

# CODE OF ETHICS

## FOREWORD

The principles underlying our work are inspired by the need for ethical behaviour defined by full transparency and clarity in the relations between people and organisations, companies and other partners. Full transparency and sharing to achieve the goals that are common to those who do business and those who collaborate with them. The achievement of economic goals must go hand in hand with an ethically correct behaviour, inside and outside the company.

The trust gained from customers and suppliers is our most important asset. All our actions are based on this trust and on our willingness to maintain it. At every stage of our work, we want to respect a code of ethics that represents the values of our company and those who work with us.

We ask those who deal with us to equally respect these values, which we consider essential in regulating relations between the various players in our business.

- In achieving the company's economic goals, we want to make a fair profit, without taking advantage of emergency situations and industry or international crises.

- DM does not supply raw materials to the war industry, either directly or indirectly. It encourages and promotes social peace initiatives.

- We are not willing to support dominant monopoly positions, nor are we willing to make deals for partial control of market niches.

- We are determined to seek the proper exploitation of natural resources that are in themselves finite. As in the tradition of farmers and fishermen we believe in the extraction for daily, monthly or yearly needs. We do not want to take part in the uncontrolled exploitation of the planet's resources with the sole objective of maximum profit in the shortest possible time.

- We want to promote all environmentally sustainable initiatives such as intermodal transport of goods and its balance.

- Our initiatives are aimed at reducing waste through the recycling of secondary raw materials.

- The extraction of virgin raw materials from finite reserves must tend towards a planning in balance with what nature offers globally.

- Among the companies represented, we favour those that have already achieved an environmental certification and follow a long-term resource exploitation programme, planned with the local authorities.

- Exploitation of natural resources must be limited as far as possible and accompanied by the study and experimentation of new ways of applying end-of-life products for their recycling and reuse.

## 1) GENERAL PRINCIPLES

In carrying out its activities, DM promotes the following GENERAL PRINCIPLES and requires its suppliers, partners and stakeholders in general to share, respect and adopt a conduct in line with the same principles, by applying them to the other areas of the value chain as well. Sharing, adherence to and compliance with the GENERAL PRINCIPLES of this Code of Ethics is key in the process of selecting and evaluating suppliers and possible partners, and compliance with the GENERAL PRINCIPLES is a prerequisite for working with DM, but does not determine any rights for the same. The GENERAL PRINCIPLES of the Code supplement the provisions of any contractual commitments between DM and its suppliers and/or possible partners, but do not replace them.

- a) **NON-DISCRIMINATION** - DM avoids any discrimination based on gender, age, disability, nationality, sexual orientation, ethnicity, religion, political opinions and any other form of diversity with regard to any type of relation: employees, collaborators, including temporary collaborators, partners, suppliers, customers, stakeholders in general.
- b) **HUMAN RIGHTS AND LABOUR RULES** - at DM, personnel are hired with regular employment contracts, in accordance with the legislation in force; no form of irregular work is tolerated and child labour and/or forced labour are banned. DM ensures compliance with applicable regulations, laws and standards on working hours and minimum wages in the relevant countries in which it operates.
- c) **QUALITY AND SAFETY OF SERVICES AND PRODUCTS** - DM ensures the compliance of its services and products with the applicable regulations and laws on product safety in the countries in which it operates. Furthermore, DM's activities are aimed at satisfying and protecting its customers by listening to requests that may improve the quality of its products and services, always oriented towards high quality standards in compliance with the applicable current regulations in the countries in which it operates.
- d) **ENVIRONMENTAL PROTECTION** - For DM the environment is a primary asset to safeguard in order to protect the rights of future generations. DM promotes and ensures compliance with the applicable laws and regulations in the countries in which it operates.
- e) **PROTECTING SAFETY AT WORK** - For DM, protecting safety and health at work is a primary objective that underlies every activity. DM is committed to compliance with the legislation, regulations and procedures applicable in every country in which it operates.
- f) **LEGAL COMPLIANCE** - DM pursues compliance with internationally recognised standards, contractual agreements, regulations and applicable laws. By way of example, but not limited to, DM guarantees to comply with legislation on: prohibition of bribery, conflict of interest, competition and antitrust, confidentiality and intellectual property, international trade compliance, licences and authorisations, taxation, data protection and privacy.
- g) **CONFIDENTIALITY AND PROTECTION OF PERSONAL DATA** - DM ensures the confidentiality of information in its possession and its management. In addition, people at DM are required not to use confidential information for purposes unrelated to the exercise of their business. DM complies with the indications provided for by the national and European regulations on protection of personal data to guarantee full respect for the privacy of all the individuals with whom it interacts.

