

**DUE GI Srl di  
CATTANI  
GIUSEPPE & C.**

# **CODE OF ETHICS**



**DUEGI** srl

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## 1. INTRODUCTION

DUE GI S.R.L., founded in 1990 by Dr. CATTANI GIUSEPPE, is the exclusive dealer for Emilia Romagna of INGERSOLL RAND ITALIANA, a world leader in the field of compressed air production and treatment.

DUE GI operates mainly in the sector of design, manufacturing, installation and maintenance of compressed air systems and nitrogen generators; it also deals with sales and assistance with original spare parts and the rental of air compressors, accessories and systems for the treatment and distribution of compressed air.

The main condition for the success of the company, for the promotion of its image and the achievement of levels of excellence, is ethics in conducting business, a primary and necessary value for the Company.

For this reason, DUE GI has adopted this Corporate Code of Ethics which, in line with the principles of conduct of loyalty and honesty already shared by the company, is aimed at regulating, through behavioral rules, the company's activity, establishing the general principles to which it must conform, also with a view to increasingly effective work organization.

## 2. MISSION AND VISION

In a market that changes very quickly and rewards only those who know how to adapt and offer “Taylor made” products and services, DUE GI is committed to adapting its services and its structure to the changes required by Customers and the socio-economic context on a daily basis, ensuring flexibility and speed in responding to the needs expressed, aware of the need to consolidate a corporate culture based on values such as honesty and respect for the rules, managing knowledge and promoting staff training and education programs at all levels.

We are constantly committed to acting with professionalism, avoiding conflicts of interest, never tolerating corruption, respecting trust and integrity.

## 3. VALUES

### Honesty and Clarity

The fundamental principle for all activities, products and communications of DUE GI is honesty. Relationships with stakeholders, at all levels, must be based on criteria and behaviors inspired by loyalty, mutual respect, correctness and coherence.

### The person at the center

DUE GI is committed to supporting the value of the person, through respect for physical, cultural and moral integrity and respect for relationships between individuals. DUE GI supports and respects human rights in every area of its activity and sphere of influence.

### Job protection

DUE GI does not use forced or compulsory labor or child labor and rejects any discrimination based on age, sex, health status, nationality, political opinions and religious beliefs; it also repudiates any form of discrimination in hiring policies and in the management of human resources. Any form of mobbing and exploitation of labor, direct and/or indirect, must be prevented and recognition of merit in work performance must be guaranteed.

### Environmental Protection

DUE GI is committed to respecting the environment as a primary asset. To this end, its choices are aimed at ensuring compatibility between economic initiative and environmental needs, taking into account technological development and the best experiences in the field.

### Compliance with the laws

Employees and collaborators of DUE GI in various capacities, in carrying out their professional activity, are bound to comply with the laws in force, this Code of Ethics, internal procedures and professional ethics. The achievement of the company's interest must never legitimize conduct that violates these rules.

## **4. VALIDITY AND APPLICATION OF THE CODE OF ETHICS**

This Code of Ethics is addressed to all employees, external collaborators (consultants, agents, intermediaries, partners, etc.), Suppliers, Customers and all other subjects who, in various capacities, have relationships with DUE GI or act in its name and on its behalf (hereinafter referred to as Recipients).

DUE GI expects all Recipients to conduct themselves in compliance with the principles expressed in this Code, without prejudice to respect for cultural and social specificities.

Recipients are required to know the rules and to refrain from conduct contrary to them, collaborate with the structures responsible for verifying violations and not conceal the existence of this Code of Ethics from the counterparties.

All employees are required to comply with the rules of the Code of Ethics as an essential part of the contractual obligations pursuant to Article 2104 of the Italian Civil Code.

The Code of Ethics is valid both in Italy and abroad, while taking into account the different cultural, political, social, economic and commercial realities of the various countries in which DUE GI operates.

## **5. PRINCIPLES**

For DUE GI, the Principles are a bridge between our Values and our daily actions, as they outline the "how" we exercise our values.

At all levels, internally and externally, our behavior must be based on compliance with the principles of correctness, legality, impartiality, transparency, confidentiality and mutual respect.

### Correctness and legality

DUE GI carries out all its activities in compliance with the laws, professional ethics and internal procedures.

Loyalty and integrity must guide all activities, internal and external, operating with a sense of responsibility, in good faith, establishing correct professional and commercial relationships, as well as aiming to enhance and safeguard the company's assets.

