



AVIMATIC s.r.l. Code of Ethics

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Section 0 – Overview

0.1 Introduction

In conducting its business, AVIMATIC has always been committed to strong human values and sound principles, and is aware of the contribution its work makes to the development of the national economy and the growth of its country.

The company believes in the value of work and considers the legality, fairness, and transparency of its operations essential to achieving its economic and social objectives.

Therefore, this document expresses AVIMATIC's commitments and ethical responsibilities towards its customers and suppliers, its employees and collaborators, and the social environment in which the company operates.

These commitments and responsibilities are aimed at creating satisfaction for its customers and suppliers, value for its owners, and professional growth for its employees and collaborators, and inspire the company's internal and external activities and management.

Founded in 1968, AVIMATIC has been operating in the high-precision mechanical machining sector for over fifty years. The company was one of the first in the industry to certify its QMS according to ISO 9001; it is currently certified according to the EN 9100 standard, specific to the aeronautics, space, and defense markets. It has progressively integrated the environmental requirements requested by customers, adopting UNI EN ISO 14001 to improve environmental performance and prevent pollution.

0.2 Recipients

By adopting the Code of Ethics, the company aims to define moral values, clear rules, and procedures to be followed. The Code of Ethics is addressed to:

- Members of corporate bodies
- Employees (both temporary and permanent)
- Project collaborators
- External and internal consultants
- Suppliers of goods and services
- Commercial partners
- Visitors
- Any other person who may act in the name and on behalf of the company, whether directly or indirectly, permanently or temporarily, or those who establish relationships with the company and work to pursue its objectives.

The recipients of this Code of Ethics are required to understand its contents and comply with its precepts.

The Code of Ethics will be made available to them, as specified below.

The company's management, or its delegate, is responsible for the effective implementation of the Code of Ethics and its dissemination within and outside the organization.

Company employees, in addition to their inherent compliance with current regulations and the provisions of collective bargaining agreements—where applicable—undertake to adapt their work practices to the purposes and provisions of this Code of Ethics.

This applies both to intra-company relationships and to relationships with parties external to the company, particularly with public administrations and other public authorities.

An essential requirement of any fruitful collaboration with the company is compliance by other recipients with the principles and provisions contained in this Code of Ethics.

Accordingly, the company provides its stakeholders with a copy of this document when entering into contracts or agreements with other recipients.

0.3 Company Vision

In supporting the Company Vision, we expect all employees to conduct themselves ethically, promoting and implementing a corporate culture inspired by responsibility, fairness, and ethics in their daily activities. Our organization pays the utmost attention to the professional conduct of its directors, employees, partners, suppliers, and all those who work for the Company.

Section 1 – General Provisions

1.1 Scope of Application

The provisions of this Code of Ethics (Code) summarize the general obligations of correctness and loyalty that qualify the fulfillment of work performances and behavior in the workplace and are binding on the directors of AVIMATIC s.r.l., on its employees (including temporary employees) and on all persons (collaborators and consultants) linked to employment relationships with the company.

1.2 Information and Communication

AVIMATIC's communications are inspired by expectations of ethical behavior, the principles of transparency, responsible decisions, truthfulness, accuracy, and completeness of corporate information, both internally and externally, while ensuring adequate protection of confidential or proprietary information.

AVIMATIC and its recipients undertake to conduct their business in compliance with the ethical and moral principles contained in this Code.

AVIMATIC disseminates this Code to all recipients, recommending their compliance, and undertakes to update it in accordance with emerging needs.

1.3 Fairness and Lawfulness

Every operation and/or transaction must be legitimate, consistent, appropriate, documented, recorded, and verifiable.

Employees and those purchasing goods and/or services, including external consultants, on behalf of AVIMATIC must act in full compliance with the company's guiding principles.

Management and each corporate function/area are responsible for the correctness and consistency of their conduct in carrying out their respective activities, maintaining conduct compliant with the law, regardless of the context, activities, and locations in which they operate.

Sponsorship activities undertaken by the company must be directed to entities and/or organizations of proven reliability and ethical standards, capable of providing adequate guarantees regarding the proper allocation of the funds disbursed.

1.4 Conflict of Interest

In carrying out their activities and/or duties, Recipients shall pursue the objectives and general interests of AVIMATIC, avoiding any activity and/or situation of personal interest that could constitute a conflict between their individual interests and those of the company.