## 2) CORE VALUES

To DM, all of the following are FUNDAMENTAL VALUES to be promoted and protected:

**VALUE OF INDIVIDUALS** - DM focuses on its people as an enabling factor to thrive in an ever-changing world. For this reason, DM protects and enhances the value of individuals who work in the company by promoting learning and professional development. In particular, DM ensures that its actions are not

detrimental to people's dignity and autonomy, and that its work organization choices safeguard the value of individuals as well as the work-life balance

**INTEGRITY OF THE INDIVIDUAL** - DM guarantees the physical and moral integrity of its people, as well as working conditions that respect personal dignity and individual characteristics and safe and healthy working environments. It also acts to ensure that no episodes of harassment, intimidation, mobbing or stalking occur in the workplace. DM does not tolerate requests or threats aimed at inducing people to act against the law, the Code of Ethics or to adopt behaviour detrimental to individual beliefs and preferences.

**HONESTY** - Within the scope of their professional activity, people at DM are required to diligently comply with the laws in force, the Code of Ethics, and internal regulations. Under no circumstances may the pursuit of DM's interest justify any dishonest conduct.

**RESPONSIBILITY TO THE COMMUNITY** - DM directs its activities, its investments, its energies in a sustainable manner, also in view of the added value they may have on individual conditions, on economic and social development, and on the general wellbeing of the community. Therefore, DM is dedicated to the local communities in which it operates, also promoting initiatives of cultural and social value. Furthermore, it is attentive and committed to promoting initiatives with the purpose of social solidarity towards disadvantaged persons, with particular reference to persons with disabilities and children.

DM believes that compliance with applicable tax regulations is a form of responsibility to the community.

### 3) STANDARDS OF CONDUCT TOWARDS PERSONNEL OF DM

Personnel to be hired are evaluated based on the correspondence of the candidates' profiles with those expected and with the company's needs, respecting equal opportunities for all forms of diversity. Personnel are hired with regular employment contracts, in accordance with the legislation in force; no form of irregular work is tolerated and child labour and forced labour are banned, in addition to what is stated in point b) of the GENERAL PRINCIPLES. DM ensures equal opportunities and non-discrimination in the management of people by giving value to each person's unique contribution.

To DM 'continuous training' is a tool to be promoted to expand the skills and knowledge required to meet professional needs and to follow and broaden the inclinations, needs and passions of each individual, as well as to help people develop their potential.

DM is aware that people's involvement is essential to reach the company goals; this involvement is fulfilled through active, collaborative participation based on independent judgement.

DM is committed to encouraging behaviours aimed at fostering personal and organisational wellbeing as factors promoting people's involvement and potential development.

**SAFETY AND HEALTH** – To DM, the health, safety and psychophysical integrity of people is the most precious asset to protect in every moment of life, at work as well as at home and during leisure time. DM is thus committed to developing, consolidating and spreading a solid safety culture throughout the company. The objective of DM is to guarantee a working environment free of health and safety hazards and to protect its people, constantly looking for the necessary synergies not only within the company, but also with suppliers, companies, partners and customers involved in its business.

DM is committed to complying with all applicable occupational health and safety legislation.

**INTEGRITY AND PROTECTION OF INDIVIDUALS** - DM promotes the principles of diversity, inclusion and equal opportunities and is committed to creating a working environment in which people are treated fairly, ensuring the right to working conditions which respect the dignity of the individual. DM is committed to protecting the physical and psychological integrity and individuality of each person and opposes any form of discriminating behaviour with regard to gender, age, disability, nationality, sexual orientation, ethnicity, religion, political opinions and any other form of individual diversity or any other behaviour detrimental to the individual, their beliefs or preferences.

**DUTIES OF PEOPLE** - People working with DM must act loyally in order to comply with the obligations subscribed to in the employment contract and the provisions of the Code of Ethics, guaranteeing the required performance. People working with DM must report through the appropriate channels any

situations that they consider to be violations.

Each person at DM is required to work diligently to protect the company's assets, through a responsible conduct in line with the internal procedures.

