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 Cap.soc. i.v. € 25.000,00 - R.E.A BG 288455  
 P.IVA / C.F. / Nr. Reg. imp. BG 02427400169



# CODE OF ETHICS

|             |             |   |                             |                    |
|-------------|-------------|---|-----------------------------|--------------------|
| 0           | 01/02/2018  | First release   |                             |                    |
| 1           | 20/06/2018  | More detailed theme "Policy escalation/ whistle-blowing". |                             |                    |
| 2           | 01/03/2022  | Title change and general review (minor formal amendments) |                             |                    |
| 3           | 01/03/2024  | General review  | Management Review Committee | CEO                |
| <b>Rev.</b> | <b>Date</b> | <b>Description</b>  | <b>Issued by</b>            | <b>Approved by</b> |



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## Letter from the CEO

*Sala Italdadi S.r.l., specialized in manufacturing of cold forming fasteners, was founded in 1996 acquiring the production of "Officina Meccanica Sala Francesco", a manufacturer of fasteners since 1960s. Today, thanks to the evolution of the production process and the constant search for improvement in qualitative aspect, Sala Italdadi S.r.l., together with the other two companies of the Group, is one of the main suppliers of the Automotive sector in Italy.*

*Some of the secrets behind this success are the guarantee of a safe and non-discriminatory working environment, the investments in research and innovation, the attention to environmental impact and the maintenance of the highest quality standards in the production and in offering services to the customers.*

*The growth of the business and the satisfaction in achieving increasingly results have led to an increased complexity of the situations that Sala Italdadi S.r.l. has to face day – by – day from a technical, commercial, qualitative and legislative point of view.*

*Then, it is necessary to define a Code of Ethics which contains information and guidelines for all internal and external activities in correlation to legal requirements and self-regulation obligations.*

*We truly believe that the respect of the principles contained in this Code of Ethics represents the starting point for successfully conducting activities in compliance with the ethical and moral requirements aimed at making them sustainable, improving the results pursued.*

*The key to protect the integrity, the reputation and the development of Sala Italdadi S.r.l. consist in responsible and conscious conduct of each employee, collaborator and supplier: in this regard, we ask all recipients of this Code of Ethics to adopt a behaviour in line with Sala Italdadi S.r.l. ideals, contributing to the process of continuous strengthening of the trust that our stakeholders place in us.*

*Sala Italdadi S.r.l. wants to join a business activity to achieve excellent technical performance in line with market needs and match the quotation ensuring the highest level of competence and service in order to generate more dependable income and ensuring ongoing corporate success.*

*This performance should be carried out in compliance with the law and without damage the general morality and in the utmost care and attention to the individual.*

*For these reasons Sala Italdadi S.r.l. includes environmental, social and economic sustainability in the company's investment and growth strategies.*

*The Code of Ethics is approved by the CEO and is distributed and shared with members, customers, persons in charge, employees, direct and non-direct collaborators, partners and suppliers.*

*Sala Italdadi S.r.l. does not maintain relationships with anyone who does not apply the principles of this Code of Ethics.*

*In the event of a person in charge, an employee or collaborator, he or she will incur all disciplinary actions provided for by the current legislation related to the protection of the integrity of the company.*

*Sala Italdadi S.r.l. declares to reject discrimination of any kind against any individual or any group based on factors such as race, political ideas, religious convictions, family background, disability, and anything else that can be obstacle to the people dignity preventing their professional growth.*

**Sala Paolo  
CEO**



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# 1. Introduction

## 1.1 Purposes

The Code of Ethics is the compass that guides the behaviour and actions of Sala Italdadi S.r.l. .

It contains the values to which all recipients must conform, accepting responsibilities, roles and rules to be complied with in order to avoid liabilities towards the Company and its shareholders.

The Code of Ethics is part of the Company's strategy and organisation and represents one of the main tools to ensure compliance with the principles and values that have characterised Sala Italdadi S.r.l. since its constitution.

## 1.2 Recipients

The Code of Ethics applies to the following persons:

- members, agents, statutory auditors, persons in charge and employees of Sala Italdadi S.r.l. ;
- collaborators, consultants and any other person and entity that, directly or indirectly, permanently or temporarily, acts in the name and on behalf of Sala Italdadi S.r.l. ;
- third parties who, for whatever reason, have relations with Sala Italdadi S.r.l.