In particular, they are prohibited from engaging in behavior aimed at exploiting insider information held by the company for personal gain. Any behavior that competes with the company's activities or, in any case, is contrary to the company's objectives and principles is considered a "conflict of interest."

Any type of pressure, recommendation, or report that could harm AVIMATIC must be reported to the company.

1.5 Confidentiality

It is forbidden to spread false information, both inside and outside the company, regarding the company itself, its owners, employees, collaborators, consultants, and third parties working for it.

All company information must be managed through institutional channels, ensuring its protection in full compliance with professional secrecy and safeguards.

1.6 Local Engagement

The company promotes local development through strong connections with various stakeholders in its local communities. It therefore works within the local community to develop a rich and productive society capable of recognizing and enhancing its resources, existing skills and potential, and gender, cultural, and ethnic differences, promoting well-being, integration, and social development.

1.7 Rejection of Discrimination

In decisions that affect relationships with stakeholders (personnel management and work organization, supplier selection and management, relationships with the surrounding community and its representative institutions), our organization avoids any discrimination based on the age, gender, sexuality, health status, race, nationality, political opinions, and religious beliefs of its stakeholders.

1.8 Quality

Quality is a hallmark of our company. The organization is committed and responsible for ensuring quality in every activity, consistent with its long-term strategy.

The company implements these activities through a set of processes managed through a quality management system that provides consistency, transparency, and service improvement to the outside world.

1.9 Ethics in the Aerospace Market

AVIMATIC ensures the management of behavior-based ethical risks by implementing standards appropriate for companies operating in the aerospace markets. This will be achieved through organizational structures and operating procedures that are continuously monitored and improved in accordance with the IAQG 9100 series.

1.10 Environmental Ethics

AVIMATIC recognizes the fundamental importance of adopting responsible environmental behavior and is committed to promoting a corporate culture focused on sustainability. With this in mind, one of its key environmental policies is the desire to prevent and reduce the impacts of production activities by adopting effective measures that minimize the ecological footprint and promote the conscious use of natural resources.

Compliance with all applicable environmental regulations is a priority: the company ensures that every production process and management decision is in line with current regulations, thus protecting both the local area and the community in which it operates. Furthermore, one of its strategic objectives is the continuous improvement of the company's environmental performance.

This translates into constant monitoring of results and the implementation of innovative projects that increase efficiency, reduce waste, and encourage eco-friendly solutions, in the belief that "those who sow respect, reap the future."

Section 2 – Business Conduct

2.1 Business Relationships

In conducting business relationships, AVIMATIC and its employees and collaborators, pursuing the company's best interests, must be guided by the principles of legality, fairness, transparency, and efficiency in their relationships with customers, suppliers, and the Public Administration.

Requesting or accepting any type of compensation or personal benefit related to the management of the company, either directly or through a third party, is prohibited.

Receiving and/or offering any object, service, or favor from or to Public Officials and Public Service Representatives or their relatives, including through a third party, as well as from customers, suppliers, and other parties, is prohibited, except in the case of gifts or other benefits of modest value.

Recipients carrying out activities on behalf of the company must ensure that the individuals with whom they conduct business have legitimate powers and must act in compliance with and within the limits of the powers of attorney or delegation granted to them.

2.2 Fair Competition

AVIMATIC is committed to fair competition and recognizes the same rights for other companies.

For this reason, the company establishes its own commercial policy independently and free from any agreement or collusion with competitors and establishes fair relationships with its customers and suppliers in compliance with the laws governing competition.

2.3 Relations with Customers

AVIMATIC recognizes that customer satisfaction is paramount to its business success.

It is therefore committed to providing, efficiently and courteously, in compliance with contractual terms, high-quality products that meet customer expectations, providing them with accurate and correct information about its work.

The company adheres to truthfulness in advertising and other communications.

2.4 Relations with Suppliers

The selection of suppliers of goods and services and the determination of the resulting contractual terms must be based on an objective assessment of the quality and price of the goods and/or services, as well as the guarantees of assistance and timeliness, and in any case always with a view to customer satisfaction and in accordance with the regulations and principles of this Code of Ethics.

AVIMATIC does not preclude any company, meeting the required requirements, from establishing supply relationships with the company and is committed to maintaining an open and frank dialogue with its suppliers in line with commercial practices.

