



## Introduction

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### What is the Code of Ethics?

The Code of Ethics is a set of principles and ethical, social and moral clauses to which our company aspires. By respecting and complying with them, we intend to guide our corporate activities, fully aware of the inextricable balance between business and ethics.

Overall, balancing these two seemingly opposing interests improves our company and, specifically, each and every human resource within it. Although it does not have direct legal significance, all Atag employees comply with the Code of Ethics and encourage its full adherence and distribution.

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### Our company

Atag is a significant and solid company that has been established in Italy since 1947.

It is currently an undeniably first-rate supplier of technical products for industrial applications. With three national locations and more than 20 representatives in Italy and across Europe, it has collaborations and exclusive agreements with important [national and European partners](#).

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### Aims of the Code of Ethics

As well as guiding the company through a single resource, Atag's Code of Ethics ("Code of Ethics") gives our company added value, showing the way for the management of activities and the promotion of human relationships inside and outside Atag.

The Code of Ethics, therefore, brings together our company's values – or rather, those values that have made Atag stand out since its establishment – as well as the rules of conduct that we ask all our people to follow.

Furthermore, the Code of Ethics is a general precept, which cannot be exempt, of the so-called "*Modello 231*" organisation and management model adopted by Atag pursuant to Italian legislation on the liability of entities for administrative offences arising from criminal activity, laid down in Italian Legislative Decree No. 231 of 8th June 2001.

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## The structure of the Code of Ethics

The Code of Ethics applies to all Atag's human resources, regardless of their role or professional status.

The Code of Ethics is divided into the following sections:

- General principles;
- Compliance with the law;
- Business development while protecting ethical standards;
- Implementation of provisions;
- Approval of the Code of Ethics and any amendments made to it.

Atag undertakes to maintain an appropriate internal control system during its operations. This comes in the form of all the tools necessary to guide, coordinate and verify business activities with the aim of ensuring compliance with company rules and regulations, protecting company assets, optimally and efficiently managing activities, and providing complete and accurate financial and accounting records.

## 1. General principles

### The “Recipients”

The Code of Ethics applies to all those who collaborate with Atag, specifically:

- representatives of governing bodies and all those who hold administrative, management or control positions within the company, including those who represent it;
- employees, of all levels and professional status, partners and any independent contractors;
- suppliers of goods and services, credit institutions, and public authorities that interact and maintain relationships with Atag, only in terms of taking note of the principles upon which Atag bases its operations on the market.

These people will be referred to, individually or collectively, as “Recipients”.

### Sharing the Code of Ethics

All Recipients of the Code of Ethics must be aware of the principles to which Atag aspires.

Through the distribution of the Code of Ethics, our company is promoting a corporate culture based on ethical rules, fully aware of the commitment that Recipients must make in complying with the values set out herein and of the mentality that needs to be adopted in their conscious and voluntary implementation.

On these grounds, both top figures and employees at Atag are called upon to comply with and develop the values of the Code of Ethics and to promote an ethical culture in their work.

Ethically experiencing the company's mission and transmitting these principles to others is part of the professional commitments with which Atag asks all Recipients to comply.

### Work ethic

All Recipients undertake to give their best in their work for Atag and to improve and enhance their expertise in line with the employer's expectations as well as their skills and capabilities.

Through suitable procedures for internal management and external communication, Atag ensures the correct management of corporate information.

Atag's business interest – which must never conflict with the law or the principles and regulations of the Code of Ethics – must always inspire Recipients, who must not have a conflict of personal interests with business ones or with the values expressed in the Code of Ethics.

## 2. Compliance with the law

### Laws and regulations

Recipients of the Code of Ethics are required to:

- comply with the law and regulations in the countries in which they operate;
- comply with the company's guidelines, protocols, procedures and regulations, first and foremost with the Control and Management Model;
- comply with the obligations relating to diligence and loyalty, as provided for by Articles 2104 and 2105 of the Italian Civil Code, where applicable;
- diligently adhere to the behavioural guidelines contained in the applicable national collective employment agreement.

### Protection of business transparency

While protecting business secrets and exclusive rights, which are essential company assets, Atag acts with the utmost transparency in the performance of its business activities. It pursues its trade by demonstrating the utmost professionalism and transparency.

All this with the aim of opposing money laundering, self-laundering and stolen goods.

### Working hours

ATAG applies the rules regulating employee work prescribed in the CCNL, therefore the normal duration of effective work is set at 40 hours per week.

### Privacy

Atag operates in compliance with the General Data Protection Regulation (EU) 2016/679 of the European Parliament and Council of 27th April 2016, as well as with the relevant Italian legislation.

It protects the personal data of which it comes into possession and adopts all the appropriate separation and storage measures necessary in the performance of its operations.

It only carries out the processing that is strictly necessary to achieve company objectives.

### Health and safety

Atag is aware of and complies with the provisions of Italian Legislative Decree No. 81 of 9th April 2008 concerning health and safety in the workplace.

To this end, Atag prepares, maintains and ensures safe, healthy working environments, encouraging responsible behaviour from all employees. shared by several people.

