



# **CODE OF ETHICS**

October, 2021

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## PURPOSE OF THE CODE OF ETHICS

It has always been the policy of the Stefanini Group and its subsidiaries (hereinafter called "Stefanini") to conduct and develop its business in accordance with:

- All applicable national and transnational laws and regulations in the countries in which Stefanini does business;
- Specific rules established by Stefanini in this Code of Ethics and company regulations and policies.

The aim of this Code of Ethics is therefore to ensure Stefanini's development in accordance with national and transnational laws and ethical standards.

This Code of Ethics is not intended to replace other existing policies, rules, and regulations in force within Stefanini.

Every director, officer, and employee of the Stefanini Group has an obligation to abide by this Code of Ethics and may not enter into agreements, contracts, or other arrangements that violate this Code of Ethics or other applicable regulations.

## RESPECT FOR FUNDAMENTAL RIGHTS

Stefanini has made a commitment to respect and promote the fundamental rights established by the Universal Declaration of Human Rights, the dignity and intrinsic worth of individuals, the private life of employees, and equal rights for all persons, in line with the United Nations' Global Compact program.

Stefanini attaches special importance to respecting the following principles established in the U.N.'s Global Compact, pertaining to Human Rights, labor standards, and the environment.

Please refer to Stefanini's Modern Slavery Statement for further details.

### Child Labor

Stefanini complies with national laws and regulations on child labor, and in all instances:

- Strictly refuses to employ children under the age of 16;
- Complies with the provisions of ILO Convention No. 138 pertaining to the employment of children between 15 and 18 years of age.

Stefanini monitors that its suppliers and partners subscribe to the same obligation.

### Employment of the Disabled

Stefanini complies with national laws and regulations on hiring the disabled and undertakes to participate in actions encouraging their employment.



## **Discrimination**

Stefanini complies with national laws related to discrimination. In particular, no applicant may be eliminated from recruitment opportunities or access to an internship or company training programs, and no employee may be reprimanded, dismissed, or indirectly or directly discriminated against in particular regarding pay, training, placement or qualification programs, job promotions, transfers, or contract renewal because of, for instance, their place of birth, ancestry, fortune, philosophical conviction, sex, sexual preferences, age, family status, genetic characteristics, actual or alleged membership or non-membership in an ethnic group, nationality, race, political opinions, union activities, religious beliefs, physical appearance, actual or future health and disability, pregnancy, or family name.

No employee may be reprimanded, dismissed, or discriminated against because they testified in good faith about any of the actions listed above or reported them.

## **Sexual or Psychological Harassment**

All employees have the right to work in a positive environment, free from any illegal harassment as construed pursuant to the regulations and policies in force in the country in which Stefanini is doing business.

In particular, Stefanini forbids any illegal conduct constituting sexual or psychological harassment, even if there is no relation of job subordination between the parties. In particular, any conduct constituting sexual or psychological harassment is illegal and forbidden when:

- Acceptance of this conduct is implicitly or explicitly presented as a condition for hiring an individual;
- A decision affecting an individual's job is based on acceptance or rejection of such conduct;
- Or such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

All complaints of harassment will be handled with the utmost confidentiality. Any employee who believes they have been harassed should report the alleged conduct immediately to either their superior or directly to the Human Resources Manager, their company's Legal Department, or the CEO. Prompt action will be taken to investigate and act on complaints of conduct in violation of this policy. If a claim is valid, appropriate discipline and corrective action will be directed at offending parties.

## **Health and Safety at Work**

Each workstation must comply with requirements respecting health, safety, and ergonomics, in particular work stations used for research, development, design, and product manufacturing.



This requirement is considered from the outset of the business processes during the phase of determination of such process.

## **SUPPORTING SUSTAINABLE DEVELOPMENT**

### **Environment**

Respect for the environment and the constant improvement of ways to protect it are a priority at Stefanini.

By implementing an Environment Management System (EMS) in accordance with ISO 14001, Stefanini aims at excellence in protecting the environment, reducing consumption of raw materials and energy, optimizing natural resources and reducing waste discharges during the design, manufacture, distribution, use, and recycling of its products. In particular, manufacturing or selling products that present an unacceptable risk for individuals' health and the environment, especially products containing asbestos, is totally forbidden.

