



CODE OF ETHICS OF CAMS Srl

CAMS Board of Directors formalized and adopted this document (CODE OF ETHICS) that describes the Company's fundamental values as well as the ethical rules that are followed by all managers, employees and partners, in the conduct of the Company's activities and in general in internal and external human relations.

CAMS CODE OF ETHICS is supported by Company Procedures, appropriately formalized and disseminated to all the stakeholders of the company, in order to make the principles and values enunciated effective in daily business practice.

These documents constitute the «Codes of Conduct» which establish the actual rules, do's and don'ts of both employees and all those who work on behalf of and for the Company.

The topics of the «Codes of Conduct» are related to the fight against corruption, for the respect of human rights, as well as for the prevention of the Administrative Responsibility of the Company (Legislative Decree 231/2001).

CAMS CODE OF ETHICS defines the fundamental principles related to the field of human resources, the field of business and the field of the market.

For each area, specific issues are outlined in which directors, employees, and partners carry out their daily activities with honesty and integrity for continuous improvement of interpersonal and social relationships as well as improved entrepreneurial results in the field of «Corporate Sustainability».

CAMS applies «Corporate Sustainability» as the result of the Company's set of policies aimed at pursuing business growth through the virtuous combination of the three dimensions (economic, social and environmental) related to «Sustainable Development» which is communicated through the «Sustainability Report».

CEOs

Monica BENEDETTO

Andrea BENEDETTO



THE BASIC PRINCIPLES OF THE CODE OF ETHICS IN THE HUMAN RESOURCES

HUMAN RESOURCES

1. RESPECT FOR PEOPLE

CAMS conducts the activities of its business processes with respect for the dignity of workers and their fundamental rights.

CAMS recognizes the centrality of human resources and promotes their training so that satisfactory personal fulfillment and professional growth can be achieved, ensuring equal opportunities for all.

CAMS is continuously committed to the respect of human rights in line with the «United Nations Guiding Principles», adherence to the «European Union Action Plan for Human Rights and Democracy," and applies the principles of the «National Action Plan (ITALY)» on business and human rights.

CAMS counteracts any form of discrimination based on religion, nationality, gender, sexual orientation, political opinion or otherwise, while promoting gender equality and cultivating meritocracy.

2. FAIRNESS IN RELATIONSHIPS BETWEEN PEOPLE

CAMS strives to ensure that relationships between people, both inside and outside the Company, are marked by honest, sincere and fair attitudes.

Honesty, sincerity and fairness also allow, in internal and external relations, not to be the recipients of partial truths, false statements, omissions or other forms of mystification of reality.

Directors, workers as well as external partners of CAMS perform their professional services according to diligence, accuracy and respect also in order to provide Clients with products and services that meet the necessary quality requirements.

CAMS develops its business processes in compliance with national and European laws and counteracts all forms of corruption against both private and public parties.



THE BASIC PRINCIPLES OF THE CODE OF ETHICS IN THE HUMAN RESOURCES

3. HEALTH AND SAFETY IN THE WORKPLACE

CAMS is continuously committed to safeguarding the Health and Safety of workers in the workplace through scrupulous compliance with legal regulations and technical standards referred to therein, as well as through information, education and training actions to increase the prevention of health and safety risks for workers.

This Health and Safety policy has led CAMS to obtain Management System certification according to the ISO 45001 technical standard.

Directors and workers are familiar with and comply with the rules for prevention and protection of their own health and safety as well as all employees' who may be affected by the performance of their activities.

4. CONFIDENTIALITY OF PERSONAL DATA

CAMS collects and treats properly the personal data of employees, collaborators, Customers, suppliers and other subjects, both natural and legal persons, of which it comes into possession.

CAMS guarantees the confidentiality of personal data subject to processing carried out internally as well as their protection with appropriate measures, in compliance with the provisions of the relevant European and national laws.

It also guarantees to any person the rights provided by the laws in force.

CAMS protects any non-public information related to the Company, its employees or third parties that establish a relationship with the Company.

For this reason, CAMS protects the integrity of its information systems and adopts appropriate corporate regulations in this regard.



THE BASIC PRINCIPLES OF THE CODE OF ETHICS IN THE COMPANY

COMPANY

1. LEGALITY AND INTEGRITY

CAMS considers the culture of legality (respect of laws) as a prerequisite for the growth and development of any Organization. For this reason, considering respect for rules a fundamental value for civil coexistence, CAMS acts to affirm full compliance with legal regulations in the national, European and international fields.

CAMS supports the spread of legality among all the recipients of this Code of Ethics and does absolutely not tolerate any action even minimally contrary to the rules.

CAMS, through its internal staff and external collaborators, exercises continuous and careful vigilance with commercial, administrative and institutional intermediaries and operates with the utmost integrity so that business negotiations do not give rise to behaviors or acts such as to recognize forms of active or passive corruption or forms of complicity in trafficking in illicit influences.

2. TRANSPARENCY AND TRACEABILITY OF ACTIVITIES

CAMS guarantees the transparent behavior of directors, and internal employees who operate objectively, in accordance with the Company's technical specifications and applicable technical and legal standards, and without any self-interested purpose.

With this commitment, each employee has an obligation to identify any risks of conflicts of interest and to act in accordance with the interests of the Company. CAMS has clearly and properly documented procedures and instructions identifying roles and responsibilities as well as ways of recording of activities, ensuring traceability of decision-making, authorization and implementation processes.



