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## CODE OF ETHICS

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Rev.	Revision Date	Description
00	January 7 2021	Corporate Policy
01	January 7 2022	Policy review with integration of the Code of Ethics
02	April 16 2023	Further integration pursuant to ISO 30415 Certification

For approval

Romolo Bedin

## 1. PURPOSE AND SCOPE OF APPLICATION

The Code of Ethics of Bedin Galvanica identifies the guiding principles, as well as the fundamental directives of conduct that all collaborators, both internal and external, and, in general, all individuals with whom Bedin Galvanica interacts in the management of its business, must observe and promote within the scope of their respective responsibilities.

Since 2012, the company has implemented an integrated certification system compliant with ISO 9001/2015, ISO 45001, and ISO 14001/2015, which, together with the recent ISO 30415 certification obtained in January 2023, is expressed through a Policy and a Management System that ensure compliance with the principles contained in this document.

This Code of Ethics represents a supplementary document to what has already been established and constitutes an essential component of the integrated management system currently in place within the company.

## 2. INSPIRING PRINCIPLES

The principles on which Bedin is based are the same as those expressed by the United Nations in the Universal Declaration of Human Rights, in the Guiding Principles on Business and Human Rights, and in the 10 Global Compact Principles.

Bedin reaffirms its commitment to pursuing the economic, social, and environmental benefits derived from its corporate activity, contributing—through its decisions—to choices aimed at Sustainable Development.

In particular, the values that have distinguished Bedin for over 50 years are: Respect for employees – Teamwork – Innovation – Professional growth – Competence – Individual responsibility.

### Business Ethics

All individuals to whom this Code applies are required to carry out their activities with the utmost diligence, honesty, cooperation, fairness, loyalty, moral integrity, and professional rigor, in compliance with the laws, procedures, and corporate regulations, and in accordance with the following principles:

1. We are committed to conducting our activities according to a high ethical standard, ensuring integrity, transparency, and compliance with applicable laws.
2. We will not engage in corruption nor allow ourselves to be involved in extortion.
3. We will not tolerate money laundering and/or the financing of terrorism.
4. We will communicate accurately and comprehensively the characteristics of Bedin's coatings.
5. We will respect the principles of commercial confidentiality and the protection of sensitive data.

### Human Rights and Social Performance

1. We believe in fundamental human rights and respect the dignity of every individual, in accordance with the Universal Declaration of Human Rights of the United Nations.
2. We will not tolerate assigning work to individuals under the age of 18.
3. We will not employ any form of forced labor, bonded labor, indentured labor, or prison labor, nor will we restrict the freedom of movement of our collaborators.
4. We are committed to ensuring high standards of health and safety during all activities.
5. We will not obstruct workers' freedom of association.
6. We will not accept any form of discrimination based on race, ethnicity, social class, country of origin, religion, disability, sex, sexual orientation, union membership, political affiliation, marital status, physical appearance, age, or any other restriction not permitted in the workplace, so that any individual who is "fit to work" receives equal opportunity and is not discriminated against on the basis of factors unrelated to their ability to perform the job.

7. Corporal punishment will not be used under any circumstances, and the use of degrading treatment, threats, abuse, coercion, or intimidation of any kind will be prohibited.
8. We will comply with applicable legislation concerning working hours and remuneration.
9. We will support the development of the communities in which we operate, contributing to the economic and social well-being of our local territory and to the value of Made in Italy.
10. We recognize and respect the rights of local populations and the value of their traditions, culture, and social heritage.

### Management Systems

1. We are committed to complying with current laws and, through the integrated management system in place, we will apply every suggestion that may lead to improvement and development.
2. We will assess all types of business risks in order to protect all individuals who collaborate with the company and/or have business relations with it, by adapting our systems and processes to ensure the achievement of ethical, social, environmental principles, and human rights.

## **3. CONDUCT AND BEHAVIOR IN RELATIONS WITH THE PUBLIC AND THE COMMUNITY**

### Clients

The relationship with the client must aim, to the extent possible and in compliance with company procedures, to achieve the highest level of customer satisfaction. Clients must be provided with comprehensive and accurate information about the products and services offered to enable them to make informed choices.

In its relationships with its clients, Bedin generally acts by:

- a. Accurately recording all transactions, excluding cash transactions, and in any case ensuring full traceability of financial movements.
- b. Acquiring and monitoring all information relating to the client, the actual ownership, and the nature of the activities, as permitted by the market and under applicable laws.
- c. Periodically analyzing the risks related to this area with the goal of preventing situations that are inappropriate or not in line with the principles stated above.