It plans and carries out appropriate training on health and safety in the workplace. Through specific maintenance programmes, it also keeps machinery in good working condition, which it uses safely and in compliance with the regulations.

Smoking is not permitted – even if not expressly prohibited – in places where it could put the health and safety of others at risk and in all working environments shared by several people.

Atag has not forgotten the importance of the psychological well-being of its employees, enhancing, acknowledging and guaranteeing it through a work policy aimed at respecting people as a whole, also from a psychological point of view.

## Protection of the environment

For the purposes of express legal definition, the environment should be understood as a “system of relations between anthropogenic, naturalistic, chemical and physical, climatic, landscape, architectural, cultural, agricultural, and economic factors, resulting from the implementation of plans, programmes or projects on the ground at different phases of realisation, management and phasing out, as well as any malfunctions”.

Atag aims to achieve and protect a balanced relationship between human activities and nature.

First of all, Atag pursues its objective of balance through the prevention and, therefore, the management of risks for human health and the environment itself.

At the same time, Atag promotes cooperation and fair and productive collaboration between all its employees and state bodies responsible for monitoring and protecting the environment.

## Relationships with the public administration

Atag cooperates fully and actively with the authorities in all countries in which it operates, complying with the regulations in force.

Precisely for this reason, any behaviour that may come under the category of offences envisaged by Title II, Book II of the Italian Criminal Code entitled “*Dei delitti contro la pubblica amministrazione*” (Crimes against the public administration) is condemned.

Based on this principle, all employees and/or contractors are asked to:

- avoid behaviour that may lead to criminal hypotheses, even only of an abstract nature, as set out in Italian criminal law;
- have dealings with the public administration only via written forms of communication;
- file the communication set out in the point above;
- report to top management on a quarterly basis with regard to dealings with the public administration, the reasons for them and their outcomes;
- avoid sharing incorrect information in the name and on behalf of the company;
- avoid putting their personal interests before those of Atag;
- avoid making payments in cash or without written justification. In any case, all payments must be authorised in advance and in writing by the manager in charge of this task.

## Corruption between private parties

It is forbidden to offer, promise or give – even through a third party – money or other undue benefits to management figures, their subordinates, regulatory bodies or any other individuals employed by other companies or belonging to private bodies so that they perform or avoid carrying out acts in infringement of their legal obligations, or rather, of the obligations relating to their office.

## Relationships with judicial authorities and inspection bodies

Atag must ensure the utmost care and productive collaboration with judicial authorities and all offices that carry out inspections, in compliance with the prerogatives and rights granted to those affected by investigations, checks and controls, and those who are called to testify.

Any behaviour that is at odds with this approach is not permitted or tolerated by Atag.

## Top management conduct and corporate crimes

Those who represent Atag are duty-bound to transmit the company's values also and especially to those who are not part of it.

For this reason, particularly from its representatives, Atag expects the utmost loyalty and complete adherence to the ethical precepts on which it intends to base itself.

In general, these individuals are asked to:

- behave correctly, transparently and collaboratively, in compliance with the law and internal company procedures, in all activities aimed at preparing the financial statements and other corporate communications, in order to provide shareholders and third parties with true and correct information concerning the capital and financial position as well as the operating results of the company;
- strictly comply with all the rules laid down by law to protect the integrity and effectiveness of the share capital so as not to adversely affect guarantees from creditors and third parties in general;
- respect statutory standards and those drawn up by the Organismo Italiano della Contabilità (Italian accounting board) as well as those on an international scale set out by the International Accounting Standards Board;
- ensure the regular functioning of the company and its governing bodies, guaranteeing and facilitating all forms of internal control over the management of the company provided for by law, as well as the free and correct formation of the shareholders' will;
- make all communications required by law to supervisory authorities in a timely and correct manner, in good faith, without introducing any obstacles to the performance of supervisory activities carried out by them;
- respect the deadlines set out by law for the preparation and approval of the financial statements.

## 3. Business development while protecting ethical standards

### Perspectives and values

Atag's management is open to discussions and supports the needs of its interlocutors.

Moreover, innovation and competitiveness are counterbalanced by a sense of duty and respect for others.

This is why unfair and discriminatory behaviour is strongly discouraged between colleagues of all categories and at all levels, as well as among its directors.

Portraying the company's value can only occur through its partners spirit of collaboration.

Atag aspires to maintain and develop relationships based on trust with all its employees, suppliers and customers, whose contribution is necessary to achieve the company's goals.

### Promotion of equal opportunities

Atag puts human rights before market interests.

Among the former, Atag recognises the vital importance of ensuring equal opportunities in its operations for all those who intend to approach and become part of the company in any way.

In choosing and nurturing its employees, distinctions are not made based on ethnicity, nationality, gender, age, sexual orientation, trade union or political opinions, philosophical views, or religious convictions. Likewise, no other element that may somehow distinguish or characterise people, except in relation to qualifications and merits achieved, is of any relevance.

This is precisely because, for Atag, people represent the heart of the company and are its ethical image for all stakeholders.

