



Code of Ethics



Code of Ethics

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Code of Ethics

The Code of Ethics is approved by the Cassioli Board of Directors and applies to both Cassioli and its foreign offices, and globally to all its employees, partners and collaborators.

Introduction

Cassioli is a highly specialized company that operates, both nationally and internationally, for the design and supply of automatic systems for automation and corporate intralogistics.

Precisely due to the nature of the Company and the type of products and services offered, Cassioli is found to operate in various parts of the world and to interface with numerous and different subjects.

This Code of Ethics is intended to define, clarify and share the values and rules of conduct that the Company and all its stakeholders must adopt as a model, in relation to the achievement of their objectives.

These values and principles are fundamental for Cassioli's proper functioning and reliability, as well as for compliance with the law and regulations in force, which help to determine the image and reputation of the Company itself.

GUIDING VALUES, PURPOSE AND RECIPIENTS OF THE CODE

To this end, Cassioli undertakes to ensure that all stakeholders, i.e. all the subjects who will enter into relations with the Company, whether they are managers, employees, suppliers and all other interested parties, and that every action and activity carried out by Cassioli is performed in full compliance with the law, considering honesty, integrity, correctness and fair competition as firm and indispensable principles, without forgetting respect for the legitimate interests of employees, shareholders, customers and partners.

The Code of Ethics applies to members of the Board of Directors, managers and employees of Cassioli, as well as to collaborators, professional service providers, agents, commercial intermediaries and, more generally, to all persons and companies acting in their name and on behalf of Cassioli, anywhere in the world. Cassioli is committed to making the Code known and considered a "best practice" and also respected by those with whom it has long-term working and business relationships, such as suppliers, dealers, consultants and agents.

Cassioli guarantees the maximum dissemination of this Code of Ethics, as well as the transmission of any subsequent amendments or additions through paper and / or electronic communications.

Cassioli shares, and its Code of Ethics incorporates, the principles of the "Universal Declaration of Human Rights" of the United Nations ("UN"), the Conventions of the International Labor Organization ("ILO") and the Guidelines of the Organization for Economic Cooperation and Development ("OECD") for multinational companies.

This Code of Ethics is not and does not want to be exhaustive. Therefore, unforeseen events will be resolved according to best management and corporate governance criteria.

Anyone who works on behalf of Cassioli must respect this Code. Within the limits of local legislation, all members of Cassioli must be aware that with their behavior they represent the Company, even outside working hours, if they act or can be understood that they act on behalf of Cassioli. The behavior and actions of each of them are in fact reflected both on the external reputation of the Company and on its internal culture.

Over the years, Cassioli has defined the values that lead its work and that direct the strategies and projects of every day, aimed not only at the success of the Company, but also at customer satisfaction and the generation of economic value for shareholders and to enhance social development.

***“Non-violence leads to the highest ethics,
which is the goal of all evolution.
Until we stop harming all other living beings,
we are still savages.”***

(Thomas Edison)

Mission and Vision of Cassioli

► MISSION

To design and build automated systems for intralogistics and for the handling of goods and products, in order to best meet the needs of all the companies and the most diverse product sectors which require our products and services.

To achieve this goal, Cassioli makes use of a network of internal and external subjects capable of guaranteeing high quality skills and abilities, in order to create competitive solutions.

Cassioli believes in the importance of research and continuous innovation: we create high quality products, that can work in synergy with each other and integrated and efficient systems, with attention to every detail. Thanks to the completely internal know-how and to a personalized service, we supply complete installations of electronic control systems for the management of the different segments: from the handling of materials, the storage of raw materials / semi-finished / finished products, the handling of materials and objects in production processes, up to the preparation of orders and shipments. Everything with highly performing tailor-made solutions.

► VISION

Every day we strive to provide innovative and cutting-edge solutions capable of optimizing the resources of each company, significantly reducing processing times, increasing productivity and thus improving people's work and lives.

