



## CODE OF CONDUCT

Rev 01  
del 30/09/2020



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## **BICMA srl**

**on the market since 1994**

**with the aim of manufacturing safety signs for commercial & industrial vehicles.  
As well as designing & manufacturing accessories for commercial & industrial vehicles**

It takes particular care of respect for values & requirements of the market in which it operates & of all stakeholders; for this reason, in addition to compliance with current laws & voluntary regulations, it has also decided to adopt an ethical-behavioral tool, called " CODE OF CONDUCT"

This document defines the reference values, as well as business commitments; governs the relevant conduct of those who work at the service of the company; specifies rules, behaviors which are recognized as having a positive ethical value.

The Code of Conduct represents the company's commitment to pursue the highest levels of ethics in the fulfillment of corporate purposes by identifying operational standards & rules of conduct.

This code does not replace & does not overlap the laws & other external & internal regulatory sources as an additional document, which strengthens the principles contained in these sources, with specific reference to the ethical profile of corporate conduct.



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# CHAPTER 1: INTRODUCTION

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## 1.1 PURPOSE

The purpose of this code is to ensure that the activities & behaviors of the subjects to which it applies are put in place in compliance with principles such as confidentiality, impartiality, independence, honesty & transparency as well as all those principles related to the ethics of functional services

## 1.2 FIELD OF APPLICATION

The code applies to:

- shareholders
- employees
- any other person with an interest in the company

all interested parties must:

- maintain full confidentiality regarding the Company's documents & be authorized in advance for the dissemination of news & / or documents
- refrain from carrying out competing activities
- be aware of the contents of this code, especially with reference to the function performed
- immediately report the occurrence of situations of violation, even alleged, of this Code



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# CHAPTER 2: WORK CHARTER

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## 2.1 HUMAN RESOURCES

BICMA believes that the sense of belonging, the full sharing of its policy & Code of Ethics as well as the professionalism of all employees are decisive values & conditions for achieving its MISSION, & expects that employees, at every company level, collaborate in maintaining a climate of mutual respect for dignity, honor & reputation of each one in the company.

## 2.2 STAFF SELECTION

Personnel selection is carried out on the basis of the correspondence of the candidates' profiles to the company needs, in compliance with equal opportunities for all stakeholders.

## 2.3 ESTABLISHMENT OF THE EMPLOYMENT RELATIONSHIP

The staff is hired with an employment contract in the manner provided for by the legislation in the collective bargaining in force. No irregular or "undeclared work" positions are allowed



Upon the establishment of the work relationship, the company provides the staff with all the necessary information: characteristics of the function & tasks to be performed, national collective agreement, rules relating to safety at work and the Code of Conduct

## 2.4 DISCRIMINATION & HARASSMENT IN THE WORKPLACE

The company does not implement any form of discrimination, direct or indirect, in the employment relationship

Discrimination related to age, sex, sexuality, race, state of health, nationality, opinions, politics & religious beliefs is prohibited

The company is committed to ensuring in internal & external work relationships that no type of personal harassment is given rise to & it counteracts any oppressive or harmful attitude towards the person, his beliefs & preferences.

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## **2.5 ABUSE OF ALCOHOLIC BEVERAGES & DRUGS**

Each employee is prohibited from:

- working under the effects of alcohol, drugs or substances of similar effect
- consuming or transferring drugs for any reason during the course of work

## **2.6 PROTECTION OF COMPANY ASSETS**

Each employee must feel responsible for the company assets (tangible & intangible).

No one can make improper use of the company's assets & resources or allow others to do so.

## **2.7 CONFLICT OF INTEREST**

A conflict of interest is considered to exist whenever employees & collaborators pursue an objective other than that pursued by the company, or procure or attempt to obtain, voluntarily, a personal advantage when carrying out activities carried out in the interest of the company . Any form of conflict of interest is prohibited, in case of violation the Company will take steps to put in place the appropriate measures to end the situation.

