

ItalPressGauss
Employees Code of Conduct

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INTRODUCTION

With this code of conduct (hereinafter “code”) ItalPresseGauss S.r.l. intends to explain the ethical and behavioral principles that inextricably animate its internal life and its relationships with the outside world. Principles in which our company concretely believes and that, in order to be implemented, must be shared and followed by all its employees, without exception.

For this reason, in this code, in addition to a general explanation of the ethical and behavioral principles of ItalPresseGauss S.r.l., a series of specific rules will be explained that all employees must always follow. Finally, to make the content of the code clearer, some examples will be cited and the methods through which employees can obtain more information or clarifications will be provided, in case of doubts.

In our operational reality, cases or situations may always arise that will generate ethical or behavioral doubts. In such cases, employees must use the principles of this code as a moral guide and in more complex cases ask for assistance in the ways that will be explained from time to time.



1. FIGHTING CORPORATE SILENCE

There is no point in establishing rules if their violation is ignored. Every time an employee hears of a violation of this code, the law or of situations of dubious ethics, he or she has the duty not to look the other way and to act. Being silent or not acting, in many cases, means being an accomplice.

The first thing to do is to speak up and not turn away. In fact, the employee has the absolute duty to report the situation to his direct manager, to the company's legal counsel or to the director. While, if he believes that such a report could result in a risk of repercussions, to his or others' detriment, the employee can use our Whistleblowing channel, as explained on our website and in the specific training courses.

Written reports are preferable to verbal ones, especially in more serious cases, based on the ancient Latin maxim: “Verba volant, scripta manent”.

Where reports do not get a response, or results, do not hesitate and push.

In ItalPresseGauss spa, respect for the rules concerns everyone. Even if the violation does not directly harm an employee, he or she still has the duty to report it. Silence and indifference will never be tolerated.



2. HEALTH AND SAFETY

Health and safety are fundamental principles for life in ItalPresseGauss. The employer company has, in fact, the legal obligation to guarantee compliance with them in favor of its employees, collaborators and anyone else who has access to its premises. However, this is not possible without everyone's collaboration.

Employees must therefore diligently follow all safety instructions received from their managers and avoid exposing themselves to particularly dangerous situations.

The use of Personal Protective Equipment (PPE) is not only recommended, but absolutely mandatory. The employee must therefore always use them in the ways and places established by the managers and also by the company regulations. He must personally take care of the PPE and ensure that it is working correctly. In the event of faults or breakages, it will be his duty to report it to his manager, before carrying out any activity in which they are necessary.

Employees must also report all situations of serious danger to their own safety or that of anyone else. Finally, they must never carry out any activity if it exposes them to excessive danger, and in any case avoidable or reducible. In fact, every danger that you can avoid, if you do not avoid it, you risk it unnecessarily.

Employees must actively follow all safety training and any drills (e.g. fire prevention). They must also undergo all medical examinations required by law.

Employees who are responsible for selecting suppliers or external collaborators must personally verify that they comply with all safety regulations and request, if necessary, any documentation or certification required by law. These verification activities must always be recorded in writing.

Any contract, assignment of task or collaboration agreement with third parties must explicitly or implicitly state that the violation of any safety regulation may lead to its revocation or termination.

For safety reasons, ItalPresseGauss S.r.l. absolutely prohibits the consumption of alcoholic beverages and drugs, in its premises, and in any case, during working hours. Employees in their extra-work life must, however, consume such substances, in compliance with the laws in force, and in a way that does not cause problems to their lucidity, capacity and general work suitability. ItalPresseGauss S.r.l. reserves its right to take disciplinary action also against these latter conducts.

Finally, employees must respect the smoking bans, as established by ItalPresseGauss and in the case of business trips to third parties, by the latter.

Safety is a right, but also a duty for everyone.



3. PROHIBITION OF DISCRIMINATION

ItalPresseGauss S.r.l. does not tolerate any form of discrimination in any way.

Employees must always comply with all laws regarding the fight against discrimination. In managing their internal relationships, employees must always maintain a language and behavior that is respectful towards others, never discriminatory and aimed at inclusion.

