



Bertoli Antonio

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Azienda Certificata-Certified Company ISO 9001-2015

CODE OF ETHICS

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1. INTRODUCTION

Bertoli Antonio Srl was established in 1960 in Castelli Calepio - in North of Italy - as a manufacturer of garment accessories and made itself known on the Italian and international market.

Later in addition to the fashion industry, the Company successfully enters other sectors, also becoming well known for the production of gadgets and promotional items as well as for products related to packaging, perfumery and wine and spirits sector.

Nowadays Bertoli Antonio Srl designs and manufactures articles in metal, plastic and ecological materials, directly managing the complete production and making its know-how available to meet the most different needs of customers.

The choice to produce everything inside the Company has been taken to guarantee 100% Made in Italy and above all to support Made in Italy within of a glocal strategy (Think global, Act local). Embracing the ideals transmitted by the company's founder, Mr. Antonio Bertoli, the second and third generation of the family - together with the entire corporate team - apply and respect the values and principles expressed in this Code of Ethics.

2. RECIPIENTS

The Recipients of the Code of Ethics are all Company Representatives, without any exception, and all those who, directly or indirectly, permanently or temporarily, establish relationships with Bertoli Antonio Srl and work to pursue their objectives.

Each Board member, director, external collaborator, consultant, supplier, customer bears responsibility to comply with the Code and related guidelines and policies.

In carrying out the corporate mission, the behavior of all Recipients of the Code of Ethics must be inspired by the ethics of responsibility.

3. GENERAL PRINCIPLES

The general principles of the Code of Ethics reflect Bertoli Antonio srl's values and guide the relationship with the Recipients on a daily basis.

Bertoli Antonio Srl has as essential principles:

- compliance with national and international regulations as a binding and indispensable condition for one's actions. It therefore undertakes, even with careful prevention of offenses, to comply with these regulations as well as general recognized practices.
- respect and value of people. Bertoli Antonio Srl protects the value of the human person, promotes diversity and integration, paying attention to all aspects inherent in people's lives.
- honesty and transparency. Relations with Recipients, at all levels, must be based on criteria and conduct of correctness, consistency, loyalty and mutual respect.
- research and innovation. The Company is based on a passion for the product, for research and creation, through innovative production processes, to generate items of ever higher quality, which are perceived as distinctive.

4. CODE OF CONDUCT AND GENERAL RULES

Compliance with the rules of the Code of Ethics must be considered an essential part of the contractual obligations of the Recipients, pursuant to and for the purposes of art. 2104 and 2105 of the Civil Code.

Therefore, the violation of these rules may constitute a breach of the primary obligations of the employment relationship or a disciplinary offense, with all legal consequences.

All Recipients of this Code of Ethics must maintain a position of integrity and impartiality, avoiding that decisions or activities are taken in situations, even if only potential or apparent, of conflict of interest.

Any activity that conflicts with the correct fulfillment of one's duties or that could harm the interests and image of Bertoli Antonio Srl must be avoided.

Bertoli Antonio Srl will not initiate or continue any relationship with anyone who does not intend to comply with the principles of the Code of Ethics. In no case behavior not in line with the Code of Ethics is justified

5. RELATIONSHIPS TOWARDS CUSTOMERS

The Company considers its corporate reputation as a fundamental asset for customer relations.

The behavior of all employees, managers, collaborators and external consultants towards customers conforms to the principles of transparency, reliability, responsibility and quality.

Each Recipient according to his role and respecting the internal procedures must observe the provisions contained in this Code of Ethics, to encourage the success of the relationship with the customer and honoring all commitments made.

6. RELATIONSHIPS TOWARDS WORKERS

The skills and professionalism of the company's collaborators and employees represent the primary value of the Bertoli Antonio Srl company.

Teamwork based on dedication, commitment and collaboration guarantees a structure that operates in full respect of people and environment.

The entire staff maintains a conduct based on mutual respect for the dignity of each one.

The collaborative spirit among the staff enhances the individual professional growth and allows everyone to acquire new skills and abilities.

This objective is consistently followed by managers and function managers, who consider the individual's aptitudes in the attribution of their task and the assumption of their role.

Bertoli Antonio Srl undertakes to guarantee the suitable working environment in compliance with the laws and regulations in force.

No type of discrimination or exclusion is tolerated, as regards age, culture, ethnicity, nationality, religious belief, political opinion, gender and sexual orientation, identity and / or gender expression, genetic information, health or disability.

7. RELATIONSHIPS TOWARDS SUPPLIERS

Supplier selection is based on free and fair competition and transparent supplier selection criteria, including objective factors such as quality, reliability, delivery and price, without preference for personal reason.

Relations with suppliers are governed by the provisions of the Code of Ethics.

Bertoli Antonio Srl undertakes to share the principles and contents of the Code with its suppliers and external collaborators, promoting the establishment of a lasting business relationship.

The fulfillment of the contractual services will be in line with the principles of correctness and diligence, in full compliance with laws and regulations.

8. SAFETY, ENVIRONMENTAL PROTECTION, SUSTAINABILITY AND RELATIONS WITH THE TERRITORY

Bertoli Antonio Srl promotes and guarantees the health and safety of its employees who in any way access its offices and work environments, adopting all appropriate measures to prevent accidents or damage to health; the Company selects a representative who is responsible for the health and safety of all staff and for the corporate security system update. It also ensures regular and documented training on safety and health.

By spreading the culture of safety and awareness of the risks, the Company promotes responsible behavior in full compliance with laws and current accident prevention regulations.

For this purpose, each Recipient contributes individually by holding responsible behavior in the role in which it operates for its own and others protection.

Bertoli Antonio Srl is constantly committed to improve the environmental performance of its business and products, while paying attention to safety and quality requirements.

- Attention to the energy efficiency of the company and production
- Continuous search for raw materials with reduced environmental impact
- Reduction of waste of water in the production processes
- Careful management of the cycle of waste and recycling

All Recipients are required to conduct their duties in compliance with the Code of Ethics and do not harm the community and the territory.

9. TRANSPARENCY AND INTEGRITY

The Recipients, in carrying out their duties, must be inspired by maximum transparency and correctness. Each transaction is correctly recorded in the company accounting system according to the envisaged regulations and applicable accounting principles.

Accounting transparency is based on the truth and reliability of management events and related accounting records. Each registration reflects exactly what results from the supporting documentation.

10. PERSONAL DATA'S PROTECTION

The Company guarantees that the data acquired, stored and processed are used within the limits established by company procedures, in compliance with related laws and regulation for security and privacy.

All information cannot be used, communicated or disclosed by the Recipients, who will have to acquire and process only the necessary data connected to their work tasks.

These data will be stored in a way that prevents third parties from access.

11. PREVENTION OF CORRUPTION AND MONEY LAUNDERING

Bertoli Antonio Srl does not tolerate any form of payment that is not strictly deriving from a business relationship governed by contract or negotiation obligation.

The Company expects that its business partners also share this principle.

Bertoli Antonio Srl rejects any conduct designed to employ, replace or transfer money whose origin is suspect or illegal.

The Recipients undertake to contrast events related to money laundering or receiving stolen goods or other utilities of illegal origin.

12. APPROVAL AND AMENDMENT OF THE CODE OF ETHICS

The Code of Ethics of Bertoli Antonio Srl is approved by the Company's Board and can be modified exclusively by said Board.