



CODE OF  
CONDUCT  
GAMMASTAMP  
GROUP

# Code of Conduct

## Gammastamp Group

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## 1 Preamble

Gammastamp S.p.A. Group (hereinafter also the Group or simply Gammastamp) has as its corporate purpose the production, assembly and stamping on its own behalf and on behalf of third parties of sheet metal products, small metal parts and mechanical products in general, construction and processing of moulds, equipment and machinery.

With this Code of Conduct (hereinafter also the Code), Gammastamp establishes the rules of conduct that it intends to follow in the exercise of its business activities aimed at preventing unlawful or unethical conduct, or in any case unethical, by those who operate in the name and on behalf of the Company, outlining clearly and explicitly the criteria of conduct and ethical responsibilities of its directors, employees and collaborators, both in internal and external relations.

## 2 Recipients

The principles and contents of this Code of Conduct are illustrative specifications of the obligations of diligence, loyalty, impartiality and good conduct that qualify the proper performance of work performance and behavior in the work environment.

The Code is intended for all those, employees and others, who, for whatever reason, have commercial and/or legal relations with the Group. All recipients are required to know it and to comply with its provisions, contributing to its dissemination and observance.

The Code integrates the rules of conduct that the addressees are required to observe by virtue of the regulations in force, employment contracts and internal procedures; its violation may be a source of liability - for whatever reason - disciplinary and/or compensation.

## 3 Principles and values

### 3.1 Compliance with applicable laws and regulations

Legality is considered an essential value in the conduct of the Group's own activities. The Group operates in full compliance with the laws and regulations in force in the countries where it is present and intends to behave in a manner that does not compromise professional and moral reliability. Illegal conduct and, in particular, any conduct that may constitute one of the types of offences referred to in Legislative Decree no. 231 of 8 June 2001 and subsequent amendments and additions, cannot be tolerated in any way.

Each Recipient undertakes to diligently acquire the necessary knowledge of the laws and regulations applicable to the performance of their duties, as from time to time in force.

The adoption of all organizational instruments aimed at preventing the violation of legal provisions and the principles of transparency, correctness and loyalty by employees is promoted.

### 3.2 Social equity and personal value

In carrying out their professional activities, each employee, and in general each Recipient, is required to behave in line with the principles of fairness, honesty and moral integrity.

The Group respects the fundamental rights of the people with whom it interacts, for whatever reason, protecting their physical and moral integrity and guaranteeing equal opportunities.

The Group rejects all forms of discrimination based on age, sex, sexual orientation, health status, race, nationality, cultural extraction, political opinions and religious beliefs and prohibits all the Companies belonging to the Group, both in Italy and abroad, from any form of exploitation of labour and, in particular, child labour; it guarantees safe and healthy working environments and working conditions that respect individual dignity.

Gammastamp favours a working environment that, inspired by respect, fairness and collaboration and based on the experience gained in the areas of expertise, allows the involvement and responsibility of

employees and collaborators, with regard to the specific objectives to be achieved and how to pursue them.

Gammastamp encourages the continuous growth of the technical and professional skills of human resources with the aim of protecting and increasing their value

### **3.3 Reliability and innovation**

All processes, products and solutions provided by the Group are based on the principles of reliability and innovation. The Group is based on an industrial structure capable of creating reliable products, also in terms of quality and safety, and processes characterized by a constant drive for innovation, technological evolution and the search for continuous improvement, combining tradition, industry, technology and the ability to interpret customer needs, with a strong propensity for long-term collaboration..

### **3.4 Balance**

The Group pursues the constant search for balance in a continuous attempt to reconcile productive, economic, environmental and social interests, with a view to sustainable development and growth.

### **3.5 Commitment and diligence**

The Recipients undertake with the utmost seriousness to perform with diligence and accuracy the tasks and duties incumbent on them and to honor the commitments arising from contracts and obligations.

### **3.6 Transparency and completeness of communications and information.**

Recipients are required to provide complete, transparent, understandable and accurate information. Gammastamp is committed to ensuring that stakeholders are always in a position, on the basis of the information provided to them, to make conscious decisions.

## **4 Criteria for business conduct and rules of conduct**

All the activities of the Gammastamp Group must be carried out, in compliance with the law, with honesty, integrity, fairness and good faith, respecting the legitimate interests of customers, employees, shareholders, business and financial partners and the communities in which the Group is present with its activities.

These objectives are pursued by developing its activities according to the highest quality standards, following the logic of efficiency and openness to the market, preserving the value of fair competition with other operators and refraining from any collusive and abusive behaviour to the detriment of customers or third parties.

