

Hot metal molding - Mold construction

***CODE OF ETHICS***

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# Introduction

Euro Stampaggi S.p.A., already Nuova Si.Co. S.n.c, founded in 1979, is growing and developing using the most modern technologies for the manufacture of molds and hot stamping of brass, aluminum, copper, silver and bronze.

As the primary reference for the field of high fashion in the sector of metal accessories, the company makes of the quality of the products and the speed of delivery their strengths and it is for this reason that their main customers are the most important international brands.

Euro Stampaggi S.p.A. makes use of highly specialized and experienced staff and is able to follow the customer from the ideation stage of the product, creating suitable equipment internally, and hot forming semi-finished products. The organization, combined with the experience and professionalism of the staff makes Euro Stampaggi S.p.A. represents an example of reliability and expertise in the world of hot pressing. The company, although today has reached a size of industrial structure, has maintained its crafts features, made of creativity and inventiveness typically Italian.

In this context, the preparation of the Code of Ethics is part of a process that began in 2004 with the implementation of its Quality System in compliance with UNI EN ISO 9001, with the implementation in 2012 of the Environmental Management System in accordance with ISO 14001, and finally in 2013 with the implementation of Social Management System in compliance with the SA 8000.

In recent years, the issue of social responsibility has emerged as a requirement increasingly strong and central. The ethical aspects of fairness, accountability, transparency, respect for human rights, the environment, sustainable development, innovation and product quality, are becoming increasingly important in the management of the business activities and, more generally, in society.

The ethical commitment of Euro Stampaggi S.p.A. materialized with:

• Drafting of a Corporate Policy (Integrated Quality, Environment and Social Responsibility).

• Design and implementation of an Integrated Management System (ISO 9001, 14001 and SA 8000).

The need to draw up a Code of Ethics stems from the awareness that the integrity, reputation and profitability depend primarily on the individual behavior of its directors, employees, contractors, sub-contractors and suppliers. This document is not prepared in accordance with Legislative Decree no. 231/01 (Organizational models 231).

The Code of Ethics is intended, therefore, to define the principles, values and behaviors that daily must inspire the activities of Euro Stampaggi SpA. Therefore, this document is an expression of the core values of the company and is a reference point for each decision-making process.

The Code of Ethics should be used as a guide and therefore:

• Every employee and collaborator is personally responsible for compliance with the Code of Ethics and should always comply with it.

• Euro Stampaggi SpA Suppliers and Sub-Contractors are invited to review and comply with the social commitments, environmental and quality of the products defined in this document and to sign the letter of commitment.

• All other stakeholders are invited to read it carefully and to keep in mind the content.

Ethics, the fulfillment of the rules of interest of the company in accordance with its activities, products and processes (environmental rules, of safety, products, workplace etc.), Are a responsibility that Euro Stampaggi SpA intends to share with its business partners and all stakeholders.

Anyone who becomes aware of situations that may seem not comply with the ethical values and standards of behavior of the Code, shall inform the Directorate or the Head of the Management System of Social Responsibility or the Workers' Representative for Social Responsibility.

# Mission and Morals of EURO STAMPAGGI S.p.A

Euro Stampaggi S.p.A. agrees to comply with the standards of professional and ethical conduct to employees, contractors and all other corporate stakeholders: customers, suppliers, associations, institutions, and local communities. This commitment and the responsibility it entails, is summarized below.

## Collaborators

In respect of its staff (employees, temporary workers, etc.). Euro Stampaggi S.p.A. is committed, through the implementation, maintenance and continuous improvement of its Integrated Management System and in compliance with UNI EN ISO 9001, ISO 14001 and SA 8000 in compliance with the ethical principles followed:

* Provide quality products in accordance with customer requirements and regulatory requirements applicable to the product.
* Do not use or encourage the use of child labor.
* Do not use or encourage the use of forced labor.
* Provide all employees with a safe and healthy workplace.
* Respect the right of workers to join and form trade unions.
* Do not discriminate of any kind.
* Do not use or encourage corporal punishment, mental or physical coercion and verbal abuse.
* Ensure the compliance with the minimum wage required by law and by the National Collective Labour.
* Operate in accordance with international law and national product, environment, safety, and work of the National Collective Labor.

