



# CODE OF ETHICS



**ACMI SpA**  
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Italia



# INTRODUCTION

The Code of Ethics is one of the tools of corporate social responsibility for the promotion of good behavioural practices.

ACMI SpA's Code of Ethics represents the development of company principles, in part already expressed in the Quality Policy, Environmental Policy and Social Responsibility Policy, and was issued for the first time in 2017 to express these principles in a more complete and exhaustive manner with the aim of defining criteria of conduct that are shared as much as possible within the company.

This issue of the ACMI SpA Code of Ethics has been approved by the Management.

The Code requires that it be reviewed in light of the experiences and changes that have affected its protagonists, i.e., the company and its interlocutors.

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# WHAT IS THE CODE OF ETHICS FOR?

The Code of Ethics is one of the tools of corporate social responsibility for the promotion of good behavioural practices for those who work in ACMI SpA and for those who have an interest in pursuing its mission.

The Code of Ethics serves, first of all, to model the behaviour of the people who work in ACMI SpA and for ACMI SpA, but it also intends to pursue other objectives:

- the increase of internal cohesion and consistency. The Code of Ethics aims to improve internal relations and to form a unified and clear external image;
- maximum efficiency. The motivation of workers towards positive goals increases the ability to produce both for those directly involved and for the reference environment;
- a good reputation. An organisation with good rules and which manifests its values produces security in its customers and suppliers who can thus be transformed from interlocutors to partners.



# MISSION

ACMI SpA wants to be a business model with strong territorial roots and a strong vocation for innovation for its customers, workers and shareholders.

For ACMI SpA, being a leader on the market means representing a source of pride for:

- the customers, so that they receive quality products and services that meet their expectations;
- the women and men who work in the company, so that they are protagonists of the results through their skills, their involvement and their passion;
- the shareholders, so that they are certain that the economic value of the company continues to be generated in compliance with the principles of social responsibility;
- the territory or reference, so that it is the economic, social and environmental wealth to be promoted for a sustainable future;
- the suppliers, so that they are protagonists of the value chain and growth partners.



# VALUES

Values are the principles in which we recognise ourselves.



## INTEGRITY

Proud to be a group of fair and loyal people.

ACMI SpA is a company in which legality, fairness, honesty, equity and impartiality of behaviour inside and outside the company constitute a common way of feeling and acting. Sharing these principles establishes lasting relationships with customers and suppliers, transparency in relationships with third parties and fair recognition of the work of collaborators.



## TRANSPARENCY

Sincere and clear to all its interlocutors.

ACMI SpA undertakes to provide all its interlocutors with clear, complete and timely information on the actions carried out at all levels. For ACMI SpA, being transparent means adopting management tools that promote dialogue with interlocutors, with the aim of meeting expectations in terms of information and knowledge of the economic, social and environmental impact of the company's activities.



## → PERSONAL RESPONSIBILITY

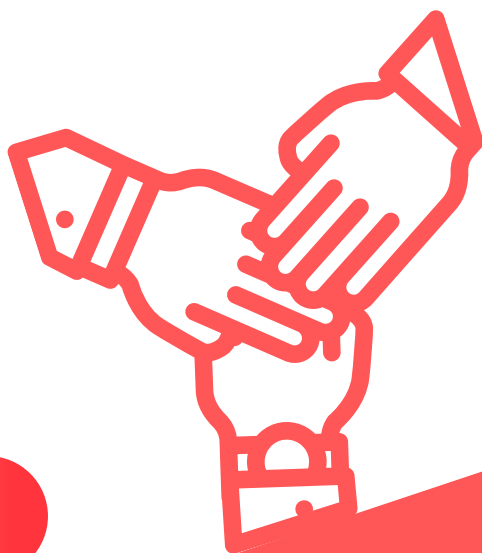
Committed together for the good of the company.

Working at ACMI SpA involves the commitment to establish a relationship of trust with one's colleagues and, more generally, with all interlocutors. It is considered essential to commit oneself loyally and effectively.

## → CONSISTENCY

Staying focused on daily action.

Being consistent means committing to implementing the company's mission, values and operating principles on a daily basis and in every action. They are considered the foundation for strategic planning, objectives and operational management.



# OPERATING PRINCIPLES OF THE COMPANY

The operating principles represent the lines of conduct that ACMI SpA intends to follow to achieve its strategic objectives.



