

The background features a complex, abstract geometric pattern of overlapping lines and shapes in shades of gray and light blue, set against a pale yellow background. The lines form various polygons and spirals, creating a sense of depth and movement.

# **CENTROTECNICA**

**code of ethics**

Centrotecnica is a company founded on strong values, established by its founders and upheld as fundamental pillars of the organization.

These values have enabled the creation of a company with a solid ethical foundation, a strong focus on sustainable growth, and a rigorous approach to legality and inclusion.

This Code of Ethics represents the formalization of our values.

Every Centrotecnica employee is personally called upon to respect, promote, and safeguard the values expressed in this Code.

Those in managerial or leadership roles are required to act in accordance with the principles of this Code and to set an example, demonstrating through their behaviour that compliance with rules is an essential part of work, and that business results must never come at the expense of ethical values.

Andrea Cambiaghi

CENTROTECNICA Srl Founder



# VISION

Intelligence - understood as the ability to understand reality, think rationally, draw on experience, apply reasoning, adapt, and use creativity to achieve functional, innovative solutions - is what we aim to bring into our daily work.

For this reason, “selling intelligence” is our Vision, applied across all areas of activity, both in the supply of products and in the delivery of services.

We believe that our market, products, and services may evolve, but our future will always be secured by consistently pursuing the path of delivering products and services developed through a distinctive application of intelligence.



# VALUES

**HONESTY:** acting with loyalty, fairness, and integrity in relationships with all stakeholders—customers, employees, and suppliers—building lasting trust and reputation through ethical and responsible behaviours.

**PASSION:** working with enthusiasm and determination, turning challenges into opportunities and putting both heart and expertise into everything we do. Passion is the driving force behind our actions.

**COMPETENCE:** acting with preparation, precision, and awareness; continuously updating one's knowledge, sharing expertise, and recognizing when it is necessary to seek support or further insight. Competence is both an individual and collective responsibility, essential to meeting customer expectations in terms of performance and safety.

**TRANSPARENCY:** avoiding ambiguity by communicating in an honest, clear, accurate, and timely manner, and ensuring processes are traceable. Encouraging dialogue, embracing diverse perspectives, and fostering change by sharing information with integrity and responsibility, thus promoting trust among all stakeholders.

**CONFIDENTIALITY:** protecting entrusted information means safeguarding the trust of individuals, customers, and partners, contributing to an ethical and secure professional environment. Each employee is required to protect personal data, confidential information, and company know-how, avoiding any improper use or unauthorized disclosure.

**CUSTOMER ORIENTATION:** understanding the market and considering the impact of every action and behaviour on customers; placing the customer at the centre of our work, with the goal of building relationships based on trust, active listening, and the ability to anticipate needs. Every customer represents an opportunity to improve and grow together.



**CONTINUOUS IMPROVEMENT:** seeking better solutions, proposing ideas, learning from mistakes, embracing change, and actively contributing to the evolution of processes. Each individual is responsible for their own growth as well as that of the company.

**SUSTAINABLE GROWTH:** adopting responsible behaviours, reducing waste and environmental impacts, promoting inclusion, supporting local communities, and contributing through ethical and forward-looking choices to the development of the company and society. Not sacrificing the future for today's profit.

**RESPECT FOR PEOPLE:** recognizing and safeguarding the dignity, rights, opinions, and diversity of every individual, promoting a fair, safe, and inclusive work environment. Acknowledging and respecting the work of others and professional relationships.

**ORIGINALITY:** not creating products or services as copies of existing market offerings, but always striving to foster innovation through original solutions and service.



# WORK AND HUMAN RIGHTS

*“...contributing through ethical and forward-looking choices to the development of the company and society: not sacrificing the future for today’s profit.”*



## **WORK AND HUMAN RIGHTS**

Respect for human rights is a fundamental value and an essential requirement for all activities carried out in the workplace.

Centrotecnica operates in accordance with major international standards and applicable national regulations, ensuring safe, fair, and inclusive working conditions, free from discrimination, and based on the recognition of the rights and dignity of every individual.

## **DIVERSITY AND INCLUSION**

Centrotecnica promotes a fair, inclusive, and respectful work environment where every individual is treated with dignity and respect.

