



**COMCOR ENGINEERING**  
progettazione meccanica 3D

COMCOR Engineering S.R.L.  
Via Bramante 1/b – 41043 Casinalbo (Modena)  
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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](http://www.comcor.it)

# CODE OF ETHICS AND CONDUCT

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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.

#### - ETHICAL POLICY

In addition, the recruitment process is based on the applicant's experience and skills, as well as remuneration. It is Comcor's responsibility to ensure that recruitment practices are ethical, unbiased, and inclusive.





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### - **WOMEN’S RIGHTS**

Comcor do not discriminate or tolerate discrimination on grounds of gender.

According to national laws (Italy) and national contacts, Comcor ensures women’s rights about maternity leave and children care.

In addition, remuneration is based on applicant’s experience and skills, not on gender.

### - **RIGHTS OF MINORITIES AND INDIGENOUS PEOPLE**

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.

With reference to indigenous people, they are not present in Italy.





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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.

#### - 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 (for example, in case of fire emergency, the company has determined no. 5 "Fire protection Areas" as a safe meeting point for employees. Please see Doc. 1 and Doc. 2 attached.

#### - WORKPLACE ERGONOMICS POLICY

Comcor ensures fitting workplace conditions according to the capabilities of the employee.

The company considers the capabilities and limits of the worker as he or she interacts with tools, equipment, work methods, tasks and the working environment. A goal of ergonomics is to reduce work-related musculoskeletal disorders by adapting the work environment and providing educational information to fit the person.

Employees are encouraged to have open communication with their supervisor if they experience health issues that they believe could be related to their workspace ergonomics.

#### - MACHINE POLICY

- a. Comcor trains all employees extensively on every machine present in the warehouse.
- b. Employees must wear personal protective equipment.
- c. Employees never work alone.
- d. Paths between machines and all exits must be clear. This eliminates the potential that an employee trips on tools or is unable to exit in the event of an evacuation or emergency.
- e. Employees must report all injuries to management, even small instances that may seem insignificant.

#### - ENVIROMENTAL AND ENERGY PROTECTION

All Comcor activities (manufacturing, installation, design) aim to minimum dissipation of **energy**:





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- using more efficient technologies and lighting systems to consent an integrated and more structured management of energy consumption
- taking advantage of the natural light

#### - RENEWABLE ENERGY AND RECYCLING

With reference to the **environmental protection**, our Company is committed on removing dangerous products and preferring materials that can be recycled.

Our Company is focusing its efforts on minimizing the **greenhouse gas emissions**, with the purpose of reduce the environmental impact, saving resources and costs:

- using **renewable energy** as solar panel to power the company warehouse
- using technologies to support interaction between employees
- reducing business travel

Comcor recognize the importance of sensitize all its employees to support this collective effort in their daily activities, through guidelines and programmes to reduce the consumption of paper, plastic, toner, energy and promote waste sorting.

The Company is committed on monitoring and assessing environmental impacts to identify and implement improvement measures through the attached file “**ENVIROMENT AND ENERGY MANAGEMENT**”, which includes water, energy, gas emission, garbage and chemical product management.

Comcor specifies that while company’s water daily use relates to sanitary use (no industrial use) we still recognize the importance to sensitize all employees to avoid **water waste**.

With reference to **air quality**, the Company guarantees daily air exchange, both within office room and within the Warehouse.

#### - CHEMICAL AND BIOLOGICAL SUBSTANCES

Responsible chemical and biological management is not applicable, because Comcor **does not use or sell chemical or biological products**.





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## 4. BUSINESS ETHICS

### - 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.

### - 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.

### - COMPETITION AND ANTI-TRUST

Comcor prohibits any anti-competitive business practices, recognizing the fundamental importance of a competitive market and is committed to comply with any antitrust and other pro-competition legislation in force in the countries where it operates.

Comcor workforce members will work vigilantly to avoid business practices that represent an antitrust violation.

