

CODE OF ETHICS OF CAMS Srl

The Board of Directors of CAMS has formalised and adopted this document (CODE OF ETHICS) which describes the fundamental values of the Organisation as well as the ethical rules that are followed by directors, employees and collaborators, in any capacity, in the conduct of the Company's activities and in general in internal and external human relations.

The CAMS CODE OF ETHICS is supported by company procedures, which are duly formalised and disseminated to all stakeholders of the organisation, in order to implement the principles and values set out in the code in everyday business practice.

These documents constitute the "Codes of Conduct" , which establish the effective rules, the dos and don'ts for both employees and all those who work in the name and on behalf of the Organisation.

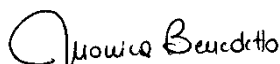
The topics covered by the "Codes of Conduct" relate to the fight against corruption, respect for human rights, and the prevention of the Company's Administrative Liability (Legislative Decree 231/2001).

The CAMS CODE OF ETHICS defines the fundamental principles relating to human resources, the company and the market.

For each area, specific topics are illustrated in which directors, employees and collaborators carry out their daily activities with honesty and integrity for the continuous improvement of interpersonal and social relationships, as well as for the improvement of business results within the framework of the "Corporate Sustainability".

CAMS applies the "Business Sustainability" as a result of the Company's 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".

Directors

Monica Benedetto 

Andrea Benedetto 



HUMAN RESOURCES

1. RESPECT FOR PEOPLE

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

CAMS recognises the central importance of human resources and promotes their training so that they can achieve personal satisfaction and professional growth, guaranteeing equal opportunities for all.

CAMS is continuously committed to respecting human rights in line with the “United Nations Guiding Principles on Business and Human Rights”, adhering to the “European Union Action Plan for Human Rights and Democracy”, and applying the principles of the “National Action Plan (ITALY)” on business and human rights.

CAMS combats all forms of discrimination based on religion, nationality, gender, sexual orientation, political opinions or other factors, while promoting gender equality and cultivating meritocracy.

2. FAIRNESS IN INTERPERSONAL RELATIONSHIPS

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

Honesty, sincerity and fairness also ensure that, in internal and external relations, we are not the recipients of partial truths, false statements, omissions or other forms of misrepresentation of reality.

CAMS directors, employees and external collaborators perform their professional duties with diligence, accuracy and respect, also with a view to providing customers with products and services that meet the required quality standards.

CAMS develops its business processes in compliance with national and European laws and combats all forms of corruption, both in relation to private parties and public entities.



THE FUNDAMENTAL PRINCIPLES OF THE CODE OF ETHICS IN THE AREA OF 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 the technical standards referred to therein, as well as through information, education and training initiatives to increase the prevention of risks to health and safety.

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

Managers and workers are aware of and comply with the rules for the prevention and protection of their own health and safety and that of all collaborators who may be affected by the performance of their activities.

4. CONFIDENTIALITY OF PERSONAL DATA

CAMS collects and processes the personal data of employees, collaborators, customers, suppliers and other individuals and legal entities in its possession in a correct manner.

CAMS guarantees the confidentiality of personal data processed internally and its protection with appropriate measures, in compliance with the provisions of European and national laws on the subject.

It also guarantees the rights of all persons under the laws in force.

CAMS protects any non-public information relating to the Company, its collaborators or third parties who establish a relationship with the Company.

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



THE FUNDAMENTAL PRINCIPLES OF THE CODE OF ETHICS IN THE BUSINESS SECTOR

BUSINESS

1. LEGALITY AND INTEGRITY

CAMS considers the culture of legality (compliance with the law) to be a prerequisite for the growth and development of any organisation. For this reason, considering compliance with the rules to be a fundamental value for civil coexistence, it acts to ensure full compliance with national, European and international legal regulations.

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

Through its internal staff and external collaborators, CAMS exercises continuous and careful supervision of commercial, administrative and institutional intermediaries and operates with the utmost integrity to ensure that commercial negotiations do not give rise to behaviour or acts that could be construed as active or passive corruption or complicity in the trafficking of illicit influences.

2. TRANSPARENCY AND TRACEABILITY OF ACTIVITIES

CAMS guarantees the transparent behaviour of its directors and internal employees, who operate objectively, in accordance with specific company technical specifications and applicable technical and legal standards, and without any personal interest.

