



# italkrane

THE HIGHEST LEVEL OF EXPLOSION PROTECTION

## CODE OF ETHICS





## CODE OF ETHICS: PREMISES, PURPOSE, AND DEFINITION

The **Italkrane** code of ethics is an important document for the life of the company. It is the fundamental charter that spells out moral rights and duties, defines responsibilities, and outlines important social guidelines for each component of the organisation. The code of ethics has many purposes, the noblest of which is to serve as an effective means of preventing irresponsible behaviour by formalising the responsibilities of each company operator. The code of ethics also establishes what behaviour is expected from those involved directly or indirectly in the company's activities, with the aim of aligning customers, suppliers, partners, employees, collaborators, and public institutions on issues that Italkrane considers of fundamental importance.

This document therefore has clear objectives:

- Define and make explicit the general ethical values and principles espoused by Italkrane;
- Formalise conduct that is morally appropriate, fairness, equality, protection of the person, transparency, diligence, honesty and confidentiality of every person involved in the company's activities;
- Indicate to employees, collaborators and directors the values that have guided the company since its inception, guaranteeing predictable behaviour in line with shared principles;
- Define implementation tools and methodology.


Of fundamental importance is the assumption that there is no code of ethics that can override or replace the laws in force or the existing National Collective Labour Agreement, which retain priority status in respect of all work activities. However, each addressee is expressly required to be familiar with its contents, to actively contribute to its implementation and to report any shortcomings and violations.

### But what is ethics?

Ethics, in a general sense, expresses a set of rules of conduct, public or private, followed by a person or a group of individuals. It is not purely theoretical, as it is a point of reference for the practical life of all of us. Therefore, it is a set of abstract principles and values that have an impact on daily life and are translated into norms of behaviour. To use the words of the philosopher Immanuel Kant, one can define as ethical the behaviour of one who acts, guided not by fears of punishment or opportunistic hopes of reward, but by his own reason *"in such a way as to treat humanity, as much in its own person as in that of any other, always together as an end, never simply as a means to an end"*.

## TO WHOM THE CODE OF ETHICS IS ADDRESSED

The code of ethics is addressed to anyone who meets Italkrane and represents an invitation to observe, in any situation and context, the principles it contains. The first to comply with its contents are the company directors, who must conform to this charter the actions, projects, and investments useful to increase, in the long term, the economic value of the company and the well-being of its employees, customers and suppliers. The sector managers must, on the other hand, take responsibility internally and externally, strengthening trust, cohesion, and team spirit. Company employees must undertake to respect the laws and regulations in force in the country and, in the presence of doubts and perplexities on how to proceed, ask their superiors to offer the necessary directives and operational information.



Italkrane undertakes to facilitate and promote the knowledge of the code of ethics by its addressees and to scrupulously supervise its observance, preparing adequate information, prevention, and control tools to ensure the transparency of the operations and behaviour implemented, intervening, where necessary, with corrective actions.

## **FUNDAMENTAL RIGHTS**

Italkrane cherishes the fundamental rights of each individual and always acts with respect for moral integrity and equal opportunities. One of the main objectives of corporate life is to maintain a serene and fair working environment. Italkrane does not tolerate any form of exploitation, isolation, harassment, discrimination for personal or work-related reasons. Any form of discrimination based on diversity of race, language, colour, faith and religion, political affiliation, nationality, ethnicity, age, gender and sexual orientation, marital status, disability and physical appearance, economic and social condition is condemned and expressly prohibited. The granting of any privilege related to the reasons listed above is also prohibited, without prejudice to the provisions of the regulations in force. Finally, the company prohibits any disciplinary sanctions against those who have legitimately refused a work service unduly requested by any person linked to it.

## **HUMAN RESOURCES, AN INVALUABLE ASSET**

Selection, training, management, and professional development are carried out by Italkrane without any kind of discrimination and based on criteria of merit, competence and professionalism. Each person involved constitutes an indispensable factor for the success of the company. Italkrane is committed to protecting and promoting the value of its human resources with the aim of increasing human assets, competence, and healthy competitiveness. The company does not shy away from recognising achievements, specific potential, and professional skills as central moments in the company's growth process.

Italkrane carries out the training, selection, management and development of human capital without discrimination and following criteria of merit, competence and professionalism. In this way, the company ensures the protection of the principle of equal opportunities and manages career and salary advancements on this basis, in a continuous and balanced comparison with the reference market, ensuring transparency, seriousness, fairness and clarity in the assessment methods applied. Italkrane places innovation at the centre of its activities, believing that the latter requires at organisational level an elevated level of dynamism and attention to the people who are part of the company, to customers and suppliers.

