



# **Code of Ethics and Conduct**



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**Document approved by the Board of Directors  
of HAWAI Italia S.r.l. on 01/03/2023**



# Code of Ethics and Conduct

## 1 INTRODUCTION

HAWAI Italia S.r.l. (or the Company), in its firm intention to guarantee maximum fairness and transparency in the management of the activities and to protect the Company's image and reputation, has drawn up this Code, which clearly defines the set of shared values, rules and principles of conduct that, since its establishment, characterise the Company's relations with personnel and third parties and characterise the carrying out of its activities.

Professional integrity, honesty and respect for commitments are behaviours that bring confidence in the company.

Violation of these values, recognised by the community and the market, any actions that are incorrect or against the Law, can cause damage to image, credibility and to the people themselves who work in HAWAI Italia S.r.l..

The Code of Ethics also aims to help people identify ambiguous or potentially risky situations that may arise in the performance of activities, as well as relationships or conduct that are not perfectly clear and that may damage the Company.

Being fully aware of the Code of Ethics is a duty, just as it is a duty to apply it.

The Company carefully monitors compliance with the Code of Ethics, setting up adequate information, prevention and control measures and ensuring the transparency of the operations and behaviours implemented, intervening, if necessary, with corrective actions and appropriate sanctions.

The management of the Code of Ethics is regulated by internal procedure PSQ24.

### 1.1 : Ethical Principles

#### **Fairness**

The principle of fairness implies the respect of rights, also from the point of view of privacy and opportunities, as well as of the laws in force aimed at protecting the individual personality of all persons involved in their work and professional activities.

This also requires the elimination of any discrimination and any possible conflict of interest between employees and HAWAI Italia S.r.l.

#### **Loyalty, Transparency Respect for the Person**

The principle of loyalty requires the Recipients of this Code of Ethics to aim their activities exclusively at the pursuit of the company's objectives.

The principle of transparency, on the other hand, is based on truthfulness, accuracy and completeness of information both outside and inside the company.

The relationship between HAWAI Italia S.r.l. and the recipients of the Code of Ethics is based on loyalty, transparency, respect and mutual trust, also guaranteed by the commitment to full compliance with the obligations respectively assumed with the employment contract and with any other form of contractual relationship as well as the content of this Code of Ethics.

#### **Respect for the Person**

The company places among its principles that of Respect for the Person. The centrality of the person is expressed through the valorisation of one's collaborators and colleagues, respecting their rights, physical, cultural and moral integrity, through attention to the needs and requests of customers and through fairness towards all stakeholders



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## **Honesty and spirit of service**

Honesty is one of the fundamental principles that characterises the company's activities and its entire operations. All the addressees of the Code are required to act 'ethically', i.e. with loyalty and fairness towards all collaborators and stakeholders in general. The spirit of service is understood as the sharing of corporate values by all.

## **Competition**

HAWAI Italia S.r.l. intends to develop the value of competition by adopting principles of fairness, fair competition and transparency towards all operators on the market.

## **Sustainability**

One of the key points of HAWAI Italia S.r.l. is to maintain and consolidate a strategy based on sustainable development, capable of coordinating in a balanced way the economic, environmental and social dimensions, with particular attention to environmental protection and minimization of environmental impact risks.

## **Efficiency**

The principle of efficiency, closely linked to the company's strategy, presupposes that in every activity, economy in the management of resources is pursued, respecting the needs of the customer, according to the prefixed quality standards.

## **Confidentiality**

Each employee and collaborator must ensure the confidentiality required by the circumstances for each piece of information they learn in the course of their work.

## **Compliance with laws and regulations**

HAWAI Italia S.r.l. operates in absolute compliance with the laws and regulations in force in the countries where it carries out its activities, in accordance with the principles set out in the Company Code of Ethics and internal procedures.

Moral integrity and respect for the above principle is a constant duty of all those who have relations with HAWAI Italia S.r.l. and characterises the behaviour of the entire organisation.

