

CODE of CONDUCT

INTRODUCTION

Our company was founded in 1995 with the aim of introducing scientific instruments to the market, selling and/or manufacturing a range of products to meet the needs and requirements of the market, continuously pursuing technological and quality improvement with an appropriate quality/price ratio.

Our motto 'the pleasure of working together' is the driving force behind all our activities and corporate values.

We would like to reiterate and summarise our values in this Code of Conduct (hereinafter also referred to as the 'Code'), which we have adopted in order to regulate the set of rights, duties and responsibilities that we assume towards our stakeholders, understood as all the subjects with whom we relate in the course of our activities.

Our Code of Conduct is not intended to replace existing local legislation and policies, but to explain the value context within which our policies are developed, in order to set out their logic and purpose.



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APPLICATION OF THE CODE OF CONDUCT



Our results are closely linked to the relationship of mutual trust that we have established with all those who contribute to our activities on a daily basis, based on the sharing of values expressed and compliance with the regulations contained in this Code of Conduct.

We believe that any organisation that wishes to act legitimately within the society and its environment has a duty to communicate its ethical principles in a clear and transparent manner; our Code sets out and expresses our corporate values, rights, duties and responsibilities towards any interlocutor inside or outside the company, in order to maintain high standards and minimise the risk of committing offences and malpractices in the performance of our activities.

The regulations contained in the Code integrate the law, which must always be respected. They are also intended to provide guidelines in the solution of certain situations that present significant ethical impacts, containing all the fundamental rules of conduct that Giorgio Bormac requires all collaborators, at any level and in the performance of any work activity, to comply with.

We constantly invest in a company climate characterised by transparency and trust, and it is our responsibility to make the regulations governing our professional activities known and disseminated.

In order to help all employees perform their duties successfully and in accordance with the company's rules and ethical principles, the Management and Managers are called upon to set a personal example and ensure that their teams apply and comply with the Code. We reserve the right to periodically amend its content, to adapt it to regulatory developments and to the application experience gained, to which we are all obliged to contribute.

We commit to disseminate the content of the Code and the amendments that will be adopted through the adoption of specific internal initiatives and means of sharing, as well as through internal communication tools and through the Sustainability section of our website www.giorgiobormac.com.

We are committed to ensure compliance with the Code, preparing appropriate prevention and control tools, ensuring the transparency of the actions and conduct implemented, intervening, if necessary, also with sanctions.

1.2 RECIPIENTS



The Code defines the lines of conduct that we are required to follow as we act in the name, on behalf, and in the interest of Giorgio Bormac, regardless of legal status.

We define as recipients all those who are stakeholders such as suppliers, consultants, dealers, partners and employees. As recipients, we are bound to respect this Code of conduct and to conform our activity to the fundamental ethical principles by which the company is inspired, in absolute compliance with the laws and regulations in force.

1.3 IMPLEMENTATION PRINCIPLES



We at Giorgio Bormac are committed to observing and enforcing the principles of the Code of Conduct that we have drawn up. In particular, the Chairperson of the Board of Directors and all the associates are the first to set an example of consistency between the Code and daily behaviors

We consider it essential and inherent in the company's contractual obligations to observe the principles of the code, always complying with the regulations in force.

We aim to act with integrity, loyalty and a sense of responsibility. In particular, we must ensure that we do not get involved in situations that could be illegal or harmful.

We provide for the adoption of an appropriate disciplinary system to sanction non-compliance with the Code of Conduct by the recipients, and we undertake to ensure compliance with and proper implementation of what is set out in the Code.

Therefore:

- we collect reports of alleged violations;
- we carry out the appropriate investigations and report the outcome to management for them to assess the appropriate sanction to apply;
- we guarantee the confidentiality of the identity of the person who reported the breach of the Code, so as to protect the person from possible retaliation.

Anyone involved in acts of intimidation or retaliation against those who make reports in good faith to the relevant department will be prosecuted with disciplinary action, including possible termination of employment.

