



CODICE ETICO

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Approved by the Management on 08/08/16

PURPOSE AND SCOPE OF THE CODE

The intent of the Code of Ethics is to spread, internally and externally, a culture of legality and



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correctness in the performance of services and activities, defining a risk management and control system, which can prevent different situations and contribute to improving performance administrative, qualitative, environmental, ethical and safety aspects of the organization.

The principles expressed here are translated into requirements that are collected in the organization's Integrated Management System (IMS) (ISO 9001 + ISO 14001 + SA 8000 + Management Model pursuant to Legislative Decree 231/01).

In response to the principle of improvement of the IMS, ARREDOLEGNODESIGN S.r.l., evaluates and systematically reviews its performance in achieving the set objectives.

The field of application is all ARREDOLEGNODESIGN S.r.l., its operational and administrative processes, the related fixed workplaces and construction sites, equipment and all personnel regardless of the type of contract that binds it to ARREDOLEGNODESIGN S.r.l.

This applies to external subjects who have relationships with the organization, especially to those organizations that find themselves working as outsourcing, in the ways and terms defined within the Code itself.

HOW TO MANAGE THE CODE

Adoption

The Code of Ethics is approved by ARREDOLEGNODESIGN S.r.l. on the date indicated on the title page and considered as an "internal regulation".

The subjects who intend to be part of ARREDOLEGNODESIGN S.r.l. they declare that they know and accept the present in full by signing it.

The subjects who are already part of ARREDOLEGNODESIGN S.r.l. have two months, from the above date, to forward to ARREDOLEGNODESIGN S.r.l. full acceptance of this.

ARREDOLEGNODESIGN S.r.l. establishes the following strategic rules:

ARREDOLEGNODESIGN S.r.l. does not start or continue any relationship with collaborators, consultants and external subjects who do not respect the rules expressed in the present;

ARREDOLEGNODESIGN S.r.l. maintains an effective and efficient organization and management that ensures compliance with the rules of conduct and prevents violation of the laws and established rules.

Non-acceptance or non-compliance with the Code of Ethics is a reason for exclusion from relations with ARREDOLEGNODESIGN S.r.l.



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Spread

ARREDOLEGNODESIGN S.r.l. undertakes to highlight the Interested Parties that there is an internal organizational model.

The Code of Ethics is public, is displayed on the bulletin board, is being trained and can also be published on the internet.

The Code of Ethics is delivered to all external subjects who in any way can contribute to corporate risk, as this is assessed in the specific SGI documents referred to.

It is also delivered to management staff, any ATS members, new hires, etc.

ARREDOLEGNODESIGN S.r.l. will clarify any doubts relating to the Code of Ethics and the SGI.

Update

This Code of Ethics has no time limit and is updated as needed.

Changes and additions to the Code of Ethics are released by the Property, also following suggestions from the Supervisory Body (SB).

The subject that manages the Code of Ethics and the SGI is the Management.

Normative requirements

This Code of Ethics refers to the "Confindustria Guidelines for the construction of organization, management and control models pursuant to Legislative Decree 231/2001" published by Confindustria.

This Code of Ethics reports the management policies relating to quality, the environment and ethics in compliance with the international standards ISO 9001, ISO 14001, SA 8000.

RELATIONS WITH STAKEHOLDERS

Relationship with internal interested parties

Each recipient of the Code must know the prescribed rules and comply with them. He must also report any violations of them in any of the areas indicated below and collaborate with the persons in charge of managing the IMS and managing internal control. The company considers human resources to be its most important resource, it undertakes to respect its rights just as everyone recognizes their duties; relations between the parties are dictated by the ethical principles indicated in Chapter 4 below.

Accounting transparency

All the accounting records of ARREDOLEGNODESIGN S.r.l. they are transparent, truthful, detailed and complete. ARREDOLEGNODESIGN S.r.l. guarantees a reliable representation of



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the economic, equity and financial situation, in internal documents, in the financial statements and in communications.

All supporting documentation is traceable, consistent with each accounting entry.

All employees and collaborators are required to collaborate in the correct provision of the data necessary for the company's accounting

Internal resources

Each employee is responsible for the resources assigned to him and no one can make an improper and / or different use from that intended.

Relationship with external interested parties

ARREDOLEGNODESIGN S.r.l. respects the rules of correctness, transparency, and verifiability in relations with all external interested parties.

Relations with the Public Administration, or any other person representing collective interests, are delegated exclusively to the Property.

