

MORE  
THAN  
TECH  
NOL  
OGY

CAME Code of Ethics

**CAME** Code of Ethics

# TABLE OF CONTENTS

4	<b>INTRODUCTION</b>
5	<b>I - GENERAL PROVISIONS</b>
5	1. FIELD OF APPLICATION AND RECIPIENTS
5	2. OBLIGATIONS UPON RECIPIENTS
6	3. DISTRIBUTION AND IMPLEMENTATION
6	<b>II - THE CAME GROUP'S VALEUS</b>
6	4. GENERAL PRINCIPLES
7	5. INTEGRITY AND FAIRNESS
7	6. RESPECTING THE INDIVIDUAL
7	7. CONFIDENTIALITY
7	8. TRANSPARENCY
8	9. COLLABORATION
8	10. RESEARCH AND INNOVATION
8	11. QUALITY
8	<b>III - VALUE OF HUMAN RESOURCES</b>
8	12. HEALTH AND SAFETY
9	13. DIGNITY AND RESPECT FOR THE INDIVIDUAL
10	14. VALUING AND PROMOTING HUMAN RESOURCES
10	<b>IV - RELATIONS WITH STAKEHOLDERS</b>
11	15. BUSINESS RELATIONS
11	16. RELATIONS WITH CUSTOMERS
12	17. SAFEGUARDING COMPETITION
12	18. CONFLICTS OF INTEREST
12	19. TRANSPARENCY AND INFORMATION TRACEABILITY
13	20. RELATIONS WITH INSTITUTIONS
15	21. COMBATTING CORRUPTION
15	22. RELATIONS WITH THE LOCAL COMMUNITY
15	23. PROTECTING PRIVACY
15	<b>IV - ENVIROMENT</b>
16	24. ENVIRONMENTAL PROTECTION
16	<b>V - COMPANY RESOURCES</b>
17	25. USE OF COMPANY ASSETS
17	26. PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY
17	27. PROTECTING IMAGE AND REPUTATION
17	<b>VI - FINAL PROVISIONS</b>
18	28. DISCIPLINARY SYSTEM
18	29. WHISTEBLOWING

## INTRODUCTION

The CAME Group (hereinafter the “Group”) is made up of multiple Companies located all around the world, which collaborate in the context of an integrated and global vision aimed at promoting the diversity of the various brands and divisions.

Extensive experience and a great passion for research, technology and innovation have enabled the CAME Group to become a leading brand in the sector of integrated solutions for the automation, control and security of residential, public and urban settings.

As a network stretching across the world, the CAME Group’s goal is to identify solutions aimed at creating a balance between humans and technology, focusing its development process on the well-being and needs of people, in order to improve the quality of private and collective living environments.

**“However technologically advanced any automation may be, it still must be built around people’s needs.”**

*President of CAME Group, Paolo Menuzzo*

The CAME Group has established five fundamental values underpinning its business:

1. **"PURSUE INNOVATION"** → We promote curiosity and new ideas;
1. **"ACHIEVE GREAT RESULTS"** → We aim for increasingly challenging goals;
2. **"WORK AS A TEAM"** → We share genuine passion and determination;
3. **"DO THE RIGHT THING"** → We believe that integrity builds trust and credibility;
4. **"START WITH THE CUSTOMER"** → We consider the customer our priority.

The CAME Group firmly believes that investment in research and innovation, promotion of people and their expertise, stability of commercial partnerships, attention to local areas and communities and continuous improvement of the quality of products and processes are essential, determining factors for growth of the business and creation of value.

The Group has always done business with close attention to the pursuit and sharing of its vision and values, which it considers to be essential for its development.

On this basis, with this Code of Ethics, the Group defines the fundamental values and principles of conduct that must guide activities and actions of the Group. Recognising its responsibilities outside of the business, the Group undertakes to fulfil them in all contexts in which it operates.

The Code of Ethics (hereinafter the “Code”) represents a system of values shared within all Group Companies and which therefore expresses corporate ethics as a whole.

The CAME Group adopts the principles and values set out in the Code in all of its operations, in the firm belief that conducting business with a clear awareness of its ethical and social responsibilities is essential to achieve its economic, production and responsibility goals.

# I. GENERAL PROVISIONS

## 1. Field of application and Recipients

The Code of Ethics is addressed to all CAME Group Companies. By adopting it, these Companies are bound by its values and principles, and the rules of conduct it contains.

