



Code of Ethics and Code of Conduct

DEMAC SRL operates on the market with the aim of promoting employment, fostering opportunities for professional growth, creating value for members, satisfying customers and enhancing all the people who work there. This code expresses the ethical commitments and responsibilities in the conduct of business and corporate activities undertaken by managers and employees and by all those who directly or indirectly establish relationships in the name or in the interest of the company.

ETHICAL VALUES

DEMAC SRL conducts its activities inspired by the principles of correctness, transparency, legality and clarity. All company activities must be carried out with the utmost scrupulousness, honesty, loyalty and professional commitment, in compliance with the laws, procedures, company regulations and in compliance with the Code of Ethics. In particular, management and managers must behave in an exemplary manner towards employees, promote respect for company regulations and in compliance with the Code of Ethics. In particular, management and managers must behave in an exemplary manner towards employees, promote compliance with the rules of the Code of Ethics and commit themselves to ensuring that compliance with the rules of the Code of Ethics is a substantial part of the contractual relationship.

CRITERIA OF CONDUCT

Relations with external contractors

Employees who have business relationships with third parties must conduct the relationship in a fair and correct manner. These principles are valid for customers, suppliers, consultants and persons who carry out any activity directly or on behalf of the company.

Relations with suppliers

The selection of suppliers and the formulation of the conditions for the purchase of goods and services are carried out on the basis of criteria based on economy, quality and transparency, granting equal opportunities to all suppliers. In the event that the supplier, in carrying out its activities, adopts conduct that is not in line with the general principles of this code, the company is entitled to take appropriate measures until the conclusion of the collaboration relationship. In the choice of suppliers, there is no pressure to favour one supplier over another. It is not permitted to give or receive in any form, direct or indirect, offers of money or gifts to obtain any personal advantages.

Customer Relations

DEMAC's goal is to meet customer expectations and to always treat customers correctly and honestly, to keep a quality service for its customers and periodically monitor the perceived quality.

Relations with the institutions

Relations with the Institutions, which are necessary for the development of company business, are reserved exclusively for the persons delegated to do so. They are based on maximum transparency, clarity and fairness.

Commercial relations with the Public Administration

Relations with the Public Administration are managed with the utmost correctness, transparency and rigor. Behaviour that leads to false or ambiguous interpretations is not tolerated.

Relations with political and trade union organisations

DEMAC SRL does not directly or indirectly devote money to political parties, movements, political and trade union organisations, their representatives and candidates, except if due by the laws and regulations in force.

External relations

DEMAC SRL recognises the primary role of clear and effective communication in external relations. Employees in charge of disclosing company information externally, in the form of speeches, participation in publications or any other form of presentation, must comply with company regulations and receive the prior authorization of the company's top management or a delegate.



Relations with the mass media

External communication is based on respect for the right to information. Communications must be truthful, clear, transparent, unambiguous or instrumental, in accordance with company policies and programs. Relations with the mass media are reserved exclusively for the top management and/oris delagate. Employees must refrain from issuing formal or informal communications outside the company and take care to communicate to authorised persons and/or delegate any questions put by media.

Gifts and presents

Employees may not, directly or indirectly, offer or receive gifts, money, payments, presents of any kind. The gifts have the sole purpose of promoting the corporate image. Any form of gift that goes beyond normal commercial practices, or in any case aimed at acquiring preferential treatment in the conduct of any activity connected or connectable to the company, is not permitted.

Employee relations

DEMAC SRL protects and promotes the value of human resources in order to improve and increase the skills possessed by each collaborator.

Personnel selection

DEMAC SRL evaluates the personnel to be hired on the basis of the correspondence between the characteristics of the candidates and the profiles necessary for the company's needs, in full compliance with equal opportunities. It takes appropriate measures to avoid favoritism, nepotism, or forms of clientelism.

Establishment of the employment relationship

DEMAC SRL hires staff with a regular employment contract. No form of irregular work is allowed. When the employment relationship is established, each employee receives accurate information on: characteristics of the function and the tasks to be performed, regulatory and remuneration elements based on current legislation, rules and procedures on safety in the workplace.

DEMAC SRL rejects any form of discrimination against its employees. Access to roles and assignments is established, considering skills and abilities.

CONDUCT IN THE WORKPLACE

Conduct

Each employee is required to perform his or her duties responsibly, honestly, diligently and in accordance with company policies, procedures and directives.

