



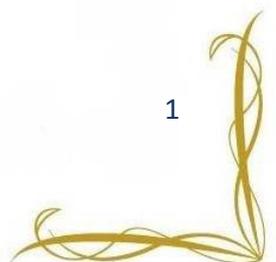
**FIORINI INTERNATIONAL**

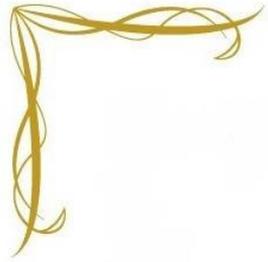
*The Spirit  
and the Letter*

Company Code of Ethics  
Fiorini International Italia spa

*Code of Ethics Rev.03 – July 5, 2019*

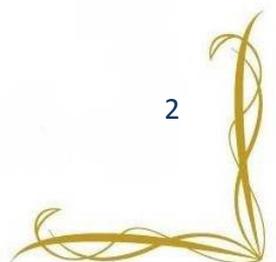
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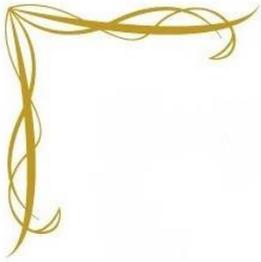




“**Act** in such a way that  
you treat humanity,  
whether in your own person  
or in the person of another,  
always at the same time as an end  
and never simply as a means.”

(I. Kant)





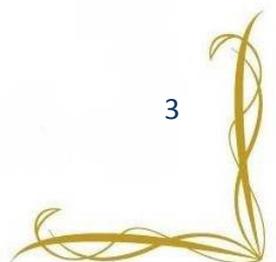
## FOREWORD

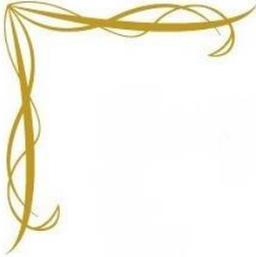
With this *Code*, the management of ***Fiorini International Italia*** aims to reaffirm, in a clear manner, the ethical principles by which it is motivated, and which all of its employees and external partners have the duty to follow in performing the activities relevant to their role and responsibilities.

All employees are required to be aware of and implement the *Code* and to report any deficiencies and/or violations.

Management

Eng. Luigi Fiorini





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## 1. COMPANY and MISSION

The idea for the company began in 1947 with the production of paper packaging for basic necessities. Following the development of consumption patterns, the first business diversification was made in the 1980s with the launch of the production of shopping bags for the retail sector and, later, for the fashion sector.

Fiorini International Italia has now taken on the role as a top-level vehicle for conveying images and interpreting the needs and icons of the largest industrial food groups (salt, sugar, flour, etc.) and major international brands.

Fiorini International Italia's activities are performed at their own establishments in: Trecastelli (Ancona) and Mondolfo (Pesaro and Urbino).

### MISSION

The focus on "Customer Service", in line with the roles and strategic and valuable nature of the human resources operating in the company, represent the core values on which the entire "business system" is based in order to achieve its goals.

Namely:

**Quality of the product and services offered:** through continuous technological development, research and innovation of both the equipment and raw materials.

**Ecological sensitivity:** the strong emphasis on "environmental resources", by using non-polluting materials and components, where possible, and knowing that is possible to "create industry" while respecting the environment.

**Customer orientation:** through supply planning in partnership with its customers, presenting itself as a problem-solver and supplier of services, rather than merely a "supplier of products".

**Respect for people and for organisational and social rules:** the person is always considered to represent a core value and vital source of knowledge and development opportunities. This resource is, therefore, guided and trained in order to strengthen further this fundamental element of the "system".





**Harmony with the social context:** growing in harmony with the area in which Fiorini International Italia operates, and from which it draws its resources, is of fundamental importance to work and strengthen its business, while spreading awareness and support through the prosperity created.

**Efficiency and profitability:** the importance of profit, not only as an indicator of positive company performance, but also as a key social value, which is able to ensure prosperity, as well as collective growth and, above all, future development.

This Code, prepared by the Ethics Committee (see point 2) and approved, in this version, by General Management, came into force in March 2013, after being presented and distributed to all **Fiorini International Italia** employees.

As of the said date, it's presented to new employees and interns at the time of signing the employment or internship agreement.

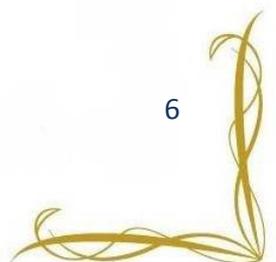
**Fiorini International Italia** undertakes to check for compliance with the provisions of the Code by all of its employees and collaborators.

The Code in force, in the event of any future amendments and/or additions, shall indicate a new version number.

