



## CORPORATE CODE OF ETHICS



## THE COMPANY



Colmec S.p.A. is an Italian company, founded in 1973 and is a world leader in the mechanical design and manufacturing of lines for the extrusion and mixing of rubber and silicone compounds with high technological content.

The constant research, the attention to the specific needs of the customer, the innovative proposals, the continuous control of the production process are the main assets on which Colmec has constructed its image and by which has achieved the full trust of its customers.

To ensure this approach, Colmec has always established high moral values and principles, including [equality and protection of diversity](#), [protection of the person](#), [competence and valuing personal confidentiality](#), [transparency](#), [integrity](#), [quality](#), [health and safety](#), [environmental protection and sustainability](#).

## PURPOSE AND GOAL



Our Code of Ethics has the goal to synthesize all of the positive principals and the shared rules of behaviour on which the Identity and the Culture of the Company are founded:

- explicit values and ethical principles which lead the business activities, the relationships with customers, suppliers, employees, collaborators, public institutions, citizens and every other **subject/person** involved in the company's activities
- formalize the commitment to act on the basis of the following values and ethical principals: *equality and protection of diversity, protection of the person and equity, competence and valuing people, confidentiality, transparency, integrity, quality, health and safety, environmental protection and sustainability.*
- points out the principles of behaviour, the values and the responsibilities which are required by **the employees and the collaborators** during work performance

## RECIPIENTS



The provisions of the Code of Ethics apply to all employees, regardless of the contractual status, collaborators and external consultants of Colmec, as well as all those who in various capacities, directly or indirectly, permanently or temporarily, establish relations on various levels with the company or act in the name or on behalf of it.

All the stakeholders of the company are required to know and apply the provisions and respect them carefully, refraining from contrary conduct.

We do not justify any action of any stakeholders or whoever is involved in Colmec's activities, which is not aligned to the principles of the Code of Ethics.



### **Integrity**

Colmec supports the values of correctness, loyalty and fairness in the behaviour and the relations both inside and outside the company. The Company condemns any bribery activity as a possible tool for conducting business.

The company considers its reputation a precious asset, which constantly depends on the way each of its members act and it is therefore necessary to avoid any action that could compromise it

### **Confidentiality**

Colmec ensures the use of personal data is limited to its activity and works to avoid improper or illicit use of them.

### **Quality**

Colmec is a bearer of innovation, capable of exceeding the highest expectations, of building reliable products and of providing high quality services with a focus on full customer satisfaction.

For this purpose, Colmec is certified in accordance with the requirements of *ISO 9001:2015 standard - Quality management system*.

### **Health and safety protection**

Colmec ensures compliance with mandatory regulations by ensuring legislative compliance in the field of health and safety to promote the creation of a healthy and safe working environment. All company workers must be trained and informed about the legislation and must comply with the rules in reference to the required prevention procedures.

The continuous improvement of safety in the working processes is pursued by analysing reports from department staff and near-miss records in order to introduce specific corrective actions if necessary.

To ensure its commitment, Colmec has got the certification in accordance with the requirements of *ISO 45001:2018 standard - Occupational health and safety management system*

### **Environmental protection and Sustainability**

Colmec pays close attention to environmental protection and energy efficiency, developing awareness of risks and promoting responsible behaviour through the reduction of the use of dangerous substances, the careful management of waste, and favouring the containment of polluting emissions.

The Company is committed to reducing its environmental footprint by implementing measures to prevent, monitor and control the impacts of its activities.

Colmec is certified according to the requirements of *ISO 14001:2015 standard - Environmental management system*.



## RULES OF CONDUCT



Below are listed the corporate rules of conduct to which each member of the Company must refer to in order to correctly fulfill and pursue the values and general principles set out in this Code of Ethics.

The *criteria of conduct* have been drafted, defining specific rules of conduct regarding:

- Management of business and corporate activities
- Management of Company members
- Dissemination and management of information

### Management of business activities.

In the everyday management of its activities, Colmec ensures compliance with the principles of behavior identified in this Code of Ethics.

#### **Relations with suppliers**

The selection of suppliers is carried out on the basis of criteria that carefully evaluate the quality standards, organization, capacity to perform the required activities, sense of responsibility, flexibility, practices relating to the workforce and financial solidity, ethics and attention to health, safety and the environment. Suppliers are an added value for the Company and for this reason it is always necessary to check their characteristics in order to establish relationships of trust that can last over time

Colmec, to guarantee customer's quality and reliability, adopts specific criteria so that:

- the assignment of orders respects objective criteria
- the relationship with suppliers is frank, transparent and collaborative
- the supplier's performance is objectively evaluated on a periodic basis

The Company asks its suppliers, in turn, to ensure that these principles are also implemented by their employees, subcontractors and third parties with whom they work, in order to ensure ethics and transparency throughout the supply chain.