Principles of the Code of Ethics

► PEOPLE

HUMAN RIGHTS

Cassioli is committed to ensuring a fair, non-discriminatory, safe and productive work environment for all members of the company, an environment in which everyone is evaluated according to their personal contribution. This is crucial to our success.

Respect for human dignity, social inclusion, protection of the diversity of culture and opinions

Cassioli recognizes that human rights are the set of prerogatives based on human dignity and their effective realization of which is essential for the integral development of every person.

It is for this reason that Cassioli, in every action, undertakes to:

- have a fair, respectful, diligent and honest conduct;
- respect people's dignity, their freedom and their privacy;
- absolutely prohibit and in any form, verbal, physical or visual conduct that violates the dignity and respect of every single person;
- promote and preserve a work environment in which any type of harassment, violence or any other activity that violates the dignity and respect of our employees is condemned, prohibited and punished;
- promote inclusion, so that the diversity of our employees can add value in an environment of equal rights and duties;
- not to discriminate against people by making any distinction, exclusion, restriction or preference that is not objective, rational or proportional and has the purpose or result of hindering, limiting, preventing, undermining or nullifying the recognition, enjoyment or exercise of human rights and freedom, for any reason, including origin, race, marital status, age, opinion, gender, creed, tribe, membership or trade union membership, ethnicity, social or economic class, pregnancy, gender identity, sexual orientation, health, disability or nationality.

FUNDAMENTAL PRINCIPLES AND RIGHTS AT WORK

At Cassioli we are committed to growing as a high-performance company, a place where talent, culture and leadership are the main drivers of development of our people and the achievement of our strategic objectives.

Value of people, forced labor and child labor

We therefore seek to promote the professional development of our employees and provide them with the necessary training and resources to promote both their safety and success at work.

- We value, respect and protect the people who work for Cassioli.
- We do not allow forced labor, we support the radical elimination of child labor and we respect the laws in force regarding the employment of minors.
- We report cases where we cannot objectively fulfill our responsibilities, due to pressure from third parties using their position, authority or influence in Cassioli.

Health and safety in the workplace

Cassioli believes that the physical integrity, health and safety at work of our employees are as important as any other function and objective of the Company.

Cassioli takes the necessary actions to ensure the achievement of the following health and safety objectives in the workplace:

- Provide and maintain safe and healthy workplaces.
- Provide and maintain an adequate work environment.
- Develop a safety culture among staff.

► ENVIRONMENT

COMMITMENT WITH THE COMMUNITY

We recognize our commitment to contribute to the protection and development of the community through our business management, which is an example of the principles and values we have practiced since our origin.

- Cassioli establishes strategic alliances with civil society organizations and other subjects, whose goal is to improve the social impact of our community actions.
- Cassioli participates in community and public affairs, which allow us to have an impact on the human and economic development of the communities in which we operate.

RESPECT FOR THE PLANET

We know, address and mitigate the risks associated with the environmental impact of energy, water and waste management throughout the value chain of all our operations.

- Cassioli is committed to protecting and preserving the environment as part of its social commitment.
- Cassioli encourages the development and diffusion of environmentally friendly technologies in all its actions and operations.
- Cassioli takes all necessary actions to ensure that within the company and all its offices:
 - Effective emergency response procedures are implemented to minimize the impact of unpredictable environmental incidents.
 - Significant changes in business units and processes are evaluated in advance to prevent negative impacts on the environment.
 - Discharges and emissions into the air are reduced and that these don't have a negative environmental impact.
 - The use of clean energy sources is promoted, energy is used efficiently and its consumption monitored.
 - The necessary measures are taken to prevent environmental accidents that may be caused by our operations.
 - Promote the efficient use of water, as well as activities that promote its care and conservation.
 - Operational growth is guaranteed to reduce the impact on the environment, by implementing programs for the reduction, reuse and recycling of waste from our activities, as well as waste related to our products and services offered.

► RESOURCES AND INFORMATION

USE OF THE CASSIOLI ASSETS

Each employee, manager or member of Cassioli has the responsibility to protect and to use the Company's assets correctly, as well as to work hard to make the most of all the resources assigned.