The directors and employees of HAWAI Italia S.r.l., as well as those who in various capacities work with the same, are therefore required, within their respective competences, to know and observe the laws and regulations in force in all the countries where it operates.

HAWAI Italia S.r.l. applies strict accounting principles and criteria in order to provide accurate and complete financial information, and to maintain internal controls and processes suitable to ensure that accounting and financial communications comply with the applicable laws.

Employees must undertake to do their best to support the Company's efforts in this area.

## **1.2 Legal references**

This Code refers to all national and international laws, standards and regulations, minimum industry requirements, the United Nations Universal Declaration of Human Rights, the ILO Core Labour Standards, the United Nations Guidelines on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, as well as any other relevant conditions or standards, where the most stringent requirements always apply.



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## 1.3 Communication

A copy of the document has been delivered to

- all employees and agents in force on the date of approval of the document with signature of receipt
- to new employees upon signature of the contract
- published on the company website
- notice to all external stakeholders of consultation document on the website
- other forms deemed appropriate

## 1.4 Application

The Code of Ethics applies to HAWAI Italia S.r.l. and is consequently binding for the conduct of all its collaborators, whether administrators or employees.

**This commitment also applies to Consultants, Suppliers, Customers and anyone who has a relationship with HAWAI Italia S.r.l.; the company will not initiate or continue any relationship with those who do not intend to align themselves with this principle.**

## 2. ETHICS IN LABOUR RELATIONS

### 2.1 Relationships with personnel

HAWAI Italia S.r.l. . promotes and protects the respect for the physical and cultural integrity of the person and the value of human resources in order to improve and increase the heritage and competitiveness of the skills possessed by each member of the company staff,

It encourages the development of individual aptitudes and skills by supporting them with adequate professional training programs, integrated in an organic system of human resources development and growth.

HAWAI Italia S.r.l. guarantees a work environment that is always stimulating, free from any form of discrimination or harassment, promotes diversity and collaboration among its workers, in the belief that cooperation among individuals with different cultures, skills, perspectives and experiences is a fundamental element to support the Company's growth and its continuous innovation.

The evaluation of personnel to be hired is carried out on the basis of the correspondence of the candidates' profiles with those expected and with the Company's needs, while respecting equal opportunities for all those concerned.

The information requested is strictly related to the verification of the aspects envisaged by the professional and psycho-aptitude profile, respecting the candidate's privacy and opinions.

Staff are hired with a regular employment contract; no irregular employment is tolerated.

Remuneration will be in line with the job performed, with the skills expressed by the employee, and never less than what is provided for by the law on wages

All those who in any capacity collaborate with HAWAI Italia S.r.l. are required to maintain a respectful behaviour towards others, refraining from adopting attitudes that may offend the dignity of others.

In particular, all managers and those who, in various capacities, hold top positions, must create and promote a welcoming and supportive working environment, in which integrity, respect for the individual and diversity, collaboration and inclusion are always and constantly pursued.



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**Racial, gender, nationality, religion, language, trade union or political discrimination in hiring, remuneration, promotion or dismissal, as well as any form of favouritism, is prohibited.**

The cooperation of all is required in order to maintain a climate of mutual respect for the dignity, honour and reputation of each person, and in no case may services contrary to personal dignity or constituting a source of unacceptable risk to health and safety be requested from employees and the general public.

In the management of hierarchical relations, the company representatives undertake to ensure that authority is exercised with fairness and correctness, avoiding any abuse and HAWAI Italia S.r.l. resolutely opposes any form of harassment, intimidation or mobbing.

It constitutes abuse of the position of authority to request, as a due act to the hierarchical superior, services, personal favours and any behaviour that constitutes a violation of this Code.

HAWAI Italia S.r.l. recognises the freedom of trade union association and collective agreements for its workers, as well as firmly prohibiting any form of irregular work or exploitation of individuals, as well as any type of compulsory, forced or coerced work.

