



Direzione Uffici e Stabilimento:
20002 OSSONA (MI) – Via F.lli Cervi, 2
Tel. 02/9010146 – 90297050 – Fax 02/90296642
Email: info@samicmix.net
Sito internet: www.samicmix.net
Posta Certif. pec@pec.samicmix.net
Codice SDI M5UXCR1
Cap. Soc. Euro 10.400.00= i.v.
REA 658966 C.F. e P.I. : IT 01546330158

CODE OF ETHICS

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1. INTRODUCTION

Samic Srl, in order to clearly and transparently define the set of values that inspire the achievement of its objectives, has adopted this Code of Ethics. Compliance with this Code is mandatory to ensure the proper functioning, reliability, reputation, and image of the Company.

All Company activities must therefore comply with the principles set forth in this Code of Ethics.

Samic Srl acknowledges the importance of ethical and social responsibility in the conduct of its business activities and is committed to respecting its own interests as well as those of its stakeholders (employees, customers, suppliers, institutions) and the community in which it operates.

At the same time, all employees and all parties cooperating with the Company are required to comply with Company rules and with the provisions set out in this Code.

No exceptions to the rules contained herein are permitted; any such conduct is considered incompatible with Company values.

2. MISSION AND ETHICAL VISION

The mission of Samic Srl is to manufacture high-quality electric agitator units, aiming to strengthen its position as a leading, competitive, and reliable company in the industry.

Samic Srl seeks to maintain and develop a relationship of trust with its stakeholders and to achieve its objectives in full compliance with applicable laws and the principles of honesty, impartiality, reliability, loyalty, fairness, transparency, and good faith.

3. THE CODE OF ETHICS

Samic Srl has deemed it appropriate and necessary to adopt its own Code of Conduct, which defines the rights, duties, and responsibilities assigned to all those operating within the Company and, more generally, to all stakeholders.

This Code represents the instrument outlining the general guidelines for the proper conduct of all Company activities.

4. SCOPE OF APPLICATION

The provisions of this Code apply, without exception, to the following stakeholders, wherever the Company operates worldwide:

- Members of the Board of Directors
- Employees
- Contractual counterparties (external collaborators, consultants, suppliers, customers, etc.)

Samic Srl requires all stakeholders to fully comply with the behaviors, principles, and values set out in this Code, acting with honesty, impartiality, fairness, transparency, and good faith.

The objective is to create sustainable value and to demonstrate the Company's responsibility to its customers, employees, and partners.

Key principles include:

- Full compliance with all applicable laws and regulations
- Fairness, loyalty, transparency, efficiency, and openness in business relations and dealings with Public Authorities
- Full cooperation with Public Authorities
- Moral integrity
- Professional diligence and commitment
- Respect and dignity in all interpersonal relationships
- Rejection of any form of discrimination, harassment, or intimidation
- Enhancement of professional skills
- Commitment to compliance with and continuous improvement of the Code

Furthermore, stakeholders must:

- Avoid conflicts of interest
- Refrain from accepting gifts or payments not legally due from any party seeking to conduct business with Samic Srl

The Company undertakes to disseminate the Code to ensure full awareness of its provisions.



5. PRINCIPLES AND REFERENCE STANDARDS

1. **Legality**

The Company considers compliance with applicable laws and regulations as a fundamental requirement.

2. **Honesty and Fairness**

Relationships must be based on honesty and fairness, which are core principles of business management.

3. **Centrality of the Individual**

The Company promotes respect for physical and cultural integrity and ensures safe working conditions. Any request or threat to act against the Code is not tolerated.

4. **Impartiality and Equal Opportunities**

The Company undertakes to adopt clear policies through this Code of Ethics and internal regulations expressly prohibiting any form of discrimination based on race, gender, color, religion, age, political or trade union affiliation, sexual orientation, disability, harassment, or any other protected characteristic. Such policies also define the applicable disciplinary measures, which may range from warnings to dismissal in the most serious cases.

The Company is committed to promoting an inclusive work environment that ensures equal opportunities and values diversity.

In order to ensure the effectiveness of these policies, secure and confidential reporting channels have been established, including anonymous surveys aimed at ensuring continuous monitoring to support equity and impartiality.

An integrated approach combining prevention, protection, enforcement, and support is essential to effectively prevent discrimination and harassment and to foster fair, safe, and inclusive working and living environments.

5. **Working Conditions**

Working conditions represent a fundamental element for employee well-being and overall, Company productivity.

Remuneration: The Company is committed to ensuring fair and equitable compensation, so that employees performing the same role with equivalent skills and responsibilities receive equal pay, without discrimination.

Working hours: Compliance with contractual provisions and applicable laws is essential to ensure that working time limits are respected and the right to rest is safeguarded. Flexible working arrangements may be granted to meet

specific personal needs. Adequate breaks, leave, and vacation periods must be ensured.

Benefits and welfare: In addition to salary, the Company provides tangible benefits such as meal vouchers and fuel vouchers, representing concrete support to employees' income.

