



## ETHICAL POLICY I32

HISTORY OF MODIFICATIONS MADE TO THE DOCUMENT			
Audit	Date	Paragraph	Description
0	March 2nd, 2009	ALL	
1	March 14th, 2017	LAST	Distribution of ethical code

### General Principles

Here below are indicated the principles and the values regarded as fundamental, shared and recognized by the Company to ensure that its own mission favor the proper functioning, the reliability and the reputation of the company.

#### Legality

Di Vita S.p.A company complies with all the regulations in force as regards labor standards in the territory where it carries out its activity, as well as with the corporate regulations and procedures, applying them with commitment and rightness.

#### Honesty, fairness and ethical behavior

The relationships of the company with all the subjects involved (workers, suppliers, etc...) are based on the criteria of correctness, cooperation and mutual loyalty. The administrators, the managers, the staff members and the cooperators carry out their own task in the interest of the company.

Di Vita S.p.A. workers are selected by the Human Resource Managers according to the occupational necessities of the company and each worker can decide whether or not accept the position. Each worker has a regular contract and receives an adequate salary for the task he/she carries out.

The hours worked are regularly paid and the overtime work complies with law regulations. Holidays are regularly permitted according to the legislation in force. All the workers benefit from sick-leave and women workers benefit, in case of maternity, of the necessary maternity leave.

At the work place, harassments are forbidden, indifferently whether they are based on any of the differences among people (gender, race, religious creed or other). Any kind of harassment shall be reported to the supervisors and all the harassments shall be object of examination and necessary actions shall be taken in case these harassments are proved to founded.

#### Equal opportunities

Di Vita S.p.A. company is a hirer that guarantees equal opportunities: no discriminations based on race, color of the skin, gender, political thinking, religious creed, civil creed, sexual orientation or invalidity condition or any other category protected by the law are tolerated.

This policy is followed for all the occupational aspects, including the hiring and the career advancement or dismissal.



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Therefore, the freedom of association and the adherence to any kind of trade union is protected. Each worker has the same possibilities as everyone else, there are no discriminations, and the merit is the only parameter taken into consideration for a career advancement.

### **CORRECTNESS OF THE COMMERCIAL PRACTICES**

Di Vita S.p.A. company imposes on its workers, whether they deal with financial matters, sales or production, the confidentiality of the information and requires that all the information obtained at the work place is not used for one own's interests for gaining unduly benefit nor according to methods against the law or in a way as such to damage the Company which the staff members work for.

The innovations and the ideas that concern the research, the products and the production processes or the software used are owned by Di Vita S.p.A. and they shall never be communicated to those outside but shall be always handled as confidential information.

As confidential information we can mention, for illustrative yet incomplete purposes, the commercial and financial secrets, the corporate know-how, the inventions, marketing programs, the information about customers and suppliers, the prices of purchase and sale and in general all that information that has not been made public and that, if used or unduly made public, may bring profits to third parties and damages to Di Vita S.p.A.

### **Disciplinary measures**

In case of failure to comply with one of the internal rules of Di Vita S.p.A. company, the responsible person for the action shall be first rebuked orally by the Human Resource Manager or by the General Manager, then reprimanded in writing and, if necessary, that is, if the behaviour does not comply with the regulations, a dismissal notice shall be provided for.

### **Dissemination of the ethical code**

The ethical code shall be put on the message board so that all the workers can have access to it and follow the rules here described. In any case, the ethical code shall be also included in the pay envelope so that all the staff members have a copy for any eventualities.