## CREATION OF VALUE AND SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

Being a company managed to last over time and to improve society and the environment while also thinking about future generations.

ACMI SpA is committed to combining economic and social value with the aim of satisfying over time the legitimate expectations of all those with whom it enters into relationships: customers, workers, shareholders, suppliers, institutions and local communities. ACMI SpA pursues responsible management of natural resources and promotes the use of solutions aimed at reducing the environmental impact of its activities.



## QUALITY AND EXCELLENCE OF SERVICE

Being focused on the customer.

Customer satisfaction represents a fundamental element for the growth and success of the company that wants to be perceived as a supplier of innovative solutions, capable of understanding needs and offering high-quality products and services.





## EFFICIENCY

Valorising and not wasting available resources.

ACMI SpA is committed to pursuing its objectives efficiently and effectively by introducing the principle of optimisation into every activity: in the management of human resources, in the management of time and in the management of financial and technological resources.



## INNOVATION AND CONTINUOUS IMPROVEMENT

Feeling part of a team that generates ideas and improves things.

ACMI SpA aims to introduce all aspects of “useful and possible” innovation at the different organisational levels: technological, organisational, management and process. The company intends to act every day for the concrete improvement of its activities and products, supporting and promoting the attitude to change and continuous improvement.



## INVOLVEMENT AND VALORISATION

Sharing knowledge to improve and improve oneself.

ACMI SpA is committed to valorising experience, developing the skills of all workers, promoting co-operation and the exchange of knowledge so that work is a source of satisfaction for people as well as a significant factor for the success of the company.

# CHAPTER 1

## GENERAL PRINCIPLES AND GUIDELINES

### 1. RECIPIENTS OF THE CODE

The recipients of the Code are all those who, in various capacities and with different responsibilities, directly or indirectly achieve the corporate objectives.

### 2. ETHICAL VALUES OF THE COMPANY

ACMI SpA considers the following values as its own:

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

### 3. OPERATING PRINCIPLES OF THE COMPANY

ACMI SpA adopts the following operating principles as its own:

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

### 4. DEFINITION OF ETHICAL BEHAVIOUR

Ethical behaviour is defined as the way of acting of the subjects who are part of the organisation consistently with the identified value system.

## 5. COMPLIANCE WITH THE CODE OF ETHICS

Directors, employees and collaborators of ACMI SpA base their relationships on trust. To this end, their daily conduct shall be inspired by compliance with the rules contained in this Code of Ethics. Any behaviour that does not comply with the Code of Ethics constitutes a violation of the fiduciary agreement and, therefore, must be detected and reported.

## 6. RESPONSIBILITY AND DECISION-MAKING POWER

ACMI SpA interprets the company as a place of responsibility. The responsibility of each individual is all the greater the higher the authority they are invested with and the discretion they have. The implementation of this Code, therefore, depends on the commitment of everyone, but in particular on those who hold the greatest decision-making power and whose behaviour is recognised as an example.

## 7. COMMITMENT TO DIALOGUE

ACMI SpA establishes a dialogue with its interlocutors and their representatives in respect of mutual interests. Everyone is required to respond to requests for dialogue.

## 8. CONFIDENTIALITY OF INFORMATION AND POTENTIAL CONFLICTS OF INTEREST

All information on company activities not yet made public that is available to the directors, employees and collaborators of ACMI SpA is to be considered confidential and must be used in the exclusive interest of the company. Directors, employees and collaborators must avoid situations that may represent a conflict of interest between them and the company.

## 9. PROTECTION OF PHYSICAL AND MORAL INTEGRITY

ACMI SpA protects the physical and moral integrity of employees and collaborators, ensuring safe working environments and working conditions that respect individual dignity. ACMI SpA is committed to ensuring that its suppliers show the same respect towards their employees and collaborators.

## 10. VALUE OF TRAINING

ACMI SpA recognises the importance of training as an indispensable factor for increasing the value of the company and the competence of its employees.

## 11. IMPORTANCE OF COMMUNICATION AND COLLABORATION

ACMI SpA recognises the value of communication as an indispensable factor for sharing and exchanging skills and for increasing the sense of belonging to the company.

ACMI SpA recognises the fundamental value of collaboration between workers and different organisational structures in order to respond satisfactorily to the needs of both internal and external customers.