### **4.1 Compliance with applicable laws**

In carrying out its activities, the Gammastamp Group acts in compliance with the laws and regulations in force in all the countries in which it operates, including, for example, tax and fiscal regulations, anti-money laundering, health and safety of workers, environmental regulations, industrial and intellectual property protection, competition and antitrust regulations and requires the Recipients of this Code to comply with this requirement, and to behave in a manner that does not compromise the moral and professional reliability of the same.

### **4.2 Conflict of interest**

Corporate Bodies, Employees and Collaborators must ensure that every business decision is taken in the interest of the Company, in line with the principles of correct corporate and entrepreneurial management

of the Company. They must therefore avoid all situations and activities in which there may be a conflict of interest between personal or family economic activities and the tasks covered, such as to interfere or affect the ability to make decisions in an impartial and objective manner. Recipients therefore avoid any abuse of their position with the aim of achieving undue advantages for themselves or others. Any situations of conflict of the employee or collaborator, even if potential, must be promptly and in detail communicated to the functions/structures in charge of the Company and the person in conflict must refrain from carrying out or participating in acts that may harm the Company or compromise its image.

### **4.3 Accounting and internal control**

The Gammastamp Group complies with the laws and, in particular, with the applicable regulations relating to the preparation of financial statements and any type of compulsory administrative-accounting documentation.

The accounting records must be kept in an accurate, complete and timely manner, in compliance with the company's accounting procedures, in order to achieve a true representation of the balance sheet/financial situation and management activity.

All actions and operations must therefore be correctly recorded, authorised, verifiable, legitimate, consistent and appropriate. The accounts are based on generally accepted accounting principles and systematically record the events arising from the management of the individual Company. To this end, all company functions are required to ensure maximum collaboration so that management facts are correctly and promptly represented in the company accounts, guaranteeing completeness and clarity of the information provided, as well as correctness and accuracy in data processing.

### **4.4 Correctness of financial flows**

Any operation that may involve the slightest possibility of the Group's involvement, even in the form of an association, in matters of receiving stolen goods, money laundering, use of goods or money of illicit origin is prohibited.

The Group manages the financial flows guaranteeing the complete traceability of the operations, keeping adequate documentation and always within the limits of the delegations and powers assigned to each person in possession of adequate powers. This documentation must make it possible to identify the reason for the transaction that generated the detection and the related authorization. The supporting documentation must be easily retrievable and filed according to appropriate criteria that allow easy consultation by both internal and external bodies authorized to control.

In particular, both internal and external auditors must have free access to the data, documents and information necessary to carry out their activities. It is expressly prohibited to prevent or hinder the performance of the control or audit activities legally assigned to shareholders, other corporate bodies or the appointed audit firm.

Available information (including financial information), on commercial counterparties, consultants, suppliers and third parties with whom the Group has dealings, are always verified in advance in order to ascertain the moral integrity, respectability and legality of third parties.

### **4.5 Corruption and recycling**

Recipients must never carry out or be involved in activities that involve laundering (i.e. accepting or processing) of income from criminal activities in any form or way, strictly observing anti-money laundering laws.

Employees and collaborators must verify in advance available information (including financial information) on business partners, consultants and suppliers in order to ascertain their moral integrity, respectability and the legitimacy of their activity before establishing business relationships with them.

Corporate bodies, employees and collaborators are required to strictly observe the laws, policies and company procedures in any economic transaction, including intra-group transactions involving them, ensuring full traceability of incoming and outgoing financial flows and full compliance with anti-money laundering laws.

## **4.6 Confidentiality and external communication**

The Company ensures the confidentiality of the information in its possession and refrains from searching for confidential data, except in the case of express and informed authorization and compliance with current legal regulations. It also undertakes to protect the data acquired, stored and processed as part of management activities, in full compliance with the provisions of the law on Privacy. Any investigation into the ideas, preferences, personal tastes and, in general, the private life of employees and collaborators is prohibited. The processing of personal data must in any case be preceded by the express consent of the interested party, issued following specific information and in application of current legislation on the subject.

All information that is not in the public domain relating to the Group, or to other subjects, is to be considered confidential and may only be used for the performance of one's work activity.

Recipients are also required, as regulated by specific internal regulations, not to disclose to third parties, except when disclosure is authorised by the Group or provided for by law or regulations, information acquired or of which they have become aware in the course of their work.

