



# JVP

**Raised** access floor  
Pavimento **sopraelevato** accessibile



## Code of Ethics of JVP srl

Index of topics covered.

**Foundations**

**Legality, transparency, fairness and legitimacy**

**Internal personnel**

**External personnel, relations**

**Occupational health and safety**

**Environment**

**Suppliers**

**Customers**

**Competition, industry and trade**

**Relations with the public administration**

**Company, administration and finance**

**Corporate assets and computer systems**

**Press and communication**

**Compliance with, and modification of, the Code of Ethics**



## **Foundations**

JVP srl has independently chosen to adopt this Code of Ethics, an unequivocal indication of its desire to:

- maintain the focus of all persons involved in the management of potential risk areas at all times
- provide clear guidelines to anyone involved to help recognize and address ethical problems
- help maintain a culture of integrity, honesty and accountability within and around the company.

This code is based on the fact that everyone involved in JVP in every position and at every level of the company organisation or extra-company organisation, has their own personal approach to work and to work relationships, which must be coordinated with that of others and with JVP's general design, in the full interest and respect of JVP and the entire community.

This code embraces the lines contained in the ten principles of the Global Compact, and aligns itself with them, breaking them down in the following points.

This code formally refers to the organisational model provided for in Legislative Decree no. 231/01 and defines the values and principles of conduct relevant to JVP's proper functioning, reliability, legal and regulatory compliance, and image.

This code contains all of the rights, duties and responsibilities of the persons concerned, inside and outside the company, regardless of that which is required by law, with which it does not conflict.

Regardless of their position, all persons working to reach JVP's corporate objectives, excluding none, are required to comply with this Code of Ethics when conducting business and business activities.

This code also applies to external co-workers and consultants acting on behalf and in the interests of JVP.

Anyone entering into relations with JVP is encouraged to conduct business in accordance with the fundamental principles of honesty, moral integrity, fairness, transparency, objectivity and respect for the individual in the pursuit of business objectives and in all relations with persons and bodies inside and outside the company.

Under no circumstances may the pursuit of JVP's interests justify any action that does not comply with an honest course of conduct. Therefore, JVP reserves the right not to engage in or continue any kind of relationship with anyone who is not prepared to abide by this Code of Ethics.

## **Legality, transparency, fairness and legitimacy**

Every person involved with JVP is required to comply with the laws and in general with the regulations in force in the country in which he or she operates, and to respect good business practices implementing legal obligations.

Every person involved with JVP is required to comply with professional and ethical rules, particularly in regard to the duties of diligence and skill applicable to the operations performed on behalf of the company.

Every person is also required to respect the company rules, which express in detail the means for pursuing objectives in respect of the principles of ethics and behaviour the company has adopted to implement its ethical, expert or professional obligations.

Every person involved with JVP is required to respect the duty of transparency, which is understood as clarity, completeness and relevance of information, avoiding deception in transactions performed on behalf of the company, and to respect company rules implementing the principle of transparency.

JVP consistently performs its business in full compliance with current anti-money laundering laws and regulations issued by the competent authorities.

JVP's principle is maximum transparency in its commercial transactions, so it prepares tools to combat the receiving of stolen goods, money laundering and the use of cash, goods or benefits of illicit origin.

No JVP employee may ever perform or be involved in activities involving money laundering, i.e. accepting or processing proceeds from criminal activities in any form or in any way. Everyone at JVP, each according to their role and powers, must verify available information, including financial information, on their business counterparts, consultants and suppliers in advance in order to ascertain their moral integrity, respectability and the legitimacy of their business, before establishing business relations with them.

Everyone at JVP is required to strictly observe the laws, guidelines and business procedures in any economic transaction involving them, ensuring full traceability of incoming and outgoing cash flows and full compliance with anti-money laundering laws, where applicable.

### **Internal personnel**

JVP protects and promotes the value and development of the people involved as a fundamental factor of the company's success, in order to encourage full professional development on the basis of merit.

Any hire, transfer or promotion must in no way be influenced by offers or promises of sums of cash, goods, benefits, concessions or services of any kind other than those adopted by the contract.

JVP establishes and operates to ensure that authority is exercised with fairness and transparency in hierarchical relations, avoiding any behaviour that could be considered harmful to the employee's dignity and autonomy.

**JVP monitors** and works constantly to prevent any form of discrimination against any person involved in the life of the company based on race, nationality, sex, age, disability, sexual orientation, political or labour union opinions, education, or philosophical or religious beliefs.

