

# CODE OF ETHICS

[28 March 2022]



**CONCETTI S.p.A.**

S.S. 75 Centrale Umbra Km 4,190 / Fraz. Ospedalichio / 06083 Bastia Umbra / PG / Italy  
T. +39 075 801561 / F. +39 075 8000894 / sales@concetti.com

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## **1. INTRODUCTION**

### **1.1 MISSION**

Concetti S.p.A. (hereinafter also “**CONCETTI**”, the “**Company**”) is a company specialised in the production of machines for weighing, bagging, closing and palletising bulk products. The Company carries out and follows all the phases of design, development and manufacture of the machines; these activities take place in a single factory in Umbria. Each packaging solution is unique and personalised, and is born from the close collaboration between the Company and the individual customer.

CONCETTI operates in about 60 countries worldwide: in addition to the registered office located in Bastia Umbra (Italy), the Company operates through subsidiaries in the USA and Brazil, and through local agency relationships in more than 50 countries around the world with service centres and highly skilled technicians.

### **1.2 THE COMPANY’S CODE OF ETHICS**

In carrying out its business activities, CONCETTI intends to ensure all the conditions aimed at complying with the law, as well as with the principles of correctness and honesty, transparency and impartiality, trust and confidentiality of the information that it will become aware of during the performance of its business. These principles are contained in this code of ethics which, together with the Organisation, Management and Control Model (for brevity the “**OMCM**” or the “**Model**”) represents the official documentation of the entity containing all the rights, duties and responsibilities with respect to all the various stakeholders and constitutes an essential element of the control system for the prevention of the crimes referred to in Legislative Decree 8 June 2001, no. 231 (hereinafter the “**Code of Ethics**”).

The Code of Ethics is inspired by an ideal of cooperation between people, respecting each one’s role, and constitutes a guide in making decisions and carrying out actions consistent with the culture of responsibility, legality, transparency and the creation of long-term value for all our interlocutors, contributing to sustainable development.

### **1.3 REFERENCES AND APPROVAL**

In drafting this Code of Ethics, CONCETTI complied with the Guidelines for the construction of organisation, management and control models pursuant to the aforementioned legislative decree dated 8 June 2001 no. 231 approved on 7 March 2002 and updated in March 2014.

This Code of Ethics was approved by the Board of Directors in the meeting of 28 March 2022.



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#### 1.4 SCOPE OF APPLICATION AND RECIPIENTS

This Code of Ethics constitutes an official document of CONCETTI and is intended as a binding document for all those who work with this subject, whether they are internal to the organisation or external to it.

The principles and provisions of this Code of Ethics are binding for all the following recipients (hereinafter the “**Recipients**”):

- the members of the Board of Directors, in pursuit of corporate action in all the resolutions implemented;
- the members of the Board of Statutory Auditors, in the control activity and in the verification of the formal correctness and substantial legitimacy of the Company’s activity and the functioning of the internal control and risk management system;
- all employees and collaborators with whom contractual relationships are entered into, for any reason, including occasional and/or only temporary;
- all those who have money or even free of charge relationships of any kind with the Company.

#### 1.5 GENERAL PRINCIPLES

This document is not intended to address every case in which one is called upon to operate, but wants to remind everyone of the need to comply with basic ethical principles in the daily conduct of their work.

This Code of Ethics is based on the following general principles:

I. Compliance with laws and regulations

CONCETTI operates in full compliance with the laws of the countries in which it operates, in compliance with the principles envisaged in the Code of Ethics

Recipients are therefore required, within their respective competences, to know and comply with the laws and regulations in force. The relations of the recipients with the authorities and public institutions must be based on the utmost fairness, transparency and collaboration, in full compliance with the laws and regulations and their institutional functions.

II. Impartiality and non-discrimination

In decisions that affect relations with its stakeholders (relations with customers, relations with shareholders, personnel management or work organisation, management of suppliers and partners, relations with the surrounding community and Institutions that represent it), CONCETTI avoids any discrimination based on gender, age, disability, nationality, sexual orientation, ethnicity, religion, opinions, policies and any other form of diversity.

