



Bottling and packaging systems

ETHICAL CODE

The Ethical Code is the main enterprise tool to manage social responsibility and to promote good practices of behavior.

The core business principles of ACMI SpA are the foundation of the Quality Policy issued on 08/23/2010 and of the Social Responsibility Policy issued on 04/10/2014. The Ethical Code has been issued at the beginning of 2017 to express these principles more completely and exhaustively, with the target to define and spread unified standards of behavior across the Company.

This first issue of the Ethical Code of ACMI SpA has been approved from the Directors Board on 08/03/2017 and starting from this date the Code has become effective.

The code must be reviewed at least every 5 years, following experiences and changes that affected its recipients, that is Company employees and stakeholders.

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What is the Ethical Code

For people working in ACMI SpA and for those who are interested to follow its mission the Ethical Code is the main enterprise tool to manage social responsibility and to promote good practices of behavior.

Primarily the Code is designed to shape the behavior of people working in ACMI SpA as direct employees or contributing as suppliers of goods or services.

Other objectives of the Code are:

- to increase the cohesion and the internal consistency: the Code is written to improve internal relations and the creation of a unified and clear public image;
- to increase efficiency: the motivation of workers towards positive goals improves the production capacity, for directly involved people and also for the context environment;
- to gain a good reputation: an organization with good rules that proudly shows its values produces a feeling of solidity in its Customers and suppliers, so that they may evolve from simple interlocutors to real partners.

Mission

What is called to achieve ACMI SpA today and in the future.

ACMI SpA wants to be for its Customers, employees and shareholders, a business model capable of innovation in its industry (packaging systems in the beverage & food sector), strong locally rooted.

To be the best represents for ACMI SpA a pride and trust pattern for:

- Customers, since they receive quality products and services that satisfy their expectations;
- women and men working in the Company, because they are the makers of achieved results, built with their expertise, involvement and passion;
- shareholders, because they are confident that the economic value of the Company continues to be renewed in accordance with the principles of social responsibility;
- the local territory, because ACMI SpA Factories represent an economic, social and environmental richness to promote for a sustainable future;
- suppliers, aiming to be key links in the value chain and partners for a common growth.

Ethical values

Values are the principles in in which we recognize.

Integrity

Proud to be a Group of correct and loyal people.

ACMI SpA is a Company where legality, fairness, honesty, equity and impartiality of behaviors inside and outside the firm are a common way of feeling and acting. In the sharing of these principles lasting relationships with Customers and suppliers are established, together with transparency in relations with third parties, and fair visibility of the contribution of each worker.

Transparency

To be sincere, and clear to everyone.

ACMI SpA is committed to provide to all its stakeholders information about actions taken in all corporate levels in a clear, comprehensive and timely manner. For ACMI SpA transparency means to employ open management methods allowing the dialogue with stakeholders, to meet the needs of information and knowledge being the economic, social and environmental base for business activities.

Personal Responsibility

Committed together for the good of the Company.

Working in ACMI SpA involves a commitment to establish a relationship of trust with colleagues and, more generally, with all stakeholders. It is considered essential to engage with loyalty and effectiveness to achieve the business objectives, aware of its duties and responsibilities.

Consistency

We are doing what we say.

To be consistent represents for everyone the commitment of every day and of every action for the mission, the values and the operating principles of the Company. Values are considered to be the foundation base of strategic planning, objectives and operational management.

Operating Principles for the Company

Action Lines used by ACMI SpA to reach strategic targets.

Building values for social and environmental responsibility

Lasting for a lifetime in order to build a better world for people of tomorrow.

ACMI SpA combines economic and social values with the aim to satisfy for long time the needs of each stakeholder: employees, Customers, shareholders, suppliers, institutions and local communities. ACMI SpA pursues a responsible management of natural resources and the use of solutions that reduce the environmental impact of industrial activities.

Quality and excellence of service

To be focused on the Customer.

The Customer satisfaction represents a fundamental element for the growth of the Company, aiming to be seen as a provider of solutions, able to understand particular needs and to offer high quality products and services.

Efficiency

To exploit available resources avoiding waste.

ACMI SpA wants to pursue aiming targets introducing optimization at each level of the activities, starting from the management of Human Resources to the exploitation of available time, budget and knowledge.

Innovation and continuous improvement

To be part of a team generating ideas to make things better.

ACMI SpA wants to introduce in all organization layers all the aspects of innovation that must be useful and possible. Innovation can be technological, organizational, about management or process.

ACMI SpA wants to work every day for the concrete improvement of its activities and products, supporting and promoting an attitude of changing.