Sala Italdadi S.r.l. is committed to ensuring the distribution and knowledge of the Code of Ethics among its recipients and to facilitating its correct interpretation.

All recipients undertake to:

- comply with the principles and provisions set forth therein;
- report violations of which they become aware in a timely manner;
- cooperate in defining and complying with the internal procedures implementing the Code of Ethics;
- consult their superior or the person in charge, in relation to those parts of the Code of Ethics on which they need clarification.



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## 2. Corporate identity

### 2.1 Mission

The company “Mission” is to supply our customers with the best solutions in nuts and screw for the automotive, motorcycle, electric and hydraulic sector, and all components; producing and marketing products we can be proud of.

Screws, nuts, bolts are the story of the company, they are what Sala Italdadi S.r.l. is recognised and respected for around the world.

**The company activity of Sala Italdadi S.r.l. takes place in the only headquarters in**

**Via Guglielmo Marconi 29/e  
24036 – Ponte San Pietro (BG) – Italy**

(registered office, management offices, production departments and shipping warehouse)

### 2.2 Vision

In particular, in pursuing its mission statement, Sala Italdadi S.r.l.:

- constantly develops and uses state-of-the-art technology;
- actively undertakes to preserve and protect the environment;
- develops close relationships with its customers, listening to their needs and providing specific solutions;
- pursues the highest quality standards of the products and services offered (total quality);
- strives for the full satisfaction of its customers as the ultimate goal of every business activity;
- operates on a global scale, providing its products and services to customers from all over the world.

### 2.3 Values

The mission statement and company vision are based on the shared values that guide the activities of Sala Italdadi S.r.l..

People are the main and constant point of reference for every action, choice and decision.

#### **THE CHARTER OF VALUES**

##### **1. RESPECT**

*Sala Italdadi S.r.l. considers the dignity of each individual as the guiding principle of any activity.*

*Sala Italdadi S.r.l. observes and promotes respect for human rights and does not tolerate any behaviour in any way detrimental to human dignity.*

*Sala Italdadi S.r.l. does not use child labour, provides fair compensation and benefits in accordance with applicable law, does not use forced or compulsory labour, recognises and respects the right to work and freedom of association, does not tolerate any form of discrimination, complies with working time regulations, does not tolerate*



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*and does not make use of trafficking in human beings and slavery.*

*Sala Italdadi S.r.l. Sala Italdadi S.r.l. orients its activities towards compliance with environmental factors and the relevant laws and regulations, at every stage of the production process, undertaking to:*

- continuously improve its performance by reducing the environmental impact;*
- increase energy and water savings by making appropriate use of natural resources;*
- control and reduce waste production and improve its recovery and recycling;*
- fight climate change in the front line, constantly seeking to reduce emissions released into the atmosphere.*

## **2. COMMUNICATION**

*Sala Italdadi S.r.l. considers communication a prerequisite for establishing constructive relations and creating a climate of collaboration both inside and outside the company.*

*For this reason, it is important that all employees and collaborators make their communications with the utmost care and attention, whoever the recipient may be, so that they are clear, effective and comply with the values contained in this Code of Ethics.*

## **3. INNOVATION**

*Sala Italdadi S.r.l. is a dynamic company and believes in innovation, in all its possible forms, as a driver of success.*

*Sala Italdadi S.r.l. guarantees the best conditions so that creativity and inventiveness can always produce new and optimal solutions and customer satisfaction.*

## **4. TEAMWORK**

*Sala Italdadi S.r.l. believes that the teamwork and the involvement of employees and collaborators is the most effective way to achieve a goal.*

*It stimulates learning and creativity, allows to combine and enhance the strong points of individual group members, ensures efficiency in solving complex problems, strengthens the relations between individuals and increases the sense of belonging to the company.*

*Based on the above, Sala Italdadi S.r.l. promotes cooperation, information sharing and teamworking among its employees and collaborators at every level and for every business activity.*

## **5. CONTINUOUS LEARNING**

*Sala Italdadi S.r.l. is convinced that accessing and sharing information and knowledge is one of the most important tools for growth.*