Specifically, the provisions of the Code apply to all members of corporate administration and control bodies (directors, auditors, general managers and managers) and to all employees of Group Companies, as well as any third parties performing activity in the name or on behalf of the Group (consultants, representatives, intermediaries and agents, etc.).

The CAME Group undertakes to pursue and disseminate its values and ethical principles in all activities and contexts in which it operates. To this end, with regard to external activity, the Group takes action to raise awareness and engage its stakeholders (suppliers, contractors, commercial partners, customers, local communities, etc.) in implementation of the principles and values contained in this Code, in order to promote socially and ethically responsible conduct aligned with its values and ethical principles.

The Group also reserves the right to adopt corrective measures following the identification of conduct that contradicts its values and principles.

## 2. Obligations upon Recipients

Recipients of the Code of Ethics undertake to read and understand, adopt, share and base their conduct on the values and principles it contains, thus contributing to disseminating a socially and ethically responsible corporate culture.

To this end, all Recipients of the Code undertake to:

- act responsibly in accordance with the principles of professional and fair conduct set out by the code of ethics, applicable laws and regulations, and internal rules and procedures;
- understand and assimilate the rules of conduct it contains;
- request clarification from appointed company departments regarding any doubts around interpretation of the code;
- share, raise awareness of and promote the values and principles of the code and set an example through one's on work;
- refrain from any conduct that contradicts the principles and ethical values of the code;
- identify and report any actual or potential breaches of the code of ethics, internal rules and procedures, and applicable laws and regulations;
- adopt, within the scope of the individual's role, corrective measures following conduct in breach of the code.

In any case, Recipients of the Code must observe the values set out in the Code and by applicable legislation and under no circumstances may the belief that they are acting in the interests of the Group justify conduct that breaches these rules. The CAME Group unconditionally prioritises observance of all laws of all levels above its own economic interests.

### 3. Distribution and implementation

The Code of Ethics is approved by the administrative bodies of CAME Group Companies. Any future updates, due to amendments to laws or changes within the company, will be approved by the administrative bodies and promptly communicated to all Recipients.

The CAME Group distributes the Code of Ethics through various communication channels, in order to promote observance and raise awareness amongst its stakeholders regarding conduct aligned with the values and ethical principles defined and pursued.

On this basis, the Code of Ethics is:

- available for download and consultation for all stakeholders on the company website at the following link: <https://www.came.com/uk/social-responsibility>
- distributed to all employees and signed by them during onboarding
- referenced, with a specific clause, in all supply, consulting and professional service contracts, with signing thereof representing a declaration of having understood and accepted the rules contained in their entirety.

The Code of Ethics is the subject of:

- assessments of its implementation by recipients
- updates and/or implementation made necessary by needs as they arise
- specific training for all recipients.

This Code must also be considered an integral part of the Organisation, Management and Control Models pursuant to Italian Legislative Decree 231/01 (hereinafter “231 Model”) adopted by the Group Companies, and the overall Group internal control system. In this context, the principles and values of the Code of Ethics also represent a useful reference for interpretation in actual application of the 231 Models.

Pursuant to Italian Legislative Decree 231/01, a Supervisory Body (hereinafter “SB”) has been set up. This is an independent body appointed by the Boards of Directors of Group Companies and tasked with ensuring and monitoring correct application and observance of the rules contained in the Organisation, Management and Control Models and the Code of Ethics.

The SB is also tasked with management of reports of possible breaches of the rules contained in the 231 Models and the Code of Ethics. The Supervisory Body proposes possible amendments and additions to the rules contained in this Code of Ethics, submitting these to the Board of Directors for the necessary approval.

## II. THE CAME GROUP'S VALUES

### 4. General principles

The Code of Ethics contains a set of principles and values that it is essential to follow for the correct operation, reliability, reputation and image of the Group. These principles are the basis for actions, conduct and relations, within and outside the Group.

The CAME Group considers pursuit of these values and ethical principles to be essential for achievement of its economic, production and social objectives.

All Group operations must be conducted in line with principles of honesty and observance of the law, integrity, fairness, transparency, loyalty, responsibility and good faith, along with the other ethical principles set out in this Code of Ethics, in relation to customers, shareholders, suppliers, employees, external personnel, commercial and financial partners and public administrations.

