



Code of Ethical Conduct

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1. The Ethical code of Conduct

Westrafo's mission is to design solutions for the energy market by adapting to the changing scenarios and innovations of the world market, creating greener products and improving the quality of energy production and distribution.

The fundamental principles that distinguish our relationships with our collaborators are the same that we apply to our customers: providing them with all the technical tools and opportunities to be successful and grow through a continuous improvement of our standards and objectives, together for a greener future of Energy.

Through its activity and its works Westrafo srl intends to:

- 1- Create value and develop the company in the long term, bringing innovation to the energy market and collaborating in the creation of a more sustainable future.
- 2- Contribute to the well-being and professional growth of their collaborators.
- 3- Transfer elements of innovation and economic and civil progress to the Community.

All in full compliance with the primary values of the company, such as loyalty and transparency. This Code of Ethical Conduct has been developed to ensure that Westrafo's ethical values are well understood and constitute the basic element of the corporate culture, indicating the standard of conduct of all collaborators of the Company in the daily performance of their activities.

Having a Code of Conduct means first of all ensuring respect for people. We want to guarantee equal dignity and treatment to all those who contribute to creating and promoting our products, as well as providing a series of tools that allow our people to transmit, in turn, the ethical values on which the Company's reputation is based. inside and outside the workplace.

The primary objective of the Westrafo Code of Ethical Conduct is to develop in all the stakeholders of the Company the ability to share and disseminate behavior in support of sustainable growth, encouraging understanding and respect for diversity and spreading a true culture of integrity.

These are the values that have been the basis of our daily actions since the birth of the company. It is evident, as well as a source of pride for all of us, how much Westrafo has grown in recent years far beyond the Italian borders, transforming itself into a reality that acts and competes in the global market.

This obviously entailed a sharp increase in the complexity of our actions in geographical, legislative and cultural terms, imposing more stringent standards of conduct capable of responding effectively to new and multifaceted regulatory needs.

The setting and contents of our Code of Conduct not only incorporate this complexity, but also aim to consider situations that could emerge in the near future.

This Ethical Code of Conduct does not replace the current Disciplinary Code, but integrates it and is its foundation. We therefore ask all those who work on behalf of Westrafo to adopt the indications contained in this Code, thus contributing to the process of continuous strengthening of the trust that our stakeholders place in our Company, starting from the principle that only by respecting others is respect obtained.

2. Respect and diffusion of the Code of Ethical Conduct

2.1 Publication, application and updating of the Code

Westrafo is committed to those involved in the application of the Code of Ethics to:

- Make it available to everyone.
- Prepare adequate support tools to provide clarifications regarding the interpretation and implementation of the provisions contained in the document
- Adopt an appropriate sanction system to target any violations
- Ensure the confidentiality of the identity of those who report any violations, without prejudice to legal obligations, and their professional protection
- Periodically check compliance with and observance of the Code of Ethics and Conduct.

All Westrafo collaborators must receive a copy of this document (and future updates) by signing the relative delivery certificate.

The Code is posted on company notice boards in a position accessible to all Employees.

Furthermore, the Code can be consulted by all interested third parties and freely downloaded from the company website.

Westrafo expects the behavior of all its Stakeholders (read: people participating in the Company) to be consistent with the contents of this Code.

2.2 Commitments of collaborators and collaborators to respect the Code

The Code of Ethics and Conduct is an integral part of the employment relationship.

This Code applies to all Members of the Board of Directors, Directors, Managers, Employees and Third Parties who carry out business with and on behalf of Westrafo, whether directly or not directly employed by the Company, in all countries in which it operates.

All collaborators and collaborators therefore undertake to:

- Act and behave in line with what is written in the Code of Ethics and Conduct
- Report any violations of the Code as soon as they become aware of them.
- Collaborate in defining and respecting internal procedures, created to follow up the Code of Ethics and Conduct.
- Discuss with their Managers for any request for support and explanation of the document if a company policy or procedure is not clear.