### Suppliers

As with the monitoring of Clients, the selection of Suppliers by Bedin is based on choosing the most suitable party capable of providing goods and services of the required quality, always under the condition of adherence to the principles to which Bedin Galvanica is committed, even at the cost of not obtaining the best price.

In accordance with this corporate policy, it is reiterated that relationships with suppliers, just as with Clients described above, follow the same principles; specifically:

- a. Accurately tracking all transactions, excluding cash payments and ensuring full traceability.
- b. Monitoring and acquiring all information regarding the actual ownership and identity of the Suppliers and the nature of their activities, as permitted by the market and by applicable laws.
- c. Periodically analyzing the risks associated with this area with the aim of preventing inappropriate situations or those not aligned with the aforementioned principles.

## **4. HUMAN RESOURCE MANAGEMENT**

The success of Bedin Galvanica Srl depends on the professionalism and diligence of its human resources. The following are therefore fundamental principles of human resource management:

- a. To offer equal employment opportunities in terms of hiring, salary, overtime work, access to training, promotion, termination of employment, or retirement, without discrimination based on race, ethnicity, caste, country of origin, gender, age, sexual orientation, physical or mental disability, religious belief, political affiliation, union membership, marital status, pregnancy, physical appearance, AIDS, or any other applicable basis.
- b. To ensure fair, merit-based, and strictly professional treatment in any decision related to the employment relationship with employees and external collaborators.
- c. To promote and consolidate a culture of workplace safety and to operate in order to protect, especially through preventive measures, the health and safety of workers, both physically and mentally.
- d. To ensure the protection of employee privacy and their right to work without being subjected to unlawful influences.
- e. To respect the right of employees to collective bargaining and to free association. To prohibit child labor.
- f. To ensure that no worker is subjected, in any form, to forced labor, corporal punishment, exhausting tasks, degrading treatment, sexual or physical harassment, psychological, physical or verbal abuse, coercion, intimidation, or threats.
- g. To require its collaborators, each according to their responsibilities, to adopt behaviors consistent with the principles outlined in the preceding points.

Employees are prohibited from pursuing personal interests at the expense of those of the company. The exploitation of the name and reputation of Bedin Galvanica Srl for private purposes is forbidden, as is the personal use of one's position within Bedin and the information acquired during the course of work performance.

The adoption of behaviors that could compromise the company's image is not permitted.

The unnecessary consumption or irrational use of tools and resources is prohibited.

The dissemination to third parties, or the use for private or otherwise improper purposes, of information and news concerning Bedin is forbidden.

The performance of work activities (even on a voluntary basis) that are in conflict or competition with the company is not allowed.

The possession, on paper or electronic media, of pornographic material or images of minors under the age of eighteen on company premises is strictly prohibited.

The termination or conclusion of the employment relationship with the company, regardless of the reason, does not justify the disclosure of confidential information or the expression of opinions that may harm the image and interests of the company.

Employees are required to use the assets made available to them in accordance with their intended purpose and in a manner that preserves their condition and functionality.

### Child Labor

The company does not engage in or support child labor (children under the age of fifteen) and does not employ personnel who have not fulfilled their compulsory education obligations.

If instances of children working (e.g., with suppliers) are observed, the matter must be reported in writing. If the report concerns personnel at Bedin, it must be reported by calling the toll-free number 114 "Emergenza Infanzia."

The company assesses the suitability for the role and the respect of the rights of young workers, including compliance with school-work alternation requirements and the maximum number of hours in which they may be employed (including travel time). The assessment is conducted in collaboration with the labor consultant.

The young worker has the right to request a copy of all documents related to the employment.

As a rule, Bedin does not employ personnel under the age of 18 and, in any case, does not assign them to night shifts or to tasks considered hazardous in terms of health protection.

### Forced Labor

The company does not engage in or support the use of forced labor and does not require personnel to deposit sums of money and/or identification documents or any other form of guarantee with the company, nor does it directly or indirectly withhold commissions or costs related to hiring.

### Health and Safety of Workers

The company's safety policy, also supported by an ISO 45001 certification system, guarantees the protection of workers through the identification of dedicated and properly trained personnel, thorough risk analyses, medical examinations, improvements in working conditions, systematic training and information, the provision of personal protective equipment (PPE), and regular meetings involving all stakeholders.

Periodic safety training is conducted, and PPE is available; if a need arises, it must be reported to the department Supervisor or the Workers' Safety Representative (M.R.).

