

Industrial Project doo
Dragonja 115
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Code of Ethics

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STATEMENT OF THE MANAGEMENT

Ponzano Veneto, 29.11.2021

To all employees of the I.P. doo

Our Company's Code of Ethics has recently been approved.

This document is aimed at spreading the set of internal and external principles and rules that govern the life and proper functioning of our Company.

Knowing the contents of the Code and, above all, accepting and respecting its guidelines, are decisive factors for the proper operation and success of our Company.

We are positive that each of us, in the sphere of our own actions, will adhere to the guidelines set forth in the Code with a sense of responsibility and thus contribute to the increase and development of the value and reliability of our services as well as the reputation by which our Company has always been identified.

[Administrator]



1 OBJECTIVES

With this Code of Ethics, I.P. doo aims to define and explain the values and principles of behaviour that shape its activity and relationships with all entities with which it cooperates to achieve the purpose of the Company itself, with a view to preventing irresponsible or illegal behaviour of all those who work in the name and on behalf of the Company.

The Company undertakes to guarantee to all who are related thereto, be it employees, clients, suppliers or interested parties in general, that the Company business shall be carried out in full compliance with the law, within the framework of fair market competition, with honesty, integrity, fairness and in good faith, respecting the legitimate interests of employees, partners, clients, commercial and financial partners.

2 WHOM IT IS INTENDED FOR AND GENERAL PROVISIONS

Administrators, employees and collaborators of I.P. doo are obliged to comply with this Code at the time of assuming their duty and act inspired by the principles of loyalty, impartiality, integrity and honesty.

In addition to those identified in the previous paragraph, all entities (natural or legal persons, public authorities, etc.), in working and business relationships that are generally established with the Company, are also obliged to adhere to the principles contained in the Code.

Persons whom this Code is intended for must avoid any act or conduct that contravenes or may lead to believe that the provisions of the law and of this Code have been infringed. Employees and co-workers strive to ensure harmonious relations with colleagues and avoid acts or behaviours that dirage the principle of mutual respect. Administrators, employees and collaborators coordinate their work and use of the Company assets with the criteria of correctness, cost-effectiveness, efficiency and effectiveness.

In external relations, administrators, employees and collaborators act in such a way as to establish a relation of trust and cooperation with the entities that come in contact with I.P. doo; they show courtesy and accessibility in communication and solve problems efficiently and swiftly.

3 PRINCIPLES OF BEHAVIOUR

3.1 Legality, correctness, honesty and integrity

I.P. doo acts in compliance with the applicable laws and professional ethics.

The Company interests can never justify any behaviour contrary to the principles of legality, correctness, honesty and professionalism.

Therefore, any form of favouritism, whether requested or offered, which could be perceived as a tool aimed at influencing the independence of decisions and behaviour of the parties, is rejected.

Corruption practices, illegitimate services, collusion, recruitment, direct or through third parties, personal benefits for oneself or others are prohibited.

Acts of commercial courtesy such as gifts or forms of hospitality, are permitted provided that their value is modest, and in any event, such that they do not jeopardise the integrity or reputation of one of the parties and cannot be interpreted by an impartial observer as acts aimed at obtaining undue advantage.

Administrators, employees and collaborators shall not be using an office or any of the company premises to obtain private or personal goals or benefits.

Administrators, employees and collaborators shall not use the position they hold to obtain benefits or advantages in internal or external relations, not even of private nature.

Administrators, employees and collaborators shall not be using the data which is not publicly available or has been made public, even that obtained in confidence during the performance of their duties for the acquisition of profits or private interests.

Administrators, employees and collaborators shall avoid receiving benefits of any kind, which could be or appear to be such as to affect their independence of judgement or impartiality; they shall also not accept any gifts or other benefits for themselves or others from external entities that intend to enter into relations with the company, with the exception of modest gifts.

Administrators, employees and collaborators shall act impartially, avoiding favourable or unequal treatment; they shall refrain from applying undue pressure and reject it, adopting initiatives and decisions with utmost transparency and avoiding the creation or use of preferential situations.

Administrators, employees and collaborators shall not undertake obligations or make personal promises that could affect the fulfilment of their personal duties.

