



CODE OF ETHICS

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SCIC SPA - Via Cremonese 135/a, 43126 Parma (Italia) - amministrazione@pec.scic.it P.IVA 02801370343- SDI RR66BDG
Capitale Sociale i.v. EURO 1.502.600 Iscrizione registro imprese di Parma 02801370343 – Numero R.E.A. PR268033

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FOREWORD

Innovation, functionality, attention to the environment and social responsibility are values that have distinguished SCIC S.p.A. for more than 70 years.

The business over the years is growing more and more and given our operations in different contexts we must clearly define and regulate the values in which we recognize ourselves, to do so we have created the present "Code of Ethics".

1. INTRODUCTION

1.1 WHAT IS ETHICS?

"Ethics" is the set of rules of conduct followed by individuals or a group of people. It is an abstract concept, but it concerns the daily and translates into norms of behavior, values and moral principles.

1.2 CORPORATE ETHICS

If the reflection on ethics moves to the concept of business, the concept of responsibility and awareness, which is an indispensable condition for success, is linked to that of social responsibility of enterprise, which for SCIC S.p.A. is the ability to integrate its business activities with respect and protection of the interests of all partners and subjects with whom it relates.

1.3 CODE OF ETHICS

The Code of Ethics is the set of "ethical principles", that is, the rights, duties and responsibilities towards employees, customers, suppliers and all stakeholders of SCIC S.p.A.

The main objective is to spread the values in which the company recognizes itself, regulate the principles of behavior, making sure that the well-being and respect of all are always taken into account. All in full compliance with the laws in force and the national collective labour agreement applied.

1.4 SCOPE OF THE CODE OF ETHICS

This Code of Ethics applies to all those who directly or indirectly, permanently or temporarily work in the interest of the company and therefore, in addition to people working in the company (from the top) according to the company's organizational chart, to its customers and suppliers. All are obliged to protect and preserve, through their own behaviour, the respectability and image of society, the integrity of its economic, social and human heritage.

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Compliance with the principles and rules expressed in this Code of Ethics is monitored through corporate policies, protocols and procedures.

1.5 SHARING OF THE CODE OF ETHICS

This Code of Ethics has been defined and approved by the Board of Directors of SCIC S.p.A and, where necessary, will be updated periodically and, if necessary, promptly disseminated to the recipients. It is shared with the recipients using all communication methods (corporate website; email communications) and opportunities (employee training) as well as being posted in the company's locations, in a place accessible to all.

2. ETHICAL PRINCIPLES

2.1 FAIRNESS AND HONESTY

Fairness and honesty are some of the fundamental principles for all activities of SCIC S.p.A., therefore the company acts respecting the laws in force and professional ethics, contrasting with the measures deemed most appropriate the conduct that goes against these principles.

2.2 SOCIAL RESPONSIBILITY

SCIC S.p.A., in carrying out its economic activity, adopts a socially responsible behavior, respects and safeguards human rights and the well-being of the community. Monitors and responds to the economic, environmental and social expectations of all stakeholders.

2.3 HUMAN RIGHTS

SCIC S.p.A. recognizes the importance of human capital, which makes a fundamental contribution to the company's development every day and, therefore, undertakes not to violate its fundamental rights.

In particular, SCIC S.p.A. is concerned to ensure its employees and collaborators a serene working environment by avoiding and combating any form of harassment or bullying. It also avoids any discrimination, thus guaranteeing equal opportunities, based on nationality, sex, race or ethnic origin, social, religion, political opinions, age, sexual orientation, disability, marital status, Health status and guarantees respect for the universally recognized human rights enshrined in the Universal Declaration of Human Rights and the ILO guidelines.

At the same time SCIC S.p.A. ensures that its suppliers and customers act with equal respect.

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2.4 CHILD LABOUR

SCIC S.p.A. undertakes not to use or in any way promote child labour in full compliance with the provisions of Italian law on the protection of minors.