Employees who are responsible for selecting and choosing external collaborators or suppliers must personally ensure that they follow the principles of non-discrimination. Furthermore, if the law requires it, it is advisable to request specific certifications relating to equal opportunities.

As in every winning team, ItalPresseGauss also believes that including is always better than excluding.



4. ENVIRONMENT

ItalPresseGauss respects the environment, as an inalienable heritage of the community.

Employees shall always comply with specific environmental and waste management regulations during their work activities.

There are several waste collectors in the company premises. Employees are requested to use them, according to the principles of separate waste collection.

To respect the environment, it is necessary that employees avoid waste of any kind and of any resource.



5. RESPECT AND FAIRNESS TOWARDS OTHERS

ItalPresseGauss S.r.l. strongly believes in the culture of respect and fairness.

In their working life, employees can never neglect the principles of respect and fairness towards others.

Employees must also always express themselves in a civil and as cordial manner as possible, especially in the most complex cases.

Employment law regulations must be scrupulously followed by all employees, especially those in senior positions.

No child labor or modern slavery will be tolerated in any way.

The employees of ItalPresseGauss S.r.l., when they have to choose a supplier or an external collaborator, must personally ensure that they also follow a policy of respect and correctness. Thus, they must verify that they do not employ workers, with an age below the minimum working age, for the country of employment and, in any case, never less than 16 years. Suppliers who do not comply with the regulations on worker safety and who commit violations of workers' rights, which are not minor, cannot be involved in the activity in any way.

Any conduct that is evasive or capable of limiting the control activity on the respect of workers' rights by the Competent Authorities is prohibited.

In our company there is a Single Trade Union Representation (RSU) and employees can also contact its representatives to obtain better respect for their rights.



6. RESPECT FOR WORK TOOLS AND OTHER COMPANY RESOURCES WITH ECONOMIC VALUE

To work well, it is necessary that the work tools are kept in good condition and that the availability of their use is not compromised. At the same time, any other company resource cannot be uselessly dispersed or wasted.

Employees must therefore treat with care all work tools entrusted to them and use them with care. They must ensure that the tools are working properly before and during their use. In the event of failures or defects, employees must promptly report it to their supervisor.

At the same time, ItalPressGauss S.r.l. protects all its other company resources with economic value. These include, for example, sums of money entrusted to employees for business reasons. Employees must use them according to company regulations and instructions given by their managers.

Any conduct of misappropriation will be promptly prosecuted under disciplinary law, and if appropriate also under criminal law.

Company cars are considered work tools.



7. PROTECTION OF PERSONAL DATA

ItalPressGauss S.r.l. protects the personal data processed during its activity. The company has set up a complex infrastructure to guarantee the protection of personal data in accordance with the law. The protection of personal data, processed by ItalPressGauss S.r.l. is a duty of all employees.

Personal data means all data relating to natural persons, to which the law attributes particular guarantees of protection. For example, personal data, contact information, salary data or other data relating to natural persons.

Data relating to legal entities are not personal data. For example, the company name, the name of the company or other data relating to companies or other legal entities are not personal data.

Employees must be guided by the principles of “ need to know ” and “ need to do ” by avoiding collecting, using, disseminating, even internally, deleting or destroying personal data, where such operations are not necessary for their activity.

Employees must archive such data in compliance with internal regulations, instructions given by their managers, as well as the internal privacy officer.

Where an employee must process personal data, the employee is required to comply with the disclosure obligations as required by law, by the internal privacy regulations, by his/her manager, or as established by the internal privacy manager.

Employees, in their relationships with third parties, must ensure that they also comply with the rules for the protection of personal data, as required by law. This obligation is particularly necessary in cases where a transfer of personal data from ItalPresseGauss to an external party or vice versa is envisaged.

Particularly sensitive are relationships with external professional firms (labour consultants, lawyers, etc.), for which employees must always comply with the obligations of this paragraph.

In any contract, appointment or task conferred to external parties, it must be established, explicitly or implicitly, that failure to comply with the legislation on the processing of personal data may result in termination or revocation, in addition to compensation for damages.



