

ETHICAL CODE

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Approved by the Management on 18/06/20

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1. Purpose and scope of the code

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

The principles expressed here translate into requirements that are collect in the Integrated Management System (SMI) of the organization (ISO 9001 + ISO 14001 + SA 8000 + Management Model pursuant to Legislative Decree 231).

In response to the improvement principle of the SGI, ARREDOLEGNODESIGN S.r.l., systematically evaluates and re-examines its performance in achieving the set objectives.

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

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

2. How to manage the code

2.1 Adoption

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

The subjects who intend to be part of ARREDOLEGNODESIGN S.r.l. declare that they know and fully accept this by signing it.

The subjects who are already part of ARREDOLEGNODESIGN S.r.l. they have two months, from the aforementioned 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 initiate or continue any relationship with collaborators, consultants and external subjects who do not respect the rules expressed herein;

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

2.2 Diffusion

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

The Code of Ethics is public, is display on the notice board, is subject to training and can be publish on the internet.

The Code of Ethics is deliver to all external parties who in any way can contribute to the business risk, as this is assess in the specific documents referred to by SGI.

It is also deliver 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.

2.3 Update

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

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

The person who manages the Code of Ethics and the SGI is the Management.

2.4 Normative reference

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, environment, ethics in compliance with the international standards ISO 9001, ISO 14001, SA 8000.

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3. Relationship with diverse stakeholder

3.1 Relationship with internal interested parts

Each recipient of the Code must know the prescribed rules and respect 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 SGI and managing internal control. The company considers human resources to be its most important resource, and is committed to respecting their rights as everyone recognizes their duties; the relations between the parties are dictated by the ethical principles indicated in the following Chapter 4.

3.2 Transparent of accounting data

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 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 cooperate in the correct provision of the data necessary for the company's accounting.

3.3 Internal resources

Each employee is responsible for the resources assigned to him and no one can make a personal or improper and / or different use of them from that foreseen; resources include documents, information, data and all equipment and telematic systems, HW and SW: cards, personal computers, devices, etc. .. Each employee must have a conduct such as to prevent damage to internal resources and to those to which it has access.

3.4 Relationship with external interested parts

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 representative of collective interests, are entrusted exclusively to the Property.

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3.4.1 False declaration – facilitating

None of the top figures of Arredolegnodesign S.r.l. exerts any kind of pressure on subjects called to testify before the judicial authorities; furthermore, none of Arredolegnodesign S.r.l. it interferes with investigative activities in progress against its directors, managers, employees, suppliers and customers, nor does it help anyone to evade the investigations of the Authority or to evade its research.

3.4.2 Conflict of interest

Each employee, manager, director and consultant is required to have a conduct that, even potentially, does not create situations of conflict with the purposes and interests of the Organization and is required to report to the Organization any situations of possible incompatibility with the Administration. Public (and private entities under public control).

3.5 Relationship with final user

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

3.6 Relationship with supplier

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

All suppliers and their respective supplies are subject to checks.

Everything is monitor and submitted to the Management.

The requirements indicated in this Code of Ethics represent general contractual requirements 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. Conversely, ARREDOLEGNODESIGN S.r.l does not initiate or continue any relationship with suppliers who do not comply with these principles and prescriptions. Failure to comply with these requirements therefore represents a breach of contract.

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4. Standard of behaviour

4.1 Work

There is the presence of employees and outsiders.

Employees are hire with a regular employment contract.

The employment relationship is carry out in compliance with collective contractual regulations and social security, tax and insurance regulations.

All the staff, as indicated in the company organization chart, the collaborators 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 the requirements on safety and health in the workplace, privacy and protection of personal data and comply with the principles and objectives defined in terms of respect for and improvement of the environment.

4.2 Requirement of information

All those who are part of ARREDOLEGNODESIGN S.r.l. they collaborate to provide clear and complete information and to behave in accordance with the principles of correctness and transparency.

Each transaction of economic or non-economic significance is adequately record so that it can be check at any time.

The Management ensures the functioning of the bodies of the structure in compliance with the provisions of the law and the statute.

All management and operational functions lend their full cooperation to the Supervisory Body, which is entitled to request information or documentation.

4.3 Quality (Policy of Quality)

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 achieve thanks to the growing interest placed by the organization in identifying and satisfying the customer's requirements and expectations, both expressed and unexpressed, and the achievement of a primary reputation in terms of quality.

