



FRIGERIO ETTORE S.p.A.

Code of Ethics

Rev.02

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DATE	SIGNATURE
02/11/2023	

REVISION MATRIX		
Rev.	DATE	OBJECT
00	10/10/2017	FIRST ISSUE
01	10/07/2020	GENERAL REVIEW OF CONTENT
02	02/11/2023	UPDATE FOR TRANSPOSITION D. lgs. 24/2023 ON WHISTLEBLOWING (PARAGRAPH 6)

1	INTRODUCTION
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Frigerio Ettore s.p.a. is aware of its responsibilities of integrity and rectitude towards its employees, control bodies, all stakeholders and the environment.

This Code of Ethics defines the ethical principles of the organization and the guidelines of conduct that must be implemented by the company, all employees and collaborators, in order to operate in their respect.

It is the tool to ensure the prevention and detection of violations of these principles and laws, without fear of retaliation.

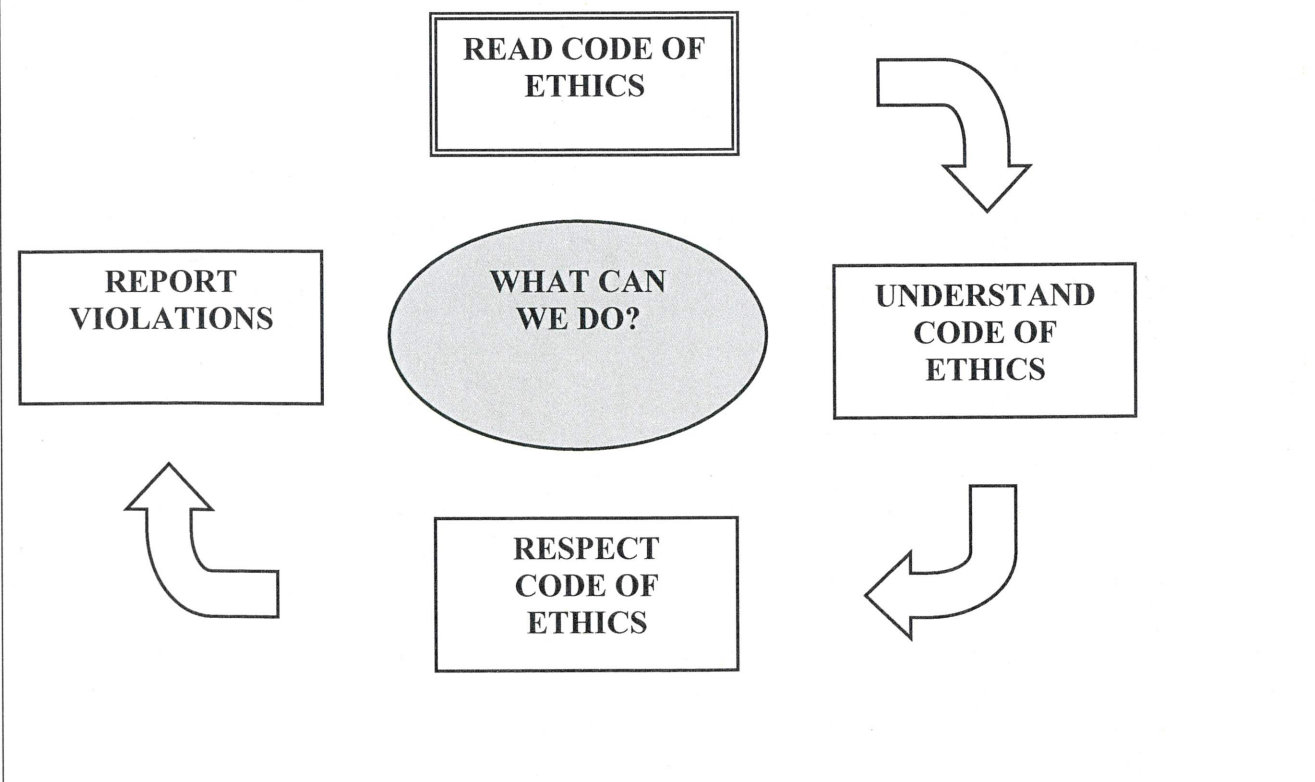
Respecting the code of ethics means:

uphold the values of the company

allow its development

contribute to the creation and maintenance of a human-scale working environment.

