

CODE OF ETHICS

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STARMATIK S.R.L.



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FOREWORD

Dear Reader,

STARMATIK S.r.l. has been operating since 1996 in the industrial automation sector, offering solutions for the most varied applications, as well as a complete, high quality service, tailor-made to the purchaser's requirements. During its first twenty years of activity, the Company designed and installed over 600 systems worldwide, with quality of service and customer satisfaction as its core goals.

STARMATIK S.r.l. identifies itself and lives by the fundamental values of innovation, honesty and transparency. The current size of the Company makes it imperative that the principles that have always inspired it be formalised into a true Code of Ethics.

The challenge STARMATIK S.r.l. has accepted is to create a formal structure for some basic rules, characterised by simplicity and clarity, to live by. The Company has adopted an Organisational Management and Control Model pursuant to Legislative Decree no. 231/2001 to prevent the risks of offences being committed by company employees, and has implemented a quality management system that complies with the requirements of ISO 9001:2015.

This Code of Ethics, therefore, besides representing a synthesis of what has been experienced so far within STARMATIK S.r.l. in terms of ethics and professionalism, is a new starting point for a Company that invests and will continue to invest in conscious and careful compliance.

The General Manager
Maurizio Longato



GOALS AND RECIPIENTS

This Code of Ethics illustrates the set of moral principles and reference values that are the basis of STARMATIK S.r.l.'s activity, as well as the fundamental lines of conduct adopted by STARMATIK S.r.l. in the relationships between shareholders, directors and employees and in those with institutions, suppliers, customers, occasional collaborators and the media.

The primary objective of the Code of Ethics is to make the values the Company lives by common and widespread among all Recipients, so that they can become essential reference points when operating on behalf of the Company, in order to avoid all and any actions that could damage the Company itself. The Code is applicable to the behaviour of the Corporate Bodies, managers, employees and collaborators of STARMATIK S.r.l. (hereinafter, the "Recipients").

STARMATIK S.r.l. also requires its commercial and financial partners, main suppliers, contractors and assignees to conduct themselves in line with the general principles of this Code of Ethics.

The Code of Ethics is valid in Italy and abroad, and is reasonably applicable to the different cultural, political, social, economic and commercial realities of the various countries in which STARMATIK S.r.l. operates.

The Code of Ethics is given the widest possible dissemination, both inside and outside the corporate structure. The Company undertakes to take any further initiative to ensure that the principles and provisions of the Code are duly disseminated and applied, also by organising and providing *ad hoc* training meetings with the Recipients.



COMPANY MANAGEMENT

STARMATIK S.r.l. believes that management efficiency and a culture of check and balances are essential for achieving its goals.

To this end, the Company adopted an ISO 9001:2015 certified quality system, as well as a series of policies and guidelines that will be progressively implemented and updated.

The Recipients are required to follow strictly the Company's internal procedures and instructions and must act in accordance with the relevant authorisation profiles, as well as keep all appropriate written documentation to ensure the traceability of the actions undertaken on behalf of the Company.

Every operation and transaction must be authorised, recorded, verifiable, legitimate, consistent and appropriate.

- ⇒ **Authorisation:** every operation must be authorised by the person responsible for the individual action, the type of operation, the company function in charge of the operation, or by the Management. The powers and responsibilities for each performed operation shall be ascribable to each person on the basis of the corporate organisation chart and of specific acts adopted by the Company.
- ⇒ **Recording:** each operation shall be suitably and intelligibly recorded in one of the Company's Books or Registers or shall be reported, even in the form of a memorandum or information note, even though it may not have financial and economic evidence.
- ⇒ **Verifiability:** each operation shall be verifiable by the supervisor of the resource who actually carried it out, as well as by the internal control bodies.
- ⇒ **Legitimacy:** every operation must be carried out in compliance with the Laws and Regulations of the State in which the Company operates, and with the Company's Regulations and procedures.
- ⇒ **Consistency:** all actions and operations shall have the only purpose of producing value and developing the Company in full compliance with the law.
- ⇒ **Suitability:** every operation decided and carried out must be economically valid. This principle is based on a cause-effect relationship, whereby actions and operations are considered suitable if they are ethically correct and adopted in order to avoid worse results, even though their actual outcome might be negative (in terms of financial or corporate utility).



