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ARMETTA NICOLETTA SRL
SINGLE PERSONAL

Via del Progresso 29
36010 Monticello CO (VI)


CORPORATE CODE OF ETHICS

<i>Monticello CO(VI), 09/29/2023</i>	<i>Approved by the Sole Director Mr. Diego Segato.</i>
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1. PREMISE

This Code of Ethics must be understood as the founding charter of the moral rights and duties of **ARMETTA NICOLETTA SRL**. It identifies the policies and rules of general behavior that are intended to safeguard company activities, essential to prevent irresponsible or illicit conduct by those acting on behalf of or in the name of the company.

The recipients of this Code of Ethics are required to respect the principles contained therein and to protect, with their behaviour, the good repute, the image of **ARMETTA NICOLETTA SRL** and the integrity of its human and economic assets.

The Code of Ethics complements the current legislation and the National Collective Labor Agreement applied in the company. The company undertakes to update the contents if the context, the reference legislation or the company organization make it appropriate.

The top management is responsible for any modification and/or integration of this Code of Ethics and any possible update will be adopted with specific determination.

The company top management, employees, collaborators, suppliers, partners, all those who directly or indirectly, on a stable or temporary basis establish relationships or operate in its interest and, in general, must be inspired by the values and principles of the Code of Ethics. , all third parties who enter into relationships with **ARMETTA NICOLETTA SRL** in the context of work activities.

2. PURPOSE AND METHODS OF IMPLEMENTATION


The purposes of this Code of Ethics are:

- encourage and incentivize behavior deemed virtuous and prohibit conduct that does not comply with the principles indicated, regardless of what is provided for at a regulatory level and therefore of the criminal consistency of the conduct itself;
- disseminate the values of correctness, loyalty and integrity that must guide the actions and behaviors of the individuals who work for the company;
- spread a culture of legality;
- identify and declare the values and ethical principles that underlie the company's activity and relationships with customers, suppliers, employees, public bodies and any other entity involved in the activity of **ARMETTA NICOLETTA SRL** ;
- formalize the commitment to behave in compliance with the ethical principles of fairness, equality, protection and enhancement of the person, transparency, honesty and anything else subsequently specified.

Consistently, the recipients of the Code of Ethics must behave in compliance with the principles and rules set out in this Code of Ethics in the pursuit of corporate objectives and in all relationships with **ARMETTA NICOLETTA SRL** .

All recipients, within the scope of their functions, are responsible for the correct application of this Code of Ethics.

ARMETTA NICOLETTA SRL undertakes to verify the Code of Ethics to evaluate its adequacy over time and any additions also in light of concrete experience.

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3. RECIPIENTS OF THE CODE OF ETHICS

All subjects who work to achieve the company objectives, whether they are in top positions or subordinates, are required to comply with this Code of Ethics.

The obligations of conduct envisaged by the same are extended, insofar as they are compatible, to all collaborators and external consultants, suppliers, and to anyone who has relationships with **ARMETTA NICOLETTA SRL** with any type of contract or assignment. Each recipient must actively collaborate in the implementation of the company Code of Ethics.

4. DISSEMINATION AND KNOWLEDGE OF THE CODE OF ETHICS

To this end, **ARMETTA NICOLETTA SRL** undertakes to promote and disseminate adequate knowledge of it, as well as to ensure that the provisions contained are respected by intervening, if necessary, with the corrective or disciplinary actions deemed most appropriate.

The Code of Ethics is brought to the attention of workers and all those with whom the company maintains relationships through adequate communication tools (for example, posting on the company noticeboard, publication on the company website, training sessions, specific communications, etc.)

5. CORPORATE VALUES

ARMETTA NICOLETTA SRL is inspired by the following values - to be considered binding for the recipients of the Code of Ethics - and will not begin or continue any relationship with anyone who does not intend to align themselves with these principles.

Every employee of **ARMETTA NICOLETTA SRL** must therefore undertake to comply with this Code of Ethics; this commitment and the sharing of the following values is also intended to be extended to subjects external to the corporate structure (consultants, suppliers, partners, etc.).

