

SOCIAL RESPONSIBILITY / CODE OF CONDUCT (K21, FD 5.5)

Roiatti's Quality system includes the implementation of a Code of Ethic and Standards of Conduct.

Roiatti Social Responsibility policy has the objective to create and promote behavior that generates value to all interest groups (customers, employees, suppliers, environment and shareholders) in the context of a socially responsible culture, aiming at working ethically, considering human rights as well as the social, economic, and environmental impacts of what we do as a business.

In order to meet these principles, ROIATTI has put in effect the following commitments:

Employees: Roiatti will

- respect each employee and comply with Labor Organization Conventions and other international standards
- promote equal opportunity, respect diversity and ban discrimination based on gender, age, disability or any other circumstance
- obtain maximum commitment and loyalty
- take measures to guarantee employee safety and general health
- ensure compliance with all Laws and Regulations
- punish all type of harassment
- pay at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. In accordance with local laws, workers should be compensated for any overtime hours
- not inflict inhumane treatments, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, or verbal abuse. Workers should be free to move about
- encourage open communication with management regarding working conditions without fear of reprisal, intimidation or harassment
- respect the rights of workers to associate freely, form and join workers organizations of their own choosing, seek representation, in accordance with applicable laws
- prohibit bribes or any other means of obtaining undue or improper advantage
- respect intellectual property rights, and the transfer of technology and know-how should be done in a manner that protects intellectual property rights

Customers: Roiatti will

- always aim at customer satisfaction with the objective of establishing long-term and lasting relationships of trust and will always implement responsible and transparent communication to facilitate a better knowledge and understanding of our services
- Respect fair business standards

Suppliers: Roiatti will

- be compliant with work legislation and other international standards
- create and maintain strong relationships with key suppliers

- choose suppliers who share our ethical principles in relation to employment practices, quality, and environmental controls.
- consider social and environmental criteria in taking decisions to contribute to the creation of a socially responsible supply and value chain
- promote communication with suppliers to generate open innovation, development and improvement
- prohibit any form of corruption, extortion, or embezzlement
- prohibit any form of bribes or other means of obtaining undue or improper advantage
- not tolerate disclosure of information, business activities, structure, financial situation, and performance

Health and Safety: Roiatti will

- provide a safe and healthy working environment for all our activities
- Keep the ISO 45001:2018 certification
- promote a health and safety culture which focuses on maintaining the highest standards adhering to health and safety requirement and encourage workers to openly communicate with management about doubt, questions or issues

Environment: Roiatti will

- follow its Environmental Policy and Corporate Sustainability Programme to reduce and minimize the environmental impact
- implement an environmental and sustainability policy which is reviewed annually and updated as appropriate and required

Community engagement: Roiatti will

- be sensitive to the needs of local people and groups, and by promoting ethical and socially responsible trading.

ESG: Roiatti will

- Plan a business strategy for long-term growth that works in harmony with people and the planet and keep our ESG Policy updated and communicate it.

Shareholders: Roiatti will

- ensure a transparent and sustainable business by supplying knowledge of all necessary aspects for the adequate assurance of the shareholder's rights
- adequately comply with its legal and fiscal obligations, avoiding all practices that will go against the law

Ethic Code

All the above-mentioned topics are deeply developed in Roiatti' s Ethic Code, that is available for all employees on the bulletin board, and it is also given them during specific training sessions. Following aspects are clearly described on our Ethic Code:

- Attention to safe/healthy/ environmental work for staff and absence of any discrimination

- Correctness, Quality, (Accounting) Transparency
- Legality and Contractual Standards
- Conflict of Interest
- Internal Controls
- Anti- Bribery (Gifts/Benefits/Other Advantages)
- Anti-Trust (Corruption)
- Money Laundering / Terrorism / Violence / Substance abuse
- Social Responsibility
- Confidentiality
- Corporate Assets/Information Systems (security)
- Relations with Stakeholders (clients, Public Administration, Suppliers, Consultants, Authorities, etc.)
- Human Resources
- Environmental Protection
- Violations (Escalation/Corrective Actions)

The reporting of any deviations can be done at any time, anonymously or not, by immediately advising the CEO or Managing director, as reported on paragraph "Reported violations of the Code of Ethics"

Periodic self-evaluations should be conducted to ensure compliance with this Code and reasonable efforts should be undertaken.

The Ethic Code is reviewed at least annually or whenever necessary. The updated versions will be displayed on the bulletin board and will overwrite superseded versions.

Attachment:

Ethic Code