Communications such as the reporting of alleged violations, requests for clarification or advice may be sent, by employees and all other stakeholders, using the form at the following link

[Complaint](#)

Address:
Giorgio Bormac S.r.l. - 25 Via della Meccanica,
41012 Carpi (MO)

The
CORPORATE
MISSION
and
FUNDAMENTAL
ETHICAL
PRINCIPLES



2.1 THE MISSION

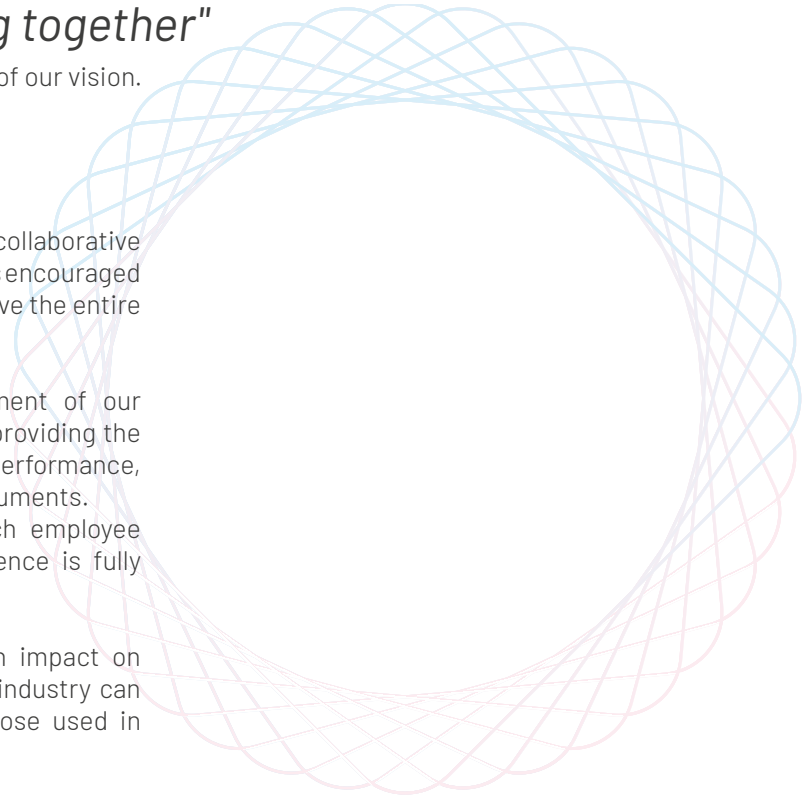
"The pleasure of working together"

is the phrase that represents the essence of our vision.

For us, it means creating a serene and collaborative working environment, where everyone feels encouraged to express their knowledge in order to evolve the entire company.

We strive for the continuous improvement of our products and capabilities, in the hope of providing the entire community with increasingly high-performance, accessible and sustainable scientific instruments. We do this by taking the needs of each employee to heart, ensuring that the work experience is fully compatible with personal needs.

We like to believe that our work has an impact on people's lives: our tools used in the food industry can help make a meal taste better, while those used in healthcare can even help save a life.



2.2 STAKEHOLDERS

Relations with our stakeholders are based on criteria of fairness, cooperation, loyalty, compliance with the law and mutual respect.

We consider the following as relevant stakeholders for the realisation of our mission: retailers, employees, suppliers and partners, associations, the local community and the public administration.

2.2 FUNDAMENTAL ETHICAL PRINCIPLES AND GUIDELINES

We adopt as an inescapable principle compliance with the laws and regulations in force, to which we add the ethical principles listed below as an integral part of the company's activities:

Respect for people and fundamental rights

We are committed to respecting the rights, physical, cultural and moral integrity of all people. We express the centrality of the person through the valorisation of employees and collaborators, in order to increase the wealth of skills of each of them and guarantee them working conditions that respect individual dignity in a healthy, safe and non-discriminatory working environment.

We hold ourselves to an appropriate and respectful language both in company environments and in interpersonal working relationships, in order to guarantee a polite and respectful relationship between people in whatever position in the company they find themselves

Retailer/partner orientation

We pay the utmost attention to satisfying the expectations of our dealers/partners, offering a constantly improving and updated product catalogue, and offering a competitive price/quality ratio, especially for products developed and marketed under our own brand.

Honesty and fairness

Our management, employees and associates carry out their activities in pursuit of the company's interest. The pursuit of that interest can never justify conduct contrary to the principles of honesty and fairness.

Principle of equity

We are committed to operating in a fair and impartial manner, condemning and rejecting any discrimination on the basis of age, gender, sexuality, state of health, nationality, political opinions and religious beliefs of our interlocutors, in our contacts with retailers and the public administration, in personnel management and in the selection of suppliers.

Fair Competition

We firmly believe in fair and equal competition and refrain from any form of collusive behaviour or abuse of a dominant position that could violate the principle of fair competition. We guarantee active cooperation in investigative procedures and to not conceal or delay any information requested by the antitrust authorities and regulatory bodies.