Frigerio Ettore Spa encourages the contributions of employees and collaborators for the improvement of the Code of Ethics and working conditions.





2	ETHICAL PRINCIPALS
Professional commitment	Constant application of the competence, knowledge and experience acquired by each, for the achievement of business objectives
Mutual respect	Relationship with colleagues serene, courteous, open, honest and loyal. Avoid deception or manipulation and conduct which is uncivilized or damaging to the dignity of others
Team spirit	Active participation and cooperation, communication, listening, sharing of skills and opinions, flexibility, commitment to solving problems, involvement in the common goal. Avoid individualism
Protection of privacy	Protection of data provided by employees, collaborators, customers, suppliers, candidates and anyone else, in compliance with current legislation
Compliance with the law	Constant observation of the laws and regulations in force in Italy and in the countries in which it is exported (where applicable) Information and training of the employees and collaborators involved, on the laws that affect their activities.
Respect for health and Complete compliance with internal health and safety regulations and procedures.	Complete compliance with internal health and safety regulations and procedures. Information and training of employees and collaborators on emergency management procedures. Immediate reporting by employees and collaborators of unsafe working conditions
Commitment against substance abuse (alcohol and drugs)	Maintenance of a working environment with a ban on the sale and consumption of substances which may cause psychophysical alteration (alcohol and drugs)
Zero tolerance towards harassment and violence in the workplace	Verbal or physical behavior by employees, collaborators, suppliers or customers causing harassment, intimidation, insult, hostility, offense, discrimination, violence, of any nature (including sexual) to others
Safeguarding information, data and assets	Protection of information, data and assets of Frigerio Ettore s.p.a., Customers and Suppliers. Prohibition of use for personal or other purposes not related to the organization
Respect and protection of internal and external intellectual property	Protection of intellectual property of Frigerio Ettore s.p.a., Customers and Suppliers. Prohibition of use for personal or other purposes not related to the organization
Use of computer applications and social media	Use of computer applications in a legal manner and in compliance with the licenses of use. Prohibition of navigation on websites with contents indecorous, offensive and in any case not related to their work. Use of social networks for corporate purposes only and with permission
Respect for the community	Commitment to carry out and develop work and related activities while respecting the external context and well-being of the local community. Respect for the uses and the pull of the community.
Fairness in relations with suppliers	Objective selection in relation to technical characteristics, qualitative, logistic, economic competitiveness and



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	reliability.
Fairness in relations with customers	Satisfaction of customer expectations in terms of product and service required.
Responsible environmental management	Respect and protection of the environment in the management and development of the organization, in accordance with current legislation.

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ANTI-CORRUPTION POLICY

It is forbidden for the employees and collaborators of Frigerio Ettore Spa to offer money or gifts to executives, officials or employees:

of Public Administration, Italian and foreign
of customers

- in order to:modificarne o influenzarne il comportamento o il giudizio
- to provide an advantage.

It is also forbidden for employees and collaborators of Frigerio Ettore Spa to receive money or gifts (if not of symbolic value) from suppliers or external collaborators, in order to favor them.

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CODE OF CONDUCT FOR EMPLOYEES AND COLLABORATORS

All employees and collaborators of Frigerio Ettore Spa are required to comply with this Code of Ethics and to maintain in every situation a conduct marked by respect for the ethical principles contained therein and the laws.

Violations of the Code of Ethics are therefore treated with appropriate sanctions.

