

Premessa

Metodologia

Informazione
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Organismo
di Vigilanza

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STAM S.P.A.

Via Piave, 6,
31050 Ponzano Veneto (TV)

Code of Ethics

(art. 6, D. Lgs. n. 231/01)

Titolo	Codice Etico		
Emesso da	CDA		
Approvato da	CDA		
Revisione	0	Data revisione	13/12/2023

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1. PURPOSE

Through this Code of Ethics, STAM S.p.A. aims to define and explicitly state the values and principles of conduct that guide its activities and relationships with all parties it interacts with to achieve its corporate objectives, with the goal of preventing irresponsible or illegal behaviour by all those who operate in the name and on behalf of the Company. The Company is committed to ensuring to all those who have relationships with it, whether they are employees, customers, suppliers, or, in general, stakeholders, that business activities will be carried out in full compliance with the law, in a framework of fair competition with honesty, integrity, fairness, and good faith, respecting the legitimate interests of employees, shareholders, customers, and commercial and financial partners. This Code of Ethics constitutes an integral part of the Company's organisation, management, and control model as provided for by Articles 6 and 7 of Legislative Decree No. 231/2001.

2. RECIPIENTS AND GENERAL PROVISIONS

All directors, employees, and collaborators of STAM S.p.A. are required to comply with this Code upon assuming their roles and to conduct themselves according to principles of loyalty, impartiality, integrity, and honesty. The principles contained in the Code also apply to all other parties (individuals or legal entities, organisations, etc.) who, unlike those identified in the previous paragraph, establish working and business relationships with the Company. Recipients of this Code avoid any act or behaviour that violates or could be perceived as violating legal provisions and this Code. Employees and collaborators strive to ensure that relationships with colleagues are harmonious and avoid acts or behaviours that undermine the principle of mutual respect. All directors, employees, and collaborators conduct their activities and use company assets according to criteria of fairness, cost-effectiveness, efficiency, and effectiveness. In relations with external parties, directors, employees, and collaborators behave in such a manner that fosters trust and collaboration from those who come into contact with STAM S.p.A.; they demonstrate courtesy and availability in communication and handle issues efficiently and promptly.

3. PRINCIPLES OF CONDUCT

3.1 Legality, fairness, honesty and integrity

STAM S.p.A. operates in compliance with the laws in force in Italy and, where applicable, with the regulations in force in other countries where it operates, as well as in accordance with professional ethics. The pursuit of the Company's interests can never justify conduct contrary to the principles of legality,

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fairness, honesty, and professionalism. Therefore, any form of benefit, whether received or offered, that could be perceived as a means to influence the independence of judgment and conduct of the parties involved is always rejected. Practices of corruption, illicit favours, collusive behaviours, solicitations, whether direct and/or through third parties, for personal benefits for oneself or others, are prohibited. Acts of commercial courtesy, such as gifts or forms of hospitality, are permitted when they are of modest value and in any case such as not to compromise the integrity or reputation of any of the parties and not to be interpreted, by an impartial observer, as aimed at acquiring improper advantages. Directors, employees, and collaborators do not use their office or any company space to pursue private and personal goals or to achieve private benefits. Directors, employees, and collaborators do not use their position to obtain advantages or benefits in internal and external relationships, even of a private nature. Directors, employees, and collaborators do not use non-public information or information not made public, obtained even confidentially in the course of their duties, to achieve profits or private interests. Directors, employees, and collaborators avoid obtaining any kind of benefit that may or appear to influence their independence of judgment and impartiality; they also do not accept gifts or other benefits for themselves or others from external parties wishing to establish a relationship with the company, except for gifts of modest value. Directors, employees, and collaborators operate impartially, avoiding favoritism or unequal treatment; they refrain from exerting undue pressure and reject it, take initiatives and make decisions with the utmost transparency, and avoid creating or taking advantage of privileged situations. Directors, employees, and collaborators do not make commitments or personal promises that could affect the performance of their duties.

3.2 Loyalty and Good Faith

Relations with the recipients of the Model and with third parties in general must be based on good faith and honesty, to be implemented with behaviours that are reliable in terms of the sustainability of agreements, fulfillment of agreements and promises, enhancement of company assets, and the pursuit of good faith behaviour in every decision.

