



ETHICAL CODE

FTG SAFETY SHOES Srl

Reference	Revision	Date	Approved by
Ethical Code	2	10.12.2022	Sole Administrator Luciano Trevisan



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- INTRODUCTION

The current document, named Ethical code, contains the ethical, moral and social principles to whom the company is based to manage its own activities and inspire its interlocutors to maintain established behaviours and cultures. The current Ethical Code must be available for all the employees, Administrators, Managers, consultants and all the people (directly or indirectly) in relation with the company.

1. ETHICAL CODE GENERAL PRINCIPLES

FTG Safety Shoes srl believes in morality, equality, protection of the individual and its health, perseverance, transparency, honesty, protection of the environment and loyal competition. With this aim the company assume as priority tasks:

- **Respect of the law and general normative;**
- **Respect the principles of: honesty, transparency, decency, integrity and confidentiality;**
- **Promote the correct and operational use of the company resources**
- **Guarantee the safety of work operations**
- **Guarantee the right use of economical and financial resources**
- **Periodical check on the respect of the ethical code applying appropriate sanctions in case of violation;**

2. COMPANY ACTIVITIES MANAGEMENT

The company in the execution and management of its own activities is inspired by principles of honesty, proper use of company resources and goods, accuracy and transparency to manage the information.

The operations and transactions must be sufficiently supported by documents with the aim to control and certify roles and responsibility, characteristics and reasons of the same operations.

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– CONFLICT OF INTERESTS

Everybody must avoid situation of conflict of interest or circumstances where they can take advantages from opportunities known during their activity inside the company. No one can earn personal profit or advantages paid by the company, suppliers or third part in contact with the company. Offering or receiving gifts, money to employees or people involved in the company represent a potential source of conflict of interest. Any gift, entertainment or money that can influence decisions is not acceptable.

Disbursement or receiving payments or illegal incentives like bribe or payments to incentivate something or other kind of corruption is against the company policy. We consider corruption also when the bribe is given by or through a third person.

All workers must keep their knowledge regarding company know how, documents, general information secret. Are considered reserved and secret all information regarding contracts, patents, creations, new technology or all information that can potentially create a damage to the company or illegal enrichment of the employees.

– SAFEGUARD OF COMPANY RESOURCES

All workers employed and all subjects addressed of the ethical code using company assets for their job are responsible for those. They have to use all assets properly, responsibly respecting procedures of the company. Employees can't use company assets privately. They have to inform supervisor in case of damages of the items.



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– INTERNAL INFORMATION AND PRIVACY

All workers employed and others addressed of the ethical code that find out about confidential information can't use those for personal purposes and advantages or for third part advantages. Confidentiality commitment continue after ending the business realtion with FTG SAFETY SHOES.

The consignees of the ethical code in the execution of their working activity might learn personal information protect by privacy law. The confidentiality of those information is grant by the respect of the law regarding protection of personal information (Regulations UE n. 679/2016).

– PRINCIPLES CONCERNING ENVIRONMENT AND SECURITY

The company is sensitive to environment problems and promote the acceptance and diffusion of environment policy. We continuously make activities turned to improve goals concerning protection and management of environment and pollution.

Therefore, company's goals are:

- **to manage natural resources and energy in a sustainable way, giving value to its use and reducing waste;**
- **to lead production activities applying criteria to prevent pollution and reduce environment risks, putting more attention on environments aspects of each production phase;**
- **to reduce quantity of waste increasing activity to salvage them instead of disposal;**
- **to ensure the strict respect of the environment legislation and to carefully follow its evolution adapting to its prescriptions.**

In the company is widespread the culture of occupational safety in agreement with actual legislation. it is guaranteed worker dignity and working condition that didn't make happen potential discrimination concerning sex, age, race, nationality, sexual tendency and religious convictions. It is protect the privacy in compliance with the actual norms.

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3. RELATIONSHIP WITH STAKEHOLDER

– CUSTOMERS RELATIONSHIP

Mission of the company is full customer satisfaction referring to expected quality standards respecting contractual obligation and actual norms concerning product and process. Are expected supervision activity for customer satisfaction to check the achievement of improvement goals of quality standards. The company checks the accuracy and feasibility of all services for the customers referring to norms, technical and economical condition. The purpose is to make sure all contractual obligations are taken considering logistic, production and financial sustainability without compromising quality standards, occupational safety and economical and financial balance. During customers relation management the company grants sincerity and accuracy during commercial negotiations and later (after order acquisition) an appropriate control activity to grant fulfilment of obligations.

- SUPPLIERS RELATIONSHIP

Selections of suppliers to purchase goods and services is made respecting valuations in terms of transparency, equal conditions for quality and prices. Potential suppliers can directly or indirectly participate to the production process for goods and services for customers towards whom the company is committed to respect the above principles, the company must guarantee quality, technical- organizational structure, enough financial resources in order to avoid contractual non-execution. The company through its Quality Manager controls the accuracy and quality of required goods and services. The Purchasing Manager must assure neutrality and discretion and can't accept payments or tasks of any nature from them. Among suppliers are also contractors, in other words independent external company designated to make some production phases. Also in this case honesty, professionalism, competence must be guaranteed. Relationship with them must be characterized by full transparency, precision and equity.



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4. ETHICAL CODE PROCEDURE OF DIFFUSION AND REALIZATION

Ethical Code must be known by all involved subjects, internal and external through appropriate communication activities. It is delivered during hiring phase, it is displayed in the company electronic portal and it is published in the company web site. Norms violation and non-observance of the principles included in this Ethical Code will affect the trust relationship with the company. All operators involved (both internal and external) must point out potential non-observance of this Ethical code. Non observance of the principles regulated by the Ethical Code is subject to sanctions with disciplinary actions based on the seriousness of the violation, independently from potential penal arbitration if the behaviour represent a crime.

Signature
Sole Administrator
Luciano Trevisan

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