

# CODE OF ETHICS

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## Index

1. INTRODUCTION .....	2
2. THE ADDRESSEES .....	3
3. GENERAL ETHICS PRINCIPLES AND MISSION OF THE COMPANY .....	4
4. RULES AND STANDARD OF CONDUCT .....	5
5. GUIDING CRITERIA IN POLICIES TOWARDS RECIPIENTS AND THIRD PARTIES .....	6
5.1 Relationships with employees and collaborators .....	7
Outset srl sb undertakings .....	7
The Addressees undertakings .....	8
5.2 Relationships with Customers and Suppliers .....	8
5.3 Relationship with Public Authorities .....	9
6. GUIDING CRITERIA IN THE MANAGEMENT OF THE COMPANY .....	10
7. IMPLEMENTING INSTRUMENTS .....	10
8. INFRINGEMENT OF THE CODE OF ETHICS PROVISIONS .....	10

## 1. INTRODUCTION

This Code of Ethics (hereinafter "**Code**") approved by Outset srl sb is a set of principles and rules whose observance is of fundamental importance for the good functioning, the improvement of the reliability and the reputation of the Company.

The Code contributes to developing the common benefit goals that the Company decided to pursue by adopting the status of *società benefit* to operate in a responsible, sustainable and transparent way towards people, communities, territories and the environment, cultural and social heritage and activities, bodies and associations, other stakeholders and all those who act for the common good<sup>1</sup>:



<sup>1</sup> The business purpose of the Company has been integrated with the following aims of common benefit: the company intends to contribute to the health and safety in the workplace of operators who use their tools, thus ensuring their protection, protection and safeguard against themselves and also against third parties. The ultimate purpose of Company is the respect of all its members, both as shareholders and in other roles, always through a motivating and satisfying commitment to a prosperous economic activity. The Company intends to pursue the following specific purposes of common benefit:

- support to the community through donations or grants to non-profit organisations for liberal purposes
- reduction of the environmental impact of the company's activities through: separate waste collection; development of techniques for controlling and improving energy consumption; increase of digitisation of documents
- professional growth of employees through continuing training programmes
- support for the development of the community through the promotion and organisation of cultural events
- serenity of employees, both inside and outside the company, through initiatives to support the reconciliation of work commitments with family commitments
- in carrying out its activities, the company will endeavour to: (a) implement all the necessary safeguards so as not to cause harm to third parties; (b) minimise all kinds of waste.

The Company places particular emphasis on contributing to the ability of its members to meet their basic human needs (subsistence, rest, understanding, identity, participation, affection, reaction, freedom, protection) as a basis for people's happiness, and seeks solutions that tend towards the possibility of satisfying the basic human needs of people who are impacted by the activities in which it is involved.

In particular, the Company is committed to pursuing the creation of the best possible conditions, to attract, grow talented people.

In the pursuit of its business object and in compliance with the principles that inspire its goals, the Company creates, supports and develops projects and partnerships with national and foreign entities, public or private.

The Code is the “Charter of Fundamental rights and duties” through which Outset srl sb:

1. clarifies its ethical and social responsibilities toward internal and external stakeholders, such as employees, collaborators, suppliers, customers, public authorities
2. defines the rules governing the relationship between the Company and the stakeholders.

The adoption of the Code completes and enriches the rules contained in company regulations and procedures, namely:

- UNI EN ISO 9001:2015 certification
- UNI EN ISO 14001:2015 certification
- UNI EN ISO 45001:2018 certification
- privacy system
- B Corp® certification.

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## 2. THE ADDRESSEES



The Code applies to the members of the corporate bodies, prosecutors, employees and collaborators of the Company, consultants, key suppliers, business partners and all those who, directly or indirectly, operate in the name and on behalf of the Company (hereinafter “Addressees”).

All Addressees are required to know the Code of Ethics, to contribute to its implementation, its improvement and its dissemination.

Addressees who violate the principles and rules contained in this Code, violate the relationship of trust established with the Company.