The company rejects all forms of discrimination in hiring and employment practices, regardless of gender, age, ethnic origin, nationality, religion, physical or mental disability, union membership, political affiliation, or sexual orientation.

Centrotecnica values diversity and inclusion, ensuring equal opportunities for access to training, professional growth, and career development. The company firmly condemns all forms of abuse, harassment, threats, or inappropriate behaviour, whether physical, psychological, or sexual in nature



## **FORCED LABOR AND CHILD LABOR**

Centrotecnica safeguards the right to free and voluntary work, condemning all forms of forced, bonded, coerced, or involuntary labour, labour exploitation, enslavement, illegal labour recruitment, work obtained through the unlawful retention of documents, and prisoner labour that does not comply with regulations.

Centrotecnica is committed to preventing any practices that may be considered cruel, degrading, or inhumane, and to ensuring working conditions that respect the dignity of the individual.

Centrotecnica does not tolerate child labour in any form and ensures full compliance with local laws regarding minimum employment age

## **COMPENSATION, BENEFITS, AND WORKING HOURS**

Centrotecnica ensures full compliance with applicable regulations regarding working hours and compensation.

Salaries, benefits, and working conditions are defined to guarantee an adequate standard of living for employees and their families, and the same conditions and opportunities are provided to all employees.

Working hours and rest periods comply with applicable laws and regulations.

## **FREEDOM OF ASSOCIATION**

Centrotecnica promotes open and constructive dialogue with its employees and trade union representatives.

In accordance with local regulations, Centrotecnica ensures the respect of every worker's right to freely associate, join trade unions, be represented, participate in company committees, and engage in collective bargaining.



## **WORKER HEALTH AND SAFETY**

Centrotecnica ensures full compliance with applicable laws and regulations concerning occupational health and safety, workplace hygiene, and accident prevention.

The company is committed to creating a work environment that rigorously and systematically prioritizes health and safety through the proactive identification and assessment of risks, aiming to prevent or manage them effectively.

Consultation with employees is considered an essential tool for identifying risks, managing them, and improving operational practices.



# ENVIRONMENTAL PROTECTION AND RESPECT

*“...develop business activities with careful attention to natural resources and ecological balance: growing today without compromising the opportunities of tomorrow.”*



## **ENVIRONMENTAL PROTECTION AND RESPECT**

Centrotecnica recognizes the importance of environmental protection as an essential condition for ensuring the well-being of future generations.

For this reason, the company integrates the principles of environmental sustainability into its strategic decisions and operational processes, promoting a model of development that is responsible and respectful of the ecosystem.

### **ENVIRONMENTAL COMPLIANCE: ADHERENCE TO LAWS AND REGULATIONS**

Centrotecnica considers compliance with applicable laws and regulations in all the communities in which it operates a fundamental prerequisite for every business relationship.

The company operates in accordance with current environmental regulations, obtaining all necessary authorizations to conduct its activities and ensuring that these requirements are consistently maintained and updated over time.



## ENVIRONMENTAL PROTECTION: RESPONSIBLE USE OF RESOURCES

Centrotecnica considers the conservation of natural resources and the protection of air, water, and soil from anthropogenic contamination as permanent and priority objectives. Furthermore, the company recognizes the fight against climate change and the construction of a sustainable future as essential.

It contributes to these goals through decarbonization strategies, adapting its processes and operational models to ensure continuity, ecosystem protection, and long-term sustainability.

These objectives are pursued through a preventive approach focused on innovation, the adoption of the best available technologies, and the continuous improvement of process and product quality. The company is also committed to developing innovative solutions to minimize the use of raw materials and maximize the recovery of waste and production residues within a circular economy framework (or by identifying less resource-intensive alternatives). Waste disposal is considered a last-resort option, only after all possibilities for reuse, recycling, and recovery have been evaluated.

Centrotecnica is further committed to optimizing energy management and progressively reducing direct and indirect energy consumption through an approach that includes:

- increasing use of renewable energy sources, including self-production (e.g., photovoltaic systems) and the purchase of certified green energy;
- periodic evaluation of opportunities for improvement in energy efficiency through interventions on machinery or processes.

The company ensures the correct management, conservation, and disposal of materials, production residues, and waste in full compliance with applicable regulations.

It provides timely information on the safety of the materials used and keeps all supporting technical documentation, such as safety data sheets, up to date.



