



CODE OF ETHICS

# Code of Ethics

## Summary

---

<b>1. INTRODUCTION</b>	<b>2</b>
1.1 Purpose and recipients	2
1.2 The value and composition of the Code of Ethics	2
<b>2. GENERAL ETHICAL PRINCIPLES</b>	<b>3</b>
2.1 Attention to human resources	3
2.2 Equality	3
2.3 Responsibility	3
2.4 Transparency	3
2.5 Efficiency and Fairness	4
<b>3. RELATIONS WITH EMPLOYEES</b>	<b>5</b>
3.1 Fundamental rights	5
3.2 Criteria for conduct	5
<b>4. RELATIONSHIP WITH THIRD PARTIES</b>	<b>6</b>
4.1 Relations with customers and suppliers	6
4.2 Relations with the Public Administration	6
<b>5. MANAGEMENT MECHANISMS</b>	<b>7</b>
5.1 Administrative management	7
<b>6. PRIVACY AND PENALTIES</b>	<b>8</b>
6.1 Processing of personal data	8
6.2 Penalties	8

# Introduction

## 1.1 Purpose and recipients

---

Specialcavi Baldassari S.r.l., through this Code of Ethics, aims to identify all those general principles and behavioral rules to which it assigns particular importance due to the positive ethical value they embody.

The Code of Ethics complements the regulatory framework to which Specialcavi Baldassari S.r.l. is subject and is intended to guide the conduct of all employees, directors, consultants, and anyone who establishes any type of collaboration with the company, both in Italy and abroad.

The company also undertakes to make this Code known to all company personnel by posting it on the notice board and publishing it digitally on its app, as well as to all those who have dealings with Specialcavi Baldassari S.r.l. by publishing it on its website.

## 1.2 The value and composition of the Code of Ethics

---

This Code of Ethics is an essential part of the obligations that employees are required to observe throughout the course of their employment. Serious or repeated violations may lead to disciplinary actions, in compliance with the procedures established by law, the National Collective Labour Agreement (CCNL), and Article 7 of Law No. 300/1970 (the so-called “Workers’ Statute”).

The Code of Ethics may also be amended and supplemented to remain aligned with the values upheld by Specialcavi Baldassari S.r.l. It consists of:

- General ethical principles that guide all types of activities;
- Standards of conduct that provide guidelines and rules which the recipients of the Code are required to follow;
- Control mechanisms to ensure proper application of the Code, and implementation methods that enable continuous improvement and updating of the guidelines.

# General ethical principles

## 2.1 Attention to Human Resources

---

Specialcavi Baldassari S.r.l. places particular emphasis on its relationship with Human Resources and, more broadly, with people. Employee well-being is a top priority, with rewards and initiatives aimed at improving their conditions and overall peace of mind.

All company personnel are selected solely based on professionalism, competence, and experience, without any favoritism or discrimination based on gender, sexual orientation, political or religious beliefs, or any other personal characteristic unrelated to the professional sphere.

## 2.2 Equality

---

All individuals who establish a working, professional, or personal relationship with Specialcavi Baldassari S.r.l. are required to respect the rights guaranteed by our legal system, including those related to privacy and equal opportunities. To this end, the company is committed to eliminating all forms of discrimination and prejudice, promoting an environment based on merit rather than personal characteristics.

## 2.3 Responsibility

---

The ethics of responsibility must inspire all recipients of this Code in the performance of their duties and in their daily conduct within the company.

Specialcavi Baldassari S.r.l. upholds compliance with laws and regulations—both in Italy and in the countries where it operates—as a fundamental principle. The recipients of this Code of Ethics are therefore required to comply with all applicable laws, and under no circumstances is it acceptable to pursue or achieve the company's interests in violation of the law.

## 2.4 Transparency

---

The principle of transparency requires that all information disclosed, both within and outside the company, be truthful, accurate, and complete. This means that in drafting contracts and in communications with employees, collaborators, suppliers, and customers, clear and understandable language must be used, and the information provided must always be correct and up to date.

# General ethical principles

## 2.5 Efficiency and Fairness

---

The principle of efficiency requires that, in every work activity, the company strives to provide a service that meets the needs of the customer, using the best tools available through technology and applying its many years of experience in the sector. This efficiency must always be achieved while respecting the principles of fairness, fair competition, and transparency, without using misleading or incomplete information to gain an unfair economic advantage.

