



CODE OF ETHICS

GENERAL PRINCIPLES OF CONDUCT



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CODE OF ETHICS

Introduction

The purpose of the Code of Ethics is the expression of the deontological principles of conduct, which the Company as a whole, and therefore directors, managers, shareholders, employees and collaborators in any capacity, must respect and recognize as their own in carrying out the activities of ECO CIS SRL (hereinafter the Company).

The code establishes the moral rights and duties and the ethical-social responsibility of each participant in the organization within the scope of their respective competences and in relation to the position and position held, making the principles of ability, legitimacy and fairness prevail.

The behavior of anyone who tries to appropriate the benefits and collaboration of others, exploiting positions of power or strength, is unethical.

Unethical conduct in business compromises the reputation of the same, hindering, consequently, the pursuit of the mission, aimed at the growth of the Company itself, and the satisfaction of customers.

The company condemns any type of conduct that is contrary to or violates the laws in force.

Mission

The company name "ECO CIS SRL, Solutions to Environmental Problems", sums up the company's mission: the commitment to find eco-sustainable solutions, in accordance with Goal 12 of the 2030 Agenda, in respect of the ecological sphere understood as the search for solutions that protect man and nature; in a word, that they protect the environment.

The activity of ECO CIS Srl has been developing since 2017.

In just a few years, it has specialized in its activity of brokering hazardous and non-hazardous waste without detention, offering an increasingly wide range of end-destination facilities ready to receive considerable quantities of industrial waste.

To carry out its activities, it is registered in category 8 class B of the National Register of Environmental Managers with number FI29041 (annual total amount of intermediated waste equal to 200,000 tons).

The company has structured an organization composed by people (operators and technicians) trained and specialized in the various categories, with many years of experience.

The team works in synergy to solve all environmental problems, in particular:

Inspections are carried out for the collection of information and sampling (the staff is certified for sampling in accordance with the provisions of the German LAGA PN 98 and Italian UNI 10802:2013 standards);

The correct classification of the waste is evaluated on the basis of the chemical-physical analyses provided by the customer;

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The destination plants (disposal/recovery) best suited to the characteristics of the waste are selected and shared;

The adequacy of the legislative, technical and economic conditions of the selected plants is verified;

The most optimal logistical modalities are evaluated;

The procedures for the technical approval of the waste at the final plant are managed;

Procedures for the cross-border shipment of waste (notification procedure or simplified procedure) are developed;

The transport and logistics of the individual consignments are managed;

In general, the entire disposal/recovery process is managed until the completion of the activity;

Assistance is given in relations with public and private authorities, both Italian and foreign.

Acknowledging the centrality of people and the environment, the Society considers respect for their autonomy and the incentive based on their participation in business decisions to be fundamental factors for the development of the Company itself and promotes its development and professional growth to increase the wealth of skills and excellence.

The Management plans and carries out periodic training and information activities to enhance individual professionalism and increase skills.

Scope of application

The provisions of the Code apply, without exception, to all the employees, as well as to natural and legal persons who are into collaboration (even temporary) with the Company.

This code also applies to all natural and legal persons who hold functions of representation, administration, management of the Company or of one of its organizational units, as well as to those who exercise the management and control of the same.

Recipients are required to ensure compliance with the ethical and sustainability principles contained in the Code, assuming responsibility for any violations of the Code, both towards the Company and externally.

Recipients are required to know and comply with the Code in the interest of transparency and the company's reputation.

The Company orients its activities to the principles contained in this Code; it also declares that it is free and does not undertake or continue any relationship with anyone who demonstrates that do not agree with the content and spirit of the Code of Ethics and violates its principles and rules of conduct.

The Company undertakes, through its managers and employees, to update the Code and to disseminate it among all those with whom it has business relations.

The Code is available in electronic format on the ECO CIS website.



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Principle of legality and honesty

PRINCIPLE 1:

The Company's mandatory principle is to comply with the laws, regulations and rules in force, in all the countries in which it operates.

PRINCIPLE 2:

Under no circumstances the pursuit of the Company's interest can justify dishonest conduct.

Principles in relations with the Public Administration

PRINCIPLE 3:

Shareholders, managers, employees, consultants and collaborators, third parties acting in the name and on behalf of the Company in relations with the Public Administration, whether Italian or foreign, shall adopt appropriate conduct in order not to induce the Public Administration to violate the principles of good administration and impartiality to which it is bound.

Relations with the Public Administration, whether Italian or foreign, are limited to those who are specifically and formally appointed by the Company to deal with or have contact with such administrations, bodies, organizations and/or institutions and its public officials.

PRINCIPLE 4:

Persons appointed by the Company to maintain relations with the Italian and/or foreign Public Administration, for any reason may not engage in conduct which illegitimately influence the decisions of Public Officials or Public Service Persons who make decisions in the name of the Italian or foreign Public Administration, in order to obtain an illicit interest or undue advantage for the Company.