5.1. Legality, honesty, correctness, respect, loyalty, confidentiality


ARMETTA NICOLETTA SRL operates in compliance with current laws and regulations, professional ethics and internal procedures and for this purpose ensures an adequate training and awareness program. The pursuit of corporate interests can never justify conduct contrary to the principles of legality, correctness and honesty.

The recipients of the Code of Ethics regulate their conduct in a professional and responsible manner in order to avoid potential conflicts, ensuring correctness, collaboration, loyalty and mutual respect.

5.2. Enhancement of human resources/equal opportunities

In order to enhance human resources, **ARMETTA NICOLETTA SRL** undertakes to guarantee:

1. respect for the principle of equal opportunities, adopting the measures necessary both to remove the obstacles that actually prevent the realization of such equal opportunities, and to promote female employment and achieve substantial equality between men and women in the workplace ;

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2. admission to professional development opportunities - compatibly with the company's economic resources - without discrimination;
3. support for employees in conditions of family, personal or social disadvantage;
4. respect for the person and individual dignity, rejecting any manifestation of violence and any form of exploitation of the individual;
5. the protection of each employee from offensive, harassing or unwanted behavior with a sexual connotation, from moral or psychological violence, from discrimination based on sexual orientation, race, religion, personal opinions, political beliefs, age, disability.

Finally, **ARMETTA NICOLETTA SRL ensures:**

- ✓ salaries in line with national and territorial collective bargaining;
- ✓ compliance with the rules on working hours, leave and holidays;
- ✓ the protection of the dignity of workers which in no case may be violated by acts or behaviors that may constitute harassment or violence.

ARMETTA NICOLETTA SRL encourages employees to collaborate in maintaining a work environment in which everyone's dignity is respected and interpersonal relationships are encouraged, based on principles of equality and mutual correctness, also through information and training initiatives inside the company.

In relation to this last point, **ARMETTA NICOLETTA SRL** recalls the Regional Agreement transposing the Framework Agreement of the European social partners on harassment and violence in the workplace, also signed by Confartigianato Imprese Veneto.


Any violations of the worker's dignity are to be considered a disciplinary offense and as such may be sanctioned.

5.3. Protection of health and safety at work

ARMETTA NICOLETTA SRL , considering human capital a strategic resource and the safety and physical and moral integrity of workers a fundamental value, undertakes to promote compliance with current regulations and observance of company provisions regarding safety and hygiene at work through constant training activities, which aim to spread and consolidate a culture of safety and health at work, developing awareness of risks and promoting responsible behavior on the part of all collaborators, respectful of their own safety and that of others.

ARMETTA NICOLETTA SRL promotes and implements every initiative aimed at eliminating risks and, where this is not possible, minimizing risks and removing the causes that could jeopardize the safety and health of workers, carrying out interventions of a technical and organizational nature, also through the introduction of a risk and safety assessment and management system, in order to guarantee that working conditions take place in safe environments and by making efficient and adequately maintained instruments and equipment available to its workers.

The recipients of the Code of Ethics undertake to: take care of their own safety and health and that of other people present in the workplace who may be affected by the effects of their actions or omissions, in accordance with their training and instructions and means provided by the employer; report to the employer or the person in charge any anomalies and/or malfunctions found in the use of work equipment and protective devices and any other dangerous conditions of which one becomes aware; promote and implement any reasonable initiative that can minimize risks or remove causes that could jeopardize the safety and health of workers, customers, suppliers and, more generally, third parties who carry out their activities at the Company.

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5.4. Environmental Protection

As part of its activity, **ARMETTA NICOLETTA SRL** undertakes to operate while respecting the protection of the environment, with the intention of ensuring full compatibility of its activities with the territory and the surrounding environment.

It undertakes to consider the environmental impact of new activities and new production processes and, in implementation of the values of legality and prudence, condemns any form of behavior that may put at risk not only the safety and health of people but also the integrity and healthiness of the environment and territory.

The recipients of this Code of Ethics undertake in particular to: use natural resources in a responsible and conscious manner; to take care of the health of the environment, which could be damaged by the consequences of their actions or omissions, in accordance with their training and the means provided by the employer; to report potential or obvious risk situations or dangerous conditions or anomalies of which they become aware, using their sensitivity and experience and the diligence of a good father of a family, to allow **ARMETTA NICOLETTA SRL** to intervene promptly in risk prevention **and** protection of the environment and territory.

