

# CleanAir

Your filtration's support

## CORPORATE CODE OF ETHICS AND CONDUCT



## COMPANY CODE OF ETHICS AND CONDUCT

The purpose of the code is to reaffirm to the entire hierarchy of the company, to its staff personnel, its commitment to maintaining ethical behavior in all circumstances, including the following:

- to scrupulously respect the laws in force in the national territory;
- Act fairly and courteously in dealings with colleagues;
- respect the interests of all other parties (customers, consumers, institutions, public authorities and the authorities and the external community); play its role with professionalism and moral and moral integrity, with respect for human dignity. The code also defines the procedures for verifying effective compliance with the operating procedures and penalties for violations by personnel who fail to comply with the "Code of Ethics and Business Conduct".

## MANAGEMENT OF THE CODE OF ETHICS

The rules of the code apply, without exception, to all members of the company, from the employer to all company personnel, as well as operators in specialized collaboration and evaluators.

All members of the company are therefore obliged to receive a copy of the "Code", to be able to consult it, to know its contents and to accept it by a precisely written declaration, and to comply with the principles contained therein. In addition, employees are also required to report any violations of the Code, as explained in more detail in the last section of this document.

## THE COMPANY'S VALUES

The company's "Code of Ethics" is based on the following values:

- Impartiality: confirms and guarantees that there is no threat of impartiality in carrying out the company's business activities.
- Competence: guarantees the commitment to select and motivate human resources in order to ensure the maximum level of competence and updating in the performance of the company's activities.
- Credibility: the company is constantly committed to giving special attention to the trust of all interested parties in the operational credibility, especially with customers, suppliers, consultants, authorities, territorial organizations, and the community in general.
- Achievement of excellence: the company pursues the continuous improvement of the operating mode, paying constant attention to the details in each step of the work, using the resources in the most efficient way, and valuing the employees in their professionalism.
- Social, environmental, and safety responsibility: the company carries out its activity in a responsible way towards civil society, contributing to the progress of the local communities, in accordance with the main role of the company in the region, facilitating the hiring of young operators, helping with safety interventions, even for older employees and in particular in compliance with the regulations concerning maternity and paternity. The company is committed in a safe and responsible way to promote the reduction of the impact of the activity in order to keep it unchanged in the long term. Above all, the company, as far as the environment is concerned, has the will to work with non-polluting products, with procedures that respect the environment, and with interventions adapted and functional to the external system. The company also ensures full compliance with the legislation on health and safety at work with continuous updates, and programs in constant evolution, with reference to the "Progetto Sicurezza" (Safety Project) and the application of the "Sistema Gestione Sicurezza Lavoro Uni Inail" (Management System for Safety at Work Uni Inail).

Clean Air Europe S.r.l.

Via Roma 84 - 23892 Bulciago (LC)

P.iva 03011000134 Tel. +39 031 4153551 | Fax +39 031 4153553

info@cleanairworld.it | www.cleanairworld.it @cleanairworld

## CODE OF ETHICS AND CONDUCT STANDARDS

- Conflict of Interest: In the performance of their work, each employee is required to avoid any possible conflict of interest, with particular reference to personal and/or family interests that could influence the independence of his or her judgment and conflict with his or her responsibilities.

Each employee must immediately report to his or her supervisor and/or the Company's top management any situation that constitutes or may generate a conflict of interest. In particular, the employee must disclose the existence of a stable or temporary employment relationship, or a financial, business, professional, or family relationship, with external entities that may affect the impartiality of his or her conduct or prejudice the propriety of the activities he or she performs.

- Gifts, gratuities, and benefits: It is not permitted to offer and receive forms of gifts or benefits that could be interpreted as exceeding normal business practices and courtesy, or that could be understood as a means of acquiring favorable treatment in the performance of work activities.

Any kind of corrupt behavior toward public officials, officers, or employees of the public administration, authorities, and public institutions, in any form or manner, is not tolerated.

The norms governing the Company's operational activities, within national legislation, must be strictly observed and complied with. The above norms cannot be circumvented by resorting to activities performed by third parties and/or with procedures that circumvent the norms.

By free gifts then, we also mean those benefits that are identified, for example, as offers of participation in seminars and/or training courses with promises of jobs and with transfers out of the Company, to entice the use of materials and/or whatever else.

- Anti-trust regulations: The Company acts fairly in the market, refraining from conduct that abuses a dominant position or compromises free competition.