## 12. CONFIDENTIALITY OF PERSONAL DATA AND RESPECT FOR THE PRIVATE SPHERE

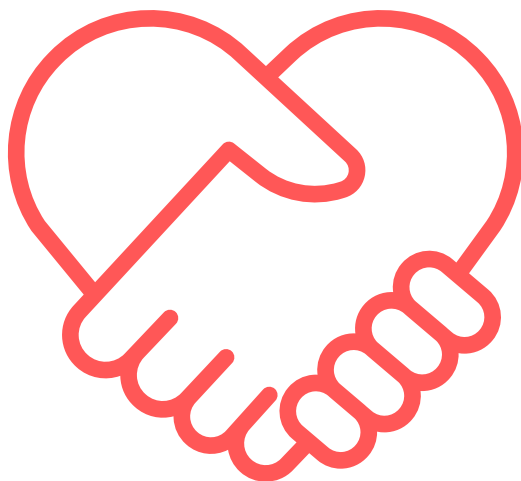
ACMI SpA ensures the confidentiality of the personal data in its possession. Directors, employees and collaborators are required to use the data exclusively for purposes related to the exercise of their duties while observing the security measures adopted. ACMI SpA guarantees respect for people's private sphere.

## 13. CARING FOR THE ENVIRONMENT

ACMI SpA manages its activities while respecting the environment. To this end, it undertakes to use the most suitable technologies to prevent environmental risks and reduce environmental impact (direct and indirect).

## 14. SHARING THE CODE

ACMI SpA requires all those who collaborate in various capacities in company activities to conform their behaviour to that described in this Code of Ethics.



# CHAPTER 2

## RELATIONSHIPS WITH CUSTOMERS

### 1. IMPARTIALITY AMONG CUSTOMERS

In providing services, ACMI SpA guarantees fair treatment between actual and potential customers. ACMI SpA works to achieve the highest possible level of product/service in all its areas of expertise, compatibly with the different territorial characteristics and local regulations.

### 2. ATTENTION TO CUSTOMER NEEDS

ACMI SpA bases its relationship with customers on availability, respect, courtesy and participation and is committed to their satisfaction. It establishes tools and channels aimed at ensuring timeliness and quality in the communication of information to customers.

### 3. INFORMATION AND COMMUNICATION TO CUSTOMERS

ACMI SpA undertakes to inform the customer in a complete and timely manner on the characteristics, functions, costs and risks of the product/service offered. Communications, contracts, documents and any other information issued by the company must be:

- clear and simple;
- complete and truthful;
- respectful of the provisions regarding the protection of privacy.

ACMI SpA is committed to simplifying procedures in the interest of the customer and is committed to always offering maximum availability in response to any request for clarification.

#### 4. QUALITY AND SAFETY OF THE PRODUCT/SERVICE

ACMI SpA guarantees its customers adequate quality standards for the products/services offered (in accordance with its management system certified by LRQA Italy) and safety (in compliance with applicable national and international regulations and its own Risk Assessment Document).

#### 5. MANAGEMENT AND COMMUNICATION OF PRODUCT/SERVICE QUALITY

ACMI SpA undertakes to disseminate the qualitative indicators to all functions directly involved, as part of its Quality Management System. To this end, it undertakes to:

- adopt quality management systems, define specific objectives and product/service improvement programs;
- promote awareness and training activities regarding the quality of the product/service;
- inform customers of how to make complaints and provide adequate responses to the complaints themselves.

#### 6. QUALITY PERCEIVED BY THE CUSTOMER

ACMI SpA undertakes to adopt tools for monitoring and evaluating customer satisfaction by publishing, on an annual basis, data and information on perceived quality that will form the basis for undertaking improvement actions during the Review of its Quality Management System.



## 7. FAIRNESS IN CONTRACTS AND BUSINESS RELATIONSHIPS

ACMI SpA is aware of the differences between the markets in which it operates and guarantees fairness in contracts and business relationships. The company undertakes to ensure that its agents and its foreign offices conform their behaviour to the same rules of fairness that ACMI SpA adopts towards its customers.

## 8. CONFIDENTIALITY IN DATA MANAGEMENT

ACMI SpA guarantees that customers' personal data are processed in compliance with current legislation and this Code of Ethics.

