



## Summary

<b>1. List review</b> .....	1
<b>2. Forward</b> .....	2
<b>3. PEI Code of Conduct Scope of application</b> .....	2
<b>4. Business Principles</b> .....	2
4.1. Legal Compliance.....	2
4.2. Relation with Business Partners .....	2
4.3. Fair competition and anti-trust.....	2
4.4. Export controls and economic sanctions .....	3
4.5. Accounting and Reporting.....	3
4.6. Privacy .....	3
4.7. Disclosure of information .....	3
4.8. Intellectual property and counterfeit parts.....	4
4.9. Conflicts of Interest .....	4
4.10. Political Involvement.....	4
<b>5. Environmental Principles</b> .....	4
5.1. Resource Efficiency.....	4
5.2. Precautionary Principle.....	4
<b>6. Human Rights and Workplace Practices</b> .....	4
6.1. Human Rights .....	4
6.2. Non-Discrimination .....	4
6.3. Labour.....	5
6.4. Work Environment .....	5
6.5. Mutual respect .....	5
6.6. Harassment: .....	5
6.7. Freedom of association and the right to collective:.....	5
<b>7. Responsibility of managers and Employees</b> .....	5

### 1. List review

Edition	Date	Editor	Description
00	20/01/2020	Luca Guidi	First edition



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## **SOCIAL RESPONSIBILITY CODE OF CONDUCT POLICY**

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**Doc. No.**

**COC-001**

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01	15/03/2020	Luca Guidi	Introduction of new topics in Business Principles and Human Rights and Workplace Practices
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### **2. Forward**

The PEI code of Conduct is the corporate policy and general reference document on ethical issues and for appropriate business practices.

The Code of Conduct formalizes the principles that PEI shall commit in relation to employees, business partners and other associates.

### **3. PEI Code of Conduct Scope of application**

The PEI Code of Conduct has been adopted to underscore the principles by which PEI conducts its relations with employees, business partners and other associates. It applies to all employed directly or indirectly by PEI.

### **4. Business Principles**

#### **4.1. Legal Compliance.**

In every country in which it operates, PEI shall abide by the laws and regulations of that country.

#### **4.2. Relation with Business Partners**

PEI's dealings with its business partners are to be characterized by fairness. PEI shall not offer customers, potential customers, governments, agencies of governments, or any representatives of such entities, any rewards or benefits in violation of either applicable laws or reasonable and generally accepted business practices.

PEI employees must not accept payments, gifts, or other kinds of reimbursement from a third party that could affect or appear to affect their objectivity in their business decisions.

#### **4.3. Fair competition and anti-trust**

PEI defends fair competition in the market and opposes any behaviour tending to restrict competition in any form.

PEI doesn't allow his own employees to enter into any anti-competitive agreements and any understanding with competitors. Agreements with other companies—for example, suppliers, customers and distributors—may also be subject to antitrust restrictions, in case the business partner has a strong market position.



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#### **4.4. Export controls and economic sanctions**

PEI operates only within the confinement of transactions recognized as permitted by national or international export control regulations: in particular PEI undertakes not to produce and export restricted goods as "dual use" goods, goods that can be used for the death penalty, for torture or for other cruel, inhuman or degrading treatment or punishment, military goods, weapons covered by the T.U.L.P.S. in force, firearms, substances that reduce the ozone layer and products containing the same, fluorinated gases, flora or fauna or goods obtained using species of fauna and flora protected, skins and furs of dogs and cats, and products obtained with them, goods subject to control / authorization of cultural heritage, narcotic or psychotropic substances pursuant to current national and community provisions, hazardous chemicals, waste, drug precursors and not to export in embargoed or blacklisted countries.

#### **4.5. Accounting and Reporting**

All financial transactions by PEI must be reported in accordance with generally accepted accounting practices, and accounting records must show the nature of all transactions in a correct and non-misleading manner. PEI will provide disclosure that is open, truthful, relevant, comprehensible and timely.

#### **4.6. Privacy**

PEI Adopts the necessary security measures to guarantee the privacy and security of the data in its possession. The measures adopted concern the following area: protection of areas and premises relevant to their custody and accessibility, electronic tools management (data backup, antivirus, updating the operating system and software used, uninterruptible power supply, firewall and anti-intrusion systems, electronic tools maintenance management).