The Company operates with deontological respect for fellow businessmen.

- Accuracy and transparency of accounting records: The Company operates with the utmost transparency at the administrative and accounting level, guaranteeing truthfulness, accuracy, and completeness of the information regarding each accounting record for each individual construction site.

In order to prevent the misuse of company funds or the recording of fictitious transactions, adequate supporting documentation of the activity carried out is kept for each transaction, such that controls can be carried out to ascertain the characteristics, and reasons for the transaction and identify who authorized, carried out, recorded and verified the transaction. Every employee is required to scrupulously observe all current administrative and accounting procedures.

- Protection of corporate assets: Each employee is required to work diligently to protect corporate assets by properly and responsibly using the tools entrusted to him/her and avoid their misuse.

Every employee must operate, observing the rule of art for care and maintenance.

Then, with reference to the use of IT tools, each employee is required to strictly comply with the provisions of the appropriate IT policy document in order not to compromise the functionality and protection of IT systems.

In summary, it is not permitted to:

- use available tools (programs, e-mail, internet, telephone, fax, etc.) for purposes that are not related to work requirements;
- download programs or install software that is unauthorized, or different from that provided by the company;
- sending e-mail messages that are insulting or that may cause offense to a person and/or damage to the company's image;
- surfing websites with indecorous and offensive content;
- use for one's own personal activities outside of work company equipment.

- Protection of information and intellectual property: company information of any nature (commercial, financial, technological, etc...) represents an asset that the Company intends to protect, as a heritage of culture and continuous technological investment. Therefore, it is forbidden to disclose to unauthorized persons (inside and/or outside the Company) information that could put at risk the professional-commercial assets, acquired over time. The Company intends to apply the requirements of Legislative Decree 196/2003.

- Relationships with personnel - Respect for contract and labor regulations: the Company is committed to respecting fundamental human rights, labor laws, and regulations. In particular, every employee is hired under a regular labor contract and no form of illegal, child labor, or "moonlighting" is tolerated; the Company stresses that it applies the principle of fair competition. A written contract drafted in accordance with applicable national laws is prepared for each employee.

- Personnel relations - Selection, management, and development of human resources: the Company avoids any form of discrimination against its employees/collaborators and adopts objective criteria in the selection, management, and development of human resources. In particular, the Company's evaluation of personnel to be hired, consultants, and evaluators are carried out on the basis of the correspondence of the candidates' profiles, with respect to the Company's needs, while respecting equal opportunities for all stakeholders. The Company is committed to enhancing and increasing the skills of its human resources and aims to offer all company personnel development opportunities on the basis of skills and abilities, avoiding all forms of discrimination, related to age, gender, race, health status, nationality, political opinions, and religious beliefs.

- Protection of moral and physical integrity: All company personnel, whose physical and moral integrity is considered a primary value of the Company, are guaranteed working conditions that respect individual dignity, in safe and healthy working environments. In particular, the Company will not tolerate:

- abuse of power: it constitutes an abuse of the position of authority, to request as a due act from the hierarchical superior, personal services, and favors, or to assume attitudes and/or perform actions that are detrimental to human dignity and especially to the autonomy of the employee;

- acts of psychological violence: attitudes or behaviors that are discriminatory or harmful to the person and his or her beliefs;

- sexual harassment, behavior, or speech that may disturb the personal sensibilities of the worker;

- acts of bullying, which can also seriously impair the health of the worker at the work site;

- operational bullying, which can bring psychological situations with heavy consequences in the worker's operational activity.

The Company is committed to spreading and consolidating a culture of safety, and developing awareness of risks for all its workers since it considers its workers to be a vital force and dynamic sap of how to "do business"; the Company considers it appropriate to proceed with health protocol, apply emphasis of the Italian language, create information and training for its workers, through planning information training (formerly art.9 D.Lgs. 626/94, taken up with D.Lgs. 81/08); the Company stimulates responsible behavior by all employees, adopting suitable work methodologies by ensuring adequate training interventions and operating in full compliance with safety and prevention legislation; the Company intends to use up-to-date, suitable and increasingly lowered technologies to help the employee, in order to eliminate unnecessary workload and/or fatigue situations.

- Protection of privacy: the privacy of personnel is protected by complying with the regulations provided by law and adopting appropriate ways of processing and storing information that the company requires.

Investigations into personal opinions and preferences, and, in general, into the private lives of company personnel are not permitted.

