



Stamperia Carcano Giuseppe Spa
via per Alzate, 31
22032 Albese con Cassano (CO) Italia
+39 031 429611
stamperia@carcano.it
www.carcano.it

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Organisation and Control Model pursuant to Legislative Decree 231/2001
Code of Ethics

Revision list

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1. INTRODUCTION

1.1. Our history

Stamperia Carcano Giuseppe Spa is a company operating in the metalworking and mechanical engineering industry since 1960. It was founded as a sole proprietorship by Mr. Giuseppe Carcano; subsequently, starting in 1978 and with successive intermediate progressive steps, it took on its present legal form as a joint-stock company with a restricted family base. It has established its registered office and production site in Albese con Cassano (CO) Via per Alzate n. 31. Today, the company is owned by Mr. Luca Carcano and Ms. Simonetta Franca Carcano. Mr. Luca Carcano also serves as the company's Sole Director.

The company's main production process is hot forging. From the onset, Stamperia Carcano has directed its production towards various sectors and, thanks to continuous investment, has achieved a high level of quality and reliability, so that it has acquired a pre-eminent position in the market. Since 1995, it has achieved ISO 9001 certification of its quality system, which is now adjusted and certified in accordance with the new editions of this standard. Stamperia Carcano is present in the rope and chain accessories sector; in line with its policy of continuous improvement, investments in recent years have mainly concerned lifting and anchoring products for the safe handling of large loads in the industrial, construction and maritime fields.

Since 2015, Stamperia Carcano has also adopted a *compliance* system in accordance with Legislative Decree No. 231/2001 through the adoption and continuous implementation of an Organisation, Management and Control Model.

Since 2017, Stamperia Carcano has also had a management system in compliance with the ISO 14001:2015 environmental standard, and since 2023 it has also been certified to the international ISO 45001:2018 occupational health and safety management standard.

Stamperia Carcano is also qualified and included in the supplier list of TERNA, ENEL, RFI, TELECOM and their affiliated large contractors. For this type of customer, Stamperia Carcano produces and supplies a wide range of specific accessories for anchoring high-voltage overhead power transmission lines, supporting contact lines for high and very high speed trains, and suspending traditional and/or fibre optic telephone lines. Stamperia Carcano has an in-house testing laboratory equipped with all the instruments required to test its accessories: horizontal and vertical machines for tensile tests, a tensile machine for fatigue cycles, a spectrometer for bench and portable 'X-ray' chemical analysis, magnaflux for crack detection, etc.

Thus, in 1997, the company was able to obtain approval from the German 'DGUV' with the accreditation of the 'H 92' mark for the production of grade 80/100 accessories in accordance with EN 818 and EN 1677 reference standards. The experience gained over the years in the lifting sector has allowed Stamperia Carcano to continue to be the only forging plant nationwide that can boast accreditation from the German 'DGUV' body.

1.2. Scope and effectiveness

This Code of Ethics describes the principles that inspire the relations of STAMPERIA CARCANO with stakeholders with respect to the company's activities.

Its adoption expresses STAMPERIA CARCANO's desire to make the ethical principles of economic management a reality in everyday business life.

The Code defines and recognises the legal relevance and compulsory effectiveness of the principles and values that the director, auditors, executives, employees, collaborators and third parties with whom STAMPERIA CARCANO has certain relationships (hereinafter referred to as "Recipients"), must observe and is an integral part of the Organisational Model pursuant to Legislative Decree 231/2001. It is adopted by STAMPERIA CARCANO with the approval of the Sole Director as an essential element of the company's strategy and organisation.

STAMPERIA CARCANO promotes knowledge of and compliance with the Code in relations with Recipients, also through specific contractual clauses. This commitment requires that external parties with whom STAMPERIA CARCANO has certain relationships also uphold it with rules and methods inspired by the same principles.

The Code is brought to the attention of internal and external Recipients by any means deemed appropriate, including publication on the company website.

The Company will also post the Code on the notice board pursuant to art. 7 of the Workers' Statute.

2. GUIDELINES

2.1. Impartiality

In the decisions affecting relations with stakeholders (the choice of which customers to serve, relations with shareholders, personnel management or work organisation, the selection and management of suppliers, relations with the surrounding community and the institutions representing it), STAMPERIA CARCANO avoids any discrimination on the basis of age, sex, sexual orientation, state of health, race, nationality, political opinions and religious beliefs of the parties it interacts with.