## **2.8 WHISTLEBLOWER POLICY**

The company undertakes to protect the confidentiality of those employees who report suspected illegal or irregular behavior in the workplace. The company also undertakes to prevent these workers from being subjected to retaliation or discrimination



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# CHAPTER 3: ENVIRONMENTAL & HEALTH & SAFETY CHARTER

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## 3.1 ENVIRONMENT

As part of its activities, the company undertakes to contribute to the development & well-being of the communities in which it operates, pursuing the objective of guaranteeing the safety & health of employees, external collaborators, citizens - users & customers - & the communities affected by the activities themselves & to reduce the environmental impact.

The company is committed to raising awareness at the various levels of staff, pursuing the growth of awareness & sense of responsibility of the entire organization for the protection of the environment. The sense of responsibility, the behavior & the attitudes assumed in relation to the aspects relating to the correct management of environmental problems are an integral part of each employee's job.

As regards the Environmental Management, the company is concretely committed to reducing the exploitation of natural resources, through the use of energy from renewable source. It is committed to the correct management of waste, preferring when possible recovery rather than disposal, & to the correct management of atmospheric emissions as well as preventing spills that could cause soil pollution.

In addition to this, it is the company's need & will to always keep up to date all the authorizations required by the competent authority related to the Environment sector.

## 3.2 HEALTH & SAFETY IN THE WORKPLACE

As part of its activities, the company is committed to ensuring the safety and health of its employees.

The company's activities are, in fact, managed in full compliance with current legislation on prevention and protection and so must be for all those who work for it. Operational management refers to safeguard criteria, pursuing the improvement of health and safety conditions at work through preventive rather than corrective actions; the company makes the necessary PPE (Personal Protective Equipment) available to employees for the performance of the work carried



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out, and undertakes to properly train and train all staff in order to pursue the growth of awareness and sense of responsibility of the whole organization.



The company is also committed to the correct management of emergencies, in this context the emergency management measures are checked every six months and, on an annual basis, the evacuation test of all personnel is carried out with verification of the adequacy of the Emergency.

All recipients of this Code of Conduct must participate in the process of risk prevention and protection of health and safety towards themselves, colleagues and third parties exactly as required by the regulations and in particular by Italian Legislative Decree 81/2008.

In order to prevent and avoid the commission of crimes relating to the protection of the health and safety of workers, as required by art. 25 septies of Italian Legislative Decree 231/2001, the company implements a system that in particular ensures:

- The organization of corporate human resources in terms of individual skills, decision-making autonomy and related responsibilities
- The resources needed to design and implement technical, organizational and managerial interventions aimed at achieving the goal of continuous improvement of the safety level
- Information and training activities (when necessary) at employees to promote their responsibility and awareness on health and safety
- The information activity of suppliers and external collaborators in general so that they adopt appropriate health and safety behaviors with company policy
- The prevention and minimization of risks to the health and safety of employees
- The development and continuous optimization of production processes, which is achieved through the safety of installations and work environments
- The preparation or implementation of tools and procedures for the management of internal and external emergencies in order to minimize the consequences
- The introduction and application of surveillance and verification procedures and methods in order to control the implementation of the company policy



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### **3.3 MANAGEMENT OF HAZARDOUS SUBSTANCES AND ASSOCIATED REGULATIONS**

4.3.1 Responsible Chemical Management: company has identified and manages chemical products to ensure their handling, their movement, storage, use, recycling or reuse and disposal. The updating of the risk assessment report is performed at the deadlines defined, the assessment of the Chemical Risk to always ensure very low levels of exposure.

The implementation of the REACH Regulation within the supply chain is also verified as well as the absence of SVHC-type substances based on the updates published on the ECHA website.

4.3.2 Responsible Sourcing of Materials: despite the law will come into force throughout the EU 01/01/2021, the company implements an ethical management of Due Diligence of the "Conflict Mineral" \*, having carried out an internal verification of the entire supply chain of the absence of these minerals in the articles making up the products sold.