5.5. Protection of the psycho-physical integrity of workers

Any derision towards individual workers or groups of workers for conditions of mental or physical inferiority or cultural, religious or sexual orientation diversity is prohibited. **ARMETTA NICOLETTA SRL** considers any act or behavior that constitutes harassment or violence - physical or moral - in the workplace to be unacceptable and undertakes to adopt adequate measures against the person or persons who carried them out.

Harassment at work means unwanted behaviour, carried out for reasons also connected to sex and with the aim of violating the dignity of a worker and of creating an intimidating, hostile, humiliating or offensive climate.


Harassment occurs when one or more individuals repeatedly and deliberately experience threats and/or humiliation in work circumstances. The fact that sexual harassment is accompanied by implicit or explicit threats or blackmail by hierarchical superiors or people who can influence the establishment, development and termination of the employment relationship should be considered an aggravating circumstance.

Violence at work refers to those situations in which staff are abused, threatened or attacked in circumstances of work - including commuting or business travel or travel - with explicit or implicit consequences on physical or psychological health, safety and well-being.

Harassment and violence can be exercised both by superiors and by workers, with the aim and effect of violating the dignity of the person concerned, harming health and/or creating a hostile working environment. The company believes that harassing behavior and violence suffered in the workplace should be reported.

Every person, in the work environment, must feel free to say that they find inappropriate behavior and communicate the reasons (which must not be specious) and expect others to respect them so that any conduct that offends someone involuntarily can be promptly corrected.

Consistently, all employees must behave in an appropriate manner that is not harmful

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for the dignity of the person and collaborate for a peaceful and safe environment.

If foreign workers are hired, it will be necessary to check the residence permit which can never be missing or expired.

ARMETTA NICOLETTA SRL rejects any attempt to propagate ideas based on racial supremacy or hatred, or any activity aimed at instigating or committing acts of marginalization for racial, national or religious causes or for personal, political or trade union beliefs.

Staff must refrain from demonstrating racist or xenophobic conduct, also avoiding participation in associations or organizations in general that have the aim of encouraging discrimination for racial, national, religious, political or trade union reasons.

What is established for employees is also extended to collaborations comparable to employed work.

6. PRINCIPLES OF BEHAVIOR

6.1. Conflicts of interest

In general, situations or behaviors that may appear to be in conflict of interest with **ARMETTA NICOLETTA SRL** or that may lead to the pursuit of a personal interest by exploiting one's corporate role must be avoided.

The following situations, indicated by way of example and not limited to, may constitute a conflict of interest: receiving money or benefits from people or companies that are or intend to enter into business relationships with the Company; have family or personal interests that can influence the company's strategic choices and the methods of implementing them; take advantage, even through a third party, of business opportunities of which one becomes aware thanks to the performance of one's corporate functions or the work carried out on behalf of the company.

Situations, even potential ones, of conflict of interest must be promptly communicated to top management, so as to allow the company to make an appropriate assessment.


6.2. Corruption and incitement to corruption

It is strictly forbidden, even through a third party, to offer, promise or give undue money or other benefits so that a person carries out or omits an act in violation of the obligations inherent to his office or the obligations of loyalty, even when the offer or promise is not accepted.

Conversely, it is strictly forbidden to solicit or receive, for oneself or for others, even through a third party, money or other benefits that are not owed, or to accept the promise thereof, to carry out or omit an act in violation of the obligations inherent to one's office or the obligations of loyalty.

6.3. Prohibition of discrimination

As already stated (point 5.2) **ARMETTA NICOLETTA SRL** is committed to guaranteeing the principle of equal opportunities at work. Hence the need for equal treatment of personnel, as any form of discrimination, direct or indirect, is prohibited. Therefore, in all phases of the employment relationship (selection, hiring, training, promotions and remuneration) any form of marginalization based on sexual orientation, race, nationality, age, religion, personal opinions, political beliefs, disability, status is prohibited. health, marital status, personal conditions. In fact, **ARMETTA**

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NICOLETTA SRL believes that people should have the same opportunities to access work, promotions, training and remuneration; these opportunities must be accessible exclusively on the basis of qualifications, knowledge, skills, performance and taking into account the commitment demonstrated by the individual worker. With a view to enhancing human resources (prog . 5.2), **ARMETTA NICOLETTA SRL** deems it appropriate for all employees to be supported in the development of their abilities, skills and potential and considers the integration of all workers as an essential element. An employee who believes he or she has suffered any form of discrimination, direct or indirect, can report it to top management.