3. Our ethical principles

3.1 General principles

Westrafo operates in the free market and is oriented towards honest and fair profit. Nonetheless, pure profit is neither the only nor the main purpose of the company.

In fact, we recognize our orientation towards innovation, the development of our employees and customer care as primary, and we orient ourselves in our choices and strategies in a manner consistent with this approach.

- Westrafo undertakes to respect the laws and to maintain an ethically correct behavior towards workers, tax authorities, supervisory bodies and institutional bodies.
- The investments are decided with particular attention to the long-term development of the company, the creation of new activities and jobs.
- Westrafo is committed to creating working conditions that favor attention and enhancement of the person through:
 - ✓ management and organization capable of promoting both teamwork and individual growth;
 - ✓ the definition of personal development plans to make the best use of the talents of each worker by encouraging their creativity, the assumption of responsibility and participation in defining and achieving company objectives;
 - ✓ compliance with the legislation on safety, health, hygiene and respect for working hours
- Westrafo is committed to creating the conditions for the development of a culture of reciprocity among its employees, consultants, collaborators and partners, and a climate of trust in which it is natural to freely make available one's talents, ideas and skills to the advantage of the professional growth of colleagues. It acts equally towards its employees, from whom it expects equal behavior.
- Westrafo works paying attention to the effects on the environment and to saving energy and natural resources. We therefore undertake to operate in compliance with current regulations, applying the best possible technologies, to promote and plan our activities in respect of the protection of the environment, preserving it for future generations.
- Westrafo puts in place all appropriate means to:
 - ✓ offer useful and quality goods and services at fair prices;
 - ✓ work professionally to build and strengthen good and sincere relationships with customers, suppliers and partners;
 - ✓ deal fairly with competitors by presenting the actual value of their products and services and refraining from putting the products or services of others in a negative light

3.2 The five guiding values of Westrafo

3.2.1 Loyalty

Relations with the outside world, relations with one's own collaborators and those between the latter must be based on the utmost loyalty, which consists in respecting the given word, in acting with a sense of responsibility, in the enhancement and protection of company assets, and in having an attitude of good faith in every action and decision.

People engaged in any capacity in collaboration with the company maintain a behavior of active loyalty towards Westrafo, which is expressed both by avoiding personal considerations that are harmful or offensive to third parties, and by respecting and listening to each person and their role, regardless of personal opinions; moreover, loyalty is manifested by using discretion towards corporate information.

3.2.2 Transparency

All actions, operations, negotiations and, in general, the behaviors put in place in the performance of the work activity, must be based on maximum management correctness, completeness and transparency of information, legitimacy under the formal and substantive aspect and the clarity and consistency of the accounting and information reports.

People do not use for personal purposes information, goods and equipment they have in the performance of the function or assignment assigned to them. Each person does not accept or make for themselves or for other pressures, recommendations or reports that may harm the company or undue advantages for themselves, for the company or for third parties. Each person rejects and makes no promises of undue offers of money or other benefits. The company undertakes to operate in a clear and transparent manner, without favoring any interest group or individual.

3.2.3 Personal Responsibility

Each person is required to carry out their work and performance with diligence, efficiency and fairness, making the best use of the tools and time at their disposal and assuming the responsibilities related to the obligations within their competence. Being responsible means having appropriate behavior, carrying out one's work in the best possible way, taking into account the needs of customers and the company, and working according to one's objectives with a sense of duty, a proactive attitude and a sense of responsibility towards the role that one is called to perform.

Everyone is required to ensure that the professionalism consolidated over the years becomes not only an individual but a corporate asset. In this logic of service and collaboration, each employee is required to work in a group in full harmony and synergistic integration with their collaborators.

The company wants to constantly encourage team work in order to promote the diffusion and integration of individual professional skills; this will have a beneficial multiplier effect in terms of results and therefore the ability to offer efficient and effective solutions.