Euro Stampaggi S.p.A. is required to act fairly in relation to each other, and to implement an employment policy based on equality of opportunity for all employees and contractors, dialogue, listening for any needs and requirements of each in order to create an environment pleasant working environment, an atmosphere in which it encourages the open exchange of views and loyal, and encourage the pursuit of well-being of staff.

Euro Stampaggi S.p.A. recognizes the right of everyone to the confidentiality of his private life, and gives priority to the care of the employees, their health and safety at work, professional growth and personal satisfaction and motivation.

## Environment

The commitment of Euro Stampaggi S.p.A. with respect to the Earth is designed to preserve the bounty and beauty for present and future generations, in order to transmit their values ​​and traditions that support the long-term development of human communities and the environment.

Euro Stampaggi S.p.A. engages in every phase of the act to apply a precautionary approach to the environment and its biodiversity, to undertake initiatives to promote greater environmental responsibility company, to develop the commitment of resources and technologies that do not harm the environment and exploitation of renewable energy sources.

## Associations and NGO

In respect of all the associations and NGOs with which Euro Stampaggi S.p.A. communicates and collaborates in various ways, the company is committed to encouraging the exchange of information, dialogue and transparency.

## Product

The product is at the center of all activities and daily commitment. Euro Stampaggi S.p.A. focuses and increasingly focus its efforts on innovation to create products of increasing quality and in compliance with laws and regulations and techniques applicable industry.

## Clients

Customers are partners to achieve success in business. To all customer, the company is required to provide high quality, professionalism, excellence, fair prices and honest behavior, in order to pursue their satisfaction on an ongoing basis. Relations should always be based on the principles of legality, morality, transparency and professional integrity.

## Suppliers

Suppliers are partners to achieve success in business. The company is required to treat the suppliers fairly. Should be encouraged fair competition, without discrimination or unfair practices, aiming at enhancing the creation of lasting business relationships and based on fairness and transparency.

## Competitors

Competitors are the positive stimulus to improve and remain competitive. Euro Stampaggi S.p.A. is animated by a strong and fair competitive spirit aimed at continuous improvement of what it does.

## Other stakeholders

Euro Stampaggi S.p.A. is expected to behave responsibly in the local community in which it operates, in compliance with all national and local laws, pledging to improve the quality of life through the promotion of awareness on issues related to the protection of human rights as well as to growth, professional development of young people and to the environment.

## Institutions

Euro Stampaggi S.p.A. is committed to maintaining an open and transparent to all national, regional and local authorities with which interacts with

# Commitments of EURO STAMPAGGI S.p.A.

## Commitment to Employees and Collaborators

Euro Stampaggi S.p.A.:

* Do not use and do not in any way intended to support the use of child labor.
* Do not use and do not in any way intended to support the use of forced labor. It is committed to ensuring that all employees are fully aware of their rights and obligations arising from the employment contract.
* Ensures all employees a safe and healthy workplace by complying with the legislation, training, information and ongoing training on health and safety, willingness to undergo verification and audit by the supervisory authorities and to take all necessary actions to minimize the causes of hazards inherent in the working environment.
* Respect the right of workers to join trade unions of their choice and the right to participate in collective bargaining.
* It is committed to a policy of not encouraging discriminatory practices in hiring, remuneration, access to training, promotion, termination or retirement based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, age. It is committed to providing equal opportunities to all employees and equal employment opportunities to new qualified candidates. Will operate with utmost respect for privacy and dignity of workers.
* Do not use and do not in any way intended to support the use of corporal punishment, mental or physical coercion, and verbal abuse. Any disciplinary action applied to the employees shall be implemented in full compliance with the Workers' Statute and the Collective Bargaining Agreement applied.
* Is required to comply fully in employment, international law and domestic labor.
* Is required to operate in compliance with the privacy and dignity of employees and consultants. Takes and records only those data that are necessary for the efficient management of personnel or that are required by law. Access to such information should be limited only to those who have an objective need to become aware of (supervisory authority). The company is required to comply with all applicable laws regarding the disclosure of employee personal information. Compliance by Euro Stampaggi S.p.A. the dignity of the private lives of employees and prohibits any interference in the conduct of the same outside of the workplace, if such conduct is detrimental to performance on the job or which damages the company's reputation.
* Is committed to providing timely information relevant to employees and contractors about the company, performance, relationships with customers and the performance of the employees and collaborators. He set up a communication channel anonymous or not, which allows employees and partners to openly opinions, attitudes and concerns.
* Is committed to ensuring an adequate response to anonymous or signed reports/ complaints received. No penalty will be imposed on those employees and contractors who provide any reports or manifest any problems or complaints, and will guarantee them protection from any retaliation.
* Commits to stimulate training and professional development of employees and encouraging them to improve and increase their skills.