*In an ever-changing world where technology is rapidly becoming obsolete, continuous learning is the life blood to meet the challenges of the future.*

## **6. PROACTIVITY**

*Sala Italdadi S.r.l. is a proactive company oriented towards understanding its customers' needs in advance and providing effective solutions to their problems even before they arise.*



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## 7. RESPONSIBILITY

*Sala Italdadi S.r.l. is responsible for its own actions.*

*Individually and collectively: of time, money, all the resources consumed and the results obtained.*

## 8. SUSTAINABILITY

*Sala Italdadi S.r.l. implements, observes and integrates with its core business activities the best economic, social and environmental practices aimed at ensuring the pursuit of long-term value for members, customers, partners, community, employees and the environment.*

*Sala Italdadi S.r.l.'s primary goal is a more responsible, balanced and sustainable future.*

These **shared values** characterise Sala Italdadi S.r.l. on the market for its unique style and inside for the great sense of belonging of all its collaborators.

The competitive situations in which Sala Italdadi S.r.l. operates, the challenges of sustainable development and the need to take into account the interests and expectations of stakeholders with regard to the company's activities reinforce the importance of clearly defining the values and responsibilities that Sala Italdadi S.r.l. recognises, accepts and shares.

The following chapters are organised and reflect this very logic:

- relations with the community;
- environmental protection
- relations with employees and collaborators;
- behaviour in business;
- data protection;
- use and management of company resources and information;
- relations with Public Administration.





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## 3. Relations with the community

### 3.1 Respect for Human Rights

Sala Italdadi S.r.l. acts in accordance with the legal provisions in force and ensures the protection of proclaimed human rights, guaranteeing that it is not involved in human rights' violations, and stating that health and safety are always taken into account in order to contribute to sustainable development.

### 3.2 Respecting and promoting local community

Sala Italdadi S.r.l. supports the development and cohesion of the territory in which it operates, offering employment and growth opportunities to the local community and working to restore shared value.

Sala Italdadi S.r.l. accepts requests relating to the impacts and repercussions of its activity on the territory, and ensures maximum availability for discussion with the local community.

Sala Italdadi S.r.l. is also committed to supporting, as far as possible, the needs and requirements - not only material - of the community, giving support to those who intend to promote initiatives in support of the common good.

### 3.3 Political issues

Sala Italdadi S.r.l. does not interfere in the political life of the community in which it operates and does not provide contributions or funding to political parties or people in politics.



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## 4. Environmental protection

Sala Italdadi S.r.l. takes into account the protection of the environment in all its activities using technologies and production standards that reduce the environmental impact and the creation of any inconvenience for the local community.

Therefore, all recipients of the Code of Ethics are required to assess in advance and manage the environmental impact of the business activities of Sala Italdadi S.r.l. in accordance with the highest quality standards, as well as to intervene in a timely and appropriate manner to avoid behaviour that could endanger the environment and the health of the local community.

It is our commitment:

- Respect all applicable laws on environmental protection and comply with other obligations of compliance of stakeholders;
- Spread specific responsibilities at all levels aimed at monitoring and applying the environmental protection regulations of the law and internal provisions;
- To ensure that environmental impacts are reduced over time, adopting, as far as possible, technical standards, knowledge and advanced techniques (such as, for example: the use of energy from renewable sources and the use of substances and materials with the lowest possible environmental impact);
- Grow a proactive culture over time aimed at achieving safe behaviors and attitudes on the part of personnel in terms of environmental protection;
- Define specific objectives for continuous improvement for environmental performance.
- Include environmental, social and economic sustainability in corporate investment and growth strategies.



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## 5. Relations with employees and collaborators

The CEO and the persons in charge must verify that subordinates are treated in an appropriate way to their abilities and without any form of discrimination.

They must also ensure a clear and effective internal and external communication, as this establishes the company's development.

The CEO, each person in charge, employee or collaborator must avoid:

- Work under the influence of alcohol or drugs;
- Blaspheming or expressing oneself in a scurrilous manner, show vulgar behavior and/or attitudes;
- Behaving attitudes may intimidate colleagues;
- Have offensive attitudes towards colleagues;
- Have attitudes aimed at defaming the work or the professionalism of colleagues;
- Behaving attitudes that can damage the health and safety of others.