Relationship with the end user

ARREDOLEGNODESIGN Srl, regardless of the type of customer, whether private, company and / or public, respects the rules of transparency and commercial correctness, pursues the continuous improvement of the quality of its processes and guarantees the quality level and performance of its service as well as established by orders, specifications, standards, applicable laws.

Relationship with suppliers

This Code of Ethics applies to all suppliers, be they of materials and services, including technical and economic-financial consultancy, assembly services.

All suppliers and their supplies are checked.

Everything is monitored and submitted to the Management.

The prescriptions indicated in this Code of Ethics represent general contractual prescriptions in any supply contract.

Each supplier deemed strategic by the Management receives this Code of Ethics and undertakes to respect its principles by signing it. Vice versa, ARREDOLEGNODESIGN S.r.l. does not begin or continue any relationship with suppliers who do not comply with these principles and prescriptions. Failure to comply with these provisions therefore represents a contractual breach.



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STANDARD OF BEHAVIOR

Work

There is the presence of employees and outsiders.

Employees are hired with a regular employment contract.

The employment relationship takes place in compliance with collective bargaining regulations and social security, tax and insurance legislation.

All personnel, as indicated in the company organization chart, the staff of the structure and external suppliers, in carrying out their duties must ensure that each operation is correctly recorded, verifiable, coherent and congruous, as prescribed in the system documentation . They must also comply with safety and health regulations in the workplace, privacy and protection of personal data and comply with the principles and objectives defined in terms of respect and improvement of the environment.

Disclosure obligations

All those who are part of ARREDOLEGNODESIGN S.r.l. they collaborate to provide clear and complete information and to conduct behavior based on principles of fairness and transparency.

Each transaction of economic and non-economic significance is adequately recorded so that it can be verified at any time.

The Management ensures the functioning of the structure's bodies in compliance with the provisions of the law and the articles of association.

All managerial and operational functions lend maximum collaboration to the SB which is entitled to request information or documentation.

Quality (Quality Policy)

The main strategic objective of ARREDOLEGNODESIGN S.r.l. is the constant and continuous supply of high quality services accompanied by equally high quality products. This is achieved thanks to the increasing interest placed by the organization in identifying and satisfying the requirements and expectations of the customer, both those expressed and those not expressed and the achievement of a primary reputation for quality.

To maintain reliability and remain on the market, ARREDOLEGNODESIGN S.r.l. offers a competitive service. It therefore becomes necessary to pursue continuous improvement in professionalism, effectiveness and efficiency, constantly measuring and confronting ourselves with clear and tangible objectives.



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ARREDOLEGNODESIGN S.r.l. considers strategic:

- Create and maintain awareness throughout the organization of the importance of meeting the needs of the customer and all interested parties;
- Promote risk management within the company by preventing potential hazards and non-conformities;
- Promote, empower and support the personal development of employees and all company roles;
- Provide continuous assistance during the provision of the service;
- Inform and train staff on the philosophy of quality;
- Promote the contribution of all company figures for the effectiveness of the system;
- Inform and train staff on the implications that arise from not complying with the principles and requirements laid down;
- Respect the laws in force and the regulations;
- Promote and disseminate continuous quality improvement;
- Measure the adequacy and effectiveness of the Management System by periodically reviewing it;
- Have periodic data and analyzes;
- Obtain a satisfactory economic result.

Social Responsibility (Social Responsibility-Ethics Policy)

ARREDOLEGNODESIGN S.r.l. not only has the primary objective of achieving high levels of qualitative and environmental performance, but also that of maintaining pro-active behavior in the field of Social Responsibility - Ethics.

ARREDOLEGNODESIGN S.r.l. guarantees:

- Physical and moral integrity of its collaborators and employees;
- Maintaining working conditions that respect individual safety and dignity;
- Safe and healthy work environments, infrastructures and instrumental resources.

ARREDOLEGNODESIGN S.r.l. aims at its business profit with activities that represent an advantage for the interested parties to the business, applying the best available and economically viable technologies, in compliance with the laws of the Italian State and, where more rigorous, the following:

- ILO Convention 1 (Hours of Work - Industry) and Recommendation 116 (Reduction of Hours of Work);
- ILO Conventions 29 and 105 (Forced & Slavery Work);
- ILO 87 Convention (Freedom of Association);
- ILO 98 Convention (Right to Collective Exchange);
- ILO 100 and 111 conventions (Fair remuneration for men and women for equal work; value; Discrimination);
- ILO Convention 102 (Social Security - Minimum Standards);
- ILO Convention 131 (Minimum Wage Fixing);
- ILO 135 Convention (Convention of Workers' Representatives);
- ILO 138 Convention & Recommendation 146 (Minimum Age);
- ILO Convention 155 & Recommendation 164 (Occupational Health & Safety);



