

QUALITY AND DEDICATION
TO THE GLASS PROCESSING
INDUSTRY WORLDWIDE SINCE 1941

FENZI

CODE OF CONDUCT 2024

Fenzi Group



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Summary

- > Foreword
- > Employees
- > Laws, regulations and governmental authorities
- > Competition
- > Customers
- > Suppliers
- > Finance and administration
- > Communication
- > Data Protection
- > Environmental Protection
- > Conclusions



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1. Foreward

To all Fenzi Group Staff, Customers, Suppliers and Partners

The Fenzi Group stands out on the market not only for the quality and innovation of its products, but also for its responsible behaviour towards employees, the environment, society and all partners who have confirmed its international esteem.

The Fenzi Group exports to more than 80 countries, and in each of them it is committed to respecting local values, traditions and cultures, contributing to the well-being and social stability of the communities in which it operates.

Fundamental principles of behaviour have been therefore established with the aim to ensure compliance with the Group Policy, the applicable laws and regulations which constitute the code for all personnel working at Fenzi.

It is the management responsibility to ensure that all employees are aware of the rules and that they are understood and implemented.



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2. Employees

- > The Fenzi Group considers its employees as the Company's strong point; therefore, it is committed to maintaining a safe and harassment-free working environment, supporting the principle of equal opportunities and opposing any form of discrimination linked to race, colour, ethnic or social origin, gender, sexual orientation, marital status, contractual position, religion, personal and political opinions, disability or any other peculiar characteristic not related to work performance.
(European Union charter of Fundamental Rights, Nice 2000).
- > The Fenzi Group is committed to maintaining a peaceful working environment, in which all employees are listened to and treated with dignity and respect through the support and supervision of its management.
- > The Fenzi Group employs staff on aptitude basis, suitability, qualifications, skills and experience in line with the task to be performed, providing all the necessary training.



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2. Employees

- > The Fenzi Group is absolutely against any form of child or forced labour, always respecting the requirements related to the minimum working age in all the countries in which it is present; under no circumstances resorting to forced labour in any of its activities.
- > The Fenzi Group is committed to offering safe and healthy working conditions for all its employees to prevent them from suffering personal injuries; for this purpose, health and safety training programs are also regularly carried out in accordance with the law.
- > For the Fenzi Group the training and preparation of its staff are fundamental factors, therefore all the necessary resources are made available to increase their professionalism and stimulate them to fully develop their potential.
- > The management and staff involved undertake to reject and not foment any act of sabotage, terrorism or vandalism that could harm human, properties and the environment.



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3. Laws, regulations and government authorities

- > In the event that the Fenzi Group is contacted by any government agency for a request of information, audit or legitimated investigation, employees, in consultation with their supervisor, are expected to fully cooperate mantaining professional, objective and transparent behaviour.
- > All information produced within the organization are and remain property of the Fenzi Group and must not, unless legally or otherwise required, be disclosed to third parties without prior authorization.
- > Each employee is required to protect the Group's intellectual assets, such as: trademarks, patents, trade secrets.
- > It is common practice for the Fenzi Group to comply with all laws and regulations in force in the various countries in which it operates.



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3. Laws, regulations and government authorities

- > The Fenzi Group can introduce various regulations relating to the conduct of its corporate activities, such as regulations on Health, Safety, Quality, Ethics and the Environment. It is the management's responsibility to ensure that all employees are aware of and apply those regulations.
- > The management and staff involved are required to scrupulously observe the anti-corruption laws in force in the countries in which the Fenzi Group operates, including the illegal facilitation of payments in relation to its activities.
- > In managing the activities of the Fenzi Group, staff may find themselves facing a series of legal issues, therefore is the Company's responsibility to ensure that all employees are adequately updated on all relevant local laws to best carry out their job.