In addition to the provisions on confidentiality, the communication and disclosure to the outside world (including through the mass media) of news, information and data relating to the Company is based on respect for the right to information and is reserved exclusively to the corporate functions responsible for this; under no circumstances is it permitted to disclose false or biased news or comments.

## **4.7 Industrial and intellectual property protection**

The Group requires all Recipients to act in respect of industrial and intellectual property rights legitimately held by third parties in compliance with laws, regulations and conventions, whether in the EU and/or international context to protect such rights. All Recipients of this Code of Conduct must refrain from illegally and/or improperly using, in their own interest, company or third parties' interests, intellectual property (or parts thereof) protected under copyright infringement legislation. All Recipients are required to protect, as a fundamental part of the assets and primary factor of value creation, confidential information in their possession and industrial property rights relating to ideas developed within the organization

## **4.8 Use of information and communication tools**

The addressees of the Code shall strictly comply with the Company's procedures and policies on IT security and shall use Company resources - such as personal computers, telephone equipment and other communication tools - in compliance with the above mentioned procedures and policies, avoiding any behaviour that may compromise the functionality, processing capacity, data integrity or protection of the Company's IT system.

## **4.9 Use of company resources and assets**

Each recipient is required to use the company's resources and assets (instruments and consumer goods, third party assets under concession, loaned, rented or used) entrusted to him/her, working diligently and behaving responsibly to protect the assets themselves, avoiding improper use that may cause damage, reduction of efficiency, improper use by third parties or in any case be contrary to the interests of the Gammastamp Group.

Any use of company resources for personal use and interest of any kind is prohibited; their use that is in contrast with the laws in force, although such use may in the abstract derive an interest or advantage in favour of the Company.

## **4.10 Constructive competition**

The Gammastamp Group considers the presence of free competition on all markets in which it is present to be indispensable, since this is the incentive for the Group itself to go even further towards more and more

qualified production; it is therefore committed to ensuring compliance without any distortion. It also undertakes to be competitive in a fair and honest manner and not to seek, accept or publish trade secrets or confidential information of competitors.

#### **4.11 Gifts and other forms of benefits**

The Group condemns any behaviour by Recipients, including those who carry out activities in favour of or on behalf of the Group, aimed at promising, offering, paying or accepting, directly or indirectly, money or other benefits in order to obtain or maintain a business or secure an unfair advantage in relation to business activities. Acts of commercial courtesy are permitted as long as they are of modest value or in any case such as not to compromise the integrity or reputation of one of the parties, or such as to be interpreted, by an impartial observer, as aimed at acquiring undue and/or improper advantages.

The donation of assets is permitted on anniversaries, anniversaries and/or holidays, provided they are of modest value and in any case within the limits decided by the General Management.

If, on the other hand, a person in the company receives explicit or implicit requests for benefits from a member of the Public Administration, or from public or private bodies, he or she immediately informs the Management or the person to whom he or she is required to report for the adoption of appropriate checks and initiatives.

## **5 Personnel policies**

### **5.1 Human Resources Management**

The Gammastamp Group recognizes the importance of its employees and collaborators as one of the fundamental factors for the achievement of the company's objectives and adopts procedures and methods of selection, development, evaluation, professional growth and training aimed at ensuring maximum fairness and equal opportunities; more generally, it is committed to maintaining and encouraging a positive, tolerant and respectful of human dignity working environment that allows all collaborators to carry out their work in the best possible way.

In the context of personnel management and development processes, decisions taken are based on the correspondence between expected profiles and profiles possessed by employees and collaborators and/or on considerations of merit. Access to roles and assignments is also established in consideration of skills and abilities; moreover, compatibly with the general efficiency of the work, flexibility in the organization of work that facilitates the management of maternity, paternity and childcare in general is favoured.

Personnel assessment is carried out in a broad and documented manner involving the managers, the people who enter into daily relations with the assessor and the human resources function; the aim is to enhance the skills and abilities of each individual, encouraging positive and proactive behaviour.

In the case of work reorganization, the value of human resources is safeguarded by providing, where necessary, training and/or professional requalification actions.

The Group considers unacceptable any type of discrimination, violence, harassment, exploitation or unwanted, aggressive, hostile or disparaging behaviour that violates the dignity of the person or his/her professionalism.

### **5.2 Relations with political organisations, trade unions and associations**

The Group bases its decisions and behaviour in compliance with regulations and collective agreements, in collaboration with the freely elected trade union representatives of workers in accordance with the regulations in force and in a constructive spirit of industrial relations.