2.2. Honesty

In the context of their work and professional activities, the employees and collaborators of STAMPERIA CARCANO are required to comply with the laws in force, the Code of Ethics, the Organisation and Management Model adopted pursuant to Legislative Decree 231/2001, company procedures and formalised internal regulations. Under no circumstances may the pursuit of the interests of STAMPERIA CARCANO justify unlawful or fraudulent conduct and/or conduct in breach of the principles of honesty and fairness.

2.3. Segregation of duties

Every corporate operation must be performed in accordance with the authorisations set forth in the power and proxy system.

In particular, the operations identified as sensitive must be clearly documented, so that it is always possible to trace the decision-making and authorisation process that led to the completion of the operation.

In order to ensure an adequate segregation of duties and the proper management of transactions considered of particular significance, also with regard to their economic and financial aspect, it is essential that all transactions are not conducted and implemented by a single person.

The authorisation phase, the operational phase and the control phase must be entrusted to the responsibility of different actors in such a way as to ensure the application of the stated principles of transparency and clarity.

2.4. Shareholder relations

The shareholder, in order to orient him/herself in investment decisions and corporate resolutions, needs extensive and truthful information.

STAMPERIA CARCANO creates the conditions for informed shareholder participation in decisions within their competence and promotes equality of information.

2.5. Human resource enhancement

Employees and collaborators of STAMPERIA CARCANO are an indispensable factor in the company's success. For this reason, STAMPERIA CARCANO protects and promotes the value of human resources in order to improve and increase the wealth and competitiveness of the skills possessed by each of them.

2.6. Fairness of authority

In the management of contractual relationships involving the establishment of hierarchical relations - especially with collaborators - STAMPERIA CARCANO undertakes to ensure that authority is exercised fairly and correctly, avoiding any abuse thereof.

In particular, STAMPERIA CARCANO ensures that authority does not turn into an exercise of power detrimental to the dignity of the individual, and that work organisation choices safeguard the professional value of each individual.

2.7. Integrity of the person

STAMPERIA CARCANO guarantees the physical and moral integrity of its employees and ensures working conditions that respect individual dignity and a safe and healthy work environment.

Therefore, any conduct aimed at inducing persons to act against the law and the Code of Ethics, the Organisation, Management and Control Model, company procedures and regulations, or to adopt conduct detrimental to the moral and personal convictions of each person is not tolerated.

The adoption of an ISO 45001:2018 BS OHSAS 18001-compliant management system is an integral part of STAMPERIA CARCANO's safety policy.

2.8. Transparency and completeness of information

The collaborators of STAMPERIA CARCANO are obliged to give complete and accurate information, so that, when establishing relations with the company, the stakeholders are able to make informed decisions that respect the interests involved, the alternatives and the relevant consequences. In particular, when signing contracts, STAMPERIA CARCANO shall take care to specify to the contracting party the conduct to be adopted in all foreseen circumstances, in a clear and comprehensible manner.

2.9. Diligence and accuracy in the execution of duties and contracts

Contracts and work assignments must be performed in good faith.

2.10. Fairness and equity in the management and possible renegotiation of contracts

It must be avoided that in existing relationships, anyone acting in the name and on behalf of STAMPERIA CARCANO tries to take advantage of contractual gaps, or unforeseen events, to renegotiate the contract for the sole purpose of exploiting the position of dependence or weakness in which the party has found him/herself.

2.11. Quality of services and products

STAMPERIA CARCANO directs its activities towards customer satisfaction, striving for continuous improvement in product quality.

For this reason, STAMPERIA CARCANO focuses its research, development and marketing activities on high quality standards for its products.

The adoption of a management system compliant with UNI EN ISO 9001 is an integral part of STAMPERIA CARCANO's Quality policy.

2.12. Fair competition

STAMPERIA CARCANO intends to protect the value of fair competition by refraining from collusive, predatory behaviour and abuse of a dominant position.

2.13. Responsibility towards the community

STAMPERIA CARCANO is aware of the influence that its activities can have on the economic and social development of the community, as well as the importance of social acceptance in the communities that it operates in.

For this reason, STAMPERIA CARCANO intends to conduct its investments in a sustainable manner, respecting the environment and local and national communities.

2.14. Environmental protection

The environment is a primary asset that STAMPERIA CARCANO is committed to safeguarding.

STAMPERIA CARCANO is therefore committed to improving the impact of its activities on the environment and landscape, as well as preventing risks to the population and the environment, not only in compliance with current legislation, but also taking into account the development of scientific research and the best experiences in the field.