Outset srl sb undertakes to distribute to all employees and collaborators a copy of this Code and to disseminate its contents and objectives.

### 3. GENERAL ETHICS PRINCIPLES AND MISSION OF THE COMPANY

The **mission** of Outset srl sb is the following:



We believe in the value of constant and continuous contact with our customers. The drivers of the vehicles who install our product become our partners, they are allies of our product and become spokespersons for satisfaction and its usefulness. This pushes us every day to always listen to their opinion and advice to create new solutions and new technologies, to pursue together the goal of continuous improving their work, their safety and their productivity.



The Code of Ethics is based on the following **principles**:

<b>GOVERNANCE</b>	<p><b>CUSTOMER SATISFACTION:</b> we are committed to providing products and services that are always qualified and safe. We are convinced that offering expertise encourages constructive confrontation for improvement, reduces inefficiencies and stimulates competitive and effective distinction.</p> <p><b>PASSION:</b> it is the inner motor that allows us to carry out our work in an exemplary way with a smile on our lips.</p>
<b>PRODUCT</b>	<p><b>INNOVATION:</b> to consolidate, strengthen and distinguish ourselves on the market.</p> <p><b>RELIABILITY:</b> it is the prerequisite of all our actions in our work. Safe in the street, safe at work.</p>
<b>STAKEHOLDERS</b>	<p><b>RESPONSIBILITY:</b> the moral bond is rooted in us to ensure safety and reliability to eliminate or prevent any danger.</p> <p><b>INTEGRITY:</b> we align our goals with our values and we do it for ourselves and with anyone who deals with us: upright, honest to protect everyone.</p> <p><b>GROWTH:</b> we plan, innovate and organize the company through processes that facilitate its change over time and adaptation to the market.</p>

Outset srl sb strives to give substance to the values and principles contained in the Code, taking responsibility for the inside and the outside and strengthening trust, cohesion and the company spirit.

The Company therefore undertakes to carry out training/information actions on the contents of the Code with the purposes to:

- promote and strengthen the business culture around recognised values
- disseminate the rules, procedures and practices to be followed
- extend the consent to the basic principles of this Code.

## 4. RULES AND STANDARD OF CONDUCT

### 1. Centrality of the person

The protection of the individual, understood both as respect for the individual in his physical and moral integrity and as enhancement and growth of every internal resource, is an essential value of the organization.

Outset srl sb promotes and defends the fundamental rights of individuals and repudiates all forms of gender discrimination and/or based on ethnic, cultural, linguistic, political, religious and sexual opinions and orientations, social and personal conditions.

### 2. Respect of the laws and regulations

Outset srl sb respects the applicable laws and regulations and does not admit conduct contrary to the above precepts.

### 3. Transparency and Fairness

All relationships and activities are based on the principles of transparency, fairness, loyalty, good faith and completeness of information.

The Company condemns any form of deceptive conduct and/or conduct directed at altering the rules of free competition and refrains from behaviours that may integrate unfair forms of competition.

### 4. Absence of conflict of interest

The Addressees shall refrain from situations in which a conflict of interest may arise between personal economic activities and duties performed in the Company or interests of the Company itself.

If, however, situations of conflict or potential conflict occasionally arise, maximum transparency is required towards the responsible person or the referent function, to which the circumstance must be referred for any appropriate action.

### 5. Confidentiality

The Company ensures the confidentiality of the information in its possession and protects personal data in accordance with current legislation.

Directors, employees and collaborators shall have the utmost caution and care in the use of confidential information.

The use of confidential information for purposes not related to the exercise of the activity/task is prohibited.

### 6. Financial integrity, combating terrorism and crime

Every transaction must be legitimate, consistent, fair, reasoned, registered, authorised and verifiable.

Outset srl sb does not operate any form of financing, direct or indirect, and does not in any way facilitate groups or associations that pursue illegal purposes.

