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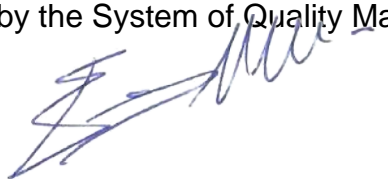
OPERATING PROCEDURE FOR THE ETHICAL CODE OF BUSINESS CONDUCT

PROVISION OF QUALITY

This procedure is

- Issued by the System of Quality Management

(Signature)



- Verified and approved by the CEO

(Signature)



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1 Purpose and applicability

The code of conduct that OCAM SRL presents to its employees, collaborators, customers, suppliers and subcontractors was written with the participation of all in respect of opinions, sharing aspirations and intentions, but above all to safeguard all the figures within the processes and of corporate activities.

The main objective of the Code of Ethics is to guide and standardize the behavior of these individuals at all levels in the performance of their duties and responsibilities, both in internal and external relations with the company. The provisions and principles established in this Code of Ethics integrate the behavior that the staff of OCAM srl is required to observe in the exercise of their job duties by virtue of current legislation and the applicable and in force National Collective Agreement.

This document therefore collects a set of principles and rules whose observance by employees and collaborators is of fundamental importance for the proper functioning, reliability and reputation of OCAM srl.

This document is therefore entrusted to the conscience of those who will have to implement it and make it respected: it is therefore attributable to values of an ethical and not a juridical nature.

Its purpose is to disseminate the values of correctness, loyalty, integrity and transparency that must characterize the actions and behaviors of the subjects who work for the company.

To this end, OCAM srl undertakes to promote and disseminate its knowledge, as well as to ensure that the provisions contained are respected by intervening, if necessary, with the corrective actions deemed most suitable.

Recipients of this Code of Ethics are the members of the Administrative Body, the Managers, the Employees, the Collaborators who work for OCAM srl and all those who work to pursue its objectives.

OCAM srl undertakes, in relations with its counterparts, to inform them of the existence of this Code of Ethics.

A warm thank you to all those who will diligently contribute to spreading and disseminating the principles set out here on every occasion.

2 References

The subjects who act to pursue the objectives of OCAM srl operate in compliance with the following inspiring principles:

- UNI-EN ISO 9001:2015 standard § 4.1 "Understanding the organization and its context"
- UNI-EN ISO 9001:2015 § 6.1 "Actions to address risks and opportunities"
- UNI-EN ISO 9001:2015 standard § 7.1.2 "People"

- MANQUA Quality Management System Manual
- Internal company Policy

3 Responsibility

The role of the builder in the metal structures department certainly represents one of the activities considered most at risk in the sector. The attention, awareness, training of the personnel working on site has always been the priority mission of the property, together with research and enhancement of the specific activity. The sector considered "poor" and represented by very strong competition has however favorably received the company's commitment. The attention and study of methods of organization, management and control of activities to guarantee the safety and protection of workers constitute a serious commitment to guarantee everyone a serene and protected activity. For this reason, the company intends to activate verification procedures that balance the working environment with working conditions commensurate with the factors that influence the activity itself.

OCAM SRL has adopted the concept of the European Directive distinguishing the principle of "maximum safety reasonably practicable" and that of "maximum safety technologically possible", by applying the latter it has the collaboration of expert personnel to achieve the objective in favor of workers.

Planning prevention becomes a warning that the company intends to pursue at any cost.

4 Work Documentation

- Recall letters.
- Letters of delivery of Safety/Administrative/Contractual documentation

5 Operative Procedure

5.1 Introduction

OCAM srl was founded in 1956 as a metal carpentry workshop. Today it is able to process 5,000 tons. of steel per year, complex structures with a high architectural content. Our business is placed on the national and international market with steel and glass, steel and polycarbonate structures, renovations and static consolidation, large roofs, skylights, shopping centers, hospitals and building envelopes in general.

1956 - 2021 - 65 years of activity, an important goal achieved, in which the constant contribution of employees, suppliers and collaborators, partners prevailed.

The company, mainly performing a service role as well as a builder in the construction sector chain, organizes and focuses the work through roles and tasks projected in the pursuit of customer satisfaction.

The principles on which the activity is based are represented essentially and mainly by paying attention to respect for all the workforce, their respective roles and duties, on the risks deriving from the activity to the detriment and damage of the workers themselves.

The alternation of roles, seeking methods that can overcome repetitive and monotonous work organizations, are the additional principles that the company considers a priority for guaranteeing health and safety in the workplace.

The experience acquired over years of activity dedicated to the construction of complex buildings in terms of shapes and geometries, allows the company to successfully solve construction site problems. Through continuous research, it often identifies the solutions that can guarantee maximum efficiency, the best price and the greatest safety.

