



HISTORY OF MODIFICATIONS MADE TO THE DOCUMENT			
Review	Date	Paragraph	Description
0	02/03/2009	ALL	
1	14/03/2017	LAST	Dissemination of the code of ethics
2	17/04/2019	LAST	Dissemination of the code of Ethics to suppliers
3	16/10/2023	last	Addition of the email address for reporting

**General principles**

Below are listed principles and values considered fundamental, shared and recognized by the Company so as its mission may support the good functioning, the reliability and the reputation of the firm.

**Law compliance**

Di Vita S.p.A. complies with all the labor regulations in force in the territory where it carries out its own activity, as well as the regulations and corporate procedures, applying them with commitment and rectitude. The person responsible for the compliance with this Code of Ethics is the Eng. Guido Pochettino.

**Honesty, fairness and ethical behavior**

The company relationships with all the parties involved (workers, suppliers, etc.) are based on the principles of correctness, collaboration and mutual loyalty. Administrators, executives, staff and cooperators carry out their actions in the interest of the company.

The staff of Di Vita S.p.A. company are selected by the Human Resources Mgr. according to the work needs of the company and any potential worker may decide whether to accept or not the job position. Each worker signs a regular contract and earns a proper wage for the work that he/she carries out. The working hours are regularly paid and the extra hours are worked according to legal requirements. Holidays are regularly assigned according to the current legislation. All the staff benefit from sick leave and female workers benefit from maternity leave.

In the workplace, harassment is forbidden, no matter what people's difference it refers to (gender, race, religious belief or other). Any type of harassment shall be reported to the supervisors and all harassment complaints will be object of investigation and actions will be taken in case the harassment is proved to be founded.

**Equal opportunities**

Di Vita S.p.A. is a company that offers equal opportunities: discrimination regarding race, skin color, gender, political thinking, religious creed, civic creed, sexual orientation or condition of invalidity or any other category defended by law is not tolerated. This policy is adopted for all the aspects of employment, including hiring and career advancement or dismissal. Therefore, the freedom of association and the membership in any type of trade union is protected. Each worker is offered the same opportunities as everyone else, there is no discrimination, and the merit is the only parameter taken into account for the purposes of a career advancement.

**FAIRNESS OF COMMERCIAL PRACTICES**

Di Vita S.p.A. requires its staff to keep the information confidential, regardless they deal with budgetary aspects, sales or production; in addition, Di Vita S.p.A. requires that the information obtained during work is not used for personal gain in order to obtain an unlawful benefit or used according to methods contrary to the law or in a way as to cause damage to the company they work for. Even after the termination of the employment relationship, staff are forbidden from disseminating any data that may cause damage to the company itself.

The innovations and the ideas concerning research, products and production processes or softwares used are owned by Di Vita S.p.A. and they shall never be disseminated outside the company but always treated as confidential information.

Confidential information includes, by way of example and without limitation, trade and financial secrets, corporate know-how, inventions, marketing programs, information about customers and suppliers, purchase and sale prices and, in general, all that information that is not made public and that, if unduly used or made public, may bring profits to third parties and cause damage to Di Vita S.p.A.

**Disciplinary measures**

In the event of non-compliance with one of the internal regulations of Di Vita S.p.A., the person responsible for the act will be initially given a verbal warning by the Human Resources Mgr. or by the Director General, and then he/she will receive a written warning and, if necessary, in case the behavior does not conform to the rules, the company will issue a letter of dismissal.

**Dissemination of the Code of Ethics**

The Code of Ethics will be posted on the bulletin board so as all the staff can read it and follow the rules described in it and it will be also included on the virtual bulletin board. Moreover, this code will be sent to the suppliers, that should sign it and return it within a working week. If no answer is received within 7 days, the code will be considered as approved in all its points.

Di Vita S.p.A. informs that the mail address [segnalazioni@divita.it](mailto:segnalazioni@divita.it) is available and it shall be used by our staff, suppliers and customers to give us feedback as regards any shortcomings or aspects of our behavior that we may improve or of the behavior of people and companies that work with us. The e-mails will be only read by the Board of Statutory Auditors.