OUR BUSINESS CODE OF ETHICS

Lucchi R. S.r.l.
Via Togliatti, 3 , Viserba di Rimini, 47922
Tel. 0541-739211 - Fax. 0541-739202
Mail: m.mezzorecchia@lucchirimini.com
Web: http://www.lucchirimini.com

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1. THE COMPANY

Lucchi R. is a limited liability company that operates in the electromechanical sector, in particular in the electric motor market. With its consolidated technical experience, Lucchi R. is a reference for the design, development and production of electric motors, offering complete support to its clients in the international arena.

2. FOREWORD

The Code of Ethics is the document of moral rights and duties that defines the ethical and social responsibility of the Lucchi R. Srl company; it is aligned with the provisions of Legislative Decree No. 231 of 8 June 2001, and aims to prevent illegal or irresponsible conduct by those who operate in the name and/or on behalf of the Company, and defines the responsibilities of each company subject towards all parties involved in the company's activities, i.e. customers, suppliers, partners, employees, collaborators, public institutions and anyone else interested in the company's activities. The recipients of this Code of Ethics are required to fully comply with the principles and values contained therein, as well as to protect the image and respectability of the company, and to preserve the integrity of its human, social and economic assets.

Through this Code of Ethics, Lucchi R. Srl intends to present itself in the Market as a company bearer of morally high values such as compliance with the law, respect for workers and the environment, fair competition, faithful to the principles and values of democracy, equality, solidarity.

3. GENERAL PRINCIPLES

3.1 RECIPIENTS OF THE CODE OF ETHICS

All recipients of this Code of Ethics are required to know its content and to observe the principles contained therein. Company employees, in addition to compliance with current regulations and the provisions of collective bargaining, undertake, within the scope of their activities and functions, to comply with their responsibilities inside and outside the company, operating with a view to cohesion, collaboration and trust, in compliance with laws and regulations in force, in any situation and context; they undertake to comply with this Code of Ethics, to contribute to its application and to report any deficiencies or violations. Management must comply with it in proposing and implementing projects, investments and actions useful for increasing the economic value of the company and the well-being of employees, customers and suppliers.

3.2 DIFFUSION OF THE CODE OF ETHICS

The Management of Lucchi R. Srl undertakes to disseminate the Code of Ethics inside and outside the organization and to scrupulously monitor its observance to ensure the transparency of the actions and behaviors carried out and, if necessary, to intervene with corrective actions. Employees are required to promptly report violations of the Code of Ethics so that the Management can prepare all the necessary actions to protect and restore compliance with rules and laws.

3.3 FUNDAMENTAL RIGHTS

Lucchi R. Srl operates respecting the fundamental rights of every individual, protecting their moral integrity and ensuring equal opportunities. Internally, the Company promotes a serene work environment, in which everyone can work in compliance with the laws, principles and shared values; the Company does not tolerate any form of isolation, exploitation, harassment or discrimination, for personal or work reasons. Any type of discrimination based on diversity of race, language, color, faith and religion, political affiliation, nationality, ethnicity, age, sex and sexual orientation, marital status, disability and physical appearance, economic and social condition is expressly prohibited.

3.4 VALUE OF HUMAN RESOURCES

Lucchi R. Srl recognizes that employees and collaborators are an indispensable factor for the success of the company; for this reason it promotes their enhancement, autonomy and involvement in business decisions; moreover, through the preparation of programs and refresher courses, it is committed to increasing individual and group skills, testifying to the conviction that professional growth and individual contribution, in an environment characterized by team spirit and a sense of belonging, are fundamental elements for business development.

4. CRITERIA OF CONDUCT

4.1 MANAGEMENT COMMITMENTS

The Management of Lucchi R. Srl, in the awareness of its responsibilities, is inspired by the principles contained in this Code of Ethics, and undertakes to orient its activity to values of honesty, integrity in the pursuit of corporate objectives, loyalty, fairness, respect for people and rules, mutual collaboration. In particular, the directors undertake to lead the company responsibly, establishing relationships with their collaborators based on mutual respect and fruitful cooperation, favoring the development of the spirit of belonging to Lucchi R. Srl.

Lucchi R. Srl also considers employee motivation to be fundamental; therefore, it is committed to implementing and maintaining the flow of information that is correct, valid and motivating, so as to make employees aware of the importance of everyone's role in the company.