3.3 Conflict of interest and impartiality

In carrying out its activities, STAM S.p.A. avoids situations of real or even potential conflict of interest that may interfere with the ability to make impartial decisions in the best interest of the Company and in full compliance with the provisions of the Code. Examples of situations that create conflicts of interest include:

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- Economic and financial interests of the director, employee, and/or their families in activities of suppliers, customers, and competitors;
- Use of one's position in the company or information acquired in one's work in a way that creates a conflict between personal interests and corporate interests;
- Engaging in any type of work activity with clients, suppliers, or competitors;
- Accepting money, favors, or benefits from individuals or companies that are or intend to do business with the Company;
- Holding positions of decision-making responsibility both within the Company and in non-profit organisations that receive grants or funding from the Company.

Directors, employees, and collaborators must immediately inform the Company of any interests, including economic ones, that they, their spouse, first-degree relatives, or cohabitants may have in the activities or decisions within their purview. Directors, employees, and collaborators must abstain from participating in activities or decisions that create such a conflict and must provide the Company with any additional information requested.

3.4 Free competition

STAM S.p.A. recognizes fair and free competition as a key factor for growth and continuous improvement. The Company refrains from behaviours contrary to this principle, including collusive, predatory, and/or abusive practices of dominant positions.

3.5 Fairness and equality

In its relationships with all parties, STAM S.p.A. avoids any form of discrimination based on age, racial and ethnic origin, nationality, political opinions, religious beliefs, gender, sexuality, or health status of its counterparts.

3.6 Professionalism and enhancement of resources

STAM S.p.A. ensures an adequate level of professionalism in the execution of tasks assigned to its employees and collaborators. The enhancement of human resources and respect for their autonomy are fundamental principles for the Company, which will provide suitable tools and programs for professional development, training, and growth aimed at enhancing specific skills and preserving and increasing the expertise acquired during the collaboration.

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3.7 Protection of workers' health and safety

STAM S.p.A. guarantees decent working conditions and safe and healthy working environments to its employees and collaborators, regardless of the type of contractual relationship. Specifically, the Company:

- Prioritises compliance with legislation and agreements applicable to worker safety and health;
- Considers the management of worker safety and health as an integral part of the overall management of the organisation;
- Promotes the involvement, cooperation, and collaboration of all company resources regarding worker safety and health;
- Ensures the necessary resources for the proper management of safety and health issues at work.

3.8 Environmental protection

STAM S.p.A. is committed to safeguarding the environment. It directs its choices to ensure the compatibility between its economic initiatives and environmental needs, in compliance with current regulations. The objectives pursued include energy savings, avoiding waste of energy and natural resources. In full respect of the environment, no waste of any kind should be left in the company premises, both inside and outside the buildings. It is the precise duty of all directors, employees, and collaborators to actively maintain order and cleanliness in the workplace.

3.9 Safeguarding the company image

All directors, employees, and collaborators commit to safeguarding the company image by behaving in ways that ensure the utmost respect for individuals and the environment in which they operate and live. The behaviour at the workplace must be appropriate to it. Behaviours that can directly or indirectly disturb those engaged in work activities within the company premises, especially in the presence of guests, should be avoided. In full respect of common areas, it is prohibited to post non-work-related posters or documents that may offend others' sensitivity. It is the precise duty of all directors, employees, and collaborators to avoid loud noises or heated tones and to dress appropriately.

3.10 Use of the Company's Intellectual and Material Assets

The use of the company's intellectual and material assets, including IT tools, must comply with general regulations and their intended use, protecting their preservation and functionality, and avoiding their use in violation of any legal provisions.

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4. GUIDELINES IN RELATIONS WITH COUNTERPARTIES

4.1 Relations with Customers and the Market

STAM S.p.A. believes in free and fair competition and bases its actions on achieving competitive results that reward capability, experience, and efficiency. Any action aimed at altering conditions of fair competition is contrary to STAM S.p.A.'s policy and is prohibited for anyone acting on its behalf. In no case can the pursuit of the Company's interest justify behavior by its executives or collaborators that is not respectful of current laws and compliant with the rules of this Code of Ethics.