3.2 Loyalty and good faith

In general, relations with third parties must be based on good faith and honesty, carried out with sound behaviour in terms of sustainability of the contract, fulfilment of the agreement, promises, valorisation of the Company assets and implementation of each decision in good faith.

3.3 Conflict of interest and impartiality

In performing each of their activity, administrators, employees and collaborators of I.P.

do act so as to avoid situations of conflict of interest, be it real or only potential, which could hinder the ability to make impartial decisions in the best interest of the Company and in full compliance with the provisions of the Code.

For instance, the following situations may lead to a conflict of interest:

- economic and financial interests of administrators, employees and/or their families in the roles of suppliers, buyers and bidders;
- using the position within the Company or information acquired at work so as to cause a conflict between personal interests and the Company interests;
- performing any type of business with customers, suppliers, bidders;
- accepting money, services or benefits from persons or companies that have or intend to enter into business relations with the Company;
- performing duties responsible for making decisions in the Company and in the non-profit organisations that receive grants or are financed by the Company itself.

Administrators, employees and collaborators immediately inform the Company about any interests, including those of an economic nature, which they, their spouse, first relatives or common-law partners have in affairs or decisions under their jurisdiction.

In any event, administrators, employees and collaborators shall refrain from participating in affairs or decisions that lead to such a conflict and provide the Company with any further information requested.

3.4 Free competition

I.P. doo accepts free competition, provided it is fair, as a determining factor for the growth and constant improvement of the Company. The Company refrains from conduct contrary to this principle, whether secret agreement, greed and/or abuse of position.

3.5 Fairness and equality

In relations with all contracting parties, I.P. doo avoids any discrimination based on age, gender and ethnic origin, nationality, political beliefs, religious beliefs, gender, sexuality or health status of its interlocutors.

3.6 Professionalism and valorisation of resources

I.P. doo guarantees an appropriate level of professionalism in performing the tasks entrusted to its employees and collaborators.

Improvement of human potential, respect of their autonomy, and encouragement based on their participation in business decisions are fundamental principles for the Company which will provide appropriate tools and programmes for professional improvement, development and training in order to improve specific professionalism

and maintain and improve the skills acquired during cooperation.

3.7 Protecting health and safety of employees

Regardless of the type of contractual relationship, employees and associates of I.P. doo are guaranteed decent working conditions, in a safe and healthy working environment.

Above all, the Company:

- considers respecting the safety and health of employees a priority;
- considers the management of employee health and safety an integral part of overall management of the organisation;
- promotes inclusion, participation and collaboration of all Company resources related to the aspects of employee health and safety;
- guarantees the necessary resources for proper management of health and safety matters at work.

3.8 Environmental protection

I.P. doo is committed to environmental protection. It directs its choices so as to secure compatibility between its economic initiative and ecological needs, in compliance with applicable laws.

Energy saving goals are observed, waste of energy and natural resources is avoided.

3.9 Protecting the Company image

Protecting the Company image and respecting the recognisable elements of the Company are important aspects in the competitive context in which I.P. doo operates. Administrators, employees and collaborators are obliged to protect the Company image adopting the behaviours that ensure maximum respect for the persons and the environment in which they work and live. The principles of order and cleanliness are implemented and must be respected. Workplace behaviour has to comply with these principles. Behaviours that may directly or indirectly interfere with those working on the Company premises must be avoided, particularly in the presence of guests. In addition to paying full respect to the common areas, it is prohibited to display posters or documents on the bulletin board or other places if they are not related to business operations and may offend others. It is a distinct duty of all administrators, employees and collaborators to avoid noise and loud tones and wear appropriate clothing.

3.10 Using intellectual and material Company property

Using intellectual and material Company property, including IT tools, must take place in compliance with general rules and their intended use and in a way to protect their preservation and functionality, avoiding their use contrary to any provision of laws and

internal regulations.

4 GUIDELINES FOR RELATIONS WITH INTERESTED PARTIES

4.1 Customer relations

I.P. doo believes in free and fair competition and bases its operations on achieving competitive results that reward ability, experience and efficiency.

Any action aimed at changing fair competition conditions is contrary to the policy of I.P. doo and shall be prohibited to any person acting on its behalf.