### 5.1 Equal opportunities and equal treatment

Equal opportunities and equal treatment are the fundamental prerequisites for transparent, fair and unbiased relationships. Therefore, Sala Italdadi S.r.l. promotes inclusion and tolerance in human relations, based on respect and collaboration.

Sala Italdadi S.r.l. is committed to ensuring that, from the selection of personnel to the day-to-day carrying out of the professional relationship, equal opportunities within the company structure are guaranteed and no discrimination of any kind on the grounds of ethnicity, gender, language, religion, political opinion, social origin, disability or any other condition is tolerated.

Sala Italdadi S.r.l. considers diversity as a value for the company.

For this reason, it undertakes to respect and value the exclusive contribution of each individual and to create an inclusive work environment that respects the dignity of each worker, taking into account the contribution of each and recognising the strength of differences.

### 5.2 Occupational health and safety

Sala Italdadi S.r.l. is committed to protecting the health and safety of the working environment for employees and third parties who have access to it.

To this end, in accordance with current accident prevention regulations, Sala Italdadi S.r.l.:

- carry out and update the risk assessment in order to plan the most appropriate measures to protect occupational health and safety;
- promote the participation of workers' representatives in the planning of measures to protect occupational health and safety;
- concretely adopt prevention and protection measures;
- organise training and information courses for employees and raise awareness of all recipients of the Code of Ethics on issues related to occupational health and safety;
- provide a safe and healthy environment for all employees;
- uses, in its production cycle, materials and equipment that comply with regulations, taking care of the correct use and maintenance of efficiency;



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- comply with the legal provisions in force in terms of working time.

Each recipient of the Code of Ethics, regardless of his or her role, is called upon to contribute to occupational health and safety, avoiding activities that could be dangerous for his or her own life and safety and that of his or her colleagues.

### 5.3 Workers' rights and freedom of association

Sala Italdadi S.r.l. recognises and respects the right of its employees to associate and be represented by trade unions or elected representatives in compliance with the law.

Trade union negotiations are carried out by the companies belonging to Sala Italdadi S.r.l. in a constructive manner in order to achieve the best solution to reconcile company and employees needs.

SALA ITALDADI is committed to ensuring maximum respect for the human person, reserving to all its collaborators the right personal and professional consideration, the correct remuneration, within the terms established, and the right payment of social security contributions.

### 5.4. Harassment and mobbing

Sala Italdadi S.r.l. condemns any behaviour that is harassing, intimidating, offensive, persecutory or otherwise detrimental to the personal and professional dignity or psychological and physical health of its employees and collaborators.

To this end, Sala Italdadi S.r.l. undertakes to adopt policies to prevent such behaviour and guarantees the right to report it.

### 5.5. Fair Recruitment and promotions

Sala Italdadi S.r.l. fully subscribes and exclusively applies the principles of Fair Recruitment of the ILO (International Labour Organization); moreover, it has always applied the meritocratic principle in the promotion of employees.

Sala Italdadi S.r.l.'s employees are selected and advance in their careers only on the basis of the quality of their contribution to work and the achievement of the company's objectives.

Salaries and other related benefits are granted in accordance with the collective agreement.

Therefore, all recipients of the Code of Ethics must refrain from unlawfully requesting, accepting, receiving, promising or paying money or other benefits to facilitate or guarantee the employment of a person as an employee or his or her transfer or promotion.

Sala Italdadi S.r.l. does not use child labour and acts in compliance with the laws in force.

### 5.6. Training and lifelong learning

Sala Italdadi S.r.l. is aware that the main factor in the success of any company is the contribution of each individual employee and collaborator.



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For this reason, Sala Italdadi S.r.l. is committed to offering training aimed at developing the skills and competences of each one and at fully exploiting the resources in their work activities.



