

CODE OF ETHICS AND CONDUCT





CELADA Fasteners

CODE OF ETHICS AND CONDUCT

All of us here at **CELADA Fasteners** are committed to following this Code.

The Code establishes the rules and principles on how we conduct our business and explains how we act and what we expect from each other. However, the Code cannot envisage every situation possible. Should you have questions about how to act in any situation, talk to your supervisor, your supervisor's superior, or another member of management for advice and support.

If you have questions about reporting procedures and/or interpretation of policy, both staff and management may contact HR or the head of ESG. **CELADA Fasteners** does not accept any discrimination or retaliation against employees who report suspected violations in good faith.

To ensure compliance with the Code, **CELADA Fasteners** conducts annual Code of Conduct training, which all employees are required to attend.



OUR VALUES AT CELADA Fasteners

The core values of **CELADA Fasteners** have their origins in the history of the company and form the foundation of our corporate culture. These values define the way we work and conduct ourselves, while inspiring and supporting us in our ongoing efforts to build a successful, sustainable business.



PROGRESSIVENESS



ETHICS



INNOVATION



INTEGRITY



COURAGE



SOCIAL
RESPONSIBILITY



FORWARD-THINKING



COMMUNITY



WHAT DOES THE CODE ENCOMPASS?

For Employees

This Code applies to all **CELADA Fasteners** Employees and all others acting on behalf of the company, including temporary workers, contract workers, consultants, and members of the board of directors of **CELADA Fasteners**.

You are responsible for acting in accordance with the Code. Failure to do so may have consequences for both you and **CELADA Fasteners**. Disciplinary action may be taken, including the risk of losing your job. You and the company may also face fines or criminal charges, and the company may suffer reputational damage or other losses.

For Management

Members of management are required to act in accordance with the Code and to set a good example by way this conduct. You must also ensure that your team is familiar with the Code and has the training needed to properly understand and follow it.

In practice

In addition to the Code, **CELADA Fasteners** has policies and guidelines that establish how business should be conducted in practical terms. The purpose of these policies and guidelines is to implement the principles set out in the Code. All employees are provided with the policies and guidelines relevant to them, and you, as an employee, are expected to understand your role in their implementation. To ensure compliance with the Code, **CELADA Fasteners** conducts annual Code of Conduct training, which all employees are required to attend. This training is a reminder for all **CELADA Fasteners** Employees to report any concerns or observed conduct that may violate the principles of the Code. **CELADA Fasteners** handles and follows up on all concerns raised and ensures that the reporting party is provided with information on any progress made on the matter. Further information on how **CELADA Fasteners** ensures compliance with the Code may be found below.



A BETTER WORKPLACE FOR ALL

CELADA Fasteners Declaration of Human Rights

CELADA Fasteners is committed to ensuring the highest standards of corporate responsibility, including upholding and respecting human rights for all. We support and respect the protection of human rights and work diligently to ensure that our business partners do the same.

Our position is based on international standards, including the Universal Declaration of Human Rights and the United Nations Guiding Principles. To ensure compliance, **CELADA Fasteners** is governed by a set of policies and guidelines that are designed to encourage transparency and compliance with applicable laws and regulations, as well as with this Code.



MUTUAL RESPECT AND NON-TOLERANCE OF HARASSMENT

At **CELADA Fasteners**, we treat each other with respect, regardless of our position or who our business partner is. We promote an inclusive workplace based on honesty and trust, in which everyone feels safe and where we can work together to achieve our common goals. Conduct such as harassment, victimization, oppression, or bullying is unacceptable at **CELADA Fasteners**. The workplace must be both pleasant and accepting.



How we hit the target:

- Treat your colleagues, business partners, and other stakeholders with the same respect you would expect for yourself.
- Do not abuse your position towards other, more junior Employees.
- Do not threaten, bully, or engage in any other behavior that may be seen as offensive to another.
- Do not treat others in a way that may make them feel uncomfortable.
- Do not ask personally intrusive questions or make disparaging comments about others.
- Report all instances or suspicions of harassment to your supervisor, to your supervisor's superior, to another member of management, or to Human Resources.



