

This Code of Ethics constitutes an integral part of the Organisational, Management and Control Model envisaged in article 6 of Legislative Decree 231/01 on "Regulations on Corporate Responsibility of Legal Entities, Companies and Associations, including those without legal status pursuant to Article 11 of Law 300 of 29 September 2000".

1. FOREWORD

Perozeni Srl engages in the production of mid-heavy metal framing since 1975, providing high-precision mechanical processes on large products while guaranteeing a high level of satisfaction of customers and the company's soundness.

This Code of Ethics represents the values and standards of conduct to which the company and the recipients listed hereafter must abide by.

Our company undertakes to promote the dissemination and respect of the principles of this Code of Ethics while complying with the rules of conduct defined therein.

The recipients of the provisions of the Code of Ethics are: all employees covering any role and qualification, as well as collaborators, directors, consultants, agents, customers, suppliers, contractors and any person working on behalf of our company.


It is the duty of all recipients to know about the contents of this Code of Ethics and observe the rules and principles thereof.





2. GENERAL PRINCIPLES

Perozeni S.r.l. runs its business abiding by the following general principles:

<p><u>Correctness and honesty</u></p>	<p>Fraudulent dealings and conduct are strictly forbidden, as well as acts of corruption, favouritism and generally conduct contrary to laws and regulations of the sector, internal rules and the provisions of this Code of Ethics.</p>	
<p><u>Impartiality</u></p>	<p>The company avoids any sort of discrimination against any of its stakeholders based on the knowledge of personal or sensitive data.</p>	

<p><u>Compliance of worker's fundamental rights</u></p>	<p>Perozeni S.r.l. complies with human rights and observes and shares the principles set out by the International Labour Organisation.</p> <p>The Company honours workers' rights to appoint own representatives with the purpose of promoting constructive discussion.</p> <p>The Company declines the intentional use of forced labour, minor labour and strictly complies with the minimum age requirements for work in compliance with applicable regulations. Moreover, the Company favours work placement of disabled persons in order to promote social integration. Dealings with workers are regulated by the National Collective Labour Agreement.</p>	
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<p><u>Compliance of laws</u></p>	<p>Complying with laws is for our Company a fundamental value in running our business.</p> <p>It is forbidden to engage in any conduct whatsoever that may be considered an offence, in particular in compliance with Legislative Decree 231/01, as amended and supplemented.</p>	
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<p><u>Compliance of corporate rules</u></p>	<p>The Company has defined corporate rules in full compliance with workers' rights, applicable regulations and the national collective labour agreement. Said rules (contained in this Code of Ethics, in the disciplinary code, etc.) constitute an implementing instrument of the Organisational Model and a means to allow the recipients to work in a consistent manner while emphasising the correctness of their own conduct.</p>	
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<p><u>Workplace health and safety protection</u></p>	<p>The Company has pursued a strategy for continued growth and improvement of its Workplace Health and Safety Management for many years now by actively involving all those interested (management, directors, employees, collaborators, consultants, suppliers, contractors, etc.).</p> <p>The Workplace, Health and Safety Management System conforms to the Guidelines set out by UNI INAIL which is an operating instrument adopted by the Company.</p>	
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Perozeni S.r.l. adopts all general protection measures envisaged in Article 15 of Legislative Decree 81/08, as amended and supplemented thereto.

In particular:


<p><i>a) the assessment of all health and safety risks</i></p> <p><i>b) the planning of preventive measure that can take into account the productive and technical conditions of the company, the effect of environmental factors and the work organisation</i></p> <p><i>c) the removal of risks and where not possible, their reduction to a minimum in relation to the knowledge gained based on the technical progress</i></p> <p><i>d) the compliance of ergonomic principles in the work organisation, in the granting of work areas, in the selection of equipment and in the definition of work and production methods, particularly with the purpose of reducing the health effects of monotonous and repetitive work</i></p> <p><i>e) reduction of risks at the source</i></p> <p><i>f) replacement of what is dangerous with what is not or is less dangerous</i></p> <p><i>g) minimising the number of workers who are or who can be exposed to a risk</i></p>	
<p><i>h) limited use of chemical, physical or biological agents in the workplace</i></p>	

<p>n) <i>proper information and training for workers</i></p> <p>o) <i>proper information and training for executives and those in charge</i></p> <p>p) <i>proper information and training for workers' health and safety representatives</i></p> <p>q) <i>proper training for workers</i></p> <p>r) <i>participation and consultancy of workers</i></p> <p>s) <i>participation and consultancy of workers' health and safety representatives</i></p> <p>t) <i>planning of measures deemed appropriate to guarantee the improvement over time of safety levels, even by adopting codes of conduct and good practices</i></p>	
<p>u) <i>the emergency measures to be implemented in case of an emergency, fire, evacuation of workers and serious or immediate danger</i></p>	
<p>v) <i>the use of warning and safety signals</i></p>	
<p>z) <i>regular maintenance of areas, equipment, systems with special emphasis on safety devices in compliance with the instructions of the manufacturers.</i></p>	

