

Code of Ethics of Nuova Elva S.r.l.

1. Introduction

This Code of Ethics defines the principles, values and rules of conduct that guide Nuova Elva S.r.l. in the performance of its activities.

It represents a framework for directors, managers, employees, collaborators, consultants, suppliers and, more generally, all parties acting in the name or on behalf of the Company or having business relationships with it.

This Code of Ethics forms an integral part of the Organisational, Management and Control Model adopted by the Company pursuant to Italian Legislative Decree 231/2001 and is aimed at preventing the commission of offences under such legislation.

Nuova Elva S.r.l., operating in the distribution of industrial automation components, recognises the importance of conduct based on legality, fairness, transparency, accountability, respect for individuals and sustainability, as essential elements for achieving its objectives and creating long-term value.

2. Purpose

The purpose of this Code of Ethics is to:

- define the Company's core values;
- guide the conduct of all recipients;
- prevent unethical or unlawful behaviour;
- strengthen the reputation and reliability of Nuova Elva S.r.l.;
- promote a respectful, inclusive and safe working environment;
- ensure transparency, fairness and traceability in business activities.

3. Scope of application

This Code applies to:

- shareholders and directors;
- employees at all levels;
- collaborators and consultants;
- agents and intermediaries;
- business partners;
- suppliers and contractors;
- any party acting, directly or indirectly, in the interest of the Company.

All recipients are required to be familiar with, comply with and apply this Code in the performance of their activities.

The Company promotes the inclusion of specific contractual clauses requiring compliance with this Code.

4. Core values and principles

NUOVA ELVA srl

Via Baraggiola 10
28010 - Vaprio D'Agogna (NO)
Italy

+39 0321 1855855
+39 0321 966955

info@nuovaelva.it
www.nuovaelva.it

P.IVA/VAT: IT 01392340038
Cap. Soc. € 93.600 int. vers



4.1 Legality

Nuova Elva S.r.l. operates in full compliance with applicable laws, regulations and internal rules in all countries and contexts in which it operates.

4.2 Integrity and fairness

The Company conducts its activities with honesty, loyalty, good faith, impartiality and fairness in both internal and external relationships.

4.3 Transparency and traceability

All operations, communications and relationships must be clear, complete, truthful and traceable, in accordance with roles, responsibilities and internal procedures.

4.4 Accountability

Nuova Elva S.r.l. promotes a culture of individual and collective responsibility, based on awareness of the economic, social, environmental and reputational impact of its actions.

4.5 Respect for individuals

The Company recognises the value of individuals, protects their dignity and promotes equal opportunities, inclusion, merit and professional development.

4.6 Confidentiality and data protection

Company, technical, commercial and personal information must be handled confidentially and in compliance with applicable data protection laws, including the GDPR.

4.7 Sustainability

Nuova Elva S.r.l. is committed to operating responsibly, taking into account the environmental, social and economic impacts of its activities.

5. Rules of conduct

5.1 Internal relations

All internal relationships must be based on mutual respect, cooperation, fairness and professionalism.

The following are not permitted:

- discrimination of any kind;
- harassment, abuse or offensive conduct;
- intimidating or inappropriate behaviour;
- favouritism not based on objective criteria.

The Company promotes a positive, inclusive and respectful working environment.

5.2 Health and safety at work

Nuova Elva S.r.l. considers health and safety protection a primary value.

The Company undertakes to:

- comply with applicable health and safety regulations;
- prevent risks and promote responsible behaviour;
- provide adequate training, information and tools;
- foster a culture of prevention.

All recipients must actively contribute to maintaining safe working conditions.

5.3 Relations with customers

The Company is committed to ensuring quality, fairness, reliability and transparency towards its customers.

In customer relations, Nuova Elva S.r.l. operates:

- in compliance with contractual commitments;
- with clarity in terms and conditions;
- with attention to customer needs;
- avoiding unfair, misleading or aggressive practices.

5.4 Relations with suppliers and partners

Suppliers and partners are selected based on competence, reliability, quality, economic criteria, fairness and legal compliance.

The Company establishes relationships based on:

- transparency;
- impartiality;
- mutual respect;
- promotion of quality and sustainability.

Suppliers are required to comply with the principles set out in this Code.

5.5 Relations with Public Authorities

Relations with public authorities, public bodies and regulatory authorities must be managed exclusively by authorised persons and in compliance with legality, fairness and transparency.

It is strictly prohibited to offer, promise or receive money or other benefits, directly or indirectly, aimed at influencing decisions or obtaining undue advantages.

5.6 Gifts and benefits

Only gifts of modest value and in line with legitimate business practices are permitted, provided they do not compromise integrity or independence of judgement.

It is strictly prohibited to:

- offer or accept money;
- grant or receive unjustified benefits;
- use one's position to obtain personal advantages.

5.7 Conflict of interest

All recipients must avoid situations, even potential ones, where personal interests conflict with those of the Company.

Any such situations must be promptly disclosed to the Company and appropriately managed.

5.8 Protection of company assets

Company assets, both tangible and intangible, must be used responsibly and exclusively for business purposes, unless otherwise authorised.

Any improper or unauthorised use is prohibited.

5.9 Use of IT systems and data

The Company promotes the correct and secure use of IT systems.

All recipients must comply with data protection laws and adopt appropriate measures to prevent cybersecurity risks.

5.10 Accounting records and financial transparency

All transactions must be properly authorised, recorded and verifiable.

Any falsification or alteration of accounting or financial information is strictly prohibited.

6. Human resources and equal opportunities

The Company recognises the strategic value of human resources and is committed to:

- ensuring equal opportunities;
- promoting merit and professional development;
- preventing discrimination;
- encouraging continuous training.

7. Environmental protection and social responsibility

Nuova Elva S.r.l. promotes responsible management of its activities.

The Company undertakes to:

- comply with environmental regulations;
- reduce environmental impact;
- promote sustainable practices.

8. Reporting and violations (Whistleblowing)

The Company encourages the reporting, in good faith, of conduct that violates this Code or applicable laws.

Reporting channels compliant with applicable whistleblowing regulations are in place, ensuring confidentiality and protection against retaliation.

9. Supervisory body

Nuova Elva S.r.l. has established a Supervisory Body responsible for monitoring the effectiveness and compliance with this Code and the Model 231.

The Supervisory Body operates with autonomy, independence and powers of initiative and control.

10. Disciplinary system

Breaches of this Code result in disciplinary measures proportionate to the seriousness of the conduct, in accordance with applicable laws.

Such measures apply to:

- employees;
- managers;
- collaborators;
- suppliers and partners.

11. Implementation and dissemination

Nuova Elva S.r.l. undertakes to:

- disseminate this Code;
- ensure its understanding;
- promote its application;
- update it periodically.

12. Final provisions

Compliance with this Code of Ethics is an essential requirement for all those working with Nuova Elva S.r.l.

The Company considers adherence to these principles fundamental to building trust, strengthening its reputation and achieving sustainable long-term development.