### - CORRUPTION AND BRIBERY

Comcor prohibits corruption, the receiving of gifts, invitations, advantages or payments between private parties.

All of the workforce must ensure that any gifts or invitations they give out are appropriate and reasonable, in a manner that would not influence improperly the judgement or the conduct of any external party. Transparency is the golden rule.

### - CONFLICTS OF INTEREST

As Comcor's Workforce, we owe The Company our best efforts, dedication and loyalty, and this means avoiding Conflict of Interest whenever possible. A Conflict of Interest is not always easy to detect, however. Usually a Conflict of Interest involves the pursuit of a personal interest that may drive our loyalty away from the best interests of Comcor.

A second job is a potential Conflict of Interest because Comcor Workforce members who work at a second job may not have the energy, availability or loyalty necessary to deliver their best effort for Comcor. Secondary employment is not always a Conflict of Interest, and even if it is, depending on the





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circumstances, may be approved.

#### **- DISCLOSE OF INFORMATION**

Comcor does not admit any disclosure of information about work activities.

Comcor No Disclosure Agreement, signed at the end of hiring process, binds all employees.

#### **- WHISTLEBLOWING POLICY**

If you see anything that you think may be a violation of the Code, we ask you to speak up to support the highest levels of integrity and ethical behaviour.

Reporting these matters is completely safe. The Company will always protect you from any kind of retaliation.

#### **Purpose**

In line with local legal requirements as well as in order to incorporate the culture of integrity into the day-to-day operations, Comcor has developed this Whistleblowing Policy.

The purpose of this Policy is to define the applicable rules for the receipt and management of any concerns regarding potential violations of the Code.

#### **Scope**

The application of these rules applies to everyone in Comcor, at every level.

#### **Responsibilities**

Comcor Compliance Department (CCD) has responsibility for the Policy as well as investigations related to ethics and compliance concerns.

Incoming reports are sent to certain expressly authorized and specially trained employees of the Department that are authorized to conduct investigations regarding concerns about potential violations to the Code.

CCD's people are impartial and independent.

#### **Channels**

Any concerns or potential violations of the Code must be reported through one of the available channels: the direct supervisor, the Human Resources and the Comcor Compliance Department ([comcorcompliance@comcor.it](mailto:comcorcompliance@comcor.it)).

#### **Anonymity and No Retaliation**

The Policy permits anonymous reporting. However, it is recommended for the reporters to identify themselves. All reports received will be treated confidentially.

Anyone who retaliates against a person who reports a concern in good faith will be subject to disciplinary action.

#### **Case Management**

All reports received through any of the available reporting channels will create a case number and will be reviewed by CCD.

A reporter will be able to require information, provide more details or track the progress of a case.

Confirmation of receipt is provided to the reporter. Furthermore, information concerning the status of the investigation and the final outcome are communicated to the reporter.

Approximated managing time: 3 working days

#### **Case Evaluation and Resolution**





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Reports will be investigated by Comcor Compliance Department, which can rely on the assistance of Human Resources to achieve an effective and efficient resolution of cases.

### **Disclosure of Conflicts of Interest**

Comcor workforce is required to disclose, through the CCD, actual or potential conflicts of interest, as defined in the Comcor Code of Ethics and Conduct.

### **- COUNTERFEIT PARTS PREVENTION**

Comcor is committed to prevent the purchase and use of counterfeit parts:

- Procuring parts from reliable sources
- Assuring authenticity and conformance of procured parts
- Reporting potential counterfeit parts to Competent Authorities

### **- SUPPLIER SUSTAINABILITY POLICY**

Comcor also encourages the adoption and sharing of sustainable practices among our suppliers. The Company is committed to sustainable practices in its procurement activity. The selection of suppliers is based not only on the quality and on competitiveness of their products and services, but also on their adherence to social, ethical and environmental principles, maintaining the highest standards of quality, and taking care of the communities in which we do business. In fact, all the aspects above are required to our Suppliers.