## Commitment to Suppliers and Sub-Contractors

The company policy of Euro Stampaggi S.p.A. in the purchase of equipment, materials, services, commodities and so on, is based on the intrinsic value of the same. Vendors, service providers and sub-contractors of the Euro Stampaggi SpA should be treated fairly, justly and without discrimination.

Euro Stampaggi S.p.A.:

• Undertake to ensure payments on time deliveries under the contract or purchase order.  
• Is committed to fostering a working relationship based on trust, on the exchange of information, transparency and professional integrity.

• It bound to respect confidential information and trade secrets of Suppliers and Sub-Contractors.  
• It is committed to a policy designed to inform Suppliers and Sub-Contractors of any administrative or accounting error and to correct any errors immediately with credits, refunds or other measures acceptable to both parties.

## Commitment to Clients

Euro Stampaggi S.p.A.:

• Is committed to designing and manufacturing products by seeking the best quality and professionalism.  
• Is required to understand the needs of customers and satisfy them by offering quality products at competitive prices and conditions.

• Is required to sell products in an honest way, based on the intrinsic qualities of the same and to refrain from selling the success of which requires an illegal act or violation of rules in general.

• It bound to respect confidential information and data relating to the Customer in its possession.  
• It is committed to a policy to inform customers of any administrative or accounting error and to correct any errors immediately with credits, refunds or other measures acceptable to both parties.

## Commitment toward other stakeholders

Euro Stampaggi S.p.A. is an "actor" socially engaged and follows a policy to notify all interested parties outside their social and ethical performance through direct dialogue and through the medium of the Social SA8000.

• Is committed to actively supporting organizations and social activities of the community in which it operates. Encourage employees and contractors to participate in public life.

• Is committed to promoting the issue of respect for human rights, with particular attention to the protection of children and young workers employed in hazardous work activities.

# Rules of Conduct

## The commitment of the employees and collaborators against EURO STAMPAGGI S.p.A

**Child Labor**

All employees are required to disclose any information in its possession on cases of child labor at the suppliers or sub-contractors Euro Stampaggi S.p.A.

**Health and safety at work**

In order to protect the health and safety of employees and customers of Euro Stampaggi SpA, all employees are required to:

• Comply with and observe all safety procedures in the performance of their work.  
• Do not smoke in the company, let alone in the bathroom and in any case outside the designated areas and made available by the company.

• Report to the Head of the Prevention and Protection Service any information that might prevent the occurrence of an event detrimental to the health of employees and customers.

**Discrimination**Workers are not required to implement any kind of discriminatory practices towards their co-workers, any new employees, as well as having behavior that is contrary to a constructive attitude. The relationships between people must be inspired by the principles of mutual respect and dignity of people.

**Abuse of drugs and alcohol**

All staff are required to comply with applicable laws and regulations regarding the possession or use of alcohol or drugs. Euro Stampaggi SpA, prohibits the illegal use, sale, purchase, transfer, possession or presence of drugs on the premises and in company premises, except medications prescribed by a doctor. The company also prohibits the use, sale, purchase, transfer or possession of alcohol by employees on the premises and appurtenances

**Protection of tangible and intangible assets of Euro Stampaggi S.p.A.**

The assets of Euro Stampaggi S.p.A. consists of the physical goods materials, such as computers, printers, work equipment, installations etc. and intangibles such as, for example, confidential information, know-how and knowledge. The protection and conservation of these assets and information is a fundamental value for the protection of the interests of the company, and care of the staff (in the performance of their work), not only to protect these assets and information, but prevent fraudulent use or improper. For this purpose, pictures and videos are strictly forbidden even if it’s recreational or sharing purpose with friends and colleagues all over social network.

The use of these assets by employees must be exclusively for the performance of its activities.

**Conduct to be maintained on the premises and appurtenances work**

All staff and employees are required to:

• To provide true and correct information on their professional experience.  
• Conduct business with utmost professionalism and seriousness.

• Always work in order to stimulate learning and knowledge.

• Be available to the continuous updating and improvement of their professional skills, and keeping it literally grow.