THE VALUES

The conduct of the Recipients, at all company levels, is marked by respect for the principles of honesty and fairness, for the laws in force and for company procedures.

⇒ **Lawfulness**

STARMATIK S.r.l. operates in absolute compliance with the laws from time to time in force, of any type and rank, as well as with this Code of Ethics.

Each employee of the Company, in the performance of their duties, undertakes to comply with these regulations, as well as with generally recognised practices. They also base their decisions and conduct on the changes in the regulatory framework that may be introduced from time to time. They also base their decisions and conduct on the changes in the regulatory framework that may be introduced from time to time.

This commitment also applies to consultants, suppliers and anyone who has dealings with the Company. STARMATIK S.r.l. will not initiate or continue any relationship with anyone who does not intend to respect this principle.

⇒ **Responsibilities**

Each Recipient must perform their work and services with diligence, efficiency and fairness, using the tools and time at their disposal to the best of their ability and assuming the responsibilities associated with the requirements, in compliance with the regulations in force, and the procedures and tasks established by STARMATIK S.r.l.-

Therefore, the aforementioned Recipients must refrain from conduct that does not comply with the provisions contained in this Code of Ethics and must promptly report to the appropriate persons any breach - or alleged breach - of the provisions contained in the Code of Ethics.

⇒ **Fairness**

All Recipients are required to behave with fairness and moral integrity.

The conduct of each Recipient in the performance of their function or assignment shall be inspired by lawfulness in both form and substance, as well as by fairness, cooperation, loyalty and mutual respect.

The Recipients must not use any information, goods, equipment or materials at their disposal for the performance of their functions or assignments for personal purposes and are also required to comply diligently with the laws from time to time in force and with this Code of Ethics, as well as with the internal regulations.

The Recipients shall in no way accept, nor exert pressures or make recommendations, on their own behalf or on behalf of others, which may be prejudicial to STARMATIK S.r.l. or may bring an undue



advantage to the Recipient, to STARMATIK S.r.l. or to third parties.

Consequently, each Recipient must reject and, in any case, not make promises or undue offers of money or other benefits, unless these are of modest value and certainly not in connection with requests

of any kind.

Should the Recipients receive an offer or a request for benefits from a third party, except for gifts of commercial use or of modest value, they must not accept such an offer or comply with such a request and must promptly and exhaustively inform their hierarchical superior or the Administrative Body of STARMATIK S.r.l. which shall, after verifying the grounds, inform the Supervisory Body.

⇒ **Conflict of Interest**

In the performance of the activity to which they are assigned or their office, the Recipients shall pursue the objectives and general interests of STARMATIK S.r.l., in compliance with current regulations and this Code of Ethics.

The Administrative Body of STARMATIK S.r.l. must be informed of the situations in which the Recipients may have interests in conflict with those of STARMATIK S.r.l. or, if it is relatives or them that have such interests, of any other case in which there are reasons of convenience to be taken into due consideration for the purposes of compliance with this Code of Ethics.

The Recipients must respect the decisions that are taken in this regard by STARMATIK S.r.l., refraining, in any case, from carrying out operations that may be in conflict of interest.

⇒ **Confidentiality**

The Recipients must ensure the utmost confidentiality with regard to news and information that are part of the company's assets or concerning STARMATIK S.r.l.'s activity, in compliance with the laws and regulations, this Code of Ethics and the Company's internal procedures.

STARMATIK S.r.l. undertakes to protect and maintain the confidentiality of the information generated or acquired within the corporate structure, relating to employees, managers, the Administrative Body and collaborators in general and to avoid any improper use of such information.