- We protect and preserve the assets of Cassioli and those we use on behalf of Cassioli.
- We use Cassioli's resources efficiently to help achieve its goals.
- We use Cassioli's name or resources responsibly, always and exclusively seeking the benefit of the Company.

INFORMATION MANAGEMENT

We generate, obtain, treat, protect and store information as the Company's assets, with responsibility, ethics and in compliance with the laws applicable in each country in which we operate and with the systems authorized by our administration.

Privileged and confidential information

- We do not disclose information and we prevent the leakage of privileged and confidential information to unauthorized persons, in compliance with the provisions of the laws governing the markets in Cassioli.
- Those of us who carry out activities as professors, exhibitors or students use Cassioli's public information only for carrying out our business.
- We do not make any comments, even on family media or social networks, on the activities we carry out within Cassioli, which are harmful to the Company or to those who are part of it.
- The official spokespersons of Cassioli are the only persons authorized to provide information about the company to the media.

Accounting and financial records

- We record accounting and financial information in an accurate, complete, correct and timely manner in accordance with the accounting regulations in force, as established by applicable laws and by the regulatory authorities of the securities, guaranteeing the truthfulness of the indicators of our responsibility.

Intellectual property

- Employees, managers and every member of the Company undertake not to disclose any type of confidential information, including that relating to industrial and intellectual secrets, processes, methods, strategies, plans, projects, technical data, market or any other type.

We undertake to maintain the confidentiality of such information even when the employment relationship with Cassioli has ended, as well as of the confidential information of the Companies in which we have previously worked on behalf of Cassioli.

Personal information

- Cassioli obtains and processes the personal data of its members, its customers and all its stakeholders in a responsible, ethical manner and in compliance with the laws applicable in each country in which it operates.

Cyber security

- Employees, managers and every member of the Company are aware of the responsibility shared by all, in the protection and conservation of information security that is managed through Cassioli's technological resources.
- Everyone responsibly uses and protects logins and passwords assigned to technological resources.

► RELATIONSHIP WITH THIRD PARTIES

CUSTOMERS

At Cassioli we try every day to improve the value proposition and experience of our customers.

- We offer our customers fair and honest deal in every transaction, adhering to the principles and values of Cassioli, providing products and services with the highest quality and timeliness.
- We do not make false comparisons with equivalent products and / or services offered by competitors.
- We understand our customers' needs and we are committed to innovating our products and services to meet them.
- We share our Code of Ethics throughout our value chain.

SUPPLIERS

We contribute to the improvement of the work, social and environmental performance of our suppliers and we strive to ensure that they also operate on the basis of responsible corporate policies, principles and practices.

- We include in our customer portfolio only those who share our ethics and values, in accordance with this Code of Ethics.
- The members of the Company who negotiate the acquisition of goods and services requested by Cassioli, offer and require professional treatment from suppliers in every transaction, always looking for the best interest of the Company.
- Cassioli guarantees the fair participation of suppliers on the basis of quality, profitability and service criteria.
- Cassioli considers an illegal conduct to request or receive incentives of any kind from suppliers for their selection.

COMPETITORS

Cassioli always undertakes to act fairly, on the basis of its ethical principles and in compliance with the competition laws in force in the countries in which it operates.

- Cassioli does not participate in any agreement with customers, suppliers or competitors, which tries to limit the free play of the forces of the markets in which it operates.
- All the members of the Company who have contact with the representatives of the competitors demonstrate a professional attitude, connected with the

principles and values of the company they represent; they also take great care of the personal image and that of Cassioli.

- Interacting with competitors, both individually and in corporate or professional forums and associations, employees, managers and all members of Cassioli do not comment on issues that could generate risks or possible contingencies for Cassioli in terms of compliance with competition laws.

GOVERNMENT AND AUTHORITY

In Cassioli, our Values are the basis of relations with the government and with the authorities of the countries in which we operate, providing openness and respect.

