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#### INTRODUCTION

Boscarol Srl is aware that the authority of a company is identified not only through the competence of its collaborators and the high quality of the service provided to customers, but also through the attention paid to the needs of the whole group.

The principles that inspire our work are collected in this Code of Ethics in the belief that reliability is built on a daily basis by observing the rules and enhancing the value of people.

This Code of Ethics stands therefore for a distinctive and identifying element towards the market and the third parties, whose knowledge and agreement is required by all workers or partners and represents the foundation of our activity.

#### **PURPOSES AND RECIPIENTS**

This Code of Ethics explains the set of ethical and moral principles that are at the core of Boscarol Srl's activity, as well as the rules of conduct adopted by the Company both within its own activity (e.g. in the relations among its employees) and externally (e.g. in the relations with institutions, suppliers, customers, business partners (hereinafter referred to as "Stakeholders").

Compliance with these principles is of essential importance to achieve the corporate mission of Boscarol Srl and to guarantee its reputation in the socio-economic context in which it operates.

The Code is widely shared within the company.

#### 1 GENERAL PRINCIPLES

Our conduct, at all company levels, is based on the principles of legality, fairness, non-discrimination, confidentiality, diligence, and loyalty.

#### 1.1 Legality

Boscarol Srl operates in compliance with the law and with the present Code.

#### 1.2 Fairness

Fairness and moral integrity are our duty. We are bound not to establish any privileged relationship with third parties, which is the result of external pressure aimed at obtaining unfair advantages.

In carrying out our activities, we are required not to accept gifts, favours or benefits of any kind (except for objects of little value, e.g. on anniversaries) and, in general, not to accept any exchange for the purpose of granting unfair advantages to third parties. In the same way, each of us must not offer gifts of money or goods to third parties or otherwise offer unlawful benefits or favours of any kind (except for objects of small value or commercial courtesy gifts authorised by the Company).

#### 1.3 Non-Discrimination

In relations with Stakeholders and in particular in the selection and management of employees, in the work organisation, in the choice, selection and management of suppliers, as well as in relations with Institutions and Organisations, Boscarol Srl avoids and repudiates any discrimination concerning age, sex, race, sexual



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orientation, state of health, political and trade union opinions, religion, culture and nationality of its interlocutors.

#### 1.4 Confidentiality of personal information

Personal information is processed in accordance with the EU General Data Protection Regulation 2016/679 for which employees have been informed.

## 1.5 Diligence

The relationship between Boscarol Srl and its employees is based on mutual trust. Employees strive to support the interests of the company, thus avoiding the pursuit of personal interests. In those cases, in which the possibility of a conflict of interests can be depicted, it is necessary to report such practice. Boscarol Srl guarantees the confidentiality of such communication.

#### 1.6 Fair competition

We are aware that a fair competition is a healthy boost to innovation and development processes.

#### 2 RELATIONS WITH EMPLOYEES AND PARTNERS

#### 2.1 Staff Selection

Staff assessment and selection are carried out according to fairness and transparency (ref. pt. 1.3), observing equal opportunities in order to match the company needs with the candidates' professional profiles, aims and expectations.

Boscarol Srl commits itself to adopt any measure useful to avoid any form of favouritism in the staff selection process, using objective and meritocratic criteria, while respecting the dignity of the candidates and in the interest of the company's good performance.

Hired staff are provided with clear and correct information on their roles, responsibilities, rights and duties, also through the implementation of this Code.

#### 2.2 Staff Management

Boscarol Srl supports and enhances its human resources, committing itself to keep unchanged the conditions necessary for the professional growth, knowledge and skills of each person, carrying out the appropriate training for professional updating and any initiative aimed at pursuing such purpose.

Boscarol Srl promotes workers' participation to the life of the company.

The company shall never force any worker to perform tasks, services or favours that are not due according to his employment contract and to his role within the company.

Boscarol Srl is committed to opposing mobbing episodes, stalking, psychological violence and any discriminatory behaviour or behaviour harmful to a person's dignity inside and outside the company facilities.

Relations between employees must be carried out with loyalty, fairness and mutual respect, in compliance with the values of civil living together and personal freedom.



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#### 3 SAFETY – WORK ENVIRONMENT

It is Boscarol's commitment to ensure

- a healthy working environment, safe and respectful of workers' dignity.
- safety in the workplace both by implementing the measures required by the law in force and by actively promoting a safety culture through specific training courses.

#### 4 COMPANY MANAGEMENT

### 4.1 Compliance with internal procedures

Boscarol Srl believes that management efficiency and control culture are key elements for the fulfilment of its objectives. We are bound to observe the company's internal procedures and instructions according to the certified quality management system. Recipients must act according to their own authorisation profiles and must keep all appropriate documentation to keep record of the actions taken on behalf of the company.

## 4.2 Accounting Management

Accounting management activities, in compliance with the regulations and laws in force, follow the principles of truthfulness, accuracy and transparency, so that our reputation is protected both internally and externally. Compliance with these principles also allows the company to plan its operational strategies according to its real economic and asset situation.

#### 4.3 Protection of business assets

Everyone is bound to work carefully to protect the company's assets, through correct and responsible behaviours and in line with the operating procedures established to regulate their use. In exercising their duties, employees are required to rationalise and control the use of company resources. Hardware devices must be protected against unauthorised access as defined in the company procedures set out in the QMS.

#### **5 EXTERNAL RELATIONS**

#### 5.1 Relations with customers and suppliers

It is necessary to deal with customers and suppliers with politeness, competence and professionalism, in the belief that the protection of the company's image and reputation, and consequently the achievement of the company's objectives, depends on our conduct. Any form of unfair or misleading behaviour must be avoided. We are required to make a constant effort to offer prompt and high-quality services to customers, trying to limit any form of inefficiency or delay in order to maximise customer satisfaction.

Relations must be based on loyalty, fairness and transparency.

Relations on a purely subjective and personal basis or, in any case, based on contrasting interests are excluded. As far as it is concerned, it is necessary to ensure that customers and suppliers are also able to comply with the main ethical principles set out in this Code.