# Relationship with employees

## 3.1 Fundamental rights

---

As previously mentioned, Specialcavi Baldassari S.r.l. places fundamental importance on those who carry out their work within the company. It recognizes as essential the right of every worker to receive compensation proportionate to the quantity and quality of their work, as well as the right to safety in the workplace.

The company also declares its full adherence to the principles established by the Universal Declaration of Human Rights and the International Labour Organization (ILO). It reaffirms its complete compliance with all applicable labor laws and emphasizes that it does not use or support, in any way—either in Italy or abroad—the use of child or underage labor.

## 3.2 Criteria for conduct

---

Specialcavi Baldassari S.r.l. identifies the following as standards of conduct that every employee, collaborator, or external professional must adhere to:

- Respect, including during the selection process, for the personality and dignity of each individual, avoiding situations that may cause discomfort;
- Prevention of all forms of discrimination and abuse, for example based on race, religious belief, political or union affiliation, language, gender, sexual orientation, or disability;
- Clear definition of roles, responsibilities, delegations, and access to information, enabling each person to make decisions within their remit in the best interest of the company;
- Careful, balanced, and objective exercise of the powers associated with delegated authority by those responsible for specific activities or organizational units;
- Proper and confidential use of personal data.
- 

To put these standards into practice, the company emphasizes that all involved parties must behave according to principles of civil coexistence and mutual cooperation, in order to foster a peaceful working environment.

## Relationship with third parties

### 4.1 Relations with customers and suppliers

---

As already stated in the general principles, this Code reaffirms that Specialcavi Baldassari S.r.l. aims to satisfy its customers by providing high-quality products and services in compliance with the applicable laws and regulations in the markets where it operates. The company is committed to ensuring that courtesy, attention, fairness, and clarity in communication are distinguishing features in its relationships with customers.

Regarding relationships with suppliers, the company ensures that they operate in ways that respect human and labor rights. To this end, it requires, for example, that suppliers refrain from using child or underage labor.

Those responsible for procurement may only accept gifts of modest value, within the bounds of normal business courtesy, and such gestures must not influence the selection of suppliers, which must be based on objective criteria such as competence and efficiency.

### 4.2 Relations with the Public Administration

---

Specialcavi Baldassari S.r.l. maintains relationships with various State administrations, public entities, local authorities, and public law organizations, always in a spirit of maximum collaboration and cooperation.

In particular, relations with public administrations must be guided by principles of transparency and fairness, enabling constructive dialogue whose ultimate goal is full compliance with the applicable regulations.

# Management mechanism

## 5.1 Administrative management

---

This Code aims to emphasize that the principles of fairness and transparency must also be applied to all operations related to the administrative and accounting fields. In particular, these principles are upheld through compliance with the laws and regulations applicable to the preparation of financial statements, accounting, and management activities.

The company also commits to maintaining appropriate documentation for every accounting transaction. Such documentation must be easily accessible and available for consultation by external auditing bodies, while also being archived in a way that ensures the confidentiality of the data it contains.

Any individual who becomes aware of omissions, tampering, falsifications, or negligence in accounting or documentation is required to report it to their immediate supervisor.

# Privacy and penalties

## 6.1 Processing of personal data

---

All recipients of this document are required to comply with the regulations on the protection and processing of personal data that they may become aware of in the course of their work activities.

The organization itself is committed to acquiring, storing, processing, and protecting any sensitive and personal data it comes into contact with during its operations.

All such information, once acquired by the company, may only be used, communicated, or disclosed in full compliance with the duties of diligence and loyalty established by applicable laws and employment contracts.

## 6.2 Penalties

---

In the event of serious or repeated violations of this Code, recipients may be subject to disciplinary actions as provided by law, the National Collective Labour Agreement (CCNL), and the Workers' Statute, in addition to liability for any damages resulting from such non-compliance.

Compliance with this Code by employees and collaborators is in addition to the general duties of loyalty, fairness, and performance of the employment contract in good faith, as set out in Article 2104 of the Italian Civil Code ("Diligence of the employee") and in the applicable legislation.

Specialcavi Baldassari S.r.l. considers compliance with this Code of Ethics to be of primary importance and is committed to providing all recipients with appropriate means to report any suggestions for improvement, additions, or violations observed.