In addition, it verifies its suppliers, so that they also operate in accordance with the provisions of Italian law, under penalty of definitive exclusion from the list of suppliers.

2.5 WORK ENVIRONMENT

The relations of SCIC S.p.A. with its employees and collaborators are established in accordance with the principles of fairness, non-discrimination and respect for the dignity of the person. In particular, SCIC S.p.A. is committed to promoting a corporate culture based on mutual respect and the enhancement of diversity and to creating a working environment in which everyone, regardless of their personal characteristics, feel valued and can fully express their potential. Equal opportunities between the sexes are recognised by guaranteeing equality of treatment and equality in evaluation processes, for all based on merit and competence criteria in relation to the function performed and the results achieved.

Any form of violence, physical or psychological, as well as any form of coercion or harassment and behavior that is, even in the abstract, attributable to the cases of bullying or bullying or that, however, ingeneri discomfort or fear.

SCIC S.p.A. undertakes to scrupulously respect all the regulations in force concerning working hours, guaranteeing to all employees the right to rest and to work-life balance.

The company undertakes to constantly monitor compliance with these regulations and to take prompt action in case of any violations.

SCIC S.p.A. firmly rejects any form of forced labour and/or child labour and, in any case, illegal work and/or exploitation. It respects the rights and freedoms of its employees, while encouraging dialogue and constructive participation by trade union representatives in a climate of total transparency.

Constant and scrupulous attention is also dedicated to safety and hygiene at the workplace. In particular, all employees and collaborators: (i) are required to comply with occupational health and safety regulations, using personal and collective protective equipment correctly; (ii) are encouraged to cooperate actively by communicating any accidents or, in any case, any potential risk conditions.

The company adopts a safety management system, sets standard operating procedures and carries out regular audits and risk assessments.

It also promotes continuous training and updates on safety procedures, so that each employee can operate with full awareness and responsibility.

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2.6 RELATIONSHIP WITH CUSTOMERS AND SUPPLIERS

SCIC S.p.A. is committed to establishing relationships with its customers and suppliers based on trust, transparency and fairness, avoiding any form of discrimination and exploitation.

In fact, the primary purpose of SCIC S.p.A. is to build and maintain customer confidence and satisfaction through the provision of high quality products and services, By adapting the latter to new needs and by finding solutions better suited to different needs.

In particular, the company undertakes to:

- Provide customers with clear, complete and truthful information about the products and services offered.
- Select suppliers on the basis of objective criteria such as quality, price, reliability and respect for environmental and social sustainability.
- Comply with contractual agreements and applicable competition laws.
- Prevent and counter all forms of corruption, collusion and conflicts of interest.
- Protect the confidentiality of business and personal information received from customers and suppliers.

2.7 PROTECTION OF THE ENVIRONMENT HEALTH AND SAFETY AND SUSTAINABLE DEVELOPMENT

The company is committed to managing its production processes in a sustainable way, minimizing the consumption of energy and natural resources, reducing waste generation and polluting emissions.

The company invests in innovative technologies and processes to improve its environmental performance. It also communicates its environmental policies and results to its stakeholders in a transparent manner.

In particular, with the aim of reducing CO2 emissions, SCIC S.p.A. has installed 70,000 square meters of solar panels on the roofs of its production sites, generating a power of 5,000 kWp and a productivity of 5,600,000 kWh per year.

2.8 INSTITUTIONAL AND PUBLIC COMMUNICATIONS

SCIC S.p.A. in the context of advertising promotion acts in full respect of fundamental ethical values. In particular, it is committed to communicate in a transparent, truthful and accurate way towards all its stakeholders, avoiding any form of deception or manipulation of information.

The company is also always careful to ensure that institutional communication is (and remains) consistent with the company's values and complies with current regulations.