Furthermore, an identification and authentication system is guaranteed for each of the persons in charge who processes personal data; written instructions are given to the appointees, aimed at checking and custody, for the entire cycle necessary for carrying out the processing operations, deeds and documents containing personal data both electronic and written form. Persons admitted, for whatever reason, after office closing time, in the places containing sensitive or judicial data archives are traced by documented information.

#### **4.7. Disclosure of information**

PEI guarantees the confidentiality of the data, documents and information regarding business negotiations, procedures, transactions and contracts. Each Employee is required to safeguard the private and confidential nature of the information acquired as part of his/her work duties, and sign a confidential agreement in which is specified that he can't disclose and or allow viewing to third parties of data information concerning prototypes, artefacts, projects that he became aware of in the job activities and he undertakes not to disclose in any way data, information, news, materials and avoiding anything that will allow others to benefit from them.



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### **4.8. Intellectual property and counterfeit parts.**

PEI works diligently to protect the company's intellectual property. During the development of new solutions and in any case before a product is launched on the market, PEI carries out the anteriority examination relating to any existing patents that may anticipate the inventive step, thus avoiding the risk of counterfeiting. Where the research shows actual innovation, PEI proceeds with the filing of one or more patents, identifying the geographical area in which to file the patent case by case. These activities protect the customer from counterfeit parts.

### **4.9. Conflicts of Interest**

Employees of PEI shall conduct their private and other external activities and financial interests in a manner that does not conflict or appear to conflict with the interests of PEI. Should such a conflict of interest arise, it must be reported immediately by the person subject to the conflict to his/her immediate supervisor.

### **4.10. Political Involvement**

PEI observes neutrality with regard to political parties and candidates. Neither the name nor the assets of PEI shall be used to promote the interests of political parties or candidates.

## **5. Environmental Principles**

### **5.1. Resource Efficiency**

PEI's products and processes are to be designed in such a way that energy and raw materials are used efficiently, and waste and residual products are minimized over the products' life cycles.

### **5.2. Precautionary Principle**

PEI supports the precautionary principle by avoiding materials and methods posing environmental and health risks, when suitable alternatives are available.

## **6. Human Rights and Workplace Practices**

### **6.1. Human Rights**

Within its sphere of influence, PEI supports and respects the protection of internationally proclaimed human rights and ensures that it is not complicit in human rights abuses.

### **6.2. Non-Discrimination**



PEI hires and treats its employees in a manner that does not discriminate with regards to gender, race, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, social or ethnic origin.

Medical testing or physical examination of any worker or potential worker for the purpose of discrimination are not be permitted in any situation.

### 6.3. Labour

No form of forced, compulsory or child labour is tolerated by PEI. The minimum employment age is the age of completion of compulsory school as per local labour laws.

### 6.4. Work Environment

The necessary conditions for a safe and healthy work environment is provided for all PEI employees.

### 6.5. Mutual respect

PEI promotes with energy and encourages mutual respect among colleagues and between our companies and our business partners; we strongly fight against intimidating, offensive or hostile work environment.

### 6.6. Harassment:

PEI ensures that there is no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment.

### 6.7. Freedom of association and the right to collective:

PEI ensures the right of all workers to form and join trade unions and bargain collectively: freedom of association and the right to collective bargaining are respected in all the sites under PEI influence, and workers' representatives are not subject of discrimination and have access to all workplaces necessary to carry out their representation functions (se also statement 6.2 Non-Discrimination)

## 7. **Responsibility of managers and Employees**

It is the responsibility of PEI managers to communicate and demonstrate the content as well as the spirit of this document within the organization, and to encourage employees to reveal behaviour that may be non-compliant with these principles.

Explicit or implicit approval of questionable actions will not be tolerated.

Reports of violations of this code can be done anonymously and confidentially to the general management. Persons reporting violations in good faith will not be subject to retaliation.



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This Code of Conduct will be promptly and consistently enforced. Failure to comply with its provisions can result in disciplinary action.