



Besfond

## CODE OF CONDUCT

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## 1. INTRODUCTION

This document, called "Code of Conduct" (hereinafter, also "Code") is an official document that expresses the values and regulates the set of rights, duties and responsibilities that Besfond Srl (hereinafter also "Besfond") assumes in the management of his own company activity and in relations with all those who interact with it. Ethics in entrepreneurial activity is of fundamental importance for the proper functioning and credibility towards employees, customers and suppliers and more generally towards the entire socio-economic context in which the company itself operates. The Board of Directors therefore has decided to adopt the present Code which aims to confirm and establish in a document the principles of correctness, loyalty, integrity and transparency of conduct, to operate and to manage relationships both internally and with third parties.

### 1.1. Recipients of the Code of Conduct

The Code of Conduct, as part of the Model pursuant to Legislative Decree no. 231/01, is directed to:

- corporate bodies
- workers, including temporary workers
- consultants and collaborators
- stakeholders
- any other person who may act in the name and on behalf of the Company.

All these subjects are required to know the content of the Code, to contribute to its implementation and to the spread of its principles.

### 1.2. Implementation and control

The implementation of the Code of Conduct is carried out by the Board of Directors. Its control and its correct application are delegated to the Board of Directors and the Supervisory Body, which are responsible for:

- monitoring compliance with the Code and its dissemination to all recipients
- verifying any reporting of violation of the Code and adopting any needed sanctioning measures
- proposing changes to the content of the Code to adapt it to the changing context in which the company operates and to the needs arising from the evolution of the company itself.

### 1.3. Dissemination of the Code

Besfond is committed to ensuring the widest possible dissemination of this Code of Conduct, through the use of appropriate tools. In particular, this Code is available for consultation at Besfond offices, is saved in a specific folder on the corporate network, is published on the corporate website and is posted on the bulletin board. Any subsequent update and revision of the document will be notified to the recipients through suitable communication tools.

### 1.4. Violation of the Code

The detection of any conduct that does not comply with the law and / or company regulations or with this Code must be promptly reported in a written form to the Supervisory Body. In particular, behaviours that differ from the



Organizational Model as well as the Code of Conduct adopted by Besfond will be punished according to their severity or their recidivism with different measures depending also on the categories of interested parties. In particular:

- The non-compliance of this Code of Conduct by Management's implies the application of a letter of recall by the Supervisory Body and the persistence of this illegitimate attitude will result in the immediate suspension of the validity of this Organizational Model
- Compliance with this Code of Conduct must be considered an integral part of the contractual obligations of Besfond employees pursuant to and for the purposes of the provisions of art. 2104 and following of the Italian Civil Code. Failure to comply with the indications and principles contained herein damages the relationship of trust established with the company and therefore constitutes a disciplinary offense that will be punished through the sanction system adopted by the company
- The company extends this obligation also to external collaborators and contractual counterparties and in this case, any non-compliance with the Code could result in the termination of the contract and / or the assignment and potential compensation for damages caused.

Besfond guarantees that no one may suffer any retaliation for providing information on possible violations of the Code and the relevant standards.

## **2. GENERAL PRINCIPLES OF CONDUCT IN BESFOND**

### **2.1. Besfond's mission and values**

Besfond's mission is to translate customer requests into ductile and lamellar cast iron castings produced in small and medium series through a sand-resin molding process. Besfond oversees the entire production process from the design phase to final testing, ensuring complete product traceability and high-quality standards.

The values that distinguish it are passion, pride and flexibility.

### **2.2. General principles of conduct**

The recipients of this Code of Ethics must comply with the following guiding principles:

- ✓ Legality and Transparency
- ✓ Fairness and Impartiality
- ✓ Reliability, Professionalism and Confidentiality
- ✓ Health, Safety and Environment

## **3. BEHAVIOR IN THE MANAGEMENT OF BUSINESS**

Recipients are required, in carrying out company activities, to behave ethically and in compliance with laws, protocols and internal procedures, based on maximum transparency, clarity, correctness and efficiency.

### **3.1. Relations with customers**

Besfond s.r.l. directs its activity, as defined in the quality policy, to the satisfaction and protection of its customers by paying attention to the particular needs of customers, working with professionalism and promptness in the response of commercial requests and on the timely examination of complaints, for a full satisfaction of its customers.