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## 6. Behaviour in business

### 6.1. Compliance with law

Sala Italdadi S.r.l. is committed to ensuring that its activities are carried out in compliance with applicable national and international regulations by:

- requesting all Sala Italdadi S.r.l.'s employees and collaborators to obtain prior information on the current regulatory framework and to adapt the activities carried out;
- relying, if necessary, to a legal department for any clarification on the lawfulness of potential transactions in consideration of existing regulations and their correct interpretation;
- guaranteeing the right to use a system for reporting a behaviour in violation of the law suitable to guarantee, even with computerised methods, the confidentiality of the identity of the whistle-blower;
- applying appropriate disciplinary sanctions as well as reserving the right to report to the competent civil, administrative and criminal authorities violations of law committed by the recipients of the Code of Ethics.

### 6.2. Selection of suppliers and management of related business relations

The choice of suppliers is of fundamental value in order to improve the overall competitiveness of Sala Italdadi S.r.l..

Therefore, Sala Italdadi S.r.l. selects suppliers through transparent procedures based on objective criteria that take into account, among other things, the quality, innovation, reliability and cost of the products and services offered.

In this selection, social and environmental performance and compliance with the principles set out in the Code of Ethics in the conduct of business, including respect for human rights and occupational health and safety regulations and responsible sourcing of raw materials.

Relations with suppliers are regulated only by objective criteria.

Under no circumstances may the personal relationships and interests of the CEO, an employee or collaborator affect the award of a contract or order.

No collaborator may, directly or indirectly, obtain personal benefits from the award of a supply contract.

Sala Italdadi S.r.l. encourages its suppliers to apply the same criteria for the selection of subcontractors with the aim of promoting compliance with the principles of the Code of Ethics throughout the supply chain.

We only use suppliers who guarantee respect for people and do not use child labor

The CEO and employees of Sala Italdadi S.r.l. establish and maintain stable, transparent and cooperative relationships with suppliers, in line with best business practice.

Sala Italdadi S.r.l. does not intend to gain competitive advantages from suppliers on the basis of irresponsible behaviour and undertakes to avoid exploiting the supplier's position of dependence or weakness in existing relationships.

In this context, Sala Italdadi S.r.l. prefers a direct relationship with the supplier, without recourse to intermediaries.



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### 6.3. Relations with customers and business ethics

Relations with customers must aim to guarantee excellence in terms of product, service and quality, while ensuring compliance with environmental and safety regulations.

These relations are based on the adoption of reliable, correct and transparent behaviour, in compliance with the principles of honesty, fairness, good faith, respect for market and competition rules.

Commercial incentives must be aligned with market practices and in any case comply with the rules established by Sala Italdadi S.r.l..

Sala Italdadi S.r.l. avoid having relationships of any kind with commercial counterparties who are known to be carrying out risky or illegal activities.

It is not allowed to make sales below cost or with a negligible margin, which may generate financial danger to SALA ITALDADI and/or generate the failure to maintain over time the conditions promised during the offer to the customer.

No counterfeit goods are produced and/or sold.

### 6.4. Competition laws

The activities of Sala Italdadi S.r.l., including relations with competitors, suppliers or customers, are carried out exclusively in compliance with free and effective competition.

Therefore, the CEO, employees and collaborators ensure that no practices are carried out in violation of the rules protecting competition (including, by way of example only, the creation of cartels, market sharing, production or sales restrictions and conditional agreements).

Moreover, Sala Italdadi S.r.l. does not allow the collection of information on competitors (e.g. manufacturing methods and technologies) by unlawful or unethical means (e.g. theft, corruption, misrepresentations and electronic espionage).

### 6.5 Corruption and illegal payments

Sala Italdadi S.r.l. is committed to the highest standards of integrity, honesty and fairness in all relations inside and outside the Company and adopts a policy of “zero tolerance” towards any phenomenon of corruption attributable to the CEO, employees and collaborators.

Therefore, all recipients acting on behalf of companies belonging to Sala Italdadi S.r.l. are required to refrain from any behaviour that is in violation of the anti-corruption regulations in force.

### 6.6. Gifts and sponsorships

Each employee or collaborator of Sala Italdadi S.r.l. must refrain from offering or accepting personal advantages, gifts or donations of a value exceeding a reasonable limit or which are not in line with normal business relations and which could affect the normal course of business of Sala Italdadi S.r.l.