# GOVERNANCE

*“...operating with integrity and transparency in all business activities: no result justifies behaviour contrary to the law or ethics.”*



## **RESPONSIBLE BUSINESS AND ETHICAL CONDUCT**

Centrotecnica operates in accordance with principles of integrity, loyalty, and fairness, providing products and services within the rules of free competition while safeguarding the interests of employees, customers, partners, and local communities.

The company promotes a governance and risk management system through its own Code of Ethics to engage stakeholders.

Compliance with the Code of Ethics is an essential requirement for any business relationship with Centrotecnica.

## **ANTI-CORRUPTION AND ANTI-MONEY LAUNDERING**

Centrotecnica adopts and promotes a strict policy against corruption and money laundering, directed at both employees and business partners.

Any form of corrupt practice, whether active or passive—including illicit favours, collusive behaviour, gifts, or hospitality not in line with company guidelines—is strictly prohibited.

Centrotecnica requires that no one, inside or outside the company, offers, promises, accepts, or authorizes money, gifts, or other benefits with the purpose, even implicitly, to:

- improperly influence the activities or decisions of public or private entities;
- obtain undue advantages;
- more generally, violate applicable laws or regulations.

Any attempt or solicitation in this regard must be promptly reported to Centrotecnica Management via email at [Whistleblowing@ctecnica.it](mailto:Whistleblowing@ctecnica.it).



## **PROHIBITION OF FACILITATION PAYMENTS**

Centrotecnica strictly prohibits any form of facilitation payment, understood as unofficial payments intended to accelerate, favour, or guarantee the execution of an activity.

This prohibition applies to all activities carried out by Centrotecnica to protect integrity and transparency.

## **ANTITRUST RULES AND PROMOTION OF FAIR COMPETITION**

Centrotecnica adopts and promotes an antitrust policy that ensures compliance with the principles of fair competition.

Any practice that restricts free competition is prohibited.

Centrotecnica commits to conducting all its activities in full compliance with fair competition principles and applicable antitrust regulations, avoiding agreements, collusion, price-fixing, or other unfair commercial practices that may unlawfully restrict market exchanges or competition.

## **CONFLICTS OF INTEREST**

Centrotecnica considers trust and transparency as essential foundations for establishing solid and lasting business relationships with its partners. In line with this principle, any situation that may create a conflict of interest, compromising staff's ability to make valid, impartial, and objective decisions, must be promptly reported to the company.

Centrotecnica will assess the actual presence and severity of the conflict and adopt the most appropriate measures to manage it.



## **CONFIDENTIALITY AND DATA PROTECTION**

Centrotecnica assigns great importance to the proper management of information that constitutes company assets and requires all parties involved to adhere to this principle.

Confidential information belonging to Centrotecnica may not be communicated or disclosed without specific authorization from the company.

Centrotecnica commits to using confidential information solely for authorized purposes and to adequately protect, among other things, confidential information, industrial and intellectual property, know-how, and trade secrets, whether owned or shared by third parties.

The confidentiality obligation remains even after the termination of the relationship, in compliance with applicable regulations and agreements.

Furthermore, Centrotecnica manages personal data in accordance with data protection laws (GDPR), adopting appropriate procedures and security measures. Personal data collected are used exclusively for legitimate, defined, and appropriate purposes.

## **USE OF ARTIFICIAL INTELLIGENCE (AI) TOOLS**

The company allows the use of AI tools exclusively to support professional activities (e.g., text processing, translations, legal research), ensuring that their use respects confidentiality, applicable regulations, and remains under the full responsibility of the user, who maintains control and verification of the generated content.

Similarly, AI systems may be used for generating images or visual content, provided that such content is not misleading, does not deceive recipients or third parties, and is not used to represent as real situations, people, or events that are not real.

Users are required to ensure transparency and proper use of these tools, adhering to principles of truthfulness, fairness, and responsibility.



# SUSTAINABLE PROCUREMENT

*“...building a supply chain based on transparency, responsibility, and respect for rights: the value of a company is also measured by the selection of its partners.”*



## **SUSTAINABLE PROCUREMENT**

Centrotecnica is committed to promoting principles of ethics, integrity, and sustainability across the entire supply chain by implementing supplier awareness policies aimed at reducing economic, environmental, and social impacts associated with procurement activities.