SCIC S.p.A., in particular, promotes effective and transparent internal and external communication, based on mutual respect and sharing of information. Internal communication promotes employee engagement and confidence building. External communication helps to strengthen the company's reputation and build strong relationships with customers and all other stakeholders. Disseminate to target audiences, using all

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available means of communication including electronic means (internet).

SCIC S.p.A. is committed to protecting the privacy of its customers, employees and all subjects with whom it comes into contact. Personal data is processed in compliance with the applicable regulations, guaranteeing the security, confidentiality and transparency of the processing.

3. STANDARDS OF BEHAVIOUR

3.1 COMPLIANCE WITH LAWS AND REGULATIONS

SCIC S.p.A. is committed to scrupulously comply with all laws and regulations in force at national and international level, in all the countries where it operates. All employees and collaborators must comply with the legal provisions and applicable regulations, with the obligation to report any violations.

SCIC S.p.A. also adopts all necessary measures to prevent the commission of crimes by its employees, collaborators and representatives who are required to cooperate actively in the realization of this objective.

The same commitment to conduct ethically correct behavior is required of external employees, consultants, suppliers, customers and anyone who has dealings with the company. This is to protect and improve the reputation, credibility and business and professional correctness of SCIC S.p.A. SCIC S.p.A. undertakes to take the most appropriate initiatives and measures so that the objective of compliance with current rules and regulations, together with compliance with internal procedures, is understood and implemented by the members, senior staff and employees, as well as external employees, consultants, suppliers, customers and anyone with relationships with the company.

In particular, SCIC S.p.A. promotes a culture of legality and transparency, encouraging employees to cooperate with the competent authorities in case of requests for information or investigations.

It also undertakes to provide employees with all the tools they need to operate in accordance with the law. The company shall establish regular awareness, communication and training programmes on the topics and problems of the code of ethics.

3.2 CRITERIA FOR CONDUCT

In order to prevent the commission of crimes in the interest or at the disadvantage of SCIC S.p.A., for all company employees (chief and subordinate) and for anyone who has relations with the Company (business partners), the following are the criteria of conduct and prohibitions that any figure who undertakes relations with the company of any kind must comply.

- o Strictly observe all laws, regulations and procedures governing relations and/or contacts with public bodies, public administrations and/or public officials and/or public service representatives;
- o To make the relations with public bodies, public administrations and/or public officials and/or public services representatives transparent, fair and impartial;

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- o Manage any relationship, even occasional, with public bodies, public administrations and/ or public officials and/ or public service representatives, in a lawful and regular manner;
- o Acting, each according to its function, in compliance with the principles of fairness, transparency and cooperation, as well as in accordance with the procedures laid down in the conduct of the budgetary procedures, the periodic financial statements and the social communications in general;
- o Provide truthful and appropriate information on the economic, financial and wealth situation of the company;
- o Ensure the smooth functioning of the Company and its governing bodies, facilitating and guaranteeing all forms of internal control and promoting free formation and decision-making;
- o Scrupulously observe all the legal regulations set up to protect the integrity of the share capital;
- o Comply, in the event of a reduction in share capital, function and/or division, with the legal provisions for the protection of creditors;
- o Observe the internal procedures for selection and/or management of relations with partners;
- o To work, as far as it is competent, to respect the company's requirements and the legal requirements in terms of health and safety at the workplace;
- o Produce data, statements and documents that correspond to truth, without omitting due information or using artifices/ scams that may mislead the recipient;
- o Use the computer equipment (hardware and software) provided exclusively for lawful purposes and without causing damage to third parties, carry out unauthorized activities/ access, or otherwise conduct behaviors that violate the laws of law in the field of information security;
- o Use funding/funds/public or community contributions in full compliance with the rules/ requirements set by the granting entity
- o Spend/put into circulation/use cash and stamped securities in accordance with the applicable regulations, promptly reporting any irregularities (counterfeit banknotes, forged stamped securities, etc.);
- o Ensure decent working conditions for all company staff, avoiding abusive, discriminatory or harmful behaviour towards the individual, his or her beliefs and preferences;
- o Observe the common ethical standards of moral integrity, also with reference to the possible presence of links with criminal, terrorist, subversive or mafia-type associations;
- o Acquire/receive/use money or things from only reliable sources, ensuring maximum traceability and transparency of the related accounting transactions;
- o Carry out its work in the utmost respect of the environment and related corporate requirements.