I.P. doo focuses its activity on satisfaction and protection of its clients, paying attention to the requirement that can improve the quality and safety of the products and services it offers.

The information and documentation provided to its customers, acquired or potential, related to the products and services offered or to the experiences and references held by I.P. doo, are true, accurate and exhaustive so that the customers can make informed decisions.

The arrangements led by the I.P. doo staff, contractual relations and the Company communication are inspired by the principles of ethics, honesty, professionalism, transparency and, in any event, based on maximum cooperation.

I.P. doo undertakes to respect the right of its clients not to use services and any products harmful to their health and physical integrity and to have complete information about the services offered.

Compliance with the said principles is required from all those who deliver and/or promote and/or sell merchandise and/or services on behalf of I.P. doo and, in general, anyone representing it.

Pursuing the Company interests can under no circumstances justify the behaviour of its management or associates that is not in accordance with the applicable laws and rules of this Code of Ethics.

4.2 Relations with partners and suppliers

With their collaboration, I.P. doo's partners and suppliers enable the specific realization of the Company business.

The Society undertakes to:

- develop relationships of correctness and collaboration with partners and suppliers based on communication that enables the mutual exchange of skills and information and favours the creation of shared value;

- to guarantee each company with the required props the possibility of competing for procurement, adopting objective evaluation criteria in the selection with declared and transparent methods;
- to comply with the agreed terms and conditions.

4.3 Relations with collaborators

I.P. doo recognises the importance of its employees and associates as one of the fundamental factors for achieving the Company objectives, and it adopts procedures and methods of selection, development, evaluation and training aimed at ensuring maximum fairness and equal possibilities without discrimination based on gender, race, age, sexual orientation, religious belief and any other factor. People are employed based on their experience, abilities and expertise. Employment is based solely on the matching of expected and required profiles.

The Company undertakes to offer to all of its employees the same opportunities, ensuring that they may all enjoy equal treatment based on strictly professional criteria for any decision related to professional life, without discrimination of any kind.

I.P. doo manages its business operations in accordance with the applicable laws related to working environment conditions, committing to build a dignified and decent environment for everyone.

The Company undertakes to spread and strengthen the culture of safety by developing the awareness of risks and knowledge and compliance with applicable laws on prevention and protection, promoting responsible behaviour of all employees.

I.P. doo expects all employees to cooperate in maintaining the Company climate based on respect of individual dignity, honour and reputation of each of them, and to intervene to protect any offensive or defamatory interpersonal behaviour.

4.4 Relations with public administration and other external entities

I.P. doo actively and completely collaborates with the authorities through its personnel and organisations.

All relations with the authorities are based on principles of fairness, transparency, collaboration and non-interference, in accordance with the mutual roles and procedures of the Company.

It is forbidden to give, encourage or favour false statements to the authorities.

I.P. doo does not support events or initiatives that have an exclusively or predominantly political purpose and refrains from any direct or indirect pressure on politically exposed persons.

4.5 Media relations

External information must be truthful and transparent.

In communication with the media, I.P. doo must present itself in a detailed and homogeneous manner. Media relations are reserved solely for the Company management.

Employees of I.P. doo cannot provide information to media representatives, nor can they undertake to provide it without authorisation of the Company management.

In no way or in any form may the managers and employees of I.P. doo offer payments, gifts or other advantages aimed at influencing the professional activity of the media or which could reasonably be interpreted as such.

5 PROTECTING INTANGIBLE COMPANY PROPERTY AND KNOW-HOW

All information concerning, in particular, but not only the design and the service provision system used in the Company, the products used, and the knowledge and experience of the Company constitute economic assets that should be protected.

I.P. doo therefore intends to carry on efficient protection of its knowledge and experiences by using all protection tools provided for by law, as well as by adopting adequate measures and procedures aimed at guaranteeing the confidentiality of the Company data with the aim of:

- limiting dissemination of confidential information to those who need it due to the duties they perform;
- minimising the risk that the said data is used incorrectly or disclosed outside the Company without special authorisation.

The Company undertakes to expand and consolidate the culture of data and information protection by developing risk awareness and familiarity with and compliance with current laws on the processing and protection of personal data by promoting responsible behaviour of all employees.