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## 6.7. Conflicts of interest

Sala Italdadi S.r.l. believes it is essential that any decision related to the company's activities is not or does not appear to be affected by private interests that are in conflict with the business interests.

Therefore, all those who act in the name and on behalf of Sala Italdadi S.r.l. must avoid any situation that may cast doubt on their independence of judgement or conflict with their responsibilities and duties.

Should such situations occur, the person concerned must promptly inform the person directly in charge in a timely manner and/or follow the reporting procedures described in the specific paragraph of this document.

The CEO, employees and collaborators cannot use for their own purposes company information, assets and equipment made available for the normal performance of work

Each employee and collaborator should avoid carrying out activities which are in competition or conflict of interest by the ones held from Sala Italdadi S.r.l., even through the interposition of the third parties.

## 6.8. Anti-money laundering and countering terrorist financing

Sala Italdadi S.r.l. undertakes to ensure that, during the course of its business activities, no one behaves in such a way as to favour illegal activities and criminal or terrorist organisations, strictly complying with the applicable anti-money laundering and anti-terrorism regulations.

To this end, among other things, Sala Italdadi S.r.l. checks with the utmost diligence:

- the respectability of its commercial counterparts and the legitimacy of their activities before establishing business relations with them;
- the absence of risk, potential or otherwise, that the commercial transactions of which it is a party favour the receipt or replacement or use of money or goods deriving from criminal activities or may be intended to finance terrorist groups.

Moreover, each employee or collaborator of Sala Italdadi S.r.l. must refrain from receiving or accepting the promise of cash payments or laundering money, goods or other benefits deriving from illegal or criminal activities, as well as carrying out operations such as to hinder the identification of their origin.

## 6.9. Exports and sanctions, customs activities

The international dimension of Sala Italdadi S.r.l. requires continuous compliance with rules of customs law, international trade law and tax law.

Certain laws restrict the export of certain goods or technology to specific countries or individuals.

Other laws prohibit doing business of any kind with certain individuals or legal entities.

Therefore, the CEO, employees and collaborators are required to act in such a way that any legal constraints are observed and that taxes and duties payable by Sala Italdadi S.r.l. are calculated correctly, in a complete and timely manner, and paid to the competent tax authorities.





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## 6.10. Regularity of accounting transaction

The law requires the preparation of specific accounting documents and financial statements.

The presence of irregularities can have serious consequences for Sala Italdadi S.r.l. and for those who hold positions of responsibility within the corporate structure.

Moreover, customers, partners, government bodies and other interested parties rely on information obtained from the accounting records of companies belonging to Sala Italdadi S.r.l..

Therefore, Sala Italdadi S.r.l. undertakes to comply with the provisions of the law on financial statements and current accounting procedures by preparing authentic, reliable and verifiable accounting records.

Sala Italdadi S.r.l. has appointed an independent comptroller of high reputation on the market to ensure a rigorous audit.

## 6.11. Protection of the confidentiality of customer and supplier information

Sala Italdadi S.r.l. is committed to protecting and making responsible use of the ideas, innovations, technologies, brands and confidential information of the customers and suppliers with whom it does business and of which it becomes aware for professional reasons.

The collaborators of Sala Italdadi S.r.l. are required not to use confidential information obtained from customers and/or suppliers for purposes unrelated to the running of their business.

Information, knowledge and data acquired or processed in the course of their work or through their duties belong to Sala Italdadi S.r.l. and may not be used, communicated or disclosed without the specific authorisation of the CEO in compliance with specific procedures.

Sala Italdadi S.r.l. takes all reasonable and necessary actions to ensure that confidential information of customers and/or suppliers are not used in order to gain competitive advantages and undertakes not to use it in an opportunistic manner in order to maximise the outcome of negotiations in its favour.

It is always forbidden to send other bidders information regarding the identity of a bidder or the contents of its bid.



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## 7. Data protection

Sala Italdadi S.r.l. complies with the regulations on the protection of personal data by protect the personal data of employees, former employees, customers, suppliers and other data subjects.