- We comply with the laws, regulations and other applicable regulations established by the governments of the countries in which Cassioli operates.
- We collaborate at all times with the government and with the competent authorities for the full exercise of their powers, and we act in accordance with the law in defense of the legitimate interests of Cassioli.
- We respect the Government and the Authorities, to whom we offer friendly treatment, and we look for an atmosphere of openness and trust that facilitates the discussion of issues and the definition of agreements.
- We welcome the requests and comments of governments and authorities, trying to collaborate effectively and courteously in the fulfillment of their mission, within the powers conferred on them by laws or regulations.
- The relationships we maintain on behalf of Cassioli with government agencies or officials are carried out in compliance with applicable laws and our Code of Ethics.

MARKETING AND COMMUNICATION

Every type of communication carried out by Cassioli through advertising and marketing must be:

- Legal, decent, honest, truthful and compliant with the principles of fair competition and good commercial practice.
- Prepared with a sense of social responsibility and based on principles of honesty and good faith.
- Verifiable and free of elements that could lead to an incorrect interpretation of the characteristics of the products and services offered.
- Respectful of moral values, avoiding unethical circumstances that violate human integrity and dignity or use culturally offensive symbols.

► LEGALITY

REGULATORY COMPLIANCE

In Cassioli, legality is part of our culture: we work every day to ensure that employees, managers and all members of Cassioli practice it. We firmly believe that our world requires organizations and individuals who are truly engaged in society.

- We respect the laws, regulations and ordinances of the countries in which we operate, as well as this Code of Ethics, the policies, rules and procedures established by the Administration of Cassioli.

ANTI-CORRUPTION AND ANTI-MONEY LAUNDERING

We conduct business practices in accordance with the law, honestly and ethically, with no tolerance for bribery, rejecting and fighting acts of corruption.

In the activities inside and outside Cassioli or on its behalf, directly or through third parties, we do not therefore participate in acts of corruption:

- we do not order, authorize or promise the execution of corrupt practices;
- we do not induce anyone to engage in corrupt practices, and we do not conspire to carry them out.

We comply with the anti-corruption laws in force in all the countries in which we operate.

Anti-Corruption

- We reject any kind of bribery of public officials.

Anti-Money Laundering

- We respect the laws in force regarding the prevention of money laundering and we promote their knowledge and respect among our collaborators.
- We develop processes and mechanisms for compliance with current laws on the prevention of money laundering, which help to generate security and trust in the economic sectors of the countries in which we operate.

POLITICAL CONTRIBUTIONS

- All members of Cassioli who participate in political activities of any jurisdiction must not involve the Company, clearly establishing that they are acting in a personal capacity and not on behalf of Cassioli.
- Cassioli complies with the requirements established by local laws on political contributions in the countries in which it operates.

CONFLICT OF INTEREST

In Cassioli we carry out all our activities with integrity and professional ethics, always seeking the benefit of Cassioli and not personal advantages.

Financial interests

- Those who have or intend to have commercial, business or investment relationships in companies or other activities that have or are seeking commercial or business relationships with Cassioli may carry out such commercial, business or investment relationships, only on condition that they have been previously analyzed and approved in accordance with Cassioli's Corporate Policies.
- Cassioli has no interests or investments that allow it to have influence, nor to participate in the commercial activities of competing companies.

Family relationships and others

- Cassioli does not participate in, nor influence, directly or indirectly, the requirements, negotiations, hiring and decision-making processes concerning any customer, supplier and / or business partner, if with any of them:
 - Has a family relationship, or
 - Has a family member who is a partner, investor or representative, or
 - Has a relationship (including friendship) that could generate a conflict with Cassioli's interests or any personal advantage (even if this relationship is with a partner, investor or representative of said customer, supplier or business partner).
- We prevent our family members from working under us, except in cases authorized in accordance with the provisions of our Cassioli Corporate Policies.
- Those of us who carry out surveillance, supervision, auditing or control activities on an area under the responsibility of a family member, inform our superior to be replaced of this responsibility and, in the case of the Cassioli CEO, he must inform the Board of Directors.
- We do not intercede or meet the needs of superiors, subordinates, collaborators, family members or friends, if this can damage Cassioli in any way.