⇒ **Use of computer systems**

All the Recipients of this Code of Ethics are responsible for the security and care of the computer systems they use and are required to comply with the regulatory and corporate provisions in force, as well as comply with the conditions contained in the licence agreements for the relevant computer programmes.

Without prejudice to the provisions of the laws in force, the use of network connections (Internet) for purposes other than those strictly connected to the performance of one's functions/work assignments is considered an improper use of corporate assets.

Finally, the Recipients are required to try and prevent possible offences through the use of IT tools.



⇒ **Loyalty and Collaboration**

Business relations marked by criteria of conduct and loyalty, honesty, collaboration and mutual deference make it possible to ensure durable relationships of trust and cooperation with internal and external stakeholders, for mutual benefit and effective growth.

All those who work for STARMATIK S.r.l., without distinction or exception, are therefore required to observe and enforce these principles within the scope of their functions and responsibilities.

This commitment requires that the parties with whom the Company, and its officers on its behalf, establish contacts in any capacity, also act by adopting precepts and methods inspired by the same values.



BEHAVIOUR IN INTERACTIONS WITH THE COMPANY'S PARTNERS

The Recipients shall deal with third parties with courtesy, competence and professionalism, in compliance with the law, in the belief that the protection of the company's image and reputation depends on their conduct.

⇒ **Relations with Institutions and the Public Administration**

For the purposes of the application of this Code of Ethics, Public Administrations are any public body, independent agency, natural person or legal entity, acting as a public official or in charge of a public service.

It is prohibited to give or promise remuneration in any form, directly or through third parties, to induce, facilitate or unlawfully remunerate the performance of an official act or an act contrary to official duties by the Public Administration.

The same behaviour aimed at favouring, damaging or exerting unlawful pressure on a party in civil, criminal or administrative proceedings is also prohibited.

If the Recipients of this Code of Ethics receive explicit or implicit requests for benefits of any kind from a public official or a person in charge of a public service, they must immediately inform their immediate supervisor or the Administrative Body of STARMATIK S.r.l., who will assess whether to immediately suspend all relations and, in any case, will notify the Supervisory Body.

⇒ **Relationships with customers**

STARMATIK S.r.l. maintains fair, professional, efficient, serious and reliable relations with its customers.

In carrying out its activities, the Company always strives to fully satisfy customer expectations, offering high quality goods and services.

⇒ **Relationships with Suppliers**

The selection of suppliers and the determination of purchasing conditions are based on an objective assessment of the quality and price of the good or service, as well as the levels of assistance and timeliness offered.

In their relations with the suppliers, the recipients of the Code of Ethics must make sure that the Company's needs are met, refusing compensation of any kind and gifts of more than symbolic value; it



is incumbent on the recipients to inform their immediate supervisor of the remuneration or gifts received, so that said supervisor can assess whether there are grounds to initiate disciplinary proceedings.

It is forbidden to offer or pay undue remuneration, gifts or favourable treatment of more than symbolic value and, in any case, outside of normal courtesy behaviour, in order to promote the interests of STARMATIK S.r.l. In an unlawful manner.



BEHAVIOUR IN INTERNAL INTERACTIONS

STARMATIK S.r.l. recognises the essential importance of human resources, as they are the Company's main success factor in a framework of mutual trust and loyalty.

The Company aims at enhancing the value of its human resources, undertaking to cultivate the development of the knowledge and skills of each person, by offering the appropriate professional refresher training and promoting the participation of workers in company life.

⇒ **Relations with employees and collaborators**

All STARMATIK S.r.l. personnel are hired under a regular employment contract and the working relationship develops in compliance with the provisions of the collective bargaining agreements for the relevant sector and the tax, welfare and social security regulations.

STARMATIK S.r.l. prohibits any form of discrimination against its employees and collaborators, including during the hiring process. The selection criteria are based on matching the requirements of the positions offered by the company with the skills possessed by the candidate.

