

Riveco GeneralSider S.p.A.



Code of ethics

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PREMISE

0.1 Objectives

Riveco GeneralSider S.p.A. is conscious of contributing with its work, with its sense of responsibility and moral integrity, to the developing process of Italian economy and civil growth of the country.

La Riveco GeneralSider S.p.A. believes in value of work considering legality, correctness and transparency of acting as essential prerequisites for achieving its economic, productive and social objectives.

0.2 Adoption

This Code of Ethics was adopted by Riveco GeneralSider S.p.A. with determination of the Sole Director.

Riveco GeneralSider S.p.A. established the following set of rules through adoption of the said Code:

- behaving in relations with external interlocutors, collaborators, market and environment, to which Riveco GeneralSider S.p.A. informs about its internal and external activities, requiring compliance from all collaborators, consultants and, to the extent of their competence, external interlocutors;
- organizing and managing Riveco GeneralSider S.p.A. aimed to create an efficient and effective system of planning, execution and control of activities such as to ensure constant compliance with the rules of conduct and prevent their violation by any person who works for Riveco GeneralSider S.p.A.

0.3 Diffusion

The Code has been widely distributed internally and is available to any interlocutor of Riveco GeneralSider S.p.A.

The Code of Ethics is published on the company website www.rivecogeneralsider.it.

Each employee of Riveco GeneralSider S.p.A. is required to know and comply with the provisions of the Code.

Riveco GeneralSider S.p.A. carefully monitors compliance with the Code, providing adequate information, prevention and control tools and intervening, if necessary, with corrective actions.

0.4 Update

This Code can be amended and supplemented by resolution of the Administrative Body of Riveco GeneralSider S.p.A., also on the basis of suggestions and indications from the Supervisory Body.

PART I

Ethical principles

1.0 Reference principles

Riveco GeneralSider S.p.A. adopts loyalty, respect for the person, transparency in activities, refuses corruption and unfair competition and embraces absolute compliance with the laws and regulations in force in area in which operates as its reference principles.

1.1 Honesty and fairness

The pursuit of the interest of Riveco GeneralSider S.p.A. can never justify a behaviour contrary to the law, the principles of correctness, honesty, loyalty and mutual respect.

1.2 Transparency

Riveco GeneralSider S.p.A. carries out its business in the name of transparency, both in internal business management and in tasks assignment and responsibilities, and in relations with customers, suppliers and external collaborators.

1.3 Confidentiality

Riveco GeneralSider S.p.A. guarantees the information confidentiality and processed personal data and the protection of the information acquired in relation to the work performed by conforming to the national and EU regulatory requirements regarding the confidentiality of personal data and internal procedures on the use of IT system and the confidentiality of company data and information.

1.4 Fight against corruption and conflicts of interest

Riveco GeneralSider S.p.A. undertakes to implement all the measures necessary to prevent and avoid corruption and conflict of interest.

1.5 Correctness in management of contracts with third parties

Riveco GeneralSider S.p.A. strives to ensure that contracts stipulated with its suppliers and customers are carried out in accordance with what is consciously and freely established by the parties.

1.6 Competition

Riveco GeneralSider S.p.A. recognizes that a competition is a fundamental element for the development and economic and social progress of the country and ensures that the general conditions for business freedom are respected allowing economic operators to be able to access the market and compete with equal opportunities, and this protects its customers favouring the containment of prices and improvements in the quality of services deriving from the fair play competition.

1.7 Impartiality

Riveco GeneralSider S.p.A. avoids any discrimination based on age, sex, state of health, ethnicity, language, sexual orientation, personal beliefs, nationality, political opinions and religious beliefs of its interlocutors, on possible membership or non-adhesion to labour union association or on the possible retreatment from it, as well as any discrimination based on the condition of people with disabilities.

1.8 Environment, health, hygiene and safety

Riveco GeneralSider S.p.A. undertakes to comply with all regulatory provisions that allow protection of the health of workers at workplace, through the company department activities responsible for this and as required by law regarding environmental protection.

PART II

Rules of conduct

Section I

Relation with external

2.1 Relations with external interlocutors

The relationship of Riveco GeneralSider S.p.A. with any interlocutor, public or private, must be conducted in compliance with the law and in compliance with the principles of correctness, transparency and verifiability.

In particular, relations with representatives, officials or public employees must comply with the principles and provisions indicated by the Decree of the President of the Republic of 16th April 2013, nr. 62 (Code of conduct for employees of public administrations) and subsequent amendments and additions.