Procedures for implementing and auditing compliance with the rules for protecting the environment are given in detail in Stefanini's Legal Policies.

Stefanini is committed to environmental leadership in all of its business activities. Stefanini provide policies to provide a safe, healthful workplace, protecting the environment, conserving energy, and natural resources. With these policies in place we believe that we can achieve a healthy and safe environment.

We are committed to do and will:

- Provide a safe and healthful workplace and ensure that personnel are properly trained with the appropriate safety and emergency equipment.
- Be an environmentally responsible neighbor in the community where we operate, and correct incidents or conditions that endanger health, safety, or the environment.
- Conserve natural resources by adopting pollution prevention practices. Ex: extending the life of equipment through preventive maintenance scheduling, purchasing, and reworking used equipment etc.
- Develop and improve operations and technologies to minimize waste, and other pollution, minimize health and safety risks, and dispose of waste safely and responsibly.
- Ensure the responsible use of energy throughout our business, including conserving energy improving energy efficiency, and giving preference to renewable over non-renewable energy when feasible.
- Participate in efforts to improve environmental protection and understanding. Sharing appropriate pollution prevention technology, knowledge, and methods with other companies.
- Meet and exceed all applicable legal requirements set and adhere to stringent requirements no matter where we do business.



- Promptly report all noncompliance issues in accordance with applicable governmental reporting requirements, evaluate causes of noncompliance, and implement corrective actions.
- Establish procedures for periodic review of environmental compliance with all laws and regulations.
- Establish procedures to ensure all that employees are knowledgeable of, understand and comply with all applicable environmental laws and regulations.
- Promptly correct any practice or condition not in compliance with this policy.

## **Human Resources**

### **Freedom of Expression and Corporate Dialog**

Stefanini is committed to developing a relationship of confidence at all levels of the company, encouraging employees to express themselves freely to help improve their work environment.

Stefanini strives to develop a responsible corporate dialog with employees. With this in mind, Stefanini keeps its employees or their representatives informed of its activities and complies in all instances with laws and regulations pertaining to informing and consulting employees.

### **Developing the Potential of Each Employee**

Stefanini encourages the involvement of its employees in the following ways:

- Special training programs and the possibility of acquiring multiple capabilities;
- Giving them responsibility and self-sufficiency;
- Contributing to constant progress at all levels;
- Offering career progress and fair pay.

These principles link Stefanini's development to the well-being of all its employees, no matter where they work and what the local laws may be.

## **BUSINESS CONDUCT**

### **Legitimate Use of Stefanini's Funds, Services, and Assets**

#### **Basic Policy**

The use of Stefanini's funds, services, or assets for any unlawful or improper purpose is strictly forbidden. No individual or company shall engage in the practice of purchasing privileges or special benefits on behalf of Stefanini through the payment of bribes, gratuities, or other forms of payoffs, in cash or in other benefits. Likewise, no company or individual (domestic or foreign) shall accept money or benefits in kind in violation of any law or regulations.





Please refer to Stefanini's Anti-Bribery and Anti-Corruption Policy for further details.

## **Political Contributions**

Stefanini makes no payments and provides no services to political parties, elected officials, or candidates for office, notwithstanding the lawful nature of such contributions pursuant to laws in countries where such payments might be made.

## **Illegal payments to government or administrative agencies or their employees**

No payment may be made in hopes of obtaining favorable action from a government or administrative agency. Gifts, services, or lavish entertainment offered to government or administrative employees or officers are forbidden since they may be construed as attempts to influence government or administrative decisions in matters affecting Stefanini.

## **Truth and accuracy of accounts, books, and records**

All assets, liabilities, expenses, and other transactions carried out by companies in the Stefanini Group must be recorded in the companies' books and accounts which are to be kept truthfully and accurately, in accordance with the applicable accounting principles, rules, and laws.

No undisclosed funds or unrecorded assets of Stefanini companies or subsidiaries shall be established or maintained for any reason whatsoever. Documents pertaining to commercial or financial transactions must reflect these transactions faithfully. No payment may be approved or made with the intention or understanding that all or any part of such payment is to be used for any purpose other than that described in the documents supporting said payment.