3.2.4 Legality:

All collaborators and collaborators are required to comply with current regulations and internal company rules, applying them with integrity and fairness.

Westrafo accurately and completely records all company activities and operations, in order to implement the maximum accounting transparency towards the shareholders and external bodies in charge and to avoid false, misleading or deceptive entries. The administrative and accounting activity is carried out with the use of IT tools and procedures that optimize their efficiency, correctness, completeness and correspondence to the accounting principles, as well as favor the necessary controls and checks on the legitimacy, consistency and adequacy of the decision process. , authorization, performance of the Company's actions and operations. Westrafo believes that the correctness and transparency of company financial statements are important values.

Westrafo provides the utmost cooperation at all levels, providing correct and truthful information on company activities, assets and operations, as well as on any reasonable request received from the competent bodies.

3.2.5 Respect for people's dignity

Westrafo respects people's fundamental rights by protecting their moral integrity and ensuring equal opportunities. In internal and external relations, behaviors that have a discriminatory content relating to sexual orientation, religion, age, nationality, gender, state of health and, in general, any intimate characteristic of the human person, are not allowed and will be prosecuted.

Employees and Managers are therefore called to:

- Always treat all colleagues with respect.
- Do not make jokes or use language or take part in activities that may be offensive to others.
- As a Director or Direct Manager or Employee manage your position in Westrafo and participate in any project, process, event or activity, establishing and maintaining an environment free of discrimination (including cases of harassment, bullying, retaliation).
- As a Director or Direct Manager, supporting the Company in ensuring, as far as possible, good gender and minority representation among Westrafo Employees.

Westrafo is committed to respecting the principle that all people must have equal access to jobs, facilities, services and programs, regardless of personal characteristics and conditions that are not related to performance, competence, knowledge or qualification.

Westrafo aims to create an inclusive environment in which differences are experienced as a value.

4. The ethical standards of conduct in the company

4.1 Relations with collaborators and employees:

Westrafo attaches the utmost importance to those who perform their activity in the company. It is through our collaborators that we are able to develop and guarantee our services and create added value. Beyond the standards and principles established by the Universal Declaration of Human Rights, as well as the provisions of the applicable legislation on labor law, it is of primary interest of Westrafo to favor the development of the potential of each resource and his professional growth. through various tools.

For this reason, management and team leaders agree on the following rules in the relationship with their collaborators:

- respect, also in the selection stage, for the personality and dignity of each individual, avoiding the creation of situations in which people may find themselves in conditions of hardship;
- the prevention of discrimination and abuse of all kinds deriving from diversity of ethnicity, religious belief, political and trade union membership, language, gender, sexual orientation and handicap;
- continuous training and information appropriate to each one's position;
- the definition of roles, responsibilities, proxies and availability of information such as to allow everyone to make the decisions that fall within the interests of the company;
- a prudent, balanced and objective exercise, by the managers of specific activities or organizational units, of the powers associated with the delegation received;
- the enhancement of the innovative spirit, in compliance with the limits of each person's responsibilities;
- clear, precise and truthful internal communication on company policies and strategies;
- correct and confidential use of personal data and sector information;
- workplaces suitable for guaranteeing safety, health and comfort for those who use them.

4.2 Specific duties of the heads of corporate functions

With regard to the above, Direct Managers of other HRs have a particular responsibility in respecting and enforcing this Code.

The behavior of each sector manager or company function must therefore comply with the values of this Code of Ethics and represent an example for their collaborators.

They establish relationships with their collaborators based on mutual respect and fruitful cooperation, favoring the development of the spirit of belonging to Westrafo.

Specifically, they are responsible for creating and maintaining a work environment in which all collaborators are made constantly aware of the behavior required by the Code of Ethics.

This is why Westrafo expects every Team Leader and Manager to be able to adapt to the highest standards of ethical conduct and encourage knowledge of the ethical and legal implications relating to employment decisions.

