



CODE OF ETHICS



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PART I - IMPLEMENTATION METHODS

ARTICLE 1 RANGE OF APPLICATION

The Code of Ethics was drawn up to identify the basic ethical values underpinning ITALCARRELLI S.p.A. It constitutes a set of guidelines to inform the conduct of all Shareholders and Employees in carrying out their work, both with respect to internal and external relations.

The rules contained in the Code of Ethics apply to all Shareholders and Employees of ITALCARRELLI, each of whom is called upon to contribute actively to its implementation and report any breaches.

ITALCARRELLI undertakes to promote awareness of the Code of Ethics and enforce compliance with the rules of conduct contained therein.


ARTICLE 2 DISTRIBUTION

The Code of Ethics can be readily consulted by all Shareholders and Employees through its publication on the online notice board and through any other methods deemed most appropriate at the time. It is also made known to all Customers and Suppliers through disclosure on its Website.

In order to ensure its continuous improvement, ITALCARRELLI is committed to examining the Code of Ethics in depth and updating it to adapt it to evolving civil awareness and current practices.

ARTICLE 3 DOUBTS IN INTERPRETATION

If there are any doubts regarding the application of the rules of the Code of Ethics, the Shareholders and Employees of ITALCARRELLI should contact the Human Resources Department to obtain clarification on what conduct to adopt.

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PART II - VALUES AND PRINCIPLES OF ITALCARRELLI

ARTICLE 4 LEGALITY AND HONESTY

All people who work for ITALCARRELLI are obliged to behave in accordance with the laws and regulations in force in the country where they are employed.

Acting in accordance with the law and with the highest levels of honesty enables ITALCARRELLI to maintain its reputation worldwide.

The correct application of the regulations in force assumes an adequate understanding of them. For this reason, ITALCARRELLI requests all its Shareholders and Employees to contact the Human Resources Department to clarify any doubts about the conduct to be adopted.

ARTICLE 5 CONFIDENTIALITY

The Shareholders and Employees of ITALCARRELLI shall ensure that all information, facts and documents of a technical, technological, commercial or financial nature that come to their attention during the course of their work are kept confidential concerning both the Company and its Customers.

More specifically, the following is forbidden:

- disclosing information and/or files related to production activities;
- photographing or filming drawings, production processes or equipment.


The disclosure of confidential and/or privileged information may constitute a civil, criminal or disciplinary offence and may be prosecuted accordingly.

ARTICLE 6 HEALTH AND SAFETY

ITALCARRELLI ensures a safe and productive working environment for all Employees, with particular attention to hygiene and workplace conditions.

The Company promotes and disseminates a culture of safety in terms of accident prevention and protection and calls on all Shareholders and Employees to comply with the regulations on prevention and safety in the workplace.

The internal managers in charge of and responsible for ensuring compliance with the application of safety regulations are also in charge of ensuring the application of said regulations and are required to

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immediately report any shortfalls or failures in the safety of plant and equipment that they become aware of to the Employer.

ARTICLE 7
SUSTAINABLE DEVELOPMENT AND RESPECT FOR THE ENVIRONMENT

ITALCARRELLI considers environmental protection to be of fundamental importance to the community, and is therefore committed to complying with the provisions of current regulations and continuously improving the environmental performance of its activities.

Through environmentally friendly choices such as energy saving, separate waste management, reduction of polluting factors and adoption of eco-efficient technologies, ITALCARRELLI aims to contribute to the distribution and awareness-raising of sustainable development.

ARTICLE 8
FAIR COMPETITION

ITALCARRELLI recognises the fundamental value of a competitive market.

In the running of its business, ITALCARRELLI undertakes to conduct business dealings that are in keeping with fair competition, behaving in a transparent and traceable manner and without falsifying data, documents or other information aimed at gaining an advantage over competitors. ITALCARRELLI also undertakes not to knowingly infringe the intellectual property rights of third parties.


ARTICLE 9
QUALITY ORIENTED

ITALCARRELLI is committed to ensuring high quality standards for its products and services and periodically monitoring the quality perceived by customers.

The main objective of ITALCARRELLI is to supply state-of-the-art, technologically advanced vehicles which is why it constantly invests in research into innovative solutions.

ARTICLE 10
IMPARTIALITY AND EQUAL OPPORTUNITIES

In internal and external relations, ITALCARRELLI does not permit discriminatory behaviour based on age, gender, sexuality, health status, race, religious beliefs or political and trade union opinions.

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ITALCARRELLI values diversity as an opportunity for growth and encourages the exchange of ideas and experiences.

The management of employees as well as professional development are based on the principle of equal opportunities. The essential criteria for career and salary promotion include the recognition of efficient work organisation, results achieved and the skills gained.


ARTICLE 11 WORK-LIFE BALANCE

ITALCARRELLI is aware of the importance of reconciling the professional and private spheres in a conciliatory manner.

With this in mind, the Company undertakes to adopt, compatibly with the specific organisation of work, flexible time solutions and to support Shareholders and Employees in the event of personal or family difficulties in the manner agreed with as the situation arises.

ARTICLE 12 PLACING VALUE ON TALENT

ITALCARRELLI believes in the potential of its Shareholders and Employees, and is therefore committed to supporting their professional growth by providing them with training tools that allow them to develop new skills and enrich their professional and human expertise.

