

ADMINISTRATION AND PLANT

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Iscr. Reg. Imp. Como n. 02048860262
Cod. Fisc. 02048860262 - Part. IVA IT
01836320133

CODE OF ETICHS

MetalFar Prodotti Industriali S.p.A.



SINCE 1961
A FARINA COMPANY

Rev. 1 dated 03/05/2024	Issued by		Approved by
	QAM Luca Frigerio 	HR Vanessa Bartesaghi 	GM Eugenio Messa 

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VISION

METALFAR PRODOTTI INDUSTRIALI S.p.A is aware of the importance of a company being recognized, not only by the competence of its collaborators and the high quality of the service provided by customers, but also by the attention paid to the needs of the whole community.

The principles that have always inspired our work are formally gathered in this CODE OF ETHICS in the belief that reliability is built on a daily basis by respecting standards and by giving value to people.

This Code of Ethics represents, therefore, a distinctive and identifying element towards the market and third parties, whose knowledge and sharing, required to all of those who work in the Company or whoever collaborate with it, constitute the foundation of our activity and the first step to contribute to the pursuit of our vision.

The objective of Metalfar Prodotti Industriali S.p.A. is therefore to pursue excellence in the market in which it operates, through Sustainable Development, safeguarding the Environment and the Safety of the people involved. This could be done through the consistency of a behavior that respects Social Ethics by obtaining satisfaction and ensuring added value for the Employee, for the Customer and, in general, for the Community.

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PURPOSE & RECIPIENTS

This Code of Ethics illustrates the set of ethical and moral principles that are the basis of activities of Metalfar Prodotti Industriali S.p.A.

In addition, these are the lines of conduct adopted by the Company both within its own business (in relations between employees) and externally (in relations with institutions, suppliers, customers, business partners, political organizations, etc.) defined as Stakeholders. The compliance with these principles is of fundamental importance to achieve the Company's mission and to guarantee its reputation in the socio-economic context in which it operates.

At first, it should be noted that we firmly believe that every activity must be carried out ethically, recognizing itself in the principle enshrined in art. 41 of the Constitution.

According to this article, Private economic initiative "may not be carried out in contrast with social utility or in such a way as to harm security, freedom or human dignity."

This Code is binding for all Recipients, whether they are Directors or Employees and for whoever operates/collaborates, on a permanent or fixed-term basis, on behalf of our Company.

The Code will be widely disseminated within the internal governance structure, and widely communicated externally, including through its website.

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1. GENERAL PRINCIPLES

The fundamental ethical principles that all addressees of this document are required to respect are:

- Compliance with the laws and regulations in force both in Italy and abroad
- Definition of tasks with distribution of responsibilities and adequate levels of authorisation, in order to avoid functional overlapping and concentration of critical issues to single subjects
- Clarity in the assignment of responsibilities and powers, with consistency with the tasks assigned
- Respect for the principles at all levels of the company, of legality, fairness, non-discrimination, confidentiality, diligence and loyalty. In detail:

1.1 *Legality*

All Recipients are therefore required to comply with all applicable legislation and to keep up to date with legislative developments, also by making use of appropriate training opportunities

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

1.2 *Fairness*

Fairness and moral integrity are a 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 to obtain improper advantages.

In carrying out their activities, the Recipients are required not to accept favours or benefits of any kind and, in general, not to accept any quid pro quo in order to improperly grant advantages to third parties.

In turn, the Recipients must not make donations of money or goods to third parties or in any case offer illicit benefits or favours of any kind (except for commercial courtesy gifts authorized by the Company) in connection with the activity they provide for the benefit of Metalfar Prodotti Industriali S.p.A.

The intrinsic conviction of acting in the interest of the Company does not exempt the Recipients from the obligation to promptly comply with the rules and principles of this Code.

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1.3 Non -Discrimination

In relations with Stakeholders and in particular in the selection and management of personnel, in the organization of work as well as in the choice and management of suppliers and in relations with Bodies and Institutions, Metalfar Prodotti Industriali S.p.A. rejects any discrimination regarding age, sex, race, sexual orientation, state of health, political and trade union opinions, religion, culture and nationality of the interlocutors.

1.4 Confidentiality

Metalfar Prodotti Industriali S.p.A. undertakes to ensure the protection and confidentiality of the personal data of Recipients and Stakeholders, in compliance with all applicable regulations on the protection of personal data.

Recipients are required to maintain the strictest confidentiality of documents that may reveal know-how, transport/commercial information and corporate transactions.

1.5 Diligence

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

The Recipients must refrain from any activity that may constitute a conflict with the interests of Metalfar Prodotti Industriali S.p.A., renouncing the pursuit of personal interests in conflict with the legitimate interests of the Company.