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# CHAPTER 4 CHARTER OF ETHICS RELATIONS WITH THIRD PARTIES

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## 4.1 GENERAL

BICMA, in relations with third parties, is inspired by the principles of loyalty, correctness, transparency and efficiency

All interested parties whose actions may in some way be related to the company, must follow correct conduct in conducting business regardless of the competitiveness of the market and the importance of the deal.

Practices of corruption, fraud, illegitimate favors, collusive behavior, direct and / or third party solicitations are prohibited.



## 4.2 RELATIONS WITH CUSTOMERS

The company's style of behavior towards customers is based on to availability, respect and courtesy, with a view to a collaborative and highly professional relationship. The resources of the group are oriented towards the research and satisfaction of the needs of direct and indirect customers. Considering the companies that buy directly as direct customers, and the customers of our customers up to the end user as indirect customers. The company works with the utmost diligence to prevent any counterfeit parts or materials in the products sold.

## 4.3 RELATIONS WITH SUPPLIERS

In relations of procurement and supply of goods and / or services, it is mandatory to:

- observe the internal procedures for the selection and management of suppliers relations
- not to preclude any company in possession of the required requisites the possibility of competing to win the supply, adopting objective evaluation criteria for the selection.
- Maintain an open dialogue in line with good business practices
- Promote compliance with environmental quality criteria and ensure compliance with the ethical principles of the law, including those of social relevance
- The company expects its suppliers to work with diligence to prevent any counterfeit parts or materials in the products sold

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In choosing its suppliers, the company operates with the aim of achieving the maximum competitive advantage in respect of quality and adopts non-discriminatory behavior. In the choice it takes into account not only the economic convenience but also the technical capacity, evaluating overall reliability.

#### **4.4 RELATIONS WITH THE PUBLIC ADMINISTRATION**

Relations with the Public Administration are reserved exclusively for the company owner or persons designated by him.

Relations with the public administration must be managed in full and rigorous compliance with the laws and regulations in force, with the principles set out in the Code of Ethics, in order not to compromise the integrity and reputation of both parties.

It is forbidden to mislead anyone with tricks or deceptions, to procure an unfair profit for the company with damage to others. It is also forbidden to alter in any way the operation of a computer or telematic system or to illegally intervene in any way on the data, information and programs contained therein or relevant to it to achieve an unfair profit with damage to others.

It is also forbidden to use the internet tool for downloading any type of file except for clearly business purposes or if expressly authorized by the company owner, as well as browsing sites with inappropriate content.

#### **4.5 RELATIONS WITH TRADE UNION ORGANIZATIONS**

The company regulates industrial relations with protocols and negotiates with transparency and good faith with the trade unions, where required by the National Bargaining and by the National or corporate protocols.

#### **4.6 SPONSORSHIP AND CONTRIBUTIONS**

Sponsorship activities, which may concern sports, social fields, etc., are intended only for events or organizations that offer a guarantee of seriousness.

The only company owner who authorizes sponsorships can be

#### **4.7 RELATIONS WITH MASS MEDIA and SOCIAL MEDIA**

Anyone within the company is prohibited from providing information to representatives of the mass media or posting news on social media (video images, etc.) without the authorization of the company owner



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# PROCESSING OF PERSONAL DATA AND CONFIDENTIALITY

## 4.8 PERSONAL DATA AND CONFIDENTIALITY

The company's activities require the acquisition, storage, processing, communication and dissemination of news, documents and other data relating to negotiations, administrative procedures, financial transactions, contracts, deeds, reports, study notes, drawings, photographs, software, etc.

Furthermore, company databases may contain:

- personal data protected by the privacy protection legislation
- data that, due to negotiated agreements, cannot be known externally
- data whose inappropriate or untimely disclosure could damage the corporate interests

It is the obligation of every employee, collaborator, supplier, etc. ensure the confidentiality required by the circumstances for each piece of information learned in relation to their functions.

