



GRAMMELOT

Code Of Ethics

Grammelot Srl



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Via Casale, 5 – 20144 Milano, Italy
Cap. Soc. €10.000,00 i.v. P.IVA 09562620964
T +39 0297280169 F +39 0232066978 PEC grammelot@pec.it
info@grammelot.eu ■ www.grammelot.eu



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Revisions

Rev. n.	Writing	Verification	Approval
1.0	10/01/2024	11/01/2024	13/01/2024
	Riccardo Sirtori	Massimo Maronati	Massimo Maronati



1. INTRODUCTION

At Grammelot, we believe that our success is built on a foundation of integrity, trust, and ethical conduct. This Code of Ethics serves as a comprehensive guide to our values and the standards we expect from all employees, contractors, and representatives. It is designed to ensure that our actions are in line with our commitment to responsible business practices, fostering a positive and productive work environment. Adherence to this Code is essential for maintaining the trust and respect of our stakeholders, including employees, customers, suppliers, and the broader community.

2. GENERAL PRINCIPLES

Our general principles underpin every aspect of our operations:

- **Integrity:** We conduct our business with honesty and integrity, ensuring that our actions reflect our words. We are committed to doing the right thing, even when it is not the easiest path.
- **Transparency:** We maintain openness in our operations, fostering clear and honest communication with all stakeholders. This transparency builds trust and strengthens our relationships.
- **Respect:** We value the dignity and diversity of all individuals. We treat everyone with respect, recognizing the unique contributions each person brings to our company.
- **Accountability:** We take responsibility for our actions and their outcomes. Accountability ensures that we learn from our experiences and continuously improve our practices.



3. HUMAN RESOURCES, EMPLOYMENT POLICY AND PRIVACY PROTECTION

At Grammelot, we are committed to creating a supportive and inclusive workplace:

- **Equal Opportunity:** We are dedicated to providing equal employment opportunities to all, regardless of race, gender, age, religion, sexual orientation, or any other characteristic. Our hiring and promotion practices are based solely on merit and performance.
- **Professional Development:** We believe in investing in our employees' growth. We offer continuous learning opportunities and career development programs to help our team members reach their full potential.
- **Privacy Protection:** We respect the privacy of our employees and are committed to protecting personal information. We handle all personal data with the utmost care and confidentiality.
- **Fair Treatment:** We are dedicated to treating all employees fairly, ensuring that everyone has the opportunity to succeed in a safe and supportive environment.

4. PROTECTION OF HEALTH AND SAFETY OF THE WORKPLACES AND WORKING CONDITIONS

Grammelot prioritizes the health and safety of its employees:

- **Safe Work Environment:** We are committed to providing a safe and healthy work environment for all employees. We adhere to strict safety protocols and continuously evaluate our practices to reduce risks.
- **Compliance:** We comply with all health and safety regulations, ensuring that our workplace meets or exceeds legal standards.
- **Preventive Measures:** We implement preventive measures, such as regular safety training and emergency preparedness drills, to minimize potential hazards.
- **Health Programs:** We promote health and wellness programs that support the physical and mental well-being of our employees. This includes access to fitness resources, mental health support, and healthy lifestyle initiatives.



5. ENVIRONMENTAL PROTECTION

Sustainability is a core value at Grammelot:

- **Sustainable Practices:** We are committed to adopting environmentally sustainable practices in all our operations. This includes reducing waste, conserving energy, and minimizing our carbon footprint.
- **Regulatory Compliance:** We comply with all environmental laws and regulations, ensuring that our operations do not harm the environment.
- **Resource Management:** We strive to manage resources efficiently, promoting recycling, and using sustainable materials whenever possible.
- **Awareness:** We educate our employees about environmental issues and encourage them to support and participate in our sustainability initiatives.

6. CONFLICT OF INTEREST

Maintaining objectivity and integrity in our decision-making is crucial:

- **Avoidance:** Employees must avoid situations where their personal interests conflict with the interests of Grammelot. This includes financial interests, personal relationships, or any other situations that could impair judgment.
- **Disclosure:** Any potential conflicts of

interest must be promptly disclosed to management. This allows us to manage and mitigate any potential issues proactively.