More precisely, Lucchi R. Srl undertakes:

- To ensure the dissemination of the Code of Ethics among employees and external collaborators;
- To provide any possible clarification regarding the interpretation and implementation of the rules of the Code of Ethics, in particular with regard to its application in company procedures;
- To carry out checks on any notice of violation of the Code of Ethics and, in the event of violation, to adopt appropriate sanctions;
- To adopt all safety measures and to ensure that the physical integrity and moral personality of workers is always guaranteed.

Lucchi R. Srl also guarantees the protection and safety in the workplace for its staff and third parties, committing itself to compliance with the legislation on safety at work and to promoting the safety of all the places that make up the work environment itself, even beyond the express obligations of the law.

Lucchi R. Srl ensures the protection of the principle of equal opportunities and manages career advancement and remuneration on this basis, in a continuous and balanced comparison with the reference market, committing itself to ensuring transparency, seriousness, fairness and clarity on the evaluation methods applied.
Lucchi R. Srl is committed to operating in respect of the environment, implementing behaviors aimed at promoting the culture of respect for the environment and the prevention of waste among all those connected to the company, and always operating in compliance with the laws in force.

4.2 EMPLOYEE DUTIES

Beyond the legal and contractual obligations regarding the duties of workers, employees are required to be professional, honest, dedicated, loyal, collaborative and mutually respectful. In addition, the spirit of Lucchi R. Srl provides for the participation of each employee in the company's activities with enthusiasm, desire to increase their skills and awareness that the professional contribution given by each employee is the main key to the success of Lucchi R. Srl.
All employees are guaranteed the same opportunities to express their professional potential. In particular, each employee must:
- Refrain from conduct contrary to the rules indicated in this Code of Ethics;
- Promptly report any information regarding possible violations to management;
- Conduct oneself inspired by the utmost transparency, fairness and legitimacy, providing one's activity with commitment and professional rigor, providing an adequate contribution to the responsibilities assigned and acting in such a way as to protect the prestige and good name of the company.
- To be as efficient as possible in their work, whatever the level of responsibility deriving from their role, following the instructions given by higher hierarchical levels.
- Contribute with their colleagues and superiors to the achievement of common goals.

Relations between employees are based on the utmost mutual respect, fairness and collaboration and civil coexistence. The employees and external collaborators of Lucchi R. Srl are required to a constant commitment to share the skills acquired, and to continuously improve them, on the basis of personal will and through the tools offered by the company.
Lucchi R. Srl promotes the continuous improvement of each employee, teamwork and the spirit of collaboration and belonging, paying particular attention to time management and decision-making skills; it therefore aims to achieve excellence starting from the individual level to the corporate level.
With regard to third parties, each company employee, according to his or her skills and activities, is required to inform about the rules and principles contained in this Code of Ethics, to demand compliance with and application of them and, in the event of non-compliance, to inform the Management.

4.3 USE OF COMPANY VEHICLES AND EQUIPMENT

Each employee is required to use the company's infrastructures, means, tools and materials with the utmost respect; it is strictly forbidden for employees to use the company's equipment for private purposes or interests or in competition with the company's activities; any non-compliant use of the company's equipment must be promptly reported to the Management.

Company vehicles and equipment means premises, furnishings, tools, company vehicles, computers, servers, photocopiers, printers, telephone, fax, stationery and the like, and all the functions of the company IT system (databases, software, internet, e-mail and the like). The use of company vehicles, equipment and materials is allowed to employees outside the company only for reasons related to company activities such as business trips, smart working and the like. Other uses must be expressly authorized by the Management.

4.4 CONFLICT OF INTEREST

In order to avoid the onset of conflict of interest, any activity performed by the employees of Lucchi R. Srl must be carried out in a transparent, correct and lawful manner exclusively in the interest of the company. Employees must operate avoiding all situations in which there may be a conflict with the interests of the company or that may cause a lack of serenity in taking impartial decisions, against the interests of the company and in conflict with the rules and principles of this Code of Ethics. Employees must avoid a conflict of interest between the activities arising from their corporate function and personal or family economic interests. If a situation of conflict of interest is identified, appropriate reporting must be made promptly to the Management.
In particular, the following cases are considered to be situations that give rise to a conflict of interest:

- Economic interests of the employee or his family members in competition or contrast with those of the company;
- Work activities of any kind carried out at Customers, suppliers or competitors of the company;
- Acceptance of economic benefits, advantages or utilities of any kind, coming from customers, suppliers or competitors of the company.

Since the above list is purely illustrative but not exhaustive, any situation that may jeopardize the impartiality and serenity in the implementation of actions or decisions of employees, regardless of their function and duties, or in case of doubts about the onset of such situations, must be reported to the Management for clarification, and involves abstention from carrying out actions required by such situation.