### 3.2. Relations with suppliers

In Besfond, relations with suppliers (including collaborators, consultants and agents / representatives) are governed by the rules of this Code and are subject to constant and careful monitoring by the company through the supplier evaluation process. The selection of suppliers and the determination of the purchase conditions are based on an objective assessment of quality, price of goods and services offered, ability to promptly supply and guarantee goods and services of an adequate level based on the needs of the company. Besfond indiscriminately offers suppliers the same opportunities and fair and impartial behaviour.

### 3.3. Relations with employees

Human resources are an indispensable factor for the existence, development and success of any business. For this reason, Besfond s.r.l. protects and promotes the value of human resources in order to improve and increase assets and competitiveness of the skills possessed by each employee in the organizational context of the company.

Specifically, Besfond, through the competent functions, selects, hires, trains, pays and organizes employees (including any temporary workers) on the basis of merit, skills and competencies.

Each employee has the duty to behave honestly and correctly towards Besfond, respecting this Code of Ethics, contractual obligations and carrying out their duties with constant commitment and efficiency. Relations between workers must be based, at every company level, on mutual respect, fairness and education. Besfond condemns any possible discriminatory behaviour based on racial, sexual, political and religious grounds. It is the duty of employees to avoid situations in which conflicts of interest may arise and, if they do, disclose them transparently.

### 3.4. Relations with competitors

Besfond s.r.l. believes in free and fair competition and aligns its actions to obtain competitive results that reward ability, experience and efficiency. Any action aimed at altering the conditions of fair competition is contrary to company policy and is prohibited. In no case the pursuit of the company's interest can justify a conduct of the top management or of the Company's collaborators that is not respectful of the laws in force and compliant with the rules of this Code.

### 3.5. External communications

External communications are based on respect for the right to information. Under no circumstances it is permitted to disclose false or biased info. Each communication activity must be accurate, coordinated and consistent with the principles and policies of the company, it must comply with laws, rules and practices of professional conduct; it must be carried out with clarity and transparency, safeguarding business secrets and confidential information. All contacts with the media must be held exclusively by the members of the Board of Directors.

### 3.6. Relations with Public Administration

In the relationship with the Public Administration (hereinafter also PA) Besfond pays particular attention to every act, behaviour or agreement, to be sure that they are based on maximum transparency, completeness and clarity. Besfond bases its relations with the Supervisory and Control Authorities on maximum collaboration in full compliance with their institutional role, committing itself to promptly execute their prescriptions. In Besfond, relations with the PA and Public Institutions are reserved exclusively to authorized company functions, in compliance with the most rigorous observance of the applicable legal and regulatory provisions and of this Code.



### 3.7. Gifts, giveaways and benefits

Besfond does not accept any form of gift, giveaway or benefit that could be interpreted as exceeding normal commercial or courtesy practices. In particular, any form of gift, giveaway or benefit to public officials or their family members that could affect the independence of judgment or induce them to ensure any advantage is absolutely prohibited. Gifts offered to third parties, in any case not belonging to the PA, given the absolute prohibition indicated above, must be of moderate value and adequately documented to allow for appropriate control and must be reported to the Board of Directors. The recipients of this Code who receive gifts or benefits of value are required to notify the Board of Directors which will assess their adequacy and will notify the sender of the company's policy on the matter.

### 3.8. Treatment of confidential information

Any information and other material relating to Besfond activity, of which the Recipients of this Code become aware or in possession, in relation to their employment or professional relationship, are strictly confidential and exclusive property of the Company. Of particular importance, among confidential information, is information covered by privacy, industrial secrets and materials covered by copyrights or any intellectual propriety right by Besfond or its customers. The company guarantees confidentiality in data processing by adopting appropriate organizational measures defined in accordance with the dictates of the GDPR (General Data Protection Regulation). Even information and / or any other kind of news, documents or data, which are not publicly available and are connected to actions and operations of each task or responsibility, must not be disclosed and used without specific authorization.