<p><u>Workplace protection</u></p>	<p>Perozeni S.r.l. shares principles of respect and protection for the environment, not only with respect to applicable laws, but also in consideration of the rights of future generations. This principle is implemented in the prevention and reduction of any pollution to a minimum, the proper management of waste, possibly involving specialised and certified entities in optimising the use of any energy resource and sensitising and informing own collaborators.</p>	
<p><u>Protection of privacy and data</u></p>	<p>The Company guarantees the processing of data held pursuant to Legislative Decree 196/03, as amended and supplemented.</p>	
<p><u>Corporate Goals and Policies</u></p>	<p>Our company has defined its own general goals inspired by the principles described in this document within the scope of its own Management Systems. The preparatory instrument to reach said goals lies in the Corporate Policy which is disseminated at all levels. The Company considers health and safety protection to be an integral part of its activities and as strategic commitment with respect to its more general aims, therefore the Policy and Goals include said inspiring principles.</p>	
<p><u>Correctness in records</u></p>	<p>The Company's Management Systems are based on the correctness of records that are prepared and kept at all levels and in all areas. It is essential for each person to ensure the exactness of his/her own records in order to implement the Organisational Model effectively.</p>	

All those who carry out any activity for our Company or on behalf of our Company, whether directly or indirectly, are bound to observe said principles.

3. RULES OF CONDUCT

<p><u>CUSTOMERS</u></p>	<p>Among its general goals, the Company has chosen "Customer Satisfaction".</p> <p>Said goals can be reached by maintaining relationships with honesty, transparency, collaboration spirit and with respect by all those involved. It is therefore necessary for each collaborator of Perozeni S.r.l. to personally take the effort to provide constructive support in all corporate processes that have an effect on "Customer Satisfaction".</p>	
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<p><u>SUPPLIERS AND PARTNERS</u></p>	<p>Our Company searches and selects own suppliers and partners based on the guidelines set out in its Management Systems with the purpose of pursuing the end goal of "Customer Satisfaction" in compliance with applicable laws, product technical requirements and principles of competitiveness and proper operation of the Company. It is therefore essential for each collaborator of the Organisation to find a relationship of mutual collaboration based on principles of free competition, transparency and punctuality in order to optimise the satisfaction level of product and service requirements.</p>	
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CORPORATE STAFF AND
COLLABORATORS

Our company is aware of the importance and value of its employees as essential wealth for the Company. Perozeni S.r.l. strives to create an environment suitable for the complete involvement of staff to pursue their own goals. Each collaborator must be aware of their own duties, own personal goals and of how their own conduct can affect reaching corporate goals. Our motto is to "Drive everyone's efforts in the same direction". Enhancement of human resources takes place by following a path for professional growth within a working environment growing in terms of quality. The Company strives to involve the entire corporate organisation in the management of workplace, health and safety.



4. IMPLEMENTATION METHODS AND CONTROL

Availability of Code of Ethics

The Code of Ethics can be viewed from the company's website or at the branches in hardcopy or in digital format for all recipients. The Code of Ethics is disseminated to all staff during periodic training meetings and is also distributed to external partners during the initial phases of any collaboration contract with our company.

Supervisory body

Perozeni S.r.l. has set up a Supervisory Body in order to guarantee an independent and autonomous monitoring process with the effective application of the Organisational Model which constitutes an integral part of this Code of Ethics.

Reporting violations

Anyone who becomes aware of conduct that can be considered a breach of the rules of this Code of Ethics must report it to the Supervisory Body. Reporting should be kept confidential and could be forwarded by post to: **Supervisory Body - Perozeni Srl - Via Lorenzi, 44 - 37021 Corbiolo di Bosco Chiesanuova (VR).**
or to the following email address: odv@perozeni.it

Sanctions

In case of ascertained breaches of the rules, the principles or values set out in this Code of Ethics, the Company's Management shall adopt the proper disciplinary procedures in compliance with applicable laws, the applicable national collective agreement, the worker's charter (Law 300/70), the Disciplinary Code with the respective Internal Disciplinary System, in order to ensure the effective implementation of the Organisational Model. A breach of the rules of this Code of Ethics may result in:

- the application of sanctions envisaged by the collective national agreement to employees;
- measures that can go from a simple warning to the annulment of the role for those in top management;
- the adoption of disciplinary measures for other recipients such as the application of penalties pursuant to the contract until the resolution of the contract due to just cause.

Amendments and supplements

The roles of the Management Body along with the Supervisory Body is to keep this Code of Ethics up-to-date depending on the needs to ensure the effectiveness of its implementation. Moreover, the Management Body must ensure that all recipients are informed on time. The revision status can be seen from the revision index in the document itself.