



# CODE OF ETICHES

The NIGREMA SRL commits to apply a code of ethics in the highest standards of conduct in relations with the interested parties:

- Retailers and customers - provide quality services and products at the right price
- Suppliers - cooperation relationship, ethical procedures in the selection of resources, negotiations and administration
- Community - social responsibility and compliance with all laws and regulations concerning employment, safety and environmental protection; involving of society and individuals in community activities.
- Shareholders - achievement of objectives in compliance with all applicable laws, caution in acquiring, using, protection and disposal of Company assets.
- Employees - fair treatment in payment, development, training, health and well-being; equal opportunities for all employees; safe and healthy work environment; respect for the privacy of the employee and individual dignity.

## CODE OF ETHICS PRINCIPLES

In order to encourage the highest standards of corporate ethical behavior (Code of Ethics), employees and administrators must first of all enforce the ethical principles and roles listed below in all circumstances;

- Honesty - in contact with customers, suppliers, communities, affiliated companies and employees
- Integrity - strictly conform to the Code of Ethics in the company's activities
- Respect - dignity, equity and equal opportunities
- Trust – teamwork, an open and sincere communication
- Responsibility - report actual or presumed violations regarding the Code of Ethics and standards of conduct without fear of retaliation
- Citizenship - compliance with all applicable laws and regulations
- Diversity - promoting a universal culture that respects differences and favors the achievement of the Company's objective to reflect the diversity of our market.

## BEHAVIOR STANDARDS

All employees and administrators must therefore comply with the following ethical code standards.

### **1 - Gifts, Payments and Favors**

Employees must not offer or accept gifts, payments or favors offered with the purpose of obtaining a reward or influencing a decision.

#### **NIGREMA S.r.l**

Registered Office / Sede Legale: Via Bassetti 18, 20027 Rescaldina (MI) Italy  
Operating Office / Sede Amministrativa: Via 2 Giugno 277, 21050 Gorla Maggiore (VA) – Italy  
Tel. +39 0331 64 43 61 – Fax +39 0331 36 56 34 – [info@nigrema.it](mailto:info@nigrema.it) - [www.nigrema.it](http://www.nigrema.it)

**Nigrema Srl**  
**Andrea Marchini**  
**Managing Director**





## **2 - Conflicts of interest**

Employees and directors must act in the interests of the SRL NIGREMA. Behaviors, actions or use of information in conflict with the interests of the Company are prohibited. Employees must therefore avoid financial, commercial or other relationships that may interfere with the interests of the Company or that may be in conflict with the performance of their duties.

## **3 - Relations with suppliers**

Employees and administrators who deal with purchases will first have to comply with purchasing policies and procedures. Neither purchasing personnel nor other employees should be authorized to make purchases of a personal nature through the purchasing structure of NIGREMA SRL. Purchase orders - only a small number of employees and directors may enter into agreements to buy or to make contracts on behalf of the NIGREMA SRL.

## **4 – Compliance with anti-trust laws and regulations**

Employees and administrators undertake to comply with all anti-trust laws and regulations.

## **5 – Compliance with competition laws and regulations**

Employees and administrators undertake to comply with European and national laws and regulations on Competition.

## **6 – Compliance with intellectual property legislation**

Employees and administrators undertake to comply with the laws relating to patents, copyrights, trademarks, trade secrets, etc. that protect the intellectual property rights of companies and individuals. Softwares protected by copyright and used by employees for the Company's activities may not be reproduced, with the exception of copies made for the purpose of back-up function, nor may they be reproduced for the employee's personal use. It is forbidden to use unauthorized software on computers owned or leased by NIGREMA SRL.

## **7 – Proprietary or confidential information**

Employees and administrators are prohibited from disclosing to external subjects, competitors or media, any present or planned information of a non-public nature, including information relating to commercial transactions, financial results, sales results, employees, status technology, or other confidential information. This is also valid for information regarding third parties, suppliers and other employees.

## **8 – Compliance with environmental legislation**

Employees and directors must comply with all environmental laws and regulations and with the Company's policies and procedures.

### **NIGREMA S.r.l**

Registered Office / Sede Legale: Via Bassetti 18, 20027 Rescaldina (MI) Italy  
Operating Office / Sede Amministrativa: Via 2 Giugno 277, 21050 Gorla Maggiore (VA) – Italy  
Tel. +39 0331 64 43 61 – Fax +39 0331 36 56 34 – [info@nigrema.it](mailto:info@nigrema.it) - [www.nigrema.it](http://www.nigrema.it)

V.A.T. & Tax Code / P.IVA e Codice Fiscale IT 13010520156  
Trade Register Number of Milan / N. Registro delle Imprese di Milano: 53723/2000  
R.E.A. Number / Numero R.E.A.: MI-1608756  
Share Capital / Capitale Sociale: € 10.400,00 Fully Paid / Interamente Versati

**Nigrema Srl**  
**Andrea Marchini**  
Managing Director



### **9– Safety in the workplace**

Employees and administrators must comply with all laws and regulations concerning employment, safety and health and with the Company's policies and procedures.

### **10 – Assets safeguard**

Employees must preserve the properties, structures and equipment of the Company and utilize them in a responsible way. They are also prohibited from using facilities, materials and / or supplies belonging to NIGREMA SRL, as well as the services of the Company's staff for personal gains.

### **11 – Keeping appropriate accounting records and company registers**

Finally, the Company's policy requires full compliance with the laws and regulations on the accuracy and completeness of accounting books and documentation. It is forbidden to set up hidden or unregistered funds for any purpose. However, an internal accounting control system must be kept to ensure that transaction records allow financial statements in accordance with the accepted accounting principles and other requirements specified by NIGREMA SRL, and to account for all assets of society.

### **12 – Preservation of documentation**

In conclusion, employees and administrators must follow the documentation management policies relating to their function (conservation and elimination) for legal and regulatory reasons. The sectors most affected by these policies include the tax sector, personnel, health and safety, the environment, contracts, financial and corporate structure.

**GORLA MAGGIORE** – May 07, 2019

**MANAGING DIRECTOR**

**ANDREA MARCHINI**

Nigrema Srl  
Andrea Marchini  
Managing Director



#### **NIGREMA S.r.l**

Registered Office / Sede Legale: Via Bassetti 18, 20027 Rescaldina (MI) Italy  
Operating Office / Sede Amministrativa: Via 2 Giugno 277, 21050 Gorla Maggiore (VA) – Italy  
Tel. +39 0331 64 43 61 – Fax +39 0331 36 56 34 – [info@nigrema.it](mailto:info@nigrema.it) - [www.nigrema.it](http://www.nigrema.it)