



Ethical code

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PREMISE

Reinol srl is aware that the authority of a company is recognized not only by the competence of its collaborators and the high quality of the service provided to customers, but also by the attention paid to the needs of the entire community.

The principles that have always inspired the work of this Company are formally collected in a Code of Ethics of Conduct in the belief that reliability is built daily by respecting the rules and valuing people.

This Code of Ethics illustrates the set of ethical and moral principles that underlie the activity of Reinol Srl as well as the lines of conduct adopted by the Company both externally (in relations with institutions, suppliers, customers, partners trade, political and trade union organizations as well as the media) and within their own business (in relations between employees).

As proof of its commitment to policies that are always attentive to ethics and legality, Reinol Srl is one of the companies to which the Competition and Market Authority (AGCM) assigned, on 09/13/2022, the Rating of Legality with score:



This Code is binding for the directors and employees of Reinol srl, as well as for all those who work and collaborate, permanently or on a fixed-term basis, on behalf of the Company (hereinafter, the "Recipients").

the Code of Ethics is voluntarily adopted by Reinol srl and expresses values and principles of behaviour recognized as its own on which to call for compliance by all recipients, constituting the first tool for the prevention of any crime.

GENERAL PRINCIPLES

The conduct of the Recipients, at all company levels, is based on the principles of legality, correctness, non-discrimination, confidentiality, diligence and loyalty.

It is necessary that everyone carries out the assigned activities with commitment, contributing in a concrete way to the achievement of the corporate objectives and to the respect of the stated values.

Legality

Reinol srl operates in full compliance with the law and this Code.

All Recipients are therefore required to comply with all applicable regulations and to constantly update themselves on legislative developments.

The Company considers the transparency of financial statements and accounting to be a fundamental principle for the exercise of its business and for the protection of its reputation, therefore employees and/or collaborators must make any accounting entry accurately, promptly and completely, scrupulously respecting civil and tax legislation. All receipts and payments of Company funds must be properly recorded in our books and these must clearly state the nature and purpose of the Company's transactions.

One of the duties of our internal and external auditors is to ensure that we faithfully follow this rule. We will collaborate extensively with our auditors and for no reason will we refrain from providing them with any information in our possession, as the reliability of management facts and correct and timely registration represent one of the objectives always pursued by the Company.

Fairness

The Recipients are required not to establish any privileged relationship with third parties, which is the result of external solicitations aimed at obtaining improper advantages.

In carrying out their activities, the Recipients are required not to accept donations, favours or benefits of any kind (except for objects of modest value) and, in general, not to accept any counterpart in order to improperly grant advantages to third parties.

In turn, the Recipients must not make donations of money or goods to third parties or in any case offer illicit benefits or favours of any kind (except for objects of modest value or commercial courtesy gifts authorized by the Company) in connection with the activity they carry out. lent to the benefit of Reinol Srl.

The intrinsic conviction of acting in the interest of the Company does not exempt the Recipients from the obligation to punctually observe the rules and principles of this Code.

Non-discrimination

Reinol Srl avoids and repudiates any form of discrimination in the hiring, firing, remuneration policy, promotions or benefits offered to any employee, candidate or retiree on the basis of race, sex, religion, age, disability or any other illegal reason. Reinol Srl respects the privacy of its workers and does not harm their dignity in any way.

Confidentiality

Reinol Srl undertakes to ensure the protection and confidentiality of the personal data of the Recipients and Stakeholders, in compliance with all applicable legislation on the protection of personal data. The Recipients are required not to use confidential information, learned by reason of their work activity, for purposes unrelated to the exercise of this activity, and in any case to always act in compliance with the confidentiality obligations assumed by Reinol srl towards all Holders of Interests.

In particular, the Recipients are required to maintain the utmost confidentiality on documents suitable for revealing know-how, transport information, commercial information and corporate operations.

Reinol Srl undertakes to update, disseminate and enforce the "Policy" issued by the Company regarding the management, treatment and communication to the public of confidential information to which it calls the recipients to observe.

Diligence

The relationship between Reinol Srl and its employees is based on mutual trust: employees are, therefore, required to operate to promote the interests of the company, in compliance with the values set out in this Code. Recipients must refrain from any activity that could constitute a conflict with the interests of Reinol Srl by renouncing the pursuit of personal interests in conflict with the legitimate interests of the Company.

In cases where the possibility of the existence of a conflict of interest can be imagined, the Recipients are required to contact, without delay, their immediate superior so that the company can evaluate, and possibly authorise, the potentially conflicting activity.

In cases of violation, the Company will adopt all suitable measures to put an end to the conflict of interest, reserving the right to act for its own protection.

Loyalty

Reinol Srl and the Recipients undertake to create fair competition, in compliance with national and community legislation, in the awareness that virtuous competition constitutes a healthy incentive for innovation and development processes, and also protects the interests of consumers and the community.

CODE OF CONDUCT

Staff recruitment

The assessment of candidates is carried out on the basis of their correspondence to the profiles required by the Company. Personnel are hired solely on the basis of regular employment contracts, as no form of irregular work is tolerated.

The evaluation and selection of personnel are carried out according to correctness and transparency, respecting equal opportunities; Reinol Srl undertakes to adopt any useful measure to avoid any form of favoritism in the personnel selection process using objective and meritocratic criteria.

