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# Centro Grafico DG

# Code of Ethics

REV.0 - JULY 2020

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## 1. Introduction

This Code of Ethics (hereinafter referred to as the “Code”) contains a series of principles and rules which, in addition to those provided for by current law, govern, in varying ways, the conduct of employees and those entering into contractual relationships with Centro Grafico DG S.p.A. (herein-

after referred to as the “Company”) and is intended to govern conduct pursuant to Italian Legislative Decree n. 231 of 8 June 2001.

The rules of conduct, values and principles specified in the Code sanction the Company's commitment to carry out its activities in accordance with said rules, in the conviction that respect for ethical principles in the conducting of economic

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and social relations is essential for success.

The Company strives to ensure that the principles of this Code are adopted, shared and applied by all the recipients in the pursuit of objectives of profitability and continuous business development.

The Code is made up of:

- ethical values and principles, which the Company intends to share and promote with the recipients;
- rules of conduct, to which all the recipients of the Code must comply;
- rules for the implementation of the Code and for the monitoring of compliance.

The application of the Code is the responsibility of the Chief Executive Officer, who makes use of the company structures and the Security Committee, which is composed as follows:

- Security Manager
- Production Manager
- Commercial Manager
- HR Manager

## 2. Recipients

The recipients of the Code of Ethics (hereinafter referred to as the “Recipients”) are:

- Components of corporate bodies;
- Employees (managers, executives, employees, workers);
- Apprentices;
- Intermediaries, including their employees and freelance collaborators;
- External collaborators (surveyors, doctors, lawyers, contractors and consultants in general);
- Suppliers / Customers.

The Society trusts that the recipients will always assume conduct consistent with the values and principles of the Code in the hope that said values and principles are promoted all professional situations and in civil society in general.

This document is distributed and brought to the attention of components of corporate bodies, of employees and of anyone who has an ongoing relationship with the Company.

The Company shall refrain from establishing or maintaining relationships of any kind with those who explicitly intend not to observe the rules and principles contained in the Code.

Compliance with the rules of the Code is an essential part of the contractual obligations of the Company's directors and employees, also pursuant to and in accordance with article 2104 of the Civil Code and the provisions of Collective Labour Agreements.

## 3. Ethical principles

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### 3.1. General principles

The Company makes reference to the general values of Civility and Democracy set out by the Constitution of the Italian Republic and of the European Union, and in the Universal Declaration of Human Rights, recognising dignity, freedom, equality, solidarity and justice as the pillars of civil coexistence, as also stated in Article 41 of the Italian Constitution, according to which “private economic initiative cannot be carried out in a manner contrary to social utility or in such a way as to damage security, freedom and human dignity”.

The Company adheres to the fundamental principle that a Company's good reputation goes beyond the simple and formal respecting of the Law. This implies, among other aspects, compliance with the behavioural principles of morality, equity, equality, protection of persons, diligence, transparency, honesty, confidentiality, impartiality, protection of the environment and protection of health.

### 3.2. Legislation and “culture of legality”

The Company acts in compliance with all applicable laws and regulations issued by the supervisory and regulatory authorities of the country in which it carries out its business.

For this reason, organisational models and internal control processes are necessary to prevent and counter any illegal behaviour and to promote a “culture of legality” among all the recipients.

The Society makes every effort, within the scope of its responsibility, to prevent and combat corruption, money laundering and all other forms of crime.

All Company employees must be engaged with a regular contract of employment, as the Company does not tolerate any form of unregulated or undeclared work, and applies the same principles to its suppliers.

The recipients, in carrying out their own working and non-working activities, must operate honestly and in compliance with the law, avoiding any illegal behaviour, even in the interests of the Company.

The Company avoids entering into business relationships with third parties that have established or supposed participation in criminal or terrorist activities.

### 3.3. Human resources, professionalism and working conditions.

Human resources are an indispensable factor for the existence, development and success of a company. For this reason, the Company protects

and promotes the value of human resources in order to improve and increase the worth and skills of every worker within the organisational context of the Company.