It is mandatory to:

know the provisions of the Code of Ethics

request clarification of the Code of Ethics from the responsible person, if there are doubts of any nature

carry out their work in compliance with the contents of the Code of Ethics

promptly report any violations of the Code of Ethics and laws

actively cooperate in any investigations for violations of the Code of Ethics and laws.

It is forbidden to:

knowingly or negligently violate the Code of Ethics of Frigerio Ettore s.p.a.

knowingly or negligently violate applicable laws and regulations, in particular, but not exclusively, those relating to occupational safety and health, the environment, social communications

discriminate in words or behavior colleagues and collaborators, through harassing, harassing or damaging attitudes of human dignity

disclose, unless expressly authorized by the Management, any information relating to Frigerio Ettore s.p.a.

disclose, unless expressly authorized by the Management, information relating to the Customer's property in terms of personal data (name, site, contacts), intellectual property (designs, rules, patents, etc.), materials, components, equipment, tools

pursue personal interests at the expense of corporate ones

adopt attitudes that may damage the image of the organization

- use business assets for purposes other than those inherent in your assignment.



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DISCLOSURE

This Code of Ethics is disclosed through:
 delivery to all the staff
 delivery to new recruits (also interim)
 the display on the bulletin board located in the stamping atrium
 the integration of training activities
 the publication on the website

The disclosure of the Code of Ethics and its revisions must take place in a timely manner, to all recipients. Information support, in case of doubts about the interpretation of the Code of Ethics, is provided by the Human Resources Manager.

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WHISTLE-BLOWING

Objective

- The ethical policy of escalation defines the ways to:
- make a report of violations
- ensure the confidentiality of the report
- assess the alert
- manage the alert
- define any sanctions

recipients

All employees and collaborators of Frigerio Ettore s.p.a.

notifications
(whistleblowing)

The employees and collaborators that within the company detect:

- possible violations of the Code of Ethics, laws and regulations, internal procedures and instructions;
- fraud, danger or other serious risk

that may damage the company, customers, colleagues or even the reputation of the company, are required to make timely reporting, through the dedicated webportal <https://whistleblowing.frigerioettore.com/> accessible from any browser or mobile device. The document "FEL USE GUIDE Whistleblowing portal 2-11-23", made available to recipients in different ways, contains instructions for the use of this portal by the signaller. Any communication between the person who reports and the person who manages the report (the person in charge) takes place through the portal until the resolution of the report itself.

The damage resulting from the violation can be of various nature, for example economic, environmental, security, image.

The report must be nominative and properly documented in relation to the breach detected or alleged (description of the facts, date and time, name of the persons involved and those aware of the facts), to allow the subsequent assessment phase.

privacy

Frigerio Ettore s.p.a. guarantees:

- the confidentiality of the alert and the anonymity of the alerter through the use of the portal
- that employees who report such violations in good faith are not subject to any form of retaliation and/or threat, including those who cooperated in its assessment.

Frigerio Ettore s.p.a. may take appropriate disciplinary and/or legal measures against those who, in bad faith, have made false reports, unfounded, slanderous, defamatory.

Evaluation and
management of
the report

The Responsible Person (external subject to the company) is the person in charge of receiving, evaluating and managing the report, through careful and impartial investigation, with the support of competent Managers.

The activity must be independent of the level or position of the persons involved.

The Director shall provide:

- within 7 days from the sending of the alert to the confirmation of taking charge through



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	<p>the portal</p> <ul style="list-style-type: none">- within 3 months from the sending of the alert to give a feedback of the analysis and, if the report is well founded, to give notice of the actions taken in terms of procedures and/or sanctions, always through the use of the dedicated portal. Even if the report is not founded, the communication and interaction with the person who reported is done through the portal. The Director and/or the Management shall take any sanctions against those who have committed a violation of the Code of Ethics, in compliance with the provisions of the law in force and of the contract.
Treating of data personal	Frigerio Ettore s.p.a. guarantees that the personal data of the whistleblowers and any other parties involved, relating to the reports, will be processed in full compliance with the provisions of current legislation on the protection of personal data.