• Do not carry out any discrimination of any kind with respect to clients, suppliers and colleagues, nor to situations of ambiguity with them.

• Maintain a suitable moral conduct with ethical and social principles Euro Stampaggi SpA

• Use tools and equipments (also PC) just for relevant activities to their job. It’s absolutely forbidden install programs on PC. Any malpractice related to installing or using data transfers software, will be conducted to the Pc user and to him will be charged legal responsibility.

## The commitment of the Customers

All customers must commit to:

• Be polite and fair to all employees.

• Preserving the quality of the products received.

• Communicate to Euro Stampaggi S.p.A. wrongdoing by contributors or staff.

## The commitment of Suppliers and Sub-Contractors

All Suppliers Subcontractors must commit to:

• Implement commitments taken in respect of Euro Stampaggi SpA in terms of punctuality, safety standards, product quality and services.

• Establish supplier relationships with companies that also ensure compliance with the requirements of the SA8000 (need not be certified), compliance with applicable environmental regulations and compliance with laws and regulations applicable to the field of technical products and services provided, by virtue of the fact that Euro Stampaggi SpA has an Integrated Management System (ISO 9001, ISO 14001 and SA 8000).

• Ensure confidentiality and non-disclosure of know-how and goods manufactured by Euro Stampaggi S.p.A. for clients.

Suppliers and Sub-Contractors must undertake to:

* Be in compliance with production, environmental, security and trading standards as well as respecting employees’rights.
* Subscribe Commitment Letter
* Share values and principles of Euro Stampaggi and engage in respecting behavior rules.
* Complete informative questionnary, if required.
* Give availability to be subject of audits from Euro Stampaggi S.p.A.

# Applicability of the Code of Ethics

## Meeting standards

Euro Stampaggi S.p.A. is required to ensure compliance with the principles, values and commitments spelled out in this Code.

All employees and contractors, all of the Suppliers and Sub-Contractors, and all customers are required to comply with the rules of conduct set out in this Code of Ethics.

Euro Stampaggi S.p.A will penalize staff who are inconsistent and respectful of the values and principles that constitute the Code of Ethics, according to the seriousness of the offense and behavior assumptions. As with all disciplinary matters, will be guided by the principles of justice and fairness, and respect for the rules, including the national collective bargaining agreement.  
Euro Stampaggi S.p.A. also takes action against the Suppliers and Sub-Contractors who do not abide by the rules will be the Code of Ethics, in the manner prescribed by the procedures of the Integrated Management System Management.

## Referrals for the interpretation and application of the Code of Ethics

For the full observance and interpretation of the Code of Ethics, staff can contact the Manager of the System of Social Accountability Management or workers' representative for Social Responsibility. For issues concerning the environment the referent is the Head of the Environmental Management System. For the quality of the Contact Person is the Head of the Quality System.

The Head of the Management System of Social Responsibility, the Head of the Environmental Management System and the Head of the Quality System, each for its own part, is entrusted with the following tasks:

• Spread with a tougher edge and running the Code of Ethics to employees, Customers, Suppliers and in general with all third parties involved.

• Manage, implement, investigate and verify the regulations in the Code of Ethics in order to adapt to changing laws.

• Support operationally in the interpretation, implementation and evaluation of the Code of Ethics, which means constant reference of the correct action to be taken during the course of their business.

• Verify, monitor and evaluate the cases of violation of the written rules, providing in case of infringements to the adoption of the necessary measures, in cooperation with the Board, in accordance with laws, regulations, and the Negotiable applied.

• Promote and establish communication programs and employee training, aimed at improving the understanding of the objectives and procedures of behavior to achieve them.  
At the Workers' Representative for Social Responsibility is assigned the following tasks:  
• Protect and assist employees who report conduct that does not comply with the Code of Ethics, protecting them from pressure, interference, intimidation and retaliation.  
• Collaborate in the dissemination of the Code of Ethics to all employees and interested parties.

## Reporting violations

Everyone is obliged to draw the attention of the Head of the Management System of Social Responsibility or workers' representative for Social Responsibility, or anonymously through the appropriate complaint mechanism / report on allegations of infringement of the rules behavior of the Code of Ethics. Euro Stampaggi S.p.A. agrees not to take no action against anyone who has reported a violation.

Scandicci, 14/01/2019

Euro Stampaggi S.p.A.

Sole Director

(Giuliano Simonelli)