Staff Management

The Company is committed to offering equal employment and professional growth opportunities to all employees on the basis of professional skills and qualifications, without any discrimination, as well as any form of nepotism or favoritism. The Company undertakes to take care of the training of all employees and to encourage their participation in refresher courses and training programs

The Company applies labor legislation and the provisions of national and second-level collective bargaining agreements, and undertakes to:

- not to use child labor or forced labour;
 - respect the freedom of association and the right to collective bargaining;
 - ensure working conditions that prevent workers from possible injuries and illnesses, aiming at the full satisfaction of its personnel, be they partners or employees;
 - combat all forms of discrimination and ensure equal opportunities and fair treatment for all its members and employees, regardless of race, class, national origin, religion, disability, gender, sexual orientation, trade union membership, political affiliation and age;
 - carry out the selection taking into exclusive consideration objective elements such as competence, experience, education related to the functions to be filled;
 - fully and impartially apply the national collective labor agreement to all employees, punctually paying the established salary and paying all the related social security, welfare and insurance contributions.
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- contrast episodes of mobbing, stalking, psychological violence and any discriminatory behaviour or behaviour harmful to the dignity of the person inside and outside the company premises.

Staff duties

Employees undertake to avoid any situation that could lead to conflicts of interest with the company or that could interfere with the ability to make optimal decisions for the interest of Reinol Srl.

Employees cannot accept gifts that have more than a modest value or cash gifts from people or companies that have (or hope to have) business relationships with Reinol Srl.

Employees are required to protect the privacy and confidentiality of the information acquired due to their job function and in particular observe the confidentiality clauses required by the counterparties in compliance with current legislation. All information, data, knowledge acquired, processed and managed by employees in the exercise of their work are the property of Reinol Srl, must remain strictly confidential and suitably protected and may not be used, communicated or disclosed, nor internally or externally, except in compliance with company procedures and current legislation (Legislative Decree No. 196 of 06/30/2003 and EU Regulation 2016/679 and subsequent amendments).

Each employee is required to base their decisions on principles of sound and prudent management, through the careful assessment of potential risks, in the awareness that their choices contribute to the achievement of positive corporate results.

Each employee must take steps to protect company assets, using the resources entrusted to them with diligence and responsibility, adopting responsible behavior and in line with the procedures envisaged for their use.

Reinol Srl employees who use computer media, Internet connections and telephone sets, undertake to use them only and exclusively for the performance of their duties and on the basis of company procedures.

Every employee has the duty to collaborate with the judicial authorities in the context of investigations and trials conducted by this.

Relations with customers and suppliers

Recipients relate to third parties with courtesy, competence and professionalism, in the belief that the protection of the company's image and reputation and consequently the achievement of corporate objectives depend on their conduct.

Commercial relations must always be oriented towards compliance with all the rules pertaining to the correct management of industry and commerce, avoiding, in particular, fraudulent or illegal conduct.

In relations with Customers, Recipients are required to make a constant effort to offer punctual and high-quality services, trying to limit any form of disservice or delay in order to maximize customer satisfaction.

Relations with suppliers are based on loyalty, fairness and transparency.

The choice of suppliers is made on the basis of objective criteria of economy, opportunity and efficiency.

The choice of suppliers on purely subjective and personal grounds or, in any case, by virtue of conflicting interests with those of the company is precluded; in particular, in the process of selecting Suppliers, objective and transparent assessments of their professionalism and business structure, quality, price, methods of carrying out the service and delivery will be considered.

The initiation of commercial relationships with new Customers and new Suppliers and the management of existing ones is bound to the execution of every possible control to avoid maintaining relationships with subjects attributable to illegal activities or who are unable to comply with the principles fundamental ethical principles referred to in this Code.

WORK ENVIRONMENT

Reinol Srl undertakes to offer its personnel safe and healthy working conditions that respect the dignity of workers. Reinol Srl complies with the labor laws in force and actively undertakes, also through specific training programs, to implement everything in its power to prevent any accident at work. Employees are provided with information regarding the effects on Health, Safety and the Environment, of our products and the raw materials used, and information on how to handle and use them safely. We periodically review products and operations to verify that they comply with the provisions of the law

Reinol Srl adopts all measures to minimize the impact of its activity on the environment, scrupulously respecting both national and community environmental legislation.

ANTI-MONEY LAUNDERING AND CONFLICTS OF INTEREST

The Recipients of this Code must refrain from any activity that could constitute a conflict with the interests of Reinol Srl, renouncing the pursuit of personal interests in conflict with the legitimate interests of the Company. The Recipients of this Code must not, in any way and under any circumstances, run the risk of being involved in events relating to the laundering of money deriving from illegal or criminal activities.

METHOD OF IMPLEMENTATION

Dissemination and reporting

A copy of the code of ethics is sent by email to each Reinol Srl employee with a company email address; employees who do not have a company email are given a paper copy.

An updated copy of the Code of Ethics is also published on the company's website (www.reinol.it). Compliance with the provisions of this Code is entrusted to the prudent, reasonable and careful supervision of each of the Recipients, in the context of their respective roles and functions within the company.

All Recipients are invited to report to their direct superiors any facts and circumstances potentially in conflict with the principles and provisions of this Code.

Sanctions

The voluntary violation of this Code of Ethics will lead to the application by the company of disciplinary sanctions, obviously taking into account the general principles of proportionality and adequacy with respect to the alleged violation.

Entry into force

This Code of Ethics enters into force upon its approval by the Board of Directors. Any subsequent changes or additions must be approved with a specific resolution by the Board of Directors.