## **5. Integrity and fairness**

The CAME Group considers it fundamentally important to conduct its business responsibly and professionally, with full observance of applicable laws and regulations and in relation to both internal and external relations.

All actions, transactions and activities performed in the name and on behalf of the CAME Group must be performed with diligence, in good faith, fairly, with correct conduct, honestly and in accordance with applicable legislation and internal procedures.

The Recipients perform their role or function with loyalty, in line with criteria of transparency and mutual respect, and making optimal use of the tools and time available, with a view to greater efficiency.

## **6. Respecting the individual**

Recognising the undeniable and supreme value of the individual, the Group commits to safeguard and promote their unfringeable rights.

In this context, the CAME Group operates with complete respect for human dignity, rejecting any form of discrimination based on age, race, gender, sexual orientation, social or personal conditions, language, nationality, political opinions or religious beliefs and ensures the working environment is safe and inclusive, valuing diversity and uniqueness, which are considered a source of benefit.

## **7. Confidentiality**

Protecting the confidentiality of information is considered a fundamental component for the Group's business.

In the performance of their working activity, Recipients handle data acquired maintaining the utmost attention to confidentiality, protection, integrity and traceability of data, in accordance with applicable laws and internal procedures established for the purpose.

Information, data and documents acquired and/or processed in the context of their role or function within the Company may not be used, divulged or shared without specific authorisation.

Processing of the personal data of natural persons and organisations is performed with full observance of rights, fundamental freedoms and human dignity, with particular reference to confidentiality and personal identity, in compliance with applicable legislation.

## **8. Transparency**

The CAME Group considers transparency to be an essential condition for the correct, regular and efficient running of its business. Transparency is understood by the Group as a principle that guides its business, capable of ensuring and guaranteeing a high level of shareholder trust and faith in its operations.

For this reason, every operation, transaction and action carried out is aligned with criteria of truthfulness, completeness and clarity, adopting methods that ensure traceability, documentability and verifiability.

In the same way, all external communication, whether formal or otherwise, must be clear, accurate, precise and transparent in line with internal procedures and applicable legislation.

## **9. Collaboration**

The ability to actively collaborate, build strong and lasting relationships, share common goals and work together to achieve them, are considered fundamentally important by the CAME Group for correct and successful development of its business.

In this framework of shared growth and continuous improvement, the CAME Group considers it essential to value and enhance the skills, experience and qualities of each individual.

## **10. Research and Innovation**

The CAME Group believes and invests in research, innovation and technology, considering these aspects to be fundamental for achievement of its goals. With a long-term vision, the Group is committed to monitoring and understanding developments in people's needs and requirements, designing and developing solutions aligned with these needs that can improve quality of life and social well-being, whilst contributing to greater safety and lower environmental impacts.

## **11. Quality**

Quality is a shared value across all areas of the Company and one of the components that the CAME Group considers most important for correct running and ongoing development of its business, as well as for the generation of value.

Constant improvement is one of the Group's primary goals. Through significant investments in research and innovation and constant and constructive dialogue between company divisions, the Group undertakes to guarantee high standards of quality for processes, products offered and services provided.

The Group has identified a series of tools aimed at ensuring quality in all phases of product and service development, equipping itself with a system of internal procedures that are constantly updated and revised, and providing adequate training on their content.

# **III. VALUE OF HUMAN RESOURCES**

## **12. Health and safety**

The CAME Group considers safeguarding of the physical and moral well-being of its employees, as well as external personnel, customers and the communities in which it operates, is an absolute priority. On this basis, the Group is committed to guaranteeing that every activity is performed in a safe and healthy environment, in accordance with the highest international health and safety standards and applying principles of prevention, protection, identification and management of risk.

The Group defines training programmes for its own employees, aimed at promoting knowledge and awareness of risks linked to health and safety, also ensuring analysis and detailed identification of associated risks, defining prevention and management tools, in order to protect people involved in the processes in question.

The Group constantly updates internal procedures on the basis of new risks arising linked to health and safety, adopting the best technology and methods for prevention.

Correct application of internal procedures and applicable regulations on health and safety is monitored through specific audits conducted internally by the Group and on its suppliers/contractors, with corrective actions adopted if issues are identified.