Transparency in activities

We are committed to ensuring timely and truthful information in our relations with the various stakeholders and in reporting on the economic, social and environmental impact of our activities. We also ask that the recipients of this Code of Conduct undertake to provide adequate and timely information both outside and inside the company, guided by the principles of fairness and transparency in negotiations with suppliers and the Public Administration.

Respect for the environment

We are committed to carrying out our activities contributing to the development and well-being of the environment in which we operate, constantly pursuing environmental protection, the health of employees and of the community affected by the company's activities.

Safeguarding relations with local institutions

We are aware that we are a small company, but we believe that small gestures can still help local associations, charities and the local community. With this spirit we carry out our activities in the area and in the reality in which we operate.

We strongly believe in our ethical principles and, for this reason, we know that we can give our contribution by participating in the challenge set by the United Nations, through the achievement of the global Sustainable Development Goals (SDGs) that we will share and keep updated in the Sustainability section of our website
www.giorgiobormac.com

RULES OF CONDUCT



3.1 THE RELATIONSHIP WITH THE RETAILER



The continuity of our business is closely linked to the quality of our products and the satisfaction of our dealers and partners, which are the fundamental pillars of our company.

For this reason, we at Giorgio Bormac have as our top priority the satisfaction of our resellers'/partners' requests and pursue continuous improvement in being able to respond to their needs, a professional relationship inspired as much as possible by a model of maximum reliability and transparency.

To this end, we consider it fundamental :

Attention to retailer/partner needs

We listen and respond to the needs of our resellers and partners, with the aim of creating a privileged relationship with each of them and guaranteeing continuous improvement in the quality of the products we offer, providing the information needed to make a report or complaint, and following up on their requests effectively. We monitor reseller/partner satisfaction annually and collect any suggestions for improvement.

Clarity in communication

We give truthful, clear and timely information on the features, functions and prices of our services and catalogue products, we repudiate any form of misleading advertising and present our products in a transparent manner.

The protection of dealers' information

We ensure that any information held by Giorgio Bormac concerning our dealers/partners is handled and used in full compliance with the law, according to the principle of confidentiality of personal data as per GDPR 2016/679.

Giorgio Bormac undertakes to promptly inform its resellers and partners if, where required by law or authorised by contractual agreement, it finds itself in a situation where it has to disclose confidential information.

3.2. THE RELATIONSHIP WITH CO-WORKERS

At Giorgio Bormac, we place great emphasis on the professional development and workplace safety of our employees, within a culture of responsibility and cooperation.

Fundamental Rights

At Giorgio Bormac, we place great emphasis on the professional development and workplace safety of our employees, within a culture of responsibility and cooperation.

Protection of equal opportunity

We promote diversity in the assessment of applications and selection of personnel and are committed to non-discrimination of any kind in employment and occupation, offering fair professional opportunities to all profiles, respecting the principle of equal opportunities and equal treatment in employment.

Health and safety in the workplace

We at Giorgio Bormac are committed to ensuring that all our employees can work within a healthy and risk-free working environment to protect their health and safety. For this purpose, we implement risk prevention procedures aimed at reducing accidents at work and we are responsible for providing adequate training to employees so that they are all put in the best possible position to know about and curb any risks for their health.

Protection of information and conflict of interest

Employees of Giorgio Bormac must not find themselves in situations where their personal interests or those of their families or close relatives may conflict with the interests of the company or may risk damaging the company's independence of judgement, professional integrity, image or reputation. Such situations represent a conflict of interest.

We request employees not to disclose confidential information belonging to the company and of which they may become aware in the course of their work activities and of which they are to be considered mere repositories, until it is made public by Giorgio Bormac. For this reason, employees are requested not to use or disclose such information unless expressly authorised or required by law. Similarly, Giorgio Bormac is committed to respect and ensure the confidentiality of the individual information of our collaborators, our suppliers and those who have provided information necessary for the performance of activities related to us, making use of such information limited to the purpose for which it was collected, in compliance with applicable national regulations.

Respect for company assets

All of us at Giorgio Bormac are required, in the performance of our activities, to safeguard the company values and assets entrusted to us and to contribute to the protection of the company's assets, avoiding using company resources, assets or materials for personal advantage or improper purposes.

Protection of the company name and image

Employees appearing at meetings or public events are requested to act in their personal capacity only and to not use the name and trademark of Giorgio Bormac or its brands represented in product catalogues, except when expressly authorised.