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- We do not receive, give, pay, offer, promise or authorize directly or indirectly - on behalf of Cassioli or in a personal capacity - money, gifts, advantageous conditions, salaries, travel, commissions or anything else of value to obtain any undue advantage or benefit of any nature.
 - We only accept, give or offer gifts of a promotional, occasional and symbolic nature.
 - We do not give or offer gifts to government officials.
 - We provide services only in accordance with the provisions of our company policy and applicable legal provisions.
 - When a customer or supplier invites us, whether it involves a trip out of town or to participate in a sporting event or any other type of entertainment, we must comply with the provisions of this Code of Ethics and Company Policies.

Other activities

- We do not carry out any external activity that could affect our capacity and availability with the obligations we have with Cassioli.

Implementation and supervision of the Code of Ethics

This Cassioli Code of Ethics is brought to the attention of all internal and external subjects of Cassioli through specific communication and training activities.

► SUPERVISORY BODY

MANAGEMENT

The Board of Cassioli, composed of:

- Board of Directors
- TUR (Trade Union Representative)
- RSPP (Responsible for the Service of Prevention and Protection)
- HSE (Workers' Health and Safety Representative)

has the task of approving the content and adjustments of the Cassioli Code of Ethics, as well as its emission.

The Board is also the Supervisory Body responsible for monitoring the application of the Code of Ethics. It also monitors compliance with the Code by the recipients of the same.

VIOLATION OF THE CODE OF ETHICS AND SANCTIONS

In the event that the Code of Ethics is violated in any form, where deemed necessary for the protection of corporate interests, and compatibly with the provisions of the current regulatory framework and employment contracts, Cassioli adopts disciplinary measures against those responsible for the violations, which they can go as far as removal from the Company, in addition to compensation for any damage resulting from the violations themselves.

Violations of the rules of the Code of Ethics by employees constitute a breach of the obligations deriving from the employment relationship, with all contractual and legal consequences, also with reference to the relevance of them as a disciplinary offense.

Violations committed by suppliers and external collaborators will be punishable in accordance with the provisions of the related contractual assignments, except for more significant violations of the law.

We respect the rights of the individuals involved in the reports received and we validate and document all available evidence before issuing any corrective measures.

► ETHICAL COMPLIANCE

TERMS AND REPORTS

At Cassioli, our Values are an essential part of the life and culture of the company, therefore we take seriously any report relating to illegal practices or inappropriate behavior detected in our company.

We maintain the utmost confidentiality on the reports received from the administrators of Cassioli, from its collaborators and from third parties, except when it is mandatory to disclose part or all of the content of the report and / or its corresponding investigation, in accordance with the applicable legislation.

We do not tolerate unfounded and bad faith reports directed at innocent people. To be sure that a person has committed an act or omission that violates the Code of Ethics and Company Policies, we conduct an objective and substantiated investigation that supports the attribution of responsibility to the suspect.

We do not take any type of retaliation against people who report and / or collaborate in good faith, in investigations in which there is an alleged violation of any provision established in the Cassioli Code of Ethics or in Company Policies.

Failure to report any known violation of this Code of Ethics and / or of Cassioli's corporate policies implies being co-responsible and deserving of a corrective measure.

How to report

At Cassioli we promote and facilitate the identification of illegal practices and inappropriate behavior, through open communication and formal mechanisms implemented in accordance with the provisions established in the Cassioli Code of Ethics, and we promptly report violations.

Directors and employees, as well as third parties with whom Cassioli has a relationship in the development of its operations, can report any violation of the Cassioli Code of Ethics. Any violation of Cassioli's Code of Ethics and Company Policies can be reported to the Human Resources area or to the TUR (Trade Union Representative).