STAM S.p.A. directs its activities to the satisfaction and protection of its customers, paying attention to requests that may improve the quality of the products and services offered. The information and documentation provided to its customers, both current and potential, about the products and services offered, as well as STAM S.p.A.'s experiences and references, are truthful, accurate, and comprehensive so that customers can make informed decisions. Negotiations conducted directly by STAM S.p.A. personnel or through its commercial network, contractual relationships, and communications of the Company are inspired by principles of ethics, honesty, professionalism, transparency, and in any case, are based on maximum collaboration.

STAM S.p.A. is committed to respecting the right of its customers not to receive products harmful to the health and physical integrity of people and the environment and to have complete information about them. The respect of these principles is required of all those who provide and/or promote and/or sell goods and/or services on behalf of STAM S.p.a., and in general, anyone who represents it.

4.2 Relations with Partners and Suppliers

Partners and suppliers of STAM S.p.A. enable the concrete realisation of business activities with their collaboration. The Company commits to:

- Developing fair and cooperative relationships with partners and suppliers based on communication that allows for the mutual exchange of expertise and information and that promotes the creation of shared value;
- Ensuring that every company meeting the required criteria can compete for a supply, adopting objective evaluation criteria in the selection, according to declared and transparent methods;
- Observing the contractually agreed conditions.

4.3 Relations with Collaborators

STAM S.p.A. recognises the importance of its employees and collaborators as one of the fundamental factors for achieving corporate goals and adopts procedures and methods of selection, development, evaluation, and training aimed at ensuring maximum fairness and equal opportunities without discrimination based on gender, race, age, sexual orientation, religious beliefs, and any other factor. People are recruited based on their experience, aptitude, and competence. Recruitment is based solely on the match between expected profiles and required profiles.

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The Company is committed to offering all its collaborators the same opportunities, ensuring that everyone can enjoy fair treatment based on strictly professional merit criteria for any decision related to professional life, without any discrimination. STAM S.p.A. manages activities in compliance with the applicable regulations regarding workplace conditions, striving to build a dignified and respectful environment for all.

The Company is committed to spreading and consolidating a culture of safety by developing awareness of risks and knowledge and compliance with current prevention and protection regulations, promoting responsible behaviour by all workers. STAM S.p.A. expects all personnel to cooperate in maintaining a company climate based on respect for individual dignity, honour, and reputation, and intervenes to prevent abusive or defamatory interpersonal behaviour.

4.4 Relations with Public Administration and Other External Parties

STAM S.p.A., through its people and structures, actively and fully cooperates with the Authorities. All relations with Authorities and Public Administration are based on principles of fairness, transparency, cooperation, and non-interference, respecting mutual roles and company procedures. It is prohibited to make, induce, or encourage false statements to Authorities. STAM S.p.A. does not support demonstrations or initiatives with an exclusively or predominantly political purpose and refrains from any direct or indirect pressure on politically exposed people.

5. PROTECTION OF INTELLECTUAL ASSETS AND CORPORATE KNOWLEDGE

All information related to the design and production systems employed by the Company, the services provided, and the corporate know-how constitutes an economic asset to be protected. Therefore, STAM S.p.A. aims to effectively protect its know-how by utilising all legal protection tools and adopting appropriate measures and procedures to ensure the confidentiality of corporate information with the objective to:

- Limit the dissemination of confidential information to those who need it due to the nature of their duties;
- Minimise the risk of such information being misused or disclosed outside the Company without specific authorisation.

5.1 Confidential information

All technical and/or commercial information, even if not specifically marked as "confidential" or "secret" and similar, which employees and collaborators become aware of during and because of their employment or collaboration relationship, have economic significance for the Company.

Confidential information includes, but is not limited to, all information, data, results, processes, procedures, and other elements concerning:

- The design or development of products;

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- The products themselves and/or the production processes applied (patented and non-patented, owned and/or available to the Company);
- Corporate processes and organisation;
- Commercial information and policies;
- The management and economic-financial performance of the Company;
- The Company's relationships with third parties.

Additionally, all results from research, inventiveness, and product development activities conducted directly within the Company or commissioned to third parties must be considered confidential information. Such information can be acquired by personnel in any form (written, verbal, electronic, direct vision, or any other intelligible form) as a consequence and effect of the employment or collaboration relationship.

5.2 Use of confidential information

The Company's directors, employees, and collaborators are required to ensure the confidentiality of confidential information and to use it exclusively for performing their duties. In no case may they use it for other purposes.