The Gammastamp Group does not contribute in any way to the financing of political and trade union parties, movements, committees and organisations or their representatives or candidates. It refrains from behaving in such a way as to exert direct or indirect pressure on political representatives or organisations.

The Group may also cooperate financially with non-political associations for specific projects, for purposes related to the activity of the Company or social purposes, ensuring, subject to proper authorization of the internal functions responsible, a clear and documentable allocation of resources

## **6 Ethical rules towards third parties**

### **6.1 Relations with customers**

The satisfaction of customers' requests and the establishment of constructive relationships are fundamental objectives and these relationships must be managed with impartiality, in compliance with contracts and set quality standards, with high professionalism, availability, courtesy and collaboration, in order to provide them with the highest level of products and services. The addressees of the Code are required to respect the commitments and obligations they have undertaken towards their customers and to provide accurate, complete, truthful and timely information so as to enable them to make an informed decision.

With particular reference to the contractual relationship with customers, contracts and communications must be prepared in clear terms, formulated in technical language appropriate to the interlocutor, in compliance with current regulations, and complete, so as not to overlook any element relevant to the customer's decision.

It is the Company's responsibility to communicate in a timely manner any information regarding any changes to the general conditions, any changes in the economic and technical conditions of the products.

### **6.2 Relations with suppliers and external consultants**

The choice of suppliers and the purchase of goods and services are made on the basis of objective and documentable evaluations and criteria, regarding technical and professional skills, competitiveness, quality, fairness, respectability, reputation and economic value and must be aligned with company policies and procedures.

Purchasing processes and the stipulation of contracts must be based on the search for maximum value and the granting of equal opportunities for each supplier; negotiations with potential suppliers must be based on good faith, loyalty, transparency and collaboration, taking care to avoid unjustifiably partial negotiations.

The Recipients of this Code are required to establish efficient, transparent and collaborative relations, maintaining an open and frank dialogue in line with the best business practices; to obtain the cooperation of external consultants and collaborators in constantly ensuring the most convenient relationship between quality of service and cost and to demand the application of the contractual conditions.

Suppliers shall be required to comply with the principles of this Code of Conduct and to include specific provisions to this effect in contracts; suppliers are also required to transmit this Code of Conduct to their subcontractors.

In any case, in the event that the supplier, in carrying out its activity, adopts behaviours that are not in line with the general principles of this Code, the Gammastamp group is entitled to take appropriate measures to the point of precluding any other opportunities for collaboration.

### **6.3 Relations with public and private institutions**

The assumption of commitments and the management of relations, of whatever nature, with the Public Administration, with the guarantor and supervisory authorities, as well as with all institutional subjects, whether Italian or foreign, are reserved exclusively to the corporate functions in charge of this and to authorised personnel, in strict compliance with the provisions of current legislation and applicable regulations.

The subjects involved are bound to the maximum transparency, clarity and correctness in order to establish a relationship of maximum professionalism and collaboration.



No corrupt practices, collusive behaviour or offers of money or benefits or commercial courtesy with the aim of directly or indirectly conditioning their activity are permitted in relations with the representatives of such persons.

It is strictly forbidden to unjustly obtain, to the detriment of the Public Administration or other national and international public bodies, contributions, financing, or other disbursements of the same type in any way called, granted and disbursed through the use or presentation of false or mendacious documents, or the omission of due information.

## **6.4 Media and media relations**

Information and communications relating to Group companies must be disclosed to the mass media only by the competent company functions or by persons specifically authorised for that purpose by those functions. Information must be truthful, transparent, homogeneous and consistent with company policies and programs.

## **7 Protection of health and safety**

The Companies of the Group guarantee, in compliance with the legislation in force to protect working conditions, an adequate working environment from the point of view of the safety and health of employees and Collaborators, taking all necessary measures.

The Company is committed to spreading and consolidating a culture of safety by developing risk awareness and promoting responsible behaviour on the part of all collaborators, also promoting compulsory training in First Aid, Fire-fighting and any other specialist training, in order to comply with legal obligations.

The employee who should detect the existence of activities considered unsafe or conditions that do not comply with safety standards will immediately report it to the hierarchical manager or to the Safety Prevention and Prevention Manager (R.S.P.) or to the Workers' Safety Representatives (R.L.S.).

## **8 Environmental protection**

The Gammastamp Group considers the environment and the workplace to be equal to productivity and profitability and works to ensure that plants, production and other processes and services do not cause significant environmental impacts in terms of preservation and protection.