Gifts, gratuities and preferential treatment

Each employee must always ask themselves whether a gift, favour or invitation, received or offered, is intended to exert influence on the person receiving it by the person offering it. Since the value of gifts does not automatically imply the existence of a conflict of interest or an act of bribery, each employee is obliged to provide the management with evidence of transparency and vigilance regarding the motive and legitimacy of the offer. In case of doubt, it is important to discuss the procedure to be followed with the management.

Interpersonal relations

Close personal relationships with other colleagues in the workplace may lead to the appearance of favouritism or improprieties, especially if one colleague is in a position to control, influence or affect the hiring of another. In the conduct of any activity, situations must be avoided where the persons involved in the transactions are, or may even appear to be, in conflict of interest. It is their obligation to avoid all situations and activities in which a conflict of interest may arise between personal economic activities and the duties held in the Company or the interests of the Company itself. If, however, situations of conflict or situations of potential conflict should arise on an occasional basis, the utmost communication and transparency is required towards the manager or the representative responsible for any appropriate measures.

3.3. THE RELATIONSHIP WITH SUPPLIERS.

Respect in business activities

At Giorgio Bormac, we strive for quality products and services in procurement and a lasting partnership, and to this end we grant every supplier equal business opportunities by ensuring honest and impartial judgement.

Prohibition of corruption

Similarly, we at Giorgio Bormac do not accept any pressure aimed at favouring one supplier over another that could undermine transparency and credibility in the application of the law and internal procedures. In relations with suppliers, we prohibit promises, direct and indirect benefits and acts of courtesy that could be aimed at obtaining favourable treatment. Any gifts received from suppliers shall be shared with internal collaborators or used indirectly through 'company raffles'.

Protection of information in our possession

We ask our suppliers, consultants or third parties who come into contact with Giorgio Bormac not to disclose confidential information belonging to our company of which they may become aware in the course of their work. Likewise, Giorgio Bormac is committed to respect and ensure the confidentiality of the individual information of our employees, our suppliers and those who have provided information necessary for the performance of activities related to us, making use of such information limited to the purpose for which it was collected, in accordance with applicable national regulations. Giorgio Bormac undertakes to promptly inform its suppliers if, where required by law or authorised by contractual agreement, it finds itself in the situation of having to disclose confidential information.

Selection of Suppliers

We select our suppliers based on an assessment of the technical and professional suitability of the goods and services, their quality and cost-effectiveness, and respect for society and the environment in which they operate.

Social responsibility of suppliers

We demand that our suppliers pay the utmost attention to the protection of their workers, in particular regarding child labour, respect for human rights, health and safety and the environment.

3.4. THE RELATIONSHIP WITH THE PUBLIC ADMINISTRATION

All Giorgio Bormac's collaborators are asked to relate with the Public Administration with the utmost fairness and integrity of conduct, expressly prohibiting conduct aimed at influencing the Public Administration's decisions in order to obtain favourable treatment.

It is likewise prohibited to comply with requests from Public Administration personnel aimed at granting Giorgio Bormac favourable treatment or, in general, recognition of any kind such as: offers of money, goods, access to confidential information, proposals of employment opportunities.

3.5. THE RELATIONSHIP WITH THE COMMUNITY AND THE TERRITORY

At Giorgio Bormac, we are keen to establish relationships and collaborative relations with institutions, authorities and associations that are an expression of civil society in the area aimed at lasting in an atmosphere of mutual benefit.

COMPLIANCE

WITH THE

CODE

OF

CONDUCT



4.1. DISCLOSURE



The principles presented in this Code must be respected and put into practice by all our partners in their daily activities with other partners or external stakeholders.

4.2. REPORTS



All conduct or requests that go against the ethical principles expressed in this Code should be duly reported by the recipients so that they can be examined in detail in order to take appropriate action.

We ensure that each person can be put in the best position to communicate such information to an appropriate extent without breaking the law or confidentiality obligations, by filling in the dedicated form or via the specific address indicated in this Code of Conduct.

4.3. VIOLATIONS AND PENALTIES



Violations of the rules contained in this Code will be considered on a par with a breach of the obligations arising from the employment relationship or a disciplinary offence, which will be followed up with appropriate measures. We undertake to provide for and subject, according to principles of impartiality and uniformity, sanctions proportionate to the respective breaches of the Code, in accordance with the provisions in force concerning the regulation of labour relations.