6.4. Child labor

ARMETTA NICOLETTA SRL disapproves of child labor and undertakes not to employ it, in particular it intends to only hire employees who are at least 18 years of age and have completed the compulsory course of study. In order to guarantee the practical application of this premise, during the selection phase, the personnel in charge of the interviews promptly request that they reach the age of majority as a necessary requirement for hiring. During the hiring phase, the correspondence of the personal data with what was declared is verified by requesting the relevant documents. If the selection procedure is assigned to third parties, they must be promptly informed in relation to the checks to be carried out .

ARMETTA NICOLETTA SRL encourages the development of a culture oriented towards the protection of minors, disseminating this principle in particular among its suppliers .

7. RELATIONSHIPS WITH CUSTOMERS, WITH SUPPLIERS, WITH THE PA

7.1. Relationships with customers


ARMETTA NICOLETTA SRL believes that the satisfaction of its customers is to be considered as a primary objective and considers transparency a fundamental element in the relationship with them, therefore it undertakes not to introduce products on the market that could damage the user's health. Furthermore, the employees of **ARMETTA NICOLETTA SRL** must inform customers clearly about the characteristics of the goods and services offered and, in commercial communications, relate to them in an equally clear and truthful manner.

7.2. Relationships with suppliers

To choose its suppliers, **ARMETTA NICOLETTA SRL** evaluates both the economic convenience, the competence, the reliability, the quality of the raw materials, and the ability to guarantee compliance with the legislation on health and safety at work and in general the compliance with the rules, in particular on illegal work. **ARMETTA NICOLETTA SRL** undertakes not to stipulate supply and/or service contracts with companies that do not respect the collective labor agreements in force towards their employees.

In relations with suppliers, it is forbidden to use one's position within **ARMETTA NICOLETTA SRL** to obtain any personal advantage or benefit.

7.3 Relations with the Public Administration

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ARMETTA NICOLETTA SRL has limited relations with the Publication Administration (hereinafter, PA) as it is not among its potential customers and contacts remain limited to the completion of bureaucratic procedures. In any case, since maintaining relationships with the PA can present critical profiles, these relationships must be managed with a particularly high level of attention.

Therefore, by way of example and not exhaustively, the behaviors that must not be implemented in relations with the PA, both by the staff of **ARMETTA NICOLETTA SRL**, **are reported**. (employees, collaborators, etc.) both by the top management bodies and by the consultants to whom the company assigns professional tasks:

- ✓ carry out actions that have the purpose of persuade employees, collaborators, consultants of the PA to do or not do anything, violating regulatory provisions;
- ✓ try to influence the subjects who make decisions on behalf of the PA (e.g. political representatives);
- ✓ hire employees, collaborators or consultants of the PA (or their relatives or in-laws) with whom **ARMETTA NICOLETTA SRL** has professional contacts;
- ✓ assign professional tasks to the above subjects.

In any case, it is forbidden to entrust professional tasks or hire employees or former employees of the PA, or their relatives and in-laws, who in the last three years have taken part in the issuing of an administrative provision for the benefit of Armetta Nicoletta srl .

Only those (employees/staff) expressly appointed by **ARMETTA NICOLETTA SRL** will be able to have contact with the PA (e.g. the administration manager). In any case, in contacts with the PA, **ARMETTA NICOLETTA SRL** cannot be represented by subjects who find themselves in conflict of interests, even potential, with the PA itself or by subjects who in the past have been convicted of crimes against the PA. Consequently, those who represent the company in relations with the PA must report any situations, including potential conflicts of interest, to top management.

Faced with ethically incorrect behavior on the part of representatives of the PA, the subjects representing **ARMETTA NICOLETTA SRL** must promptly report such behavior to the company management.


