to the Organization must keep any part of the salary, allowances remuneration, properties, or personnel documents to oblige them to continue to work for the Organization itself. The Organization commits to guarantee there will not be commissions or costs concerning the employment totally or partially borne by the workers.*

*The personnel must have the right to leave the workplace after the end of the usual working hours, and it is free to finish the working relationship by giving a fair notice to the employer. Neither the Organization, nor any other party providing the workforce to the Organization must use or support the human trafficking.*

- **Health and Safety**

*The Organization commits to guarantee a safe and healthy workplace, and to adopt effective measures to prevent potential accidents, injuries or diseases which can happen consequently or in relation to or during the work development. The Organization commits to possibly reduce or eliminate the causes of all the risks at the workplace by considering the main state of knowledge of the field and every specific risk.*

*The Organization commits to assess all the risks concerning the workplace, included those linked to the job tasks, for the newly working mothers, pregnant or in lactation women in order to guarantee all the fair measures to eliminate or reduce every kind of risks for their health and safety.*

*If the Organization is not able to effectively eliminate or reduce the causes of every risk at the workplace, it commits to provide suitable personnel protective equipment to the personnel at its own expense. In case of injury at the workplace, the Organization always provides the first aid and supports the workers in order that they receive the suitable medical care.*

*The Organization commits to elect its own representative, who must guarantee a safe and healthy workplace for the personnel and to apply the required safety and health requisites.*

*The Organization commits to guarantee a regular and effective education concerning the health and the safety, included all the instructions at the workplace and, if necessary, specific instructions for the performed task. This training must be repeated for the new personnel or those employees to which are assigned new tasks, as well as in cases of accidents and when the technological changes and/or the introduction of new tools can involve new risks for the health and the safety of the personnel.*

*The Organization commits to set documented information to identify, prevent, reduce, eliminate, or face the potential risks for the health and the safety of the personnel.*

*It commits to keep the written reports of all the accidents which happen at the workplace and in all the structures of the Organization.*

*It commits to guarantee to the personnel the access to cleaned bathrooms, drinking water, places suitable for the lunch break, and hygienically areas suitable for work or personal needs.*

*All the personnel have the right to go away in case of immediate and severe danger, without asking the permission to the Organization.*

- *Freedom of Association and Collective Bargaining*

*The personnel have the right to create, take part to, and organize labour unions, and to collectively bargain with the Organization. The Organization commits to respect this right and to effectively inform the personnel about its freedom to freely subscribe to every workers organization without any negative consequence or revenge by the Organization. The Organization commits not to interfere in the creation, performing and management of the above-mentioned workers organizations or in the process of collective bargaining.*

*If the right of freedom of association and collective bargaining is limited by law, the Organization commits to allow the workers to elect their own representatives.*

*The Organization commits to guarantee that the members of the labour union, the representatives of the workers, and the personnel who organizes the workers are not subjected to discrimination, harassment, intimidation or retribution due to their membership to the labour union, to be workers representatives, or to be committed into the workers organization, and it must guarantee that these representatives can have contacts with the subscribers at the workplace.*

- *Discrimination*

*The Organization commits not to use or support any kind of discrimination in the employment process, in the salary approach, access to education, promotion, termination of work relationship or retirement according to the race, nationality, social class, birth, religion, disability, genre, sexual orientation, family responsibility, civil status, labour union membership, political opinions, age, or any other condition which can generate discrimination.*

*The Organization commits not to interfere with the personnel rights to follow principles or practice, to satisfy needs linked to race, nationality, social class, religion, disability, genre, sexual orientation, family responsibilities, labour union membership, political opinions, or any other condition which can generate discrimination.*

*The Organization does not allow any threatening, offensive, exploiting, sexually coercive behaviour including the gestures, the language, and the physical contact, at the workplace and in all the other structures of the organization regardless they are property of, rented by, subcontracted by the organization or property of the services provider.*

*The Organization commits not to subject the personnel to any pregnancy or virginity test.*

- *Disciplinary Practice*

*The Organization commits to treat the personnel with dignity and respect. There are no physical punishments, physical or mental coercion, oral abuse towards the personnel. Severe or inhuman treatments are not allowed.*

