CODE OF ETHICS

Principles of Integrity, Respect for People, Social and Environmental Responsibility, and Anti-Corruption

Document	Code of Ethics – Company Self-Declaration	Rev. 00
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This Code of Ethics defines the principles and values that F.I.MA.L. S.r.l. is committed to following in the design, manufacturing, and marketing of machinery for woodworking and panel processing.

This document constitutes a corporate self-declaration of commitment and serves as a reference for employees, collaborators, suppliers, dealers, agents, consultants, business partners, and all those who have business relationships with F.I.MA.L. S.r.l.

1. Integrity, Legality, and Fairness

- Operate in full compliance with applicable laws, regulations, contracts, and obligations relating to employment, safety, the environment, and business relationships.
- Act with fairness, transparency, and good faith in relationships with customers, suppliers, partners, institutions, and other stakeholders.
- Do not tolerate unlawful or fraudulent conduct or conduct intended to obtain improper advantages.
- Avoid conflicts of interest and manage them transparently whenever they arise.

2. Anti-Corruption and Prohibited Conduct

- F.I.MA.L. adopts a zero-tolerance approach to any form of corruption, whether active or passive, direct or indirect.
- It is prohibited to offer, promise, authorize, request, or accept money, gifts, favors, travel, services, personal benefits, or anything of value for the purpose of improperly influencing a decision, obtaining a business advantage, or inducing someone to violate their duties.
- No business need, sales objective, bid, tender, customer relationship, or pressure from an intermediary can justify corrupt conduct.
- Company transactions and payments must be properly authorized, documented, traceable, and recorded completely and accurately.
- F.I.MA.L. prohibits so-called facilitation payments, meaning informal payments intended to expedite or secure routine actions by public officials. Any such request must be refused and reported to Management.

3. Dealings with Public Authorities

- In dealings with public officials, public entities, and persons exercising public functions, F.I.MA.L. requires integrity, transparency, and full compliance with applicable laws.
- It is prohibited to use intermediaries, consultants, agents, or other parties to carry out conduct that F.I.MA.L. could not lawfully undertake directly.
- Any unusual request for money, gifts, favors, travel, personal benefits, or other advantages must be promptly reported to Management.

4. Gifts, Hospitality, Sponsorships, and Donations

- Gifts and hospitality are permitted only when they are reasonable, occasional, of modest value, transparent, and consistent with customary business courtesy.
- They must never be offered or accepted with the purpose of influencing a decision, obtaining preferential treatment, or creating an improper obligation.
- Particular caution must be exercised in dealings with public officials, customers involved in procurement procedures, bids or tenders, and persons who may influence a business decision.
- Sponsorships and donations must have a legitimate purpose, be properly authorized and documented, and must not serve as an indirect means of obtaining improper advantages.

5. Relationships with Dealers, Agents, Consultants, Suppliers, and Other Third Parties

- F.I.MA.L. considers third parties an important part of its international business and requires relationships with them to be based on integrity, transparency, fairness, and traceability.
- The selection and management of dealers, agents, consultants, and partners must take into account their reputation, experience, actual role, and consistency with the principles of this Code.
- Before assigning sensitive activities to a third party, F.I.MA.L. may request information and conduct risk-proportionate checks, particularly when the third party acts on behalf of the company in dealings with public or private customers.
- Compensation, commissions, or reimbursements without a genuine business rationale, disproportionate to the activity performed, or lacking adequate documentation are not permitted.
- F.I.MA.L. does not authorize any third party to use money or other benefits to obtain orders, contracts, permits, or preferential treatment.

6. Anti-Corruption Red Flags

- Requests for cash payments or payments to accounts held by parties other than the contracting party without a valid justification.
- Requests for exceptional commissions, discounts, or compensation that are not adequately justified.
- Pressure to make urgent or advance payments outside normal contractual terms.
- Requests to use companies, intermediaries, or bank accounts in other countries without a clear business rationale.
- Unexplained preferences toward certain suppliers, agents, dealers, or partners.
- Requests for gifts, travel, money, or other personal benefits linked to bids, tenders, orders, or permits.
- Requests to alter invoices, descriptions, amounts, or documentation to misrepresent a transaction.
- Any conduct intended to circumvent internal procedures, controls, approvals, or normal decision-making processes.

7. Management of Bids, Tenders, and Business Opportunities

- When participating in bids, tenders, and selection procedures, F.I.MA.L. operates according to principles of fairness, transparency, and compliance with applicable rules.
- It is prohibited to offer or promise advantages to persons involved in the evaluation, award, or management of a bid or contract.
- It is prohibited to obtain or use confidential or unlawfully obtained information for the purpose of distorting competition or obtaining an improper advantage.
- Submitted technical, commercial, financial, and administrative documentation must be complete, accurate, and truthful.

8. Respect for People and Equal Opportunity

- Recognize the dignity, respect, and equal opportunity of every person, regardless of gender, origin, culture, religion, age, or other personal characteristics.
- Reject all forms of discrimination, harassment, intimidation, violence, or offensive conduct.
- Value skills, professionalism, merit, and individual contribution.

9. Occupational Health and Safety

- Consider the protection of people's health and safety a priority responsibility.
- Comply with safety rules and procedures and promote responsible behavior to prevent accidents and risks.
- Promote the prompt reporting of potentially hazardous conditions or behavior.

10. Environmental Responsibility and Sustainability

- Recognize the company's responsibility for environmental protection and the responsible use of resources.
- Pursue continuous improvement of company activities with the objective of reducing consumption, waste, and environmental impacts.
- Promote the recovery and reuse of materials whenever technically and economically sustainable.
- Promote solutions aimed at energy efficiency and reducing environmental impact.

11. Employee Commitment and Reporting

- All persons working for F.I.MA.L. are expected to know and comply with the principles of this Code.
- Anyone who becomes aware of, or has a reasonable suspicion of, a violation of anti-corruption or ethical principles is encouraged to report it to Management through the available company channels.
- Good-faith reports must be handled confidentially and in compliance with applicable laws. F.I.MA.L. does not tolerate retaliation against anyone who properly reports a potential violation.
- Recipients of this Code must cooperate, within their respective areas of responsibility, with any internal investigations.

12. Management Responsibility and Review

- F.I.MA.L. Management promotes a corporate culture based on integrity, respect for people, environmental responsibility, and rejection of corruption.
- Management ensures that the principles of this Code are communicated to employees and, where appropriate, to key partners and third parties.
- This Code will be reviewed periodically and updated as necessary in light of the company's development, activities, and applicable regulatory framework.

This document represents a self-declaration of corporate principles and commitments. It does not constitute certification of compliance with UNI, ISO, or other certified systems.

F.I.MA.L. S.r.l. Management

Date: September 8, 2026