The Company offers equal opportunities to all employees on the basis of their professional qualifications and individual skills, without any discrimination regarding age, religion, race, political or trade union persuasion or gender.

Therefore the Company, via its relative functions, selects, employs, pays and organises employees on the basis of merit and competence, in compliance with current collective contracts and an award system adopted and based on the criteria of objectivity and reasonableness.

### **3.4. Suppliers**

The choice of suppliers and the setting out of conditions of purchase must be based on an objective evaluation of the quality and price of the goods and services offered, and the ability to provide and guarantee the prompt consignment of goods and services of a level appropriate to the Company's needs. In no case shall a supplier be preferred to any other on the basis of personal relationships, favouritism or advantages other than those in the exclusive interest and benefit of the Company.

The Company relies on suppliers who operate in accordance with applicable law and the rules set out in this Code, with particular regard to the protection of workers' rights.

### **3.5. Safety in the workplace, respect for company assets and services and the environment**

The Company operates at all levels in order to guarantee the physical and moral integrity of its collaborators, working conditions that respect individual dignity, and safe and healthy working environments, in full compliance with applicable law.

The Company also promotes and propagates a "culture of safety and prevention of work-related accidents", developing awareness of risks and promoting responsible behaviour with all collaborators.

The Company undertakes to implement all principles and regulations that safeguard the health of workers in the workplace and consequently the Company, in accordance with Italian Legislative Decree n. 81/08, is committed to ensuring the utmost safety throughout the plant and offices for employees, external collaborators and guests on

company premises.

There is a general ban on the use of alcoholic substances or drugs while carrying out Company activity. There is also a ban on smoking in the workplace, in compliance with the law, and in any circumstances where smoking may constitute a hazard to company structures or property or to the health and safety of colleagues and third parties.

The recipients of this Code must always use the goods and services made available by the Company for working activities in a correct manner, avoiding waste and the inefficient or improper use of the same and in any case ensuring that the assigned property or service is maintained correctly.

To this end, the Company, for these reasons, manages the environmental impact of its activities, paying attention to waste disposal, energy consumption and emissions.

The Company therefore considers safety in the workplace and the protection of the environment to be an essential element, even for its Suppliers.

### **3.6. Safeguarding corporate image and reputation**

The reputation of the Company is an intangible asset of the utmost value that allows it to develop relations with its interlocutors that are based on trust.

The Company trusts that all recipients of this Code are able to represent the Company with professionalism, honesty, seriousness and correctness and will always ensure that its image and reputation is protected.

### **3.7. Privacy and protection of personal data**

The processing by the Company of personal data regarding employees, apprentices, intermediaries, external collaborators and suppliers is carried out according to correctness and in compliance with current Regulations regarding Privacy and with the utmost respect for the rights of the data subject to confidentiality and to the protection of their personal data.

All those who are "data processors or charged with the processing" of personal data must protect and protect said data in an appropriate manner, following Corporate guidelines issued in accordance with Privacy regulations.

The Company guarantees the confidentiality and security of the personal data in its possession through the adoption of measures provided for by sector regulations.

### **3.8. Confidentiality**

All recipients of this Code, being in possession of confidential information concerning both the Company and other subjects due to the nature of their role, profession or duty, must not use said information for purposes not related to the carrying out of their personal activities. The disclosure of information to outside parties must be carried out by competent company functions and in any case in compliance with the law and the principles of transparency and truthfulness. A desirable level of confidentiality regarding any information concerning the Company and its work and professional activities is in any case recommended.

The Company seeks to protect all company information as well as industrial and technical knowledge, including commercial information and trials. All recipients are therefore prohibited from disclosing said information or knowledge to third parties.

### **3.9. Relations with Public Administration**

Relations with public administration and public organisations must be conducted in accordance with fairness and transparency. In particular, all information provided to Public Administration must be truthful, correct, transparent and complete and must be produced and disclosed in accordance with corporate organisational procedures and relative authorisation processes.

### **3.10. Customers**

The Company carries out its business activities with a view to the satisfaction and protection of its customers.