PRINCIPLE 5:

The Company prohibits and condemns any conduct consisting in directly or indirectly promising or offering money or other material goods (gifts) and benefits to Italian or foreign Public Officials and/or Public Service Officers, from which the Company may derive an illicit or undue advantage or interest.

PRINCIPLE 6:

It is forbidden to allocate contributions, subsidies or loans obtained from the State or other public body or from the European Community for purposes other than those for which they were granted, even if of modest amount and/or value.

PRINCIPLE 7:

The Company may not be represented in relations and in the conduct of any activity with the Public Administration, Italian or foreign, by third parties when, on the basis of the information available, a conflict of interest may arise.

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Principles of the Organization

PRINCIPLE 8:

Every operation and/or transaction, understood in the broadest sense of the term, must be legitimate, authorized, consistent, congruous, documented, recorded and at all times verifiable.

PRINCIPLE 9:

Employees and persons who make any purchase of goods and/or services, including external consultancy, on behalf of the Company, must act in compliance with the principles of fairness, cost-effectiveness, quality and lawfulness.

PRINCIPLE 10:

The evaluation of the personnel to be hired must be carried out on the basis of the correspondence of the candidates' profiles and their specific skills, with respect to the company's needs (verification of psycho-aptitude aspects).

The Company encourages and promotes equal opportunities between women and men in the selection and treatment of employees and collaborators, in top positions, in salaries and duties.

Priority and constant commitments are:

- The protection of equal opportunities;
- Respect and attention to the disabled;
- Risk prevention;
- The protection of the environment and the prevention of all forms of pollution;
- Health and safety in the performance of work activities.

For the above, the company continuously implements actions aimed at verifying and evaluating the services offered in order to prevent any possible dissatisfaction and operate in continuous improvement, aware that none of the operational objectives can be achieved by people individually.

To this end, organizational clarity and transparency, sharing and communication are key.

In relations between employees, the Company requires maximum willingness to help each other, in the common interest of company productivity.

Any type of information learned in the performance of one's duties must not be reported externally, even if apparently, it does not appear to be confidential.

PRINCIPLE 11:

The Company is committed, in its activities, to respecting the principles of safeguarding the planet and improving people's quality of life.

The Company complies with all national and EU legislation, on the environment and energy, as it is relevant to its business. ECO CIS is attentive to the evolution of regulations on the subject, in order to be able to promptly adapt and operate legally.

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Principles of good administration

PRINCIPLE 12:

The Company condemns any conduct, by whomsoever put in place, aimed at altering the correctness and truthfulness of the data and information contained in the financial statements, reports or other corporate communications required by law addressed to shareholders and the public.

The Company requires directors, department heads and employees to behave correctly and transparently in the performance of their duties.

PRINCIPLE 13:

It is forbidden to engage in any voluntary conduct on the part of the Company's Directors aimed at causing damage to the integrity of the company's assets.

PRINCIPLE 14:

The Directors must not carry out any type of corporate transaction that could cause damage to creditors.

PRINCIPLE 15:

It is forbidden to carry out any act, simulated or fraudulent, aimed at influencing the will of the members of the shareholders' meeting to obtain the irregular formation of a majority and/or a resolution different from the one that would have occurred.

PRINCIPLE 16:

It is forbidden to intentionally spread false news both inside and outside the Company, concerning the Company itself, its partners, employees, collaborators and third parties who work for it, with full awareness and knowledge of their falsehood.

PRINCIPLE 17:

The Company's bodies and their members and employees, on the occasion of audits by the competent public authorities, must maintain an attitude of maximum availability and collaboration without hindering in any way the functions of the inspection and control bodies.

Principles of health and safety protection

PRINCIPLE 18:

The health and safety of workers and the working environment is an essential principle of corporate life.

Therefore, the choice of consultants and individual company managers is made in compliance with high quality targets in terms of experience and professionalism.

ECO CIS is committed to spreading and consolidating the culture of safety among employees, collaborators and members, developing awareness of risks and promoting responsible behavior by all.

To this end, it undertakes to:

- adopt occupational health and safety management systems;
- avoid risks where possible;
- assess risks where they cannot be avoided;
- define specific mitigation actions, objectives and improvement programs, aimed at minimizing accidents and occupational diseases;
- account for occupational health and safety in the performance of its activities.

Inside ECO CIS, all levels, both top management and operative, must adhere to these principles.

Principles of environmental protection

PRINCIPLE 19:

The Company is committed to protecting the environment on a daily basis, with the aim of continuously improving its environmental performance.

By virtue of the above, it has obtained the UNI EN ISO 14001:2015 certification since 2018.

To this end, it undertakes to comply with the following points:

- Compliance with national and EU legislation and regulations in the environmental field;
- Pollution prevention;
- The maintenance of a certified environmental management system ISO14001 for the control and improvement of direct activities that have a potential impact on the environment;
- Raising the awareness of the entire corporate pyramid so that, in carrying out the activities carried out on behalf of the Company under their sole responsibility, compliance with national and EU legislation and regulations in the environmental field is guaranteed, and the most appropriate measures are taken to minimize potential negative impacts on the environment.

