

TRIVI



CODE OF ETHICS



Index

The company	4
Code of Ethics	4
Employees	6
The Business	8
Social responsibility	10
Whistleblowing	10

The company

Founded in 1948, TRIVI has become the Italian specialist in the production of systems for the food industry with a complete range of machines and equipment for the production of puff pastry, croissants, pizza, breadsticks, bread, flat bread and cakes.

TRIVI production includes automatic leavening and cooling cells, tray handling circuits, automatic tray storage warehouses, automatic unloaders, cooling and leavening spirals.

Over the years TRIVI has been able to transform Italian wisdom and creativity in the art of bakery into more than 1,500 ultra-high performance industrial plants, helping to spread the quality of Italian food all over the world.

TRIVI has always been committed to the core values of honesty, diligence, responsibility, fairness, loyalty, integrity, transparency and mutual respect towards all stakeholders, starting with its employees.

This commitment translates into compliance with social, environmental and fiscal legislation and regulations, fair competition and anti-corruption.

The same commitment is also required of any party that has dealings with TRIVI.

Code of Ethics

TRIVI has decided to express in a Code of Ethics the ethical commitments and responsibilities that TRIVI assumes in the conduct of business and corporate activities.

This Code explicitly sets out the values in which TRIVI believes, the guiding principles, the rules of conduct that enrich TRIVI's decision-making processes and the duties and responsibilities which must inspire the behaviour of the subjects who operate in TRIVI and with TRIVI.

The Code of Ethics represents a fundamental and essential tool for guiding the behaviour and conduct of the subjects who work for TRIVI, in order to avoid carrying out actions that could damage TRIVI itself.

Trivi will actively work to ensure the dissemination and knowledge of the Code of Ethics to all interested parties, the deepening and updating of the same as well as to verify the effective application of the values and principles enshrined therein and sanction any violations.



Employees

TRIVI places value on its human resources as a factor of fundamental importance for its entrepreneurial activity. The management of human resources is based on the respect for the personality and professionalism of each person without discriminations of gender, age, race, class, national origin, religion, disability, sexual orientation, trade union membership or political opinion.

Health and safety in the workplace

TRIVI and its affiliated companies undertake to guarantee a healthy and safe workplace, minimizing the risks and the threats present through measures for the prevention of accidents and regular and documented training on Health and Safety.

TRIVI undertakes to create a work environment that guarantees its employees in any capacity and at any level, conditions that respect health, safety, and personal dignity.

TRIVI, in compliance with applicable current provisions, undertakes to protect the health of workers, preparing all necessary and appropriate measures, in view of guaranteeing the absolute compliance of workplaces with standards on safety and hygiene.

The “culture” of health and safety is spread by TRIVI through training and communication moments and is achieved through continuous updating of methodologies and systems, carrying out an analytical risk assessment of the criticality of the processes and resources to be protected.

As part of their duties, TRIVI employees are required to comply with all the safety measures and company guidelines regarding accident prevention and to actively cooperate in the process of risk prevention and health and safety protection for themselves, colleagues and third parties.

TRIVI employees are also required to preserve the integrity of the corporate assets with responsible behaviour by respecting the procedures established for the correct use of the corporate assets and tools, which must not be used for purposes other than their own within the ambit of the activity of the Company.

Harassment and bullying

TRIVI does not allow harassment of any kind whatsoever, whether moral, mental or sexual, to and from any level in the company, in internal and external work relations.

TRIVI refuses any action that could constitute abuse of authority and, more generally, that violates the dignity and psycho-physical integrity of the person.

Child labour

TRIVI repudiates any form of labour exploitation. It refuses to use work performed by minors and does not in any way resort to child labour provided by third parties.

Associations and Trade Unions

TRIVI ensures the right of every worker to join and form trade unions of their choice and the right to collective bargaining.

Selection and management of human resources

TRIVI develops the aptitudes and potential of the personnel who collaborate in various capacities with TRIVI so that the abilities and legitimate aspirations of individuals find full realization in the achievement of corporate objectives.

TRIVI undertakes to adopt criteria of impartiality, merit, competence, and professionalism for any decision concerning relations with employees, collaborators and self-employed workers in any capacity operating for the same. The selection and hiring of personnel are guided by the principles of correctness, transparency, and impartiality.

TRIVI hires resources whose profiles effectively meet TRIVI's needs, operating - as for the management of resources already in the workforce - choices exclusively based on criteria of professionalism and competence and banning any form of favouritism.

Recruitment takes place in compliance with the legislation on labour law or any other provision in force and therefore on the basis of regular employment contracts, as no form of employment relationship is allowed that is not compliant or in any case elusive of the provisions in force.