DIVERSITY, EQUITY, INCLUSION

At **CELADA Fasteners**, we treat each other with respect, dignity, care, and equity. No one shall be discriminated against based on gender, religion, age, ethnicity, disability, marital status, sexual orientation, pregnancy, or other personal factors protected by applicable laws and regulations. More precisely, discrimination of any kind is absolutely unacceptable. At **CELADA Fasteners**, we believe that our success depends on diversity. To ensure a diverse and dynamic workplace, **CELADA Fasteners** promotes diversity at all levels and is committed to including and recruiting people with different backgrounds, skills, and abilities. At **CELADA Fasteners**, we base our hiring decisions on objective assessments of one's ability to achieve results, rather than on personal opinion or other subjective factors.



How we hit the target:

- All **CELADA Fasteners** Employees have equal rights, obligations, and opportunities in terms of career, working conditions, training, and development.
- Do not exclude or value people based on purely personal factors. Instead, include others at all levels and evaluate people based on an objective assessment of their ability to perform.
- If you are a member of management or are hiring, do not make hiring decisions based on purely personal factors. Instead, make hiring decisions based on an objective assessment of one's qualifications and capabilities.
- Do not make jokes or other comments related to ethnicity, gender, race, religion, or other personal factors.
- Promote diversity by including and encouraging people at all levels.
- Report any discriminatory behavior you witness, suspect, or are exposed to to your supervisor, to your supervisor's superior, to another member of management, or to Human Resources.



TERMS AND CONDITIONS OF EQUITABLE EMPLOYMENT

At **CELADA Fasteners**, we comply with applicable labor laws and regulations. We ensure that our employees receive at least the applicable minimum compensation, as well as sufficient rest hours and vacation days. We ensure work-life balance by complying with applicable labor laws and regulations.



How we hit the target:

- You have the right to receive information about your terms and conditions of employment and about your rights and obligations.
- **CELADA Fasteners** will not allow you to work amounts of overtime that are harmful or otherwise exceed the maximum allowed.
- You are entitled to hours of rest and paid time off in accordance with applicable law.



How does **CELADA Fasteners** ensure all this in practical terms?

In addition to annual training on the **CELADA Fasteners** Code of Conduct, we also regularly review (i) working hours and wages, (ii) freedom of association and collective bargaining, (iii) child labor and modern slavery, and (iv) discrimination. Should issues be raised, **CELADA Fasteners** will thoroughly investigate the matter and take corrective action and other steps to prevent similar events from occurring in the future.



CHILD LABOR AND MODERN SLAVERY

CELADA Fasteners supports and respects human rights and is committed to ensuring fair and ethical work practices. **CELADA Fasteners** does not tolerate any form of child labor or modern slavery/trafficking, including forced or other compulsory labor. Any use or support of child labor or modern slavery, either directly by **CELADA Fasteners** or indirectly by suppliers or other business partners, is strictly prohibited.



How does CELADA Fasteners ensure all this in practical terms?

CELADA Fasteners verifies the identity of all new employees but never requires any form of deposit nor confiscates identity documents from employees or contract workers. **CELADA Fasteners** also requires the business partners with whom we work to verify the identities of their employees and to report the results of said verifications. **CELADA Fasteners** monitors respect of sustainability and the progress of its suppliers. Business partners are required to regularly and explicitly confirm compliance with the principles on child labor and modern slavery/trafficking.



HEALTH AND SAFETY

CELADA Fasteners is committed to ensuring health and safety in the workplace and is committed to developing a sustainable workplace over the long term. **CELADA Fasteners** prioritizes compliance with applicable health and safety laws and regulations and is committed to eliminating accidents and other unsafe conditions in the workplace.



How we hit the target:

- Members of management are responsible for ensuring that employees receive accurate information and instructions on health and safety hazards in the workplace.
- All employees are responsible for understanding the risks to health and safety in the workplace.
- Always follow all safety instructions. Never take unnecessary risks by taking shortcuts or not following instructions.
- Ensure you are always physically able to work safely. Do not work while under the influence of drugs or alcohol or while experiencing physical or mental symptoms such as fatigue or excessive stress.
- Should you encounter a health or safety issue that could pose a threat to yourself or others, immediately stop the work you are doing and report the issue to your supervisor, to your supervisor's superior, to your health and safety representative, or to HR.