All Recipients are asked:

- not to tolerate sexual harassment and physical or psychological bullying of any kind and in any context;
- to listen to requests from colleagues, customers and suppliers without any preconceptions and without behaving with the sole aim of defending their own position and work;
- to avoid making decisions or carrying out activities, in the performance of their duties, that contrast or conflict with the company's interests, or that, in any case, are not compatible with their official duties;
- to show sensitivity and respect towards others, avoiding any behaviour that may be considered offensive;
- to work in full compliance with laws and regulations in force, not only legislative ones but also company ones.

It should be specified that Atag operates in compliance with values of integrity, honesty, fairness and loyalty.

For this reason, therefore, in order to prevent criminal and administrative offences from arising internally, the company self-disciplines its operational structure through a transversal and multilevel control system:

- offering Recipients reporting channels, which are also anonymous;

- ensuring communication among its employees;
- recognising the importance of listening, clarity, transparency and collaboration.

## Staff and training

Atag takes care of training all its members of staff and encourages participation in any courses to update their skills and in training programmes relating to and in conjunction with the achievement of company objectives.

The company's evaluation system is managed transparently and objectively. It must take into due consideration observance by members of staff of the regulations of the Code of Ethics, which serves to strengthen motivation, reward fairly and encourage the achievement of excellent results.

Atag intends to ensure that members of staff are treated in compliance with fundamental rights and freedoms, taking into account the dignity of individuals, as provided for by applicable legal regulations.

## Loans, also to third parties and public bodies

Atag protects the values and principles of the Code of Ethics concerning behaviour, not only directly, through the promotion and monitoring of compliance with the values laid out, but also indirectly, by refusing any form of loan that may encourage or fuel illegal behaviour.

## Freebies, gifts and other forms of benefits

It is strictly forbidden for all those who collaborate with Atag to offer or receive, directly or indirectly, money, gifts or other forms of benefits of any kind in a personal capacity to and from executives, officials or employees of customers, suppliers belonging to other companies or public bodies and other organisations for the purposes of obtaining an undue advantage or influencing the recipient's discernment.

Acts of courtesy, such as gifts and forms of hospitality are allowed provided that they are of a modest value so that they may be considered normal in their occurrence, incapable of compromising the integrity and reputation of the recipient, and unable to influence the recipient's judgement.

## Accounting control and transparency

All those who work at Atag are committed, directly or indirectly in the name and on behalf of the company, to the transparent management of the corporate accounts.

Therefore, policies and procedures aimed at tracing operations and cash flows are promoted within Atag so as to ensure the full accuracy of the accounting records from a regulatory and financial point of view.

In the preparation of its accounting records and financial statements, Atag uses all the legal provisions and regulations that are currently in force to their full extent.

## 4. Implementation of provisions

### Distribution of the Code of Ethics

All Recipients are made aware of the Code of Ethics and updates made to it via appropriate means of communication and distribution. This is so that the values and principles contained within are known and applied, and individual initiatives cannot lead to behaviour that is inconsistent with the ethical standpoint pursued by Atag. In particular, the Code of Ethics is published on company noticeboards and in every department.

A paper copy of the Code of Ethics is handed over to each director, employee and contractor upon their appointment, hiring and start of their relationship with the company respectively.

### Infringements and resulting sanctions

Anyone who becomes aware of behaviour that may be understood, even in an abstract way, to constitute an infringement of the rules set out by the Code of Ethics is required to report it to their employer or use the anonymous procedures in place.

Atag will not tolerate any kind of retaliation, discrimination or penalisation for reports that have been made in good faith and to protect the company's assets and image.

Measures deemed appropriate will be adopted towards perpetrators of illicit conduct, independently of any criminal proceedings by the judicial authorities or request for compensation for damages from third parties, communicating the sanctions imposed to the competent corporate functions.

Should the infringements of the Code of Ethics be attributable to the behaviour of Atag employees, Atag will have the right to adopt the most appropriate sanctions, proportioning the seriousness of the infringement that occurred with the provisions laid down in the relevant national collective employment agreement.

In fact, compliance with the provisions of the Code of Ethics is to be considered an essential part of the contractual obligations for employees, suppliers and consultants.

## 5. Approval of the Code of Ethics and any amendments made to it

### Applicability of the Code of Ethics

Atag's Code of Ethics has been approved by the Board of Directors through an express resolution.

Atag has the right to integrate, revise and extend the scope of the provisions in this text. The updated version will become applicable immediately for all Recipients as soon as it has been expressly communicated to them.

It should be understood without a shadow of a doubt that it is the sole responsibility of the Recipients of the Code of Ethics to endeavour to fully understand the text itself, even if this requires Atag's support. To this end, Atag is available through its directors.

The Code of Ethics does not replace current and future company procedures, which remain effective while they do not conflict with the Code of Ethics.

### Interactions with the Control and Management Model pursuant to Italian Legislative Decree 231/2001

The Code of Ethics should be considered an integral part of the "*Modello 231*" organisation and management model used by the company.

In fact, creating a proper interaction between its systems of compliance is most useful for Atag, to avoid the risk of offences being committed on the one hand and to connect its business activities with legally established standards on the other.

**ATAG SpA**