Engagement and development

Share knowledge to improve themselves and improve.

ACMI SpA is committed to enhance the experience and develop the skills of all workers, to promote cooperation and exchange of knowledge, so that work becomes a source of satisfaction, pride for the people, as well as relevant factor for the success of the Company.

Chapter 1 - Principles and General Addresses

Recipients of the Code and principles of operation

1. Recipients of the Code

The recipients of the Code are those who for various reasons and with different responsibilities realize, directly and indirectly, ACMI SpA targets.

2. Ethical values of the Company

ACMI SpA adopts as ethical values:

- integrity;
- transparency;
- personal responsibility;
- consistency.

3. Principles of operation of the Company

ACMI SpA adopts as principles of operations:

- value creation and corporate social responsibility;
- quality and excellence of product and service;
- efficiency;
- innovation and continuous improvement;
- involvement and enhancement.

4. Definition of ethical behavior

Ethical behavior is the way of acting of the subjects in the organization, consistent with the value system.

5. Respect of Ethical Code

Directors, employees and collaborators of ACMI SpA base relationships on trust. They inspire everyday behavior to comply with the rules contained in this Code. Any behavior not consistent with this Code consists in a violation of the fiduciary pact and therefore must be detected and reported.

6. Responsibility and decision-making power

For ACMI SpA the Company represents the place of responsibility. The responsibility of each is greater the more are high the authority and discretion in their choices. Consequently, diffusion and implementation of this Code depends on the commitment of everyone, especially by those who hold the highest decision-making power and whose behavior is recognized as sample value.

7. Commitment to dialogue

ACMI SpA establishes a dialogue with its stakeholders and their representatives, while respecting their mutual interests. Everyone is required to give feedback to requests for dialogue.

8. Confidentiality of informations and potential conflicts of interest

Any information on the business not yet public that directors, employees, and collaborators could manage according to their respective assignments, is confidential and for the exclusive interest of the Company.

Directors, employees and collaborators must avoid situations that could involve a conflict of interest between them and the Company.

9. Physical and ethic integrity protection

ACMI SpA protects the physical and ethical integrity of employees and collaborators, ensuring a safe working environment AND healthy working conditions that respect individual dignity. ACMI SpA is committed to ensuring from suppliers the same respect towards their employees and contractors.

10. Value of training

ACMI SpA recognizes the importance of training as a central factor in increasing the Company's value and competence of employees.

11. Importance of communication and collaboration

ACMI SpA recognizes the value of communication as an essential factor for the sharing and exchange of expertise and to increase the sense of belonging to the Company.

ACMI SpA recognizes the fundamental importance of collaboration between workers and between different organizational structures, which is based on constant attention to meeting needs of internal and external Customers.

12. Confidentiality of personal data and respect for privacy

ACMI SpA ensures the confidentiality of personal data. Directors, employees and collaborators are required to use data only for purposes related to the exercise of the respective task, observing safety measures taken. ACMI SpA guarantees the respect of the privacy of the persons.

13. Care of environment

ACMI SpA manages its business respecting environment. The Company is committed to use most appropriate technologies for preventing environmental risks, to reduce direct and indirect environmental impacts.

14. Code condivision

ACMI SpA requires all those who collaborate with the business operations to conform their behavior to those described in this Code.

Chapter 2 - Relations with Customers

1. Impartiality between Customers

In service delivery ACMI SpA ensures fair treatment between actual and potential Customers. ACMI SpA strives to achieve the highest possible level of product / service in all its areas of competence, in line with the different territorial features and with local standards.

2. Attention to Customer needs

ACMI SpA builds the Customer relationship to availability, respect, courtesy, participation and is committed to Customer satisfaction. Recognizing value of listening and dialogue, chooses tools and channels aimed to ensure timeliness and quality of information and communication.

3. Information and communication to Customers

ACMI SpA is committed to inform the Customer completely and timely on features, functions, costs and risks of product/service offered. In particular communications, contracts, documents and any other information released by the Company will be:

- clear and simple;
- complete and truthful;
- respectful of privacy.

ACMI SpA aims to simplify procedures by a limitation of fulfillments to Customers as well as to provide them any information requested.

4. Quality and safety of product and service

ACMI SpA guarantees to Customers adequate quality standards (according to the Quality Management System certified from LRQA) and safety (in compliance with applicable regulations at national and international level and to its Risk Assessment Document).

5. Management and communication of quality of product/service

ACMI SpA is committed to communicate quality indicators as part of its Quality Management System to all the functions directly involved.

