



STERLING

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# CODE of CONDUCT



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## Foreword

With this Code of Conduct, we intend to enforce our ethical and social principles together with our employees, collaborators and suppliers to protect and further develop the integrity of our company and build a better future for our society.

The continuous and steady development of our company largely depends on our reputation as a reliable business partner and our commitment to social responsibility.

The Code of Conduct has been adopted by the Management and applies to all board members, managers and all company staff.

The standards listed below are our company's core values and we believe that they should also be respected by our suppliers, who are obliged to inform us without delay in the event of non-compliance.

In case of non-fulfilment by a business partner, business relations are not terminated with immediate effect, but rather undergo a critical review so that the supplier can work towards meeting the required standards.

In the event of serious or repeated failure to comply with the principles, the business relationship will be terminated with immediate effect.

Thank you for your commitment to building our corporate and social culture.

Alpignano, 05/02/2021

*Cristian Cullino*  
CEO



## **We respect current legislation**

Compliance with applicable laws and regulations is unquestionable for us – at local, national and international levels.

Legal compliance ensures our business success worldwide; any breach can have serious consequences, such as criminal prosecution, compensation for damages or reduction and damage of reputation and credibility.

In specific geographical areas, markets or with respect to certain business partners, there may be rules that are more restrictive than those described in this Code of Conduct. In such cases, in principle, the more restrictive rules should apply.



## **We ensure fairness and accuracy in financial reporting**

We correctly record every operation and transaction in the company's accounting system according to the criteria indicated by law and by the applicable accounting principles.

The records are supported by adequate documentation in order to allow, at any time, the controls to certify the characteristics and reasons and to identify who authorised, performed, recorded and verified the operation itself.

Personnel shall cooperate, as far as it is within their competence, so that any fact relating to the management of the company is correctly and promptly recorded in the accounts and it is the duty of each employee and collaborator to ensure that the supporting documentation is tidy and easily available.



## **We respect import/export regulations**

We ensure compliance with all regulations for cross-border trade in goods, services and information.

We manage export and import operations by complying with bans, restrictions, licensing requirements and other monitoring measures.

The transaction control regulations also apply to technology, technical drawings and software programs. Regardless of the entity of supply, transactions with people or companies on the sanction lists are also prohibited.

When importing or exporting products and services, the personnel must always report any doubts to the import/export control department, which must be actively informed and consulted.





## **We guarantee a fair and respectful working environment**

Our employees and collaborators work in an environment that is fair, equal and respectful of the dignity of each individual.

Salaries, including overtime and special allowances, are equal to or higher than the level set by applicable laws and regulations.

The company complies with applicable laws, collective bargaining and industry standards on working time, rest periods and public holidays.

All suppliers shall also ensure that wages and ancillary services are paid in full compliance with all applicable laws and that there is not labour subordination or false training relationships, to circumvent obligations towards personnel under applicable labour and social security laws and regulations.



## **We do not use forced or child labour**

We do not accept or tolerate any form of forced or child labour and do not contract with suppliers who use such labour.

No person subject to compulsory schooling or younger than 15 years of age may be employed, unless local legislation establishes a higher age limit and applicable laws or regulations permit an exception.

Workers under the age of 18 are not allowed to perform hazardous work and may be exempted from certain activities taking into account their training needs.



## **We do not tolerate discrimination and harassment**

In all personnel decisions, particularly concerning recruitment, promotion, remuneration, training, termination of employment, all employees are considered exclusively on the basis of objective criteria: their skills, qualifications and conduct.

Harassment, aggression and abuse, physical, psychological or verbal, are not tolerated.

Personal insults and harassment are not tolerated in the workplace. This includes all forms of unwanted behaviour, whether verbal, non-verbal or physical.





## **We provide a healthy and safe working environment**

We promote and protect occupational health and safety as a key element of the sustainability of our success.

We ensure a safe and comfortable working environment in order to prevent occupational injuries and illnesses for employees and collaborators, with the important aim of promoting a culture of safety at work also among our partners.

To prevent accidents and injuries, workers must always have a safe and healthy working environment, the minimum requirements of which are defined by current local legislation.



## **Protecting the environment**

We respect, protect and safeguard our environment by following the environmental laws and regulations of the country in which we operate.

The company's activities are conducted in such a way that natural resources are used as efficiently as possible.

Hazardous substances are used to a limited extent, in a conscientious manner and with minimal impact on the environment.

All waste generated during the activities is disposed of in an environmentally responsible way.



## **We assume our social responsibility**

We are committed to promoting human rights, with particular respect for integrity, honesty, respect for human dignity, acceptance and non-discrimination on grounds of religion, ideology, gender or ethnicity or political opinion.

We do not promote the political opinion-forming in the company, banning political activities on company premises, by means or on behalf of the company.

Furthermore, any form of corruption, active or passive, is prohibited, because under competition our focus is on professional conduct, where high quality of the performed work is the only yardstick.

We make our decisions exclusively on the basis of objective criteria and are not influenced by personal interests and relationships, avoiding any potential conflict of interest, because we are convinced that transparent and recognised business practices always lead to success.







## **We protect intellectual and industrial property**

We are aware of the importance of intellectual and industrial property and therefore we respect and protect it in all its forms, both our own and those of others, whether they be copyrights, patents, trademarks or products.

Personnel are required to actively contribute, within the scope of their functions and responsibilities, to the safeguarding and management of intellectual property in order to enable its development, protection and growth.

In doing so, they must refrain from using company and partner intellectual property, or allowing others to use it, for personal purposes, as well as refraining from altering or counterfeiting patents, designs or industrial projects in any way.

In this regard, it is also forbidden to purchase or make use, in an industrial or commercial context, of products, patents, designs or industrial projects that have been altered or counterfeited by third parties.



## **We protect personal privacy**

We protect the personal data of customers, suppliers, employees and contractors in accordance with GDPR 2016/679.

In principle, the collection, storage, processing and use of personal data always require the consent of the data subject, a contractual agreement or other legal basis.

Company staff are obliged to work in accordance with the valid and applicable guidelines for the processing of personal data, and in case of doubt, they should contact their manager or the data protection officer.

All aspects of data protection and IT security are described in the management system and must be scrupulously observed by all staff.



## **We communicate effectively**

We take our responsibility as a working group and communicate at all levels and in many directions, promoting discussion and exchange of views.

We use a corporate communication strategy in internal and external communication to communicate our culture, values and corporate norms.

All managers are required to be familiar with the laws, regulations and internal company procedures relevant to their area of responsibility and to disseminate them fully and clearly to their team.

In-depth sector knowledge is also required, particularly for managers who, by function or by position in a collective body, have specific responsibility for ensuring corporate compliance.