5.1 Confidential information

The set of technical and/or commercial and/financial information, even if they are not explicitly labelled with words like “confidential” or “secret” and similar, which the employees and collaborators may find out owing to their position and in compliance with their workplace or collaboration, have financial significance for the Company.

The term Confidential Information shall mean all information, data, results, processes, procedures and everything else related to the following, noting that these are only some of the examples:

- commercial information and policies;

- management and economic and financial operations of the Company;
- Company relations with third parties.

The above information may be obtained by the personnel in any form (written, oral, electronic, direct insight or any other comprehensible form) as a consequence and as a result of employment or cooperation.

5.2 Using confidential information

Administrators, employees and associates of the Company shall ensure the confidentiality of confidential information and use it exclusively for the performance of their duties and may in no case use it otherwise.

Employees and collaborators of the Company are obliged not to disclose, transmit and/or communicate the said information, not even partial, to third parties (companies, entities or natural persons) nor to in any way reproduce, copy and/or duplicate documents (including those electronic) containing confidential information or part thereof, except with the prior written consent of the responsible persons concerned.

Unless previously approved, personnel are not authorised to carry documents, projects, drawings or anything else containing confidential information outside the company premises. An exception to this prohibition is allowed in the case of a business trip. Employees who have to work from home can take the necessary materials with them with the prior approval of their immediate superior.

Employees and collaborators undertake to handle portable magnetic media (floppy disks, CDs and DVDs, USB media, external memories etc.) with special care which may contain the information representing the Company know-how, to prevent the theft and/or change and/or destruction and, after the deletion, retrieving of contents.

The obligation of secrecy laid down above, as well as the resulting prohibitions referred to in the preceding paragraphs, bind the staff for the duration of the employment relationship and after its termination.

5.3 Managing third-party information

All technical and/or commercial and/or financial information obtained from third parties that the Company used in the context of established contractual relations, even if it is not especially marked with words like “confidential” or “secret” and similar shall remain the exclusive ownership of third parties. Also, full confidentiality must be guaranteed for the said information as well seeing that it represents the Company know-how owned by others and protected by law. Therefore, the same rules apply to the said information as for the Company know-how and the prohibition of unauthorised, direct or indirect, dissemination or use.

6 CORPORATE COMMUNICATION AND PROTECTING

COMPANY INTERESTS

I.P. doo ensures the keeping of accounting records, the formation and creation of financial statements, documentation, corporate communication in general and everything else that is necessary, in compliance with legal provisions, international standards, and technical norms in force.

I.P. doo promotes sound and timely information to all interested authorities and functions in relation to the preparation of financial statements, semi-annual financial statements, documentation, corporate communication in general and everything else necessary for its functioning. It shall also determine accurate collaboration between the competent authorities and functions of the Company and favour controls by the competent authorities.

Everyone shall abide by the rules aimed at safeguarding the integrity and efficiency of the share capital, in order not to jeopardise the securities of creditors and third parties in general.

7 TAXES

The Company undertakes to fully and transparently fulfil all tax obligations provided for by applicable laws and to cooperate with the Tax Administration where necessary. Tax returns and tax payments are not only legally binding but also unavoidable in the context of corporate social responsibility.

8 IMPLEMENTATION

Compliance with the provisions of this Code must be considered an essential part of the contractual obligations of all persons for whom it is intended.

In compliance with applicable laws and with the aim of planning and conducting the Company operations focused on efficiency, correctness, transparency and quality, I.P. doo adopts organisational and management measures suitable for preventing illegal behaviour or, in any case, behaviour contrary to the provisions of this Code of Ethics by any person who acts on behalf of the Company.

Procedures for reporting and verifying violations are based on the criteria of discretion and protection of confidentiality in order to prevent retaliation of any kind against the reporting party, as well as to guarantee the verification of truth of the facts.

9 SANCTIONING

In order to ensure the proper and effective implementation of this Code of Ethics, cooperation of all interested parties is required.

Violation of its provisions shall constitute a disciplinary offence and failure to fulfil the contractual obligations of employees or professional associates with all resulting legal and contractual effects.