7.4. Gifts / corruption prevention

ARMETTA NICOLETTA SRL he intends to prevent the corruption towards both public and private entities, prohibiting the payment or promise of money or other benefits to obtain illegitimate advantages, as well as the acceptance of sums of money or gifts or other favors that go beyond the usual forms of courtesy .

All employees are therefore prohibited from accepting gifts or other forms of donations from anyone who wishes to start or maintain business relationships with the company. It is also prohibited to give or promise, even through a third party or indirectly, money, gifts or other forms of bonuses or opportunities, to customers or potential customers.

It is forbidden to receive, even through a third party or indirectly, money, gifts or other forms of gratuity from suppliers or possible suppliers of the Company.

The above does not apply to gifts of modest value (this means those with a value of less than 100 euros) such as, for example, Christmas gifts.

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It is forbidden to receive gifts or other donations to your private address. Should this happen, this fact must be promptly communicated to top management.

8. PROTECTION OF COMPANY ASSETS

Each worker undertakes to diligently use the company assets assigned to him, to look after them with care, in compliance with the regulations regarding the processing of personal data.

It is forbidden to use company assets inappropriately or for personal purposes.

The following are considered company assets, by way of example and not limited to:

- machinery, equipment, PPE, cars and IT devices (e.g. mobile phone, smartphone, desktop or laptop computer, etc.), email services and internet access.

Company equipment cannot be used for illegal purposes, in particular the IT devices made available to workers for carrying out their work cannot be used to encourage the circulation of illicit or pornographic material. Likewise, they must not be used to facilitate organized crime, including transnational ones.

Staff must promptly notify management of any loss, damage or theft of company assets.

9. COMPANY REPUTATION


During work, inappropriate attitudes that may cause damage to the image or reputation of **ARMETTA NICOLETTA SRL** are prohibited .

ARMETTA NICOLETTA SRL hopes that its workers can have equally dignified behavior even outside the workplace.

10. ACCOUNTING TRANSPARENCY

All accounting operations must be approved, recorded, documented, lawful, appropriate and complete. Records must be appropriate and must allow feedback on the decision, approval and implementation processes. Staff must contribute to ensuring that their work activity , which may affect accounting operations, is reported accurately and promptly in the accounting. For all accounting operations it is necessary to keep the documents that support them in order to guarantee the identification of the different levels of responsibility and the accurate reconstruction of the operation. Documentation must be archived promptly. The documents must be archived in the appropriate paper binders, and, where necessary, they must be recorded in IT media. Each employee must ensure that the documentation relating to their work is easily available. Company payments must correspond to the service and provided according to the methods indicated in the contract, furthermore they cannot be paid to a person other than the contractual counterparty. The use of company funds for illegal or improper purposes is prohibited. Payments that do not relate to properly authorized business transactions are not permitted.

11. EFFECTIVENESS OF THE CODE OF ETHICS, OBLIGATIONS, REPORTS, VIOLATIONS, SANCTIONS

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All subjects identified as recipients of this Code of Ethics must comply with its provisions. The behavior of all members of the company team and of third parties who, in various capacities, operate with **ARMETTA NICOLETTA SRL** must comply with the principles established in the company Code of Ethics.

As regards employees, the provisions of this company Code of Ethics are considered an integral part of the conditions that regulate employment relationships as an expression of the behavior that they are required to observe, by virtue of the civil and criminal laws in force and the obligations established by the collective bargaining.

For employees, the sanctions are aligned with those governed by the applicable National Collective Agreement (CCNL).

Even for administrators, consultants, collaborators and third parties in general, compliance with the contents of this code, with the company rules and procedures, constitutes an essential part of the contractual obligations assumed towards **ARMETTA NICOLETTA SRL** .

Third parties (for example: agents, representatives, suppliers, partners, etc.), adequately informed, must comply with the provisions contained in this Code of Ethics. Violations of the same may be considered as contractual breach, and as such, may justify the termination of existing contracts.

Violations can be reported to top management, via email, even personally, or verbally: the report will be managed while guaranteeing confidentiality. Company management will proceed to verify the validity and, in the latter case, employees and/or third parties who have professional relationships with the Company who are found to have violated this Code of Ethics may be subjected to appropriate corrective and/or disciplinary actions.