2.5 Relations with Institutions

AVIMATIC and its employees and collaborators must maintain relationships with the Public Administration (local, national, European, and international) and its representatives (Public Officials) in compliance with applicable laws and based on the general principles of fairness and loyalty.

The company undertakes to avoid situations of clear conflict of interest in its relationships with the Public Administration.

In the event of access to or requests for funding, contributions, or subsidies from the State, the European Community, or other public bodies, the company undertakes to scrupulously comply with applicable laws and not to allocate the funds granted for purposes other than those for which they were granted.

Section 3 – Health, Safety and Environment

3.1 Environmental Protection

AVIMATIC, in conducting its business, recognizes its responsibility to the environment that goes beyond legal and regulatory requirements.

It is therefore committed to reducing its environmental impact and continuously improving its environmental performance as an integral part of its corporate strategy and operational methods.

In light of the above, AVIMATIC is committed to:

- Acting in compliance with current regulations, applying the best possible technologies
- Promoting the use of renewable energy sources and energy efficiency
- Reducing internal paper consumption by favoring the purchase of recycled and recyclable products
- Reducing the need for travel, where not strictly necessary, by promoting the use of alternative communication solutions such as telephone, email, and videoconferencing
- Encouraging and planning the development of its activities aimed at optimizing the use of natural resources and preserving the environment for future generations
- Promoting the regeneration of resources, including through circular economy initiatives
- Improving the environmental and landscape impact of its activities and preventing risks to the population and the surrounding environment
- Optimizing processes to reduce their impact on the environment
- Constructively contributing to the protection of local and national communities by supporting initiatives of cultural and social value in order to achieve improvement of one's reputation and legitimacy to operate

3.2 Workplace Health and Safety

AVIMATIC, considering its staff and human resources to be the company's most important asset, promotes a culture of health and safety in the workplace.

In strict compliance with current accident prevention regulations, the company works to prevent accidents and occupational diseases by adopting prevention-focused safety management systems, encouraging the spread of a strong culture of workplace safety throughout the company, and providing its employees and collaborators, at all levels, with adequate training, general and specific information, and all support necessary to work in healthy and safe conditions.

AVIMATIC ensures that risk assessments are performed and appropriate corrective measures are adopted to avoid risks to health, human safety, and the company's operations.

AVIMATIC ensures that its machinery, processes, systems, practices, and work environment are constantly improved to optimize safety and accident prevention performance.

With a view to fully disseminating a culture of health and safety, AVIMATIC considers accident prevention and workplace health to be an essential element in the selection of its suppliers.

Section 4 – Internal Policies

4.1 Labor Policies and Equal Opportunities

AVIMATIC offers all workers equal opportunities so that everyone can enjoy fair treatment based on merit.

The identification and selection of personnel must be based on an assessment of the candidate's specific skills, professional profile, and technical, psychological, and attitudinal abilities, which meet the company's needs and requirements. All information acquired during this process must be strictly related to the requirements.

AVIMATIC adopts and promotes actions aimed at excluding any discriminatory behavior based on race, gender, political, religious, or trade union affiliation, age, health, nationality, sexual orientation, and, in general, any personal characteristic.

AVIMATIC also ensures working conditions that comply with the rules of good manners, ensuring that no incidents of intimidation, mobbing, or stalking occur in the workplace.

The company governs its employment relationships with its employees and collaborators in full compliance with applicable legislation, incorporating any updates.

4.2 Environmental Policies

AVIMATIC's environmental policies are based on a series of general principles that guide the company's operations towards sustainability, responsibility, and compliance with applicable regulations. First and foremost, AVIMATIC is scrupulously committed to complying with all national, regional, and local environmental laws, regulations, and standards, ensuring compliance with permit requirements relating to emissions, waste, water, and environmental safety. The company promotes efficient resource management, aiming to reduce environmental impacts. Concrete actions include reducing energy consumption through the adoption of efficient technologies, optimizing the use of water, oils, coolants, and raw materials, and promoting reuse and regeneration wherever possible. These virtuous practices aim not only at sustainability, but also at cost containment and innovation in production processes.

Pollution prevention is a fundamental pillar of our environmental policy: AVIMATIC constantly monitors atmospheric emissions from metalworking processes and manages used oils, shavings, and cutting fluids in a proper and traceable manner. Specific procedures and containment systems are also adopted to prevent accidental spills, thus reducing risks to the environment and human health.