In compliance with contractual regulations, equal job opportunities and professional developments are offered, based on skills, potential and professional qualifications without discrimination or favouritism, ensuring fair treatment based on individual skills and abilities.

Personnel receives accurate information on the characteristics of the function and the tasks to be performed, on the regulatory elements and the minimum wage levels as regulated by the applicable national collective labour agreement and receives the employment documents and any personal protective equipment.

Conflict of interests

In carrying out the activities, any situation in which the subjects involved in the transactions are, or may even appear to be, in conflict of interest or for serious reasons of convenience must be avoided. By conflict of interest, we mean the case in which an employee and/or collaborator works to satisfy an interest other than that of TRIVI to obtain a personal advantage.

Constitute, by way of example but not limited to and in addition to the cases defined by law, conflicts of interest:

- the exploitation of one's functional position for the realization of conflicting interests with those of TRIVI;
- the use of the information acquired due to or during one's work for one's own benefit or that of third parties.



The business

The company recognizes customer satisfaction as the fundamental element for the success of its business. This central objective is subordinate to the principles of legality, honesty, correctness, and transparency.

Quality and safety of the products

TRIVI attributes priority importance to the safety and quality of its products.

A selection of the raw materials and of the packaging is made to ensure the respect of the regulations of the countries where the product is to be sent. This is followed by a meticulous sequence of tests to which the finished products are subjected.

Protection of competition

TRIVI believes in correct and fair competition as a fundamental element for its development. In disputing market shares, it chooses to operate in respect of the principle of integrity and the respect of legislation on competition and anti-trust laws.

Money laundering and legality

TRIVI rejects any form whatsoever of money laundering from unlawful or criminal activities, undertaking to respect all the national and international provisions on money laundering.

In the same way, any form whatsoever of corruption, infringement of trust and undue appropriation is prohibited. Offering, directly or indirectly, money, gifts or benefits of any nature of any nature and kind, personally, to suppliers, to employees of the Public Administration, to third parties from whom undue advantages may be obtained, is strictly forbidden.

Acts of commercial courtesy are allowed on condition that they are of modest value and such as not to compromise the integrity and the reputation of one of the parties and not to influence the autonomy of the judgement of the recipient.

Only duly designated and authorized company functions may enter commitments with the Public Administration and with public institutions.

Relations with suppliers

The relations with suppliers are based on principles of transparency, loyalty, integrity, confidentiality, honesty, diligence, professionalism, and objectivity of judgement. The selection of suppliers is made based on an objective and transparent assessment.

TRIVI undertakes to ensure maximum vigilance with all the suppliers in relation to the observation of the Code of Ethics.

Accounting and management accuracy

TRIVI ensures that every transaction is based on adequate documentation and can be verified. The principles observed in accounting and management are correctness, completeness, and transparency, fully complying with the legislation currently in force.



Social responsibility

TRIVI considers Corporate Social Responsibility an integral part of the operating and managerial policy of the company. Some of the topics to which TRIVI is committed are:

Environmental sustainability

TRIVI considers the environment a primary asset to be safeguarded and plans its activities to this end by seeking a balance between economic initiatives and the essential needs of environmental protection.

TRIVI operates in compliance with current legislation and takes steps to limit the environmental impact of its activities.

TRIVI undertakes to comply with the obligations, prohibitions and restrictions regarding the use of specific substances, their disposal and recycling and to implement actions aimed at the continuous improvement of its performance in environmental matters, at the control and reduction of the use of dangerous substances, energy saving, water saving, minimization of waste production and recovery and recycling of the same.

TRIVI undertakes to verify the application of the environmental policy, to promote activities aimed at preserving the environment for future generations and enhancing natural resources.

Alcohol or drugs

TRIVI is committed to creating and maintaining a safe, healthy, and productive work environment.

The Company recognizes that the abuse - or improper use - of alcohol, drugs, and other similar substances by its employees and collaborators negatively affects their duty to perform efficiently and can have serious harmful consequences for them themselves, on the safety, efficiency and productivity of other employees and the Company.

The use, possession or distribution of alcohol and illicit drugs on Company premises is strictly prohibited.

Whistleblowing

To prevent and deter violations of public interests, the internal market, the environment, health, protection and welfare of animals, as well as environmental crimes and unlawful conduct TRIVI has designed and created a reporting channel that will be managed in a secure manner and such as to guarantee the confidentiality of the identity of the reporting person and the protection of any third parties mentioned in the report. The reports will be received by an impartial service competent to follow up on the reports.

The complete procedure for reporting can be found at the link www.trivi.it/en/whistleblowing





www.trivi.it