- Relationships with customers and suppliers: Relationships and communications with the Company's customers, are marked by utmost fairness and compliance with applicable regulations, including all accreditation rules, without any recourse to commercially unfair practices. Maximum importance is given to relevant attestation principles of safety and operational prevention.

In purchasing processes, suppliers are selected on the basis of objective criteria, such as price and quality of service, offering each supplier equal opportunity, establishing the principle of cost/value analysis in order to always be able to verify the suitability of evaluation and acceptance.

- Relations with consumers and the media: The Company is committed to guaranteeing consumers an immediate, qualified, and competent response to their needs, providing correct and truthful information on the validity of the certifications issued.

The Company's communication to the outside world is marked by respect for the direct to correct information, accurate and based on transparency procedures, strictly eliminating news, false or tendentious comments. The Company in the successful delivery of the final product attaches all necessary documentation of suitability to the end user.

- Relations with communities and Institutions - Environmental Policy: The Company is aware of the influence, even indirectly, that its activities can have in the conditions, economic and social development, and the general welfare of the community through the continuous creation of work situations so that there can exist the future security of work, family in economic tranquility and thus create the right ring of continuous gestation, with respect to what of right included in the Italian constitution at the level of work, respect for human dignity, entrepreneurial social responsibility.

- Economic relations with parties, trade unions, and associations: The Company with its "Code of Ethics" applied in a vision of careful operational morality does not finance either in Italy or abroad political parties, their representatives, or candidates; it does not make sponsorships of congresses or parties that have a political propaganda purpose. The Company intends to remain absolutely free from any direct or indirect pressure on political figures. The Company does not make contributions to organizations such as trade unions, environmental associations, or consumer protection associations. The Company, however, in the area of just moral concern, may cooperate with such organizations only when the following conditions exist simultaneously:

- purpose traceable to social community respect;
- clear and documentable allocation of resources in a just code of ethics value;
- express and clearly an affirmation of the mentioned organizations for social and community purposes. On the other hand, the Company may instead adhere to requests for contributions limited to proposals coming from Entities and Associations, declaredly non-profit, without human exploitation purposes, without hidden speculative purposes, but with precise and regular statutes, deeds of incorporation that must be attached to any requests for contributions; in any case, the Company may also adhere to those Entities of a medical-humanitarian support nature, of the initiative of national value.

- Relations with Institutions: Relations with the Public Administration, State Institutions must be organized according to precise implications of laws and regulations, without altering the Company's "Code of Ethics". To this end, the Company is absolutely committed to:

- establish transparent, stable channels of communication with institutional interlocutors at the community, territorial, provincial and municipal levels;

- to represent the company's interests and positions in a transparently rigorous and consistent manner, avoiding any attitude of a collusive nature, and always putting the precise code of ethics first for its own business and for the protection of the work of its employees.

Clean Air Europe S.r.l.

Via Roma 84 - 23892 Bulciago (LC)

P.iva 03011000134 Tel. +39 031 4153551 | Fax +39 031 4153553

info@cleanairworld.it | www.cleanairworld.it @cleanairworld

Compliance with the rules of this Code must be considered an essential part of the contractual obligations of employees. It must also be considered an essential part of the contractual obligations assumed by collaborators, including subordinates and/or persons having business relations with the Company.

The Company is responsible for ensuring that its expectations of conduct toward employees are understood and put into practice by them. The Company must ensure that the other commitments expressed in the Code are implemented at the level of the various functions.

## REPORTING A VIOLATION

In order to ensure effective enforcement of the Code, the Company requires all those who become aware of any instances of non-compliance with this Code to make a report.

Employees and collaborators must report any violations or suspicions of violations to the direct supervisor or company functional contact, or, in cases where reporting is not effective or appropriate, they must report directly to top management.

The Supervisory Body is represented by the Company's Owner or Owners, with technical and/or administrative employees and Safety Workers Representative and Prevention and Protection Service owner having autonomous powers of initiative and control.

The Supervisory Board ascertains the merits of the report, timely verifies the news transmitted in due attention, in the possible application of disciplinary sanctions or for the activation of contractual termination mechanisms. The Supervisory Board also ensures that no one in the work environment may suffer retaliation, unlawful conditioning, inconvenience, and discrimination, for reporting the violation of the contents of the Code of Ethics of Conduct or internal procedures.

Any form of retaliation against those who have made reports of possible violations of the Code in good faith also constitutes a violation of the Code. In addition, the behavior of anyone who accuses other employees of a violation, with the knowledge that such a violation does not exist, should be considered a violation of the Code.