The company does not accept the use of materials or raw materials sourced from regions affected by armed conflicts, severe political instability, or violence that could compromise fundamental human rights or the safety of local communities.

Centrotecnica requires its suppliers to ensure traceability of sources and the absence of links to illegal practices or human rights violations.

These principles and values are considered an integral part of commercial negotiations. Any violation, following assessment, may result in suspension of supply and, if deemed serious, repeated, or unremedied, may lead to the exclusion of the supplier from the approved supplier list (blacklisting)”



## MANAGEMENT OF SENSITIVE CONTRACTS AND REGULATED PRODUCTS

Article 11 of the Italian Constitution states: “Italy repudiates war as an instrument of aggression against the freedom of other peoples and as a means of resolving international disputes; it allows, on equal terms with other States, the necessary limitations of sovereignty for an order that ensures peace and justice among nations; it promotes and supports international organizations aimed at this purpose.”

The prohibition of Article 11 concerns aggression against other peoples, not the defence, including armed, of the homeland (which is, according to Article 52, para. 1, a “sacred duty of the citizen”), as confirmed by the norms regarding the Armed Forces (Article 52, para. 3) and the regulation of “state of war” (Articles 60, 78, 87, 103, para. 2).

Within this framework, Centrotecnica, as an integral part of Italian society and subject to Italian law, aware of the need to support national and European defence together with NATO allied countries, cannot refuse to handle products and services related to the defence and armaments sector, in compliance with Italian law and the laws of any partner countries.

Products or services related to the manufacture of controversial or internationally banned weapons are, of course, excluded from any negotiation.



# WHISTLEBLOWING AND REPORTING SYSTEM

*“Centrotecnica ensures the confidentiality of communications, protection of the whistleblower, and prohibition of any retaliation against those who report a suspected violation in good faith.”*



## WHISTLEBLOWING AND REPORTING SYSTEM

Centrotecnica has established a reporting system compliant with applicable regulations, guaranteeing confidentiality, protection of whistleblowers, and prohibition of any form of retaliation or discrimination against anyone (employees or third parties) who reports a suspected violation in good faith.

Anyone aware of violations, actual or suspected, of this Code is required to promptly report them via email to [whistleblowing@ctecnica.it](mailto:whistleblowing@ctecnica.it).

Reports must be made in good faith and based on reasonable grounds to believe that the information indicates a violation. Any accusation found to be unfounded and made maliciously or intentionally false will be considered a serious disciplinary offense: employees may face disciplinary action under applicable labour laws and contracts, and third parties may be excluded from commercial relations with Centrotecnica.

Reports concerning violations of ethical principles will be analysed by the Sustainability Committee within 10 working days from receipt of the formal report.



## **VIOLATIONS**

In compliance with privacy and labour regulations, monitoring of company computers and devices provided to employees may be conducted to detect and eliminate computer viruses and ensure system integrity and security.

Violations of Centrotecnica's Code of Ethics constitute conduct subject to disciplinary and contractual sanctions.

Employees: disciplinary sanctions provided by law and the applicable national collective labour agreement may be applied, as compliance with the Code is considered an integral part of the company's working methods.



## **APPLICATION OF THE CODE OF ETHICS**

The Code of Ethics is published on Centrotecnica's official website to disseminate its principles to both employees and stakeholders, including business partners, who are required to acknowledge and adhere to its principles when engaging with Centrotecnica.

The company, directly or through third parties, reserves the right to request documentation and conduct audits at partner facilities to verify compliance with the Code.

In case of negative findings, Centrotecnica will encourage dialogue to implement corrective actions; if such measures are not taken, or in the presence of serious and repeated violations, the company may suspend or unilaterally terminate contractual relationships.

Commercial partners are responsible for ensuring compliance with the Code within their organizations and throughout the supply chain, promptly reporting any critical issues or violations to Centrotecnica.

Other parties (collaborators, suppliers, etc.): the company may apply commercial sanctions, such as termination of existing contracts and, in severe cases, exclusion from any future business relationship.

Sanctions will be determined based on circumstances and potential recidivism.

## **FINAL PROVISIONS**

This Code of Ethics is approved by the Legal Representative and comes into force on 03/11/2025.

It will be reviewed and updated by the Sustainability Committee at least every two years and, in any case, whenever deemed appropriate or necessary..