No false or artificial entry may be made in the books and records of Stefanini or its subsidiaries for any reason whatsoever.

## **Dealings with Customers and Suppliers**

### **Gifts and Entertainment**

#### **Accepting Gifts**

Stefanini policy forbids the acceptance of any gift or gratuity from customers or suppliers in any form whatsoever (in particular, amounts of money, merchandise, services, entertainment, or travel) except where the gift or gratuity is only of token value.

If gifts or gratuities have already been received, they are to be returned to the giver. When it would be discourteous to refuse or to return the gift, the employee must inform the Group's Vice President of Human Resources and their company's Legal Department who will decide what to do with the gift in accordance with this Code, and the employee must ask the customer or supplier to refrain from giving such gifts in the future.



## Offering Gifts

It is forbidden to give any gratuity in cash, in kind, or other (such as bribes or kickbacks) to any representative of a customer or a supplier, directly or indirectly, in order to obtain a contract or any other commercial or financial benefit.

In all instances, gifts or favors except of token value given to potential or current customers or suppliers are strictly forbidden.

Please refer to Stefanini's Anti-Bribery and Anti-Corruption Policy for further details.

## Choosing Suppliers and Service Providers

The choice of suppliers or service providers for Stefanini must be based on quality, need, performance, and cost. During negotiations with suppliers and service providers, it is the responsibility of each Stefanini employee and officer to promote Stefanini's best interests within legal limits, to seize the best opportunities, and to obtain the best conditions, without any favoritism because of friendship or discriminatory criteria forbidden by this Code of Ethics.

## Consultants and Other Service Providers

Agreements by and between Stefanini and its agents, representatives, and consultants, or any other service provider must clearly list the actual services to be performed, the basis for fees or the price, and all other terms and conditions. All payments must be determined and paid in relation to the actual services provided. Agents, representatives, and consultants must not be permitted to act on behalf of Stefanini unless explicitly authorized to do so in writing by duly empowered Stefanini representatives.

## Investing in Suppliers

No employee or officer may directly or indirectly invest in a supplier working with Stefanini, a supplier's parent company or its subsidiaries, nor may an employee or officer lend them money, with the exception of purchasing securities offered on a regulated market within the limits set by regulations in force and the Code of Conduct.

## Purchasing Goods or Obtaining Services from Suppliers for a Personal Use

Employees and officers may not use their connection with Stefanini to obtain the same advantages for their own personal purchases as those granted by the supplier to Stefanini.

## Fair Competition

Stefanini believes in strict compliance with the rules and laws governing competition in force in each country where Stefanini does business. The rules and laws of fair



competition forbid any written or unwritten understandings, agreements, plans, arrangements, or schemes among competitors involving prices, territories, market shares, or customers.

As a result of this, Stefanini's employees and officers are forbidden from entering into such agreements or understandings with Stefanini competitors.

Furthermore, joining a professional association where competitors are members requires the approval of the appropriate Human Resources Manager.

## **Industrial Property Rights**

Stefanini formally forbids deliberately infringing on third parties' industrial property rights no matter what reason may be given (risk of losing market shares, chance to develop new business, obtaining an order for products, etc.).

## **PROFESSIONAL CONDUCT**

### **Confidentiality**

#### **Confidentiality of Personal Data about Employees**

Information pertaining to employees' personal life, performance evaluations, promotions, and pay must be kept confidential. Access to this type of information is limited to duly authorized individuals.

Consequently, each employee must protect the confidentiality of data about themselves and is also forbidden from searching for such data about other employees unless authorized to do so in connection with their duties. Other than duly authorized individuals, employees may only have access to information concerning them personally.

#### **Confidentiality of Stefanini documents and data**

For the entire time an employee works for the Stefanini Group and after they have left Stefanini, they may not use or disclose to another person any confidential information about Stefanini, no matter where the information originated or how they obtained it. Any violation of this rule may result in prosecution pursuant to the applicable provisions of labor law, civil law, or criminal law.