### 7. Combating corruption

The Company considers the prevention of corruptive practices, not only a question of compliance with a legal obligation, but also the principles on which to act. Addressees shall not therefore:

- offer, promise, give, pay, authorize a third party to give or pay, directly or indirectly, undue benefits, economic advantages of any value or other non-economic utility to a third party (whether it is a public official, public service or private) as an incentive or reward for the performance of its functions;

8. Intellectual property

- request or accept, or authorize a third party to claim or accept, directly or indirectly, undue benefits, economic advantages of any value or other non-economic utility from a third party as an incentive or reward in the course of its duties.

Outset srl sb respects any and all form of intellectual property of his property or of a third party whether it consists of copyrights, patents, trademarks, designs, models, industrial and/or commercial secrets and any other intangible property.

9. Sustainable development

Outset srl sb has an ideal of prosperity and long-term well-being that it intends to pursue by combining the objectives of economic and financial sustainability with ethics and social and environmental sustainability.

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## 5. GUIDING CRITERIA IN POLICIES TOWARDS RECIPIENTS AND THIRD PARTIES



Outset srl sb implements environmental policies that aim to comply with current legislation and safeguard the external environment.

The Company is therefore committed to promoting a culture of environmental protection for all Addressees and considers environmental aspects as essential content both in the definition of new activities and in the revision of existing ones.

## 5.1 Relationships with employees and collaborators

### Outset srl sb undertakings

#### VALUE OF PERSONS, PROFESSIONAL GROWTH, IMPARTIALITY

- to ensure fair treatment based on merit and competence
- to offer equal employment opportunities to all employees and collaborators on the basis of professional qualifications and performance skills, without discrimination based on ethnicity, religion, opinions, nationality, gender, age, physical and social conditions
- to develop the skills and competences of each employee and collaborator through training and refresher activities

#### WORKING ENVIRONMENT, HEALTH AND SAFETY

- to ensure that internal and external labour relations do not give rise to harassment, behaviour or initiatives that create an intimidating, hostile or isolating work environment for individuals or groups of workers, which adversely interfere with the performance of other people's work or hinder other people's job and/or career prospects
- to promote and protect the health and safety of its employees and collaborators

#### DATA PROTECTIO AND CONFIDENTIALITY

- to protect the information related to the employees and collaborators generated or acquired inside and outside the Company and activate all useful measures to avoid an improper use of such information

#### ENVIRONMENT

- to safeguarding the environment as a primary asset, taking into account the need to protect the environment that is essential, for the benefit of the community and future generations, by adopting the most appropriate measures to preserve the environment itself, promoting and planning the development of activities in line with this objective
- to minimise the environmental and landscape impact of the Company activities in compliance with current legislation, taking into account and exploiting the progress of scientific research and the best experience in this field, adopting a preventive approach to environmental challenges, implementing policies oriented towards the progressive reduction of the direct and indirect impacts of the business activity
- to promote greater awareness and commitment to environmental protection, both in the local area (soil, air and water quality of the territory in which the Company operates) and with regard to global challenges (biodiversity and climate change).

## The Addressees undertakings

### RESPONSIBILITY

- perform the agreed duties, consistent with the tasks, objectives and responsibilities assigned, without delegating to other employees or collaborators the performance of activities or the adoption of decisions of its own

### DILIGENCE

- to carry out the activity with the exactness and the scrupulousness required by the assigned tasks
- use the assets and resources made available in accordance with their business use and in order to protect their preservation and functionality as every employee and collaborator is considered directly and personally responsible for the protection and conservation of the assets and resources entrusted to him for the performance of his duties
- observe the instructions provided for the protection of information and personal data

### RESPECT

- to adopt respectful and sensitive behavior towards others
- not to work under the influence of alcoholic, narcotic or similar substances and not to consume or dispose of such substances in any way during work

### BUSINESS CLIMATE

- to contribute to the creation of a professional climate in which all colleagues feel positively involved in the achievement of business objectives.

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## 5.2 Relationships with Customers and Suppliers

In **business relations** each Addressees is bound to behave respectfully of the laws and marked by maximum transparency, clarity, correctness and efficiency.