Employees and collaborators are prohibited from revealing, transferring, and/or communicating, even partially, such information to third parties (companies, entities, or individuals) or reproducing, copying, and/or duplicating documents (including electronic ones) containing confidential information or parts thereof, without the prior written consent of the management and/or their respective supervisors.

Employees and collaborators must handle removable magnetic media (disks, rewritable CDs and DVDs, USB drives, etc.) that may contain corporate know-how with particular care to avoid the theft, alteration, and/or destruction of their content or its recovery after deletion.

The obligation of confidentiality and the consequent prohibitions mentioned above bind personnel both during the employment relationship and after its termination.

5.3 Management of Information from Third Parties

All technical, commercial, and/or administrative information from third parties used by the Company within the scope of contractual relationships established with them, even if not specifically marked as "confidential" or "secret" and similar, remains the exclusive property of these third parties. These must also be kept fully confidential as they constitute corporate know-how owned by others, protected by law. Therefore, the same rules provided for corporate know-how and the prohibition of unauthorised direct or indirect disclosure or use apply to such information.

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6. SOCIAL COMMUNICATIONS AND PROTECTION OF THE COMPANY'S ASSETS

STAM S.P.A. ensures the maintenance of accounting records, the training and drafting of the annual balance sheet, reports, general social communications, and anything else required, in compliance with legal provisions, international principles, and prevailing technical standards.

STAM S.P.A. promotes accurate and timely information to all relevant bodies and functions regarding the preparation of the annual balance sheet, reports, general social communications, and anything else required for its operation. It also ensures proper collaboration between corporate bodies and functions and encourages inspections by the competent authorities.

Everyone is required to comply with the rules aimed at protecting the integrity and effectiveness of the company's capital, in order not to undermine the guarantees of creditors and third parties in general.

7. TAX COMPLIANCE

The Company is committed to fulfilling all its tax obligations comprehensively and transparently, as mandated by current regulations, and to cooperating with tax authorities when required. Tax declarations and the payment of taxes are not only legal obligations but also essential elements of the company's social responsibility.

Compliance with VAT regulations on intra-community supplies, ensuring non-taxability of supplies to taxable persons in other member states and application of the principle of taxation in the destination country, is consistently maintained. Customs regulations concerning border duties (duties, customs taxes, etc.) are also strictly observed.

Recipients of this Code must not, in any way, commit or assist others in committing criminal violations of tax laws and customs regulations.

8. REPORTING VIOLATIONS OF THE ETHICAL CODE PROVISIONS

Any suspected violation of the provisions of this Ethical Code by one or more Recipients can be reported without delay by any Recipient, provided that the report is made in good faith and is well-founded or based on reasonable grounds.

STAM S.p.A., following the procedure described on its website, allows both internal and external Stakeholders to report any actions contrary to the Ethical Code and principles of loyalty, fairness, and integrity, as well as violations of national and European Union regulations that harm public interest or the integrity of public administration or the private entity, as referenced by applicable law.

Reports will be managed promptly and through the predefined process detailed in the procedure on the company's website. The Company is committed to maintaining

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the confidentiality of the whistleblower's identity, subject to legal obligations and the protection of the rights of STAM S.p.A. or those wrongly and/or maliciously accused.

STAM S.p.A. protects the whistleblower acting in good faith and other deserving subjects from any form of retaliation, discrimination, and/or penalisation. If such behaviours are found, STAM S.p.A. will take appropriate action. Similarly, the Company will take measures against anyone who knowingly makes false, unfounded, or pretextual reports according to applicable laws.

9. SANCTIONS

The Company, particularly its directors and managers, is committed to ensuring that the commitments expressed in the Ethical Code are implemented. Violations of the Ethical Code are subject to sanctions proportional to the severity and based on the type of relationship the involved Recipient has with STAM S.p.A.

Sanctions include the termination of the fiduciary relationship with the Company, along with the contractual consequences provided for and permitted by current regulations. Any disciplinary measures against employees for violations of the Ethical Code will be taken in accordance with applicable laws.

For other collaborators, suppliers, and partners, the Company reserves the right to terminate the contract or apply other contractual actions, as stipulated in specific clauses for this purpose. The directors evaluate the adequacy of this Ethical Code in relation to business evolution or major applicable regulations.

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