In particular, in its capacity of data controller or data processor, Sala Italdadi S.r.l. comply with the following criteria, among other things:

- transparency towards data subjects, guaranteeing their right to know the personal information collected, the reasons
- for its collection and its possible disclosure;
- lawfulness and correctness of treatment;
- relevance of the processing with the stated and pursued purposes, not using the data for secondary purposes
- without the consent of the data subject (except in cases where the law does not require it);
- disclosure of personal data to third parties only with the consent of the data subject (unless required by law);
- data quality and accuracy;
- guarantee of the right of the data subject to view and request correction and/or deletion of personal data.

Each employee or collaborator must process personal data, sensitive and confidential information, of the Sala Italdadi S.r.l. and of third parties, in compliance with all laws in terms of privacy and privacy, avoiding any misuse.



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## 8. Use and management of company resources and information

### 8.1 Security and protection of information, know-how and intellectual property

SALA ITALDADI S.r.l. does not design the product, but only the process.

The intellectual assets generated by this activity constitute a central and essential asset of Sala Italdadi S.r.l..

The CEO, employees and collaborators are required to actively contribute, as part of the functions and responsibilities held, to the governance of the Sala Italdadi S.r.l.'s intellectual assets to enable their development, protection and enhancement.

Information, knowledge and data acquired or processed in the course of their work or through their duties belong to Sala Italdadi S.r.l. and may not be used, communicated or disclosed without the specific authorisation of the CEO in compliance with specific procedures.

The unauthorised disclosure of such knowledge can lead to serious financial damage, Sala Italdadi S.r.l. reserve all rights to take legal actions before the competent courts to protect the company's intellectual property.

The CEO, employees and collaborators cannot use for their own purposes company information, assets and equipment made available for the normal performance of work.

### 8.2 Use of company assets

The tangible and intangible assets of Sala Italdadi S.r.l. are functional to the carrying-on of business activities and, therefore, to the achievement of the Sala Italdadi S.r.l.'s goals.

Each employee and collaborator of the companies belonging to Sala Italdadi S.r.l. is responsible for the protection of the company resources granted to him/her and shall promptly inform the person directly in charge of any threats or detrimental events for Sala Italdadi S.r.l. (and/or follow the reporting procedures described in the specific paragraph of this document).

Company assets must be used in accordance with the appropriate operating procedures and for the intended purposes as well as diligently, so as to prevent, among other things, damage being caused or their efficiency reduced.

Each employee and collaborator must also take appropriate precautions to protect company assets from theft, loss, damage, destruction, abuse or improper, unauthorised or illegal use.

The CEO, employees and collaborators cannot use for their own purposes company information, assets and equipment made available for the normal performance of work.

### 8.3 Use of company IT tools

In order to carry on the business activities at all levels, Sala Italdadi S.r.l. makes the most up-to-date IT tools available to employees and collaborators.



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When using these assets for company or external communication purposes, their holders must refrain from using them in a manner offensive to the dignity of others or to the reputation of Sala Italdadi S.r.l..

They must also follow the instructions given at the time of delivery to ensure the safety of the devices and the information they contain.

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## 9. Relations with public administration

### 9.1. Collaboration and integrity

Sala Italdadi S.r.l. attaches great importance to supporting and collaborating with public administration, respecting the laws and regulations governing transactions with them and making data and information available in a timely and accurate manner, where required.

Each employee or collaborator of Sala Italdadi S.r.l. is required to carry out his or her duties with any public administration, body or employee of same in accordance with market conditions, refraining from offering advantages such as bribes, gifts or preferential treatments in the course of relations with them, in compliance with current regulations and on the basis of maximum loyalty and fairness.



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## 10. Violations

The observance of the Code must be considered an essential part of the contractual obligations assumed by collaborators and/or subjects having business relationship with the company.

It is the task of the CEO and the persons in charge to ensure that it is understood, even with own behavior, the importance of compliance with what is indicated in the Code and verify the exact compliance of the Code of Ethics.

### 10.1 Violations

Violations of the Code of Ethics compromise the relationship of trust with Sala Italdadi S.r.l. and may constitute a breach of contractual obligations.

In particular, compliance with the provisions of the Code is a fundamental part of the contractual obligations of the employees of Sala Italdadi S.r.l., subject to and in accordance with the applicable laws and regulations.

In any case, the right to report violations of the Code of Ethics is guaranteed, by follow the procedures described in the specific paragraph of this document.