With this commitment, every 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 established clear and appropriately documented procedures and instructions that identify roles and responsibilities as well as methods for recording activities, ensuring the traceability and verifiability of decision-making, authorisation and implementation processes.

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THE FUNDAMENTAL PRINCIPLES OF THE CODE OF ETHICS IN THE BUSINESS AREA

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 customers and/or suppliers for commercial purposes.

CAMS protects confidential know-how and commercial information against unlawful acquisition, use and disclosure by applying Directive (EU) 2016/943, transposed in Italy by Legislative Decree No. 63 of 2018.

CAMS requires its employees and external collaborators to maintain the utmost confidentiality so that confidential information relating to the organisation itself, its products and production methods is not disclosed to third parties or used in a manner that could harm the Company.

CAMS has developed, implemented and maintains a data and information protection plan to protect them both from external attacks from computer networks, the main tools of digital communication, and from unauthorised theft in the case of paper-based media.

For this reason, administrators and employees work daily with behavioural and technological measures to preserve the integrity of company data and information.

4. PROTECTION OF IMAGE AND REPUTATION

CAMS protects its image and reputation as they are components of its “social and relational capital”, which forms part of its intangible assets.

This protection is managed through the company's information and communication channels.

Directors and employees work daily, through their conduct and ethical behaviour, to safeguard this heritage both in and outside the workplace, towards every person or institution.



THE FUNDAMENTAL PRINCIPLES OF THE CODE OF ETHICS IN THE AREA OF THE COMPANY

5. PROTECTION OF INDUSTRIAL ASSETS

The plant, tools and work equipment that constitute the tangible and intangible, immovable or movable assets owned by CAMS are used exclusively by employees authorised by the Company for the achievement of institutional purposes, within the limits of their duties and safeguarded with the required diligence.

Employees are responsible for protecting the resources entrusted to them and guarantee their integrity and proper functioning in accordance with company procedures.

CAMS uses network IT resources correctly, 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 in accordance with the ISO 14001 technical standard , as well as an improvement in stakeholder confidence in the Organisation's ability to protect and improve the environment.

Directors, employees and external collaborators operate in compliance with environmental legislation.

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



THE FUNDAMENTAL PRINCIPLES OF THE CODE OF ETHICS IN THE MARKET AREA

MARKET

1. PRODUCT QUALITY AND SAFETY

CAMS considers customer satisfaction to be of primary importance and therefore pays particular attention to understanding their needs and providing solutions that best meet those needs.

CAMS effectively implements the Quality Management System in accordance with the ISO 9001 technical standard. This promotes the improvement of production processes and product quality, including through the monitoring of process performance indicators that are necessary to guarantee the required standard.

CAMS ensures the quality standards of the services/products offered in accordance with the technical specifications of its customers by continuously monitoring the quality perceived by them.

2. RESPECT FOR CUSTOMERS AND SUPPLIERS

CAMS places customer satisfaction at the heart of its corporate values, as it is fundamental to the continuity of its business model. For this reason, it promotes its relationships with customers based on honesty, transparency and integrity. CAMS directors and employees respect the obligations and commitments made to their customers, provide accurate, complete and truthful information, and meet their reasonable expectations.

In their dealings with suppliers of goods and services, CAMS directors and employees adhere to the principles of this Code of Ethics and to internal procedures.

Suppliers are selected in accordance with requirements of quality, price, convenience, capacity and efficiency, and all commercial relationships are governed by formal contracts.

In its supply relationships, CAMS complies with applicable legal provisions and contractual conditions in line with the most rigorous commercial practices.



THE FUNDAMENTAL PRINCIPLES OF THE CODE OF ETHICS IN THE AREA OF FAIR COMPETITION

3. FAIR COMPETITION

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

CAMS refrains from behaviour that favours the conclusion of business deals to its own advantage in an unfair manner or in violation of the law, condemning any act committed in violation of the regulations in force to protect it, especially 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 allow the Company to pursue a virtuous combination of the three dimensions (economic, social, environmental) of sustainable development’] as a tool to integrate 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 essential environmental and social needs, not only in compliance with current legislation, but also in consideration of the rights of future generations. CAMS voluntarily publishes its "Sustainability Report" in accordance with the "EFRAG-VSME" standards (December 2024 edition) and the document "SUSTAINABILITY DIALOGUE BETWEEN SMEs AND BANKS" (December 2024 edition) developed by the Sustainable Finance Roundtable sponsored by the Ministry of Economy and Finance (MEF).