

## ETHICAL CODE

### INTRODUCTION

The Ethical Code describes the Principles of Conduct and Action that have always inspired Vilux Viterie in its actions as well as Managers, Directors, Employees and Collaborators have to do.

Therefore the present document must be a constant reference and guide all company operations into: internal relationships between Managers, Directors, Employees and the external one with Customers, Suppliers, Public and Private Bodies with which will be maintained relations in various ways.

The Ethical Code is also the reference document as a guarantee of the above-mentioned values and of prevention of unlawful acts within the Company structure.

### GENERAL PRINCIPLES OF CONDUCT

- a) Respect towards anyone independent of role, gender, culture, religion, race.  
Due to the mentioned above - discrimination, harassment, personal insults, or insults of any kind are not tolerated.  
Whereas, it is to be favoured the behaviours that promote the personal and professional growth of each person and that place collective interests before personal satisfaction.
- b) Morality as an equivalent of honesty, fairness and good faith - without any compromise – in the carrying out of own activity both within the company and the external relationships whatever their duties are.
- c) Integrity between relationships with superiors, colleagues, subordinates carrying out ways of treatment and data communication – in your possession – inspired to openness, sincerity, completeness, rigour, sharing.
- d) Professionalism in the implementation of own duties, making every effort and carrying out the necessary and dutiful in-depth and updating activities diligently. Attention to health, safety at work, respect and protection of the environment must be a priority in all activities.

### GENERAL PRINCIPLES OF ACTION

- a) Respect of the legality - in all fields - with the application and compliance with national and international laws and regulations in force.  
Respect and observance of the deontological codes and behavioral rules adopted by the trade associations and by the applicable collective agreements.  
Each operator must commit - independently or through the Company - to acquire with due diligence the necessary knowledge of the rules to be applied in the carrying out of their own duties.
- b) Respect of the environment and protection of environmental resources as a primary objective that each operator must pursue in the carrying out of their own roles and activities.

To confirm what has been stated and for the pursuit to a continuous improvement – Vilux Viterie carried out and wants to satisfy the requirements of the reference standard ISO 14001 concerning the environmental management systems.

- c) Respect of the health and safety at work with the technical planning of the workplaces, the equipment and the procedures set up at the highest level of respect of current regulations in matters. Each operator must pay utmost attention in the carrying out of his own activity following all the safety and prevention measures established to avoid any possible risk for himself, collaborators and colleagues.  
The risk assessment report verified and updated periodically and the BS OHSAS 18001 guidelines – which are implemented at the company - are the specific references to be followed in the observance and implementation of the precepts contained in the company's policy document.
- d) Respect of the truth and openness in any document or corporate communication in accordance with the principles of clarity, completeness, accuracy, precision - in compliance with current legislation - where required.  
For each operation - it will be kept appropriate supporting documentation in order to allow the registration, the reconstruction and the identification of responsibilities.
- e) Respect of the collective, by safeguarding the environment, customs and traditions in any context the Company operates. Respect of the ethical and deontological principles in relations with associations, committees, public or private organizations - guaranteeing absolute openness and traceability in the case of donations or financial contributions.
- f) Protection of the company structures and equipment included information technology - working with due diligence as well as in line with the operating procedures arranged as a guarantee of the efficiency and the safety.
- g) Protection of the company information including the information technology by ensuring its availability, integrity, confidentiality - as required – on the respect of the privacy in the processing of sensitive personal data according to current legislation.

## **INTERNAL AND EXTERNAL RELATIONSHIPS**

- a) Internal relationships must be based on utmost mutual respect, professionalism, loyalty, order and decency according to the rules and Company structure. Bullying, intolerances or inconveniences of any kind are not tolerated under no circumstances.
- b) Relationships between suppliers must set up on utmost sincerity and openness, according to objective assessments as regards the competitiveness, knowledge, quality and reliability. Dependency or blackmail situations are not tolerated under no circumstances.
- c) Relationships between customers must be kept with the utmost professionalism as for knowledge, rigour, wisdom, efficiency - principles of honesty, loyalty, availability, openness are considered fundamental. The main ambition must be to move up and exceed customer's expectations both as proposals and results.

- d) Relationships between external organizations of any kind are carried out by clearly authorized personnel - or assigned to this – on the respect of the precepts of present Code as well as of every norm or regulation applied - with specific attention – to the principles of impartiality and independence, avoiding every possible situation that substitutes, causes or appears in conflict of interest.

## **FULFILMENT AND SANCTIONS**

- a) The observance of Ethical Code must be considered essential part of contractual obligations of Employees in accordance with and by effect of Art. 2014 Civil Code and also for all the Collaborators, Directors, Managers and Company representatives.
- b) In order to guarantee the implementation of the present document, Vilux Viterie arranges for the distribution as follow: online through the publication on own website and on a folder per Intranet, in paper form through the exposure on the company notice board and the delivery of a copy to all Employees, Collaborators and who entertains continuous relationships with the Company. Suitable and specific internal training courses are established for Employees and Collaborators.
- c) The violations of any rule mentioned in the Ethical Code will involve for the Employees the application of disciplinary measures or penalties related to seriousness of the facts on the respect of the procedures established by the C.L.A. . The violations by other figures - outside the company - will be seriously analysed and could also involve the interruption and termination of contractual relationships except for more serious events indictable in accordance with the law. Actually Vilux Viterie will not have any kind of relationships with persons who do not intend to behave on the respect of the principles prescribed by the Ethical Code.
- d) Vilux Viterie reserves to increase and better clearly the different points with the issue of specific attachments.