The Group is committed to generating and promoting a safe, secure and healthy working environment and to this end, it has:

- banned smoking in work areas, where it is not permitted and may generate a hazard
- banned the consumption of alcoholic drinks in work areas and during working hours.

Recipients undertake to:

- diligently observe internal procedures and applicable legislation on health and safety
- promptly report the existence of any un-managed risks that may represent a hazard to people or property to their line manager
- always use safety devices and personal protection equipment assigned to them
- immediately inform their line manager in the event of any accident, even if it occurs without consequence
- not engage in dangerous and/or unlawful behaviour that may lead to potential risks for the health and safety of others.

### **13. Dignity and respect for the individual**

The CAME Group, considering people to be a fundamental component of its success, is constantly committed to guaranteeing a working environment in which respect and dignity of the individual are wholly maintained, establishing relationships based on fairness, collaboration, non-discrimination, equality, professional conduct, loyalty and trust.

The CAME Group excludes all forms of discrimination on the basis of age, gender, sexual orientation, personal and social conditions, race, language, nationality, political opinions and union affiliation and religious beliefs, in its relations (management of personnel and organisation of work, relations with shareholders, relations with customers, selection and management of suppliers, relations with the community and institutions representing it).

All forms of violence, duress and harassment, including any behaviour, attitude or discourse, also of a sexual nature, that may cause distress, fear or upset to another person, represent an unacceptable violation of personal dignity and are therefore strictly forbidden. Individuals adopting such behaviour will be sought out and may be subject to disciplinary penalties, and where the conduct is considered particularly serious, shall be reported to the competent authorities for appropriate investigation.

The CAME Group, considering the fundamental importance that its relations are rooted in criteria of mutual respect, dignity, collaboration, loyalty and professional conduct and fairness, prohibits Recipients of this Code from:

- any behaviour aimed at establishing an intimidatory or hostile working environment, or one that isolates individuals or teams
- unjustified interference in the performance of others' work and hinderance of individual career prospects of other for reasons of competition

- attitudes or behaviour that may be considered sexual harassment
- abuse of a position of superiority in the organisational hierarchy, in which authority must instead be exercised fairly and properly.

Furthermore, the Group prohibits any retaliatory action aimed at punishing or impeding the reporting in good faith of cases of discrimination or personal harassment.

#### **14. Valuing and promoting human resources**

The CAME Group considers people essential for its growth and success, and its most valuable resource. On this basis, the Group protects and promotes the value of human resources and, in order to improve and develop the skills and expertise of each employee, provides training programmes aligned with the role and characteristics of each individual.

Training is considered a tool with which to transfer new knowledge, develop individual potential and enhance existing qualities, in order to stimulate continuous research into new solutions and drive innovation.

The central importance of training for the CAME Group is clearly demonstrated by the training activities also offered to partners and professionals collaborating with the Group, who are provided highly specialised training paths, with the goal of improving the quality of services provided, strengthening professional expertise and providing technical and regulatory knowledge.

Management of employment relationships is rooted in the criteria of fairness and merit, and in the values of the Group. The adoption of these principles forms part of the process for selection of CAME Group employees, and is rooted in principles of objectivity and the valuing of merit and expertise, and equal opportunities between genders.

Merit-based decisions and fairness are also essential in the definition of employee remuneration. In application of applicable regulatory and contractual provisions, and in line with salary policies in the relevant market, the Group takes into consideration the responsibilities accrued and the level of commitment, as well as professional growth demonstrated.

The CAME Group recognises that sharing and the exchange of ideas, collaboration and cooperation between people, and establishment of an inclusive working environment where diversity is respected, can stimulate the development of innovative ideas and excellent results. On this basis, in relations with its employees and external relations, the Group promotes the idea that teamwork, sharing of ideas and promotion of diversity and inclusion are essential factors for achievement of goals set.

### **IV. RELATIONS WITH STAKEHOLDERS**

#### **15. Business relations**

The Group shares and promotes the idea that lasting collaborations, founded on shared goals, transparency and fairness, can generate success. On this basis, the Group has adopted a corporate policy that prioritises the choice of tried and tested local external suppliers, which have grown alongside the CAME Group with shared values and principles.