HAWAI Italia S.r.l. does not accept any form of child labour with employees under 15 years of age as established by ILO convention no. 138

HAWAI Italia s.r.l. is committed to protecting the moral integrity of employees by guaranteeing the right to working conditions that respect the dignity of the person.

For this reason it safeguards workers from acts of psychological violence, and opposes any attitude or behaviour that is discriminatory or damaging to the person, his beliefs and preferences (for example, in the case of insults, threats, isolation or excessive intrusiveness, professional limitations).

Sexual harassment is not allowed and behaviour or speech that may upset the person's sensitivity (for example, displaying images with explicit sexual references, insistent and continuous allusions) must be avoided.

HAWAI Italia S.r.l. collaborators who believe they have been subjected to harassment or discriminated against for reasons related to age, sex, sexuality, race, state of health, nationality, political opinions and religious beliefs, etc., may report the incident to the Internal Control and Supervisory Committee in the manner described in paragraph 3.

## 2.2 Relations with Customers

The activity of HAWAI Italia S.r.l. is focused on the satisfaction and protection of its Customers by listening to requests that may favour an improvement in the quality of products and services.

The company policy is consistent with this objective:

- Relations with those working for HAWAI Italia S.r.l. must be based on the utmost fairness, transparency and cooperation, in full compliance with the laws, regulations and their institutional functions.
- HAWAI Italia S.r.l. protects the privacy of its customers in accordance with the regulations in force, committing itself not to communicate or disseminate their personal, business, economic and any other kind of data if not related to legal obligations.
- Illegal sums of money and bribes are absolutely prohibited by HAWAI Italia S.r.l. under any circumstances. The exchange of money in a form not permitted by law, regardless of the amount, is never permitted.
- Personal gifts or favourable treatment that are an explicit or implicit condition for obtaining



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business in exchange for the gift or favourable treatment **are not permitted**.

- Gifts and promotional items may be given to customers if they do not exceed normal courteous relations and in any case must be of modest value, always in compliance with the law; this must not be interpreted by the counterparty as a search for favours of an economic or business nature.

## 2.3 Relations with Suppliers

HAWAI Italia S.r.l. intends to use suppliers who are competent, loyal and able to "team up" with internal employees in a relationship of indispensable and mutual loyalty, transparency and collaboration.

In any case, in the event that the supplier, in carrying out its activities for HAWAI Italia S.r.l., adopts behaviour that is not in line with the general principles of this Code of Business Ethics, HAWAI Italia S.r.l. is entitled to take appropriate measures to the point of precluding any other opportunities for collaboration.

Relations with suppliers are governed by common principles and are constantly monitored by HAWAI Italia S.r.l..

The stipulation of a contract with a supplier must always be based on extremely clear relations, in accordance with the established procedures. The behaviour of anyone who tries to appropriate the benefits of the collaboration of others, exploiting positions of strength, is unethical.

HAWAI Italia S.r.l. reserves the right to carry out pre-announced or unannounced audits at any supplier's facility and the supplier shall provide a representative to make compliance documentation available.

No HAWAI Italia S.r.l. employee or manager shall take or give illegal money or bribes from contractors, subcontractors, consultants, vendors, suppliers.

In the event that a supplier, subcontractor, potential supplier or any other person or group of persons believes a violation of any of the provisions of this Code of Ethics has been committed, the person(s) in question shall be entitled to report such violation in a strictly confidential and anonymous manner as indicated in paragraph 3 of this document.

## 2.4 Relations with Competitors

HAWAI Italia S.r.l., faithful to the principles that have always distinguished its way of doing business, intends to protect the value of fair competition, refraining from collusive and abusive behaviour, certain that collaboration and confrontation with competitors is an opportunity to improve its standard of quality.

## 2.5 Relations with community

The communication of HAWAI Italia S.r.l. towards the outside is based on the respect of the laws, rules, practices of professional conduct, and is carried out with clarity, transparency and timeliness, safeguarding, among others, sensitive information and industrial secrets.