JVP monitors and works constantly to prevent sexual harassment or acts of physical or psychological violence and is committed to protecting its employees' moral integrity, guaranteeing the right to working conditions that respect personal dignity, including and above all, for potentially more fragile persons.

JVP tolerates no form of undeclared labour, which, in addition to the mere absence of any formal relationship, includes any use of labour not covered by a contractual and regulatory framework consistent with the reference framework.

At the start of every employment relationship, the person concerned must receive accurate information regarding the following:

- characteristics of the position, responsibility for their role and duties, as well as disciplinary rules from legal, contractual or regulatory sources
- regulatory elements and remuneration, as well as the rules and procedures in general to be adopted to prevent conduct contrary to the law and company policy
- full knowledge of all useful provisions, tools and business solutions permitting recognition of potential risks to the person, as well as related prevention measures

Everyone involved must avoid generating or facilitating operations that are or could generate a conflict of interest with the company, as well as activities that may interfere with the ability to make impartial decisions in JVP's best interests in full compliance with the principles of this code.

In particular, no one involved may have or accrue any financial or personal interest in the choice of supplier, competitor or customer or engage in any work that may lead to a conflict of interest.

The privacy of company personnel is protected under Legislative Decrees 196/03 and 101/18.

### **External personnel, relations**

In relations with external consultants and other co-workers, everyone at JVP is required to:

- carefully assess the actual interest of using the external consultants' and collaborators' services, and select counterparts having appropriate professional qualifications and reputation
- establish efficient, transparent and collaborative relations, maintaining an open and frank dialogue respecting the best business practices
- guarantee the best quality of the service for the money at all times
- demand the application of contractually required conditions
- act within the scope of the current legislation and require it be strictly respected

Relations with any agents must be governed by formal contractual agreements in which the conditions, subject matter of the contract and methods of collection and remuneration must be specifically indicated.

No services or payments may be made to co-workers, consultants, agents or other third parties acting on behalf of JVP, without adequate justification in the context of the established relationship or based on the type of assignment to be performed.

Violation of the principles of legality, fairness, transparency, confidentiality and respect for human dignity constitutes cause for termination of contractual relations.

The privacy of external personnel is protected under Legislative Decrees 196/03 and 101/18.

### **Occupational health and safety**

As an integral part of its business and as a strategic commitment with respect to its more general aims, JVP pursues objectives of constant improvement of occupational health and safety.

For this purpose, it:

- monitors, updates and applies all occupational health and safety provisions established by relevant laws and legislative decrees
  - undertakes to disseminate and consolidate a culture of occupational health and safety, raising awareness of risks and promoting responsible behaviour by all employees
- provides regular institutional training, delivered at specific times in employees' company lives, as well as regular training for operational personnel
- promotes and implements any initiative aimed at minimising risks and eliminating elements that could jeopardize employee health and safety
- perform technical and organisational interventions through a formal and continuously updated management program covering risks, security and resources to be protected, and through the implementation of a system effectively monitoring the adoption of developments and prevention measures, all protected by sanctions that may include expulsion from the working relationship

Everyone at JVP must protect their own health and safety and that of other persons in the workplace affected by their actions or omissions, in accordance with the training, instructions and means provided by the employer.

For this reason and others, drug use, alcohol abuse or the assumption of illegal drugs will not be tolerated in the workplace.

## **Environment**

All JVP activities are systematically composed, assessed and monitored through the adoption of, and compliance with, certified and continuously updated UNI EN ISO 14001 environmental quality criteria.

JVP guarantees full compatibility of its activities with the surrounding area and environment at all times.

It performs its business activities in total respect of the environment, understood in the broadest sense, and in particular by:

- considering and monitoring the environmental impact of production activities and processes, duly certified by strict compliance with mandatory public requirements
- responsibly and consciously using natural resources
- developing a relationship of constructive cooperation in addressing environmental issues, characterised by maximum transparency and trust, both within the company and with the external community and institutions
- maintaining high safety and environmental standards by continuously updating and voluntarily implementing effective management systems and procedures, such as membership in the FSC chain of custody for responsible forest management, EPD certification following the definition of appropriate LCA, certification on VOC emissions, subsequent C2C environmental certification, analytical count on the percentages of recycled material already applied to the entire range of available products, as well as others in the future, in line with the latest trends

## **Suppliers**

Relationships with suppliers are based on principles of transparency, loyalty, integrity, confidentiality, diligence, professionalism and objectivity.

Suppliers are chosen and goods and services purchased by appropriate company functions based on objective assessments of legality, competence, competitiveness, quality, fairness, respectability, reputation and price.

JVP suppliers must not be involved in any illegal activity and must guarantee their employees working conditions based on respect for fundamental human rights, international conventions and applicable laws.

