



MARPOSS

INTEGRITY CODE



MARPOSS INTEGRITY CODE

PREAMBLE

PRINCIPLES

COMPLIANCE WITH LAW, REGULATIONS, SOCIAL RESPONSIBILITY AND SUSTAINABILITY

PRINCIPLES

VALUE OF HUMAN RESOURCES

BUSINESS ETHICS

SAFETY, ENVIRONMENT AND QUALITY

DATA PROTECTION AND CONFIDENTIALITY OF INFORMATION

PROTECTION OF INTELLECTUAL PROPERTY RIGHTS

ANTI-CORRUPTION POLICY

PROTECTION OF ASSETS

INFORMATION DISCLOSURE AND COMMUNICATION POLICY

COMPLIANCE

PREAMBLE

This document (hereinafter the “Integrity Code” or the “Code”) is adopted by Marposs S.p.A (hereinafter “Marposs”, “we”, “our”) and sets out the ethical principles and standards of behaviour which Marposs must strictly comply with. The principles of the Code are also intended to provide a reference framework for the relationship between Marposs and its affiliates and business partners.

The “Recipients” of this document are all those who hold offices of representation, administration or management, as well as all employees and any natural or legal persons working for Marposs on a contractual basis.

The Recipients are bound to the principles contained in this Integrity Code. Marposs does not accept any interpretations of the Code that result, or that risk resulting, in the contravention of any and all applicable laws. The fact the Recipient may believe they are acting in the interest of or for the benefit of Marposs or of any other persons does not justify any actions or omissions by that Recipient in contravention of this Integrity Code.

Marposs is committed to promoting the awareness and application of this Integrity Code amongst all Recipients through appropriate procedures to ensure that all Recipients become fully familiar with its principles.

PRINCIPLES

COMPLIANCE WITH LAW, REGULATIONS, SOCIAL RESPONSIBILITY AND SUSTAINABILITY PRINCIPLES

We operate in compliance with all applicable national and international laws, local norms, and the universal principles of corporate social responsibility and sustainability as recognized by the UN and the OECD. Due to the international nature of our business, we abide by all applicable and internationally-recognised restrictions on the trade of economic resources and of the export and import of goods, and by all applicable and internationally-recognised anti-money laundering and anti-terrorism provisions.

VALUE OF HUMAN RESOURCES

We recognize our global responsibility for, and are committed to the promotion of human rights and sustainable development. In every country, we respect human and labour rights and we neither tolerate nor condone any exploitative, illegal, unfair or discriminatory conditions of work.

BUSINESS ETHICS

We do business with our customers, suppliers and other business partners in a fair, transparent and impartial manner, free from any form of discrimination, prejudice or favouritism. We respect fair and free competition and comply with the applicable competition and antitrust rules. We do not engage in any arbitrary or exceptional forms of treatment towards, or conflicts of interest with, our suppliers, customers or any other business partners. We reject all kinds of misconduct, involvement in unlawful agreements, corruptive practices, bribery, oppressive behaviour or abuse of privileged positions.

SAFETY, ENVIRONMENT AND QUALITY

We trust that a healthy and safe work environment is conducive to employees' satisfaction and wellness, as well as better product quality, business success, economic sustainability, and public recognition. Our training and information programs aim to improve professional skills and promote a culture of risk awareness and accident prevention. Innovation and education are the cornerstones of the quality of our service to the customer and to the community. We abide by environmental protection programs by adopting measures that reduce atmospheric emissions, greenhouse gases, waste materials, polluting agents and water consumption.

DATA PROTECTION AND CONFIDENTIALITY OF INFORMATION

We handle all confidential and personal information in compliance with all applicable laws and regulations.

We protect business confidentiality and personal information through the use of appropriate measures that ensure the protection of data which is stored in-house or is entrusted to a third party.

Marposs places high importance on the use of enforceable cyber security measures, and on the correct and secure use of the company's personal computers and business-related IT devices by all Recipients.

PROTECTION OF INTELLECTUAL PROPERTY RIGHTS

Our innovations, inventions, technical and trade secrets, trademarks, and intellectual property rights (together, "IP Rights") constitute extremely valuable assets to the business.

Marposs is committed to protecting our IP Rights against loss, theft, misuse, careless use and unauthorized disclosure, including via social networks.

As well, Marposs respects all third parties' IP Rights and acts in compliance with all applicable laws.

ANTI-CORRUPTION POLICY

As company policy, Marposs does not offer, demand or accept the exchange of undue or improper advantage or benefits with other parties. Even under customary business practices and social norms, all Recipients must apply restraint when receiving or giving gifts or donations.

Recipients must not exchange gifts or other benefits in order to obtain unfair advantages for themselves, Marposs, or third parties.

PROTECTION OF ASSETS

Marposs requires that all assets, whether belonging to Marposs or to other parties, be used in accordance with all applicable laws, and with the required care, in order to minimize the risk of tampering, damage, theft, loss or unauthorized use.

INFORMATION DISCLOSURE AND COMMUNICATION POLICY

Marposs is committed to releasing timely, fair, transparent and accurate information disclosures with regards to its financial records, its business situation, its products and services in compliance with legal requirements. The disclosure (e.g. through the media or through social networks) of news, information or data relating to Marposs is exclusively the responsibility of, and under the jurisdiction of, the relevant department to the disclosure in question. Disclosure of false or misleading information or comments will not be permitted under any circumstances.

Any form of undue pressure or favouritism towards any individual media outlets must be avoided.

COMPLIANCE

Compliance with the Integrity Code constitutes an essential part of a Recipient's contractual relationship with Marposs. Any violations of the Integrity Code may result in extremely serious repercussions with regards to the Recipient's relationship with Marposs.

Marposs possesses the tools required for monitoring Recipients' level of compliance with the provisions of this Integrity Code.

Marposs has put measures and mechanisms in place to ensure that any acts against this Code can be reported and treated in a confidential way, and that the reporters are protected against unfair treatment or retaliation, in accordance with all applicable laws.

Marposs will implement appropriate corrective actions whenever non-compliance with, or violation of, the provisions of the Integrity Code has been established.



Stefano Possati
President



MARPOSS

www.marposs.com

Edition 12/2023 - Specifications are subject to modifications.
© Copyright 2019 - 2023 MARPOSS S.p.A. (Italy) - All rights reserved.