Any communication made through presentations and promotional material must be truthful and correspond to the modes of conduct established by this Code of Business Ethics.



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## 3 CRITERIA OF CONDUCT

### 3.1 Environmental protection

The Company considers environmental protection as one of its priority commitments; it promotes respect for the environment, identifying it as a qualifying and rewarding element for every type of project.

To this end, it plans its activities by seeking a balance between economic initiatives and environmental needs, in compliance with the applicable laws and regulations, providing the utmost cooperation to the Public Authorities in charge of verifying, monitoring and protecting the environment.

To this end, the Company undertakes in particular to:

- comply with the applicable legal requirements and with the further requirements of regulations signed and concerning the company's environmental aspects
- promote training and awareness/responsibility-raising activities for its personnel regarding environmental issues and the concept of sustainable development;
- ensure cooperation with other local and control bodies;
- adopt specific procedures to minimise the environmental impact of possible emergency situations both at the production/operating site, at customers/producers, and on the territory during waste transport operations;
- minimise the consumption of raw materials and energy;
- follow environmental protection criteria in all political and administrative choices.

HAWAI Italia S.r.l. also undertakes to motivate and sensitise all company employees by promoting a positive attitude and increasing their sense of responsibility towards the environment.

### 3.2 Health and safety protection

HAWAI Italia S.r.l., aware of the importance of guaranteeing the best health and safety conditions in the working environment, undertakes to spread and consolidate a safety culture by developing risk awareness, promoting and demanding responsible behaviour among its employees, resorting to appropriate preventive actions, in order to preserve the safety, health and security not only of its personnel, but of all those who visit its premises.

Every activity of the Company and of the individual employee shall be oriented towards respect and protection of safety in the workplace, scrupulous compliance with the rules and obligations deriving from the reference legislation on safety, as well as compliance with all measures required by internal procedures and regulations.

The Company, in conducting its business, attaches significant value and implements concrete measures to ensure the best working conditions for its personnel, committing itself to:

- fully comply with the applicable legislation and abide by the objectives that the company has decided to pursue;
- Commitment to the prevention of occupational accidents and diseases, including a commitment to continuous improvement of the occupational health and safety management system and its performance;
- creating and maintaining a safe working environment, compatible with the needs of individuals and equipped with the appropriate equipment;
- train and educate people on the risks and emergencies they may encounter and the protective



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equipment available;

- extend protection to all those who have dealings with the Company, in the face of health and safety risks arising from activities that are the Company's responsibility;

- prevent situations of risk and possible damage to persons, property and environmental resources, which may be caused by any reasonably foreseeable cause and within the Company's competence

- allocate the necessary resources and foresee their availability and the right level of competence.

## 3.3 Protection of Company Assets

HAWAI Italia S.r.l. owns various assets, including tangible assets, proprietary information and intellectual property. Each employee is required to protect those entrusted to him/her and to help protect all assets of HAWAI Italia S.r.l..

In case of loss or risk of loss of Company assets, report the fact to the person's superior or to the Internal Control and Supervisory Committee as soon as you become aware of it.

All employees are required to comply with what is set out in the internal rules in force that describe the methods of conduct and the correct use of the instruments that the Company makes available to employees.

In particular, Company communication systems, including connections to the Internet, are to be used only to perform company business or for other instrumental purposes authorised by the respective management, the relevant company directive or instructions.

Employees must take care to always follow instructions on the use of passwords and codes assigned to them.

Misuse of company communication systems includes the processing, transmission, retrieval, access, display, storage, printing and in general the dissemination of fraudulent, harassing, threatening, illegal, racist, sexually oriented, obscene, intimidating, defamatory or otherwise inappropriate material and data.

Furthermore, the company's intellectual assets, which are of various kinds and include, inter alia, software programmes, technical documentation and inventions, must be treated with due care.