## 9. PREVENTION OF LITIGATION

ACMI SpA encourages dialogue and collaboration with customers and favours the non-judicial resolution of possible disputes, promoting conciliation procedures to prevent legal disputes between the company and the customer.





# CHAPTER 3

## RELATIONSHIPS WITH EMPLOYEES AND COLLABORATORS

### 1. DEFINITIONS OF EMPLOYEE AND COLLABORATOR

For the purposes of this Code of Ethics, an employee and/or collaborator is defined as a person who, irrespective of the legal qualification of the relationship, has a direct working relationship with ACMI SpA aimed at achieving the company's objectives.

### 2. PROTECTION OF THE PERSON AND EQUAL OPPORTUNITIES

ACMI SpA avoids any form of discrimination referring to physical condition, disability, opinions, nationality, religion, sex, sexual orientation and gender identity, or any other condition that may give rise to discrimination. Staff are asked for information useful exclusively for ascertaining their professional and work requirements in full respect of their private sphere.

### 3. VALORISATION OF HUMAN RESOURCES

ACMI SpA guarantees a working environment where everyone can collaborate by expressing their professional aptitude and where shared rules are respected and promoted. The company, in the employment relationship, valorises skills, potential and commitment by using clear and homogeneous evaluation criteria.

#### 4. TRAINING

ACMI SpA develops and implements a training plan for its workers on an annual basis, combining company growth needs with training needs and making available the right tools for professional updating and development.

#### 5. TIME MANAGEMENT

All those with responsibilities are required to valorise the working time of collaborators, from whom they can only request services consistent with the performance of their duties and the needs of the company. Likewise, all workers have the duty to pursue, in the use of their time, the maximum efficiency of the organisation.

#### 6. ABUSE OF AUTHORITY

The hierarchical superior will not request personal favours from collaborators or engage in conduct not provided for in employment contracts and the rules of this Code of Ethics.

#### 7. INVOLVEMENT OF EMPLOYEES AND COLLABORATORS

ACMI SpA, starting from the managers, promotes a work environment based on the sharing of information and the involvement of staff. In particular:

- clearly defines company roles;
- solicits the contribution of all professional figures in resolving problems with particular attention to those who work in contact with the customer;
- organises meetings and sends periodic communications to share company objectives;
- develops appropriate corporate communication tools.



## 8. SAFETY AND HEALTH PROTECTION

ACMI SpA is committed to spreading and consolidating the culture of safety among employees and collaborators by developing awareness of risks and promoting responsible behaviour.

To this end, it undertakes to:

- comply with the requirements dictated by national and international standards and laws and its own Risk Assessment Document;
- define specific objectives and improvement programs aimed at minimising accidents and occupational diseases.

## 9. DILIGENCE AND EFFICIENCY IN THE USE OF COMPANY RESOURCES

Each ACMI SpA employee is required to operate with the diligence and efficiency necessary to protect and valorise company resources by using them in the company's interest.

## 10. CONFLICT OF INTEREST

All employees and collaborators must avoid situations in which conflicts of interest may arise. Likewise, they must refrain from taking personal advantage of the position and information connected with their function. All employees and collaborators are obliged to report to their direct superiors any potential situations of conflict of interest in which they may be involved.



## 11. PROTECTION OF CORPORATE IMAGE AND REPUTATION

The image and reputation of ACMI SpA represent an asset that employees and collaborators must always protect through their behaviour, also taking into consideration the evolution of the social context, technology and new communication tools.

## 12. RELATIONSHIP BETWEEN COLLEAGUES AND ATTENTION TO THE EMPLOYEE'S PRIVATE SPHERE

Every employee and collaborator is called upon to adopt an attitude based on respect, protection of the dignity of the person, collaboration and solidarity towards their colleagues. ACMI SpA respects the private sphere of its employees and collaborators, identifying, where necessary, the most suitable ways of responding to the needs arising from difficult situations that may impede the normal performance of work activities.



# CHAPTER 4

## RELATIONSHIPS WITH SHAREHOLDERS AND THE FINANCIAL MARKET

### 1. CREATION OF VALUE

ACMI SpA is committed to creating value for its shareholders through effective control of corporate risks, socially responsible management, safe and efficient use of capital and the safeguarding of corporate assets. ACMI SpA is aware of the importance of establishing a relationship of trust with shareholders through behaviour inspired by transparency and a clear and timely communication system.