With reference to the notice of violation or attempted violation of the rules contained in the Code of Ethics, it will be the Company's responsibility to ensure that no one, at work, may be subject to retaliation, unlawful conditioning, distress and discrimination of any kind, for having reported the violation of the contents of the Code of Ethics or of internal procedures.

Moreover, following the whistle-blowing, the company will promptly follow up appropriate checks and, if necessary, appropriate sanctions.

Any form of retaliation against those who reported possible violations of the Code of Ethics or requests for clarification on its application methods also constitutes a violation of the Code of Ethics.

Such violations will be prosecuted by the companies belonging to Sala Italdadi S.r.l. effectively, promptly and immediately, in disciplinary procedures and, where appropriate, before the court.

Sala Italdadi S.r.l., in order to protect its image and its resources, will not enter into relations of any kind with persons who do not intend to operate in strict compliance with the regulations in force, and/or who refuse to behave in accordance with the values and principles laid down in the Code of Ethics and to comply with the procedures and regulations set out in the attached protocols.

### 10.2 Notifications, reports and whistleblowing

Anyone who becomes aware of violations of this Code of Ethics can report them in the following ways:



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## INTERNAL BOX FOR COLLECTING REPORTS

At the operational headquarters of:

**Sala Italdadi S.r.l**  
**Via Guglielmo Marconi 29/e**  
**24036 – Ponte San Pietro (BG) – ItaliY**

in an appropriately reserved area, a box is available to all employees in which to collect notifications and reports in a protected format.

The box key shall be kept by a person outside the organization (RSPP - Person in charge of health and safety prevention and protection service) and it will be open periodically by a team of of three people (CEO, Quality Assurance manager representing their own workers and RSPP as third party contracted).

The team will carry out a verification of the box and any notifications and reports, ensuring the taking charge of what reported and the anonymity of the reporter.

## WEB PLATFORM

By accessing the web platform:

<https://salabullonerie.trusty.report/>

The email box will be opened periodically by a team of three people (General Management representing the Entrepreneurial Ownership, RSGQ - Quality Assurance Manager representing the Workers and RSPP as a third party).

The team will carry out a verification of any notifications and reports,, ensuring the taking charge of what reported and the anonymity of the reporter.



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## 11. Final provisions

### 11.1 Accessibility and interpretation

The Code of Ethics is distributed and shared with members, customers, persons in charge, employees, direct and non-direct collaborators, partners and suppliers.

The Code can be consulted and freely downloaded from Sala Italdadi S.r.l.'s website at

<https://www.salabullonerie.com/italdadi/>

The same link can be found on documents exchanged with clients and suppliers.

A copy of the Code may also be requested to the email address:

[info@salaitaldadi.it](mailto:info@salaitaldadi.it).

Furthermore, the Code of Ethics is posted on the company noticeboard

Sala Italdadi S.r.l. organises training and information meetings on the topics contained in this Code of Ethics.

If in doubt about the interpretation of the Code of Ethics, or if it is in conflict with the Sala Italdadi S.r.l.'s compliance programmes, policies or procedures, please send request/report by accessing the web platform:

<https://salabullonerie.trusty.report/>

### 11.2 Review

The Code of Ethics is subject to periodic review by the committee that participates in the Management Review of Sala Italdadi S.r.l. and, if circumstances make it necessary, by the committee itself in specifically convened meetings.

The review activity takes into account the comments and suggestions received from employees, collaborators and third parties, regulatory developments and the most established international practices, as well as the experience acquired in the application of the Code of Ethics itself.

Any update, modification or addition to the same must be approved by the General CEO and the subsequent distribution and sharing takes place with the same methods previously described.





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## Receipt and confirmation

I confirm that I have received my copy of the Sala Italdadi S.r.l. **Code of Ethics**.

I declare that I know and adhere to the principles and standards of conduct of the **Code of Ethics**.

Place, date: \_\_\_\_\_

Company: \_\_\_\_\_

Name (in block letters): \_\_\_\_\_

Signature: \_\_\_\_\_

Please give this receipt to your contact in Sala Italdadi S.r.l., or send it to the email address:

[info@salaitaldadi.it](mailto:info@salaitaldadi.it)