

Code of Ethics

adopted by the General Management of ASCOM on 20/01/2024 (rev. 2024.v00)

Message from the General Management

Welcome to ASCOM srl's most important document: our Code of Ethics. The Code of Ethics expresses the ethical commitments and responsibilities in the conduct of business and company activities and defines the set of values and principles, as well as the behavioural guidelines that directors, employees, collaborators and all those who work to achieve ASCOM srl's objectives must follow.

Compliance with the principles it contains is essential for the correct functioning, reliability, reputation and image of ASCOM, factors that constitute a decisive asset for company success, consistent with the principles of legality and social responsibility.

Our actions, our words and our behaviour matter.

Gastaldi Enrico - General Management

1. Who we are

Ascom S.r.l., founded in October 2012, has its operational headquarters and offices in Moncalieri, Via Enzo Ferrari 40, in the first belt of Turin. The company specialises in the design and manufacture of moulds for aluminium and magnesium foundries for the automotive sector, applying methods and construction systems aligned with the most modern technologies and management techniques.

ASCOM's mission is the protection of workers, environmental resources and company assets, through the supply of research, technologies, services and high-quality products able to ensure the complete satisfaction of its Clients in Italy and worldwide. ASCOM has made the development of Quality, Environmental Protection, Health and Safety the main element of its corporate culture, operating in compliance with the UNI EN ISO 9001:2015 certification.

2. Recipients of the Code of Ethics

The Code of Ethics is addressed to directors, control bodies, management, all employees and those who operate, directly or indirectly, permanently or temporarily, to pursue ASCOM's objectives. It defines the rules of conduct to be respected in relations with shareholders, colleagues, customers, suppliers, partners, public institutions and all other stakeholders.

3. Ethical values and principles

3.1 Legality, loyalty, honesty and fairness

ASCOM operates in compliance with the laws and regulations in force, professional ethics and the internal procedures adopted. All Recipients must respect the principles of Legality, Equality, Honesty and Fairness, Impartiality and Diligence. The pursuit of ASCOM's interests can never justify conduct contrary to the principles of legality, fairness and honesty.

3.2 Transparency, reliability and completeness of information

Recipients must respect transparency, understood as clarity, completeness and relevance of information, verifying that the information communicated externally and internally is clear, truthful and complete.

3.3 Confidentiality and use of information

ASCOM guarantees the confidentiality of the information it holds and compliance with personal data protection regulations. Recipients keep the information they become aware of confidential.

3.4 Impartiality and equal opportunities

Relations between workers take place with respect for the rights and freedom of people, without discrimination based on age, nationality, ethnicity, language, gender, sexual orientation, religious belief, political or trade union affiliation or health conditions. Promotions are based on objective performance evaluation criteria.

3.5 Conflicts of interest

Recipients must avoid any situation that may set a personal interest against those of ASCOM. Any situation potentially likely to generate a conflict of interest must be immediately communicated to one's hierarchical superior.

3.6 Prevention of corruption

ASCOM prohibits any action aimed at unduly favouring its own interests and is committed to preventing acts of corruption, extortion, fraud and other illegal conduct. It is not permitted to request or accept compensation, gifts or other benefits, except for customary gifts of modest value (less than Euro 100.00).

3.7 Health and safety at work and sustainability

ASCOM is committed to respecting the provisions on the health and safety of workers and implements an eco-responsible philosophy aimed at protecting the environment, preventing all forms of pollution and promoting separate waste collection and recycling with a view to sustainable development.

4. Rules of conduct

4.1 Relations with Employees and Collaborators

ASCOM maintains a working environment based on mutual respect and the enhancement of human resources, countering any form of abuse, violence or discriminatory behaviour.

4.2 Relations with Customers

ASCOM places trust and quality of service at the centre of its relationship with Customers, always responding to suggestions and complaints and prohibiting contracts with unfair clauses.

4.3 Relations with suppliers, consultants, collaborators and business partners

Suppliers are selected with impartiality, autonomy and independence of judgement,

according to criteria of transparency, fairness and integrity, and are contractually committed to respecting the principles of the Code of Ethics.

4.4 Relations with members of the Public Administration

In relations with the Public Administration, ASCOM adopts the strictest observance of the regulations in force, without seeking to improperly influence the decisions of institutions.

5. Implementation of the Code of Ethics

The General Management verifies its correct dissemination and knowledge. All Recipients are obliged to promptly report any violations through the channel:

sustainability@ascom40.it. ASCOM does not tolerate any form of retaliation against those who report in good faith and ensures the confidentiality of the reporter.

Violation of the Code constitutes a disciplinary offence.

Courtesy English version generated from the official content - the document signed by the General Management prevails.