The motivation of employees and the diffusion of corporate values, in order to allow them to be internalized and shared, are essential: in this perspective, the commitment lies in the implementation and maintenance of correct, valid and motivating information flows, capable of passing on to the employee the awareness of the contribution made to the company activity by each of the resources involved.

More specifically, each sector manager or company function is obliged to:

- Represent an example with their behavior for employees in their sector or company function and direct these employees to comply with this Code of Ethics;
- Work to ensure that they understand that compliance with the rules of this Code of Ethics is an essential part of the quality of work performance;
- Report to the company management the information provided by employees or their own findings regarding possible cases, even doubts, of violation of the rules of the Code of Ethics.

4.3 Relations between colleagues and towards superiors

Relations between colleagues and towards superiors are set up according to these general rules that refer to the ethical principles of Westrafo, which incorporate and integrate what is reported in the Code of Conduct and company regulations, in turn complying with the rules contained in the CCNL Metalmeccanica Industria (the National Contract applied in Westrafo).

- Respect always and in any case for each person and their role within the Company.
- The attitude and language appropriate to one's role, the professional and business context and the situation;
- Behavior free from discrimination and abuse of any kind, for example on the basis of ethnicity, religious belief, political and trade union membership, language, gender, sexual orientation and disability;
- The honesty and transparency of the information shared within the company, which must always be used in the best possible way to ensure the success of the team and the development objectives of Westrafo, without being used with ulterior motives or in a malicious or divisive way;
- Taking Responsibility in one's duties at the same time as the company objectives, cooperating with colleagues with a proactive and synergistic attitude;
- Discretion and common sense in the use of company information, which must be treated with general confidentiality, especially with regard to relations with the outside world;
- Attention to environmental issues and environmental protection, each in its role and tasks as well as in the common areas;

Each employee of the company has the responsibility to acquire knowledge of the laws and regulations that affect their duties in order to recognize potential risks and know when to ask for company support.

Each employee will have to base his / her activity, whatever the level of responsibility connected to the role, at the highest degree of efficiency, complying with the operating instructions given by the higher hierarchical levels and will have to contribute with colleagues and superiors to the pursuit of common objectives.

5. Relations with the outside world

In general, when dealing with external parties and persons in Westrafo:

- Do not say or imply that you represent the Company if you are not actually and officially authorized to do so or if the specific function held in Westrafo does not require it.
- In the event that Westrafo has authorized the individual to speak on behalf of the Company or the specific role that is held in the Company requires it, do not emphasize or mention unfounded arguments, provide accurate and truthful information and clearly state the facts to avoid misunderstandings on the content of the communication.

5.1 Relations with customers

Westrafo directs its business to the satisfaction and protection of its customers, paying attention to requests that can favor an improvement in the quality of products and services. For this reason, Westrafo directs its research, development and marketing activities to high quality standards of its products and services.

In relations with customers and clients, Westrafo ensures fairness and clarity in commercial negotiations and in the assumption of contractual obligations, as well as faithful and diligent contractual fulfillment.

These relationships must be based on principles of mutual transparency, compliance with market and antitrust rules, through reliable and correct behavior and ensuring complete and accurate information on the products and services offered.

The company also bases the excellence of the products and services offered, on attention to customers and the willingness to satisfy their requests. The objective pursued is to ensure an immediate, qualified and competent response to the needs of customers by standardizing their behavior with fairness, courtesy and collaboration.

5.2 Relations with suppliers

Westrafo suppliers are considered as valuable business partners and key contributors to the achievement of the Company's objectives. Business relationships must be managed taking into account the principles and values indicated in the previous paragraphs.

The Company makes use of suppliers who operate in compliance with current legislation and the rules set out in this Code. The selection of suppliers and the determination of the purchase conditions must be based on an objective assessment of the quality, the price of the goods and services offered, the ability to promptly supply and guarantee goods and services of an adequate level to the needs of the Company.

- In no case should a supplier be preferred to another due to personal relationships, favoritism, or advantages, other than those of the exclusive interest and benefit of the Company.