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- ILO 159 Convention (Professional Rehabilitation & Employment / Disabled People);
- ILO Convention 169 (Indigenous and Tribal Peoples);
- ILO 177 Convention (Housework);
- ILO Convention 181 (Private Employment Agencies);
- ILO Convention 182 (discrimination against women);
- ILO Convention 183 (Maternity Protection);
- ILO Code of Practice on HIV / AIDS and the World of Work;
- The International Covenant on Economic, Social and Cultural Rights;
- The International Covenant on Civil and Political Rights;
- The United Nations Convention on the Elimination of All Forms of Discrimination Against Women;
- The United Nations Convention on the Elimination of All Forms of Racial Discrimination;
- UN Guiding Principles on Business and Human Rights;
- Universal Declaration of Human Rights;
- The United Nations Convention on the Rights of the Child;

In the course of its foreign business, the organization undertakes to comply with its laws, if more stringent than the aforementioned.

The organization undertakes to comply, not with limitation, with the following laws and regulations:

- D.L. 345/99, on child labor;
- Legislative Decree 81 and subsequent amendments about security;
- EEC Recommendation of 27/11/1991, on the protection of the dignity of work;
- Article. 2106 of the Civil Code and art.7 of the Workers' Statute, on disciplinary practices;
- C.C.N.L.

It also undertakes:

- for the protection of minors and young workers;
- not to use and / or not in any way favor any form of forced labor;
- for the health and safety of workers and the workplace;
- for freedom of association and for the right to collective bargaining;
- to avoid any form of discrimination;
- for a correct and shared use of disciplinary practices;
- in applying permitted working hours;
- in applying recognized and agreed remuneration criteria;
- to use an integrated management system that allows monitoring of its performance and continuous improvement.



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The goal is to develop, within the organization, a culture of ethics through tools such as prevention, awareness, the management system, system documents and staff training programs.

With the dissemination of this Code of Ethics, this policy on Social Responsibility-Ethics is also being disseminated

Environment (Environment Policy)

ARREDOLEGNODESIGN S.r.l. activities are conducted in compliance with current environmental legislation.

ARREDOLEGNODESIGN S.r.l. is committed to improving its environmental performance, minimizing, where technically possible and economically sustainable, any negative impact on the surrounding environment, seeking to reduce consumption and the production of waste.

ARREDOLEGNODESIGN S.r.l. defines objectives to be integrated with the operational management of its activities and constantly involves all levels of the organization through targeted training and training.

ARREDOLEGNODESIGN S.r.l. undertakes to make the whole organization aware of the need to obtain complete satisfaction of the needs of the market and the interested parties, offering a competitive service, in full respect of the environment. To this end, it applies principles and guidelines concerning respect for the surrounding and global natural environment. It therefore becomes necessary to continuously improve for the reduction of pollution and the protection of the environment, constantly measuring and comparing itself with clear and tangible objectives as well as shared with the interested parties.

ARREDOLEGNODESIGN S.r.l. works with every means at its disposal and as far as it can in order to:

- Individually empower employees;
- Where possible, seek the collaboration and sharing of all interested parties and in any case inform:
 - internal subjects, with adequate dissemination of information and training;
 - Members;
 - Customers;
 - Third parties such as Providers, Public institutions, Associations, The community in general;
- making its principles public.



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IMPLEMENTATION AND CONTROL SYSTEM

The principles of the Code of Ethics are among the conditions that regulate employment relationships.

Therefore, employees and managers who violate the provisions of the Code are subject to specific disciplinary sanctions, in full compliance with the law, of the C.C.N.L. and those specific category applicable.

ARREDOLEGNODESIGN S.r.l. , through the IMS, has defined a monitoring and traceability system for operations; all employees are responsible for the regular performance of the defined control system, within the scope of the functions performed.

The SB has the task of monitoring and evaluating control processes, managing risks and proposing countermeasures.

Any recipient who becomes aware of situations, even if only potentially illegal or contrary to the principles of the Code of Ethics, must immediately inform the SB.

Failure to comply with the duty of information can be subject to disciplinary sanction.

The reports received are treated by the SB with confidentiality, guaranteeing the anonymity of the reporting party.

The SB assesses the reports and any measures, listens to the author of the report and / or the person responsible for the violation and motivates his decisions in writing.

Any penalties are established on the basis of the disciplinary system envisaged by the IMS.