## 2. ETHICS COMMITTEE (hereinafter, the Committee)

The Supervisory Body has been entrusted with the task of enforcing/monitoring and implementing the Code and regulations contained therein. The committee has, in fact, been established to:

- Release the *Code* to all concerned parties as well as provide support in its interpretation and implementation.





- Implement and enforce the Code.
- Verify reported violations of the Code, ensuring that the person reporting the non-compliance is not subject to any retaliation. It is noted that such reports are only considered if submitted in writing and in a non-anonymous manner (subject to the provisions of law, the Committee shall ensure the confidentiality of the notifier's identity).
- Take action, as deemed appropriate, against violations of the Code.
- Update the provisions according to the needs that arise.

The Ethics Committee of **Fiorini International Italia** is composed of:

- General Management
- Human Resources Management
- A workers' representative (freely appointed by the workers themselves)

### 3. GENERAL PRINCIPLES

1. **Fiorini International Italia**, in line with its role as a *Socially Responsible Company*, reaffirms its commitment to promoting new development opportunities, ensuring the protection, as well as the ethical and compatible use of natural and human resources. The company manages and organises its activities in accordance with the legal requirements of the countries in which it operates and in compliance with the principles of the Code.
2. Human resources are the primary asset for the development and success of **Fiorini International Italia**, which is, therefore, committed to protecting and enhancing them in order to increase their responsibilities and positive participation. For this purpose, the company contributes by providing paid information and training tools.
3. The collaborators' privacy is protected under the legal requirements in force. Investigations on the private life of collaborators are not allowed. It is forbidden for anyone to disclose false or misleading information or comments relating to **Fiorini International Italia** and/or its collaborators.





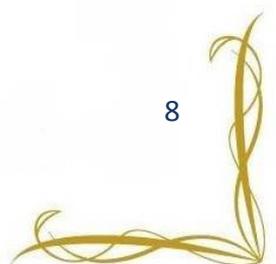
4. The management of the company is required to comply with the Code in proposing and carrying out any projects/activities that are beneficial towards increasing the economic value of the business and the welfare of its employees, stakeholders, customers, suppliers and of the community. The belief that one is acting in favour of **Fiorini International Italia** cannot justify any behaviour that conflicts with the principles of the Code.
5. All Departmental Managers of **Fiorini International Italia**, regardless of their role and contract category, are constantly required to promote the values and principles of the Code.
6. All employees, while performing their activities, shall undertake to comply with the applicable legal requirements, which they are expected to know, together with the related conduct to be followed. In the event of any doubt, they must refer the matter to the Committee who will provide the necessary clarification/information.
7. Systematic compliance with the Code is considered to be an integral part of the contractual obligations of the employees and external partners. Individual behaviour that leads to violation of the rules of the Code shall not be allowed.
8. Should the provisions of the Code conflict with the provisions laid down in the company procedures, the Code shall prevail.

#### 4. CONFLICT OF INTEREST

The most careful attention should be paid to avoid situations where parties involved in transactions may have, or appear to have, a conflict of interest.

In order to avoid this occurrence, it is noted that:

- Any operation/activity shall be undertaken only and exclusively in the interest of the company in a lawful, fair and transparent way.
- Conflicts of interest shall be avoided between personal (or family) economic activities and the functions held within the company.





- It is forbidden to perform any work activities whatsoever (even outside of working hours) for customers, suppliers and competitors of the company.
- It is forbidden to accept personal favours, or money, from individuals or companies that intend to have business relations with **Fiorini International Italia**.
- Any, even apparent, conflict of interest shall be promptly reported to the Committee.

## 5. CONFIDENTIALITY

- **Fiorini International Italia** ensures the confidentiality of the information in its possession, and shall neither seek nor process confidential data (except in the case of explicit authorisation in compliance with the legal provisions in force). In this case, specific data protection procedures are implemented.
- Any other information, data or document, of which employees have gained knowledge during their work, are the exclusive property of **Fiorini International Italia**.
- All employees are required to maintain the strictest confidentiality of the confidential information relating to the company (and/or its employees) of which they have knowledge. Possible exceptions are allowed provided that they are formally authorised by the relevant Departmental Manager.

## 6. COMPETITION

**Fiorini International Italia** bases its competitiveness on the quality of the requested products/services, technical assistance, professionalism and commitment to its collaborators, as well as technological and organisational innovation. The company recognises the value of free and fair competition, refraining from unlawful agreements and oppressive measures.