- **Work Hours**

*The Organization respects the current regulations, the collective bargaining, and the field standards concerning the work hour, the rests, and the bank holidays. The normal working week - excluded the overtime - must be the one set by the law, and it does not exceed 48 hours.*

*The Organization commits to guarantee one day of rest at least to all the personnel after six consecutive working days. The overtime work must be voluntary and must not overcome 12 hours per week.*

- **Salary**

*The Organization commits to respect the personnel right to have a decent salary, and to guarantee that the paid salary for a normal working week - overcome excluded - is in line with the legal standards or the minimum field standards, or to collective bargains. The salaries must satisfy the primary needs of the workers and provide with a discretionary income.*

*The Organization commits not to apply deductions on the salary for disciplinary reasons - except for what indicated by the freely bargained collective contract.*

*The Organization commits to guarantee that the salary details and workers compensations are clearly and written expressed for every salary period.*

*The Organization guarantees that the salaries and the compensations are paid in compliance with the law and in a comfortable way for the workers.*

*The overtime work is paid with an increase as set by the national law or the collective bargaining.*

*The Organization commits not to use contract agreements of “only workforce,” consecutive short-term contracts and/or false apprenticeship programs or other solutions meant to avoid the fulfilment of the obligations towards the personnel expected by law and applicable regulations concerning the health and social safety.*

- **Suppliers and Subcontractors**

*The Organization performs its activities with integrity, fairness, and professionally by achieving its goals and trying to complete its mission with loyalty, reliability, honesty, and expertise and respecting the laws and the current regulations and the principles of the following Code. Through the Ethic Code, the Organization commits to set the minimum standards the Organization needs to be in compliance with, as well as the principles and the criteria to which the associated companies, the suppliers and the potential subcontractors must inspire their management. The Organization commits to promote and extend the knowledge of the following Code to suppliers and subcontractors, aware of the need to develop culture and awareness on the topics of social responsibility to make all the efforts*

*effective and efficient. The Organization commits to progressively act towards its own suppliers and subcontractors to gain their respect of all the requisites and principles of this Code.*

- ***Implementation Mechanisms and Decisive Actions***

*Regarding the possible violation of the current regulation presented in the following Code, everyone can and must talk to the Direction offices, and if it is not possible, to the delegated managers. The Organization guarantees that nobody can be subjected to revenges, problems, and discriminations of every kind for having reported the violation of the Ethic Code, and after the reporting, there will be promptly checks and suitable resolving actions. The violation of the principles set by the current code compromise the trust between the organization and its administrators, employees, collaborators, suppliers, and it will be punished through suitable measures. In order to protect its image and its resources, the Organization will avoid having relationship with subjects who do not operate according to the current regulation and the values and principles of the Ethic Code.*

- ***Honest Behaviours***

*The honesty is the main principle at the base of every activity at Capardoni & C. s.r.l. by inspiring its initiatives, its accounting, its communications: it is the essential element of the management.*

*The relationships with the stakeholders are based on fairness, collaboration, loyalty, and respect.*

- ***Transparency, Completeness and Truth of Information***

*Capardoni & C. s.r.l. recognizes the main value of the fair information to Members, corporate bodies of management and control, and the relevant departments regarding the corporate and accounting management.*

*The Employees and the External Collaborators of Capardoni & C. s.r.l. need to provide complete, clear, true, understandable, and accurate information so that the stakeholders and all the other people who get in touch with the company are able to take independent decisions, aware of the involved interests, of the potential alternatives and the relevant consequences.*

- ***Fair Corporate Management and Use of Resources***

*Capardoni & C. s.r.l. achieves its corporate purpose by respecting the law, the statute, and social regulations by guaranteeing the correct functioning of the corporate divisions and the protection of the property and participatory rights of its members by protecting the integrity of the share capital and property.*

- ***Confidentiality of the Information***

*Capardoni & C. s.r.l. guarantees the confidentiality of the information, follows the regulation regarding the personal details and do not research private details through illegal means.*

*All the information available to Capardoni & C. s.r.l. are treated with respect of confidentiality and the privacy of the interested subjects.*

