Officina meccanica

# Aldo De Tomasi srl

Via Trieste, 3 I-21015 LONATE POZZOLO (VA) Tel. +39 0331669178 - Fax +390331669264 e-mail: info@aldodetomasi.it

Cod. Fiscale e Partita IVA 02139250126

# **ETHIC CODE**

in full effect since July 18th, 2017; latest review: 14th Gen 2019

### Introduction

Officina Meccanica Aldo De Tomasi's (also referred to as Off. Mecc. Aldo De Tomasi) core values are based on people, security, teamworking, quality, satisfaction and clients' trust.

The company has always believed in these principles, that are a road path to any corporate decision as well as to any individual responsibility that both the administration and the working teams have to face daily.

This code is not to be taken as a replacement of these principles but as a guide to help us uphold them on a Daily.

The reputation of any corporation is a consequence of the behaviour of both the administration and the employees.

Every single person involved in any activity under the name of Off. Mecc. Aldo De Tomasi has to make sure that the reputation and integrity of the corporation is always preserved.

This ethic code cannot foresee every possible circumstance or problem, but it's been written to give a general scheme of the core values that Off. Mecc. Aldo De Tomasi wants to uphold in every and each of its activities.

Whenever an employee happens to have doubts concerning one of the following articles, he must discuss it with his team manager or with the administration.

## Requirements:

- Every employee and every administration member's actions must respect the principles of this ethic code;
- Every employee and every administration member will work upholding the law and those norms that rule their practices, respecting the highest moral and ethical standards;
- Off. Mecc. Aldo De Tomasi believes in equal rights. Race, skin colour, religion, sexual gender, sexual orientation, marital status, birth circumstances, age, genetics, disability,

military service and any other condition that is protected by lawful rights has and will always have <u>no influence</u> on any decision concerning employment, education, deployment, promotions, salaries, bonuses, dismissal or retirement.

- -Off. Mecc. Aldo De Tomasi vows to create a workplace free of any violence and threats. The security of every employee and administration member is vital and any form of violence is strictly forbidden, included threats, brawls, stalking, intimidations and the possess of firearms in the corporation properties.
- Off. Mecc. Aldo De Tomasi vows to create a workplace free of any kind of harassment, discrimination and retortions. Any form of harassment and discrimination is strictly forbidden. Retortions against any employee that lawfully signals illegal activities or immoral acts, both real or assumed as real, will not be tolerated.
- Off. Mecc. Aldo De Tomasi lawfully asks its employees and administration members for complete and unconditional loyalty. No employee or administration member can have relations or investments that can lead to a personal interest against those of Off. Mecc. Aldo De Tomasi and thus they must evade every of those circumstances that can lead to an alteration of their individual decisions in their daily tasks.
- Aldo De Tomasi's employees handle a consistent intellectual property and thus they must protect it in every circumstance, protecting patents, commercial strategies, commercial brands, copyrights, software, technical data and any other reserved information.

In the same way, Off. Mecc. Aldo De Tomasi respects the intellectual properties of others.

The unauthorized use of third parts' intellectual properties is strictly forbidden.

- Aldo De Tomasi's employees are in touch with confidential and reserved information; these include, for example, unpublished financial information and those reserved to clients and commercial partners.

The protection of these information is vital to guarantee long lasting relations and the corporate success.

No employee or administration member can discuss or share reserved information with anyone inside and out the properties of the corporation.

Those employees that handle reserved information, may be asked to accept the NDA as a contract requirement. The NDA might also be a requirement for specific projects or tasks.

### Employees' responsibilities:

- they must understand and work by the corporate policies.
- In the case of any doubt, they must ask their manager or a direction member.
- in the case of a possible law/norms/corporate policies violation, they must report it to their manager or to a direction member.
- Off. Mecc. Aldo De Tomasi has a zero-tolerance policy concerning retortions towards any act taken in good will.
- A person that has been reported must collaborate with Off. Mecc. Aldo De Tomasi to clarify what happened and must not take any action towards the person who forwarded the report.
- Whenever an employee is in the know of a law/norm/corporate-policy violation and doesn't forward any report, he will face consequences that may even lead to his dismissal.

# Direction's responsibilities:

- Every management member vows to create a workplace that pushes the values and principles of this code. They also have to make sure that every employee understood its content.
- Every report of violations of any law or norm has to be forwarded to the direction.
- This ethic code must be reviewed frequently to make sure it really reflects the corporation reality.

# Conformities, reports, derogations and reviews:

- Every employee must understand and work by the ethic code principles. In the case of any doubt, they must ask their manager or a direction member.
- The possibility of reporting actions against the law or norms by a member of Off. Mecc. Aldo De Tomasi and any other third part factory that works on a project, must be a certainty. It can also be forwarded anonymously.
- Those who violate this ethic code will face consequences that may lead to dismissal.
- Every review or amendment concerning this ethic code requires the direct approval of the corporate direction.

Lonate Pozzolo, 08/01//2024

Officina Meccanica Ado De Tomasi srl Nicola DE TOMASI

Via Trieste, 3 21015 - LONATE POZZOLO (Va) Tel. 0331669178 - Fax 0331669264 Cod. Fiscale e Partita Iva 03139250126 Nicola D. William (Va)