### 2. PROTECTION OF SHAREHOLDERS

ACMI SpA adopts a governance and management system aimed at guaranteeing the protection and return on capital of all shareholders in accordance with the provisions of the law and international best practices.

### 3. PRICE-SENSITIVE INFORMATION

ACMI SpA adopts an internal control and management system aimed at guaranteeing the truthfulness and correctness of corporate communications in order to prevent corporate crimes that harm the interests of shareholders.

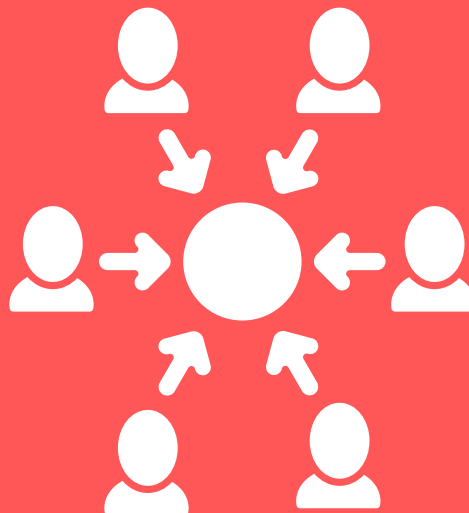


#### 4. PARTICIPATION AND EQUAL TREATMENT OF SHAREHOLDERS

ACMI SpA is committed to establishing a constant relationship with its shareholders both through its website and by promoting direct meetings, in addition to those required by law. ACMI SpA also guarantees equal treatment of all shareholders and protects its own interests and those of shareholders as a whole.

#### 5. ABUSE RESULTING FROM PRIVILEGED INFORMATION

The directors, employees and collaborators of ACMI SpA who, depending on the role held, have access to price-sensitive information, not available to the public, will not exploit it or disseminate it inside or outside the company.



# CHAPTER 5

## RELATIONSHIPS WITH SUPPLIERS

### 1. DEFINITION OF SUPPLIER

Suppliers are the people, organisations and companies that, in various capacities, provide goods, services, performances and resources necessary to achieve ACMI SpA's objectives. All these subjects are required to adopt the aims and principles reported in this Code of Ethics.

### 2. RELATIONSHIP WITH SUPPLIERS

ACMI SpA's conduct in the procurement phases of goods and services is based on the search for quality at the best price and the recognition of equal opportunities for each supplier. ACMI SpA undertakes to develop co-operative relationships with suppliers based on communication aimed at the mutual exchange of knowledge, skills and information that favour the creation of common value.

### 3. PROTECTION OF SAFETY AND HEALTH OF SUPPLIERS

ACMI SpA undertakes to ensure, in the form and manner provided for in the contracts, that the health and safety of the workers of the companies involved in its supplies is preserved. ACMI SpA ensures that the requirements of these companies correspond to those required by the company procedures and qualification systems.



#### 4. SUPPLIER SELECTION AND QUALIFICATION CRITERIA

The supplier selection and qualification criteria are based on fairness and equity. The selection is based on the assessment of the quality and cost-effectiveness of the services, technical and professional suitability, respect for the environment and social responsibility according to the rules dictated by specific regulations, procedures and certifications.

#### 5. FAIRNESS IN CONTRACT MANAGEMENT AND REFORMULATION

The management of contracts with suppliers is based on fairness, avoiding any possible form of abuse. This means that ACMI SpA:

- provides exhaustive information, when the contract is stipulated, on payment methods and times;
- uses complete, clear and comprehensible information, avoiding clauses that do not allow an unambiguous interpretation;
- avoids exploiting its position in the event that eventualities arise that imply a renegotiation of the contract, especially with small suppliers.

#### 6. GIFTS AND BENEFITS

ACMI SpA opposes any giving and/or receiving of gifts that could even be interpreted as exceeding normal commercial courtesy practices or in any case aimed at obtaining preferential treatment.



# CHAPTER 6

## RELATIONSHIPS WITH THE TERRITORY, COMMUNITIES`AND INSTITUTIONS

### 1. RELATIONSHIPS WITH THE ENVIRONMENT

ACMI SpA manages its activities pursuing the goal of environmental protection through the continuous improvement of its processes. To this end, it undertakes to:

- operate for the prevention of environmental risks;
- promote environmental awareness activities internally and promote the diffusion of eco-efficient technologies;
- account for the environmental impact of its activities.