Another key aspect is sustainable waste management. The company practices separate waste collection and safe storage of hazardous waste, prioritizing recovery and recycling over disposal. AVIMATIC periodically audits authorized disposal suppliers, ensuring transparency and safety throughout the entire supply chain.

Regarding safety, health, and the environment, AVIMATIC ensures healthy work environments by reducing exposure to potentially harmful substances and agents, maintaining efficient extraction and filtration systems, and continuously training staff on correct environmental and safety procedures. All employees and contractors are required to behave in an environmentally friendly manner and strictly follow internal procedures. They are required to report any anomalies, risks, or unlawful behavior, thus contributing to a corporate culture based on collective responsibility.

AVIMATIC also actively engages suppliers and partners, requiring them to comply with environmental regulations, adopt eco-responsible practices, and ensure the traceability of materials and waste. The company favors those who demonstrate a commitment to sustainability, thus fostering a supply chain focused on shared values.

Finally, continuous improvement is a constant goal: AVIMATIC regularly monitors environmental indicators, is committed to progressively reducing the impact of its operations, and invests in increasingly sustainable technologies and processes. Communication and transparency are guaranteed both internally and externally, through clear disclosure of environmental policies and collaboration with public bodies, authorities, and local communities.

In summary, AVIMATIC adopts a proactive and integrated approach to environmental protection, focused on prevention, efficiency, stakeholder engagement, and continuous improvement, in compliance with the law and the highest standards of social responsibility. AVIMATIC confirms its commitment to operating responsibly, sustainably, and transparently, contributing to the protection of the Bagnolo Cremasco area and the quality of life of future generations.

4.3 Harassment in the Workplace

AVIMATIC strives to ensure that internal and external working relationships do not give rise to harassment that leads to the creation of an intimidating, hostile, or isolating working environment for individuals or groups of workers, or that hinders the individual prospects of others for mere reasons of personal competitiveness.

4.4 Child Labor

AVIMATIC is committed to combating all forms of labor exploitation, particularly child labor.

For this reason, the company is committed to respecting collective bargaining agreements and all legal provisions to ensure compliance with applicable regulations regarding the employment of minors and young people in the company.

Similarly, AVIMATIC is also committed to combating the use of low-cost labor, often referred to as "gangmastering."

4.5 Diversity & Inclusion

Diversity is a key value that must be protected and encouraged within a company through understanding, inclusion, and valorization of its people's differences, with the aim of creating wealth and new ideas.

Therefore, AVIMATIC is committed to:

- valuing gender balance and overcoming any stereotype, discrimination, or prejudice based on an individual's sex and sexual orientation
- recognizing equal opportunities for all people, regardless of sensory, cognitive, and motor disabilities
- promoting an intercultural and open vision, based on organizational and social cooperation

4.6 Accounting Control and Transparency

AVIMATIC condemns any conduct, by anyone, aimed at altering the clarity, accuracy, and truthfulness of the data and information contained in the financial statements, reports, or other corporate communications required by law, addressed to shareholders or the public.

Any type of corporate transaction or behavior that could cause unfair damage to creditors or harm the integrity of the company's assets is also prohibited.

The company requires that its directors, employees, and collaborators, within the scope of their specific responsibilities, conduct themselves correctly and transparently, providing truthful and accurate information in response to legitimate requests from shareholders and corporate bodies, as well as during audits and inspections by the competent public authorities.

Section 5 – Supervisory Body

5.1 Responsibilities

AVIMATIC's owners, represented by its shareholders, are responsible for monitoring, ensuring the operation and compliance with the organizational processes and principles contained in the Code of Ethics, for their ongoing updating and ensuring their dissemination to employees, collaborators, customers, suppliers, and, in general, all interested third parties.

All parties involved in the company's activities are required to provide their full cooperation to ensure the full implementation of the provisions of this Code.

Section 6 - Dissemination

6.1 Implementation Provisions

This Code must be brought to the attention of the company's members, employees, and collaborators (to whom a paper copy must be delivered), and to all those who may act on behalf of the company. It is published on the AVIMATIC website so that it can also be accessed by all recipients.

Section 7 – Conclusions

7.1 Compliance and Amendments

Shareholders, employees, collaborators, and any party having business relationships with the company are required to conform to the company values, while also realizing the company vision, and to comply with all applicable regulations.

If in doubt, please ask.

Any modifications must be approved by AVIMATIC's management.