Bedin is committed to providing employees with a spacious and comfortable "Relaxation Area" where they can take meals. In addition, there are equipped bathrooms, showers, and changing rooms, separate for men and women, maintained in appropriate climate-controlled and always respectable conditions.

### Freedom of Association and Right to Collective Bargaining

The company guarantees the right of all personnel to establish or join trade unions of their own choosing and to engage in collective bargaining.

The company also guarantees the exercise of the right to assemble in the workplace, providing spaces for meetings when necessary.

### Discrimination

Our company does not engage in nor promote any form of discrimination. In full alignment with this principle, BEDIN GALVANICA is ISO 30415 certified.

The company respects the right of personnel to observe religious beliefs or practices, or to meet needs related to race, national, territorial or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political opinions, or age.

Behaviors, materials (e.g., posters), gestures, language, or physical contact of a sexual, threatening, or exploitative nature are strictly prohibited.

If you are the subject or witness of acts of discrimination, threats, or violent behavior, or if you feel disturbed by posters or other materials, the incident must be reported to the Ownership, specifically to Giulio Bevilacqua and Stefania Bedin.

The organization does not subject staff to any medical examination other than those strictly required by the health protocol.

vengono erogati con gradualità, compatibilmente con la gravità della mancanza ed in sinergia con le competenze del consulente del lavoro.

### Disciplinary Practices

The company does not implement or support the use of corporal punishment, mental or physical coercion, or verbal abuse. Any disciplinary measures that may be imposed refer to Italian law and are applied progressively, in accordance with the seriousness of the offense and in coordination with the labor consultant's expertise.

The procedure foresees (in progression): a verbal warning, a written reprimand, a fine not exceeding 3 hours of pay, suspension from work and pay for up to a maximum of 3 days, dismissal for serious misconduct.

If someone is the subject or witness of physical punishment, violence, or disciplinary practices that are contrary to personal dignity and respect, the incident must be reported.

The employee has the right to present their justifications, even verbally, and with the possible support of a trade union representative.

### Working Hours

With regard to working hours, the company applies the provisions of the Metalworking Industry National Collective Labor Agreement. Overtime work is defined as specified by the contract and is always paid at a higher rate than regular pay.

### Remuneration

Bedin guarantees that salaries comply with current legislation and with the provisions set forth by the National Collective Labor Agreement for the Metalworking Industry (CCNL Metalmeccanica Industria) and the individual employment contract.

For any request for clarification or to report issues regarding payslips, employees may contact the Administration Office within a few days of receiving them or after viewing the relevant documents on the company portal.

If, after repeated requests, the clarifications are deemed unsatisfactory or insufficient, the employee has the right to report the matter using the most appropriate channel.

## **5. ADMINISTRATIVE AND ACCOUNTING MANAGEMENT**

The management of company accounting is based on the principles of accuracy, transparency, and completeness. Only truthful entries that reflect the actual nature of the operations performed must be recorded in the accounting books.

Every person working within the company is required to provide maximum cooperation to ensure that business transactions are properly and promptly represented in the company's accounting records.

Each entry in the accounting books must reflect the nature of the operation, representing both its formal and substantive aspects, and must be accompanied by adequate supporting documentation so as to allow for an accurate reconstruction of the transaction.

For every accounting entry that reflects a corporate transaction, adequate supporting documentation must be maintained. This documentation must allow for the identification of the reason behind the transaction and the corresponding authorization.

## **6. ENTRY INTO FORCE, COORDINATION WITH COMPANY PROCEDURES, UPDATES AND MODIFICATIONS**

This Code of Ethics was adopted by the company BEDIN GALVANICA SRL on 01/01/2022 and came into immediate effect. The Code of Ethics supplements the corporate policy and does not replace current or future company procedures, which remain in force as long as they do not conflict with this Code of Ethics.

Recipients are required to comply with the Code of Ethics as an essential part of the obligations arising from their relationship with the company. Any violations will lead to the application of disciplinary measures against the company's employees, in accordance with the applicable legal and contractual provisions.

The Administrator and the Shareholders of the Company, as recipients of this Code of Ethics, acknowledge that compliance with the Code is a PREREQUISITE for the continuation of the existing professional relationship.

Decisions regarding the measures to be taken in response to violations of this Code of Ethics fall under the responsibility of the shareholders of BEDIN GALVANICA SRL.

Any updates, modifications, or additions to this Code of Ethics must be approved by the company's shareholders.

This document supplements the already established company policy (published on the website). Its contents will be reviewed annually to ensure they are up to date and applicable, with a view to the continuous improvement of working conditions, legal and regulatory compliance, and the satisfaction of stakeholders.

Vicenza, 06/04/2023