## SANCTIONS

La violazione dei principi fissati nel Codice Etico e di Comportamento e nelle procedure aziendali compromette il rapporto di fiducia tra l'Azienda e chiunque commetta la violazione (amministratori, personale aziendale, clienti, fornitori, consulenti, ditte artigianali, operatori specialistici, artigiani e valutatori). Le violazioni, una volta accertate, saranno perseguite, con tempestività ed immediatezza, attraverso l'adozione, compatibilmente a quanto previsto dal quadro normativo vigente, di provvedimenti disciplinari adeguati e proporzionati, indipendentemente dall'eventuale rilevanza penale di tali comportamenti e dall'instaurazione di un procedimento penale nei casi in cui costituiscano reato.

I provvedimenti disciplinari per le violazioni del presente Codice sono adottati dall'Azienda in linea con le leggi vigenti e con i relativi contratti di lavoro nazionali.

Tali provvedimenti possono comprendere anche l'allontanamento dall'Azienda dei responsabili di tali condotte illecite. L'Azienda a tutela della propria immagine e a salvaguardia delle proprie risorse, non intratterrà rapporti di alcun tipo con soggetti che non intendano operare nel rigoroso rispetto della normativa vigente, e/o che rifiutino di comportarsi secondo i valori e i principi previsti dal Codice Etico e di Comportamento.

L'Azienda vuole istituire precisi provvedimenti disciplinari affinché non si creino sul lavoro situazioni abnormi tali da creare discrepanze in una gestione omogenea di comportamento e di procedure. Più precisamente l'azienda introduce a livello di provvedimenti disciplinari:

- rimprovero verbale;
- rimprovero scritto (temporalizzato n° tre volte);
- multa non superiore all'importo di tre ore di retribuzione;
- sospensione dal lavoro e dalla retribuzione fino a tre giorni;

Clean Air Europe S.r.l.

Via Roma 84 - 23892 Bulciago (LC)

P.iva 03011000134 Tel. +39 031 4153551 | Fax +39 031 4153553

info@cleanairworld.it | www.cleanairworld.it @cleanairworld

More specifically, the employer has the power to impose a fine when the employee:  
fails to perform the work according to the instructions received;  
Leaves the workplace without a justified reason;  
Is absent from work without a justified reason;  
introduces alcoholic beverages to the work site, without having prior authorization, in cases of a special nature (anniversaries and/or whatever);  
is found to be intoxicated at the beginning and during work;  
transgresses in any way the requirements of this Code or commits misconduct that impair discipline at the work site;

The Company also informs that it may proceed to dismiss the employee for serious cases committed by the employee and resulting as follows:  
insubordination or insults to superiors;  
theft, fraud, willful damage, or other offenses for which, given their nature, it is made incompatible with even temporary continuation of the employment relationship;  
any culpable act, which may jeopardize the stability of the works, including provisional works, the safety of the construction site, or the safety of personnel and the public constitutes damage to the works, facilities, equipment, or materials; stealing of sketches, tools, or other items belonging to the Principal;  
unjustified abandonment of the workplace by the warehouse or construction site watchman or custodian; and construction site brawling in the workplace or serious offenses toward fellow workers;  
unjustified absence;  
recidivism in any of the offenses that resulted in two suspensions in the previous year; and the previous year.