Intellectual property created by employees in the course of their work shall be transferred and assigned to HAWAI Italia S.r.l. in accordance with applicable laws and/or the respective employment contract or other agreement, subject to exceptions under international conventions, local laws or special agreements. At the end of the employment relationship, all property belonging to the Company, including documents and media containing proprietary information of HAWAI Italia S.r.l., shall be returned.

The former employee remains subject to restrictions on the use and disclosure of Company proprietary information even after termination of employment.

## 3.4 PROTECTION OF INFORMATION

HAWAI Italia S.r.l. employees have access to the Company's proprietary information, and sometimes to that of third parties.

Such information may be: financial data, industrial programmers, technical information, employee and customer information, and other types of information. Unauthorized access, use or disclosure of such information could harm HAWAI Italia S.r.l. or the third party, so employees are prohibited from accessing, using or disclosing such information without due authorization.





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Here are some rules to help protect information:

- Do not disclose information to anyone that HAWAI Italia S.r.l. has not placed in the public domain, except to:
  - persons working for HAWAI Italia S.r.l. who have access in the course of their work to the type of information in question and have good reason to have it;
  - other persons authorised by HAWAI Italia S.r.l. to receive it;
  - persons to whom such information must be transmitted in the course of their duties.
- Not accessing, duplicating, reproducing or making use, either directly or indirectly, of company proprietary information, except in the context of one's duties and work.
- If learning of any unlawful use or handling of confidential information, promptly report the fact to a supervisor and cooperate fully to protect it.
- Do not store HAWAI Italia S.r.l. information on private computers or other media not provided by HAWAI Italia S.r.l.
- If having to take information off-site for business purposes, take it back to headquarters as soon as such outside duties are completed.

## 3.5 Conflicts of interest

HAWAI Italia S.r.l. recognises and respects the right of its personnel to participate in investments, business or other activities outside those carried out in the interest of the Company, provided that they are activities permitted by law and compatible with the obligations undertaken towards the same.

The Addressees shall act loyally, according to good faith, with diligence, efficiency and fairness, imprinting their conduct on mutual cooperation and collaboration, in compliance with internal procedures and making the best use of the time and instruments at their disposal and assuming the responsibilities connected to the fulfilments.

The activity of each person is inspired by the desire to increase their skills and improve their professionalism.

Every activity performed on behalf of the Company is aimed exclusively at satisfying its interests. Therefore, any situations of conflict between personal interest and that of the Company must be avoided or, at least, communicated in advance: since conflicts of interest often correspond to violations of existing laws.

In particular, participation in bodies, associations, etc. that may create a conflict of interest with the Company's activity should be avoided, as should all situations that may create conflicts of interest.

In any case of doubt, consult the hierarchical superior or the members of the BoD (Bord of Directors) in order to clarify whether a situation potentially leading to a conflict of interest exists.

Any of the following activities that could represent an actual or perceived conflict of interest are prohibited unless approved by the BoD (CDA)

- having a significant financial interest in or obligation to any outside company, which is or seeks to be in business with HAWAI Italia S.r.l. or is an actual or potential competitor of the same;
- serving as a director, officer or any other management or advisory function for any actual or potential competitor of the Company or participating in activities that are directly competitive with those in which the Company is engaged
- conducting significant business on behalf of HAWAI Italia S.r.l. with an outside company that is or seeks to be in business with the Company if a close relative of the employee is a director, manager or employee of such company
- using one's position in the Company or information or business opportunities acquired in the



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performance of one's duties, to one's own undue advantage or that of third parties;

- receive any loan or advance from the Company, or benefit from a guarantee from the same, on a loan or advance from a third party, with the exception of customary advances that are part of ordinary business or approved by the Supervisory Board.

In any case, the Recipients of HAWAI Italia S.r.l. are required to avoid all situations and activities in which a conflict may arise with the interests of the company or that may interfere with their ability to make impartial decisions in the best interest of the company and in full compliance with the principles and contents of the Code or, in a general sense, to perform exactly the functions and responsibilities covered.