III. Value and integrity of the person

CONCEPTS focuses on its people as an enabling factor to thrive in the current economic and social context. For this reason, CONCETTI protects and increases the value of the people who work in the company by promoting continuous learning and professional development.

In particular, CONCETTI ensures that its activities are not harmful to the dignity and autonomy of people, and that work organisation choices safeguard the value of individuals. CONCETTI guarantees the physical and moral integrity of its people, working conditions that respect personal dignity and individual specificities, and safe and healthy work environments. In addition, it ensures that no episodes of harassment, intimidation, mobbing or stalking occur in the workplace.

IV. Absence of conflicts of interest

In the conduct of any activity, situations must be avoided where the subjects involved in the transactions are, or may even appear, in conflict of interest.

By this we mean both the real or apparent situation in which the secondary interest (economic, financial, family or other nature) of the CONCETTI person interferes or tends to interfere with the ability to impartially make decisions in the best interest of the company and to fulfil the functions and responsibilities covered both in the case in which the representatives of customers, suppliers or public institutions, behave in their relations with CONCETTI in contrast with the fiduciary duties linked to their position.

V. Dissemination and compliance with the Code of Ethics

CONCETTI promotes knowledge and compliance with the Code of Ethics among all Recipients, requiring compliance and providing, in case of non-compliance, appropriate disciplinary or contractual sanctions. Recipients are therefore required to know the content of the Code of Ethics, comply with it and contribute to its implementation, reporting any shortcomings and violations (or even just attempts to breach it) of which they have become aware.

For this purpose, CONCETTI provides specific training/information programmes for employees, developed according to the different needs and responsibilities of the various users.

CONCETTI reiterates that any action by the Recipients, even if carried out for the benefit of the company, does not justify any behaviour in contrast with the aforementioned principles.

All Recipients, without distinction and exception, are therefore committed to complying with and enforcing these principles within the scope of their functions and responsibilities. This commitment requires that the subjects with whom the Company has relations in any capacity whatsoever, also act towards it with rules and methods inspired by the same values.

## **2. HUMAN RESOURCES, ETHICS IN EMPLOYMENT RELATIONS and PRIVACY**

### **2.1 COMPLIANCE WITH THE LAWS AND REGULATIONS IN FORCE**

CONCETTI operates in full compliance with the laws and regulations in force, in compliance with the principles envisaged in the present Code of Ethics.

Moral integrity and compliance with the aforementioned principles are a constant duty of all those who get in contact with CONCETTI and characterise the behaviour of the entire organisation.

The directors and employees of CONCETTI as well as those who in various capacities work with the Company, are required, within their respective competences, to know and comply with the laws and regulations in force.

CONCETTI applies rigorous accounting principles and criteria aimed at providing accurate and complete financial information and maintaining internal controls and processes suitable for ensuring that accounting and financial communications comply with the provisions of the laws in force.

### **2.2 RELATIONS WITH CUSTOMERS**

CONCETTI's activities are aimed at the satisfaction and protection of its customers by listening to requests that can favour an improvement in the quality of the products and services offered to them.

Relations with the latter must be based on the utmost fairness, transparency and collaboration, in full compliance with the laws and applicable regulations.

No employee, manager and/or collaborator of CONCETTI may take or give illegal sums of money or bribes to or from contractors, subcontractors, consultants, vendors, suppliers, correspondents, competitors or users. Likewise, no employee, manager and/or collaborator may take or grant goods, services or utilities of any kind.

CONCETTI is constantly committed to the continuous improvement of its organisation in order to improve the quality of the products and services offered.

### **2.3 RELATIONS WITH SUPPLIERS**

CONCETTI makes use of suppliers able to cooperate in a relationship of mutual loyalty, transparency and collaboration.

CONCETTI is entitled to take appropriate measures up to the termination of the contract in the event that the supplier, in carrying out its business in favour of the Company itself, behaves in a way that is not in line with the general principles of this Code of Ethics.