- In particular, the suppliers of machinery and equipment must also be selected on the basis of the compliance of the supplies in compliance with the regulations on safety and hygiene at work. The supplies of personal protective equipment and in any case of general safety and prevention devices will comply with the obligations regarding certification and suitability, both general and specific, in relation to the intended use.

5.3 Relations with Institutions and Public Administration

In relations with the Public Administration, Westrafo pays particular attention to every act, behavior or agreement, so that they are based on maximum transparency, correctness and legality.

In the course of business negotiations, requests or commercial relations with the Public Administration, no conduct will be held, directly or indirectly, that could incorrectly influence the decision of the counterparty. In particular, it is not permitted to examine or propose employment and / or commercial opportunities that may benefit Public Administration employees in a personal capacity, or to solicit or obtain confidential information that may compromise the integrity or reputation of both parties. During the execution of business relationships, the provisions of the contract must be respected, avoiding unauthorized replacements and arranging adequate control and safeguard mechanisms and using only the collaboration of competent and adequate people.

- It is explicitly forbidden to allocate disbursements, contributions, loans, reliefs received from national or EU or non-EU public bodies for purposes other than those for which they are intended. The company does not provide contributions, advantages or other benefits to political parties and workers' trade unions, nor to their representatives or candidates, without prejudice to compliance with the applicable legislation.
- It is forbidden in any case to offer gifts, hospitality and entertainment expenses (regardless of their value) to officials / employees of the Public Administration.
- Similarly, any facilitating payment (amount given to an official / employee of the Public Administration to speed up routine government procedures such as those for issuing visas) is prohibited.
- It is forbidden to pay the expenses of an official / employee of the Public Administration, including those for business travel.

5.4 Gifts

Acts of commercial courtesy, such as gifts or forms of hospitality, are permitted as long as they are of modest value and in any case such as not to compromise the integrity and reputation of one of the parties and do not affect the recipient's independence of judgment.

Likewise, employees cannot receive gifts or special treatments, except within the limits of normal courtesy relations and provided they are of modest value (in this case quantified in € 50).

If an employee receives gifts beyond the aforementioned limits, he must immediately notify his superior who will immediately arrange for the return or the most appropriate use of what has been received, and to inform the donor of the Company's principles on the matter.

6. Sostenibilità e Responsabilità sociale di impresa

At Westrafo, we believe that, in a global scenario, economic performance and social development are the interdependent keys to the company's competitiveness and sustainability.

Westrafo's global approach to Corporate Social Responsibility is inspired by the following international standards: the UN Universal Declaration of Human Rights, the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, the OECD Guidelines for Multinational Enterprises.

Corporate Social Responsibility is the way in which Westrafo intends to emphasize the social impact of its industrial and corporate structures, affirming the principles and values that guide it both with internal processes and methods and with interactions with other subjects.

Westrafo is committed to protecting the health of its people, natural resources and the environment. In fact, Westrafo actively promotes sustainable and responsible industrial development, which is appreciated by local communities. This commitment goes beyond compliance with the law, favoring the integration of best environmental practices in all business decisions.

All production phases are required, as far as technologically possible, to reduce the environmental impact: particular attention is paid to the application and constant development of technologies that allow energy and water savings, the reduction of emissions, including greenhouse gases, and the adoption of waste recycling strategies.

All products manufactured within the supply chain must meet the highest environmental standards of the relevant market segment, both for the materials and substances used and for the related manufacturing processes. For the design and development of products and production processes, Westrafo is actively engaged in the search for increasingly advanced technological solutions, aimed at reducing waste and pollutants, conserving resources and recycling materials, in order to promote sustainable development and minimize the environmental impact

- Each Employee must therefore actively contribute to reducing waste and pollutants, conserving resources and recycling materials. In particular, it undertakes to:
 - separate waste, in accordance with the procedures in force at the various sites,
 - minimize water consumption
 - reduce energy consumption as much as possible.
- Each Direct Manager must promote environmental awareness, raising employees' awareness on environmental sustainability issues, and ensure that they adopt responsible behavior to reduce the environmental impact in the workplace.

