



Summary of the Code of Ethics and Company Policy for Social Responsibility

1- The Mission of MIVV SPA in terms of Social Responsibility

MIVV SPA (hereinafter also referred to as “organization”) is constantly committed to ensuring the utmost consideration and compliance with the principles of social responsibility which are regulated according to the norm UNI EN ISO 26000:2020 and specifically:

- the constant commitment to account (the principle of accountability) for the impact of corporate decisions on the stakeholders, society and more generally on the economy and the environment;
- the guarantee of maximum transparency concerning the decisions and activities of the organization;
- the adoption of ethical behaviour and commitment to influence in this way the organizations which are under its control and sphere of influence;
- respect for and consideration of the stakeholders’ interests;
- respect for the principle of legality and international rules of conduct in all circumstances;
- respect for human rights by recognizing their importance and universality;

MIVV SPA recognizes the importance of:

- social responsibility;
- directing its decisions and activities for sustainable development;
- identifying its stakeholders including their needs and expectations.

In compliance with UNI EN ISO 26000:2020, MIVV SPA addresses all fundamental issues of social responsibility and for each of them identifies the specific aspects which are considered relevant, applicable and significant for the organization and for its stakeholders. The organization also identifies and describes the actions taken and/or to be taken to address the fundamental issues with their specific aspects and is committed to ensuring the required resources in order to be able to carry out the planned actions.

2- The Code of Ethics of MIVV SPA and its Recipients

MIVV SPA aims to establish and maintain over time relations based on absolute trust with workers, customers, suppliers, commercial partners, institutions and public authorities, companies, communities and all other stakeholders by adopting business actions and choices in full compliance with the law.

The recipients of the Code are all members of the management and control bodies, employees, consultants, partners, anyone who hold positions in the company and any other person with whom the organization may come into contact during the exercise of its business activity.

3- The Governance of the Organization

MIVV SPA has a decision-making and organizational structure that allows it to create and develop an environment and a corporate culture based on the principles of social responsibility, to use financial, natural and human resources effectively and efficiently and to guarantee a fair balance between the needs of the organization and those of its stakeholders.

4- Human Rights

MIVV SPA guarantees full respect for human, civil, political, economic, social and cultural rights and does not tolerate any violation of them.

The organization proves its willingness to resolve disputes by favouring an approach based on dialogue, clarity and completeness of information.

The organization does not tolerate any form of discrimination against stakeholders on the basis of characteristics, such as race, social class, national origin, caste, birth, religion, disability, gender, sexual orientation, marital status, trade union membership or political opinion, age or any other condition which could lead to discrimination.

Concerning labor rights, MIVV SPA guarantees freedom of association, equal opportunities and the absence of forced and/or child labor.



5- Employment Relations and Working Conditions

MIVV SPA ensures on every occasion that the working conditions comply with the national legal and regulatory provisions, in line with the applicable international labor standards and respects provisions established by collective agreements. MIVV SPA guarantees adequate working conditions with regard to wages, working hours, weekly rest, holidays, health and safety, maternity protection and the possibility of combining work with family responsibilities.

Concerning health and safety in the workplace MIVV SPA:

- applies all the principles of health and safety management and complies with all applicable legal and regulatory provisions, with particular reference to Legislative Decree no. 81/2008;
- verifies and supervises all health and safety risks generated by its activities;
- provides the necessary safety equipment, including individual and collective protective equipment, for the prevention of injuries, illnesses and accidents at work and for the management of emergencies;
- provides its employees with adequate health and safety training at work.

MIVV SPA guarantees all employees access to skills development, training and apprenticeships and the opportunity for promotion prospects.

6- Environment

MIVV SPA identifies the relevant aspects and possible impacts of its decisions and activities on the surrounding environment and implements measures to prevent pollution and the generation of waste, ensuring proper management. MIVV SPA complies with all the rules contained in its own General Environment Authorization(*Autorizzazione Unica Ambientale*). MIVV SPA is committed to implementing the measures for the efficient use of resources and, where possible, to integrating or replacing non-renewable resources with alternative sustainable, renewable and low environmental impact sources in order to mitigate the impacts of climate change potentially linked to its activities and to adapting to them.

7- Correct Management Practices

MIVV SPA identifies corruption risks and implements and maintains policies and practices that counteract the occurrence of corruption events. It also prohibits making direct or indirect contributions to political parties, movements, committees and political and trade union organizations, or to their representatives. MIVV SPA conducts all activities in perfect line with the legal and regulatory provisions on competition. The organization considers, where possible, ethical, social, environmental, gender equality and health and safety criteria in its purchasing and distribution policies and practices.

MIVV SPA refrains from carrying out activities that violate property rights.

8- Specific Aspects Relating to Consumers

MIVV SPA does not engage in deceptive, misleading, fraudulent or unfair, unclear or ambiguous practices, including the omission of important information and undertakes to share such information in a transparent manner, in such a way that it is easily accessible and comparable, in order also to allow the customer to make decisions on the basis of correct knowledge. The organization provides products and services that, under normal and reasonably foreseeable conditions of use, are safe for users, other people and the environment. MIVV SPA contributes to sustainable development also by offering high quality products.

The organization offers services and support to customers, in order to obtain an efficient and effective resolution of complaints and disputes. MIVV SPA processes personal data in full compliance with current legislation on the protection of personal data and in particular with the Eur. 679/2016 Regulation (GDPR).

9- Community Involvement and Development

MIVV SPA maintains clear, fair and transparent relations with local government officials and political representatives and promotes and supports education and culture at all levels.

MIVV SPA is committed to considering the impact of its investment decisions on the creation of new jobs



and evaluates the opportunity to engage in partnerships with universities and schools.

The organization is committed to considering the economic and social impacts of entering or leaving a community.

10- Correctness, Professionalism and Conflict of interest

The conduct of the internal and external subjects of MIVV SPA are based on the utmost honesty and loyalty and both formal and substantive legitimacy, which aim to avoid conflicts of interest.

11- Relations with Customers, Suppliers and Third parties

MIVV SPA establishes and maintains excellent relationships with its customers over time, in order to always guarantee the highest degree of satisfaction. MIVV SPA is committed to supplying products characterized by high quality and safety standards. The organization also guarantees courtesy, professionalism and availability towards customers. Relations with suppliers and external collaborators are also inspired by principles of honesty, loyalty and transparency.

12 Administrative, Accounting and Financial Resources Management

MIVV SPA carries out all operations relating to the preparation of the financial statement and all other corporate and accounting documents in line with the reference accounting principles, legislative provisions, procedures and corporate practices. The organization constantly monitors financial flows (both incomings and outgoings) in full compliance with the law and company's procedures and practices.

13- Human Resources

MIVV SPA recognizes the primary importance of its human resources and guarantees them the same job and career opportunities.

The organization rejects and condemns any type of harassment or bullying, any form of physical or moral violence and does not allow people to be under the influence of alcohol and / or drugs during the working activity.

14- Quality, Health and Safety in the Workplace and the Environment

The management system of MIVV SPA complies with ISO 9001 and ISO 3834 - 2 and the organization carries out its business in full compliance with the rules relating to health and safety in the workplace and for the protection of the environment.

15- The Implementation of the Code of Ethics

MIVV SPA will strive to implement the Code of Ethics inside and outside the organization with the aim of communicating the rules and principles herein indicated and will make reasonable efforts in the case of significant revisions or updates to the aforementioned text.

The board of directors of MIVV SPA

Sant'Omero, 04.03.2022