



ATELIER STIMAMIGLIO S.R.L.

Via Piazzon 1/3/5
36051- Creazzo (VI)

**ORGANIZATIONAL MANAGEMENT AND CONTROL
MODEL IN THE FIELD OF HEALTH AND SAFETY AT WORK**

*in compliance with art. 30 of Legislative Decree 81/2008 and amendments - Ministerial Decree 13
February 2014*

ETHICAL CODE

Premise

ATELIER STIMAMIGLIO S.R.L. considers it necessary to proceed with the adoption of a Code of Ethics and, as a tool for its implementation, considers it essential to proceed with the adoption and effective implementation of an organizational management and control model in the field of health and safety at work (hereinafter OMM) with the aim of guaranteeing a healthy and safe work environment.

This Code of Ethics is an integral part of the OMM of ATELIER STIMAMIGLIO S.R.L. defining the values and the general principles that characterize corporate ethics as well as the rules observance of which is of fundamental importance for the good functioning, reliability and reputation of ATELIER STIMAMIGLIO S.R.L. ATELIER STIMAMIGLIO S.R.L. undertakes to update the contents whenever the needs of the context, the reference legislation, and the company organization make it appropriate and necessary.

These values and principles must be embraced by the members of the Board of Directors, employees, collaborators, suppliers, customers, partners and, in general, all third parties who enter into relations with ATELIER STIMAMIGLIO S.R.L. in the context of their work, and all those who, directly or indirectly, on a permanent or temporary basis, establish relationships or operate in the interests of the same.

The BoD is responsible for any modification and / or integration of this Ethical Code and any update will be adopted with a subsequent resolution.

Purposes and methods of implementation

The purpose of this Code of Ethics is to encourage and encourage behaviors considered to be correct and to prohibit conduct that does not comply with the principles indicated, regardless of what is required by law and therefore by the penal consistency of the conduct itself; disseminating the values of correctness, loyalty and integrity that must shape the actions and behavior of the individuals who work for the company. Furthermore, the objective of this Code of Ethics is to disseminate a culture of legality, helping to maintain integrity, honesty and responsibility within the company and to keep the focus on how to manage areas at risk of criminal offenses.

The recipients of the Code of Ethics must behave in a manner that is compliant with the principles and rules of conduct set forth in this Code of Ethics in pursuit of corporate objectives and in all relations with the internal and external people and entities of ATELIER STIMAMIGLIO S.R.L.

ATELIER STIMAMIGLIO S.R.L. promotes and spreads a culture characterized by awareness of the usefulness and necessity of controls, promoting and effectively implementing an internal control system with the aim of ensuring compliance with the law and company procedures as well as efficiently managing activities, in line with the rules and principles of this Code of Ethics.

Each recipient of the Code of Ethics is responsible, for the part that is his responsibility, for the internal control system and for the compliance of his or her activity with the principles of the Code and with each company norm or procedure. In particular, all the recipients, within the scope of their functions, are responsible for the correct functioning of the internal control system through the effective implementation of all the control activities for which they are responsible, the observance of the procedures within their own job and their skills.

The subject responsible for monitoring and monitoring compliance with the provisions contained in this Code is the Supervisory Body, set up in compliance with the requirements contained in the Legislative Decree n. 231/2001 and has specific Regulations in which functions and tasks are explicitly stated.

Recipients of the Code of Ethics and knowledge of it

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

The conduct obligations set forth in this Code are extended, insofar as they are compatible, to all external collaborators and consultants, suppliers, customers and anyone who has dealings with ATELIER STIMAMIGLIO S.R.L with any type of contract or assignment and in any capacity.

To this end, ATELIER STIMAMIGLIO S.R.L. undertakes to inform all recipients of the existence of this Code of Ethics, to promote and disseminate an adequate knowledge of it, and to ensure that the provisions contained are respected by intervening, if necessary, with the corrective actions deemed most appropriate.

The Code of Ethics is brought to the attention of workers and all those with whom the company has business relations through appropriate communication tools. (for example through posting on the bulletin board, publication on the company website, training sessions, specific communications, etc.)

Principles of reference and rules of conduct

In achieving its objectives, ATELIER STIMAMIGLIO S.R.L embraces the following values, which are binding for the recipients of the Code of Ethics:

Legality, honesty, fairness

ATELIER STIMAMIGLIO S.R.L. operates in compliance with the laws and regulations in force, while professional ethics and internal procedures for this purpose ensure adequate training and a continuous awareness program on the issues pertaining to the Code of Ethics.

The pursuit of corporate interests can never justify conduct contrary to the principles of legality, correctness and honesty.

The recipients of the Code must regulate their conduct in a professional and responsible manner in order to avoid potential conflicts, ensuring fairness, collaboration, loyalty and mutual respect. ATELIER STIMAMIGLIO S.R.L. will begin no relationship or continue one with those who do not intend to align themselves with these principles.