The CAME Group maintains the importance of managing relations with its suppliers and commercial partners in line with principles of legality, loyalty, impartiality, fairness, transparency and traceability of transactions. Fully aligned with these principles, it has defined internal procedures aimed at managing processes for selection, qualification and monitoring of its suppliers and commercial partners. The Group's goal is to establish and maintain relations with parties that respect and share values and ethical principles with the Group, including the importance of health and safety, protection of the environment and the quality of product and services provided, in addition to meeting requirements of speed, efficiency and guaranteed support.

To this end, the Group carries out audits of its suppliers and contractors in order to monitor observance and maintenance of requirements and standards defined by the Group, and adopt corrective actions where applicable.

The CAME Group undertakes in any case to observe objective and transparent selection methods, avoiding practices aimed at creating situations and forms of dependence and sufficiently documenting the phases of establishment, management and cessation of the relations in question.

## **16. Relations with customers**

The CAME Group operates in the international market through commercial strategies and policies rooted in principles of fairness, transparency and professional conduct, always taking into consideration the importance of customer satisfaction in conducting its operations.

The CAME Group move towards a multicultural organisation enables definition, right from the development phase, of products that are aligned with the specific requirements of the reference market, adapting solutions offered based on different local cultures.

The Group is committed to guaranteeing that products and services provided are always aligned with the quality standards it promotes and that information published is always transparent and truthful. It also ensures that it provides support to its customers during all phases of contractual relationships, paying particular attention to the management of complaints, considering this phase for identification of areas for improvement regarding process efficiency and product quality.

In order to pursue these objectives, in relations with customer, and in general in external relations associated with their working activity, each employee is required to align their behaviour with criteria of politeness, collaboration and transparency, providing complete and adequate information wherever requested or necessary and avoiding, in all circumstances, behaviour that is evasive, improper or in any case aimed at undermining the independent judgement of the other party.

## **17. Safeguarding competition**

The Group recognises that correct, free and fair competition is a key condition for growth and constant improvement of the business. These values are adopted through logics of efficiency and an open market, preserving the value of fair competition with other operators and avoiding any collusive or unlawful practice and/or conduct aimed at commercial strategies that may negatively impact the market and consumers.

The Group is committed to combatting any form of illegitimate restriction of competition, through its own application of applicable regulations, and performing prior checks on the reliability and reputation of potential commercial partners.

The CAME Group is also committed, in application of applicable legislation, to respecting the rights of others over intangible assets subject to industrial and/or intellectual property protection.

Employees and external personnel of the Group are therefore required to:

- refrain from any conduct that may represent a violation of rights over brands, drawings, utility models, patents and authorship of third parties
- avoid conduct that may represent unfair competition.

## 18. Conflicts of interest

The CAME Group respects the right of its employees to participate in business, make investments and perform activities outside the context of their work, providing that these activities are performed in accordance with applicable laws and that they do not violate the contractual obligations upon them in relation to the Companies of the CAME Group.

In this context, all employees must avoid and refrain from promoting or in any case partaking in initiatives in which their personal interests or those of third parties are in conflict with the interests of the Group. A conflict of interests is understood as any situation in which personal interests or activities interfere with the interests of the CAME Group.

On this basis, each employee is required to:

- report to their department manager any specific situations or circumstances that, even partially, may lead to a conflict of interests
- avoid participating in decision-making or management processes regarding organisations in which they or a family member have a personal interest
- not use information gained through their role of function within the Group companies to their own advantage or to the advantage of third parties
- refrain from seeking personal benefit and/or benefit for third parties, in the form of business opportunities or other economic advantages, which they become aware of in performance of their function
- refrain from unlawful exploitation, to their own benefit and/or to the benefit of third parties, of the name and reputation of the Group companies.

## 19. Transparency and information traceability

Truthfulness, accuracy, traceability, completeness and clarity of information in accounting are fundamental values for the Group, also to guarantee shareholders and third parties access to a clear and accurate overview of the economic, equity and financial circumstances of the business.

The Group has defined the methods for filing of documentation regarding its business, in order to ensure traceability, verifiability and documentability of data, transactions and information generated, also dividing and separating roles and identifying responsibilities.

In order to maintain the reliability of communications of the Group Companies, safeguarding the correct and truthful presentation of economic, equity and financial results of the entire Group, and guaranteeing that overall the activity performed is aligned with the organisational structure and internal division of responsibilities, as well as being aligned with applicable laws and regulations, each employee is required to:

- collaborate with the aim of correct reporting of all business activity
- store, in line with criteria ensuring easy access, the supporting documentation for business activity
- promptly inform department managers of any omissions, serious oversights or falsifications in accounting and/or documentation on which the accounts are based.

