LABOMAR

Code of Ethics

(art. 6 Italian Legislative Decree
no. 231/01)
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LABOMAR S.P.A.
Via Nazario Sauro, 35/ I Istrana

Title Code of Ethics
Drawn up by LABOMAR
Approved by Board of Directors
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LABOMAR

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1 _ MISSION AND VALUES

This Code of Ethics is based on our mission and values.
Our mission defines our place in the world, the value we offer our customers and the markets and the commitments we have made to all those involved in our business.
Our values guide us and define the rules of behaviour which must be adhered to by colleagues, customers and suppliers.
Our mission and values are the foundation on which all our corporate decisions are made.
Although this Code of Ethics touches on many specific situations, it cannot foresee them all, so Labomar's mission and vision are intended to be a source of inspiration and a benchmark for all situations which are not specifically referred to in its Code of Ethics and act as a guide to help determine the behaviour to adopt in the conduct of its business. This Code of Ethics is therefore a tool to implement Labomar's ethical-social and environmental responsibility and sets out its rights, duties and responsibilities towards all stakeholders.

The company's mission is to work together with passion to design and manufacture products and services for our customers' well-being, while respecting the environment. We are courageous in our innovation and proud to belong to one big family.

The values the company lives and works by are:
- Customer orientation
- Team spirit
- Passion for excellence
- Well-being and sustainability
- Coherence

This Code of Ethics is an integral part of the company's Organisational, Managerial and Control Model in accordance with articles 6 and 7 of Italian Legislative Decree no. 231/2001.

2 _ PRINCIPLES OF BEHAVIOUR

2_1 Fairness and honesty
Labomar operates in compliance with Italian law and, as applicable, with the legislation in force in the other countries in which it operates, as well as in accordance with professional ethics.
Under no circumstances shall the pursuit of Labomar's interests justify conduct that does not comply with the principles of fairness, honesty, respect and professionalism.
Labomar is aware of the importance of the rights and merits of others, of the moral and cultural value of every person, of respect towards people and the things around us, of respect for society and the rules of common decency, as well as the intellectual potential of each and every one of us.
It therefore does not allow any kind of benefit, whether received or offered, that could be construed as a way of influencing the independence of judgment or conduct of those involved.
Practices of corruption, illegitimate favours, collusive behaviour, solicitation, whether direct or through third parties, of personal benefits for oneself or for others, are strictly prohibited.
Acts of commercial courtesy, such as gifts or hospitality, are permitted when they are of modest value and do not compromise the integrity or reputation of either party and cannot be construed, by an impartial observer, as intended to gain improper benefits.

2_2 Conflict of interest
Every aspect of Labomar's business is carried out to avoid conflicts of interest, whether real or only potential, which may interfere with its ability to make impartial decisions in the company's best interests and in full compliance with the rules of this Code.

The following situations are examples of conflicts of interest:
- economic and financial interests of an employee and/or their family in their capacity as suppliers, customers and competitors;
- use of their position within the company or of information acquired in their work in such a manner as to create a conflict between their personal interests and those of the company;
- carrying out any kind of work at customers', suppliers' or competitors' premises;
- acceptance of money, favours or benefits from people or companies which are in or intend to enter into a business relation with Labomar.

2_3 Free competition
Labomar believes in free and fair competition, a determining factor for the growth and continuous improvement of the company.

2_4 Human rights
Labomar believes in fundamental human rights and respects the dignity of all human beings, in accordance with the Universal Declaration of Human Rights drawn up by the United Nations. Labomar therefore undertakes:

- Not to use or promote child labour. 'Child labour' is defined as any work performed by children under the legal age, which can vary from country to country;
- Not to use any kind of forced labour, slavery or bonded labour and refrain from any conduct which resorts to threats, use of force or any form of coercion, abduction, intimidation, reprisal or abuse of power to exploit anyone;
- To avoid any kind of discrimination based on age, racial and ethnic origin, nationality, political opinions, religious beliefs, gender, trade union membership or health conditions;
- To comply with labour laws in force regarding working hours and remuneration, respecting regulations on the national minimum wage and the respective employment contracts in the sector, also in terms of working hours, overtime and compensation required by law;
- To respect employees' right to join any trade union without fear of retaliation.

2_5 Professionalism and enhancing the value of resources
Labomar is committed to innovating and continuously improving its products and processes, developing a reputation for excellence on the market. Labomar undertakes to guarantee full and productive employment and decent work for everyone, while fostering the diversity and inclusion of its employees.
The company encourages all its employees to strive for efficiency and efficacy, encouraging a dynamic attitude and passion for growth.
Labomar guarantees an adequate degree of professionalism in the execution of the tasks it entrusts to its employees, so they are aware and have a full understanding of their role within the company.
It considers focusing on results, meeting deadlines and prompt intervention and response important.
To this end, it works to develop the skills of its human resources, providing them with appropriate training and opportunities for further education and growth, encouraging improvement through continuous education, innovation and openness to change.

2_6 Confidentiality
In compliance with current legislation, Labomar guarantees the confidentiality of the information in its possession.
Labomar workers are forbidden to use or disclose “confidential” information for purposes other than carrying out their professional activity.
All company workers are required to sign a special agreement, agreeing they will not disclose confidential information they may become acquainted with in the performance of their work.

2_7 Protecting workers’ health and safety
All Labomar employees, irrespective of the kind of contractual relationship, are ensured dignified working conditions in safe and healthy workplaces.
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- considers compliance with legislation and agreements regarding the health and safety of workers to be a priority;
- considers the management of the health and safety of its workers an integral part of the overall management of the organisation;
- promotes the involvement, cooperation and collaboration of all company resources in matters regarding the health and safety of its workers;
- guarantees the necessary resources to effectively deal with problems regarding health and safety in the workplace.