Colmec undertakes not to initiate forms of collaboration with anyone who does not accept these conditions which are formalized in the "*Supplier Code of Conduct*".

#### **Relation with customers**

Colmec is committed to maintaining relationships of trust with customers, providing clear and complete information on products, guaranteeing high quality standards, with a constant attention to progress.

The Company undertakes to comply with the defined contractual agreements, actively participating in the solution of problems, providing effective assistance and guaranteeing maximum confidentiality, flexibility, precision and punctuality.

### **Relations with the public administration**

Colmec interacts with the Public Administrations and Public Institutions by observing maximum transparency and clarity in communications and in its own behavior, in absolute and rigorous compliance with the laws, regulations in force and the principles established in the Code of Ethics, so as not to compromise the integrity and the reputation of both parties.

To this end, the undertaking of commitments with the Public Administrations and Public Institutions is reserved exclusively to the responsible and authorized functions.

### **Relations with the local community**

The Company acts in respect of the community and the local territory, safeguarding the landscape and the ecosystem, committing itself to the adoption of measures to prevent and reduce the environmental impact. Colmec supports local organizations and associations and promotes charitable and cultural activities and events in the area.

## **Management of Company members**

Colmec enhances the talents and skills of each employee, investing in their skills and potential.

The Company rejects any form of discrimination against its employees and collaborators and believes in the importance of teamwork, respecting diversity and protecting the rights of each member to obtain excellent and shared results.

It is essential to guarantee safe and healthy working environments, in compliance with the law and above all with the needs of the staff.

The choice of personnel is always based solely on criteria of merit and competence.

Employees and collaborators are required to:

- refrain from conduct contrary to the rules contained in the Code;
- contact the company representatives in the event of a request for clarification on how to apply the Code;
- promptly report to the company representatives any news, directly detected or reported by others, regarding possible violations thereof and any request made to them in order to violate it;
- collaborate with the functions in charge of verifying possible violations;
- adopt the appropriate internal and, if within its competence, external initiatives in the event of failure by third parties to comply with the provisions of the Code.

## **Communication and information management**

In the dissemination of information, Colmec respects the laws, rules, practices of professional conduct ensuring clarity, transparency and timeliness. The topic was developed in a specific document called "Regulation on data management".



### Corporate communications

Colmec undertakes to disclose corporate information through the officially appointed functions, adhering to the guiding principles of truth, correctness, transparency and prudence, promoting awareness of corporate policies and the Company's programs and projects.

### Accounting records

Colmec guarantees that the financial statements, reports and corporate communications are drawn up with integrity, in compliance with the law and accounting standards, in order to represent the Company's equity and financial situation correctly and truthfully

To this end, it adopts administrative-accounting systems capable of correctly representing management events and providing the tools to identify, prevent and manage, as far as possible, financial and operational risks, as well as fraud against the Company

### Confidential information and privacy

Colmec considers confidential and private all information concerning company documents, information and data of employees, customers and business partners and consequently these are not used or communicated except to / by authorized persons and in any case cannot be disclosed, used or employed outside the corporate activities unless in compliance with current legislation, with the principles of correctness, completeness, adequacy, timeliness and non-selectivity and with the applicable corporate procedures.

To this end, the Company is committed to:

- maintain an adequate level of security in the selection and use of its information technology systems
- expressly prohibit the use and dissemination of information that is not in the public domain
- protect the confidentiality of information it may have received from third parties
- strictly comply with the laws and regulations on insider trading in force in the jurisdiction concerned, in compliance with internal procedures and regulations

Furthermore, all personal data is processed in compliance with all applicable privacy laws and regulations.

### Social media

Colmec urges its members to use social media correctly and responsibly, both at work (only for communications on the company's official pages) and in private life, to ensure the protection of the Company's image and reputation

## IMPLEMENTATION AND DISSEMINATION



Colmec gives visibility to the Code of Ethics by providing a copy to staff and making it available on the website [www.colmec.it](http://www.colmec.it) to facilitate consultation by all parties outside the company. A copy of the "*Supplier Code of Conduct*" is also attached to the contracts for the supply of goods and services, as an integral part of the contractual obligations.

Compliance with the provisions in the Code of Ethics is considered an integral part of the contractual obligations of employees and collaborators. Recipients who become aware of violations of the Code of Ethics are required to notify the company representatives who will take the necessary measures. The measures deemed appropriate will be taken against the perpetrators of unlawful conduct.

Employees can contact the company representatives in case of specific requests or to report incorrect behavior or behavior not in line with the corporate culture by other employees or other people involved in the company; Colmec undertakes to monitor and listen to all the problems raised and to seek suitable solutions.

This Code enters into force in **May 2023** with **revision index 00** and is periodically reviewed and updated.