The Code of Ethics applies to all OCAM srl personnel regardless of the role and function exercised, meaning by personnel employees with a subordinate employment relationship, independent and/or para-subordinate collaborators, members of corporate bodies and subjects who at any title perform work or professional activity, even occasional.

5.2 The quality of relationships

OCAM srl considers the search for quality with its interlocutors to be fundamental, whether they are employees, collaborators, agents, customers, partners, suppliers and consultants in order to comply in the realization of its mission. Everyone is called to disseminate the principles and characteristics, including cultural ones, of this Code of Conduct through respect for their role and duties.

5.3 Observance of standards

OCAM srl considers respect for roles and duties essential in compliance with the rules assumed by its interlocutors, whether they are employees, collaborators, agents, customers, partners, suppliers and consultants, which form an integral part of the contractual obligations.

5.4 Legality

In carrying out the professional activity of their interlocutors, whether they are employees, collaborators, agents, customers, partners, suppliers and consultants, they are required to scrupulously comply with the regulations in force and in no case can the relationship be conducted to their own advantage. OCAM srl operates in compliance with current laws, professional ethics and internal procedures. The pursuit of interests can never justify conduct contrary to the principles of legality, correctness and honesty. Relations with interlocutors are based on criteria and conduct of correctness, collaboration, loyalty and mutual respect. In compliance with the aforementioned

principles, company operators must always issue truthful statements relating to the company in compliance with confidentiality and company secrets.

5.5 Integrity

In carrying out the professional activity of their interlocutors, whether they are employees, collaborators, agents, customers, partners, suppliers and consultants, these are required to carry out their activity avoiding to place themselves in situations that are to the detriment of the interest of the Company OCAM srl or respectively of the role of another interlocutor, damaging his image.

5.6 equity

In carrying out the professional activity of their interlocutors, whether they are employees, collaborators, agents, customers, partners, suppliers and consultants, they are required to carry out their activities with objectivity and fairness.

5.7 Impartiality

In carrying out the professional activity of its interlocutors, whether they are employees, collaborators, agents, customers, partners, suppliers and consultants, OCAM srl undertakes to avoid any discrimination based on age, gender, sexuality, state of health, race, nationality, political opinions and religious beliefs.

5.8 Transparency

In carrying out the professional activity of their interlocutors, whether they are employees, collaborators, agents, customers, partners, suppliers and consultants, these are required to inform the interlocutors in a clear and transparent way about their situation and their performance, without favoring any group of interest or individual.

5.9 Particular Rules

5.9.1 Employment Relationship

All employees are hired with a regular employment contract. The conditions of the relationship are those provided for by the National Category Contract.

The worker must perform the service due with the diligence required by the nature of the service itself and the interest of the company, respecting the qualitative and quantitative criteria established for the service itself.

Breach of duty of care may result in:

- the imposition of disciplinary sanctions as provided for by the National Category Contract in force and, in the most serious cases, the notification of dismissal;
- in the event of loss of entrusted materials and tools and any damage, provided it is attributable to fault or negligence, the assessment of the damage and the amount will be contested in advance, and possibly withheld within the limits established by the relevant legislation and the applied National Category Contract.

For more information on working hours, prohibitions and document management, see the INTERNAL COMPANY POLICY also posted on the noticeboards.

5.9.2 Flexibility

In personnel management and to ensure maximum efficiency of all employees, the Company takes into consideration all legitimate forms of full or part-time organization in favor of the needs deriving from maternity and childcare.

5.9.3 Equal opportunities and confidentiality of the relationship

OCAM srl guarantees its collaborators a treatment commensurate with the quality and quantity of the service performed. In managing the relationship, maximum privacy is required from both, in compliance with current legislation, in the management of the information received.

5.9.4 Protection and confidentiality of information

The information and documents produced within OCAM srl, including the personal data of members and employees as well as customers and suppliers, the company's strategies and know-how, must be kept with the utmost diligence and protected adequately in the compliance with EU Regulation 2016/679 on the protection of personal data.

OCAM srl ensures the adoption of procedures designed to guarantee the confidentiality of the information in its possession and refrains from seeking confidential data through illegal means.

The recipients of this Code cannot in any way use company assets in a manner contrary to the provisions of the same code. Company assets must be used only in the performance of one's work duties without illegal materials (programmes, videos, photos) being stored on the work PC.

5.9.5 Conflicts of Interest

Each collaborator is bound by the obligation of correctness and non-competition in the terms established by art. 2105 of the Civil Code. Each collaborator is required not to generate a conflict between his own interest and that of the company which in any case involves damage to the company or to the employees or third parties in general, especially if the interest in any way compromises the safety of workers, whether they are employees of the same collaborator.