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PART III - RULES OF CONDUCT

ARTICLE 13 USE OF COMPANY ASSETS

The proper conduct to employ in the use of company assets is specifically governed in the Internal Company Regulations of 01.05.2022, to which reference should be made.

Please note that the use of company assets must be strictly related to the performance of work. Any use of company property of a personal nature must be authorised in advance by Company Management. Each Shareholder and Employee is required to act with care and diligence in order to protect the resources entrusted to him/her. All necessary measures must be taken to prevent the theft, damage or loss of company property.

ARTICLE 14 INTERNET AND E-MAIL USE

ITALCARRELLI would like to remind all Shareholders and Employees of the importance of following the correct procedures when using the Internet and e-mails to ensure the IT security of company devices. Behaviour in accordance with company procedures makes it possible to avoid exposure of the company to external attacks and to preserve confidential information, facts and internal documents.


ARTICLE 15 ACCURACY OF ACCOUNTING RECORDS

In order to ensure a reliable administrative and accounting system and the correct representation of the economic, asset and financial situation of ITALCARRELLI, accounting records must be based on the principles of maximum transparency and verifiability.

Adequate documentary support shall be provided for each transaction to facilitate any checking. Every transaction must be properly recorded and authorised.

The personnel dealing with external consultants are required to provide truthful information. The same transparency and fairness is required of those who have consultancy relationships with the company.

The annual financial statements and accompanying reports are drawn up in accordance with the principle of completeness and accuracy, in compliance with the provisions of the Civil Code and applicable laws.

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ARTICLE 16
HARASSMENT IN THE WORKPLACE

ITALCARRELLI ensures working conditions that respect human dignity. Respect for workers entails the duty to refrain from their harassment, with this being understood as follows:

- intimidation, humiliation, threats, insults, discrimination or other behaviour isolating individuals or groups of workers;
- unjustified interference in the work performance of others;
- any unwanted actions or behaviour with sexual connotations, whether in physical, verbal or non-verbal form, which causes damage to personal dignity and freedom and causes an intimidating, hostile, degrading, humiliating or offensive atmosphere.

A Shareholder or Employee who believes he or she has been subject to harassment as defined above may report the incident to the Human Resources Department, which will carefully examine the actual breach of this Code.

ARTICLE 17
LISTENING AND DIALOGUE


ITALCARRELLI considers listening and dialogue to be key elements in the fostering of a pro-active and stimulating working environment. Therefore, the Company undertakes to:

- foster the sharing of experiences, values, strategies and objectives;
- encourage respectful discussion and open communication between all Shareholders and Employees;
- listen to requests that could enable improvement in the quality of the products and services offered;
- promote opportunities for discussion between the different areas of the Company;
- pay attention to the needs of Shareholders and Employees.

Effective internal communication is also a primary and direct responsibility of each manager in managing interpersonal relations with his/her Associates.

ARTICLE 18
CUSTOMER RELATIONS

Relations with customers must be based on the principles of loyalty, transparency and professionalism. All Shareholders and Employees of ITALCARRELLI are required to treat Customers with helpfulness, respect and courtesy and understand their needs and expectations in order to establish collaborative and trusting relationships.

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ARTICLE 19
RELATIONS WITH SUPPLIERS

Relations with suppliers of ITALCARRELLI are based on the principles of legality, fairness and transparency.

The selection and retention of Suppliers is based on objective and impartial criteria in terms of quality, cost, products offered and timeliness. In order to avoid potential conflict of interest situations, Shareholders and Employees are required to refuse gifts, presents and the like unless they can be easily considered to involve normal courteous relations and are of modest value.

ARTICLE 20
BOARD OF DIRECTORS

The Board of Directors, in pursuing the interests of the Shareholders, undertakes to manage ITALCARRELLI according to the principles of legality, fairness and transparency.

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PART IV - BREACH OF THE PROVISIONS OF THE CODE OF ETHICS

ARTICLE 21 REPORTING BREACHES

The Shareholders and Employees of ITALCARRELLI are required to report any behaviour that is even potentially in conflict with this Code of Ethics to the Human Resources Department.

Reports may also be submitted in writing to the e-mail address hr@italcarrelli.eu. To the extent permitted by law, the confidentiality of the reporting party is guaranteed.

The Human Resources Department will assess, on a case-by-case basis, whether to initiate disciplinary proceedings following a thorough investigation of the concrete circumstances of the breach, while guaranteeing the anonymity of the reporting party.

The person who reported the breach is strictly forbidden from conducting preliminary investigations on his or her own.

Retaliation of any kind against anyone making a report will not be tolerated.

ARTICLE 22 CONSEQUENCES OF BREACHES

The breach of the provisions contained in the Code of Ethics may break the relationship of trust between ITALCARRELLI and the person responsible for the breach. A proven breach of any of the provisions may result in the sanctions provided for by law and by the metalworker industry national collective labour contract.

Revision	Date	Author	Verified	Main Revision Changes
00	28/02/2023	Bordignon F.	Lambertucci I.	-
01	22/05/2024	Bordignon F.	Lambertucci I.	Cover and header update