In cases where the possibility of the existence of a conflict of interest can be identified, the Recipients are required to contact, without delay, their hierarchical superior so that the company can assess, and possibly authorize, the potentially conflicting activity.

In the event of a breach, the Company will take all appropriate measures to put an end to the conflict of interest, reserving the right to act for its own protection.

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1.6 Loyalty

Metalfar Prodotti Industriali S.p.A and the Recipients are committed to fair competition, in compliance with national and EU legislation, in the knowledge that virtuous competition is a healthy incentive for innovation and development processes, as well as the interests of consumers and the community.

2. RELATIONS WITH EMPLOYEES AND COLLABORATORS

2.1 Personnel Selection

For Metalfar Prodotti Industriali S.p.A., human resources play a fundamental role in the development and guarantee of its products, through the utmost attention to professionalism, dedication, territoriality, loyalty, honesty, collaboration and sense of belonging.

The evaluation and selection of personnel are carried out according to fairness and transparency, respecting equal opportunities in order to combine the needs of Metalfar Prodotti Industriali S.p.A. with the professional profiles, ambitions and expectations of the candidates.

Metalfar Prodotti Industriali S.p.A. commits to taking all necessary measures to avoid any form of favoritism in the personnel selection process using objective and meritocratic criteria, respecting the dignity of candidates as well as in the interest of the company's good performance.

Any kind of investigation into ideas, political orientations, preferences, habits, personal tastes, or more generally into private life is strictly forbidden.

The personnel hired, also through the implementation of this Code, receive clear and correct information about the roles, responsibilities, rights and duties of the parties. The privacy of employees is guaranteed according to the standards for processing and storing personal data

2.2 Personnel Management

Metalfar Prodotti Industriali S.p.A. protects and enhances its human resources, committing itself to maintaining the necessary conditions for the professional growth, knowledge and skills of each person, carrying out the appropriate training for professional updating and any initiative aimed to achieve this goal.

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Metalfar Prodotti Industriali S.p.A Metalfar promotes its workers participation within life's Company by providing participatory tools capable of collecting workers' opinions and suggestions, ensuring their widest participation.

Despite the maximum availability towards the Company, no worker can be obliged to perform tasks, services or favors not due on the basis of his or her employment contract within the company.

The Company is firmly committed to contrast episodes of mobbing, stalking, psychological violence and any discriminatory behaviour that is detrimental 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 everyone's freedom.

3. WORKING ENVIRONMENT

Metalfar Prodotti Industriali S.p.A. is committed to offering its staff a healthy and safe working environment that respects its employees' dignity.

Compliance with the provisions of Legislative Decree 81/2021 as amended is at the heart of the company's safety policy, and in particular the basic criteria are:

- Risk assessment
- Adequacy of the work-man relationship
- Choice of equipment and working methods
- Consideration of technical developments
- Reduction of dangers and sources of danger
- Prevention programme
- Assessment of personal protective equipment over and above legal requirements

Safety in the workplace is ensured both by implementing the provisions of the law in force, and by actively promoting the culture of safety through specific training programs.

Staff training is a key element of the management system adopted.

Besides, the Company protects its workers health by ensuring compliance with hygiene and health prevention.

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4. SURROUNDING ENVIRONMENT

Metalfar Prodotti Industriali S.p.A. focuses on the environment that hosts us, respecting the peculiarities of the territory and committing to its preservation.

The means to achieve this goal is the maintenance of an integrated environmental management system that complies with international standards; furthermore, the focus on corporate sustainability through technological updates, waste management and virtuous purchasing management with a view to recycling is increasingly fundamental.

5. COMPANY ASSETS

Employees are obliged not to use for private purposes or transfer to third parties any company assets. In any case, such assets must be used exclusively for the achievement of company objectives. Metalfar Prodotti Industriali S.p.A. reserves the right to block improper and illegal uses of its assets and infrastructure through appropriate control systems.

All Personnel are obliged to use only the hardware and software equipment made available to them, and exclusively for purposes related to the performance of their duties and in compliance with the provisions issued by the company. In detail, it is compulsory to comply with the rules on the use of electronic mail and web browsing, it is compulsory to comply with computer security rules, it is forbidden to duplicate installed programs and any modification of what is in place.

6. BUSINESS MANAGMENT

6.1 *Compliance with Internal Procedures*

Metalfar Prodotti Industriali S.p.A. believes that management efficiency and a culture of control are essential elements for its goals achievement.

Recipients are required to strictly comply with the Company's internal procedures.

6.2 *Accounting Management*

Withing the accounting management, the Recipients are required to act in compliance with the principles of truthfulness, accuracy and transparency. By doing so, Metalfar Prodotti Industriali S.p.A reputation is protected both internally and externally.

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

Therefore, all items reported in the accounts must be clear and valid and they should avoid any form of omission, falsification and/or irregularity.

