

# **PULVERIT S.p.A. CODE of ETHICS**

**Milan 2019**

## 1. The Fundamental Values of Pulverit S.p.A.

The fundamental values of Pulverit are addressed to the Company, understood both as a company and as an element of society. Said values are:

- **Transparency**, communicating strategies, objectives and results;
  - **Health and Safety in the workplace**, adopting a management system that complies with the BS OHSAS 18001 standard;
  - **Attention to individuals** by helping them build their identity and getting them involved in the company, training them and making them become more aware;
  - **Responsibility towards the environment and the community**, by continuously reducing environmental impact and increasing the development of products that are less and less harmful to the environment, inspired by the organizational model established in the ISO 14001 standard;
  - **Credibility**, assessing results obtained on the basis of the objectives set for Improvement;
  - **Reputation**, to guarantee growth and development of the group
  - **Reliability**, as the best expression of trust from the Clients, employees and competitors.
- For more than 45 years, all these values have supported the birth and growth of our group.
- This Code of Conduct is the tool for communicating to everyone our corporate values, and all employees and contractors must be familiar and comply with it meeting our corporate values. The implementation of the Code of Ethics is also a task to be carried out through the Organizational Model and by specific Procedures disclosed to the concerned parties, as needed.

## 2. The recipients of this Code of Ethics and application

This Code of Conduct is the tool adopted by the Company to communicate its values to all parties involved. All employees and contractors must be familiar with it and apply this Code of Conduct. The Code of Conduct is also notified - in abbreviated form if necessary - to clients and suppliers of the Company, and for the latter the values detailed herein are in fact a contractual requirement that must be complied with at all times.

Compliance with this Code of Conduct is an integral part of the contractual obligations of the Company's Employees, also pursuant to and for the purposes of art. 2104 of the Civil Code. A breach of this Code may constitute breach of contract and/or a disciplinary offense and, where appropriate, may result in a request for damages that the Company may have suffered as a result of said violation, in accordance with current legislation and collective agreements, as applicable from time to time.

Pulverit personnel (employees and contractors) must, when necessary, inform external personnel of the obligations deriving from this Code. In addition, they must immediately inform their corporate contact or the Supervisory Board of any violation of the principles set out herein.

## 3. General Principles of the Code of Ethics

Pulverit general principles are the following:

***.Pulverit has as its fundamental principle, compliance with the laws and regulations in force in all countries where it operates.***

Every Pulverit employee must comply with the laws and regulations in force in all countries where Pulverit operates, either directly or through agencies and/or representatives.

This commitment also applies to consultants, suppliers, clients and anyone who has relationships with Pulverit, which will not start or continue any relationship with anyone who does not intend to comply with this principle.

Employees must be aware of the laws and related conduct they must observe. In case of any doubt on how to proceed, Pulverit makes available a legal office through its management in order to adequately inform its employees.

Pulverit is committed to implement an adequate and ongoing training and awareness

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program on issues related to the Code of Ethics.

- ***Every operation and transaction must be properly recorded, authorized, verifiable, legitimate, consistent and appropriate.***

All Pulverit actions and operations are properly recorded and the decision, authorization and implementation process can be verified.

Adequate documentation support is available for each operation in order to be able to carry out inspections at any time to certify the characteristics and reasons of the operation and identify those who authorized, carried out, recorded and checked said operation.

- ***Basic principles regarding the relationship with Pulverit partners: Public Administration, public employees and private companies.***

Offering money or gifts to managers, officials or employees of the Public Administration or to their relatives, whether Italian or from other countries, is not allowed, except in the case of gifts or benefits of a marginal value.

Illegal payments made directly by Italian entities or their employees, as well as illegal payments made through persons acting on behalf of such bodies both in Italy and abroad, are considered acts of corruption.

Offering or accepting any item, service, performance or favor of value in order to obtain more favorable treatment in relation to any relationship with the Public Administration is forbidden. In those countries where it is usual to offer gifts to clients or others, it is possible to do so if these gifts are of an appropriate nature and of a marginal value, but always in compliance with the law. However, this should never be interpreted as seeking favors.

When any business negotiation, request or relationship with the Public Administration is in progress, personnel in charge must not try to improperly affect the decisions of the other party, including those of officials who negotiate or make decisions on behalf of the Public Administration.

In the specific case of a bid for tender with the Public Administration, it is essential to operate in compliance with the law and good business practice.