CONCETTI suppliers are also selected on the basis of the principles contained in the present Code of Ethics.



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## 2.4 RELATIONS WITH EMPLOYEES AND COLLABORATORS

The evaluation of the candidate for the establishment of an employment relationship is carried out on the basis of the correspondence of the profiles with respect to those necessary for the organisational needs of CONCETTI, in compliance with equal opportunities for all stakeholders and according to transparent methods for hiring new personnel.

The information is strictly connected to the verification of the aspects foreseen by the professional and psychometric profile, respecting the private sphere and the opinions of the candidate. Our personnel is hired with a regular employment contract; no form of irregular work is tolerated.

Upon establishing the employment relationship, each employee receives accurate information relating to:

- characteristics of the function and duties to be performed;
- regulatory and remuneration elements, as regulated by the national collective bargaining agreement;
- rules and procedures to be implemented for one's own work.

This information is shared with the candidate so that they fully understand before accepting.

CONCETTI is against any form of discrimination against its employees and/or collaborators. All employees must be treated with dignity and respect.

All types of discrimination based on bias or prejudice are prohibited, such as discrimination based on race, skin colour, sex, sexual orientation, gender identity, transgender status, marital status, pregnancy, parental status, religion, political opinions, nationality, ethnic origin, social origin, social status, indigenous status, disability, age, trade union membership or other employee representatives and any other characteristic protected by local laws governing the subject and/or policies of CONCETTI.

In the context of personnel management and development processes, as well as in the selection phase, the decisions made are based on the correspondence between expected profiles and profiles possessed.

The managers use and fully exploit all the professional skills present in the structure by activating the tools available to favour the development and growth of their employees and/or collaborators.

Personnel training takes place on the basis of specific work and professional development needs.

CONCETTI undertakes to ensure compliance with the provisions on health and safety at work as governed by current legislation.



The personal data of employees and collaborators are processed in compliance with the provisions contained in current legislation.

CONCETTI undertakes to protect the moral integrity of employees and collaborators by guaranteeing the right to working conditions that respect the dignity of the person. For this reason, it safeguards workers from acts of psychological violence, and counteracts any discriminatory or harmful attitude or behaviour of the person, their beliefs and preferences without any exclusion.

The collaborator and/or employee of CONCETTI who believes that they have been the object of harassment, or that they have been discriminated against for any reason, may report the incident to the Supervisory Body which will carry out the appropriate assessments.

CONCETTI prohibits any retaliation against the employee who has reported behaviour that does not comply with the present code of ethics. To this end, it has introduced a specific disciplinary system.

## **2.5 PROCESSING OF INFORMATION AND CONFIDENTIALITY**

Confidentiality is one of the main values that characterise CONCETTI. The privacy of individuals is protected by implementing national and international standards and the related methods of processing and storing personal data in compliance with company policies and various European and national regulations.

In processing personal data, CONCETTI respects all fundamental rights and complies with the freedoms and principles recognised by law, in particular respect for private and family life, home and communications, protection of personal data, freedom of thought, conscience and religion, freedom of expression and information.

In order to protect this value, CONCETTI's employees and collaborators are prohibited from accessing, using or disclosing information without the necessary prior authorisation. The prohibition of disclosure remains with the employee or the collaborator even in the event of termination of the relationship.

### **3. RULES OF CONDUCT**

#### **3.1 COMPLIANCE WITH PROCEDURES AND OPERATING INSTRUCTIONS**

CONCETTI has adopted an organisation, management and control model compliant with Legislative Decree 231/01 through the implementation of protocols, procedures and operating instructions aimed at regulating the management processes of the Company in order to reduce the risk of committing “predicate offences” in the interest and to the advantage of the Company itself.

Each operation and transaction carried out within the processes must therefore be supported by adequate, clear and complete documentation to be kept in the records, in order to allow at any time the control over the reasons, the characteristics of the operation and the precise identification of who, in the various phases, has authorised, carried out, registered and verified it.