### 3.9. Use of company equipment and tools

The company equipment and tools available in Besfond workplaces can only be used for service reasons, in accordance with current legislation and not for personal use. In particular, all the information contained in company IT systems, including e-mail, belongs to Besfond s.r.l. and must be used exclusively for carrying out company activities in the manner and within the limits indicated by the company. Employees / collaborators are required to work diligently in order to protect company assets, using them sparingly and scrupulously and highlighting any improper uses. Each employee is in fact responsible for the protection of the resources entrusted to him and has the duty to promptly inform his direct managers of events potentially harmful to the Company.

### 3.10. Accounting books and records

The Company records all corporate transactions and operations correctly, accurately, transparently and entirely, in order to implement maximum accounting transparency towards stakeholders, third parties and external bodies, and to avoid false, misleading or deceptive entries. Info regarding accounting and annual operating results are disclosed to third parties in accordance with legal obligations. Anyone who becomes aware of falsifications, omissions, alterations to accounting documentation must report to their manager and / or to the Supervisory Body.

## 4. SAFETY AND ENVIRONMENT

### 4.1. Safety

Considering its production activity Besfond is strongly committed to guarantee the best working environment in full compliance with current regulations. It promotes the dissemination of a culture of safety and awareness of the risks associated with its work activities, requiring everyone and at all levels to behave responsibly and in compliance with the corporate procedures adopted in relation to safety.



Besfond s.r.l. is strongly committed to:

- ✓ eliminate or, when not possible, reduce all risks linked to health and safety;
- ✓ identify risks that cannot be avoided and plan an adequate prevention and protection program, as well as control;
- ✓ coordinate and collaborate with the suppliers and with contracting / subcontracting companies for the overall safety of all activities;
- ✓ adapt equipment and workplaces to the relevant legal provisions;
- ✓ provide adequate individual and collective protective equipment to workers;
- ✓ give adequate instructions to workers and periodically provide training updates on health and safety protection;
- ✓ monitor the application of the prevention and protection measures adopted and the behavior of workers, in order to prevent accidents, injuries and occupational diseases;
- ✓ comply with the relevant legal obligations relating to the protection of the health and safety of workers;
- ✓ collaborate only with qualified suppliers

Similarly, workers and collaborators must ensure compliance with the following rules:

- ✓ adopt safe behaviors during work, and operate in compliance with company regulations, procedures, instructions, prevention rules in general and with this Code;
- ✓ avoiding behaviors that are dangerous for oneself and for others;
- ✓ comply with the instructions given by hierarchical superiors or by the Employer;
- ✓ immediately notify superiors of any anomaly, criticality or other dangerous situation that comes to their attention during work;
- ✓ comply with the assigned operational duties and powers;
- ✓ give maximum cooperation to the activities or indications of the Prevention and Protection Service;
- ✓ participate with attention and involvement in the organized training activities;
- ✓ collaborate, with responsible behaviour and in compliance with company rules, in the event of an alarm for an emergency situation;
- ✓ undergo the planned health surveillance;
- ✓ develop full awareness of the implementation of the safety management system adopted by the company;
- ✓ report to the Supervisory Body any situation or criticality that directly or indirectly could constitute a danger to the health and / or safety of workers.

## **4.2. Environment**

Besfond respects the environment as a resource to be protected, for the benefit of the community and future generations. To this end, it plans its activities by seeking a balance between economic initiatives and environmental needs, in compliance with the applicable laws and regulations, providing maximum cooperation to the public authorities responsible for verifying and protecting the environment. Consequently, it is essential that all Recipients of this Code contribute to the process of protecting the environment. In particular, the workplaces, production processes and equipment comply with the highest level of compliance with current environmental



regulations. The Company will promote the use of products that are increasingly compatible with the environment and offset the abandonment of waste. Besfond prohibits any activity that leads to pollution of water, soil and subsoil and is committed to ensuring that plant maintenance and waste management activities are carried out with the utmost respect for the environment. Should potential pollution phenomena be identified, the Company guarantees to intervene promptly to manage the emergency. The Company prohibits any activity that constitutes illegal waste trade and selects only suppliers of environmental services in possession of needed authorization requirements.

## **5. FINAL PROVISIONS**

This Code of Conduct has immediate effect from the date of approval by the Board of Directors and until its review or update. All recipients are required to be adequately aware of it and to observe it.

This Code is displayed on the company bulletin board, published on the company website and physically delivered to all employees.