The environmental policy, which is constantly evolving, is based on an awareness raising activity that involves all employees, starting from simple but very useful behaviours, such as separate waste collection and attention to energy saving.

## **9 Implementation of the Code of Conduct**

### **9.1 Supervisory Committee**

The Group identifies the Management and the Supervisory Committee (hereinafter also referred to as the SB or simply the Committee) as the body institutionally responsible for supervising the interpretation of the fundamental principles expressed in this Code, as well as their correct application and observance.

## 9.2 Communication and dissemination

The Gammastamp Group undertakes to promote and guarantee adequate knowledge of the Code of Conduct and its updates by disclosing it to the Recipients through specific information activities.

In order to ensure the correct understanding of this Code to all employees and collaborators, the human resources department will endeavour to promote the dissemination of its contents and the knowledge and full understanding of the principles and ethical rules. New recruits will receive training on the contents of the Code of Conduct as part of the company's induction courses.

The Group also undertakes to update the contents if necessary and appropriate due to changes in the context, the reference regulations, the environment or the company organisation.

Il Codice Etico viene pubblicato sul sito internet [www.gammastamp.com](http://www.gammastamp.com).

## 9.3 Monitoring and reporting

Recipients are obliged to report any violations of this Code of Conduct to the Committee or to the Head of Function who, in turn, will inform the SB directly.

Failure to comply with the reporting obligation is expressly sanctioned; no recipient will be sanctioned in the event of incorrect reporting if made in good faith.

The Group will not tolerate any kind of retaliation, discrimination and penalisation for reports made in good faith, without prejudice to legal obligations and the protection of the rights of those accused wrongly and/or in bad faith.

Except in cases of liability for slander or defamation, Group employees who report acts/acts of colleagues or other Recipients in violation of the contents of the Code may not be subject to disciplinary proceedings or any discriminatory measure with detrimental effects on their employment relationship.

Within the framework of a disciplinary procedure opened against those who are deemed to be the authors of acts/behaviour in violation of the Code, the identity of the whistleblower may never be disclosed, without his or her consent, if the allegation of the disciplinary charge can be adequately based on separate and additional investigations with respect to the report. On the other hand, if the disciplinary complaint can only be adequately founded, in whole or in part, on the report by others, the identity of the whistleblower may be revealed if his or her knowledge is absolutely indispensable for the defence of the accused.

The Committee assesses the existence and risk of the violations highlighted in relation to the company's values and regulations in force; it also assesses violations of the Code and the existence of hypotheses of criminal conduct, always within the scope of its powers and functions pursuant to Legislative Decree 231/01.

Contact with the Committee may be made by sending a letter by post to the attention of the "Supervisory Committee" or by e-mail addressed to the mailbox "[cds@gammastamp.com](mailto:cds@gammastamp.com)" provided for this purpose.

## 9.4 Sanctions

The rules of conduct set out in the Code constitute a basic reference with which the addressees must comply in their relations with their interlocutors.

Compliance with the rules of the Code of Conduct must be considered an essential part of the contractual obligations of employees pursuant to and for the purposes of applicable law. Violations of the rules of the Code of Conduct may constitute a breach of the primary obligations of the employment relationship or a disciplinary offence, with all legal consequences, also with regard to the preservation of the employment relationship, and may entail compensation for damages resulting from the same.

The Group undertakes to provide for and impose, with consistency, impartiality and uniformity, sanctions proportionate to the respective violations of the Code of Conduct and in compliance with the current provisions on the regulation of employment relations.

In any case of violation of the principles contained in this Code of Conduct, where necessary for the protection of the company's interests and compatible with the regulatory framework in force, also in terms of the provisions deriving from collective bargaining, the bodies in charge of the Company will evaluate any initiatives to be taken and the measures, including those of a disciplinary and sanctioning nature, to be taken against persons who have engaged in conduct that does not comply with this Code of Conduct.

In the latter case, any sanctions, to which the Company may add further claims for damages, may be applied:

- a) against employees of the Company (workers, clerical staff), within the limits of the regulatory framework on labour law and also in relation to the duties of diligence of the worker in the context of the services owed by the same;
- b) with regard to managers, on the basis of what is expressly provided for in this regard in labour law;
- c) with regard to directors, by way of suspension or revocation of office;
- d) with regard to external collaborators and third parties, also in terms of termination of the related contractual relations

All the above procedures shall in any case guarantee the confidentiality of the relevant information and indications, unless otherwise provided for by law and/or specific measures to the contrary made in accordance with the law in force.