2_8 Environmental protection
Labomar is committed to the protection of the environment and the local area. All its decisions are made to ensure compatibility between its economic initiative and the needs of the environment, in compliance with current legislation. In particular, it supports the development of the communities it works in, contributing to their economic and social well-being and respecting the rights of the local people and the importance of their traditions, culture and social heritage. To this end, Labomar undertakes to act responsibly towards the environment when conducting its business, striving, wherever possible, to minimise the negative impact of its activities.

2_9 Use of the company’s intellectual and material assets
The intellectual and material assets of the company, including its IT tools, must be used in compliance with general rules, their intended use and IT Rules and in such a way to protect their conservation and functionality, avoiding use that is in violation of any law.

3 _ GUIDELINES FOR RELATIONS WITH COUNTERPARTS

3_1 Relations with customers
All Labomar activities aim to satisfy and safeguard its customers, paying special attention to any requests that may improve the quality of the products and services it offers and striving to find shared solutions at all times.
The information and documentation given to acquired or potential customers about the products and services it offers or the experiences or references held by Labomar are truthful, accurate and comprehensive to enable its customers to make informed decisions.
All negotiations conducted directly by Labomar staff or through its sales network, contractual relationships and communications issued by Labomar are inspired by the principles of ethics, honesty, respect, professionalism and transparency and based on maximum collaboration.
All those who supply and/or sell goods and/or services on behalf of Labomar are required to comply with these principles, as well as all those, in general, who represent the company.

3_2 Relations with the market and consumers
Labomar believes in free and fair competition and focuses its actions on achieving competitive results that reward ability, experience and efficiency.
Labomar undertakes to respect the right of consumers not to receive products which are harmful to their health and physical integrity and to be given full information about the products offered.

Any action aimed at altering the conditions of fair competition is contrary to Labomar's policy and is prohibited for any individual acting on its behalf.

In no event may the pursuit of the company's interests justify conduct by the company's top management or co-workers that does not comply with the laws in force and the rules of this Code.
Labomar – as far as it falls within its competence as manufacturer – guarantees customers compliance of all its products with mandatory statutory regulations.

3_3 Relations with partners and suppliers
Thanks to their collaboration, Labomar's partners and suppliers make the accomplishment of the company's purpose possible.
The company undertakes to:

- develop fair and cooperative relationships with its partners and suppliers which are based on dialogue and are aimed at allowing the mutual exchange of expertise and information and promoting the creation of shared value;
- ensure that every company in possession of the necessary requirements has the opportunity to compete to earn the chance to supply the company, adopting objective evaluation criteria in the selection process and following stated, transparent methods;
- abide by the contractually agreed conditions.

3_4 Relations with workers
Labomar recognises the importance of its employees and co-workers as one of the key factors in the achievement of its corporate objectives and adopts procedures and methods of selection, development, evaluation and training to ensure the utmost fairness and equal opportunities without discrimination on the grounds of gender, race, age, sexual orientation, religious beliefs or another other factor. People are hired according to their experience, attitude and expertise. Recruitment is carried out exclusively when expected profiles and required profiles match.
The company undertakes to give all its workers the same opportunities, making sure everyone enjoys fair treatment based on strictly professional criteria of merit for any decision concerning their professional life, without discrimination.
The company encourages collaboration and teamwork based on transparency, trust, loyalty and mutual support within the company.
Labomar manages all its activities in accordance with mandatory legislation on the conditions of the work environment, undertaking to provide a dignified and respectful workplace for everyone.
The company is committed to promoting and consolidating a culture of safety, developing awareness of risks and knowledge and compliance with current legislation on prevention and protection, promoting responsible behaviour in all its workers. It also undertakes to create a stimulating and unifying working environment and encourage all its workers of take care of their well-being and health.
Labomar expects all its employees to cooperate to maintain a working climate that is based on respect for individual dignity, honour and reputation and will take measures to prevent offensive or defamatory behaviour between workers and any conduct that does not respect people, roles or the rules.

3_5 Relations with the public administration and other external entities

Labomar cooperates actively and fully with the authorities through its people and structures.

All relations with the authorities and the public administration are based on the principles of fairness, transparency, collaboration and non-interference, respecting their mutual roles and corporate procedures.

It is strictly forbidden to make, bring about or encourage false statements to the authorities.

Labomar does not support events or initiatives whose purpose is exclusively or prevalently political and refrains from any direct or indirect pressure towards political representatives.

4 _ IMPLEMENTATION

In compliance with current legislation and within the scope of planning and managing corporate activities aimed at efficiency, fairness, transparency and quality, Labomar adopts organisational and management measures aimed at preventing unlawful conduct or conduct that goes against the rules of this Code of Ethics by any person acting on behalf of the company.
Any violations of this Code of Ethics may be reported directly by recipients in compete confidence to the company's supervisory body.

The procedures for reporting and verifying violations are established to protect the identify of the person making the report to prevent reprisal of any kind towards them, but also to guarantee assessment of the actual facts.

5 _ SANCTIONS

Everyone needs to collaborate to ensure this Code of Ethics is correctly and effectively implemented.
Violation of the provisions of this Code of Ethics will constitute a disciplinary offence and a breach of the obligations of the employee, manager or professional collaboration contract, with all the consequent legal and contractual effects.
This document is signed for acknowledgement and acceptance by all workers (employees or otherwise) of the company.