In particular, the following are deemed to be confidential: information about the existence and the terms and conditions of Stefanini's commercial projects or agreements, Stefanini's financial data, and any other sensitive information, such as information about production units' earnings, intellectual property rights, technological information, information about hardware and software used to conduct normal business.

It is forbidden to disclose any of this information without the prior consent of Executive management or the CEO of the relevant headquarters.



Individuals whose employment contract has come to an end or who are no longer bound by an employment contract with Stefanini are required to keep all this information confidential.

## **Safeguarding Stefanini's Property**

Stefanini employees and officers are responsible for proper use of Stefanini property and assets, including intellectual property information, technology data, computer hardware, software, and media for data storage, real estate, equipment, machinery and tools, components, raw materials, and cash (the "Assets").

In particular, Stefanini employees and officers must:

- Use Assets according to the rules and procedures in force at Stefanini;
- Take all precautions to prevent unauthorized use of Assets by any third parties (including family members);
- Use Assets in authorized areas only, and if at home, exclusively for professional duties;
- Safeguard all passwords and codes to prevent any unauthorized access to Stefanini's computerized data;
- Not reproduce software developed at Stefanini, procedures, codes, manuals, leaflets, training or other programs unless consent is given by Executive management or explicit delegation is granted by a member of Management;
- More generally speaking, use Stefanini's new IT and communication technologies in accordance with the rules established for proper use of new IT and communication technologies; and
- When leaving Stefanini for any reason whatsoever (retirement, end of employment contract, or any other reason) return all documents containing the confidential information listed above without keeping any copy and any Asset in their possession to the relevant Human Resources Department.

## **Loyalty**

Stefanini employees and officers must perform their duties and assignments loyally.

An executive or management position with Stefanini represents a fulltime commitment. Therefore, no executive or member of Management may hold a second job, or own or operate a business that requires an active involvement on their own time outside what is expressly provided in their employment contract. This rule is not intended to forbid temporary involvement, outside working hours, in a business that is not competitive with Stefanini, owned or operated by a spouse or another family member.

Consequently, no activity may be undertaken that might cause a conflict of interest between the employee and Stefanini.



## Conflicts of Interest

A conflict of interest exists when an employee or a close relative might benefit personally from a transaction involving a company in the Stefanini Group or when an employee attempts to choose or have a company or individual chosen for such a transaction when they or a close relative has a financial interest in it.

When in doubt, the employee must refer to their manager to decide if the planned transaction constitutes a conflict of interest or not.

## Alcohol, Drugs, and Tobacco

Stefanini forbids the distribution, sale, purchase, exchange, possession, or use of illegal drugs in the workplace. The same restrictions apply to alcohol unless its use has been expressly authorized by the applicable company rules. Smoking is forbidden at the workplace, except in designated areas.

## COMPLIANCE WITH THIS CODE

- All Stefanini employees and officers are expected to read, understand, and comply with this Code of Ethics and if necessary to recall the rules and policies to others in connection with his or her job at the workplace. Executive Management and each office shall give particular attention to making this Code known to Stefanini employees and ensuring they comply with it.
- **Exceptions:** any exception to the policies set forth in this Code of Ethics and the rules resulting from it must have the prior written consent of Stefanini's CEO unless otherwise explicitly stated in this Code.
- **Violations:** any Stefanini employee who is not sure if they are carrying out a practice that is or may be in violation of this Code of Ethics is strongly encouraged to speak to their manager, the Vice President of Human Resources or the Group's Legal Department in order to obtain more information about the application and scope of the Code of Ethics.
- **Affidavit:** at the time of each Annual Performance Evaluation, officers and certain other Stefanini employees, as named by the Vice President of Human Resources or the CEO, will be required to sign an affidavit certifying that they comply with this Code of Ethics.
- **Interpretation:** all questions about the interpretation, scope, and application of this Code of Ethics should be referred to the Vice President of Human Resources or CEO who will consult with Stefanini's Legal Department to find an answer.
- **Sanction:** Any violation of this Code may be sanctioned by Stefanini. The range of sanctions may include but are not limited to a warning to the employee or dismissal of the employee, depending on the gravity of the violation and the applicable provisions of national legislation.

