

# Ethical and Conduct Code

## FOREWORDS

RT Valvole Industriali deemed it appropriate to adopt this "Ethical and Conduct Code" (hereinafter "Code"): a document which officially and organically brings together the set of principles of conduct of the company towards the main stakeholders, in compliance with current legislation, orienting the various subjects on the lines of conduct to follow and those to avoid, identifying responsibilities and any consequences in terms of sanctions. The organizational model and internal procedures adopted by the Company to carry out its activities comply fully with the rules contained in this Code.

## SCOPE OF APPLICATION AND RECIPIENTS

The principles indicated and the provisions of this Code are binding for the General Management and for the people linked by employment relationships with RT Valvole Industriali Srl and for all those who work with the Company, whatever the relationship that binds them to the same, hereinafter all also defined with the term "Recipients".

## GENERAL PRINCIPLES

### ***Compliance with laws and regulations***

RT Valvole Industriali srl view the compliance with current laws and regulations as an essential principle. Every employee of the Company is required to comply with the aforementioned regulations.

Furthermore, this compliance commitment must also apply to consultants, suppliers, customers and anyone who has relationships with the company, as better indicated in the previous chapter.

RT Valvole Industriali srl, therefore, will not establish or continue any relationship with anyone who does not intend to align with these principles.

RT Valvole Industriali srl must ensure an adequate training and continuous awareness program on issues relating to the Code.

RT Valvole Industriali srl rejects any behaviour, even if carried out in its favour, which is contrary to the law, current regulations or the lines indicated in the Code.

Behaviours aimed at conflicting or circumventing current regulations and internal regulations are not permitted, even if requested by the customers themselves.

Requests from customers that are contrary to professional dignity and the provisions of this Code cannot be accepted.

## ***Correctness and honesty***

RT Valvole Industriali srl operates in compliance with professional ethics and internal regulations. The pursuit of the company's interest can never justify conduct contrary to the principles of correctness and honesty; also for this reason, any form of benefit or gift, received or offered, which could be understood as an instrument aimed at influencing the independence of judgment and conduct of the parties involved, is rejected.

Gifts of modest value and other ordinary entertainment expenses are permitted as long as they are of modest value.

In case of doubt regarding the correspondence of the gift in relation to the above, before accepting it, the employee must inform the management of the incident, which expresses its binding opinion on the matter.

## ***Impartiality***

In relations with all counterparties, the company avoids any discrimination based on the age, racial and ethnic origin, nationality, political opinions, religious beliefs, sex, sexuality or state of health of its interlocutors.

## ***Professionalism and enhancement of human resources***

RT Valvole Industriali srl guarantees an adequate level of professionalism in carrying out the tasks assigned to its collaborators.

## ***Conflicts of interest***

Carrying out each activity, RT Valvole Industriali srl pays attention to operating in the absence of any conflict of interest.

In addition to the hypotheses established by law, the critical nature of the conflict of interest can arise in any case in which a Person operates to satisfy an interest other than that of the company and its property, but for the sole purpose of obtaining a personal advantage or that of third parties.

Anyone who becomes aware of the existence of a conflict of interest, as represented above, must promptly notify the Company.

## ***Transparency and completeness of information***

The information transmitted by RT Valvole Industriali srl is truthful, complete, transparent and understandable to allow recipients to make informed decisions regarding the relationships to be maintained with the company.

## ***Diligence and good faith***

Each employee and/or collaborator must act loyally and in good faith, respecting the signed contractual obligations and ensuring the required services. He must also know and observe the contents of this Code, basing his conduct on respect, cooperation and mutual collaboration.

## ***Activities documentation***

All activities, actions, transactions and operations of the Company must be:

1. carried out in compliance with current regulations, maximum management correctness, completeness and transparency of information and both formal and substantial legitimacy;
2. carried out in compliance with the instructions and procedures and within the limits of the delegations received and the budgets approved by the Management, as well as being legitimate, coherent and appropriate.

## **PROTECTION OF HEALTH, SAFETY AND ENVIRONMENT**

### ***Health & Safety***

The Recipients of this Code contribute to the process of risk prevention and protection of health and safety in the workplace, without prejudice to individual responsibilities pursuant to the applicable legal provisions on the matter.

They must also maintain a climate of mutual respect for the dignity, honor and reputation of each person while also respecting the organization existing within the company.

RT Valvole Industriali srl is committed to constantly improving safety and health conditions at work through technological improvements and training of staff.

The health conditions of workers in relation to their duties are constantly monitored through health surveillance.

The participation of workers and their representatives in company decisions that affect aspects relating to safety and health in the workplace is guaranteed.

## **Environment**

RT Valvole Industriali srl, in relation to its activity, promotes a company policy that is attentive to socio-environmental issues and to territory. In accordance with its attention to environmental issues, RT Valvole Industriali srl implements the following actions:

1. technological updating of the plants aimed at guaranteeing, where possible, the reduction of pollution factors
2. management of purchases and disposal aimed, where possible, at the recovery/reuse of raw materials, in compliance with cost-effectiveness standards.