### 2. RELATIONSHIPS WITH INSTITUTIONS

ACMI SpA develops collaboration and communication relationships with institutions regarding exclusively:

- regulatory and administrative activity relating to company activities;
- environmental protection;
- risk prevention.

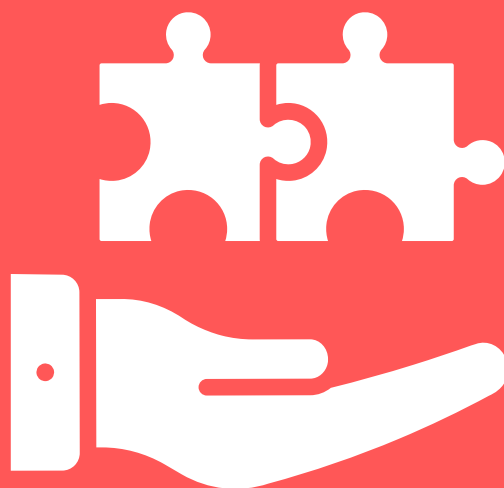
The directors, employees and collaborators act towards the institutions with full integrity.

### 3. RELATIONSHIPS WITH REGULATORY AUTHORITIES AND COMMUNITIES

ACMI SpA undertakes to provide national and local authorities with all the information requested in a complete, correct, adequate and timely manner. ACMI SpA also undertakes to pay attention to the life of the community in which it operates and to listen to their requests.

### 4. SUPPORT FOR SOCIAL AND CULTURAL INITIATIVES

ACMI SpA, in supporting social and cultural initiatives and, in general, in sponsorships, only takes into consideration initiatives that are consistent with its strategic objectives, with the principles of environmental and social responsibility, and with the guidelines adopted by the Board of Directors. ACMI SpA does not make contributions of any kind to political parties or election candidates and abstains from any undue form of pressure towards public representatives aimed at obtaining advantages for the company.



# CHAPTER 7

## IMPLEMENTATION OF THE CODE

### 1. DISSEMINATION AND IMPLEMENTATION OF THE CODE

ACMI SpA undertakes to disseminate and implement this Code by assigning adequate internal resources. If it becomes directly or indirectly aware of violations of the Code, it will be able to assess whether to proceed with the opening of a specific procedure.

### 2. PROCEDURES FOLLOWING THIRD-PARTY REPORTING

ACMI SpA has equipped itself with an internal reporting system in compliance with the provisions of Legislative Decree no. 24 of 10 March 2023 (implementing EU Directive 2019/1937 on the protection of persons who report breaches of Union Law).

In particular, in compliance with the provisions of the Legislative Decree, the following may be reported by employees of ACMI SpA and persons who, for various reasons, maintain relationships with the same company (by way of example and not limited to: consultants, suppliers of goods and services, agents, contractors, business partners, shareholders, interns, volunteers):

- breach of European Union law;
- administrative, accounting, civil or criminal offences;
- violations of the Code of Ethics and Conduct of ACMI SpA;
- alleged or ascertained violations of ACMI SpA's procedures or, in any case, of the internal regulatory system;
- Environmental, Social & Governance violations.

Reports can be made through a specific platform accessible at the following address which guarantees the confidentiality of the whistleblower's identity and the information contained in the report through encryption systems:

<https://acmispa.wallbreakers.it/>

The instructions for reporting can be found at the following link:

<https://bit.ly/3RRx5OK>

## 2.1 CONFIDENTIALITY AND PROTECTION OF WHISTLEBLOWERS

ACMI SpA guarantees the utmost confidentiality to all reports received and undertakes to protect whistleblowers from any form of retaliation or discrimination. The information provided by whistleblowers will be treated confidentially and will only be accessible to people directly involved in the investigation and management of reports. The management of reports is entrusted to a consultancy company experienced in managing the obligations required by sector regulations.

Reports and requests for information can be addressed to:

ACMI SpA

Via G. Di Vittorio 60 - 43045 Fornovo (PR), Italia

[info@acmispa.com](mailto:info@acmispa.com)



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