In relationships with customers, the Company ensures correctness and clarity in commercial negotiations and in the assumption of contractual obligations, as well as the correct and diligent fulfilment of contractual obligations.

In conducting business with customers, recipients of the Code are required to apply suitable conditions for each type of customer, establishing standard treatment for customers in similar conditions and in any case in compliance with market practices typical of the sector. The nature of the conditions offered must not be influenced by factors linked to personal relationships between employees or representatives of Company management and customers.

### **3.11. Free competition**

The Company believes in free and fair competition and plans its actions to obtain competitive

results that reward ability, experience and efficiency.

Any action that intends to alter the conditions of fair competition is contrary to the Company's corporate policy and is prohibited to any subjects acting on its behalf. In no event may the pursuit of Company interests justify conduct that is not compliant with applicable laws and with the rules of this Code.

### **3.12. Conflict of interest**

A conflict of interest arises when personal interests or activities concretely or potentially affect the ability to operate in the full interests of the Company.

Recipients of the Code must refrain from carrying out any act, even potentially or indirectly, for interests in conflict with those of the Company, for example personal or family interests of a financial or commercial nature with customers, intermediaries, claimants, suppliers or competitors.

Any conflict of interest that may arise must be handled in complete transparency and in a manner that protects the Company's interests. Every employee, in compliance with the company's rules regarding conflict of interest, must inform their superior if they find themselves in situations in which they have interests, even indirect, that are potentially in contrast with those of the Company.

The Management of the Company, its employees and external collaborators, its intermediaries and collaborators of the same, must refrain from giving and/or receiving gifts in the context of working relationships, with the exception of objects of symbolic value and in compliance with standard commercial practices.

In this light and also in accordance with Italian Legislative Decree n. 231/01, particular attention is placed on relations with employees and officials of Public Administration with whom behaviour routinely accepted in normal commercial practices may be unacceptable or in violation of laws and/or regulations (for example, offering educational services, organising entertainment, applying discounts beyond normal commercial conditions, providing any other goods or services).

Any external activities carried out by an employee of the Company, either a second job or self-employment, must be totally separate from Company activities. It is forbidden for employees to use their own working time or that of other Company employees, Company know-how or Company instruments for the benefit of their external activities.

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### **3.13. Anti-money laundering and anti-terrorism**

The Company opposes all forms of money laundering and sets out its internal procedures and regulations in such a way as to exclude as much as possible the risk of committing offences involving the receiving, recycling and use of money, goods or benefits of illicit origin.

The recipients of this Code are not to engage in any conduct that permits or facilitates the committing of the aforementioned offences, or the financing of activities for the purpose of terrorism or the subversion of democracy.

All recipients of this Code of Ethics are strictly bound to respect all the requirements of Italian Legislative Decree n. 231/07 and subsequent amendments, which forms part of Italian Legislative Decree n. 231/01, as applicable.

### **3.14. Intellectual property and intangible property rights**

The Company respects the intellectual property of third parties, such as copyright, trademark rights and patent rights or licenses. Restrictions on the use or copying of protected works require authorisation (license) from the holder of the relative rights.

## **4. Rules of conduct**

### **4.1. Principles of conduct**

The Company requires all recipients of this Code to always assume responsible behaviour, in compliance with the obtaining of Company objectives and in line with Company values and principles.

They must embrace the principles of the Company, playing an integral part in its cultural values and ensuring that internal relations are characterised by the utmost trust at all levels; between managers and their staff, between all personnel, and between the personnel and the Company.

This trust must be based on the profound sharing of corporate values and common goals.

To this end, the Company intends to promote a corporate culture aimed at raising awareness of the existence of internal regulations and processes.

Particular attention is required from all those who, due to the roles they fill or the duties they carry out, have access to confidential information concerning the Company.

All recipients of the Code of Ethics are therefore required to:

- strictly comply with internal regulations regarding confidentiality;

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- not disclose confidential information to third parties and to not use said confidential information for purposes other than their own duties;

- refrain from carrying out, either directly or indirectly, either on their own account or on behalf of third parties, any form of act using said confidential information.