How does **CELADA Fasteners** ensure all this in practical terms?

CELADA Fasteners conducts internal audits on a regular basis. The purpose of these audits is to ensure that **CELADA Fasteners** constantly observes the requirements for ISO certification, complies with the law, and implements any corrective measures that may be necessary.



FREEDOM OF ASSOCIATION

CELADA Fasteners recognizes and respects the right of employees to form or join a union or other association to represent their rights. **CELADA Fasteners** also respects the right of employees to participate in collective bargaining. **CELADA Fasteners** strives to maintain continuous and open dialogue with employees, both directly and through their unions or associations.



How we hit the target:

- You are free to form or join a trade union or similar association.
- You are also free to refrain from joining such a union or other association.
- Members of management must respect the right of employees to form or join a union or other association. You must not interfere with or try to influence such decisions.



PRODUCT QUALITY

For **CELADA Fasteners**, compliance with applicable product quality and safety laws and regulations is vital to building trust, achieving success, and fostering long-term relationships with our customers. **CELADA Fasteners** continuously strives to improve product quality by constantly implementing measures for improvement. When **CELADA Fasteners** products are designed, developed, manufactured, marketed and sold, they comply with all requirements of product quality and safety set forth in applicable laws and regulations.



How we hit the target:

- Ensure that you follow all **CELADA Fasteners** instructions and legal obligations regarding product quality and safety. You are responsible for understanding the quality requirements of **CELADA Fasteners**.
- Do not compromise product conformity by taking shortcuts or following customer instructions that do not comply with **CELADA Fasteners** instructions or applicable laws and regulations relating to product quality and safety.
- Describe all products truthfully and never withhold important information related to product quality and safety.



How does **CELADA Fasteners** ensure all this in practical terms?

CELADA Fasteners is ISO 9001:2015 certified. As part of this ISO certification, audits of **CELADA Fasteners** premises are conducted on a regular basis. The purpose of these audits is to ensure that **CELADA Fasteners** consistently complies with the requirements for ISO certification. In addition, **CELADA Fasteners** continuously measures and tracks key indicators for our markets and procurement processes. **CELADA Fasteners** also regularly evaluates suppliers and their quality performance. Standardized operating procedures ensure continuous improvement. For information, see the **CELADA Fasteners** Quality Policy.



RESPONSIBLE BUSINESS PRACTICES

Imports and exports

CELADA Fasteners operates globally. This entails an obligation to comply with international rules on trade, including export and import regulations governing the movement of specific goods across national borders. Violations of international trade laws can result in criminal proceedings against the company and the parties responsible.

Violations may also result in damage to the reputation of **CELADA Fasteners** and the loss of export/import privileges. Therefore, a keen awareness of trade compliance is of paramount importance to **CELADA Fasteners**.

Conflict minerals

At **CELADA Fasteners**, we are committed to ensuring that our sale and use of products containing conflict minerals do not directly or indirectly finance or otherwise benefit conflicts or armed groups.

We conduct verifications and other due diligence before procurements and before undertaking any business, either directly or with business partners, in high-risk countries or regions.



How we hit the target:

When conducting trade, we ensure that we:

- Are aware of the origin and destination of the goods.
- Are aware of all export and import procedures, including the issuance of relevant documentation.
- Comply with any trade sanctions or other restrictions that may apply.
- Determine whether the business is carried out in high-risk countries and whether appropriate screening or due diligence is required.



You are responsible for understanding **CELADA Fasteners** instructions and applicable laws relating to trade compliance. Be aware that international trade laws, sanctions, and other restrictions may vary over time. If you are not sure what applies, consult with your immediate supervisor or your supervisor's superior.

Conflict minerals: tin, tungsten, tantalum and gold (3TG), mainly from the Democratic Republic of Congo (DRC), which can be used to finance armed groups or conflicts, encourage forced labor and other human rights violations, and support corruption and money laundering. High-risk countries and regions are countries or regions (i) whose domestic resources include high-demand minerals and (ii) which are afflicted by armed conflict or have weak or non-existent governance and systematic violations of international law.