This commitment is also understood to be assumed by consultants, suppliers, customers and anyone who has relationships with DUE GI.

### Impartiality

In relations with employees and all third parties, the Company avoids any discrimination based on age, nationality, religious belief, political and union affiliation, language, sex or health status.

### Relationships with Third Parties

It is essential to verify in advance all available information on commercial counterparties, suppliers, partners and consultants, in order to ascertain the respectability and legitimacy of their activity, before establishing business relationships with these parties.

DUE GI does not enter into business relationships with parties of unproven or suspect moral integrity.

### Protection of company assets

All employees, external collaborators (consultants, agents, intermediaries, partners, etc.) are responsible for the care and conservation of the assets, physical and intangible, and resources, whether human, material or intangible, entrusted to them to carry out their activities, as well as for using them in a proper manner and in accordance with the company interest and compliance with national and international regulations.

None of the assets and resources owned by the Company must be used for purposes other than those indicated by DUE GI. Each collaborator is required to operate diligently to protect company assets, through responsible behavior and in line with the operating procedures established to regulate their use.

All employees and external collaborators (consultants, agents, intermediaries, partners, etc.) are required to implement the provisions of the company policies on information security (Internet and e-mail use regulations) to ensure their integrity.

With regard to IT applications, each collaborator is required to scrupulously adopt the provisions of the "Internet and e-mail use regulations", in order not to compromise the functionality and protection of the IT systems.

### Confidentiality

DUE GI guarantees, by applying the provisions of the DUEGI TREATMENT REGISTER and in compliance with the provisions of the law, the confidentiality of the information in its possession.

All employees and external collaborators (consultants, agents, intermediaries, partners, etc.) must not use confidential information for purposes not connected to the exercise of their professional activity.

## **6. EMPLOYEE PROTECTION**

### Professionalism and enhancement of Human Resources

DUE GI firmly believes that human resources are a fundamental factor for its development, and therefore ensures a safe working environment that facilitates the completion of work and enhances the professional skills of each individual.

DUE GI is committed to enhancing the skills of its resources, annually preparing a Training, professional updating and development program.

The involvement and empowerment of people are facilitated by a working environment inspired by respect, fairness and collaboration.

The personality and professionalism of each individual must be protected, guaranteeing their physical and moral integrity; employees must behave in a respectful manner towards the people they come into contact with, treating everyone in a correct and dignified manner.

#### Child labor and immigrants

DUE GI rejects any form of exploitation of workers.

In particular, it rejects the exploitation of child labor, as well as the performance of any activity that may jeopardize or interfere with the education of children, their health and their physical, mental, moral and social development.

DUE GI employs immigrant workers only if they have a regular work permit.

#### Health protection

DUE GI carries out its activities in compliance with current legislation on workplace safety. All Recipients, within the scope of their duties, must base their activities on risk prevention and on the protection of the health and safety of themselves, colleagues and third parties.

Relationships between employees must be based on the principle of civil coexistence and must guarantee mutual respect for the rights and freedoms of individuals.

Relationships between the different levels of responsibility must be conducted with loyalty and correctness.

Function Managers must carry out their duties with objectivity and balance, ensuring the well-being and professional growth of their collaborators.

All employees must provide maximum collaboration towards their managers, diligently observing the provisions received.

## **7. RELATIONSHIP WITH SUPPLIERS**

The choice of suppliers and the definition of purchasing conditions must be made in an objective and transparent manner, taking into account not only the price and the ability to supply and guarantee quality goods and services, but also the honesty and integrity of the supplier.

In the supply of goods and/or services, DUE GI wants to enhance the contribution of its suppliers, whose collaboration makes it possible to carry out the business activity. All purchasing processes must reconcile the search for the maximum competitive advantage and the granting of the same opportunities to each supplier, in a context of mutual loyalty, fairness and impartiality.

DUE GI is committed to promoting, towards suppliers, compliance with environmental and social conditions.

Relations with suppliers follow the principles of integrity and independence and are subject to constant monitoring by DUE GI.

In the procurement phases of goods and services, employees must comply with the internal procedures for the selection and management of suppliers.

In order to adapt the procurement activity to the ethical principles adopted, DUE GI reserves the right to introduce, for particular supplies and if deemed necessary, social requirements.