All recipients of this Code must pursue legitimate Company objectives by refusing any unlawful agreements with representatives of Public Administration or other companies.

### **4.2. Employees**

Each employee must promote a “culture of legality” within their own framework and ensure that business activities comply with laws, regulations and internal processes.

The Company demands that all those in roles of responsibility or who carry out coordination activities should always act with courtesy and respect toward colleagues and collaborators, promoting professional growth.

Company employees must carry out their duties with commitment, loyalty, seriousness and a sense of responsibility in compliance with the law, the provisions of their contract and Company directives.

Company employees are responsible for the maintenance and protection of the goods and instruments that the Company makes available to them for the carrying out of working activities. Therefore any improper use of the aforementioned assets or instruments for purposes beyond the confines of their professional duties must be avoided.

All employees are required to handle data and information gained as a result of their working activity with the utmost confidentiality.

The Company expects all employees to always act with courtesy and respect towards their colleagues.

### **4.3. Intermediaries**

The Company adopts criteria of professionalism, impartiality and moral integrity in selecting its intermediaries.

Relationships with these figures are characterised by correctness and loyalty.

Intermediaries must carry out their activities with commitment, a sense of responsibility, loyalty and seriousness, in compliance with legal, contractual and company provisions.

Intermediaries are required to share the principles of this Code with the staff within their own organ-

isational structures and sales networks and must refrain from carrying out any act, even potentially or indirectly, for personal/particular interests in conflict with those of the Company, Intermediaries, with regard to their capacity as “controllers” or “processors” of personal data collected and/or processed by the same for the carrying out of their activities, must safeguard and protect said data in an appropriate manner in compliance with Privacy regulations and in line with company regulations.

#### **4.4. External collaborators**

The Company manages relations with its external collaborators fairly and with equality and mutual respect.

The Company requires its external collaborators to operate with correctness, honesty, diligence, seriousness and in compliance with the instructions given to them in relation to the assignment, and with the awareness that, in carrying out their role, they represent the Company.

Collaborators must undertake to guarantee compliance with the rules of confidentiality that they have signed, also adopting and signing this Code in all its parts.

External collaborators must avoid taking personal advantage of their professional relationship with the Company, acting in the sole interest of the Company, and must refrain from carrying out any act, even potentially or indirectly, for interests in conflict with those of the Company,

External collaborators must store and protect the personal data they receive for the activity entrusted to them in an appropriate manner that is compliant with Privacy regulations.

## **5. Compliance with the Code**

### **5.1. Principles**

The Company undertakes to distribute the Code of Ethics to all recipients.

### **5.2. Communication and control**

The Company promotes knowledge of the Code and approves any modifications and additions to the same.

The Company shall, in particular:

- communicate the Code’s regulations;
- ensure compliance by all recipients;
- manage updates;
- develop communication processes;
- provide guidance and suggestions in the event of doubts regarding interpretation, in order to ensure that the rules of the Code are applied correctly.

The Company oversees and supervises compliance with the Code in accordance with Legislative Decree n. 231 of 8 June 2001.

### **5.3. Violations and penalties**

Compliance with the rules and principles of the Code is an integral part of the contractual obligations of all recipients.

Employees who become aware of alleged violations of the Code’s principles and rules of conduct should report them to the Security Committee. Reports can be made by anonymously indicating any problems through the depositing of written information in the appropriate box located by the company noticeboard near the stairs in the employee entrance hall.

The Security Committee collects reports from employees, notifies cases and evaluates them, ensuring the confidentiality of the identity of the reporting parties in order to avoid any form of retaliation, discrimination or penalisation, without prejudice to legal obligations.

Employee behaviour that is contrary to the Code is sanctioned on the basis of the seriousness of the established facts, in strict compliance with the principles of the right to defence, on the basis of legal and contractual provisions.

Violations of the Code by employees will be subject to Company disciplinary actions.

Non-compliance with the Code by recipients may lead to termination of the contractual relationship in the event that a relationship of trust is lost or there is a serious breach of the obligations of correctness, good faith and loyalty in the execution of the contract.