## **Use and retention of company information**

Each Recipient, with reference to any information learned due to their function, is obliged to ensure maximum confidentiality, also in order to safeguard the technical, financial, legal, administrative, managerial and commercial know-how of RT Valvole Industriali srl. In detail each subject is required:

1. to acquire and process only the information and data necessary for the purposes of the function to which they belong and in direct connection with the latter;
2. to acquire and process the information and data themselves exclusively within the limits established by the procedures adopted in the matter;
3. to keep the data and information in order to prevent them from coming to the attention of unauthorized parties;
4. to communicate the data and information in accordance with established internal procedures or upon express authorization from hierarchical superiors and, in any case, in case of doubt or uncertainty, after having ascertained (by contacting superiors or objectively finding in the Company's practice) the disclosure in the specific case of data or information;
5. to ensure that there are no absolute or relative constraints on the disclosure of data and information regarding third parties connected to the Company by relationships of any nature and, if necessary, request their consent.

RT Valvole Industriali srl undertakes to protect the confidentiality of all information of any nature or object that it comes into possession of in carrying out its business, avoiding any improper use or undue dissemination of such information.

## **Protection of workers**

RT Valvole Industriali srl provides for the protection of workers through compliance with the safety regulations, the respect the fundamental rights of workers of the person and of safety rules at work.

Child labor is not permitted unless there are collaboration agreements with schools and training institutes for school-work alternation. Forced labor is prohibited in any form. Workers'

remuneration is guaranteed according to the rules of the CCNL as well as their rights in terms of working hours, holidays and social guarantees.

Workers have the right to associate according to the rules established by current national law. Any form of discrimination against workers is prohibited and their freedom of thought is guaranteed.

### ***Use of computer data***

All information residing in the company's IT and telematics systems, including e-mail, must be used exclusively for carrying out company activities, in the way and within the limits indicated in the internal procedures of RT Valvole Industriali srl

RT Valvole Industriali srl also undertakes to protect, in full compliance with the provisions of Legislative Decree no. 196/2003 - "Code for the protection of personal data" (also known as "Privacy Code"), all personal data acquired, stored and processed within the scope of his activity.

### ***Administration and budget***

Recipients involved in administrative and accounting activities must scrupulously respect internal procedures, legal regulations and accounting principles. In particular, the accounting findings and documents are based on precise, exhaustive and verifiable information and reflect the nature of the operation to which they refer; they are carefully archived for possible auditability.

### ***Illegal conduct***

RT Valvole Industriali srl establishes that the Recipients must refrain from providing or promising to third parties, sums of money or other benefits in any form or manner, even indirectly, to promote or favour the interests of the Company, even if subjected to illicit pressure. They cannot accept for themselves or for others such sums and/or benefits to promote or favour the interests of third parties in relations with RT Valvole Industriali srl. Gifts of significant value are not permitted; if they are modest value gifts, they must be attributable solely to acts of mutual courtesy within the context of correct commercial relations.

Furthermore, they are prohibited from reporting untrue facts or omitting information or hiding data in direct or indirect violation of regulatory principles and internal procedural rules, so as to mislead third party recipients of the aforementioned information.

## **RELATIONSHIPS WITH THE RECIPIENTS OF THE CODE**

### ***Relations with the property***

RT Valvole Industriali srl in its relations with the owners undertakes to safeguard the company assets, using sound and prudent management criteria.

### ***Relationships with employees***

Employees must comply with the principles of protection and respect for the human person, loyalty, dignity, morality, correctness in personal relationships, sense of responsibility and respect for hierarchical and functional relationships.

### ***Relationships with customers***

RT Valvole Industriali srl establishes that the Recipients must adopt behaviours aimed at satisfying the right needs of the Customer, with the aim of consolidating the relationship in compliance with current legislation.

### ***Relationships with suppliers***

RT Valvole Industriali srl selects suppliers with particular attention in compliance with the principles of transparency, impartiality and correctness, verifying the actual technical and professional competence and the adequate means/tools to carry out the commissioned activity.

RT Valvole Industriali srl guarantees suppliers diligence in payments according to stipulated agreements and correctness in commercial relationships.

RT Valvole Industriali srl requires that suppliers also undertake to respect the human rights of workers and to comply with the labour regulations in force in the state.

### ***Relations with the public administration***

RT Valvole Industriali srl's relationships with the Public Administration are based on compliance with laws and regulations and on compliance with the public nature of the function. RT Valvole Industriali srl establishes that Recipients are prohibited from promising or disbursing sums to public officials and employees of the Public Administration in any form directly or indirectly to induce or facilitate the performance of official acts or make them contrary to the official duties of the Public Administration, or to put in place or promote the interest / advantage of RT Valvole Industriali srl.

## SANCTIONS

The provisions of this Code are an integral part of the contractual obligations assumed by the Recipients or by subjects having business relationships with RT Valvole Industriali srl. Violation of the provisions of the Code may constitute a breach of contractual obligations, with all legal consequences, including with regard to the termination of the contract or assignment and possible compensation for damages.

## DISCLOSURE OF THE CODE

RT Valvole Industriali srl informs all Recipients of the provisions and application of the Code, recommending compliance with it.

In particular, the Company, through the corporate functions responsible for this, provide

1. the transmission of the Code to the Recipients, through the distribution of copies of the same;
2. the transmission of the Code to the Recipients, through the distribution of copies of the same;
3. the interpretation and clarification of the provisions contained in the Code
4. verifying effective compliance with the Code
5. any future updates and implementation of the provisions of the Code based on the needs that arise from time to time.

Any future updates, due to regulatory adjustments or the evolution of civil sensitivity, will be approved by the Company Management and promptly disseminated to all Recipients

Data, 09/01/2023

Ing. Giovanni Baga  
Amministratore Unico