In Italkrane, innovation does not only pertain to the strictly technological framework, but also to the sphere of human relations; to this end, it merges technological values with ethical ones, proposing, within the company, a climate of widespread trust from which better operational efficiency derives, based on the synergy between the individual and the company, on its own sense of responsibility and in respect of the very close link between economic imperative and ethical value. For these reasons, Italkrane is aware of its place in the territory and operates a constant focus on the outside as much as on the inside.





## **CRITERIA OF CONDUCT: THE COMPANY'S COMMITMENT**

In full compliance with this code of ethics, Italkrane commits itself:

- To ensure maximum dissemination of the principles contained in this document among employees and external collaborators.
- To encourage clarification and explanation of what is contained in these pages concerning the interpretation and implementation of the code of ethics in company procedures.
- To verify and ascertain violations of the code of ethics, to take appropriate sanctioning measures.
- To adopt all necessary safety measures and to undertake to ensure the psychophysical and moral integrity of each person involved. To this end, Italkrane guarantees protection in terms of safety in the workplace and undertakes to promote good practices useful for prevention, even more than the obligations expressed by law.
- To safeguard the principle of equal opportunities by ensuring fair management of career and salary advancement.
- To carry out a continuous comparison with the reference market, committing to transparency, seriousness, fairness and clarity on the evaluation methods applied to workers' performance.
- To disseminate and consolidate a strong environmental culture and awareness, always operating in compliance with applicable laws and applying the best available technologies.

All the principles Italkrane is inspired by stem from the desire to create, provide and maintain a healthy environment within the company, extending to the broader concept of environmentally friendly conservation for future generations.

## **INTERNAL CONTROL**

It is the company's policy to disseminate, at all levels, the existence and importance of controls on its activities. With its internal control system, Italkrane intends to pursue the general objectives of effectiveness and efficiency of its operations, of safeguarding the company's assets and resources, of compliance with laws, regulations, and internal procedures and of reliability of accounting and financial data. Each employee is therefore responsible, within the scope of his or her activity, for implementing, maintaining, and monitoring the correct functioning and effectiveness of the internal control system.

## **CRITERIA OF CONDUCT: DUTIES OF HEADS OF CORPORATE FUNCTIONS**

Underlying the behaviour of each sector and function manager in the company is respect for their collaborators and relations based on cooperation, with the aim of fostering the development of a spirit of belonging. To guarantee participation in activities in a climate of mutual exchange and help, the managers are committed to implementing and maintaining correct, valid, and motivating information flows, capable of making each person involved aware of his or her contribution and contribution to the company's activities.

Of fundamental importance is the knowledge of the aptitudes of each worker, to assign him/her tasks in which he/she is aware of being efficient. Italkrane guarantees everyone the same opportunities to express their professional potential.

Each sector manager or company function is obliged to:

- Report to the company management any information provided by workers or obtained by its own detection concerning cases, even doubtful ones, of breach of the code of ethics.
- To set an example through one's own behaviour for the employees in one's own sector or company function and to direct them to observe the rules contained in this document.
- Work to ensure that workers understand that compliance with the rules contained in the code of ethics is an essential part of the quality of work performance.

## **CRITERIA OF CONDUCT: DUTIES OF EMPLOYEES**

While the code of ethics in no way replaces the law and contractual agreements on employee duties, employees are always required to respect values such as dedication, loyalty, professionalism, honesty, mutual respect, and a spirit of cooperation.

Specifically, employees must:

- Adopt conduct inspired by the utmost transparency, correctness, and legitimacy, performing their professional activity with commitment and rigour. Employees are also called upon to make an appropriate contribution to their assigned responsibilities, acting in the service of protecting the prestige and good name of the company.
- Refrain from conduct contrary to the rules in this document.
- Report to the administration, in a timely manner, any news concerning violations of the code of ethics.
- Acquire knowledge of the laws and regulations that affect one's tasks, to recognise potential risks and know when to ask for company support.
- Set one's own activity, whatever the level of responsibility attached to the role, to the highest degree of efficiency, adhering to the operational instructions given by higher hierarchical levels and contributing, with colleagues and superiors, to the pursuit of common objectives.
- Immediately inform company management about the induction by others of unethical or unlawful behaviour or acts.
- Ensuring a constant commitment to making the best of acquired skills, while being aware of continuously improving them through the tools offered by the company and personal will.
- In dealings with third parties, each worker, according to his or her competencies
- Take care to adequately inform third parties, according to their competences, about the commitments and obligations imposed by the code of ethics; demand compliance with the obligations that directly concern its activity, take appropriate internal and, if within its competence, external initiatives, in the event of failure to comply with the obligation to comply with the rules set out in this document.
- To be driven by a natural competitive urge, implemented also through the realisation of improvements useful to oneself and the team.
- Italkrane pursues individual and corporate excellence, paying particular attention to time management, both in decision-making and implementation.