For the complete list of Westrafo's commitments in favor of environmental sustainability and environmental protection, see the Westrafo Environmental Code - steps towards a greener future.

7. Workplace safety

Respect for individual and collective health is one of the imperative principles that govern all the activities of Westrafo and, therefore, cannot be violated in any corporate decision or by any Employee.

Westrafo pursues these primary objectives by implementing state-of-the-art technologies in all its structures and through specific training and communication activities aimed at raising the awareness of all Company employees on these aspects.

Zero-accidents is Westrafo's main safety priority in all its plants. Westrafo pursues this objective by committing itself to guaranteeing the safety of all its offices and plants in accordance with the highest applicable standards and by promoting awareness of this primary objective in all its Employees.

Employees and Managers are therefore called to:

- Help Westrafo to protect their own health and that of colleagues and to ensure the safety of everyone in the workplace, by being an active and diligent part.
- Never for any reason neglect a product or workstation situation that is potentially hazardous to your health and safety or that of any other person.
- Inform your Direct Manager or whoever takes his place of any unsafe or risky conditions, respecting the procedures defined in your workplace.
- Each Direct Manager must ensure that the information relating to any risky or unsafe situation is adequately managed by the persons in charge.

This Code of Ethical Conduct takes up and develops the issue of workplace safety and related provisions already dealt with in the Company Code of Conduct and Disciplinary, which indicates all the rules of conduct aimed at ensuring compliance with the safety of all workers in Westrafo and the safeguarding company assets and human resources.

8. Protection of privacy and management of company information

The obligation of transparency cannot and must not constitute an exception to the principles of confidentiality and the obligations regarding the protection of privacy and therefore the information is processed by Westrafo in full compliance with the confidentiality and privacy of the data subjects. Compliance with the principles and obligations of the privacy code 196/03 and the GDPR 2016/679 means that all offices guarantee the protection of personal data, not only ensuring the right to privacy of the same but also that of the person to know and control the circulation of information concerning you;

- the processing of personal data according to the principle of the "necessity" of processing for the performance of company functions and, if the data are sensitive, "only" if the processing of the same is required by an express provision of law or regulation; treatments and storage times are also respectful of the principles of lawfulness, transparency, proportionality and purpose.
- information on the purposes and methods of processing, on the mandatory or optional nature of the provision of data, on the consequences of any refusal to respond, on the identification details of the owner and manager or persons in charge of data processing;
- data security through the adoption of "minimum security measures" for the protection of data against the risk of destruction or loss, unauthorized access or processing that does not comply with the purpose of collection.

8.1 Managing Business Information

"Information" means all data, documents, knowledge and elaborations, of any nature, kind and on any medium, referring or referable to Westrafo, its Directors, Managers and / or Employees or to Westrafo's activities in any capacity and in any area.

By "Confidential Information" we mean all information that, in addition to corresponding to the aforementioned definition, cannot objectively be considered in the public domain and / or are cataloged as such. As a general rule, all information and all Confidential Information must be accessible only to Employees or other specifically authorized persons, in accordance with the applicable company rules and procedures / policies.

Among the Confidential Information, the "Confidential Information" is of particular importance. Confidential Information means information of a precise nature, which has not been made public, concerning, directly or indirectly, one or more issuers of financial instruments or one or more financial instruments, which, if made public, could have a significant effect on the prices of such financial instruments. Information is considered to be of a precise nature if it refers to:

- a) a series of circumstances which exist or which can reasonably be expected to arise;
- b) to an event which has occurred or which can reasonably be expected to occur;

c) and whether such information is sufficiently specific to allow conclusions to be drawn on the possible effect of said set of circumstances or of said event on the prices of financial instruments.

By way of example only, Confidential Information constitutes: financial results, new products and plans or acquisition strategies that are not yet in the public domain.