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4. Competition

- > The Fenzi Group is aware of the importance of fair market competition and is committed to ensuring that its commercial activities are carried out in compliance with the competition laws and regulation in force in the countries and regions in which it operates.
- > The Fenzi Group is committed to operate according to the rules of fair competition while respecting the laws imposed by the antitrust. The Fenzi Group therefore rejects any agreements with competing companies.
- > The Fenzi Group considers competition an opportunity to improve the offered products and services, while respecting the environment and consumer health.



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5. Customers

- > The Fenzi Group is aware of possible limitations on trades in the countries in which it operates, therefore it acts in full compliance with national and international export control regulations applicable to its business.
- > The Fenzi Group is daily committed to meeting Customers' expectations by offering innovative, reliable products that respect human and environmental safety, starting from raw materials choice.
- > For the Fenzi Group the commitment is fundamental to establish long-lasting commercial relationship with its Customers to guarantee all parties involved.



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6. Suppliers

- > The Fenzi Group manages relationships with its Suppliers by following the principles and rules highlighted in the Supplier Code of Conduct document.
- > The Supplier Code of Conduct is based on four pillars:
 - Ethical and legal requirements
 - Labour and human rights requirements
 - Health and safety requirements
 - Environmental requirements
- > The Fenzi Group encourages its Suppliers to apply the same principles to subcontractors.



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7. Finance and administration

- > The Fenzi Group undertakes to comply with all tax obligations and given the large number and locations of its factories, it avails itself of the collaboration of auditors to guarantee compliance with everyone's laws.
- > Commercial actions are governed by national and international laws, trade experts must ensure that import/export activities are conducted lawfully, in compliance with applicable customs and foreign trade regulations.
- > To protect the Shareholders and guarantee the correctness of financial statements, Fenzi Group uses auditors to certify that all transactions are indicated completely and, its assets are indicated correctly.
- > All accounting and records must be documented in a manner that clearly identify business transactions. No financial record or document may be false or misleading.



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8. Communication

- > The Fenzi Group is committed to ensure open and timely communication with employees, shareholders and commercial partners. Statements via company social media can only be made via authorized personnel.
- > The Fenzi Group requires all its partners, employees and collaborators to share the principles of the Code of Conduct.



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9. Data Protection

- > The Fenzi Group uses programs that allow the electronic exchange of data between its companies and commercial partners, guaranteeing their right to privacy.
- > Employees may collect, use and process personal data only if strictly necessary and permitted.
- > Unauthorized intervention on the Company's IT systems are prohibited, to avoid data deterioration and damage to the Fenzi Group's processes.



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10. Environmental Protection

- > The Fenzi Group undertakes to comply with applicable environmental laws and regulations by eliminating or reducing to the maximum possible extent the release of contaminants into the environment, primarily through the prevention of pollution, waste reduction by recycling, introduction of treatment and control technologies, substitution of materials and sources.
- > The Fenzi Group is committed to fully integrate environmental regulations into all its commercial activities. It accept its commercial responsibilities and recognize its obligations to reduce the environmental impact of its activities and products.



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10. Environmental Protection

- > The Fenzi Group's objective is to constantly improve its performance towards the environment by developing an effective management system. This also involves saving natural resources, preventing pollution, reducing emissions and waste.
- > The Fenzi Group tends to establish environmental objectives and goals by measuring its performances against these objectives. This intent is disclosed to all employees encouraging them to assume a more responsible attitude towards the environment



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11. Conclusions

The concept of Sustainability is an integral part of the philosophy that has always characterized the activity of the Fenzi Group.

The Fenzi Group's policy is to work in harmony with its employees, its customers who will benefit from the results of the work and all partners, always taking care of the social and cultural context to offer well-being to everybody.

The Fenzi Group aims to minimize the environmental impact of its activities and products, always choosing the most environmentally alternatives to achieve the object of sustainable development at an environmental, social and economic level.

The Fenzi Group tends to promote commercial relationships with partners who share the same principle of Sustainability.



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