#### 4) STANDARDS OF CONDUCT IN CUSTOMER RELATIONS

DM's conduct to customers is based on helpfulness, inclusiveness, respect and courtesy, in order to ensure a collaborative and highly professional relationship. DM is committed to guaranteeing adequate standards of quality and safety of the services/products offered. DM is committed to responding to customer suggestions and complaints.

When selecting its customers, DM will make sure that they share, apply and direct their activities according to the GENERAL PRINCIPLES of this Code of Ethics.

#### 5) STANDARDS OF CONDUCT IN RELATIONS WITH SUPPLIERS AND PARTNERS

As stated in point 1) of this Code of Ethics, sharing, adherence to and compliance with the GENERAL PRINCIPLES of this Code of Ethics is key in the process of selecting and evaluating suppliers, and compliance with the GENERAL PRINCIPLES of this Code is a prerequisite for working with DM, but does not determine any rights. The GENERAL PRINCIPLES of the Code supplement the provisions of any contractual commitments between DM and its Suppliers, but do not replace them.

The GENERAL PRINCIPLES of the Code of Ethics set out the requirements for the Supplier with whom DM does business, including parent companies, subsidiaries or affiliates. It is the responsibility of the Supplier to disclose, educate and be diligent in verifying the compliance of its employees, agents and subcontractors with this Code, when relevant.

In its relations with the suppliers, DM strives to ensure that purchasing processes are characterised by prerequisites of mutual loyalty, transparency and cooperation. Suppliers' performance must guarantee not only the necessary quality standards, but also their commitment to adopt best practices in terms of human rights and working conditions, occupational health and safety, and environmental responsibility. Products and services must comply with applicable product safety regulations and laws in the relevant countries in which they operate. Suppliers must be able to provide the applicable documentation containing all safety information (e.g. product information, safety data sheets, etc.), as well as quality compliance in accordance with established standard levels and with applicable laws and regulations in the countries in which they operate.

In any case, if the supplier, in carrying out its activity for DM, adopts behaviour not in line with the general principles of this Code of Ethics, DM is entitled to take appropriate measures, even precluding any other opportunities for collaboration.

DM reserves the right to verify compliance with the GENERAL PRINCIPLES of the Code of Ethics as follows:

- **Self-Assessment:** DM may ask Suppliers to fill in a self-assessment form to evaluate their compliance.
- **Inspections:** The Supplier shall grant DM the right to conduct inspections (quality, safety, compliance, etc.). Such inspections may be conducted by DM directly or by authorised third parties acting on DM's behalf.
- **Third Party Assessments:** DM may request electronic information from third parties, e.g. a data provider, on compliance with the Supplier Code and performance related to these Principles.
- **Certifications/Declarations:** DM may require a certification or declaration from Suppliers that confirms compliance with the GENERAL PRINCIPLES.

Suppliers (and consequently, their supply chain, including parent companies, subsidiaries or affiliates) shall immediately report any behaviour that does not comply with this Code or with the applicable regulations or laws through the helpdesk (email: [daviddidavidmarco@legalmail.it](mailto:daviddidavidmarco@legalmail.it)).

## 6) METHODS OF IMPLEMENTATION

In order to pursue compliance with this Code of Ethics, DM ensures:

- maximum distribution and awareness of this Code of Ethics among the Addressees;
- checks on compliance with the Code of Ethics;
- the application of sanctions in the event of violation of this Code of Ethics, in compliance with the laws in force;
- the prevention and suppression of any form of retaliation against those who contribute to the implementation of this Code of Ethics;
- the periodical verification and updating of this Code of Ethics on the basis of requirements that may arise from time to time.

In relation to this Code of Ethics, in case of clarifications, doubts as to the lawfulness of a behaviour, its ethical disvalue or its contrariety to the principles, as well as the interpretation thereof, DM shall provide any appropriate or necessary clarification or information, through the email address [daviddidavidmarco@legalmail.it](mailto:daviddidavidmarco@legalmail.it).

Reports of any offences, irregularities or violations of this Code of Ethics shall be made to the email address [daviddidavidmarco@legalmail.it](mailto:daviddidavidmarco@legalmail.it); DM shall guarantee the anonymity and confidentiality of the communication and avoid any form of retaliation against the reporter ('Whistleblowing'), the operational implementation modalities of which shall be communicated separately.

The first version of this Code of Ethics was drawn up in Mirandola, on 01/05/2024