In addition to screening and other due diligence, **CELADA Fasteners** always incorporates standard clauses of import/export, conflict minerals, and trade sanctions into agreements with trading partners. In addition, to ensure the responsible sourcing of conflict minerals and of cobalt throughout the supply chain, **CELADA Fasteners** has established requirements regarding these minerals in our Code of Conduct for suppliers and other business partners. As such, **CELADA Fasteners** ensures that certificates of compliance with the rules and regulations relating to conflict minerals and cobalt can be issued annually. **CELADA Fasteners** requires that the above be reported each year to management.



FAIR COMPETITION

At **CELADA Fasteners**, we compete fairly, with integrity, and in compliance with applicable competition and antitrust laws.

We support and firmly believe in a fair market in which products and services compete based on their merits. We collect information about our competitors lawfully, choose our suppliers objectively, and do not enter into anti-competitive agreements. Violation of competition and anti-trust laws and regulations can result in heavy fines and other sanctions for both the company and the parties involved, as well as damage to the reputation of **CELADA Fasteners**.



How we hit the target:

- Do not enter into agreements with competitors regarding prices, costs, cost sharing, market development, or other sensitive and important issues.
- Do not discuss sensitive business information with our competitors.
- Collect information about competitors only in legitimate ways.

COMBATTING CORRUPTION

CELADA Fasteners is committed to complying with anti-corruption laws in all jurisdictions in which we operate. We do not participate in or support, directly or indirectly, facilitation payments or other corrupt payments or practices. Nor do we allow bribes, kickbacks, or excessive gifts. We strictly prohibit any attempt to inappropriately influence decisions or to obtain favorable treatment.

Neither **CELADA Fasteners** nor its representatives will offer any reward or other benefit in violation of applicable anti-corruption laws, whether to current or prospective clients, suppliers, consultants, public sector employees, or any government representative.



How we hit the target:

- You are responsible for always acting in accordance with applicable anti-corruption legislation and with **CELADA Fasteners** anti-corruption policies and guidelines.
- Members of management are responsible for ensuring that your employees have understood their obligations as defined by internal **CELADA Fasteners** guidelines and by applicable anti-corruption legislation.
- Consult your supervisor or your supervisor's superior before conducting business with government authorities, government-owned enterprises, or representatives of such bodies.
- Do not offer or accept gifts that you suspect may be considered a bribe.
- Report any conduct that is or could reasonably be considered a violation of anti-corruption legislation or of internal **CELADA Fasteners** guidelines.



How does **CELADA Fasteners** ensure all this in practical terms?

CELADA Fasteners has specific guidelines on anti-competitive and anti-corruption compliance and ensures that relevant employees participate in anti-corruption training.

CELADA Fasteners also conducts adequate anti-corruption screening and other due diligence before undertaking any business, either directly or with business partners, in high-risk countries or regions.



ENVIRONMENTAL RESPONSIBILITY

CELADA Fasteners is committed to contributing to sustainable development. At **CELADA Fasteners**, we are aware of our responsibility towards the environment, and we are constantly striving to improve our environmental performance. If we identify that any of our activities may have a detrimental impact on the environment, we take steps to minimize the risk of such impact.



How we hit the target:

- You are responsible for understanding the environmental instructions and requirements of **CELADA Fasteners**. In the event of uncertainty, consult with your immediate supervisor or with your supervisor's superior.
- Follow **CELADA Fasteners** environmental instructions and requirements, as well as applicable environmental laws and regulations, at all times.
- Use water, energy, and other materials and resources sparingly and efficiently in your daily work.
- If an activity requires an environmental permit, ensure that said permit is obtained before starting the activity in question.
- Should you have environmental concerns in your daily work or question any of our processes from an environmental perspective, report the issue immediately. Do not rely on someone else to report the issue.