Since it is an integral part of the OMM, failure to comply with the Code of Ethics will result in the application of sanctions appropriate to the seriousness of the violations committed.

Every employee of ATELIER STIMAMIGLIO S.R.L. must commit, first of all, to complying with the legislation on health and safety at work and any other requirements that ATELIER STIMAMIGLIO S.R.L. intends freely to introduce, and also undertakes to comply with this Code of Ethics and the OMM; this commitment and the sharing of the following values should also be extended to subjects external to the corporate structure (consultants, suppliers, customers, partners).

To give substance to these intentions, ATELIER STIMAMIGLIO SRL undertakes continuously to apply, monitor and improve an OMM that will be effective in preventing possible offenses in terms of health

and safety at work and which favors the pursuit of the objectives and strategic guidelines set forth below .

OBJECTIVES AND STRATEGIC ACTIONS:

- Observe the ethical principles of behavior contained in the principles of legality, protection of the human person, honesty, confidentiality, equity, equality;
- Comply with the requirements of current and future legislation on health and safety at work;
- Guarantee respect for the law not only by complying with present and future legislation, but also by paying particular attention to the prevention of potential offenses in order to minimize the risk of crime;
- Assessing and analyzing company processes and activities, identifying areas at risk (sensitive areas) and taking action to make possible improvements with the aim of eliminating or minimizing risk situations for occupational health and safety;
- Establish logical consequences and pursue objectives of innovation and continuous improvement in the field of safety in a perspective of prevention;
- Develop and maintain a leading role of the governing body for the promotion of the values of respect for the health and safety of workers on an ongoing basis;
- Ensure the correct application of the technologies used, and, where possible, pursue the improvement of these technologies or the adoption of more advanced technologies in terms of security;
- Ensure the involvement, participation and co-responsibility of all workers for the full sharing of the Code of Ethics and corporate objectives, for the development of a prevention-oriented culture, for the maintenance and development of safe working conditions;
- Ensure that all workers (both at the time of hiring and during the employment relationship) receive adequate information and training on the contents of this Code of Ethics, on health and safety at work regulations, on all issues of health and safety related to the activities of ATELIER STIMAMIGLIO SRL, on the OMM and on its implementation procedures, in order to make sure the implications regarding its own role in the company and its behavior at work are fully understood, and so that they are informed of their individual obligations but above all with the aim of increasing awareness and participation;
- Select suppliers according to the principles of the code of ethics, getting them to commit to the maintenance of behavior consistent with it;
- Prevent accidents or damage to the health of workers, including third-party companies that work inside the company;
- Ensure a reliable and complete system for collecting the data needed to manage the organizational model;
- Carry out checks, inspections (including surprise checks) and internal audits aimed at identifying and preventing any situations of non-compliance with the requirements adopted in the OMM;

- Elaborate and develop security plans containing measures and procedures necessary to prevent accidental or emergency situations and to contain their effects.
- Pursue an open and constructive attitude towards the public, and other users as well as cooperating with Trade Associations, and with other Institutional Interlocutors to raise awareness of health and safety at work values;
- Set up a monitoring system regarding the effective implementation of the aforementioned principles and the procedures for activating the reporting system in the event of ascertainment of violations;
- Subject the Code of Ethics to an annual review to assess its adequacy and make any additions in the light of concrete experience.

Protection of the person, health and safety at work

ATELIER STIMAMIGLIO SRL, considers human capital as a strategic resource and the safety and physical and moral integrity of workers as a fundamental value, and is committed to promoting compliance with current regulations and compliance with company safety and hygiene regulations at work through constant training activity, which aims to spread and consolidate a culture of safety and health at work, developing risk awareness and promoting responsible behavior in all employees.

ATELIER STIMAMIGLIO SRL promotes and implements any initiative aimed at eliminating risks and, where this is not possible, minimizing the risks and removing the causes that could jeopardize the safety and health of workers, carrying out technical and organizational interventions, particularly through the introduction of a risk assessment and management system regarding safety, and the resources to be protected in order to ensure that working conditions are carried out in safe working environments and by making efficient tools and properly maintained equipment available to its workers.

The Recipients of the code of ethics undertake in particular to:
 take care of their own safety and their own health and that of other people present in the workplace where they may be affected by their own actions or omissions, in accordance with their training and instructions and the means provided by the employer;
 report to the employer, manager or person in charge any anomalies and / or malfunctions in the use of work equipment and protective devices and in any case any other dangerous conditions of which any recipient becomes aware.