No form of gift is admitted to representatives, officials or employees of public administrations that may even appear to exceed normal commercial or courtesy practices, or in any case aimed at acquiring favourable treatment conducting of any activity and research and establishment of personal relations of favour, influence, interference suitable to condition, directly or indirectly, the outcome of the relationship. It is also forbidden to offer goods or other benefits to representatives, officials or employees of public bodies, even through third parties, except in the case of gifts of modest value and in accordance with custom and as long as they cannot be understood as aimed at seeking undue favours.

Riveco GeneralSider S.p.A. does not provide contributions, advantages or other benefits to political parties and workers' labour unions, or to their representatives, except in compliance with applicable legislation.

La Riveco GeneralSider S.p.A. refrains from submitting to any pressure, direct or indirect, carried out by politicians or members of trendy associations and does not accept reports from them for hiring, nor does sign any consultancy contracts with them.

2.2 Relations with customers and clients

Riveco GeneralSider S.p.A. bases its business on the principal of quality, essentially intended as the goal of fully satisfaction of the customer.

Riveco GeneralSider ensures fairness and clarity in commercial negotiations during the relations with customers and in the assumption of contractual obligation, as far as a faithful and diligent contractual fulfilment.

Participating in tenders Riveco GeneralSider S.p.A. evaluates carefully appropriateness and feasibility of required services, with particular regard to the technical and economic conditions, safety and environmental aspects detecting promptly any anomalies, where possible.

The formulation of offers will be such as to allow compliance with adequate quality standards, congruous remuneration levels for employees, current safety and environmental protection measures.

Riveco GeneralSider S.p.A. undertakes to maintain total confidentiality on confidential information concerning its customers and ensures that this information is used only for strictly professional reasons and in any case following a written authorization. Customers are also required to ensure the confidentiality of information, documents, personal data relating to Riveco GeneralSider S.p.A. and its staff.

Riveco GeneralSider S.p.A. prohibits its collaborators from receiving or offering gifts and / or benefits or other utilities from / to customers, such as to determine unlawful conduct except for the hypothesis of gifts or forms of hospitality, if they comply with company procedures.

La Riveco GeneralSider S.p.A. appeals to litigation only when its legitimate claims do not find due satisfaction with the interlocutor.

It shall be always avoided situation while conducting any negotiations in which the subjects involved, in the transactions are or may appear being in conflict of interest.

2.3 Relations with suppliers

The relations with suppliers, contractors or subcontractors of Riveco GeneralSider S.p.A., including financial and consultancy contracts, are governed by the rules of this Code and are subject to constant and careful monitoring by Riveco GeneralSider S.p.A.

Riveco GeneralSider S.p.A. avails of suppliers, contractors or subcontractors who operate in compliance with current legislation and the rules set out in this Code.

Riveco GeneralSider S.p.A. in relations with suppliers, contractors or subcontractors observes the applicable legal provisions and contractual conditions and it adheres strictly to internal procedures relating to the selection and management of relations with suppliers.

Riveco GeneralSider S.p.A. undertakes to obtain the cooperation of suppliers, contractors or subcontractors in ensuring the satisfaction of the needs in terms of quality, safety and delivery times of goods or services, to observe the principles of transparency and completeness of information in correspondence with suppliers, contractors or subcontractors and to avoid being subjected to any form of conditioning by suppliers, contractors or subcontractors for taking decisions and / or the execution of acts relating to their work.

Riveco GeneralSider S.p.A. expects from its suppliers, contractors or subcontractors to behave correctly, diligently and in compliance with the provisions of the law, with particular attention to compliance with regulations and good practices regarding ethics, protection of health and safety at workplace, of environment, of regularity of contributions of the staff employed, and compliance with the laws in force on the subject of receiving and recycling and protection of intellectual property.

Riveco GeneralSider S.p.A. undertakes to maintain total confidentiality on information regarding its suppliers, contractors or subcontractors and to use this information only for professional reasons and following written authorization.

Suppliers, contractors or subcontractors are required also to ensure the confidentiality of information, documents and personal data relating to Riveco GeneralSider S.p.A. and its collaborators.

Riveco GeneralSider S.p.A. prohibits its collaborators from receiving or offering gifts and / or benefits or other utilities from / to potential or actual suppliers, contractors or subcontractors, such as to lead to unlawful conduct except for the hypothesis of gifts normally offered to all those who entertain the same type of relationship with that supplier, contractor or subcontractor.