To this end, contractual clauses may be included in contracts with suppliers that provide for compliance by the supplier with specific social obligations such as, for example, the guarantee of respect for fundamental rights, the principles of equal treatment and non-discrimination, the protection of child labor.

The relationships between DUE GI and financial institutions must be based on fairness and transparency, in order to create value for the company itself. For this reason, financial institutions are selected in relation to their reputation and adherence to values compatible with those expressed in this Code of Ethics.

## 8. GIFTS AND SPONSORS

It is forbidden to give any form of gift, freebie or grant benefits to subjects who have commercial relationships with DUE GI, except in the case in which, also taking into account the countries in which one operates, such forms of gift, freebie or benefit are of modest value and fall within ordinary practices and customs.

It is not permitted to accept freebies, presents and the like, unless directly attributable to normal courtesy relationships and provided they are of modest value.

Employees and collaborators of DUE GI who receive gifts, freebies or benefits are required to notify the Company Management. If the amount of the gifts, freebies or benefits exceeds the modest value as considered in Italy (approximately 50.00 euros), express authorization must be requested from the Company Management, so that the conduct to be followed can be agreed upon.

In relations with Public Officials, it is forbidden to give or promise money or other benefits.

## 9. COMMUNICATION AND TRAINING

DUE GI is committed to communicating clearly, transparently, accurately and promptly with its stakeholders.

DUE GI's communication with its stakeholders is based on respect for the right to information; it is never permitted to disseminate false or biased news.

DUE GI is also committed to disseminating this Code of Ethics, using all available means of communication (company website, specific communications, posters in the workplace, information meetings and staff training).

All Recipients must be able to access the Code of Ethics, know its contents and observe what is prescribed.

In order to ensure the correct understanding of the Code of Ethics, specific training sessions are arranged to promote knowledge and dissemination of the values and principles set out therein.

Every communication activity must comply with the laws, rules, and practices of professional conduct and must be clear and transparent, especially protecting "sensitive" information and industrial secrets.

## 10. CORRUPTION, MONEY LAUNDERING AND TRANSNATIONAL CRIMES

In pursuing its mission, DUE GI undertakes to comply with the legislation on the fight against money laundering and corruption towards public officials or private individuals both nationally and internationally and against illegal immigration. DUE GI condemns any conduct carried out by individuals who hold a senior or subordinate role, which may even indirectly facilitate the commission of criminal offences such as criminal association or mafia-type association and similar crimes. DUE GI also undertakes to control any form of internal association, in order to eliminate the risk of the occurrence of internal associative phenomena, aimed at engaging in illicit behaviour.

## 11. VIOLATION OF THE CODE OF ETHICS

Violation of this Code of Ethics undermines the relationship of trust established between DUE GI and the perpetrators of the violation, whether they are directors, employees, consultants, collaborators, customers or suppliers and may give rise to disciplinary, legal or criminal action. In cases of significant severity, the violation may lead to the termination of the employment contract (as provided for by the applicable CCNL) if committed by the employee, or to the interruption of the relationship, if committed by another person.

Anyone who becomes aware of a violation of this Code of Ethics or of a specific law must promptly inform their Function Manager and/or the Company Management.

The report must be in writing and not anonymous. DUE GI undertakes to protect whistleblowers from any type of retaliation. Therefore, without prejudice to legal obligations, the confidentiality of the identity of the whistleblower is ensured.

The provisions of this code are an integral part of the contractual obligations assumed by the staff, as well as by the persons having business relations with the company.

Compliance with the provisions of this Code of Ethics must be considered an integral part of the contractual obligations undertaken by employees (pursuant to art. 2104 of the Civil Code). It must also be considered an essential part of the contractual obligations undertaken by non-subordinate collaborators and/or subjects having business relations with DUE GI.





**DUEGI** srl

**DUE GI Srl di CATTANI GIUSEPPE & C.**  
Corso Italia, 570 loc. Mirabello - 44047 Terre del Reno (FE) - ITALY  
Phone +39.0532.847812 - Fax +39.0532358035  
[www.duegisrl.it](http://www.duegisrl.it) / [info@duegisrl.it](mailto:info@duegisrl.it) / [duegisrl@arubapec.it](mailto:duegisrl@arubapec.it)  
C.F./P.I 01171530387 - Cap. soc. i.v.€ 100.000