The company undertakes, in compliance with EU regulation 2016/679 regarding the protection of personal data, to protect information relating to its employees and third parties generated or acquired within and in business relationships, and to avoid any use of this information.

The information, knowledge and data acquired or processed during one's work or through one's duties belong to the company and cannot be communicated or disclosed without specific authorization from the Management.

The data controller of personal data is: BICMA srl.

The disclosure of information relating to the organization, production methods is prohibited, each employee / collaborator must:

- acquire and process only the data necessary and appropriate for the performance of their functions
- store them safely
- communicate data only within the scope of their duties and in the case of "sensitive" data with the authorization of the Management (after making sure that the data is disclosed in the specific case)

# ECONOMIC MANAGEMENT AND CORPORATE OFFENSES

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## **4.9 ACCOUNTING CORRECTNESS**

The correctness of accounting is the basic principle to avoid any harmful event that may involve the company.

Everyone within the company is required to collaborate so that the management facts are correctly and promptly represented in the accounts.

For each operation, adequate supporting documentation of the activity carried out is kept on file in order to allow:

- Easy accounting registration
- The identification of the different levels of responsibility
- Accurate reconstruction of the transaction, also to reduce the likelihood of interpretative errors

Each record must reflect exactly what is shown in the supporting documentation.



It is the task of the functions concerned to ensure that the documentation is easily traceable and ordered according to logical criteria

## **4.10 OPERATING PROCEDURES AND PRACTICES**

The company has adopted operational procedures and / or practices for the various managements, these must be adopted by all those who intervene in any capacity in the operational processes and in the manner provided for the competent functions, each, respective competences and functions is required to strictly observe these procedures and / or operating practices.

In particular, these operating procedures / practices must regulate the performance of each operation and transaction. From these it must be possible to detect the legitimacy, both formal and substantial, of the operation, the authorization, consistency, congruity, correct registration and verifiability, also in terms of financial resources. Each operation must therefore be supported by adequate, clear, complete documentation to be kept in the records, so as to allow at any time control over the reasons, the characteristics of the operations and the precise identification of who, in the various phases, authorized, carried out, registered and verified.

Compliance with the indications provided for by company procedures and / or practices regarding the flow of activities to be observed on training, decision making, recording of company activities and their effects allows the culture of control to be spread and stimulated at all company levels,

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which contributes to the improvement of management efficiency and constitutes a support tool for managerial action.

#### **4.11 CORPORATE CRIMES**

The procedures to prevent the commission of corporate crimes, as required by art. 25 ter of Legislative Decree 231/01, must, in particular, refer to compliance with the following behavioral principles:

- The directors, managers responsible for preparing the corporate accounting documents, as well as employees and collaborators who in any capacity are involved in the preparation of the financial statements and similar documents or documents that represent the economic, equity or financial situation of the company, are forbidden to expose material facts that do not correspond to the truth, even if subject to assessment, or omit information or conceal data in direct or indirect violation of the regulatory principles and internal procedural rules, in order to mislead the recipients of the aforementioned documents . Any unlawful conduct will be considered as committed to the detriment of the company
- It is forbidden to prevent or in any case hinder the performance of control or auditing activities legally attributable to the shareholders, the board of statutory auditors, the auditing company
- It is forbidden to disseminate false information or to carry out simulated transactions or other artifices such as to cause a significant alteration to the price of financial instruments, listed or unlisted, or to significantly affect the trust that the public places in the capital stability of the company or any other company.
- All those who have relations with the public supervisory authorities, as well as administrators, auditors and anyone in top positions are prohibited from obstructing their functions; it is also forbidden, in communications to the aforementioned authorities, to expose material facts that do not correspond to the truth, even if subject to evaluation, on the economic, patrimonial or financial situation of the company, or to conceal by other fraudulent means, in whole or in part facts concerning the situation itself, which should have been communicated;
- All operations and actions that involve violation of the rules set by law to protect the integrity and effectiveness of the share capital are prohibited, in order not to damage the guarantees of creditors and third parties