In particular:

- the use of child labour is absolutely forbidden and unacceptable; production workers must not be younger than the minimum legal age allowed in each State, and in any case, never under the age of 16 years

- child and non-child exploitation, forced labour, physical or mental abuse or corporal punishment are entirely unacceptable and will result in the immediate termination of any and all relationships between the supplier and JVP
- remuneration and benefits for the suppliers' employees must be in compliance with local regulations, laws and in line with international conventions
- suppliers must ensure that all products or services rendered are provided using processes protecting the health of workers in an appropriate manner and suited to the processes actually used
- JVP will not establish relations with suppliers in countries not guaranteeing all of the above.

JVP asks that its suppliers refrain from offering goods or services, particularly in the form of gifts, to company employees who exceed normal courtesy practices, and forbids its employees from offering goods or services to personnel of other companies or bodies to obtain confidential information or direct or indirect benefits for themselves or the company.

JVP is entitled to take action in the event of violation of the principles of legality, fairness, transparency, confidentiality and respect for human dignity, including terminating the relationship with the supplier.

The privacy of supplier personnel is protected under Legislative Decrees 196/03 and 101/18.

## **Customers**

Professionalism, competence, availability, respect and fairness are the guiding principles and the style of behaviour to be adopted in relationships with customers.

Consequently, relationships with JVP's customers must be pervaded by full transparency and fairness, respect for the law and independence from any form of internal or external influence.

Customer contracts and communications must:

- be clear and simple
- comply with current regulations, without resorting to any evasive or otherwise improper practices
- comply with the company's commercial policies and the parameters defined therein
- be complete, to avoid neglecting any element relevant to the customer's decision

In the context of commercial relations with customers, any behaviour undermining consumer trust in any way is absolutely forbidden, as it could cause prejudice to the transparency and security of the market.

The privacy of customer personnel is protected under Legislative Decrees 196/03 and 101/18.

## **Industry, trade and competition**

JVP protects the value of fair competition by refraining from collusive and predatory behaviour. Anyone working with JVP must comply with the principles and rules of free competition, without violating competition, antitrust or consumer protection laws.

In the spirit of JVP, it is absolutely forbidden to adopt or engage in any conduct violating the usual and free exercise of trade and industry whose negative nature undermines confidence in the market and good faith in trade.

In the constant pursuit of fair competition and the protection of the users of JVP 4x4 systems, JVP and its co-workers must refrain from infringing third parties' intellectual property rights and to respect the rules protecting the distinctive signs of original works or industrial products (trademarks, patents), systematically monitoring full compliance with industrial and intellectual property regulations.

It is absolutely forbidden to market products bearing signs, figures or false statements that would create confusion on the actual origin, provenance or quality of the work or product.

## **Relations with the public administration**

Relations with the public administration and public institutions, such as ministries and their peripheral offices, public authorities, bodies and companies operating in public services, regional and local authorities, competition and market authorities, and the personal data protection authority are maintained by company representatives or by persons previously and formally delegated to this role in compliance with the rules of this code and the laws in force, having particular regard to the principles of fairness, transparency and efficiency.

In particular, and purely by way of example:

- it is forbidden, directly or indirectly, or through a third party, to offer or promise cash, gifts or considerations in any form, to exert unlawful pressure or to promise any object, service, benefit or favour to public administration executives, officials or employees, or to public service officers or their relatives or cohabitants for the purpose of persuading them to perform an act related or contrary to their official duties
- it is forbidden to behave in a deceitful manner that may mislead the public administration. In particular, it is forbidden to use or submit false documents, to make false statements, or to omit information in order to obtain contributions, financing or other disbursements of any kind granted by the State, a public authority or by the European Union for the benefit or in the interests of the company.
- it is forbidden to use contributions, financing, or other disbursements of any kind granted by the State, a public authority or by the European Union for purposes other than those for which they are allocated



- in the case of commercial relations with the public administration, including participation in public tenders, it is necessary to act always in accordance with the law and good commercial practices
- it is forbidden to alter in any way the functioning of a computer system of a public authority or to intervene illegally in any way on the data, information and programs contained therein or relevant to it, in order to obtain an unfair advantage at the expense of others.

To ensure the proper functioning of the public sector, in particular of the courts, JVP forbids all subjects required to comply with this Code of Ethics, to undertake any unlawful action, directly or indirectly, that might favour or harm any of the parties involved in civil, criminal or administrative proceedings.

In particular, it is forbidden to exercise undue pressure such as offering or promising cash or other benefits, or unlawful coercion such as violence or threats in order to induce a person called before the judicial authority in criminal proceedings to refuse to make statements or to make false statements when the person has the right to remain silent.