## 7. RELATIONS WITH STAKEHOLDERS

To quote Freeman (1984) we group our stakeholders in two categories: “Stakeholders ... in a narrow sense, are all those individuals and well defined groups on which the company depends for its survival: shareholders, employees, customers, suppliers, etc.. In a broad sense, a Stakeholder is every clearly identifiable individual who can influence or be influenced by the organisation’s activity in terms of products, policies and workflow. In this broader sense, public interest groups, protest movements, local communities, government bodies, business associations, competitors, trade unions and the press, should all be considered Stakeholders.” Thus, for us:

- The **Primary Stakeholders** are those without whose continuous participation the company would not survive as a functioning ensemble; and they are the shareholders, the investors, the employees, the customers, the suppliers, but also the governments and the communities that supply the infrastructures, the markets, the laws and regulations.

- The **Secondary Stakeholders** include those who are not essential for the survival of the company as well as those who do not wield direct influence on the company itself; therefore, this category includes individuals and groups who, despite not having direct relations with the company, they are still influenced by its activities; for instance, the future generations.

Nowadays, the success of a company is linked to its own social partners and it depends on the quality of the relations among the different groups of Stakeholders, with whom the company interacts, by means of their mutual market of goods and services, or else, comes into contact. Today, it is impossible to manage a company effectively without being able to understand and predict the legitimate expectations of its interlocutors; which is what Fiorini International Italia spa constantly strives to satisfy.

Quality of the products and services offered, environmental protection, safety in the workplace, safeguard of ethical and social values, harmony with the surrounding area and therefore with the neighboring landowners, these are the values that organisations like Fiorini International Italia spa uphold and base their vision on in order to achieve success and to go past the transitional phase from a company vision essentially aimed at profit, to a vision in which companies must make the requests of the different groups of Stakeholders their own.

All this, leads us to believe that the ethical approach based on the globalisation of the activities is the only suitable path towards a sustainable and long-lasting growth both for the individual companies, regardless of their dimensions, and for the community.



Aware of the evolution of the market and of the new needs, not only of the customers but also of all the corporate stakeholders, Fiorini International Italia spa has set up an effective quality system, both ethical and social, that is able to satisfy those conditions which are allowing the company to thrive and grow in the relevant market, perfectly integrated in the community, in the territory and in the internal and external environment

## 8. RELATIONS WITH CUSTOMERS

In the spirit of full and lawful collaboration, relationships with customers shall be based on courtesy, willingness, fairness and professionalism, ensuring fast and efficient responses.

The products and services offered must result in a high level of customer satisfaction, by objectively examining any suggestions or complaints reported.

## 9. RELATIONS WITH SUPPLIERS

With regard to the supply of goods and services, employees shall:

- Comply with company procedures regarding the selection and monitoring of the supplier (including the request for self-certification regarding the acceptance of specific social obligations).
- Refrain from excluding any supplier, in possession of the necessary requirements, from being able to compete in the sale/supply of the necessary products/services (without prejudice to the effort to achieve the greatest competitive advantage for **Fiorini International Italia**).
- Secure the cooperation of suppliers and external partners in meeting business needs in terms of quality, costs and delivery times.
- Comply with, and demand compliance with, the contractual conditions agreed in writing.
- Maintain an open and honest dialogue with suppliers (in line with good commercial practice).



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- Avoid using possible gaps in the contract (or unforeseen events) in order to challenge the contract, by taking advantage of the employment position of the counterparty.

## 10. RELATIONS WITH THE PUBLIC INSTITUTIONS

Any relationship with the Public Administration shall be based on the respect for impartiality, which is also required of the Public Administration, and on the positive development of relations. These relations are reserved only to the relevant delegated functions and responsibilities.

It is not allowed to promise and/or offer goods, services, benefits or favours of value (to managers, officials or Public Administration employees or their relatives) for the purpose of achieving an advantage or benefit for **Fiorini International Italia**. Offering gifts or other benefits of nominal value shall be allowed only if they are in line with legitimate customs.

The addressees of the Code, when undergoing audits and/or inspections by the competent public authorities, shall behave with the utmost willingness and cooperation.

**Fiorini International Italia** does not finance political parties, nor their representatives or candidates, and shall refrain from putting any pressure (be it direct or indirect) on political representatives.

The company may agree to requests for contributions from non-profit organisations and associations with regular statutes and acts.

Sponsorship activities may relate to social and environmental areas, sports, art and culture in general.

It is also noted that **Fiorini International Italia** does not allocate, for purposes other than those for which any contributions were granted, subsidies or public funding.

## 11. GIFTS

*Foreword: without prejudice to the free gifts classified as “acts of commercial courtesy”, a gift*



*refers to any kind of benefit in kind, in cash or in service.*

Gifts which may be interpreted as a means of obtaining favourable treatment for any relationship/activity linked to **Fiorini International Italia** shall not be allowed. The above applies to gifts that are given as well as those received.