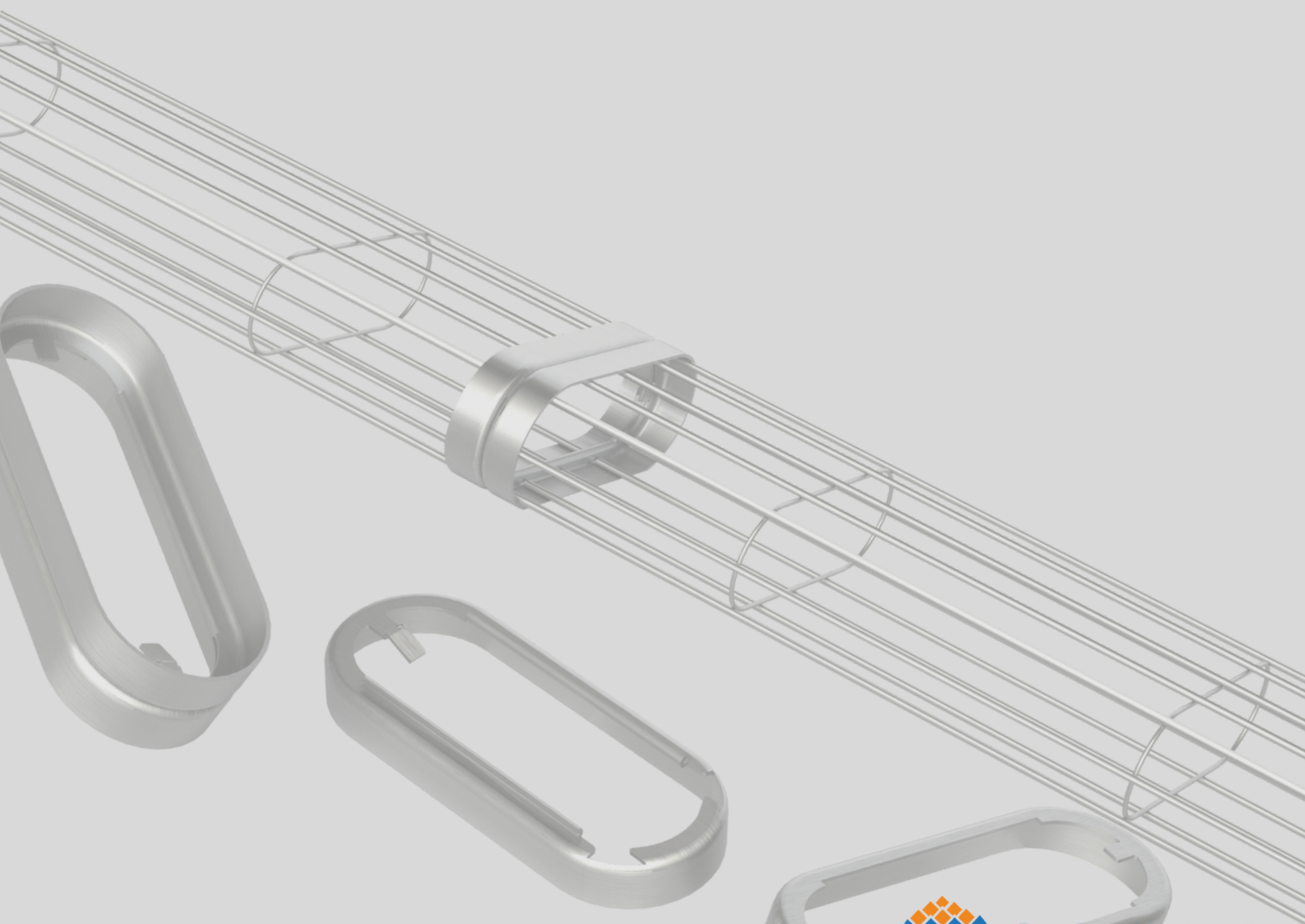
#### DISCLOSURE OF THE CODE OF ETHICS AND CONDUCT

This "Code" issued by the Company is brought to the attention of company personnel and any other third parties who may act on behalf of company assignments. All the aforementioned parties are required to learn and abide by its contents. A copy of the "Code of Ethical Business Conduct" shall be present:

On each work site on view;  
the Company delivers the "Code" with the document "promoting safe behavior" to each individual employee;  
on every company bulletin board must be displayed on the view.

All customers, suppliers, consultants, external collaborators, craftsmen, craft firms, operators in specialized collaboration, all other collaborations provided by external professionals in contact with the Company, all Institutions of any kind and nature always in contact with the Company's operations, all Labor Protection and Prevention Bodies relevant to the Company's business, all territorial political institutions, must peremptorily receive a copy of the "Code of Ethics and Corporate Behavior", so as to understand that the Company has established precise process of welfare, care, safeguarding the work of its staff, to consider a man at the center of the Company's moral and human interest, to bring the principle of social benefit to the external Community as well.

Management undertakes to periodically review the content of this document so as to ensure its adequacy and continuous updating



**ecoSMART**  
Smart connected cages

**ecoATEX**  
Antistatic high performance cages

**ecoHPC+**  
High Performance Coating

**CleanAir** 



Clean Air Europe S.r.l.  
Via Roma 84 - 23892 Bulciago (LC)  
P.iva 03011000134 Tel. +39 031 4153551 | Fax +39 031 4153553  
info@cleanairworld.it | www.cleanairworld.it @cleanairworld

