



# Ethical Policy

The De Nigris Group is committed to conducting its activities with the highest standards of ethics, integrity, and social responsibility. We believe that ethical conduct is essential to fostering a healthy work environment, ensuring customer trust, and contributing to the well-being of the communities in which we operate.

This Ethical Policy guides the actions of all employees, managers, collaborators, and business partners, establishing the values and behaviors expected to operate responsibly and in compliance with laws and human rights.

## **1. Integrity and Transparency**

All business activities must be conducted with honesty, transparency, and fairness. We are committed to making decisions equitably, maintaining clear communication, and avoiding conflicts of interest.

No employee or business partner is permitted to gain personal or corporate advantage through deceptive or dishonest practices.

## **2. Respect for Human Rights**

The De Nigris Group is committed to respecting the fundamental rights of every individual, including the right to work, privacy, dignity, and freedom of expression.

Any form of discrimination, harassment, or abuse, including based on race, gender, religion, sexual orientation, disability, or age, is strictly prohibited. Every employee must be treated with respect and equality.

Child labor and forced labor are strictly prohibited in any form. We ensure that all hiring practices comply with international human rights standards.

## **3. Sustainability and Social Responsibility**

The De Nigris Group promotes sustainable practices, respecting the environment and committing to reducing the ecological impact of our operations.

We are aware of our responsibilities to society and invest in initiatives that support the well-being of local communities and social progress.

## **4. Compliance with Laws and Regulations**

We are committed to complying with all applicable local, national, and international laws and regulations, including those related to workplace safety, health, data privacy, and consumer protection.

Each employee is expected to be aware of and comply with the laws relevant to their role and responsibilities, and to report any violations promptly.

## **5. Anti-Corruption and Conflict of Interest Policy**

It is strictly prohibited to offer, request, or accept bribes, gifts, or any other form of payment that could compromise impartial decision-making in business activities.

Employees must avoid situations that may lead to actual or perceived conflicts of interest, whether personal or professional, and must always act in the best interests of the company.

## **6. Responsible Resource Management**

Each employee is responsible for managing company resources appropriately and using them for legitimate business purposes.

We encourage efficient resource management and respect for natural resources by minimizing waste and promoting responsible use of energy and materials.

## **7. Reporting Unethical Behavior**

Every employee is encouraged to report any behavior that violates this ethical policy, including acts of corruption, discrimination, harassment, or other unethical practices.

Reporting should be done without fear of retaliation, and the company ensures that all reports will be treated with confidentiality and respect.

## **8. Continuous Improvement and Education**

The De Nigris Group is committed to promoting a corporate culture based on ethics and continuous improvement. We invest in the ongoing training of our employees to ensure they maintain high ethical standards in every aspect of their work.

The De Nigris Group is committed to ensuring that every employee, collaborator, and business partner adheres to the principles outlined in this Ethical Policy. Our reputation is based on integrity and trust, and we are determined to do everything possible to maintain it.

This Ethical Policy is a living document, periodically reviewed and updated to address new challenges and regulatory changes. Every member of our team is encouraged to actively contribute to fostering a workplace that reflects our values and ethical goals.

Caivano, 17.01.2025

The Management