The adoption of a UNI EN ISO 14001-compliant management system is an integral part of STAMPERIA CARCANO's environmental policy.

3. BEHAVIOUR

3.1. Conflict of Interest

The term conflict of interest refers both to cases in which an employee or collaborator pursues an interest other than the company's mission or that of its stakeholders or takes 'personal' advantage of business

opportunities of the company, and to cases in which representatives of customers or suppliers or public institutions act contrary to the fiduciary duties associated with their position.

STAMPERIA CARCANO requires its directors, auditors, managers, employees, collaborators, to avoid any situation of conflict of interest, and to refrain from any activity that may oppose a personal interest to those of the company or that may hinder the ability to take, impartially and objectively, decisions in the interest of the company.

By way of example, conflicts of interest may arise from the following situations:

- holding corporate offices or performing work of any kind at customer, supplier, competitor sites;
- holding personal and/or family economic and financial interests in the businesses of suppliers, customers, competitors (such as, by way of example, holding direct or indirect qualified shareholdings in the share capital of such entities).

Any situation potentially giving rise to a conflict of interest, or in any case affecting the ability to make decisions in the best interests of the company, must be promptly reported by the person concerned to the company's administrative body.

3.2. Gifts, benefits or other advantages

STAMPERIA CARCANO does not tolerate any form of corruption and therefore Recipients must not offer, or receive from third parties, directly or indirectly, including on festive occasions, gifts, benefits or other advantages (in the form of money or of goods, services and utilities of any kind), except for gifts of modest value, falling within the limits of normal courtesy and not offered or accepted with the intention of influencing business decisions or creating obligations towards third parties. Any request for or offer of gifts, benefits or other advantages made to the Recipients, in addition to being rejected by the recipient, must be brought to the attention of the head of the competent corporate function, for any due assessment.

3.3. Social responsibility

STAMPERIA CARCANO carries out its activities in accordance with the principles of social and environmental responsibility.

3.4. Information and Confidentiality

The information reports of STAMPERIA CARCANO, shared both internally (co-workers, collaborators, shareholders) and externally (customers, suppliers, institutional parties) are drawn up according to the general principles contained in this Code. No confidential information relating to STAMPERIA CARCANO acquired or processed by the Recipients may be used, communicated to third parties or disseminated for purposes other than business purposes. Confidential information constitutes all information pertaining to the company learned in the course of work activities, the dissemination and use of which could cause danger or damage to the company. The obligation of confidentiality remains even after the termination of the relationship with the company, in accordance with current legislation.

3.5. Image protection

The Recipients shall maintain a decorous demeanour in the course of their work, wear clothes appropriate to the activity carried out and conforming to the standards required by STAMPERIA CARCANO, use respectful language in all forms of communication.

3.6. Safety in the workplace

STAMPERIA CARCANO carries out its activities in compliance with occupational health and safety regulations, in particular by ensuring:

- a safe and comfortable environment for its employees and collaborators in the performance of their professional services;
- adequate training and information on the subject.

STAMPERIA CARCANO requires the Recipients to:

- take care of the safety and health of themselves and that of other people;
- avoid all actions and omissions that may result in harm to the health and safety of themselves and that of other people;
- observe the health and safety provisions and instructions issued by the employer;
- immediately report to the employer any deficiencies in the safety means and devices as well as any other dangerous conditions that they become aware of, taking direct action, in the event of an emergency, within the limits of their powers and possibilities, to eliminate or reduce such deficiencies or dangers, and informing the workers' safety representative thereof;
- contribute actively, together with the employer, to the fulfilment of all obligations imposed by the competent authority or otherwise necessary to protect the safety and health of workers at work.

3.7. Computer security

STAMPERIA CARCANO requires its employees to ensure that the use of the company's IT resources is carried out in compliance with current legislation and the company regulations adopted by the company.

4. RELATIONS WITH STAKEHOLDERS

4.1. Accounting transparency

STAMPERIA CARCANO's main information tool is the company's balance sheet. Truthfulness, completeness and clarity of the elementary information are the necessary conditions for a transparent bookkeeping activity in order to guarantee that anyone can have a clear picture of the economic, asset and financial situation of STAMPERIA CARCANO.

In order to ensure that the accounts meet the above requirements, all supporting documentation of the business carried out in accordance with the relevant regulations, accounting principles and company procedures is kept.