Any non-compliance with the procedures and this code of ethics compromise the relationship of trust existing between CONCETTI and the subjects who, in any capacity, interact with it.

#### **3.2 PROTECTION OF HEALTH AND SAFETY AT WORK**

CONCETTI guarantees compliance with its duties relating to the health and safety of workers in compliance with current legislation, this ensuring a work environment that guarantees to all Recipients and in particular to employees and collaborators, in any capacity and at any level, conditions that are respectful of health, safety and personal dignity and in which the characteristics of single individuals cannot cause any discrimination or conditioning.

The subjects who, in various capacities, have relations with CONCETTI are bound to comply with current legislation and the relative procedures on the subject.

#### **3.3 CONFLICT OF INTEREST IN THE WORKPLACE**

CONCETTI intends to avoid conflicts between activities and personal and/or family interests and jobs performed in various capacities within CONCETTI, which may undermine the independence of choices. To this end, any situation that may be qualified as a conflict of interest, even potential, must be promptly reported to one’s own supervisor and to the Supervisory Body.

Specifically, the CONCETTI's employee who believes to be involved in a conflict of interest, even if apparent, is required to refrain from making decisions in relation to the processes or issues in which the conflict arises and communicate it following the methods established by company procedures.

#### **3.4. FINANCIAL AND ACCOUNTING MANAGEMENT**

Every operation and transaction made by CONCETTI must be legitimate, consistent and congruous, properly authorised and adequately recorded so that the relative decision-making, authorisation and execution process can be

verified in any moment. No financial transactions can be made in the absence of compliance with the procedures established by CONCETTI and in the absence of adequate supporting documentation. Without prejudice to the provisions of the Italian Civil Code, tax legislation and other national regulatory sources, CONCETTI's accounting system must allow, at any time, the timely assessment of every operation that involves the movement of incoming and outgoing means of payment, of the substantial reasons that led to its performance and of the persons who authorised its performance. CONCETTI, as a taxpayer, must correctly and promptly fulfil all the obligations imposed on it by the current tax regulations.

### **3.5 ENVIRONMENTAL PROTECTION**

CONCETTI recognises the environment as a primary value to be safeguarded and to this end it plans its activities by trying to obtain a balance between economic initiatives and essential environmental protection needs. In this context, CONCETTI limits the environmental impact of its activities, also taking into account the development of scientific research on the subject.

### **3.6 PRESENTS AND GIFTS**

No form of gift is allowed that can even be interpreted as exceeding normal business or courtesy practices or in any case aimed at acquiring favourable treatment in the conduct of any activity connected to CONCETTI. In particular, any form of gift to Italian and foreign public officials, auditors, members of the board of statutory auditors, or their family members, which may affect the independence of judgement or induce them to ensure any advantage, is prohibited.

## **4. CHECKS ON COMPLIANCE WITH THE CODE OF ETHICS**

### **4.1 DISCIPLINARY MEASURES**

The violation of the principles established in the Code of Ethics compromises the relationship of trust between CONCETTI and the Recipients.

Such violations will therefore be pursued by the Company incisively, promptly and immediately, through adequate and proportionate disciplinary measures, regardless of the possible criminal relevance of such conduct and the establishment of criminal proceedings in cases where they constitute a crime.

The task of supervising the functioning of and compliance with the OMCM and the Code of Ethics is entrusted to the Supervisory Body. To this end, a suitable disciplinary system has been implemented to sanction the failure to comply with the measures indicated in the OMCM and in the present Code of Ethics.

The effects of violations of the principles established in the aforementioned Codes must be taken into serious consideration by all Recipients: for this purpose, CONCETTI will disseminate the Code of Ethics and provide information on the sanctions envisaged in the event of violation and on the methods and procedures used for their application.

In order to protect its image and safeguard its resources, the Company does not entertain relations of any kind with subjects who do not intend to operate in strict compliance with current legislation, and/or who refuse to behave in compliance with the values and principles envisaged in the Code of Ethics and comply with company procedures.