If Pulverit uses a consultant or a "third party" to represent it in its relationships with the Public Administration, the same guidelines valid for the company's employees also apply to the consulting firm and its staff or to the "third party"

Pulverit refuses to be represented, in its relationships with the Public Administration, by a consultant or a "third party" when conflicts of interest may arise.

In the course of a business negotiation, request or business relationship with the Public Administration, the following actions must not be taken (directly or indirectly):

- examining or proposing employment and/or commercial opportunities that may personally benefit employees of the Public Administration;
- offer or in any way provide gifts;
- urging or obtaining confidential information that could compromise the integrity or reputation of both parties.

Pulverit cannot hire former employees of the Public Administration (or their relatives) who personally and actively participated in business negotiations, or endorse requests made by the body to the Public Administration. If a Pulverit employee or contractor becomes aware of any breach (actual or potential), he or she must promptly report it to the competent internal departments, in particular to the Supervisory Board. Pulverit may contribute to finance political parties, committees, public organizations or political candidates, as long as the regulations in force are complied with.

#### **4. Occupational Health, Safety and Environmental Protection Principles**

**Pulverit deems the health and safety of its employees and contractors of the utmost importance in its corporate management.**

Based on this principle:

- All decisions of all kinds and at all levels are taken in such a way that highest priority is given to health and safety in the workplace. In particular, decisions are taken in such a way as to:
  - a) avoid risks;
  - b) assess risks that cannot be avoided;
  - c) fight risks at their source;

- d) adapt the work to the worker, in particular regarding the design of the workplace and the choice of work equipment and work and production methods, by reducing boring and repetitive work and the effects of said work on health;
- e) take into account technological development;
- f) replace what is hazardous with what is not hazardous or less hazardous;
- g) plan prevention aiming for a consistent whole that integrates technique, work organization, work conditions, social relationships and the effect of the environment factors in the workplace;
- h) give priority to collective protection measures rather than individual protection measures;
- i) provide appropriate instructions to workers.

In order to implement these principles, Pulverit adopted a management system that complies with the requirements of the BS OHSAS 18001:2007 standard, and to implement safety management in accordance with the BBS (Behavior Based Safety) principles.

The company, both at the top management and operational levels, must comply with these principles, in particular when decisions or choices must be made and, subsequently, when they must be implemented (see art. 6, paragraph 2, letter b), Legislative Decree No. 231/2001).

• Pulverit operates with the utmost respect for the environment, minimizing direct and indirect impacts.

Based on this principle, the following is not allowed:

- unlawful discharge, emission or introduction of ionizing substances or radiation into air, soil or water;
- illegal collection, transportation, recovery or disposal of waste;
- illegal shipment of waste;
- illegal and unauthorized operation within its own site of a plant where hazardous activities are carried out or hazardous substances or preparations are stored or used;
- the production, processing, treatment, use, preservation, storage, transportation, import, export and disposal of nuclear materials or other

hazardous radioactive substances;

- killing, destruction, possession or collection of specimens of wild protected animal or plant species;
- the trade of specimens of protected wild fauna and flora;
- any action causing significant deterioration to a habitat within a protected site;
- the production, import, export, placing on the market or use of ozone-depleting substances.

In order to implement these principles, Pulverit adopted a management system that complies with the requirements of the ISO 14001:2015 standard,

The company, both at the top management and operational levels, must comply with these principles, in particular when decisions or choices must be made and, subsequently, when they must be implemented (see art. 6, paragraph 2, letter b), Legislative Decree No. 231/2001).

## **5. The Penalty System**

Adhesion to this Code of Ethics is fundamental for all Pulverit employees. All personnel, whether employees or contractors must comply with and ensure compliance with this Code of Ethics.

Breaches to the Code of Ethics are punished in accordance with the provisions of the law. In particular, for employees, reference is made to the Labor Statute and the current CCNL (National Collective Labor Agreement), including corporate managers. In the case of contractors who are not Pulverit's employees, the penalties for breaching the Code of Ethics are described in the contracts signed with them.

## **Notes and references.**

Main laws and references used in drawing up the Code of Ethics.

- Legislative Decree 231/2001 and subsequent amendments and integrations.
- Confindustria Guidelines "Guidelines for the preparation of organization, management and control models pursuant to Legislative Decree No. 231/2001
- Legislative Decree 81/2008 and subsequent amendments and integrations.
- Legislative Decree 152/01 and subsequent amendments and additions.
- Directive 99/2008/EC
- Workers' Statute
- CCNL Chemical Industry.
- Organizational Model, Corporate Management System and Internal Pulverit Procedures.