6. **Environmental Policies**

The Company acknowledges its responsibility towards the environment and climate and has therefore established policies and implemented concrete actions aimed at improving energy efficiency and reducing greenhouse gas emissions.

Environmental sustainability is no longer merely a regulatory requirement but represents an ethical and strategic commitment guiding business decisions and supporting long-term growth.

Improvement initiatives have been launched, including the replacement of obsolete equipment and the adoption of LED lighting systems.

7. **Transparency of Information**

The Company is committed to providing clear, accurate, and transparent information to all stakeholders.

8. **Proper Use of Company Resources**

All members of the organization are required to comply with the instructions provided for the use of Company resources assigned to them and are responsible for their integrity and proper functioning.

Any malfunction, damage, or risk of damage to Company resources must be promptly reported to the relevant responsible parties in accordance with the Company's organizational structure.

9. **Confidentiality of Information**

The Company ensures the confidentiality of the information in its possession and compliance with applicable data protection laws.

All information is processed in accordance with confidentiality and privacy requirements.

Employees are required to:

- collect and process only the data necessary for the performance of their duties
- store such data in a manner that prevents unauthorized access by third parties

10. Protection of Trade Secrets and Intellectual Property

While operating with the utmost transparency towards stakeholders, all economic, technical, or other information acquired by employees in the course of their duties, or by other Recipients of this Code, shall be considered Company property and an integral part of its intangible assets essential for value creation.

Employees, Recipients, and consultants must exercise the utmost care in handling such confidential information.

The disclosure of such information to external third parties is strictly prohibited.

11. Human Resources

Human resources represent a fundamental asset and a critical factor for the Company's success in the marketplace.

The management of employment and collaboration relationships, in compliance with the principles of honesty, impartiality, fairness, professionalism, and technical competence, is based on respect for employees' rights and the full enhancement of their contribution to growth and development.

The Company undertakes to comply with all applicable contractual and legal requirements and to promote responsible behavior among employees and collaborators.

Employees are required to act in accordance with the following values:

- *Professionalism*: knowledge of both technical and managerial aspects
- *Availability*: willingness to learn and collaborate
- *Responsibility*: commitment to achieving results through one's work
- *Quality of work*: performing duties professionally and effectively, in compliance with Company procedures and ethical standards
- *Communication*: ability to communicate, listen, and seek information to enhance professional development, as well as openness to constructive feedback
- *Respect*: respect for superiors, colleagues, collaborators, and all stakeholders
- *Teamwork*: openness to collaboration and constructive dialogue to achieve common objectives
- *Flexibility*: adaptability in working methods
- *Customer focus*: commitment to meeting customer needs and expectations

12. Customers

Relations with customers shall be conducted with availability, respect, and courtesy, fostering a collaborative relationship based on high professional standards.

The Company is committed, in accordance with principles of impartiality, to providing high-quality products and services that meet customer expectations while ensuring safety and reliability.

13. Suppliers

Procurement processes are based on the pursuit of maximum competitive advantage, equal opportunities for all suppliers, fairness, and impartiality.

Supplier selection and purchasing conditions are determined based on objective evaluations of quality, price, and the ability to deliver adequate service levels.

Employees shall not:

- receive any form of compensation from any party in connection with the performance of their duties
- be subject to any form of undue influence from third parties in decision-making processes

Any employee receiving gifts or benefits not attributable to customary business courtesy must refuse them and promptly inform their superior.

14. Fairness in Contractual Relations

Employees responsible for managing contractual relationships are required to act in good faith and fairness towards counterparties, ensuring that contract negotiations and execution are free from improper or unlawful influence.

Compliance with Company procedures governing contractual approval processes is mandatory.

Contracts must also include obligations for third parties to comply with applicable laws and assume responsibility for any violations.

The Company must verify that contractual performance complies with agreed terms, and both parties must properly document and retain all relevant records to accurately reflect the nature and substance of the transactions.

Acceptance of such clauses shall constitute an essential condition for the Company's consent to enter into the relevant agreements.

15. Gifts and Benefits

Recipients are strictly prohibited, whether directly or indirectly, from offering or receiving any gifts or benefits that may even appear to exceed normal business or courtesy practices or that may be intended to obtain preferential treatment in any activity related to the Company.

In the event that a Recipient receives offers or requests for gifts or benefits—except for items of nominal value—they must immediately inform their line manager. The manager, possibly in consultation with the General Manager, shall assess the situation, determine appropriate actions, and evaluate any risk of non-compliance with applicable laws and the Company's organizational, management, and control model.

6. DISCIPLINARY PROVISIONS

Compliance with the Code of Ethics is an essential part of employees' contractual obligations.

Violations may result in disciplinary action, including termination of employment, and may entail liability for damages.

For external collaborators and business partners, compliance with the Code is also mandatory.

Any breach may result in contract termination and compensation for damages.

The Company undertakes to apply sanctions consistently, fairly, and proportionately to the violations committed.