ACMI SpA is committed to:

- adopt quality management systems and define specific targets and programs of improvement of the product/service;
- promote awareness and training about product/service quality;
- communicate to Customers the rules for send complaints and provide adequate responses to the complaints received.

6. Quality perceived from the Customer

ACMI SpA is committed to adopt tools for monitoring and evaluation of Customer satisfaction by publishing each year data and information on the perceived quality, which are the basis for undertaking actions for improvement, during the Review of the Quality Management System.

7. Fairness in contracts and business relations

ACMI SpA, aware of differences between markets in which it operates, ensures fairness in contracts and business relationships.

ACMI SpA is committed to ensure that agents and overseas offices conform their behavior to the same rules of fairness that ACMI SpA adopts towards Customers.

8. Confidentiality in data management

ACMI SpA guarantees that processing of personal Customer data is done in compliance with local regulations and with this Code. ACMI SpA also ensures that data and informations are recorded and processed completely, timely and in compliance with confidentiality.

9. Prevention of contentious

ACMI SpA promotes dialogue and collaboration with Customers and the resolution in non-judicial way of possible conflicts, supporting conciliation procedures to prevent legal disputes between Company and Customer.

Chapter 3 – Relations with Employees and Collaborators

1. Definition of employee and collaborator

It is defined as employees and/or collaborator a person who, beyond the legal characterization of the role, entertain with ACMI SpA a direct working relationship, finalized to the achievement of the corporate targets.

2. Persons defence and equal opportunities

ACMI SpA avoids any form of discrimination related to physical condition, disability, opinions, national origin, religion, gender, sexual orientation and gender identity, or any other condition that could give rise to discrimination.

To the staff are only required information useful in establishing requirements for professional qualifications and working, while respecting privacy.

3. Development of human resources

ACMI SpA provides a work environment suitable to work together expressing professional attitudes, where agreed rules are respected and promoted. The Company enhances skills, potentiality and commitment, using clear and uniform evaluation criteria.

4. Training

ACMI SpA establish and implement an annual training plan, combining Company's growth needs with training needs and providing the appropriate tools for professional updating and development.

5. Time management

All those who have responsibilities are required to enhance the employees working time, which require performances consistent with their duties and with the Company's needs. All workers have a duty to pursue the maximum efficiency of the organization in use of time.

6. Abuse of authority

The superior does not require its employees personal favors or any other conduct external to the work contract and the Code rules.

7. Involvement of employees and collaborators

ACMI SpA, starting from managers, promotes a work environment based on information and on personal involvement.

In particular:

- clearly defines business roles;
- requires the contribution of all professionals roles to solve problems, particularly for roles in Customer contact;
- organizes meetings / regular communications for sharing of corporate targets;
- develop appropriate business communication tools.

8. Protection of health and safety

ACMI SpA is committed to spread and consolidate between employees and collaborators a culture of safety, developing risk awareness and promoting responsible behavior.

ACMI SpA it is committed to:

- comply with standards and applicable national and international laws and with the Risk Assessment;
- define specific objectives and improvement programs aimed at minimizing of accidents and occupational diseases.

9. Efficiency in use of corporate resources

Every employee is required to work with diligence and efficiency to protect and enhance the Company's resources, ensuring their consistent use with the Company's interest.

10. Conflict of interest

All employees and collaborators must avoid situations in which conflicts of interest could arise. They also must avoid to obtain personal advantages from position and information related to its function.

All employees and collaborators are required to report to their superiors potential situations of conflict of interest in which they can be involved.

11. Protection of image and reputation of the Company

The image and reputation of ACMI SpA represents an heritage that employees and collaborators must protect with their behavior in every situation, taking into account the evolving social context, technology and new available tools.

12. Relations between colleagues and attention to the privacy

Every employee and collaborator is called to assume an attitude of respect and protection of the dignity of the person, partnership and solidarity towards their colleagues.

ACMI SpA respects the privacy of its employees and collaborators, also pay attention to their needs in difficult situations that may impede the normal performance of their duties.

Chapter 4 - Relations with Shareholders and Financial Market

1. Creation of value

ACMI SpA is committed to create value for its shareholders, with an effective control of business risks, a socially responsible management, a safe and efficient use of capital and the safeguarding of Company assets. ACMI SpA is aware of the importance of establishing with shareholders a relationship based on trust, with behavior based on transparency and a continuous, timely and clear communication.

2. Safeguard of shareholders

ACMI SpA adopts a government and management system aimed at ensuring the protection and performance for all shareholders funds, as provided by law and international best practices.