*The Corporate Bodies, the Employees, the Consultants, the External Collaborators, and the Partners of Capardoni & C. s.r.l. must not keep and disclose private information concerning the Company activities for reasons not connected to the Company activity itself.*

- *Respect of Person*

*Capardoni & C. s.r.l. promotes the respect of physical, moral, and cultural integrity of the person and the respect of the relationships with others.*

*For this reason, it protects the workers from psychological violence and fight against every discriminatory behaviour or able to damage the people, their beliefs, and preferences (for example insults, threats, isolation or excessive intrusiveness, profession limitations).*

*Sexual abuses are forbidden as well as behaviours or speeches which can damage the people's sensitivity (for example the show of images with sexual concerns, ongoing and continuous allusions).*

*The Employee or the External Collaborator of Capardoni & C. s.r.l. who has been subjected to abuses or discriminations due to age, sex, sexuality, race, health condition, nationality, political opinion, and religion can report the event to the Manager or Direction, which will assess the effective violation of the Ethic Code.*

- *Relationships with Public Administration and Local Organizations*

*Capardoni & C. s.r.l. commits to keep transparent, fair, and legal relationships with the Public Administration - which will be abbreviated as P.A. in the following document - and the Local Organizations for the development of its activity.*

*For this purpose, the company will avoid as much as possible to be represented by a physical person in its relationships with the P.A. on the assumption that the plurality of subjects allows to minimize the risk of having interpersonal relationships not in line with the Company purpose, and if it is not possible, the tracking of the relationship will be guaranteed.*

*During the business negotiations, request or relationships with the P.A., the Organization forbids to the Addressees of the following Ethic Code to:*

- ✓ *adopt behaviours which can give benefits or advantage undue to the Company through the omission, alteration, or falsification of the information.*
- ✓ *adopt behaviours to directly or indirectly influence the counterpart's decision in an unfair way, which is to directly or indirectly pay and offer payments or material benefits to public employees and officials to influence their activity and get a benefit.*
- ✓ *adopt every kind of illegal behaviour.*
- ✓ *analyse and offer job and/or business opportunities which can favour P.A. Employees from a personal point of view, which means request or obtain private information able to compromise the integrity and the reputation of both of the parties.*
- ✓ *agree every kind of favour for public employees or officials.*

*The above-mentioned information is applied to third parties or consultants involved by the Company to be represented in the relationships with the P.A. In the selection of these subjects, the Company will favour criteria of professionalism, expertise, and fairness by exclud-*

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ing everyone who has organic or employment relationships with the P.A., even through intermediaries, or ties of kinship.

- *Presents, Free Gifts and Benefits*

*In the business relationships with clients and suppliers, the donations, benefits - direct or indirect- free gifts, acts of courtesy and hospitality, must not compromise the Company image, and not be interpreted as aimed to obtain a favour treatment, which is not defined by the market rules.*

*The presents must be documented to let the suitable assessments and must be authorized by the manager.*

*However, it is absolutely forbidden every form of presents to Italian or foreign public officers and their families, which can influence the independent judgement or favour every kind of benefit. This is applicable to promised, offered, or received presents, that is every kind of benefits (i.e. the promise of a job offer, etc.)*

*The addressees of the present Ethic Code who receive gifts or favour treatments from clients or suppliers that go beyond the usual courtesy relationships, that is every kind of gifts from P.A. officers, must report it to their manager. The manager will immediately inform the specific organs and/or company department, which will take suitable measures after the preliminary assessments.*

- *Free Competition*

*Capardoni & C. s.r.l. recognizes the free competition in the concerning market as a decisive factor of development and continuous company improvement. The Company Organs, the Employees, the Collaborators, and the Members of Company Organs must not accept assignments and free gifts from suppliers or partners, except for what authorized by the Direction.*

- *Prevention of the Conflict of Interest*

*The situations of conflict of interest - event potential - must be avoided in the business activities, that is all the situations in which a member of Company Organs, an Employee, a Consultant, an External Collaborator, or a Partner pursue an interest different from the one of Capardoni & C. s.r.l. and the stakeholders' interest balancing and take a personal advantage from Company's business opportunities.*

*General Management*