STAMPERIA CARCANO adopts systems for the verification and control of accounting activities.

4.2 Relations with customers and suppliers

Each Recipient is responsible for understanding and responding to the different needs of customers by providing them with accurate, precise and comprehensive information on the products offered. STAMPERIA CARCANO pursues the fair, impartial and transparent selection of its suppliers through corporate directives contained in the appropriate internal procedures and refrains from engaging in relations with parties who are members of criminal organisations, including mafia-like organisations, or who exploit labour, including child labour, or who operate in violation of the regulations on the protection of workers' rights, as well as with subjects who operate for the purposes of national and/or international terrorism.

4.3 Relations with governments and public institutions, supervisory authorities, political and trade union organisations

STAMPERIA CARCANO's relations with public institutions are characterised by compliance with the provisions of the law, company procedures, and the values of fairness, impartiality, loyalty, honesty and transparency.

STAMPERIA CARCANO undertakes to fully and scrupulously implement the rules dictated by the public supervisory authorities for compliance with the regulations in force. Relations with the public administration, and political and trade union organisations are characterised by the principles of impartiality and independence.

4.4 Human resources

Human resources are the central element that STAMPERIA CARCANO relies on in the pursuit of its goals.

Professional development and growth are the cornerstones of human resource management.

Team spirit and a sense of belonging are key elements in achieving common goals effectively.

Personnel management is guided by these rules:

- *Selection, enhancing, training and management*

The selection and career development of staff is carried out without distinction of sex, race, language, religion, political opinion, personal and social conditions, and solely on the basis of verifying that the candidates possess the professional, behavioural and aptitude requirements laid down by the profile of the position to be filled. Evaluation and enhancement of individual merit, competence, skills and potential are the basis for human resources training, growth and remuneration initiatives.

- *Work environment and the protection of company assets*

STAMPERIA CARCANO pays constant attention to the health and quality of the work environment through scrupulous compliance with current occupational safety regulations. In this respect, it is committed to developing a work environment that guarantees the safety and health of all employees and collaborators.

Smoking, drug-taking and alcohol consumption are therefore not permitted in the workplace. Each employee is required to safeguard the company's assets, guarding and using with diligence movable and immovable property, technological resources and computer supports, equipment, company products and information.

- *Protection of privacy*

STAMPERIA CARCANO punctually applies the legal requirements concerning the processing of personal data. Each employee shall be informed of the nature of the personal data being processed, the processing methods and, in general, any data relating to his or her person.

- *Harassment and discrimination*

STAMPERIA CARCANO demands that harassment and discrimination of any kind against employees, suppliers and customers does not occur in internal and external labour relations.

4.5 Environmental protection

STAMPERIA CARCANO is committed to enforcing legislation on environmental protection and the preservation of natural resources. Respect for the environment is also implemented through a careful assessment of the impact of the business by ensuring that projects are compatible with the protection of the environment that they are developed in.

5 VIOLATIONS OF THE CODE OF ETHICS

All Recipients shall respect and promote the application of the Code of Ethics and disseminate the ethical principles and values of STAMPERIA CARCANO. The task of clarifying any interpretative doubts as well as the task of receiving reports of possible violations of the Code and proposing possible improvements to the provisions of the Code itself is entrusted to the Supervisory Board. Violation of the Code constitutes a breach of contract and/or, in the case of an employee, a disciplinary offence (in which case the sanctions set forth by current legislation and the National Collective Labour Agreement shall apply) and may entail the payment of compensation for any damage caused to STAMPERIA CARCANO

STAMPERIA CARCANO, in order to protect its image and to safeguard its resources, does not enter into relations with persons who do not accept or who violate the provisions of this Code of Ethics

6 INTERACTION BETWEEN THE CODE OF ETHICS AND THE ORGANISATION, MANAGEMENT AND CONTROL MODEL

This Code of Ethics forms an integral part of the existing company organisation system.

The values inspiring the Code of Ethics and the rules contained therein also constitute the starting point for an effective implementation, within the Company, of the Organisation, Management and Control Model that the Company has established and adopted by resolution of the Administrative Body.

7 IMPLEMENTING PROVISIONS

In order to pursue compliance with the principles of the Code, STAMPERIA CARCANO ensures:

1. maximum dissemination and accessibility;
2. uniform implementation;
3. carrying out checks on reports of violations thereof and applying the relevant sanctions;
4. periodic updating.