



CODE OF ETHICS AND CONDUCT

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Change history

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1. GENERAL

The Company intends to comply with the law wherever we operate and to conduct all business activities aiming for highest ethical standards.

This Code of Ethics and Conduct summarizes the standards that must guide our actions. Our commitment flows naturally from our responsibilities to our stakeholders.

Each employee at the Company is responsible for his own behaviour. While performing our duties, we are responsible for ensuring that we conduct ourselves in a manner that reflects positively on the Company.

Every employee's personal responsibilities include:

- Complying with all applicable laws and regulations
- Complying with all applicable Company policies
- Maintaining appropriate ethical behaviour
- Reporting any suspected misconduct, illegal activity, fraud or abuse of Company assets

2. EMPLOYEES

We believe in treating people with dignity and providing equal employment opportunity for all employees in our practices of recruiting, compensation and professional development.

We believe in respecting human rights, providing safe and healthy working conditions, and respecting employees' rights to bargain collectively.

We recognize that integrating the unique attributes and talents of our diverse workforce contributes to more creativity and better solutions to problems.

We expect our employees to speak out when they see ethical lapses.

We do not want others to ask our employees to do anything wrong and, likewise, will not ask anyone else to do anything wrong.

3. FAMILIES

We strive for a healthy balance between our work and our family lives.

4. COMMUNITIES

We strive to contribute to the overall quality of life wherever we operate.

We want communities to count on us for our help in civic, charitable and other community activities.

5. ENVIRONMENT

We strive to operate in a manner that has a minimal, if not zero, impact on the surrounding environment.

This includes the sourcing of the materials we use in our products, and the monitoring of the impact our processes have on the environment.

6. SUPPLIERS

We strive to choose vendors and suppliers objectively and strive for honesty in all business dealings with them.

We will make purchasing decisions on the basis of such factors as price, quality, delivery, service and integrity.

Our suppliers are made aware of our Code of Ethics and encouraged to adopt and maintain the same values in their work.

7. EQUAL OPPORTUNITIES

All employees deserve a workplace where they feel respected and appreciated.

Our policies are designed to ensure that employees are treated fairly and with respect, by the Company and each other.

The Company will hire, evaluate, transfer, compensate and promote employees solely based on skills and performance, without discrimination.

8. HARASSMENT-FREE WORKPLACE

Harassment may occur when the words, actions or behaviour of members of the work group create an intimidating, hostile or offensive work environment.

Any type of harassment can be destructive to a positive work environment and will not be tolerated.

9. HEALTH AND SAFETY

We are committed to the health and safety of our workers, as defined in our HSE policy.

10. ENVIRONMENT

We are committed to the good health of the environment in which we work and operate. Towards this goal, the Company has obtained and will continue to renew the ISO 14001 certification.

11. SUBSTANCE ABUSE

It is the policy of the Company to maintain a safe, healthy and productive work environment for all employees. To that end, the Company will act to eliminate substance abuse as it increases the potential for accidents, absenteeism, substandard performance, poor employee morale or damage to the Company's reputation.

As a condition of continued employment with the Company, employees must comply with all applicable substance abuse policies, guidelines and/or procedures.

These rules are made explicit in the employee handbook.

12. CONFLICT OF INTERESTS

A conflict of interest occurs when our private interests interfere in any way with the interests of the Company.

Employees dealings with customers, suppliers, contractors, competitors or any person doing or seeking to do business with the Company must be in the best interest of the Company to the exclusion of consideration of personal preference or advantage.

13. DONATIONS, GIFTS, FAVOURS, ENTERTAINMENT

Business gifts and entertainment are customary courtesies designed to build goodwill among business partners. These courtesies include such things as meals and beverages, accommodations, travel and other merchandise or services.

However, a problem may arise when such courtesies compromise – or appear to compromise – our ability to make objective and fair business decisions.

The Company prohibits the offer of any type of payment or benefit to any national or foreign governmental authority for the purpose of obtaining or maintaining business or any commercial advantages.

Employees should neither seek nor accept for themselves or others any gifts, favours or entertainment without a legitimate business purpose, nor seek or accept loans (other than conventional loans at market rates from lending institutions) from any person or business organization that does or seeks to do business with, or is a competitor of the Company.

The Company may decide to offer contribution to charity institution and social programs with exclusion of political parties. Oversight of these contributions is assigned to Admin and HR dept Head, and these contributions are made public in the Company's Sustainability Report.

14. CORRUPTION, BRIBES, KICKBACKS

It is categorically forbidden to directly or indirectly offer, pay, solicit or accept bribes or kickbacks in any form. These are criminal actions that can lead to prosecution.

In case of suspicion of fraud and/or corruption, the Company will start appropriate activities of investigation and apply relevant sanctions to the guilty subjects.

Employees are encouraged to denounce irregularities directly to the top management of the Company.

Denouncers in good faith are adequately protected by the consequences of their collaboration.

If an employee wishes to anonymously denounce any irregularity (whistleblowing), means of doing so are provided by the implementation of an anonymous suggestion box.

The effectiveness of the anticorruption program and the application of the present Code of Ethics and Conduct are verified periodically at the time of the management review and follow up.

15. INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

Our creativity and innovative ideas make significant contributions to the Company's continued success in the marketplace. We must protect and leverage our intellectual property, which includes inventions, discoveries, improvements, ideas and proprietary information.

The same protection is offered to any intellectual property our collaborators (suppliers, customers) decide to share with the Company.

Employees who have access to proprietary and confidential information are obligated to safeguard it from unauthorized access, not disclose this information to persons outside the Company, not share this information with other employees except on a legitimate "need-to-know" basis.

The company complies with European regulations (GDPR) regarding personal information of any individual that has contacts with the company.

16. FINANCIAL REPORTING INTEGRITY

As Italian law requires, Valland strives to make sure that every business record is accurate, complete and reliable.

This standard also applies to all operating reports or records prepared for internal or external purposes, such as environmental data, product test results, quality control reports or sales projections.