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

ARREDOLEGNODESIGN S.r.l consider 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 dangers and non-conformities;
- Promote, empower and support the personal development of employees and all company roles;
- Give 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 of not complying with the established principles and requirements;
- Comply with applicable laws and regulations;
- Promote and disseminate continuous quality improvement;
- Measure the adequacy and effectiveness of the Management System by periodically reviewing it;
- Have periodic data and analysis;
- Obtain a satisfactory economic result.

4.4 Social Responsibility (Policy of Social-Ethical responsibility)

ARREDOLEGNODESIGN S.r.l. its primary objective is not only the achievement of high levels of qualitative and environmental performance, but also that of maintaining a pro-active behaviour in the field of Social Responsibility - Ethics.

ARREDOLEGNODESIGN S.r.l. guarantee:

- Physical and moral integrity of its collaborators and employees;
- The maintenance of working conditions that respect individual safety and dignity;
- Safe and healthy work environments, infrastructures and instrumental resources for the prevention of work-related injuries and diseases;
- consultation and participation of workers.

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

- ILO Convention 1 (Hours of Work - Industry) and Recommendation 116 (Reduction of Hours of Work)
- ILO Conventions 29 and 105 (Forced Labor & Slavery)
- ILO Convention 87 (Freedom of Association)
- ILO Convention 98 (Right to Collective Exchange)
- ILO Conventions 100 and 111 (Equitable remuneration for men and women for peer jobs value; Discrimination)
- ILO Convention 102 (Social Security - Minimum Standards)
- ILO Convention 131 (Minimum Wage Fixing)
- ILO Convention 135 (Workers' Representatives Convention)
- ILO Convention 138 & Recommendation 146 (Minimum Age)
- ILO Convention 155 & Recommendation 164 (Occupational Health & Safety)
- ILO Convention 159 (Vocational Rehabilitation & Employment / Disabled People)
- ILO Convention 169 (Indigenous and Tribal Peoples)
- ILO Convention 177 (Domestic Work)
- 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 the laws, if more stringent than the aforementioned.

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The organization undertakes to comply, with no limitative value, with the following laws and regulations: or the D.L. 345/99, on child labour:

- Legislative Decree 81 and subsequent amendments on safety
- the EEC Recommendation of 11/27/1991, on the protection of the dignity of work
- or art. 2106 of the Italian Civil Code and Article 7 of the Workers' Statute, on disciplinary practices;
- or the C.C.N.L.

It also undertakes:

- for the protection of minors and young workers;
- not to use and / or not to favour any form of forced labour in any way;
- for the health and safety of workers and the workplace;
- for the freedom of association and 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 the monitoring of its performance and continuous improvement.

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

With the dissemination of this Code of Ethics, this policy on Social-Ethical Responsibility is also disseminate.

4.5 Ambient (Policy of Ambient)

The activities of ARREDOLEGNODESIGN S.r.l. they are conduct 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, trying to reduce consumption and waste production.

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

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ARREDOLEGNODESIGN S.r.l. undertakes to make the entire organization aware of the need to obtain complete satisfaction of the needs of the market and of the Interested Parties, offering a competitive service, in complete respect for the environment. To this end, it applies principles and guidelines relating to 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 confronting with clear and tangible objectives as well as shared with the Interested Parties.

ARREDOLEGNODESIGN S.r.l. makes every effort at its disposal and as far as it can in order to:

- Empower employees individually;
- Seek, where possible, the collaboration and sharing of all the interested parties and in any case inform:
 - internal subjects, with adequate dissemination of information and training;
 - Members;
 - Clients;
 - Third parties, such as:
 - Providers;
 - Public Institutions;
 - Associations;
 - The community in general

making their principles public.

5. Implementation and control system

The principles of the Code of Ethics fall within the conditions governing 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 to the applicable category.

ARREDOLEGNODESIGN S.r.l. , through the SGI, it 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 the control processes, managing risks and proposing countermeasures.

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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 Supervisory Body.

Failure to comply with the duty to inform may be subject to disciplinary sanctions.

The reports received are treated by the SB confidentially, ensuring the anonymity of the whistleblower.

The SB evaluates the reports and any measures, listens to the author of the report and / or the person responsible for the violation and reasons in writing for its decisions.

Any sanctions are established on the basis of the disciplinary system envisaged by the SGI.

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