To achieve the objectives indicated, the Board of Directors (hereinafter, the BoD):

undertakes to guarantee human and instrumental resources and to prepare a specific budget;
 it also undertakes to ensure that the aspects relating to safety and health are fundamental in any future phase of defining new activities or in the control of existing ones; it reiterates its commitment to ensure that workers are informed, sensitized and adequately trained to carry out their activities safely, and undertake to periodically review this Code of Ethics to ensure that it remains relevant and appropriate to the organization.

This Code of Business Ethics is considered an integral part of the OMM, therefore any transgression will result in the application of sanctions appropriate to the seriousness of the violations committed.

The monitoring activities are documented through the preparation of specific reports.

The task of monitoring compliance with this Code of Ethics is the responsibility of the Supervisory Body, which reports to the Board of Directors.

a. Advertising information and training

In order to guarantee the maximum possible information, the managing body undertakes to bring its corporate Code of Ethics to the attention of all the subjects operating in the company, to collaborators with the organization, to third parties (suppliers, customers etc.) using the following methods:

- **the code will be displayed inside the company premises to allow visitors to view them,**
- **it will be published on the company website,**
- **for internal staff,** an informative and compulsory training meeting will be held by 30 October 2019, and information regarding this will be made public within the company. In case of doubt about correct behavior, employees may contact the SB directly.
- Knowledge will also be conveyed by certified mail or registered letter a.r. or recorded letter delivered by hand to the company doctor (CD), and to the territorial union representative (TUR);

b. Effectiveness of the Code of Ethics, obligations, reports, violations and penalties.

The behavior of all members of the corporate structure and third parties who, for various reasons, operate with the above will comply with the company rules and procedures as well as the contents of this Code and this is an essential part of their contractual obligations.

The provisions of this corporate Code of Ethics are intended as an integral part of the obligations assumed towards ATELIER STIMAMIGLIO S.R.L. on the part of the workers, the administrators, the subjects that carry out functions in matters of health and safety, of the collaborators and third parties in general; their violation must be the subject of a specific report to the SB and will be prosecuted according to the provisions of the disciplinary system envisaged by the OMM.

More precisely: anyone who becomes aware of non-compliant behaviors or violations of the Company's Code of Ethics by any person who has relations with ATELIER STIMAMIGLIO S.R.L. is required promptly to report the offense / irregularity to the Supervisory Body by following the procedure described in the paragraph "Procedure for reporting offenses and irregularities" of the OMM.

The report can be sent electronically via the dedicated e-mail box (odvatelierstimamiglio@avvocatoleoni.com.) or by paper report (to be placed in a sealed envelope inside the box located inside the company in the canteen) using the the appropriate form available to the company "Form for reporting illegal conduct".

As specified in the procedure section, for the reporting of offenses and irregularities of the OMM (referred to previously), any form of retaliation and discrimination against the reporting party for the report made is prohibited; the confidentiality of the informant's identity will also be guaranteed, without prejudice to legal obligations. Any forms of abuse of the reporting procedure will be subject to disciplinary procedures if reports that prove to be unfounded are intentionally or grossly negligent.

Communications can also be sent by ordinary post to the following address: "For the attention of the SURVEILLANCE BODY OF ATELIER STIMAMIGLIO S.R.L. Contrà Cantarane 3, 36100 Vicenza (VI)". ATELIER STIMAMIGLIO S.R.L. will activate the appropriate dedicated communication channels; in particular, a special e-mail box dedicated to the SB has been activated, to which any reports, communications, or any requests for clarification can be sent.

In implementation of the OMM adopted by ATELIER STIMAMIGLIO S.R.L., any violation of the provisions contained in the Code of Ethics will be assessed on the basis of the seriousness of the violation ascertained and considered as a source of disciplinary action, relevant also for the purposes of the civil, administrative and accounting responsibility of the perpetrator of the violation.

Violations of the Code of Ethics, by workers of ATELIER STIMAMIGLIO S.R.L. may constitute a breach of the obligations of the employment relationship or a disciplinary offense. in application of art. 7 of the Workers' Statute, of the current legislation and of what is established by the collective contract in force and in line with the procedure stipulated in the OMM for the application of sanctions.

Violations of the Code of Ethics by the members of the top management will lead to the adoption of the most suitable measures as provided for by the disciplinary system.

Even third parties (for example, agents, representatives, contractors, suppliers, customers, etc.), who have been properly instructed, must comply with the provisions contained in this Code of Ethics, in particular in relation to safety-related offenses stipulated in Legislative Decree 231/2001 (art. 25 septies and s.m.i.) and as defined by the OMM adopted by the company. Such violations may be considered as contractual non-compliance, and as such, justify the termination of existing contracts and lead to the adoption of adequate sanctions as specifically envisaged in the disciplinary system of the OMM. Details and further sanctions may be imposed by specific instructions of the BoD or subsequently introduced at the request of the SB.