## 20. Relations with institutions

The CAME Group undertakes to promote and support relations with the public administrations on the basis of principles of fairness, integrity, transparency and legality, establishing relations founded on collaboration and active cooperation.

For the purposes of this Code, the term public administrations is understood to refer to any public body, supervisory authority, independent administrative authority, public-safety authority, in Italy or abroad, EU and supra-national institutions and other organisations representing collective interests, holders of concessions for public services and public entities in general.

To this end, all Recipients of this Code, in relations with national and international public administrations, undertake to:

- operate in accordance with the law and company procedures and ethics
- refrain from conduct or attempted conduct that may represent corruption and involve criminal offences, with particular regard to crimes in relations with public administrations
- refrain from any conduct aimed at positively or negatively impacting part of a civil, criminal or administrative proceeding, and gaining direct or indirect advantage for Group companies
- not to mislead, with deception or tricks aimed at gaining unfair profit for the Group with damage to another party (this unfair profit may include contributions, financing or other issues of any type, by the state, a public entity or the European Union)
- not make, induce or favour false statements or those which are not wholly truthful
- have relationships exclusively within the limits of the assigned role and only where authorised, in accordance with the system for delegation of powers and powers of attorney defined by the Group
- refrain from in any way altering the operation of an IT or telecommunications system or unlawfully tampering by any method with data, information or programmes contained in an IT or telecommunications system or part of such systems causing damage to the state or a public entity or the European Union (“IT system” is understood to include a set of equipment destined for any function useful to people through the utilisation of it).

In any case, relations with public administrations are founded on full collaboration, having in any case to avoid hindering their activity, and are conducted preserving, in relations with public administrations, correct areas of mutual independence, avoiding any action or conduct that may be interpreted as an attempt to improperly influence decisions.

## **21. Combatting corruption**

In line with the values of legality, fairness, transparency and integrity, and in the belief that forms of corruption are damaging for economic development, growth of business activity and the reputation of the companies, the CAME Group, in performance of its activities and in relations with public administrations and private parties, promotes and spreads awareness of the importance of working to combat all forms of corruption.

With the goal of preventing actions that may, even potentially, represent forms of corruption, in the operations of Group Companies, the CAME Group has defined:

- systems for delegation of powers and powers of attorney
- a clear system for the segregation of roles and responsibilities
- mechanisms aimed at determining the methods of implementation of decision making with a view to traceability, verifiability and documentability of process phases
- appropriate measures for storage and traceability of operations and transactions
- procedures aimed at verifying and ensuring the reliability and reputation of potential commercial partners.

In accordance with applicable laws and the ethical principles and values set out in this document, the Recipients of this Code undertake to:

- manage relations with public administrations only following authorisation with assignment of powers or powers of attorney
- document and track, with appropriate evidence, all formal communications and documentation regarding relations with public administrations and private parties, enabling verification and establishment of exchanges
- refrain, during business negotiations or requests or relations, from inappropriately influencing the decisions of the other party, including those of officers that negotiate or take decisions on behalf of public administrations
- refrain from offering, promising or providing free items, gifts or benefits of any kind to natural or legal persons acting under the control or on behalf of public administrations, or their family members, directly or through intermediaries
- refrain from applying pressure to natural or legal persons acting under the control or on behalf of public administrations, or their family members, to induce, facilitate or remunerate a decision, the performance of an official procedure or an action that contradicts the official duties of public administrations
- inform the relevant department manager, the supervisory body, and potentially the competent authorities, and immediately suspend relations, in the event of explicit or implicit requests for benefits of any nature from parties acting under the control or on behalf of public authorities
- not accept from third parties any economic benefits, free items, gifts or other benefits that may be understood as payment for facilitating the improper performance of an activity
- inform the relevant department manager or appointed party in the event of receipt from a third party of an offer or request for benefits
- inform the supervisory body regarding the launch of the most significant operational relations of CAME Group companies with public administrations or natural or legal persons acting under the control or on behalf of public administrations, as well as continuation and conclusion of such activity.

