

ETHICAL RULES

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1 INTRODUCTION

The NEWTON TRASFORMATORI S.p.A., in compliance with the provisions of the Legislative Decree 231/2001, decided to proceed with the preparation of this ETHICS RULES, which gathers together the principles of correctness, loyalty, integrity, transparency, moral and professional commitment that, since the constitution, shape relationships of the Company towards staff and third parties and which, more generally, characterize the performance of the work activities of the Company's personnel.

The role played by NEWTON TRASFORMATORI S.p.A. on the market, nature and the importance of the activity from the same turning point, presuppose the commitment on the part of those that operate in the Company, or in any way and for any reason on behalf of this, and assume behaviors based on principles of loyalty, seriousness, honesty, competence and transparency as well as the timely compliance with laws, market rules, of the principles inspiring fair competition, respecting legitimate interests of the expectations of customers, suppliers, partners and anyone who comes into contact with business operations.

So that relationships within the Company can be properly developed as well those with the external environment, it is necessary that all the recipients of this ETHICS RULES, meaning administrators, employees, collaborators, and more general, all those who cooperate, for whatever reason, in the pursuit of the ends of the Society in the context of the different relationships they have with the itself, cultivate and make available to the Company its cultural baggage, technical, operational and ethical for the achievement of the aforementioned aims, each within the scope of its functions and responsibilities and in compliance with the functions and liability of others.

2 ETHICS RULES OF NEWTON TRASFORMATORI SpA

NEWTON TRASFORMATORI SpA undertakes to:

2.1 Compliance with laws

- comply with the laws of the legal systems applicable from time to time.

2.2 Prohibition of corruption

- not to admit or take any form of corruption, including payments or other forms of benefits granted to our employees or collaborators in order to influence decisions against law.

2.3 Respect for the fundamental human rights of employees

- promote equal opportunities for its employees, as well as fair treatment of the same, regardless of skin color, race, nationality, background social, disability, sexual orientation, political or religious faith, sex or age;
- respect the personal dignity, privacy and rights of each individual;
- refrain from hiring or making someone work against his will;
- Do not allow any unacceptable treatment of employees, such as cruelty mental, sexual harassment or discrimination; are prohibit any behavior that is sexually offensive, coercive, threatening, abusive or exploitative, including gestures, language and physical contact.
- provide adequate remuneration and guarantee the national minimum wage mandatory current;
- comply with the maximum number of working hours established by the applicable rules;
- recognize, as far as legally possible, the right to free association of employees and not to support or discriminate against members of membership organizations of employees or trade unions.

2.4 Prohibition of child labor

- not to employ workers under the age of 15 or, in countries subject to exemption for developing countries of ILO Convention 138 (Organization International Labor), do not hire workers under the age of 14.

2.5 Health and safety of employees

- take responsibility for the health and safety of employees;
- monitor the dangers and take precautionary measures the most adequate against accidents and occupational diseases;
- offer training activities and ensure that employees are informed about health and safety issues;
- set up and use a safety and health management system workers according to the OHSAS 18001 standard or equivalent system.

2.6 Environmental protection

- act in compliance with statutory and international regulations on environmental protection;
- minimize pollution and make continuous improvements for protection the environment;
- set up or use an environmental management system in accordance with the standard ISO 14001 or equivalent system.

2.7 Supply chain

- strive to promote compliance with this Ethics Rules in its own providers;
- comply with the principles of non-discrimination regarding selection and treatment of suppliers.

3 BUSINESS REGULATIONS

3.1 Applicability

This regulation is prepared by NEWTON TRASFORMATORI S.p.A. in order to regularize the performance of the work activities of the personnel of the Company (employees) and external collaborators, including commercial agents (collaborators).

3.2 Performance of work activities

Dependent and collaborator must fulfill due performance with diligence required by the nature of the service itself and by the interest of the company, respecting the qualitative and quantitative criteria for the service itself, established in applicable documentation: standards, procedures, instructions, work files, drawings, etc.

It is forbidden for employees and collaborators to return to the premises of the company and stay longer the prescribed time (except in the case of overtime), if not for service reasons and with the authorization of the Company.