The following shall be prohibited:

- behaviours that, even if aimed at the pursuit of the corporate object, result in acts contrary to current laws, procedures, regulations and company policies implemented
- bribery, unlawful favours, solicitations, direct or indirect, aimed at obtaining undue advantages of any kind or in any case aimed at acquiring or reserving preferential treatment.

In dealing with **Customers**, each Addressee is obliged to carry out his/her duties with the aim of obtaining maximum satisfaction of the same. When requested, each Addressee is required to provide assistance and information in a courteous, polite, correct and comprehensive manner.

The Company shall:

- refrain from misleading and otherwise unfair practices in advertising and in any other commercial communication
- ensures compliance of products placed onto the market with the mandatory requirements applicable from time to time.

The selection of **Suppliers** and the determination of the conditions of purchase are made in compliance with the principles of competition, objectivity, impartiality, fairness and are based on an objective assessment of:

- o quality of goods and services
- o price of goods and services
- o or the ability of the counterparty to ensure adequate and timely assistance in goods and services.

Moreover, since Outset srl sb has as essential value the respect of the person, among the criteria considered for the choice of the Supplier there is compliance with the rules dictated to the protection of workers

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### 5.3 Relationship with Public Authorities

Outset srl sb undertakes to ensure that its employees and collaborators behave in a proper manner towards the State's financial administration. The assumption of commitments with the Public Administration is reserved exclusively to the company functions in charge.

Addressees shall not promise, offer or accept payments or goods to the public officials to promote the interests of the Company, or try to improperly influence the decisions of the other party. In case of offers/proposals from public officials, the employee or collaborator must report to their responsible person or function and refuse.

During each kind of relation with the Public Administrations (contacts, requests, negotiations, inspections, checks and controls, etc.) it is not allowed to take, directly or indirectly, the following actions:

- propose, also for interposed person, job and/or business opportunities that can benefit subjects of the Public Administration and their relatives or acquaintances
- solicit or obtain confidential information that could compromise the reputation or integrity of one or both parties
- offer or provide freebies and utilities in general
- produce false or altered documents and/or data or omit due information, in order also to obtain contributions, grants, funding or other disbursements from the State, public bodies or the European Union
- allocate grants, public funding for purposes other than those for which they were obtained
- access unauthorized IT systems of the Public Administration to obtain or modify information for the benefit of the Company.

## 6. GUIDING CRITERIA IN THE MANAGEMENT OF THE COMPANY

Transparency, accuracy and completeness of company information and accounting records are particularly important.

Each Addressee is required to cooperate in order for management data to be properly represented.

Accounting records must be based on accurate, exhaustive and verifiable information.

Each entry in the books shall reflect the nature of the transaction, represent its substance and be based on appropriate supporting documentation to enable:

- the easy accounting record
- identification of different levels of responsibility
- the accurate reconstruction of the operation.

## 7. IMPLEMENTING INSTRUMENTS

Outset srl sb ensures the widest dissemination of knowledge of the Code to all Addressees and stakeholders through planned communication and dissemination activities and training initiatives differentiated by role and responsibility.

In the event that even one of the provisions of this Code conflicts with provisions contained in the Company's internal regulations or business procedures, the Code shall prevail over such provisions.

## 8. INFRINGEMENT OF THE CODE OF ETHICS PROVISIONS

The rules contained in the Code of Ethics complement the behaviour that the Addressees are required to observe.

Compliance with this Code must be considered an essential part of the contractual obligations assumed by the Addressees and third parties and is in addition to the obligation to fulfil the general duties of loyalty, of correctness, of execution of the contract of work according to good faith.

In particular, the violation of the rules of this Code constitutes:

- breach of obligations arising from the **employment relationship**, with all contractual and legal consequences
- serious breach of the contractual obligations of **personnel not employed and third parties**, with all legal consequences, also with regard to the termination of the contract and/or assignment.