PROTECTING CONFIDENTIAL INFORMATION

Confidential information related to **CELADA Fasteners** is a highly valuable resource. It may include, for example, non-public information regarding our products, our research and development, our finances, or our strategic plans. To avoid all doubt, we assume that all non-public information constitutes confidential information. All confidential information must be kept confidential and may not be disclosed to third parties without authorization. Unauthorized disclosure or other misuse of confidential information may cause substantial damage to **CELADA Fasteners**. It is important to note that confidential information may be either oral or written, and in physical or digital form.



How we hit the target:

- Do not share confidential, sensitive or derogatory information, either directly with people or indirectly via social media or other channels.
- Do not discuss confidential or sensitive information in public spaces or in places where people outside the company might hear you.
- Do not leave confidential or sensitive information unattended.
- Do not use your personal email account or personal phone for business communications.
- Ensure that you have an appropriate business purpose related to **CELADA Fasteners** before disclosing any confidential information. Ensure, further, that a non-disclosure agreement is in place before sharing any confidential information with any third party.
- Contact your supervisor if you are unsure whether information may be disclosed to a party external to the company.
- It is important to note that your obligation of confidentiality continues even after termination of your employment with **CELADA Fasteners**.



PROTECTION OF COMPANY INTELLECTUAL PROPERTY AND OTHER ASSETS

Company assets

CELADA Fasteners physical and financial assets (including buildings and other property and resources) are of paramount importance to our operations. **CELADA Fasteners** assets must be protected from damage, loss, theft, or misuse and must only be used in the best interests of **CELADA Fasteners**. We all, therefore, have an obligation to use company assets correctly and responsibly.



How we hit the target:

- Follow our local procedures for travel costs and expense reports.
- Do not report personal expenses, such as private travel expenses, as business expenses.
- Protect our company's assets from damage, loss, theft, or misuse by adopting appropriate safeguards.
- Use company resources so as not to cause damage to **CELADA Fasteners** operations.
- It is strictly forbidden to use company computers for illegal or other inappropriate purposes, such as viewing pornographic material or playing video games.
- Always report damage, loss, theft, or misuse of company assets or any suspicion of same to your supervisor.



Intellectual property

CELADA Fasteners intellectual property rights, such as patents, trademarks, copyrights, trade secrets, know-how, domain names, regulatory data, and related rights, are significant assets of **CELADA Fasteners**. These valuable assets could be lost if used or disclosed improperly. Violations of our intellectual property rights could further damage other company assets, as well as the quality of our products and of our reputation. **CELADA Fasteners** will protect our intellectual property, defend our rights if violated, and respect the intellectual property of third parties.



How we hit the target:

- Properly handle the intellectual property of **CELADA Fasteners**, in accordance with instructions, and protect it from any improper disclosure.
- Should you suspect any violations of our intellectual property rights, report those concerns immediately.
- Third-party intellectual property may only be used in accordance with existing agreements with said parties.
- Do not use intellectual property belonging to third parties without prior approval or authorization.
- If you are involved in the development of intellectual property, be sure to follow all company instructions and remember that such intellectual property will remain the property of **CELADA Fasteners** even in the event of termination of employment.



TRANSPARENCY IN ACCOUNTING AND FINANCIAL REPORTING

At **CELADA Fasteners**, we ensure that our financial reporting is accurate, timely, truthful, and transparent. All our financial transactions are recorded and accounted for according to accounting principles that comply with applicable legislation. In this way, we protect our company from fraud and ensure that management can make decisions based on accurate



How we hit the target:

- When you submit, record, or report information, do so accurately and honestly.
- Record all expenses and revenues in the period in which they were incurred or realized.
- Do not misrepresent or manipulate information when recording a transaction.
- Reporting a false or inaccurate expense in order to obtain a refund is strictly prohibited.
- If you approve expenses, make sure they comply with the travel expense policies of **CELADA Fasteners**.
- If you notice an error in our accounting or financial reporting, report it immediately.



How does **CELADA Fasteners** ensure all this in practical terms?

At **CELADA Fasteners**, internal controls to ensure transparency in accounting and financial reporting are conducted primarily by:

- managers and supervisors at various levels.
- the company's auditors.
- By complying with the regulatory framework, **CELADA Fasteners** ensures transparency in accounting and financial reporting.