The remuneration to be paid to suppliers, contractors or subcontractors must be exclusively related to the service defined in contract and payments cannot be made to other person than the contractual party.

Riveco GeneralSider S.p.A. brings contents of this Code to attention of suppliers, contractors or subcontractors by publishing it on the institutional website www.rivecogeneralsider.it.

2.4 Relations with media

Riveco GeneralSider S.p.A., through all its employees and external collaborators, is committed to ensure that the company's image appears with the prestige and importance to the role playing on the reference market.

Relations with the media are reserved exclusively for the corporate functions and responsibilities delegated to perform and are agreed with them previously.

The employees and external collaborators of Riveco GeneralSider S.p.A. cannot provide information or opinions and issue statements on behalf of the company to representatives of the media (such as the press, television, radio, etc.), nor undertake to release them without any necessary delegation of such a competent function.

In no way or form, the employees of Riveco GeneralSider S.p.A. may offer payments, gifts or other benefits aimed at influencing the professional activity of the functions of the media.

Section II

Relations with collaborators

2.5 Work

Riveco GeneralSider S.p.A. recognizes the centrality of human resources, as the main factor of success of every company, in a framework of mutual loyalty and trust between employer and employee.

All staff are employed by Riveco GeneralSider S.p.A. with a regular employment contract.

The employment relationship is carried out in compliance with the collective contractual regulations of the sector under social security, tax and insurance regulations.

Riveco GeneralSider S.p.A. favours a continuous improvement of professionalism of its employees, also through the development of training initiatives.

Riveco GeneralSider S.p.A. acts in its business activities respecting the fundamental rights of each individual, protecting its moral integrity and ensuring equal opportunities.

Riveco GeneralSider S.p.A. wishes to maintain a peaceful working environment inside the company, in which everyone can work in compliance with the laws, principles and shared values, not tolerating any form of isolation, exploitation or harassment for any cause of discrimination, for personal or work reasons.

It is expressly prohibited any kind of discrimination in the company.

Riveco GeneralSider S.p.A. does not use child or forced labour, nor has it entered into or enters into contracts with suppliers or subcontractors who use it.

2.6 Safety and health

Riveco GeneralSider S.p.A. guarantees the physical and moral integrity of its collaborators, working conditions that respect individual dignity and safe and healthy working environments, in full compliance with current legislation on accident prevention and protection of workers at workplace.

Riveco GeneralSider S.p.A. carries out its activity under technical, organizational and economic conditions which allow adequate accident prevention and a healthy and safe working environment to be ensured.

Riveco GeneralSider S.p.A. undertakes to spread and consolidate a culture of safety among all its employees and collaborators, developing awareness of risks and promoting responsible behaviour among all involved parties.

2.7 Environment

La Riveco GeneralSider S.p.A. is committed spreading and consolidating a culture of environmental protection and pollution prevention among all its employees and collaborators, developing awareness of risks and promoting responsible behavior between all collaborators.

PART III Methods of implementation

3.1 Prevention

Riveco GeneralSider SpA adopts organizational and management measures suitable for preventing illegal behavior or in any case contrary to rules of this Code by any person acting on its behalf in compliance with current legislation and with a view to planning and managing company activities aimed at efficiency, correctness, transparency and quality.

Due to joint activities and the organizational complexity, Riveco GeneralSider S.p.A. adopts a system of delegation of powers and functions, providing in explicit and specific terms the assignment of tasks to personnel with suitable skills and competence.

Relating to the extension of delegated powers, Riveco GeneralSider S.p.A. adopts and implements an organization and management model which provides for suitable measures ensuring performance of activities in compliance with the law and the rules of conduct of this Code, promptly discovering and eliminating risk situations.

3.2 Inspections

La Riveco GeneralSider S.p.A. adopts specific methods of checking the compliance of behavior of the recipients of this Code, with the provisions of current legislation and the rules of conduct of this Code.

3.3 Sanctions

Compliance by the employees of Riveco GeneralSider S.p.A. of the rules of the Code must be considered an essential part of the contractual obligations pursuant to art. 2104 of the Italian Civil Code.

The violation of the rules of the Code by employees may constitute a breach of the primary obligations of the employment relationship or a disciplinary offense, with all legal consequences.