



COMCOR ENGINEERING
progettazione meccanica 3D

COMCOR Engineering S.R.L.
Via Bramante 1/b – 41043 Casinalbo (MO) Italia
Tel. +39 059 551626
D-U-N-S® Number: 428361885
N° Reg. Imp. di MODENA e P.IVA 02153050360
Capitale sociale interamente versato € 500.000,00
www.comcor.it

CODE OF ETHICS AND CONDUCT

REV	DATE	ISSUED BY
0	19/10/2019	Claudio Orlandini (CEO) Giuliano Montanari (DIR)



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INTRODUCTION

A new version of COMCOR Group Code is now available. Comcor has now decided to put in place stringent rules setting high standards. Any deviation from the rules will not be tolerated.

Our Code of Ethics and Conduct (hereafter, the “Code”) identify proper conduct by providing aims and assistance in our daily work.

We, the Board of Management of COMCOR Group, strongly believe that our Code of Ethics and Conduct is fundamental to creating a Group even more successful in the future.

In fact, it only confirm the pre-existence of shared values of ethics, respect, integrity, responsibility and trust, that daily guide the actions of all Comcor members.

The Code is enforceable to all employees, including managers.

As Comcor employees, it is very important that you acquaint yourself with the Code and keep informed of every update.

As Comcor managers it is fundamental that all Comcor team is trained on the Code of Ethics and relevant policies.

Comcor grants ethics in its daily decision-making process, following the Code’s guidelines.

All employees and manager are obliged to avoid illicit and ethically ambiguous position as well as inappropriate conduct.

In addition, everyone is asked to do not make a decision that could damage Comcor’s reputation.



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OUR FUNDAMENTAL PRICIPLES

1. COMPLIANCE WITH LAWS

Comcor's respectability is built upon its accurate observance of the laws and regulations. Comcor is strictly bind to the letter of the laws governing human rights and labour, enviromental protection, health and safety standards. In addition, we have also enforced internal policies (Code of Ethics and Conduct) and instructions ("Regolamento per la disciplina dell'attività lavorativa e del marcatempo").



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2. HUMAN RIGHTS & WORKING CONDITIONS

Comcor blindly complies with laws governing human rights and labour.

The company recognizes that human rights are intrinsic in all of us, whatever our nationality, place of residence, sex, national or ethnic origin, colour, religion or any other status, as per Universal Declaration of Human Rights.

Comcor promote the elimination of all illegal, forced or mandatory labour, and in particular child labour, as per European Union Charter of Fundamental Rights and International Labour Organization Conventions no. 138-182.

Illegal, forced or mandatory labour at Comcor's suppliers is prohibited.

Comcor enforces appropriate wage and benefits to its employees, including paid sick days, vacation days, family leave and medical insurance.

The company supervises the observance of regular workweeks, ensuring that all overtime is voluntary.

2.1. FREEDOM OF ASSOCIATION

As per Art. 11 of The European Convention on Human Rights, Comcor recognizes the right of its employees to freedom assembly and association with others, including the right to join trade unions.

Comcor is extremely open to dialogue and available for debate. We believe that different ideas play a fundamental role for the company. In fact, all ideas are an important source of improvement for the Company.

2.2. HARASSMENT

As per International Labour Organization Convention no. 190, Comcor condemn every sort of harassment in the world of work and business because it is conflicting with a decent condition of working.

Harassment constitutes a dangerous threat to equal opportunities and to maintain a safe, healthy and productive working environment.

Comcor does not tolerate any form of harassment or bullying whether sexual, physical or psychological, either from its suppliers.

2.3. NON-DISCRIMINATION

According to the European Union Charter of Fundamental Rights, freedom from discrimination is a fundamental human right.

Comcor defends equal treatment of individual or groups regardless their particular characteristics, including gender, race, colour, ethnic or social origin, religion and political belief, disability, age or sexual orientation.

In addition, the recruitment process is based on the applicant's experience and skills, as well as remuneration.



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3. ENVIROMENTAL, HEALTH AND SAFETY POLICY

Comcor's scope is to develop all the activities, granting employees' health, safety and environmental protection as fundamental value.

3.1. HEALTH AND SAFETY

Comcor is committed to granting and promoting a safe and healthy work environment at all its sites. We blindly ensure the observance of the applicable laws and regulations by all our employees and our suppliers.

The company plans to accomplish simple goals: zero incidents and no damage to the people or the environment.

A special effort is made to pursuing our goals:

- Granting employees with a safe and healthy workplace, adopting the best habits to eliminate incidents or illnesses.
- Furnishing employees with all necessary PPE (shoes, helmets and glasses)
- Educating employees through periodic first aid courses and taking safety training.
- Publishing regular instructions to be followed in case of emergency.

3.2. ENVIROMENTAL PROTECTION

All Comcor activities (manufacturing, installation, design) aim to minimum dissipation of energy, removing dangerous products and preferring materials that can be recycled.

Our Company is also committed to minimize the greenhouse gas emissions, with the purpose of reduce the environmental impact, saving resources and costs.

Comcor recognize the importance of sensitize all its employees to support this collective effort in their daily activities.



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4. BUSINESS ETHICS

4.1. DATA PRIVACY

As per the Universal Declaration of Human Rights, no one shall be subjected to arbitrary interference with his privacy.

Comcor and all its employees comply with laws and regulations concerning privacy and protection of personal data.

Our company does not allow the distribution of personal information to third parties. As Comcor employees, the right of access to another's personal data is strongly restricted according to the nature of the individual function and responsibility.

4.2. INTELLECTUAL PROPERTY

Comcor's intellectual property rights include patent, rights in invention and design, rights in information (including know-how and trade secrets) and all rights existing at the moment or in future, everywhere in the world.

All Comcor employees are committed to preserve these resources. Comcor and all its employees recognize and respect the Intellectual Property of others.