Any situation that may constitute or give rise to a conflict of interest must be promptly notified to one's superior or to the Supervisory Board, or, in the case of top management, to the Director; likewise, the person involved shall promptly refrain from intervening in the operational/decision-making process until such time as the superior in a managerial position or the Supervisory Board identifies operational solutions capable of safeguarding the transparency and correctness of conduct in the performance of activities:

- identifies appropriate operational solutions to safeguard, in the specific case, transparency and correctness of conduct in the performance of activities;
- transmit to the persons concerned - and for information to their hierarchical superior and to the Supervisory Board - the necessary written instructions;
- achieves the documentation received and transmitted.

## 4. CONTROL OF COMPLIANCE WITH THE CORPORATE CODE OF ETHICS

Everyone is accountable for his or her actions and conduct.

Function managers, as they direct the actions of others, must set an example for other employees, must be familiar with the values expressed in this document and know how to apply them.

**It must be remembered that no one has the authority to demand that this Code of Conduct be violated or to influence it in this way, and that any such attempt is subject to immediate disciplinary action.**

### 4.1 Control and Supervisory Committees

The Control and Supervisory Committee (CCV) is an internal body appointed by the Board of Directors of HAWAI Italia S.r.l., which shall, by means of appropriate delegations of authority, provide for

- Supervise the knowledge of and compliance with the Code of Ethics through periodic internal inspections;
- Manage all aspects related to the knowledge and application of the Code of Ethics;
- Receive reports of violations of the Code of Ethics, ensuring the confidentiality of the sources of such reports, verifying their veracity and informing the BoD of the results;
- Propose amendments and ensure the periodic updating of the Code of Ethics.

Department Managers must ensure the application of the Code of Business Ethics through appropriate disciplinary measures.

**Department Managers may not ignore any unlawful conduct.**

Each person is obliged to report to his or her superior, or to the VCC, any conduct considered, in good faith, to be contrary to the law or the Code of Ethics. If the superior is involved in the matter, or has been unable or unwilling to deal with it adequately, the case should be reported to a senior manager. Managers are expected to take such situations seriously and work to ensure a satisfactory



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solution in line with our Company's ethics and values as well as the dictates of local laws and regulations.

## 4.2 Disciplinary measures

Compliance with the rules of the Code of Business Ethics is an essential part of the contractual obligations of HAWAI Italia S.r.l. employees.

HAWAI Italia S.r.l. has therefore foreseen the sanctioning system below, which will be applied in case of violation of this Code of Business Ethics.

### 4.2.1 Measures against executives, managers and employees

In case of violation of this Code of Business Ethics by administrators, the CCV shall inform the HAWAI Italia S.r.l. Board of Directors as soon as possible, who shall take the appropriate measures in compliance with the laws and regulations in force.

### 3.2.2 Measures against third parties

Violation of this Code of Business Ethics by third parties who have contractual relations with HAWAI Italia S.r.l., whether natural or legal persons, shall constitute a breach (non-fulfilment) of contractual obligations, with all legal consequences in terms of compensation for damages, and with HAWAI Italia S.r.l.'s right to terminate the contractual relationship due to the third party's fault.

## 4.3 Reporting modalities

Any activity that does not comply with the principles and rules of this Code of Ethics shall be promptly reported.

Reports may be made through

- personal contact: Human Resources Office (HR) contact person 8.00-12.30, 13.30-17.00 (by appointment)
- telephone: +39045/8266400, Human Resources Office (HR) contact hours 8.00-12.30, 13.30-17.00
- mail : [CCV@hawai.it](mailto:CCV@hawai.it)

Should the whistleblower wish to remain completely anonymous, he or she can use the 'Whistleblowing' portal made available by Hawaii at the link or QR code:

<https://hawai.whistlelink.com>



The portal will assign a sequence number to the report, which will be made available to the reporter. Through this number, upon re-entering the portal at a later date, the reporter will be able to follow the progress of his or her report and the response notices that the contact person in Hawaii will enter until the completion of the activity