

1. General terms

The corporate policy of **Redaelli Ricambi S.r.l.** is to operate in observance of applicable laws and regulations, whether national or international, and in observance of this Code of Ethics.

All employees of **Redaelli Ricambi S.r.l.** have an obligation to comply with this Code of Ethics

The principles on which the corporate Code of Ethics is based are the following:

- ethically correct and legal behaviour of the company and its various points of contact;
- loyalty of the employees and staff to the company;
- professional, courteous and respectful relationship between colleagues, whether senior or junior;
- professionalism and professional diligence;
- respect for the environment and for the health and safety of employees and staff.

Redaelli Ricambi S.r.l. works to give concrete form to the values and principles contained in the code, assuming responsibility for them both inside and outside the organisation by strengthening trust, cohesion and the corporate spirit. It is therefore committed to training/information operations on the content of the code with the objectives of:

- promoting and strengthening the corporate culture around the recognised values;
- disseminating the rules, procedures and practices to follow;
- broadening the consensus on the basic principles of this code.

The following are the ethical standards of conduct that the company intends to pursue:

- equity and equality in the treatment and recognition of the value of human resources;
- diligence, transparency, honesty, confidentiality and impartiality in carrying out the company operations;
- protection of people and the environment.

The company also decided to further strengthen the company's operations by obtaining ISO 9001 and IATF16949 Quality Certifications placing particular attention on the company organisational and management aspects with punctual references to the in-house resources and the various stakeholders outside the company, such as the customer and the supplier.

2. Rules and standards of conduct

Redaelli Ricambi S.r.l. undertakes to guarantee:

- **IMPARTIALITY:** offering equal employment opportunities to all employees and staff based on professional qualifications and performance ability, without discrimination based on race, religion, opinion, nationality, sex, age or physical and social conditions
- **WORK ENVIRONMENT:** guaranteeing that in internal and external employment relationships, there is no occurrence of sexual molestation and no conduct or initiatives are adopted which create a work environment that is intimidating, hostile or isolating for individuals or groups of employees which interfere negatively with the execution of the work performance of others or that prevent the employment and/or career prospects of others for mere reasons of personal competitiveness
- **DEVELOPMENT:** developing the abilities and skills of each employee and staff with training and updating operations
- **RESOURCE VALUE:** guaranteeing merit and skill based equal treatment
- **PRIVACY:** protecting employee and staff information generated or acquired inside of outside the company and activating all useful measures to prevent improper use of said information;
- **HEALTH AND SAFETY:** promoting and protecting the health and safety of its employees and staff, enforcing the relevant prevailing legislation.
- **ENVIRONMENT AND SUSTAINABILITY:** compliance with environmental standards in every production process, promoting sustainable and responsible development; The production processes are constantly monitored and updated in order to reduce the environmental impact with particular attention to water and energy savings, the reduction of emissions and the utmost attention to waste recycling.

The employees undertake to observe the following regulations:

- **RESPONSIBILITIES:** providing performance as contracted consistently with the tasks, goals and responsibilities assigned, without delegating the fulfilment of operations or the decisions for which he or she are responsible to other employees or staff;
- **RESPECT:** adopting behaviour that is respectful and considerate of others, not working while under the influence of alcohol, narcotics or the like and not consuming or providing similar substances during the performance of work;
- **CORPORATE CLIMATE:** contributing to the creation of a professional climate in which all colleagues feel positively involved in achieving the corporate objectives;

- **CONFIDENTIALITY:** using utmost caution and attention in using information that is not public domain stemming from carrying out their duties. The information and any other material obtained during performance of their work are the property of the company. The employees undertake not to disclose, use or communicate to third parties information and/or any other type of news, documents, data, etc.;
- **CONFLICT OF INTEREST:** avoiding all situations and activities in which a conflict of interest may arise between personal financial activities and the duties covered in the company or interests of the company itself. If situations of conflict or situations of potential conflict should occasionally arise anyway, utmost communication and transparency is required with the relevant manager or the function point of reference for any appropriate measures;
- **GIFTS:** accepting or offering, directly or indirectly, acts of business courtesies such as gifts, payments and benefits, only when they are such not to be interpreted as for the purpose of inappropriately acquiring advantages for oneself or for the company. An employee or staff who receive/offer said gifts that cannot be ascribed to normal, professional, courteous relations must inform his or her manager or the function point of reference directly and refuse;
- **HEALTH AND SAFETY:** participating in the process of risk prevention, safeguarding the environment and protecting their own, colleagues' and third parties' health and safety.
- **ENVIRONMENT AND SUSTAINABILITY:** actively contribute to the reduction of energy consumption, water consumption, emissions and waste recycling, committing to facilitate the recycling of materials. They are also required to report any shortcomings or inefficiencies found to the Management.

3. Guiding criteria for policies on third parties

- **CUSTOMER AND SUPPLIER RELATIONS:** Each employee is bound to carry out his or her duties with the goal of achieving maximum customer satisfaction. When required, each recipient is bound to providing assistance and information in a courteous, polite, professional and thorough manner.
- **RELATIONS WITH PUBLIC ADMINISTRATION OR EXTERNAL BODIES:** The assumption of commitments with Public Administration and/or external bodies is the responsibility solely of the appointed company functions.
- **RELATIONS WITH POLITICAL OR TRADE UNION ORGANISATIONS:** **Redaelli Ricambi S.r.l.** does not distribute contributions, direct and indirect and in any form whatsoever, to political parties, movements and trade union organisations, or to their representatives and candidates.

4. Violation of the regulations of the code of ethics

The regulations in the Code of Ethics integrate the conduct that the employee and the legal representatives of **Redaelli Ricambi S.r.l.** are bound to observe under prevailing civil and criminal legislation.

If an employee becomes aware of illegal or unethical situations, they must immediately notify their manager or the Board of Directors through the following channels:

- verbal communication
- Ordinary mail (Redaelli Ricambi Srl, via per Dolzago 59, 23848 Oggiono (LC))
- Email (redaelli.ricambi@frsteer.it)
- FAX Number (0341 577340)

5. Means of implementation

The responsibility for applying the Code of Ethics is entrusted to the Board of Directors which must:

- ensure maximum distribution of the Code of Ethics to all the recipients;
- monitor to ensure that the Code of Ethics and the concrete conduct of the employees and staff is consistent and therefore ascertain any news of violation, involving the recipients and the involved functions in the necessary measures; Redaelli Ricambi srl guarantees that employees who report any violation of the code of ethics will not be subject to any form of reprisal ("whistle-blowing policy").
- check the adequacy of the Code and the rules introduced by it for the prevention of conduct unwanted by the company;
- carry out analysis on the maintaining over time of the requirements of soundness and functionality of the Code of Ethics and the rules of conduct introduced with it;
- update the Code to always keep it adequate for the company.