Respect for the decorum and dignity of the human person with a view to safeguarding the safety of all workers.

5.9.6 Rules of conduct in customer relations

Every collaborator, employee, agent, partner and consultant must do their utmost to ensure good customer satisfaction, maximum collaboration, correctness and transparency. To this end, it is absolutely forbidden to provide false or misleading statements to Customers. The Employees and members of the Administrative Body undertake to provide the data necessary to guarantee correct and adequate information to the subjects indicated.

In addition to the minimum standard requirements established by current legislation, the activity of OCAM srl must also satisfy those of training and informing customers, who due to inexperience are not aware of the various problems deriving from the company's activity.

5.9.7 Rules of conduct in relations with agents, consultants and suppliers.

The criteria of conduct set out express general principles that must also be followed in operations with intermediaries, banks or brokers.

The relationship with each collaborator, agent, partner and consultant is understood as part of us, in a defined key and strategic role in the company system. Everyone must feel an active and supportive part in order to obtain customer satisfaction in order to guarantee the company mission in strict compliance with the organization and safety control procedures to protect the activity of each worker.

5.9.7 Rules of conduct in relations with public institutions and supervisory authorities, gifts.

OCAM srl's relations with the representatives of public institutions - Supervision are based on criteria of transparency and professionalism, in a spirit of maximum collaboration aimed at substantial compliance with current regulations.

It is absolutely forbidden for all those who operate to pursue the objectives of OCAM Srl to promise or offer, directly or indirectly, to Employees and Officials of public Institutions and Supervisory Authorities, payments and material benefits of any entity aimed at compensating an act of their office, or to obtain an act contrary to their official duties.

For their part, the Employees and all the subjects who work to pursue the interests of OCAM srl must not accept gifts or services of any kind from subjects with whom they maintain relationships connected with their work activity, if these exceed the limits established by customs or if they are in any case contrary to the legislation currently in force.

The sponsorship of events or subjects is the exclusive responsibility of the administrative body, which evaluates the opportunity, in compliance with the principles of sound and correct management. The Company does not participate in these initiatives to obtain any undue economic advantage, but only for promotional purposes.

5.9.8 Rules of conduct in relations with the market

The criteria of conduct set out express general principles in the respect and operation of competition on the basis of what is provided for by the CONFINDUSTRIA trade associations. OCAM SRL undertakes to promote and disseminate information that is useful to the customer with the utmost respect for the competition. It also undertakes to maintain an attitude and financial conduct such as to guarantee reliability and soundness towards its customers. Compliance with all regulations concerning the safety and protection of workers in the workplace represents a clear message of transparency and corporate seriousness towards all customers.

5.9.9 Accounting and internal control.

OCAM SRL operates in maximum financial transparency by drawing up financial statements that guarantee reliability and seriousness to customers. The profits produced are reinvested

for the development of the activity and to rigorously promote compliance with the regulations in terms of safety and protection of workers even when the market did not want to recognize the related costs. It also promotes all the processes aimed at guaranteeing the analysis and effective management of the entrepreneurial risks associated with the company's activity. Financial statements collaborators and auditors are required to keep true and accurate records of all accounting transactions. Compliance with all regulations concerning the safety and protection of workers through financial planning and investment in the workplace represents a clear message of transparency and corporate seriousness towards all customers. This procedure is delivered to all workers and collaborators currently employed by OCAM SRL. Similarly, it will be delivered to future workers and collaborators.

5.9.10 Protection of the environment, safety and sustainable development.

As part of its business, OCAM Srl undertakes to operate in compliance with the protection of the environment, according to the principles of sustainable development.

The company adopts strategies aimed at improving the environmental performance of its processes and promoting the saving of resources; prohibits any activity that leads to the pollution of water, soil and subsoil and undertakes to report potential pollution phenomena. OCAM srl ensures respect for the physical and cultural integrity of the person and respect for the dimension of relationships with others. OCAM srl ensures that internal working conditions are respectful of individual dignity and take place in safe working environments. OCAM srl considers the safety and physical and moral integrity of all those who work to achieve the company's strategic objectives to be a fundamental value. To this end, it undertakes to promote compliance with current regulations and observance of company provisions on safety and hygiene at work, engaging in constant training activities.

OCAM srl operates in compliance with workplace safety legislation, providing its employees with efficient and adequately maintained tools and equipment.

Personnel must take care of their own health and safety and that of other people present in the workplace, affected by the effects of their actions or omissions, in accordance with the training, instructions and means provided by the Employer.

6 Distribution

This procedure is delivered to all workers and collaborators currently employed by OCAM SRL. Similarly, it will be delivered to future workers and collaborators.