4.5 CONFIDENTIALITY

Each employee is obliged to observe the strictest and absolute confidentiality on all information relating to the company, its employees, its organization, production methods and all information of which he or she may be aware by virtue of his or her function and work activity.
The disclosure of any information pertaining to the company and/or the disclosure of which may cause damage to the company is strictly prohibited.
In particular, the employee must:

- Process the information necessary for its activity for the purpose for which it is called upon to use it in relation to its function;
- To process and communicate information exclusively within the procedures envisaged;
- To store information so that it is not acquired by unauthorized parties;
- Verify that there are no constraints of any kind on the part of information relating to third parties connected to the company's activities; if such constraints exist, obtain consent to the processing of such information from the data subjects;

4.6 COMPORTAMENTO PROFESSIONALE

Lucchi Srl bases its business on the principles of loyalty, fairness, efficiency and fair competition.

All employees and collaborators of the company who operate, even indirectly, on behalf of Lucchi R. Srl, must comply with correct and respectful professional behavior in relations with customers, regardless of the deal handled.

It is not permitted to offer or promise to offer money, gifts or benefits of any kind to employees or family members of customers' employees, except for gifts of modest value (less than € 100.00) or of utility of use, the expense of which must be specifically authorized by the Management, carefully documented, identified and treated appropriately for tax purposes and for any internal audit.

The Management must be promptly informed in the event that any gift or gift from third parties is unduly offered or delivered. If an employee receives Christmas gifts or gifts referable to mere commercial courtesy, he or she is required to inform the Management, which will evaluate their possible acceptance.

Each employee must carry out his or her work tasks with professionalism, reliability, precision, education and courtesy; it is strongly recommended to document the work done and verify one's work to encourage the exchange of information as detailed as possible between colleagues.

The working environment must be constructive and aimed at mutual cooperation, with full sharing of the knowledge and skills acquired, stimulating the growth and training of individuals and the group.

If you find yourself in difficulty in carrying out the assigned task, promptly inform the Management to arrange support or, possibly, replacement.

You should never agree to carry out a task for which you do not possess appropriate qualifications.

The way of operating must always be honest and transparent, both in compliance with the principles of this Code of Ethics and in the interest of the Client.

4.7 FREE COMPETITION

All employees of Lucchi R. Srl, while directing their work towards the achievement of the best results, are required to act in compliance with the regulations in force regarding free competition, and in accordance with the principles of this Code of Ethics.

It is absolutely forbidden to establish exchanges of information, understandings or agreements, direct or indirect, with any competitor regarding negotiations, prices, discounts, economic conditions and the like, contrary to free competition.

If a situation of doubt arises in this regard, the Management must be promptly informed in order to act in full transparency and in compliance with the rules.

4.8 SUPPLIER RELATIONS

Lucchi R. Srl selects its suppliers operating with the utmost transparency and seriousness, evaluating their quality, reliability, efficiency and cost-effectiveness. The purchasing processes are based on compliance with the principles and rules of free competition. Relations with suppliers of any kind must be managed with the utmost seriousness and impartiality; employees who, by reason of their function or assigned tasks, have relations with the suppliers of Lucchi R. Srl must:

- Select and manage suppliers following internal procedures;
- Maintain a close and assiduous collaboration in order to ensure quality, compliance with deliveries, cost control, in order to meet the needs of the company and the end customer;
- Respect and enforce contractual conditions, establishing a relationship of trust such as to allow open dialogue and prompt support, in line with good commercial practices;
- Promptly inform the Management in the event of problems that may affect the reliability of the supplier, so that action can be taken to avoid or limit any consequences;

4.9 CLIENT RELATIONS

Lucchi R. Srl places the Client at the center of its activity, committing itself to ensuring the highest quality of product and service, through the constant improvement and monitoring of its professional activity. All commitments and obligations made with the Client must be respected with the utmost punctuality, precision and dedication, regardless of their extent. The criteria of conduct must be based on professionalism, availability and courtesy. All employees must comply with the following indications:
- Follow internal procedures for client management;
- Provide precise and accurate information about the products offered, in order to generate an informed decision in the Client;
- Advise the Client, if necessary, operating in his exclusive interest and with maximum transparency;
- Adhere to truth and clarity in all communications;

4.10 RELATIONS WITH PUBLIC INSTITUTIONS

Employees who, by virtue of their duties, have the task of requesting, managing and administering funding, contributions and/or subsidies from the Public Administration, public bodies or the like, are required to ensure, within the limits of their functions, that the aforementioned relationships are intended exclusively for the purpose for which they were requested, and to maintain clear and accurate documentation of each operation and movement of funds.