6.3 Estate Protection

The Recipients carry out their functions by trying to rationalize and contain the use of company resources.

The Recipients are required to correctly apply the provisions relating to security to protect the hardware devices from unauthorized access, which could seriously harm the rights to the protection of personal data of the staff and customers of Metalfar Prodotti Industriali S.p.A.

6.4 Communication

Metalfar Prodotti Industriali S.p.A. provides Stakeholders with suitable communication tools through which they can interact with the company to submit requests, ask for clarifications or make complaints.

The Company promotes effective corporate communication capable of putting the company in contact with civil society, in order to understand the demands, needs and requirements of the community and to spread its values and mission.

7. EXTERNAL RELATIONS

7.1 Relations with Authorities and Public Administration

Relations with Authorities and 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.

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The Recipients, unless authorized, may not relate in the name and on behalf of Metalfar Prodotti Industriali S.p.A. with Authorities and Public Administration.

In relations with Public Officials, Public Service Officers and Public Administration in general, the Authorized Recipients shall adhere to the highest levels of fairness and integrity, refraining from any form of pressure, explicit or veiled, aimed at obtaining any undue advantage for themselves or for Metalfar Prodotti Industriali S.p.A.

7.2 Relations with Political and Union Organisation

Metalfar Prodotti Industriali S.p.A. does not favour or discriminate against any political or trade union organization.

The Company refrains from making any undue contribution in any form to political parties, trade unions or other social formations, except for specific exceptions and in any case always within the limits of what is permitted by the regulations in force. Metalfar Prodotti Industriali S.p.A.

Recipients are required to refrain from any direct, indirect or false pressure on politicians or trade union representatives.

7.3 Relations with customers and suppliers.

The Recipients deal with third parties with courtesy, competence and professionalism, in the belief that the protection of the Company's image, Reputation and then the achievement of the Company's objectives depend on their conduct.

In particular, the Recipients must refrain from any form of unfair or deceptive conduct that may lead customers or suppliers to rely on unfounded facts or circumstances.

Recipients are required to constantly strive to offer punctual and high-quality services to customers, trying to limit any form of inefficiency or delay in order to maximize customer satisfaction.

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

Moreover, the choice of suppliers is made on the basis of objective criteria of quality, cost-effectiveness, opportunity and efficiency.

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

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The Recipients must put in place every possible control so that suppliers and customers are also able to comply with the fundamental ethical principles set out in this Code.

7.4 Relations with media

Maximum clarity, correctness and timeliness in the dissemination of news are the fundamental criteria of conduct in relations with the media, at any level, local, national or international. In particular, under no circumstances may false, tendentious news or news that does not respect the honour of others be disseminated.

Relations with the various media are inspired by the criterion of equal treatment as regards the timeliness of dissemination and completeness of the news.

The personnel of Metalfar Prodotti Industriali S.p.A. do not independently maintain relations with the press or other media and refrain from any public statements, even in the form of mere clarifications that may affect the image of the Company.

All relations with the media must be agreed in advance with the Company.

7.5 Social Policy

Metalfar Prodotti Industriali S.p.A. pays the utmost attention to the needs of the community, and aims to develop it by supporting and promoting humanitarian, solidarity, cultural and sports initiatives through donations, sponsorships and support.

8. INTERNAL CONTROL SYSTEM

Compliance with the provisions of this Code is entrusted to the prudent, reasonable, careful supervision of each of the Recipients, within the scope of their respective roles and functions within the company.

All Recipients are invited to report to their direct superiors the facts and circumstances that may be against with the principles and provisions of this Code, or anonymously via the 'whistleblowing' link on the company's website.



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The management and the supervisors will take all necessary measures to put an end to the violations, being able to resort to any disciplinary measure in compliance with the law and workers' rights, including trade union rights.

9. GUIDELINES OF THE SANCTIONING SYSTEM

The internal control system is oriented towards the adoption of tools and methodologies aimed at countering potential corporate risks, in order to ensure compliance not only with the law, but also with internal provisions and procedures.

In fact, the violation of the principles set out in the Code and in the procedures indicated in the internal controls compromises the relationship of trust between the Company and its directors, employees, consultants, collaborators in various capacities, customers, suppliers, commercial and financial partners.

As a consequence, such violations will be immediately prosecuted by MetalFar Prodotti Industriali S.p.A. in an incisive and timely manner, through the adoption of adequate and proportionate disciplinary measures.

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 MetalFar Prodotti Industriali S.p.A. Depending on the seriousness of the conduct of the person involved in one of the illegal activities provided for by the Code, MetalFar Prodotti Industriali S.p.A. will take the appropriate measures without delay.

In any case, MetalFar Prodotti Industriali S.p.A. also reserves the right to take all actions it believes they are appropriate to compensate for the damage suffered as a result of conduct in violation of the Code of Ethics.

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