Free items, gifts and acts of courtesy and hospitality are permitted only where these are of modest value, in accordance with standard business relations, such as to avoid compromising the integrity, image or reputation of CAME Group Companies and in any case such that they may not be interpreted as aimed at obtaining an improper advantage. In any case, any free items, gifts or benefits permitted must always be accompanied by written justification, with a statement indicating the identity of the recipient, and duly recorded.

In countries in which it is a custom to offer gifts to customers or other parties, it is possible to partake in such customs providing the gifts are of an appropriate nature and modest value, and in any case within the limits set out above, and always in accordance with applicable local laws.

In any case the CAME Group operates through promotional procedures overseen by the competent functions, and avoids all conduct and practices that are not permitted by law, standard commercial practices and the Codes of Ethics, where available, of organisations, also of a public nature, which it has relations with.

## **22. Relations with the local community**

In line with principles of collaboration and cooperation, the CAME Group considers the ability to establish lasting relationships with the communities in which it operates to be of primary importance. Through such relationships it is possible to implement development projects, with shared values and ethical principles.

With this outlook, in planning and organisation of activities, the Group always takes into consideration the potential environmental and social impacts that may be generated by its operations.

In addition, with the aim of contributing to sustainable growth, the Group develops and supports various projects with local communities in order to promote activities that lead to improvement of economic and social conditions in the areas in which it operates.

The Group, where it considers it to be necessary and aligned with applicable regulations and company procedures, may support programmes run by public bodies and aimed at serving and benefitting the community as a whole.

## **23. Protecting privacy**

In performance of its activity, in compliance with data-protection regulations, the Group ensures protection of data, safeguarding the confidentiality of personal data and information gathered.

To this end, the Group Companies protect the right to privacy of employees, external personnel, suppliers, customers, commercial partners and any other third parties with which they have relations, defining specific procedures, including IT procedures, and adopting specific measures to guarantee confidentiality, traceability, integrity and storage of data and information handled.

In this context, the Recipients of this Code undertake to:

- adopt the utmost care and act in accordance with applicable legislation and internal procedures for the gathering, storage, use, distribution and processing of personal data
- process personal data only for the purposes specifically authorised
- guarantee storage of data in line with the methods defined by applicable laws and internal procedures established by the Group companies to guarantee data integrity and traceability.

## **IV. ENVIRONMENT**

### **24. Environmental protection**

In the context of its operations, the CAME Group draws on the principle of respect for and safeguarding of the environment and pursues the goals of guaranteeing the health and safety of Recipients by adopting all relevant measures defined by law.

The activities of the CAME Group Companies are managed in accordance with applicable regulations on environmental prevention, protection and impacts, with adoption of technical and organisational tools to safeguard the environment.

The Group's commitment to protecting the environment is implemented through constant improvement regarding correct consumption of energy resources and raw materials, minimising waste, and seeking new technology capable of reducing the environmental impact of the Group's operations.

In this context, the Group establishes internal procedures defining criteria for the determination of environmental factors connected to operations, products and services, with the goal of highlighting possible improvement actions.

The commitment of the CAME Group to protect and safeguard the environment is also implemented through the study, research and development of products with a low environmental impact, considering their entire life cycle, from extraction of raw materials to their disposal. A detailed study into the environmental impacts of services and products enables the Group not only to develop products that meet sustainability criteria but also to clearly and transparently communicate information on the environmental performance of products.

The CAME Group also offers support and promotional activity and raises awareness amongst employees, external personnel, suppliers and commercial partners, also through the performance of specific environmental audits, regarding the importance of acting sustainably, minimising environmental impacts and thus protecting and preserving the environment in which it operates.

To this end, the Group considers it fundamental that Recipients of this Code undertake to:

- operate responsibly and in accordance with internal procedures and application legislation on environmental protection
- promptly report to the relevant corporate function any potential risk to the environment or to people's health and safety
- actively participate in risk-prevention and environmental-protection processes, as well as training courses and skills-updating activity organised by the Group.

## V. COMPANY RESOURCES

### 25. Use of company assets

The CAME Group guarantees the functionality, integrity and safety of its company assets through the implementation of internal procedures aimed at managing use, monitoring and maintenance.