4.11 DISCLOSURE OF INFORMATION TO THE OUTSIDE WORLD

All information disclosed outside Lucchi R. Srl must be truthful, clear and transparent. Any relations with the media are reserved for the Management. Employees must refrain from providing information, opinions or statements on behalf of the Company.
Any communications may be issued by the Management or previously authorized and delegated to those responsible by the Management.
The information provided in public speeches, conferences, seminars, or contained in articles or publications in general must be agreed in advance with the Management and must comply with the guidelines approved by the Management, following the principles of correctness, honesty and transparency of this Code of Ethics.
The disclosure of information about projects, investments, negotiations, initiatives in general involving Lucchi R. Srl by all recipients of this Code of Ethics is not permitted.
It is expressly forbidden to disclose untrue, misleading or deceptive information.
It is absolutely not permitted to promise gifts or other benefits for the purpose of influencing the activities of the organs in any way.

All employees and external collaborators of Lucchi R. srl are called upon to convey to the outside world a corporate image in keeping with the reputation and prestige it has achieved during the years of activity.

4.12 INTERNAL CONTROL

Lucchi R. Srl pursues a policy of dissemination and awareness of the importance of internal controls, with the aim of ensuring the efficiency and effectiveness of its activities at all levels, the protection of company resources and assets, compliance with laws, procedures and regulations.

All employees, within the scope of their functions and activities, have the obligation and responsibility to establish, maintain and monitor the efficiency and operation of the internal control system.

4.13 ACCOUNTING TRANSPARENCY

Every action and operation must be correctly authorized, recorded, legitimate and consistent. All actions and operations must be supported by accurate documentation to allow correct accounting record, precise and easy reconstruction of the decision, approval and execution process.

Each employee is required to support the recording of transactions promptly and clearly, and to ensure that the documentation relating to their activities is easily traceable and verifiable.

The documentation relating to actions and operations must be systematically archived according to logical criteria, which allow them to be completely reconstructed both to identify responsibilities and in order to avoid interpretative errors.

To support this purpose, where provided, in addition to the paper support, an electronic archive managed by a special document software can be used in order to speed up the reconstruction of the accounting framework.

The use of company funds for illegal or improper purposes is strictly prohibited.

No one and for no reason shall be paid unauthorized payments or illegal forms of remuneration.

Any negligence, omission or falsification of which employees become aware must be promptly reported to management.

4.14 CONFIDENTIALITY OF SENSITIVE DATA

Lucchi R. Srl, in the exercise of its activity, collects confidential data; therefore, the Company undertakes to comply with current regulations on Privacy. The use of the data collected for purposes other than those for which they were communicated is absolutely prohibited, except in the case of express authorization. In any case, the data and information acquired are processed with automated tools for the time strictly necessary to achieve the purposes for which they were collected.

The protection of data and information are contained or stored in computer supports and must be ensured by the adoption of security measures suitable for the purpose.

5. SPECIAL NORMS: IMPLEMENTATION AND CONTROL OF THE CODE OF ETHICS

5.1 VIOLATION OF THE CODE OF ETHICS – DISCIPLINARY MEASURES

Employees and external collaborators are required to comply with this Code of Ethics in all its parts.

Compliance with the rules of this Code of Ethics is an essential part of the contractual obligations of the employees of Lucchi Srl, pursuant to and for the purposes of art. 2104 of the Italian Civil Code, as well as for the Company's consultants and collaborators, with reference to existing contractual relationships.

Therefore, the violation of the provisions of this Code of Ethics by the workers (employees, consultants and collaborators) constitutes a breach of contractual obligations and may result, as the case may be, in the application of sanctions and disciplinary measures provided for by the applicable Collective Agreements.

Everyone is required to promptly report to the Management any conduct that does not comply with the principles of this Code of Ethics put in place by each Recipient. Whistleblowers in good faith must be guaranteed against any form of retaliation, discrimination, penalization and, in any case, the confidentiality of the identity of the whistleblower will be ensured, without prejudice to legal obligations and the protection of the rights of the Company or of persons wrongly accused or in bad faith.

Lucchi R. Srl will take appropriate measures against those whose actions have resulted in violation of this Code of Ethics.

Disciplinary measures may include, at the sole discretion of Lucchi R. Srl, verbal or written warning, suspension or immediate termination of the employment or business relationship, or any other disciplinary measure deemed appropriate in the circumstances. Certain violations of this Code of Ethics may also be prosecuted civilly or criminally by administrative or other authorities.