Code of Ethics and Business Conduct

NE-MA Srl

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Management approval: Lorenzo Arrabito, Sole Director
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This Code sets out the principles that guide the activities of NE-MA, a manufacturer of pressure switches and non-return valves, and its relationships with customers, suppliers and people working with the company.

1 Scope and responsibilities

This Code applies to directors, employees and other personnel working with the company. NE-MA communicates its principles to suppliers and partners and requires compliance in activities performed for the company, in accordance with the applicable agreements. Management is responsible for approving, communicating and implementing the Code, with the support of the managers of the functions concerned.

Everyone must know the rules relevant to their role, seek clarification when in doubt and report conduct inconsistent with this Code. No commercial or production objective justifies improper conduct.

2 Compliance with the law and integrity

NE-MA requires compliance with applicable laws, signed agreements and company rules. Decisions must be made honestly, professionally and transparently. Fraud, misleading statements, concealment of relevant information and falsification of documents, records or inspection results are prohibited.

3 Customer relations

Quotations, order confirmations and communications must clearly describe product characteristics, commercial terms, quantities and agreed conditions. Commitments must be realistic in view of available capacity and information. Unsupported promises or statements of conformity must be avoided.

Customers must be informed promptly of issues that may affect the conformity of supplies or agreed deliveries. Complaints and technical enquiries are handled with care, traceability and a cooperative approach, identifying responsibilities and actions to resolve them.

4 Product quality and change management

Materials, processes and products must meet the specified requirements and controls. Altering test results, concealing defects or knowingly shipping non-conforming products without the applicable authorisations is prohibited. Test reports and declarations must be based on verifiable evidence.

Before changes to a product, process, material or production site are introduced, the responsible function assesses their effects. Changes that may affect agreed requirements are communicated to the customer in advance. Where customer approval is required, written consent must be obtained before proceeding. Operational implementation follows company procedures and agreements with the customer.

5 Relations with suppliers and external service providers

Suppliers are selected on the basis of quality, reliability, technical capability, commercial terms and fulfilment of commitments. Preferences motivated by personal gain are not permitted. Orders and requirements must be clear, and purchasing decisions must be documented to an extent appropriate to the supply concerned.

NE-MA requires its suppliers to act with integrity, respect workers and safe working conditions, and comply with applicable environmental requirements. Management assesses known issues and determines requests for clarification, improvement actions or other measures proportionate to the seriousness of the facts and consistent with existing agreements.

6 Bribery gifts and conflicts of interest

Offering, promising, requesting or receiving money, favours or other benefits to influence decisions or obtain improper treatment is prohibited in dealings with both private parties and public-sector representatives. Improper payments through intermediaries or consultants are not permitted.

Only occasional gifts and hospitality of modest value, consistent with normal business courtesies, are allowed, provided they do not compromise independent judgement and comply with the recipient’s rules. Cash and cash equivalents are prohibited. In case of doubt, Management must be consulted before a benefit is offered or accepted.

Personal, family or financial interests that may influence a business decision must be disclosed to Management. The person concerned must not take part in the decision until appropriate measures have been established. External assignments must correspond to actual services and justifiable fees.

7 People and working conditions

NE-MA respects human dignity and requires conduct based on respect and cooperation. Discrimination, harassment, intimidation, violence and degrading treatment are not tolerated. Assessment, allocation of duties and professional development are based on competence, ability and the requirements of the role.

Undeclared work, forced labour, exploitation and prohibited child labour are not permitted. Working hours, rest periods, remuneration and employment conditions must comply with applicable rules and agreements. Freedom of association and workers’ representation are respected.

8 Health and safety

Work must be organised to protect the health and safety of workers and other people on company premises. NE-MA undertakes to assess and reduce risks, maintain suitable equipment, and provide training and instructions appropriate to the assigned activities.

Personnel must follow instructions, use the required protective equipment and report dangerous conditions, faults and incidents. Removing or bypassing safeguards to speed up production is prohibited. When a hazard arises, the affected activity must be stopped and the responsible manager notified, in accordance with safety procedures.

9 Environment and resource use

NE-MA undertakes to conduct its activities in compliance with applicable environmental requirements and to reduce their impact through measures proportionate to its production processes. Materials, energy and water must be used carefully, avoiding waste.

Waste and substances used in operations must be managed in accordance with company instructions and entrusted to authorised operators where required. Leaks, spills and other irregularities must be reported promptly. Information on product composition and material compliance must be supported by reliable documentation.

10 Confidentiality company assets and competition

Drawings, samples, technical data, commercial terms and other confidential information belonging to customers, suppliers and the company may be used only for authorised purposes and disclosed only to those who need it for their work. The duty of confidentiality continues after the relationship ends, in accordance with applicable obligations.

Personal data is processed for legitimate purposes, with restricted access and appropriate safeguards. Equipment, documents and IT resources must be handled with care. Unauthorised access, unauthorised software and unlawful use are prohibited.

NE-MA operates in accordance with the principles of fair competition. Unlawful agreements with competitors on prices, customers, markets or tenders are prohibited. Third-party trademarks, patents, designs and other intellectual property rights must be respected.

11 Documentation and relations with authorities

Transactions must be recorded truthfully and supported by documents consistent with the services and supplies actually provided. Fictitious invoices, unjustified payments, altered documents and the knowing use of money or assets of unlawful origin are prohibited.

Dealings with authorities and public bodies are handled by designated personnel and must be conducted with integrity and transparency. Obstructing inspections, providing false information or using public grants for purposes other than those authorised is prohibited.

12 Reporting implementation and updates

Questions and suspected breaches may be reported to the relevant manager or directly to Management, including through a confidential written communication. Management provides a confidential contact point. If a report concerns the usual recipient, it should be addressed to another director who is not involved, where one is available. Reporting procedures provided by law remain unaffected.

Reports are assessed impartially and confidentially, protecting the people involved. Retaliation against anyone reporting in good faith is prohibited. Any reporting channels governed by specific legislation remain unaffected.

Management assesses breaches and takes proportionate measures in accordance with applicable employment and contractual rules. For suppliers and external service providers, the consequences are determined by existing agreements. The Code is communicated to personnel, made available to relevant partners and reviewed whenever updates are needed.

This document takes effect on the approval date stated on the first page.
Contact details for enquiries and confidential reports: ne-masrl@legalmail.it – p.arrabito@nema-spa.it