THE BASIC PRINCIPLES OF THE CODE OF ETHICS IN THE COMPANY

3. CONFIDENTIALITY OF DATA AND INFORMATION

CAMS guarantees the confidentiality and security of data and information generated internally during business processes and/or acquired from Clients and/or suppliers for business needs.

CAMS implements the protection of confidential know-how and confidential business information against unlawful acquisition, use and disclosures by applying the Directive (EU) 2016/943 implemented in Italy by Legislative Decree No. 63 of 2018.

CAMS expects the utmost confidentiality from workers and external collaborators so that no confidential information pertaining to the company itself, its products and production methods are disclosed to third parties or used in a way that is detrimental to the Company.

CAMS has developed, put into practice, and keeps up-to-date a data and information protection plan to protect them both from external attacks from computer networks, the main tools of digital communication, and from undue misappropriation in the case of paper media.

Therefore, administrators and employees work daily with behavioral and technological expedients to preserve the integrity of corporate data and information.

4. IMAGE AND REPUTATION PROTECTION

CAMS protects its image and reputation since they are components of its "social and relational capital" that constitutes a part of its intangible resource assets.

Protection is managed through the company's information and communication media.

Directors and employees work daily, with their own conduct and ethical behavior, to safeguard this heritage both in the workplace and outside of it, towards any person or institution.



THE BASIC PRINCIPLES OF THE CODE OF ETHICS IN THE COMPANY

5. PROTECTION OF INDUSTRIAL ASSETS

The facilities, tools, and work equipment that constitute both tangible and intangible, immovable or movable endowments owned by CAMS are used exclusively by employees legitimized by the Company for the fulfillment of institutional purposes, within the limits of their duties and guarded with the required diligence.

Employees are responsible for the protection of the resources entrusted to them and ensure their integrity and proper operation in accordance with company procedures.

CAMS uses network computing resources properly, in accordance with internal procedures and in compliance with the security measures adopted.

The management and use of the Company's and/or third parties' industrial assets is carried out in compliance with applicable copyright laws and regulations.

6. RESPECT FOR THE ENVIRONMENT

CAMS implements an environmental policy that has led the Company to obtain Management System certification according to the ISO 14001 technical standard as well as improved stakeholder confidence in the Organization's ability to protect and improve the environment.

Directors, employees and external partners operate in compliance with environmental legislative requirements.

CAMS develops its industrial processes in such a way as to ensure respect for and protection of the environment also through a reduction of negative physical effects (emissions into the atmosphere, wastewater, waste...) and at the same time a continuous stimulus to the growth of a sense of responsibility on the part of all employees and/or collaborators towards the environment.



THE BASIC PRINCIPLES OF THE CODE OF ETHICS IN THE MARKETPLACE

MARKET

1. PRODUCT QUALITY AND SAFETY

CAMS considers Customer satisfaction to be of paramount importance and therefore pays special attention to understanding their needs and preparing solutions that best meet their requirements.

CAMS effectively applies the Quality Management System in accordance with the ISO 9001 technical standard. This promotes the improvement of production processes and the quality level of products also by monitoring process performance indicators that are necessary to ensure the required level standard.

CAMS ensures quality standards of services/products offered in accordance with Clients' technical specifications by continuously monitoring their perceived quality.

2. RESPECT FOR CUSTOMERS AND SUPPLIERS

CAMS places Customer satisfaction at the foundation of its corporate values because it is fundamental to the continuity of its business model. For this reason, it promotes its relationships with Clients based on honesty, transparency and integrity.

CAMS directors and employees fulfill obligations and commitments to their clients, provide complete and truthful accurate information, and meet their reasonable expectations.

CAMS directors and employees, in conducting relations with Suppliers of goods and services,

follow the principles of this Code of Ethics, as well as internal procedures.

Suppliers are selected in compliance with the requirements of quality, price, convenience, capacity and efficiency, and all types of business relationships are governed by formalized contracts. In supply relationships, CAMS complies with applicable legal provisions and contractual conditions in line with the strictest business practices.



THE BASIC PRINCIPLES OF THE CODE OF ETHICS IN THE MARKETPLACE

3. FAIR COMPETITION

CAMS considers free competition an asset to be protected and recognizes that fair competition affects its reputation; it also recognizes that it is functional to the sustainable development of the company and the market in which it operates.

CAMS refrains from conducts designed to favor the conclusion of business to its own advantage in an unfair manner or in violation of laws, condemning any act carried out in violation of current regulations to protect it, even more so through the use of threats and/or violence.

CAMS refrains from making false statements, defaming and/or intentionally attacking competitors and avoids agreements, of any kind, with companies in the sector that could alter free competition.

4. CORPORATE SUSTAINABILITY

CAMS has adopted Corporate Sustainability ["the set of corporate policies that enable the Company to pursue a virtuous combination of the three dimensions (economic, social, environmental) of sustainable development"] as means of integrating environmental and social considerations into the strategy, processes and products of its business model.

CAMS plans its activities by seeking a balance between economic initiatives and unavoidable environmental and social needs, not only in compliance with current regulations, but also in consideration of the rights of future generations. CAMS publishes the Sustainability Report in the form of a voluntary Non-Financial Statement in accordance with Directive 2014/95/EU , implemented in Italy by Legislative Decree 254/2016.