## **PROFESSIONAL ACTIVITY: RULES OF CONDUCT**

Everyone involved in the company's activities is required to behave in a fair, transparent and efficient manner. This applies in relations between workers, with customers and with suppliers, irrespective of the importance of the business being transacted. Work must be performed with professionalism, reliability, precision, consistency, and courtesy. One must never be accepted to perform a task for which one is not qualified; should one find oneself in difficulty, one must be reported promptly, to be supported or replaced. A total sharing of knowledge and a constructive environment aimed at cooperation, both within the group itself and open to receiving new stimuli from outside, must be guaranteed. It is forbidden to offer money or gifts to directors, officers, employees of customers or their relatives, except for symbolic gifts, of utility and of modest value. Any employee who is offered or receives gifts or gratuities from third parties, which cannot be attributed to normal acts of business courtesy, shall immediately inform his/her superior. In the case of Christmas or other gifts intended for individuals, such gifts shall be brought to the attention of the management, which shall make its own assessment on acceptance. External collaborators (consultants, agents, service providers) are also bound by these principles.

## **COMPANY MEANS AND TOOLS, GOOD PRACTICES REGARDING THE USE**

Everyone is required to ensure the utmost respect for the company's means, tools, materials, and infrastructures, promptly reporting any possible, even presumed, misuse of such equipment to their supervisor. These categories include, for example: premises, furniture and furnishings, operating equipment, equipment of any kind, functionalities offered by the company information system and user materials such as books, manuals, newspapers. The employee is obliged to use the company's equipment for the performance of the work to which he/she is assigned. It is therefore forbidden to act with company equipment, whether IT, technical or of any other kind, for the pursuit of private ends or interests or in competition with Italkrane's activities. Workers are allowed to use equipment and materials outside Italkrane facilities only in case of authorised use for company reasons.

## **CONFLICT OF INTEREST**

To avoid conflicts of interest, all activities must be undertaken exclusively in the interest of the company and in a correct, transparent, and lawful manner. Employees are required to avoid situations and activities in which a conflict may arise with the interests of the company or which may interfere with their ability to make impartial decisions in the interest of the company and in full compliance with the rules of this document. Employees are required to avoid conflicts of interest between personal and family economic activities and the duties they hold within Italkrane. In the event of a situation involving conflicts of interest (economic, financial, work, family, competition, instrumental utility) the employee is required to promptly notify the management. The same principle applies in case of doubt as to whether a conflict of interest has arisen.

## **CONFIDENTIALITY RULES**

Workers are required to maintain the strictest and most absolute confidentiality on any information, obtained by virtue of their work, pertaining to Italkrane and its employees. This is to avoid the disclosure of confidential information pertaining to the company and its production methods.

Each company subject shall acquire and process only the data necessary for the purposes directly attributable to the function performed; acquire and process data in compliance with specific procedures; store data in such a way that unauthorised persons are prevented from gaining knowledge of it; communicate data within established procedures and/or with the explicit authorisation of superiors; ensure that there are no constraints on the possible disclosure of information concerning third parties connected to the company by a relationship of any nature and, if necessary, obtain their consent.

## **FREE COMPETITION LAW**

It is against company policy to have exchanges of information and/or agreements with any competitor regarding prices, pricing policies, discounts, promotions, sales conditions, and production costs. Italkrane respects free competition and its rules, therefore any form of agreement, direct or indirect, that is made or put in place with competitors for the purpose of disturbing the performance of public tenders is also forbidden. Each company subject is invited to submit to the management any doubt concerning free competition, with particular attention to initiatives that may be sanctioned by law. It is the prerogative of every Italkrane activity to operate in full compliance with the rules.

## **RELATIONS WITH CUSTOMERS, SUPPLIERS, INSTITUTIONS AND MEDIA**

The customer, or whoever benefits from the services and works offered by Italkrane, is at the heart of the company's activities, and every job is designed primarily to ensure his or her satisfaction. Every job must be carried out with the utmost diligence, with precision and punctuality. Each company subject is called upon to observe the internal procedures established to manage the relationship with customers in the best viable way. It is also necessary to provide the customer with accurate information about the products and services offered by Italkrane, as well as to comply with transparency in any communication.

Suppliers also enjoy the same respect and employees are obliged to observe the procedures established for the management of labour relations with them. Obligations towards suppliers also include those of pursuing the best possible cooperation to achieve the fulfilment of requests, of observing and enforcing existing contractual conditions, and of maintaining an open, frank, and transparent dialogue on company customs. Every worker shall bring to the attention of management any problems arising in relations with suppliers.

In dealings with public institutions, workers, by virtue of the tasks they perform within the company, are required to respect their position, and ensure that all relations with the outside world are intended for the intended purposes. All company employees are required to be transparent and to comply with documentation, where required, to ensure the clarity of the relevant movements of money.