PERSONAL DATA PROTECTION

In order to respect an individual's right to privacy, we comply with applicable data protection laws and regulations. When we collect, process and store personal information, we do so in a fair and lawful manner, and we are committed to protecting personal information from any misuse.



How we hit the target:

- Be sure to follow national laws and regulations, as well as **CELADA Fasteners** guidelines, when handling personal data.
- Access to personal information is limited to authorized individuals.
- Personal information may only be handled for legitimate business purposes.
- Should you have any questions regarding the handling of personal information, consult with your supervisor or with your supervisor's superior. Personal information is any information that may be used, directly or indirectly, to identify the data subject, such as a name, a personal identification number, contact information, a photograph, location data, or any combination of information.



How does **CELADA Fasteners** ensure all this in practical terms?

CELADA Fasteners informs all employees of the handling of personal information in connection with hiring processes.

CELADA Fasteners also maintains a register of all handling of personal information. This register is regularly updated to ensure compliance with applicable data protection laws and regulations.

More information can be found in the **CELADA Fasteners** Privacy Policy.



CONFLICTS OF INTEREST

A conflict of interest occurs when a personal interest conflicts with an interest of **CELADA Fasteners**. At **CELADA Fasteners**, conflicts of interest and related risks must be avoided in their entirety. We conduct business based on the interests of the company, rather than on personal preferences and considerations, and when we make decisions in our daily work, we do so in an objective manner. To avoid conflicts of interest and related risks, we are all transparent about any interests that could conflict with the interests of **CELADA Fasteners**. All employee interests that result in, or could result in, a conflict of interest must be reported immediately to your supervisor or to your supervisor's superior.



How we hit the target:

- Do not disclose information that could constitute inside information to third parties, including friends and family members.
- Follow **CELADA Fasteners** instructions on the reporting of inside information.
- Do not undertake any side activities outside of **CELADA Fasteners** that could interfere with your job with the company.
- Do not use devices or other property or resources of **CELADA Fasteners** while performing any secondary employment.
- Do not enter into any agreement, on behalf of **CELADA Fasteners**, with a family member or friend or with a company controlled by a family member or friend.
- If you are involved in hiring, consult with your supervisor if you receive a job application from a family member or friend.
- If an actual or potential conflict of interest occurs, disclose that conflict of interest to your supervisor or to your supervisor's superior prior to undertaking the activity or relationship, and work with **CELADA Fasteners** to resolve the issue.



INVOLVEMENT IN POLITICS

CELADA Fasteners remains neutral in relation to political candidates and political parties.



How we hit the target:

- You may support political activities, parties or candidates of your choice, but such support will be at your own expense, not during working hours, and not in the workplace.
- You must not use devices or other property, resources, or assets of **CELADA Fasteners** to pursue your own political interests.
- While personally promoting your own political interests, you must not act in a way that is likely to create confusion as to whether or not you represent **CELADA Fasteners** in those interests.

REPORTING OF ISSUES

Reporting of errors or other issues related to this Code of Conduct

WHEN AND HOW TO MAKE A REPORT

Should you feel that something violates or appears to violate the Code, we ask that you to speak up and raise your concerns. To raise a concern, speak directly with your supervisor. However, if you are uncomfortable speaking with your supervisor, you may:

- Speak with your supervisor's superior.
- Consult with the head of the relevant function, such as Human Resources or the Finance Department.
- Contact HR or the ESG unit if you have any questions about reporting concerns and/or interpreting the Code.
- Report your concerns anonymously.



ACTIONS FOLLOWING A REPORT

- **CELADA Fasteners** will initiate an investigation into the situation and take appropriate action.
- The investigation will be handled promptly, confidentially, fairly, impartially, and objectively.
- All investigations take into account the legal rights of both the person filing the complaint and the person under investigation.
- The individuals carrying out investigations must be impartial and independent and must not in any way be involved in or influenced by the matters under investigation.
- **CELADA Fasteners** will have zero tolerance for any retaliation against you, regardless of the outcome of the investigation, if you have reported your concern in good faith.



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