All Employees and in particular the Managers are therefore required to:

- Take appropriate measures to ensure the confidentiality and security of Westrafo Information, with particular attention to that received by virtue of their role and function / because of their position within the Company, always protecting Westrafo's confidential information.
- Before sharing the Company's Confidential Information with suppliers and / or business partners, it will be necessary to ensure that a confidentiality agreement / clause approved / approved by the General Management has been signed between the parties.
- In the absence of explicit authorization from the Company, do not access systems or databases that contain information, such as, but not limited to, personal data of suppliers, customers and Employees.
- When accessing or sending personal data, make sure that they are not disclosed to unauthorized third parties.

Based on the Confidential or Confidential Information acquired by virtue of your position in Westrafo, avoid, directly or indirectly through third parties:

- Buying or selling any financial instrument or undertaking any other commercial or financial transaction for the purpose of securing benefits, revenues or profits;
- Disclosing Inside Information outside the Company to take advantage of any kind, direct or indirect, immediate or future, personal or financial.
- Damaging the corporate reputation by disclosing Confidential information, false information or personal opinions related to one's role / job and related confidential information that is detrimental to the corporate reputation;

8.2 Intellectual Property of Westrafo Information

The property rights on the knowledge developed in the workplace of Westrafo belong to the latter, which has the right to use it as such in accordance with applicable laws.

Each Employee is required to actively contribute, within the scope of their functions and responsibilities, to the protection and management of intellectual property in order to allow its development, protection and growth. Furthermore, in doing so, each Employee must refrain from

using the Company's intellectual property or from allowing others to use it for personal purposes, paying attention to prevent behavior that could be prejudicial to Westrafo's industrial property or trade secrets, protecting the rights of the Company against possible violations.

In addition, all Employees must refrain from altering or counterfeiting patents, designs and / or industrial projects, in any way, and from using altered or counterfeit patents, designs and / or industrial projects.

- Should it be necessary to disclose Confidential Information to third parties, by virtue of one's position within the Company, for a transaction, it is mandatory to officially inform the Management in order to ensure the implementation of adequate protections.
- In the case of development of a new product or process within Westrafo, it is necessary to verify that there are no violations of third-party intellectual property rights.
- It is forbidden to use Company resources to offend, harass or threaten other people or to access, post or store illegal or offensive material in a broad sense.
- You may not use Company assets to reproduce, display, distribute or store materials that infringe any trademark, copyright, license or other intellectual property right.
- It is forbidden to copy software authorized and / or developed internally by the company on devices other than the original ones.
- It is forbidden to share software or documents developed internally by Westrafo without proper prior authorization;

9. Sanctions in case of violation of laws, rules and company directives

Failure to comply with the rules of the Code by the Recipients involves different penalties depending on the role of the Recipient concerned, in addition to compensation for any damage resulting from such non-compliance.

Compliance with the requirements contained in this Code by Employees and Collaborators is added to the general duties of loyalty, correctness, execution of the employment contract in good faith, and is also required on the basis and for the purposes of art. 2104 of the Civil Code ("Employee diligence").

Violations of the rules of this Code constitute a breach of the obligations deriving from the employment relationship, with all contractual and legal consequences, also with reference to the relevance of the same as a disciplinary offense and / or the preservation of the employment relationship.

Compliance with the Code is an absolutely necessary requirement for Westrafo srl and for all its Employees and Collaborators.

Westrafo trusts that all Employees and Collaborators are aware of the laws that affect their business. Westrafo srl also trusts that the Department Managers will provide the instructions and advice necessary for adhering to this Code.

This Code of Ethical Conduct does not constitute or imply in any form a condition of employment or a guarantee of use. The employment relationship may be terminated according to the terms of the same and in accordance with the applicable regulations.

The rules contained in this Code of Ethics do not represent an exhaustive list of the rules adopted by Westrafo, nor an exhaustive list of the types of behavior susceptible to disciplinary measures, including dismissal.