- **Objectivity:** All decisions should be made in the best interest of Grammelot, free from personal bias or undue influence. Employees are expected to act with impartiality and fairness in all business dealings.



7. OPERATING PROCEDURES AND ACCOUNTING RECORDS

Accuracy and transparency in our operations are fundamental:

- **Accuracy:** All business records and accounts must be maintained accurately and reflect the true nature of transactions. This ensures reliability and trust in our financial reporting.
- **Compliance:** We adhere to all applicable laws, regulations, and industry standards in our accounting practices. This includes following internal policies and external regulatory requirements.
- **Transparency:** Financial records must be maintained in a manner that promotes transparency and accountability. Regular audits and reviews are conducted to ensure compliance and accuracy.

8. PROTECTION OF COMPANY ASSETS - CUSTODY AND MANAGEMENT OF THE COMPANY ASSETS

Proper management of company assets is essential for our success:

- **Asset Protection:** Employees are responsible for the proper use and protection of company assets. This includes physical assets, intellectual property, and financial resources.
- **Custody:** Company assets must be safeguarded against loss, theft, or misuse. Employees must follow all company policies regarding asset management.
- **Efficient Use:** Assets should be used efficiently and for legitimate business purposes only. Misuse or unauthorized use of company assets is prohibited.



9. INTRAGROUP RELATIONSHIPS

Promoting harmony and cooperation within our company group:

- **Cooperation:** We promote cooperation and synergy among all entities within the Grammelot group. This ensures that we work together effectively towards common goals.
- **Shared Values:** All group entities adhere to the same ethical standards and principles outlined in this Code of Ethics.
- **Support:** We provide mutual support and share best practices within the group to enhance our collective performance and success.

10. SURVEILLANCE BODY

Ensuring compliance through effective oversight:

- **Oversight:** A designated body is responsible for overseeing compliance with this Code of Ethics. This body is empowered to monitor, review, and enforce ethical standards.
- **Reporting:** Employees can report unethical behavior or violations of this Code to the surveillance body without fear of retaliation. Confidentiality and protection for whistleblowers are guaranteed.
- **Investigation:** The surveillance body will investigate all reports promptly and thoroughly, taking appropriate action as necessary.

11. EXTERNAL RELATIONS

Building strong, ethical relationships with external parties:

- **Fair Dealing:** We conduct our business with fairness and integrity in all external dealings. This includes relationships with customers, suppliers, and other stakeholders.
- **Compliance:** We comply with all applicable laws and regulations in our interactions with external parties. This ensures that our business practices are lawful and ethical.
- **Respect:** We respect the interests and perspectives of our customers, suppliers, and other stakeholders. Building trust and long-term relationships is a priority.



12. MEDIA RELATIONS AND INFORMATION MANAGEMENT

Managing our public image and information dissemination responsibly:

- **Authorized Spokespersons:** Only designated spokespersons are authorized to interact with the media. This ensures that our messaging is consistent and aligned with company policies.
- **Consistent Messaging:** All communications with the media must be consistent with the company's values and policies. Clear and accurate information helps maintain our credibility.
- **Media Inquiries:** Media inquiries should be directed to the appropriate department for response. This ensures that all information provided is accurate and official.

13. BREACHES OF THE CODE OF ETHICS – PENALTY SYSTEM

Maintaining accountability through clear consequences:

- **Reporting:** Employees are encouraged to report any breaches of this Code of Ethics. Reporting can be done confidentially and without fear of retaliation.
- **Investigation:** All reports of breaches will be investigated promptly and fairly. The surveillance body will ensure that investigations are thorough and unbiased.
- **Consequences:** Breaches of this Code may result in disciplinary action, up to and including termination of employment. The nature and severity of the breach will determine the appropriate penalty.
- **Protection:** Employees reporting breaches in good faith will be protected from retaliation. We encourage openness and transparency in addressing ethical concerns.