### **Company, administration and finance**

In order to always provide shareholders and the public with true and honest information on JVP's economic, financial and financial situation, anyone acting on behalf of JVP is forbidden to behave in an improper, non-transparent or uncooperative manner, or one that does not comply with legal rules and internal procedures. This applies to all activities regarding the preparation of its financial statements and other company communications.

Every operation or transaction must be accurate, verifiable and legitimate.

This means that every operation and transaction must have an adequate accounting record and must be supported by appropriate documentation in order to allow audits, the identification of different levels of responsibility and an accurate reconstruction of the transaction.

All persons and entities involved in any capacity, even as mere data providers, in the preparation of financial statements and documents representing the economic, financial or financial situation of JVP, and in particular directors, auditors and persons holding senior positions:

- are required to always cooperate to their utmost on specific aspects and to guarantee the completeness and clarity of the information provided and the accuracy of the data and processing
- are forbidden to present facts not corresponding to the truth, even if they are the subject of evaluation, namely omitting information or concealing data in direct or indirect violation of regulatory principles and internal procedural rules, in order to mislead the recipient of the aforementioned documents
- are forbidden to generate simulated transactions or to spread false information about the company's business

No one at JVP shall prevent or hinder audit activities legally assigned to shareholders or other company bodies.

No one at JVP shall undertake any simulated or fraudulent conduct aimed at influencing the shareholders' meeting in order to provide an unfair profit to themselves or to others.

JVP always guarantees the dissemination and observance of principles of conduct aimed at protecting company capital, creditors and third parties establishing relations with the company in full compliance with the rules of law.

### **Corporate assets and computer systems**

All JVP activities are composed, assessed and monitored systematically through the adoption of, and compliance with, certified and continuously updated UNI EN ISO 9001 quality criteria.

The company protects the personal data of all subjects having dealings with it, in accordance with the privacy laws in force dictated by Legislative Decrees 196/03 and 101/18.

JVP's documents, working tools, procedures, equipment and all other material and immaterial goods, including intellectual property rights and trademarks, are used exclusively for business purposes, in accordance with established methods. They may not be used for any illegal purpose and must be stored with the same care reserved to one's own property.

Any illegal uses are punishable, including by disciplinary action, even if they are not punishable by law.

Information that is also company property learned in the performance of one's duties is subject to legal requirements and the duty of confidentiality.

These duties must also be observed after termination of the relationship with the company in accordance with the requirements of the aforementioned regulations.

Computer and electronic devices (such as telephones and fax machines, e-mail, Internet, intranet, and hardware and software in general) provided to personnel are working tools and must be used solely for business purposes. This applies to personal computers as well as other tools, programs and services.

Every employee is required to take necessary care to prevent the possible commission of crimes through the use of computer tools.

In particular, employees are forbidden to:

- access a computer system illegally
- hold and disseminate illegally access codes to computer systems without authorisation
- share equipment, systems, devices or computer programs capable of damaging, deleting or intercepting information between them

No JVP operator may upload borrowed, unauthorised or unlicensed software to business systems, or make unauthorised copies of licensed programs for personal, business or third-party use.

### **Press and communication**

JVP maintains relations with the press and mass media only through corporate bodies and corporate functions delegated to this purpose. These relationships are always based on principles of fairness, availability and transparency in compliance with the communication policy.

No one at JVP is permitted to provide information to mass media without the prior and specific authorisation of the competent functions.

Company information and communications must be accurate, complete, true, transparent and consistent.

### **Compliance with, and modification of, the Code of Ethics**

Any violation of the rules set out in this code harms the relationship of trust established with the company and may lead to disciplinary action and claims for damages.

Observance of this code by anyone working at JVP, along with the commitment in good faith to respect the general obligations of loyalty, fairness and observance of the employment contract, must be considered an essential part of contractual obligations, including under and for the purposes of Article 2104 of the Civil Code.

Conduct by anyone at JVP in violation of the rules of conduct or procedure contained in this code must be understood as disciplinary offences punishable in compliance with applicable law and the employment contract.

Compliance with the Code of Ethics by third parties includes the obligation to perform the duties of diligence and good faith in the negotiation and execution of contracts with the company.

Violations committed by third parties will be punishable in accordance with their duties and contracts.

The Board of Directors or the Sole Director of JVP srl alone is responsible for any modifications or integrations to this Code of Ethics.

Piove di Sacco, 30 August 2019

Lorenza Corazza



p.p.v. Carlo Valerio Segno sas