3.3 PROHIBITED BEHAVIOUR

In the light of the conduct criteria, the following behaviour is specifically prohibited:

- o Offer a consideration in cash or other utility (e.g. employment contracts for relatives/acquaintances or consultancy contracts with relatives/acquaintances) for acts falling within the functions/powers of

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public officials or public service tasks (e.g. payment of invoices) or for acts not due (e.g. attesting to works not carried out or carried out to a lesser extent than declared, award of tenders and/or amendments/extensions of contracts, to influence the outcome of a judicial process or an administrative assessment, etc.). In this case, the offences of “corruption” are defined.

- o Committing the crime of “corruption between private individuals”, by complying with requests for money or other undue utility from directors, general managers, directors responsible for drafting company accounting documents, auditors and liquidators of companies or private entities (also for an intermediary person), in order to perform or omit an act in violation of the obligations inherent in their office or the obligations of loyalty.

- o Committing the offence of “soliciting bribery between private parties” by offering or promising money or other benefits to the persons referred to in the previous point, for the same purposes.

Any transgressions, will be punished with the maximum of the sanctions provided for by the Code of Company Discipline and will be reported immediately to the competent authorities.

3.4 CONFIDENTIALITY, TRANSPARENCY AND COMPLETENESS OF INFORMATION

SCIC S.p.A. undertakes to ensure the confidentiality of information held by it, based on personal data of customers, employees, collaborators and other subjects who are treated according to the current legislation on privacy with reference to Dlgs 196/2003 and its annexes, as well as the requirements of the guarantor for the protection of personal data and the European regulation n° 2016/679; Including trade secrets, trademarks, distinctive signs, technical and scientific knowledge and know-how.

SCIC S.p.A. adopts all the necessary technical and organisational measures to guarantee the security of personal data, protecting them from unauthorised access, loss, destruction or alteration.

The company carries out regular audits to assess the effectiveness of the security measures taken.

Employees and collaborators are expressly prohibited from disseminating or using confidential data and information for purposes not connected with the operation of the company, this prohibition remains valid even after the termination of the employment relationship.

SCIC S.p.A., moreover, is committed to communicate in a transparent and truthful way with all its stakeholders, providing accurate, complete and timely information.

4. IMPLEMENTATION AND MONITORING

4.1 REPORTS OF BREACHES OF THE CODE OF ETHICS

SCIC S.p.A. encourages each employee, collaborator or stakeholder to report any suspected violation of this Code of Ethics, guaranteeing the utmost confidentiality and protection of the whistleblower from any

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form of retaliation or discrimination.

In particular, SCIC S.p.A. has established channels through which anyone who becomes aware of cases of non-compliance, or is reasonably convinced of a violation of the Code, is obliged to report freely, directly and in an absolutely confidential manner (if applicable, also anonymous) via internal forms or in a non-anonymous form at sgs@scic.it

4.2 PENALITY SYSTEM

In case of violation of this Code of Ethics, SCIC S.p.A., if the violation is established, reserves the right to take disciplinary measures proportionate to the gravity of the violation committed, in compliance with the regulations in force art.7 Law 300/1970 "Workers' Statute", collective bargaining (CCNL National collective labour agreement for wood, cork, furniture, furniture and forestry) and individual employment contracts.

Such measures may include, but are not limited to, verbal warnings, disciplinary sanctions, suspensions from service and, in the most serious cases, dismissal.

Any form of retaliation against those who have made reports of possible violations of the code or requests for clarification on how they are applied is also a violation.

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