## 12. ACCOUNTING AND CORPORATE TRANSPARENCY

- Any transaction, in the broadest sense of the term, must be legitimate and punctually:
  - Authorised
  - Recorded
  - Verifiable
  - Consistent
  - Coherent
- Accounting transparency is based on the accuracy, completeness and authorisation of the basic information for the relevant accounting records.
- For each transaction, the supporting documentation is kept along with the traceable record of the activity performed (each transaction must reflect exactly what is indicated on such documentation).
- All company payments due shall be made according to contractual arrangements and shall not be made to an entity other than the contracting party.
- Any type of falsification or omission of which employees become aware must be immediately reported to the Committee.
- All those responsible for creating the data and information contained in the financial statements, reports or other social communications required by law, are required to verify their accuracy/truthfulness.
- The Directors of **Fiorini International Italia** shall not engage in any conduct which causes damage to company assets or, even potential, damage to creditors.





## 13. STAFF MANAGEMENT

- The selection of staff is carried out while ensuring equal opportunities for all those concerned, on the basis of matching the profiles of the candidates and their specific skills with the needs of the company. The information requested is limited to what is necessary to identify whether the required profile is met, while respecting the privacy and views of the candidate.
- The staff are hired, only if an adult, with regular employment or collaboration contracts, while guaranteeing, the same time, the freedom of association and the right to collective bargaining.  
Every collaborator shall receive complete information regarding:
  - The description of the role and tasks to be performed.
  - The regulations and salary (as regulated by the National Collective Labour Agreement and additional bargaining).
  - The rules and procedures associated with the work activities, to be respected for the purpose of both health and safety and environmental protection, is also required by the policies of the Integrated Management System Safety, Quality and Environment.
  - A copy of the Code in force.
- **Fiorini International Italia** guarantees the right to equal pay for equal work between men and women, and it is company policy to respect the minimum employment age.
- The management of human resources is systematically based on the principles of fairness and transparency, avoiding any form of discrimination or “forced labour”. In terms of work organisation, in line with the technical and production requirements, the preference is for flexibility, ensuring easier arrangements for maternity and childcare.

## 14. EMPLOYEES’ DUTIES

For the purposes of the Code, all employees are required to:

- Set a good example for their collaborators and colleagues, through their own behaviour, by avoiding any form of abuse or discrimination on the basis of:





- Age
- Gender
- Sexual orientation
- State of health
- Race
- Nationality
- Political opinions
- Membership to unions
- Religious beliefs

Any form of harassment and/or discrimination will be prosecuted.

- Act lawfully, securing the services requested in accordance with the obligations laid down under the employment contract and the Code.
- Comply with the provisions laid down by company policies regarding quality, safety and the environment.
- Avoid situations which could lead to conflicts of interest, by promptly notifying their immediate superior where they occur or seem apparent.
- Avoid, to the extent of their authority, duties being given to persons (either internal or external) who are not committed to respecting the Code.
- Contact the Committee, through their immediate superior, in the event of (even doubtful) cases of violation of the ethical regulations or situations which require clarification.

## 15. USE OF COMPANY ASSETS

- Company assets shall be used in strict compliance with the policies and standards regarding health and safety at work and environmental protection.
- All employees are required to use the company infrastructure, resources, tools and materials with the utmost respect, reporting to the Committee any abusive use by other employees.
- All employees are required only to use company equipment for carrying out their duties and tasks (whether performed within or outside the company).





## 16. Glossary

**Code of Ethics:** official company document intended to advise, promote or prohibit certain behaviour independently from legislative provisions.

**Sustainable development:** the principle intended to ensure that satisfying the needs of the current generation does not compromise the quality of life and possibilities of future generations.

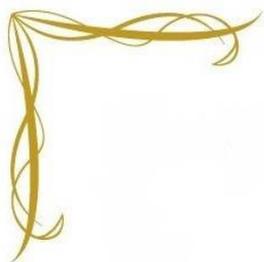
**Concerned parties:** categories of individuals, groups or institutions whose legitimate expectations have an influence on how the company's activities are conducted and, therefore, on the establishment of the company's business mission and objectives.

**Opportunism:** the way of acting of those who take advantage of the work of others to obtain benefits without doing their part in the joint effort.

**Unethical behaviour:** behaviour that compromises the relationship of respect and trust between the company and the concerned parties. This is the behaviour of those who, by taking advantage of positions of power, obtain (or attempt to obtain) benefits from the work of others.

**Reputation (meaning positive reputation, otherwise it is damaging):** a reputation that fosters the relations between all concerned parties (both external and internal), leading to concerted and constructive collaboration.

**Conflict of interest:** a situation that arises when a collaborator an organisation seeks to achieve an advantage which differs from the company's mission and from than the fair distribution of the concerned parties' interests (or seeks to derive personal benefit from the company's business opportunities).



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