Mutual respect

DEMAC SRL promotes an internal climate in which employees interact in full mutual respect.

Safety and health

DEMAC SRL is committed to managing its activities in full compliance with current legislation on prevention and safety at work and strives to ensure a healthy and safe working environment, by adopting all the necessary measures.



CONFLICT OF INTEREST

General principles

DEMAC SRL bases its relations with its employees on mutual trust and loyalty. Employees must pursue, in the performance of their work, the company's objectives and interests, avoiding in any way to put themselves in situations that conflict with the social interest.

External work activities

Employees and collaborators must avoid all those activities that are in conflict with the company's interest, with particular reference to personal or family interests that could affect independence in carrying out the activities assigned to them with risks on the achievement of the best corporate interest. It is therefore mandatory for each employee and collaborator to report situations of conflict of interest.

Use of internal information

Employees who, in the normal performance of their business activities, become aware of confidential information relating to the Company may not use it for personal, private or economic purposes. Such uses, in addition to constituting a moral and ethical issue, are legally prosecutable.

VIOLATIONS

In the event of ascertained violations of the provisions of the Code of Ethics, appropriate sanctioning measures will be adopted in line with the provisions of the national collective labour agreements. Each employee must report any information relating to violations of the Code to his or her direct superior. If, for justified reasons or for expediency, it is deemed inadvisable to refer directly to one's hierarchical superior, it will be the employee's responsibility to communicate directly with the Chief Executive Officer and/or the Board of Directors. All requests will be promptly considered without risks for the employee of suffering any form, even indirect, of retaliation. Anyone who reports alleged violations of the Code of Ethics not in good faith will be sanctioned under the same.



Human rights

DEMAG SRL is constantly committed to respecting internationally recognized human rights principles in all its operations. This policy is based on the United Nations Guiding Principles (UNGP) on human and trade rights, the Universal Declaration of Human Rights (UDHR) and the International Labor Organization's (ILO) Declaration of Fundamental Principles and Rights at Work.

DEMAG SRL is committed to respecting the human rights principles recognized by governments that intend to promote and protect human rights in the countries in which it operates. It recognises that governments have a responsibility to establish the legal framework to protect human rights in their jurisdictions.

In compliance with the commitment and in accordance with the practice and applicable law DEMAG SRL

- does not tolerate and is committed to eliminating all forms of forced labour, child labour and discrimination in the work place;
- works to impose safe and unsafe working conditions;
- values diversity as a key element for the success of its business strategy;
- seeks to reward its employees fairly and competitively;
- it respects the principles of free association and the right to collective bargaining.

It promotes and respects the rule of law and applicable law in the countries in which it operates. It maintains policies and procedures relevant to developing its operations. DEMAG SRL expects its business practices to be enforced in accordance with applicable law, the policy and its values.

This policy supports DEMAG SRL's vision of creating a work environment that everyone can be proud of, being a company that others respect and admire, and contributing to a world made better by its actions.

DEMAG SRL boasts a wide and diverse network of suppliers and business partners.

It is committed to working with these parties to uphold the principles in this policy and encourages them to evaluate their activities and develop an approach to respect for human rights. DEMAG SRL hopes that suppliers will comply with the obligations indicated in the contractual phase.

Integrity, commitment, excellence, teamwork and sustainability characterize the work of DEMAG SRL. The company has been committed to establishing mechanisms to identify, address and mitigate the potential impact on human rights in the places where DEMAG SRL operates.

DEMAG SRL is used to engage with internal and external stakeholders to understand the problems and worries associated with human rights and to correct any activities that are not in line with this policy. DEMAG SRL will assess human rights issues and worries related to business activity in accordance with the law, policy and its code of conduct and, in this way, will act in accordance with its values.

DEMAG SRL incentivizes here

It recognises that governments have a responsibility to establish the legal framework to protect human rights in their jurisdictions.



DEMAC SRL encourages any party to report situations in which they believe in good faith that the entities or individuals covered by this policy have taken inconsistent actions with the principles of this policy. Anonymous and confidential means have been created to encourage parties to report any incidents. The company adopted the Whistleblowing procedure and the same was communicated to internal and external stakeholders.

DEMAC SRL will not take any action against a party, following a report of a problem in good faith consistent with this reporting process. In addition, DEMAC SRL does not tolerate any retaliation by an individual against a party for reporting a problem in good faith.

Magenta, 12.01.2024