⇒ **Updating and training of human resources**

STARMATIK S.r.l. disseminates and promotes the knowledge of this Code of Ethics and its updates.

Employees may in any case ask their supervisors and the Administrative Body for explanations and clarifications on the contents of this Code of Ethics.

For new hires, and for consultancy or collaboration relationships, STARMATIK S.r.l. shall provide the necessary information to allow adequate knowledge of this Code of Ethics and the Organisational Management Model.



FORMS OF PROTECTION

Through its commitment, STARMATIK S.r.l. makes explicit the purpose, the common aim of the activity of the individuals who perform their work within the organisation and maintain external relations for it.

⇒ **Protection of competition**

STARMATIK S.r.l. recognises that correct and fair competition is a fundamental element for the development of the Company. Therefore, each Recipient must refrain from engaging in acts and behaviour contrary to civil and fair competition between companies.

⇒ **Protection of the environment**

The activities of STARMATIK S.r.l. are managed in compliance with environmental regulations. In their work, the Recipients of this Code of Ethics undertake to comply with the regulations concerning environmental protection and safeguarding from time to time in force and to conduct their activities without harming the environment, with a correct use of the available resources.

⇒ **Protection of the privacy of employees, customers and suppliers**

STARMATIK S.r.l. undertakes to protect keep the personal information and opinions of each of its employees and, in general, of those who interact with the Company confidential. Respect for the dignity of employees also includes respect for their private correspondence and interpersonal relations with other employees, thus the prohibition of interference or forms of control that may harm the individual's personality. Any investigation concerning personal tastes, preferences, tendencies and, more generally, the private life of staff, customers and suppliers is prohibited.

⇒ **Protecting health and safety in the workplace**

Within the scope of its activity, the Company undertakes also to ensure safety and protect the health of its employees.

STARMATIK S.r.l. undertakes to spread and consolidate a culture of safety awareness, through education on the nature of risks and the promotion of responsible behaviour by all personnel.

Furthermore, the Company works to preserve the health and safety of workers through technical, organisational and procedural preventive actions, favouring - as far as possible - objective prevention and protection systems over subjective ones.

The Company pays particular attention to compliance with safety regulations: workplaces, activities, procedures and equipment are subject to constant assessments, carried out and documented in



accordance with the provisions of Legislative Decree No. 81/2008 as subsequently amended and integrated and with the technical regulations.

⇒ **Protection of human resources**

The Company respects and protects the dignity, health and safety of its personnel.

STARMATIK S.r.l. undertakes to protect the physical and moral integrity of its employees, ensuring working conditions that are respectful of individual dignity, in full compliance with collective and individual contracts, the Workers' Statute, company agreements and the regulations on the protection of health and safety in the workplace from time to time in force.

The Company shall make sure that acts of violence or psychological coercion and attitudes or behaviour that are likely to damage the dignity of the individual are not carried out.

STARMATIK S.r.l. shall punish all behaviour aimed at inducing or forcing people to adopt behaviours that entail a violation of this Code of Ethics.



GUIDELINES OF THE SANCTIONS SYSTEM

Compliance with the rules of the Code of Ethics must be considered an essential part of the contractual obligations of employees pursuant to and for the purposes of Article 2104 of the Italian Civil Code.

Any violation of the rules of the Code of Ethics shall constitute a breach of the obligations of the employment relationship or a disciplinary offence, in compliance with the procedures provided for by the Workers' Statute and the National Collective Labour Agreements, with all legal consequences, including with regard to the preservation of the employment relationship, and may lead to compensation for damages arising therefrom.

To further clarify the disciplinary measures that may be imposed, reference is made to the penalty system identified in the Organisational Management Model.

Compliance with the Code of Ethics must be considered an essential part of the contractual obligations undertaken by external collaborators and persons having business relations with the Company.