8. PROTECTION OF KNOW-HOW AND INDUSTRIAL PROPERTY.

For ItalPresseGauss S.r.l. its Know How constitutes an essential value.

These rules intend to protect all strategic, commercial, technical-industrial or other information, the nature of which suggests that there is a corporate interest in its secrecy and the disclosure of which could cause damage to corporate interests.

Employees must respect the “ need to know” principle by avoiding disseminating their own commercial, strategic, technical or industrial information unless strictly necessary.

If the relationship with external parties involves sharing or disseminating the information mentioned above, employees may carry out such sharing or dissemination only after having obtained from the external party the signing of a specific Non Disclosure Agreement (NDA). NDAs must comply with company standards and be approved by the internal lawyer.

Employees may not use or disseminate such information for reasons other than the interests of ItalPresseGauss S.r.l.

Employees are required to comply with all cybersecurity regulations and avoid practices that are dangerous for the confidentiality of company know-how.

Sharing of industrial construction drawings with third parties is prohibited unless expressly authorized by the director.

Employees are required to respect, in accordance with the provisions of this paragraph, any other information belonging to third parties, of which they have become aware by virtue of their office.



9. CYBERSECURITY AND SOCIAL MEDIA

Cybersecurity is essential to avoid unnecessary damage to ItalPresseGauss S.r.l., or to those with whom it has commercial interactions. At the same time, employees must use social media in a way that does not unfairly compromise company interests.

Employees will therefore have to comply with all Cybersecurity regulations given by their managers. Furthermore, they will have to use work IT devices responsibly and avoiding behaviors that may pose risks to corporate cybersecurity. When surfing the web, employees are advised to avoid particularly dangerous sites.

When using email, employees must ensure that they do not click on suspicious links or images. If they receive suspicious emails, for cybersecurity reasons, employees must report them to their manager or IT manager.

It is forbidden to connect your personal devices to the telematic work tools, even for the mere reason of recharging the battery. Just as it is forbidden to save company data or information on your personal devices (cell phones, etc.).

Only authorized employees will be able to use the social network channels of ItalPresseGauss S.r.l., in compliance with the principles of correctness and respect for company interests. Except in these cases, employees will not be able to use the name of ItalPresseGauss S.r.l. on social networks

When using their personal social networks, employees must refrain from defamatory conduct towards ItalPresseGauss S.r.l., its collaborators, customers, managers, partners, supervisory bodies, trade unions, mayors or employees.



10. FIGHT AGAINST CORRUPTION

ItalPresseGauss S.r.l. does not tolerate any corrupt conduct of public officials, public service employees or between private individuals.

Corruption of public officials or persons in charge of a public service is understood to mean any activity of commercialization of a public function or public office, whereby a person confers upon the latter any undue benefit in order to obtain the exercise, proper or improper, of public functions.

On the other hand, corruption between private individuals is understood to mean the action of a person aimed at unduly influencing the discretionary or representative powers of a person operating for a capital company, through the granting of any benefit.

For these reasons, employees may deal with the public administration only in writing, or in no less than two people, if the dealings are oral. They must respect all other necessary precautions, aimed at avoiding cases of corruption. Any promise of money or other undue benefit by employees towards public functionaries or public service officers is prohibited. Employees must always respect the rules established by the competitive procedures, provided for on a case-by-case basis by the public administration.

In relation to private individuals, having discretionary powers or representing other companies, employees may confer gifts or other benefits, only for a modest economic value.

It is preferable that any payment be made in a traceable manner and upon presentation of the related invoice. Where this is not possible, such payment must be authorised by the director.

It is forbidden to make political donations or contributions on behalf of ItalPresseGauss S.r.l..



11. INSIDE TRADING

Inside trading practices are prohibited. These practices occur when an employee uses privileged information, by virtue of his/her duties, and uses it to carry out financial transactions or financial speculation. This also occurs through disclosure to third parties.



Marco Gandini

CEO
ItalPresseGauss S.r.l.