Finally, all employees and collaborators, including external ones, must ensure that the image of Italkrane appears in keeping with the prestige and importance of the role the company holds. Relations with the organs of information are reserved exclusively to the company functions and responsibilities delegated to them and are agreed with them in advance. Employees may not provide information or opinions and make statements on behalf of the company to representatives of the media, nor undertake to do so without the necessary delegation of the competent functions. In no manner or form may employees offer payments, gifts or other advantages aimed at influencing the professional activities of media functions.



## **COMPLIANCE WITH COPYRIGHT LAWS**

Italkrane is committed to full compliance with current copyright laws. The use of copies and illegal duplication of software constitutes an offence that can have profound consequences for the company or the end user. Italian legislation protects software with appropriate laws, in line with technological evolution and European Union directives, which provide for criminal and administrative sanctions for those who violate the regulations. Italkrane undertakes to always supply original software, or authorised copies, especially if they are third party products, necessary for the performance of work. Such products must be accompanied by a user licence. If the third-party software components used are integrated in the solution offered, specific mention must be made of them.

## **TRANSPARENCY IN ACCOUNTING ACTIVITIES**

Every operation and accounting transaction must be properly recorded, authorised, verifiable, legitimate, consistent, and appropriate. All actions and transactions must be properly recorded and it must be possible to verify the decision-making, authorisation and execution process. Adequate supporting documentation of the activity performed shall be kept for each operation, to allow for easy accounting records, the identification of the various levels of responsibility and the accurate reconstruction of the operation, also to reduce the likelihood of errors of interpretation. All documentation must be promptly filed according to the paper and/or digital management rules established by the company. It is the worker's duty to ensure that the documentation relating to his/her activity is easily traceable and ordered according to logical criteria. The use of company funds for illegal or improper purposes is prohibited. On no account may payments be made that are not based on properly authorised company transactions or illegal forms of remuneration. Any neglect, omission or falsification of which employees become aware must be promptly reported to management.

## **CORPORATE MARKETING**

In compliance with transparency, Italkrane undertakes to provide only information that corresponds to reality and to respect the law on Privacy regarding data received. The company also provides, to anyone who requests it, information on how their name was found, offering the possibility of cancellation from the lists. Italkrane member companies, likewise, undertake to manage, in compliance with the regulations in force, the names and data contained in their mailing lists and not to send untruthful or defamatory information via e-mail; not to carry out "spamming" actions on current and potential customers, to give the possibility of deletion from mailing lists at any time and to provide information on how a user's data was found at any time; to provide themselves with all the necessary technological tools so that, when sending e-mail communications, no files are attached that may contain computer viruses capable of damaging the contents of receiving computers or their e-mail systems.

## **BREACH OF THE CODE OF ETHICS: DISCIPLINARY MEASURES AND FINAL PRINCIPLES**

Italkrane has so far distinguished itself for credibility and customer appreciation. Unethical or illegal behaviour would cause the company to damage the relationship of trust with all partners, with profoundly severe damage to image, reputation, and credibility. Every company subject is required to comply with this code of ethics and the observance of its rules is an essential part of the contractual obligations of Italkrane's employees and collaborators, pursuant to and for the purposes of Articles 2104 and 2106 of the Italian Civil Code.



Violation of the provisions contained in this document may result, depending on the case, in the application of the sanctions and disciplinary measures provided for by the applicable Collective Agreements, compensation for damages, verbal or written warning, suspension or immediate termination of employment or business relations, or any other disciplinary measure deemed appropriate to the circumstances. Certain violations of this Code of Ethics may also be prosecuted civilly or criminally by administrative or other authorities. The employment relationship may be terminated in accordance with its terms and pursuant to applicable regulations.

This document shall be applied to all employees to be hired from now on, while for those hired previously it shall be approved by them through specific acceptance. The rules contained in these pages do not represent an exhaustive list of the standards adopted by Italkrane, nor an exhaustive list of the types of conduct liable to disciplinary measures.





**ITALKRANE lifting equipment**

**Bridge cranes**

**Electric wire rope hoists**

**Winches**

**Special cranes**

**Chain hoists**

**Crane Kit**

**Components**

**Via Monza, 13 - 20060 - Bussero (Milano – Italy)**

**+39 02 92 97 21 - [italkrane@italkrane.it](mailto:italkrane@italkrane.it)**

**Sales: [chiara.giovanetti@italkrane.it](mailto:chiara.giovanetti@italkrane.it)**

**After sales: [banfi@italkrane.it](mailto:banfi@italkrane.it)**

**Spare parts: [bolzoni@italkrane.it](mailto:bolzoni@italkrane.it)**