3.3 Behavior

The employee and collaborator is obliged to use courteous and respectful methods with the public and with the clients of the Company, and to conduct in accordance with the civics duties. The right and duty of everyone to claim and respect the decorum is recalled in clothing and hygiene in the workplace.

Every employee and collaborator is required to work diligently to protect the assets company, through responsible behavior and in line with procedures operational guidelines.

In particular, each employee and collaborator must:

- use company assets exclusively for the performance of tasks work: appropriation and use for personal purposes are not allowed.
- avoid improper use of company assets (tangible and intangible) which may cause damage or reduced efficiency;
- avoid the use of company assets by parties outside the Company.

The employee is prohibited from using the mobile phone for personal purposes in course of the working activity, except for particular and urgent needs, with prior authorization request. It is also forbidden to use any other electronic device for personal purposes during work, if not authorized by the Management.

The ban on alcoholic beverages is absolute in any company premises, including the canteen. The smoking ban is absolute in any company premises and in the canteen, as required by law.

The violation of this prohibition, as well as not comply with existing laws and regulations, cause damage and risk to people and property that are inside the rooms themselves.

3.4 Duties of employees and collaborators

The employee and collaborator must act fairly in order to comply with the obligations signed in the contract of employment or in the contract of collaboration and what is foreseen from this Code of Ethics, ensuring the required performance.

All employees and collaborators are required to avoid and to abstain from personally taking advantage of business opportunities they came to knowledge in the course of performing their duties, in particular not must:

- perform a top function and have economic interests with suppliers, and/or customers also through family members;
- take care of relationships with suppliers and carry out work, even on behalf of a family member at suppliers;
- accepting money or favors from people or companies that are or intend to enter in business relations with NEWTON TRASFORMATORI S.p.A ..

In the event that even a single appearance appears, a situation that can determine the non-compliance of a duty in the work activity it is necessary to immediately notify the company management.

Every employee and collaborator must not delay or delegate to others the carrying out of activities or the adoption of decisions pertaining to them.

As for IT and telephone tools (hardware and software, telephone lines), all employees and collaborators are required:

- to scrupulously adopt the provisions of the security policies company, in order not to compromise the functionality and protection of informatic systems;
- not to send threatening and abusive e-mail messages and not to resort to low-level language;
- to not express inappropriate comments that could offend the person and/or damage to the corporate image;
- not to browse Internet sites with indecent and offensive content;
- not to use company telephone lines for personal needs except urgent cases.

Every employee and collaborator is required, in the company, not to serve under the effect of alcoholic substances, drugs or substances having a similar effect, hold consume or transfer drugs for whatever reason.

It is prejudicial behavior to the image of the Company to carry out activities of trade of any entity and of any nature.

3.5 *Material supplied*

Every employee and collaborator is responsible for protecting the resources to him entrusted.

The employee and the collaborator is responsible for the material and the tools they have been in delivery for the performance of work and has the duty to inform promptly the function in charge of any harmful events for the Company.

Each employee and collaborator must keep this material and perform it proper maintenance, keep it and use it with normal care and diligence.

The above highlighted also includes company vehicles (cars,vans, etc.).

Some garments for the execution of the work are provided by the Company. The same is also required to supply the necessary equipment and materials. In the event of termination of employment relationship, the clothes, uniforms, tools and tools provided will have to be returned to the employer.

3.6 *Hygiene and safety in the workplace*

The Company has always complied with the regulations concerning accident prevention and safety in the workplace. Compliance with the aforementioned provisions is required rules by all employees. In particular, production personnel are reminded mandatory use of Personal Protective Equipment (PPE) at the time delivered.

3.7 *Non-compliance with the regulations*

Failure to comply with the rules of this regulation or any other non-compliance duties on the part of employees and collaborators, and/or breach of the rules of the CCNL in force, will involve the application of the disciplinary measures foreseen by the CCNL applied and currently in force, the full text of which is available to the interested in the Management.

3.8 *Entry into force and references*

This regulation comes into effect from the delivery to employees e collaborators. Responsible for its application is Ing. Paolo Battestin.