When using tangible and intangible resources assigned to them, the Recipients, observing the provisions set out by internal procedures, undertake to:

- use assets diligently and guarantee their integrity, without modifying them and keeping them in good condition
- protect and safeguard the Group's information assets, also acquired via it systems
- use assets solely and exclusively in the interests of the Group companies
- monitor the functioning of assets assigned and if any anomalies are identified, inform the company department responsible
- promptly report to the responsible company department and situation that may represent a hazard to people and/or the environment.

## **26. Protection of industrial and intellectual property**

Research and innovation are essential for the achievement of the CAME Group's corporate aims. The Group considers it fundamentally important to invest in research and development for new ideas and projects to create technologically state-of-the-art products. For this reason, the Group defines measures to protect its industrial and intellectual property rights over original works, which represent invaluable assets for the Group Companies.

On this basis, the Recipients of this Code undertake to:

- refrain from conduct that may compromise industrial and/or intellectual property rights over original works of the Group (brands and patents)
- not use or distribute confidential information of the CAME Group without specific authorisation from those responsible for such information
- report to their line manager any violation or potential violation of the Group's industrial and/or intellectual property rights.

## **27. Protecting image and reputation**

Protection of the company's image and reputation is a decisive factor for the safeguarding of relationships and relations of the CAME Group with its stakeholders. For this reason, the Group considers it fundamentally important that its employees and external personnel perform their work in accordance with the ethical principles and values set out in this Code.

To this end, the Recipients of this Code undertake to:

- inform the company departments responsible of any requests for information from the press or mass media
- refrain from any conduct that breaches applicable legislation and ethical values and principles in the name and on behalf of the Group companies
- refrain from spreading news or information about the Group without prior and specific authorisation from the company departments responsible for such information.

## **VI. FINAL PROVISIONS**

### **28. Disciplinary System**

The CAME Group considers an essential component of a relationship of trust with its employees to be the awareness and application of specific rules for individual's activities and observance of applicable laws and regulations, in addition to the provisions contained in the Code of Ethics and other codes of conduct adopted.

Observance of the rules in the Code of Ethics must be considered an essential component of the contractual obligations of employees pursuant to and for the purposes of art. 2104 of the Italian Civil Code. Breaches of the rules of the Code may represent failure to fulfil the primary obligations of the employment relationship or a disciplinary offence, in accordance with the procedures set out by art. 7 of the Workers' Statute, with all legal consequences, also regarding maintenance of the employment relationship, with the principle of proportionality, and may lead to related claims for damages.

In relation to external personnel, suppliers, commercial partners and any party that has business relations with the CAME Group, observance of the Code of Ethics must be considered an essential component of their contractual obligations. Therefore, breaches of the rules in the Code of Ethics may represent a breach of contractual obligations, with all legal consequences, also regarding termination of the contract and/or appointment, and may lead to related claims for damages.

## 29. Whistleblowing

Each Recipient of this Code undertakes to promptly report any conduct that may represent a serious irregularity or breach of internal procedures, laws and applicable regulations, the provisions of the Code of Ethics and the Organisation, Management and Control Model, which they have become aware of attributable to directors, employees or external personnel of the CAME Group.

The CAME Group, in application of the internal procedures adopted for this purpose, manages reports received guaranteeing the correct application of applicable regulations protecting the integrity, confidentiality and traceability of data relating to reports.

All Recipients of the Code of Ethics are also requested to cooperate with internal investigations into breaches and conduct that is not aligned with this Code of Ethics.

The CAME Group has established the following reporting channels:

- Whistleblowing portal at the following link: <https://came.integrityline.com/>
- E-mail: [whistleblowing@CAME.com](mailto:whistleblowing@CAME.com)
- Post to the address of the CAME Whistleblowing Committee: Via Martiri della Libertà, 15, 31030, Dosson di Casier (TV), Italy.

The Group applies disciplinary measures to any party taking action for retribution and/or discrimination of individuals who, in good faith, have submitted or intend to submit reports regarding unlawful conduct and/or conduct that breaches the ethical value and principles set out in this Code of Conduct. The disciplinary system will also be applied to those who, through wilful misconduct or gross negligence, submits a report regarding unlawful and/or irregular conduct that is later discovered to be unfounded.

**CAME** 

**CAME S.P.A.**

**Corporate Headquarters**

Via Martiri della Libertà, 15

31030 Dosson di Casier (TV) - Italy

Tel: +39 0422 4940 | [info@came.com](mailto:info@came.com)