3. Informations price sensitive

ACMI SpA adopts an internal control and management system oriented to ensure the accuracy and truthfulness of corporate communications, in order to prevent corporate crimes affecting interests of shareholders.

4. Participation and equality of shareholders

ACMI SpA is committed to establish a constant relationship with its shareholders, both through its web site, and by promoting direct meetings, besides those required by law.

ACMI SpA guarantees equal information and treatment of all shareholders and the protection of its own interests.

5. Insider Trading

Directors, employees and collaborators of ACMI SpA, which depending on the role have access to price sensitive information not available to the public, will not exploit or spread within and outside the Company.

Chapter 5 - Relations with Suppliers

1. Definition of Supplier

The suppliers are the people and companies that provide goods, services and resources necessary for the realization of products and provision of services, contributing to the achievement of ACMI SpA targets. All suppliers are called to adopt the purposes and principles of this Code, which is made available to suppliers through . 

2. Relationships with suppliers

The conduct of ACMI SpA during procurement of goods and services is marked by the pursuit of quality, cost and the recognition of equal opportunities for all suppliers.

ACMI SpA is committed to developing cooperative relationships with suppliers based on a communication addressed to the mutual exchange of expertise and information, and will promote the creation of shared value.

3. Safeguard of health and safety of suppliers

ACMI SpA undertakes to preserve, as required by contracts, health and safety of workers in companies involved in their supplies. ACMI SpA ensures that the requirements of these companies correspond to those required by procedures and by the corporate qualification systems.

4. Criteria for selection and qualification of suppliers

Criteria for selection and qualification of suppliers are based on fairness and equity. The selection is based on evaluation of quality and cost performance, technical and professional standards, environmental and social responsibility, according to the rules issued from specific regulations, procedures and certifications. The  of this Code by supplier is one of the selection criteria and becomes an integral part of the contractual 

5. Fairness in management and reformulation of contracts

The management of contracts with suppliers is founded on fairness, avoiding all possible forms of abuse.

This means that ACMI SpA:

- informs completely - when signing the contract - on the modalities and timing of payment;
- using a complete information, clear and understandable, avoiding clauses that could have an ambiguous interpretation;
- avoids to take advantage of its position in case of a renegotiation of the contract, especially in relation to small suppliers.

6. Gift and benefits

ACMI SpA avoids gifts and benefits that can be interpreted as exceeding normal commercial practices, finalized to obtain favorable treatment.

Chapter 6 - Relations with Territory, Communities and Institutions

1. Relationships with environment

ACMI SpA manages its business by pursuing environmental protection with the continuous improvement of its performance in relation to the environmental impacts of its activities.

ACMI SpA is committed to:

- work towards prevention of environmental risks;
- internally promote environmental awareness and spread of eco-efficient technologies;
- evaluate the environmental impact of its activities through the periodic calculation of the Company's Carbon Footprint.

2. Relationships with Institutions

ACMI SpA develops with institutions relationships of cooperation and communication that only applies to:

- regulatory and administrative activities relating to the business;
- environmental protection;
- risk prevention.

Directors, employees and collaborators act towards Institutions with full integrity.

3. Relationships with Authorities and Communities

ACMI SpA is committed to provide to national and local authorities all necessary information required in a complete, correct, adequate and timely manner.

ACMI SpA is committed to pay attention to the life of communities in which it operates and to listen to any request from them.

4. Support for social and cultural initiatives

In support of social and cultural initiatives and generally in sponsorships, ACMI SpA takes into account only initiatives consistent with its strategic objectives, principles of environmental and social responsibility, guidelines adopted by the Board of Directors. ACMI SpA does not make contributions of any kind to political parties and candidates in the elections and shall refrain from any form of undue pressure from public representatives, designed to provide business benefits.

Chapter 7 – Code Execution

1. Spread and implementation of the Code

Spread and implementation of this Code are responsibility of the Human Resources Sector (hereinafter referred to as HR). HR, who is directly or indirectly aware of violations of the Code, may decide whether to proceed with the opening of a special procedure.

2. Procedures for reporting from third parties

Reports of violations can be advanced to HR verbally or writing. In the case where HR resolves to the initiation of a procedure, it will be registered in the appropriate protocol and identified by a name and a number.

Who presents a complaint has the right to be informed, within 30 days from the presentation, of the HR decision to initiate proceedings or file the complaint.

In the case of initiation of a proceeding, HR has 60 days to pass a resolution about. HR must communicate to the presenter of the complaint the result of his judgment. Any proceedings will be periodically reported to the Board of Directors.

Reports and request on information about Ethical Code could be addressed to:

Ufficio Risorse Umane

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