



Ethics and Conduct Code

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1 SCOPE

The scope of this document is to define the **Code of Ethics** and the **Code of Conduct** of Media Lario.

The scope of the **Code of Ethics** is about the principles guiding the relationships between Media Lario Srl (hereafter also called Company) and all stakeholders; it contains our mission and policy and our values, which drive our decision-making process. By sharing the content of this document with all partners and collaborators, we ask them to demonstrate compliance and support of our mission and values. Compliance to statutory and regulatory rules applicable to our business is the further basis for our Code of Ethics.

The scope of the **Code of Conduct** is about providing rules and behavioural guidelines for every-day activities performed in the Company involving our employees, stakeholders, and our suppliers. The Code of Conduct is guided by the principles described in the Code of Ethics.

2 REFERENCES

2.1 Applicable documents

[AD1] 9000-0001, "Quality Manual"

2.2 Reference documents

[RD1] ILO Conventions on Child Labour ([web page](#))

[RD2] ILO Forced Labour Convention

[RD3] Italian Law n. 296/2006

2.3 Definitions

Child labour – Child labour is defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that:

- is mentally, physically, socially or morally dangerous and harmful to children; and/or
- interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work. ([RD1], No.138 and No.182)

In Italy, the minimum labour age is 16 years old ([RD3]).

Forced Labour – Forced Labour is any kind of work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily. ([RD2] No. 29)

2.4 Acronyms and abbreviations

CCNL	Contratto Collettivo Nazionale dei Lavoratori
ILO	International Labour Organization
ML	Media Lario S.r.l.
CEO	Chief Executive Officer
CTO	Chief of Technical Officer

3 CODE OF ETHICS

3.1 Mission

To serve our customers with solutions to their requirements by exceeding their expectations, being attentive to their needs at all times and always doing the best work we possibly can.

We thrive in rising to this challenge while also maintaining professional ethics and concern for each other and for the environment at all times.

3.2 Quality Policy [AD1]

Our policy is to exceed the Customer expectations and to guarantee full satisfaction of the Company's Customers, Shareholders and Personnel through:

- Continuous improvement of our products, processes and services
- Human and professional growth of personnel
- Achievement of the defined targets
- Effective and clear communication
- Respecting both environment and workplace safety

Our Quality System is built with the participation of our Customers and Suppliers and it is focused on the improvement of the Company's processes on the respect of laws and regulations and on the education, training and quality awareness of our collaborators. We are convinced that:

- Every activity can be improved
- Each person can be supported and trained
- Each target should be clear and achievable
- Each assessment should be impartial and measurable

Everyone in the Company is responsible for the implementation of this Policy, each for her or his role, starting from the CEO who has this responsibility at the highest level.

3.3 Our core values

Media Lario defines the following core values, which are guides for daily activities and behaviour in our work environment.

3.3.1 Openness / Sharing of Information

In Media Lario we share internally our knowledge, in all possible ways, at all possible times. The Company performs better when critical information is shared within the team, promoting collaboration in all possible ways.

3.3.2 Teamwork

Media Lario recognizes that working as a team is more powerful than working individually. In this way, good ideas can come from anyone, but when the team works on a shared idea, it can become even better. People are personalities and their skills; the key factor is to find who can better perform each activity, giving its best contribute to the whole team.

3.3.3 Problem Solving

Media Lario recognizes that the key point in problem solving is to confront and be critical of issues but not of people. If something is not working, people are free to declare it clearly: the team can then work together to find solutions, document and implement them.

3.3.4 Learning

Media Lario believes in learning as fundamental element for improvement. We are open to always find the best solution, both internally the Company and externally. We believe that a good way to learn is teaching to others, that's why we directly involve staff people in training and teaching activities inside the company.

3.3.5 Human Rights and Inclusion

In Media Lario people are treated with dignity and respect. We treat others as we would wish to be treated ourselves. Media Lario is committed to create an inclusive work environment, despite differences, which are rather considered as resources and opportunities. We aim to create a work environment free from discrimination, harassment or retaliation and open to dialogue, including management. Everyone is encouraged to express their own ideas.

Media Lario works in accordance with the relevant guidelines of the International Labour Organization (ILO). As such, Child Labour and Forced Labour of any kind are not acceptable in any situation.

We acknowledge and respect the right of workers to freely associate.

3.3.6 Moral Integrity

Honesty, responsibility, ethics, incorruptibility are core values of Media Lario and are applied in our daily activities. We comply with all anti-corruption laws applicable in Italy and in all countries where we serve our customers.

3.3.7 Lawfulness

Media Lario promotes full respect of the law, in Italy and where the Company does business; under no conditions may the interests of Media Lario give legitimacy to actions that do not comply with the law or that pursue personal interests. Such behaviours are against our principles.

Media Lario is also committed to providing a safe and healthy work environment for all employees, in compliance with applicable laws and regulations.

Employees' compensations are equal or above the minimum compensation level imposed by law or set by the collective labour agreements of reference.

Sensitive information and personal data are treated as defined by applicable laws and regulations.

3.3.8 Attention to the Environment and Society

Media Lario encourages sustainable business practices and environmental responsibility, including compliance with relevant environmental laws and regulations.

Our manufacturing processes are optimized in order to recycle or reuse as much as possible chemical auxiliary materials and water used for the realization/finishing of our products.

Wastes are managed in full compliance with the applicable laws, with a strong sensibility of all employee toward the correct differentiation of disposed materials and elimination of plastic materials where possible, giving priorities to recyclable-reusable materials.

3.3.9 Transparency

Media Lario manages relationships among all involved parties on the basis of principles of transparency. Information provided are always truthful and as complete as known.

3.3.10 Fairness

Employees are treated equally and valued by recognizing their individual competences and merits. Media Lario promotes training and professional growth, believing that each employee can bring value to the development of the business and to a positive work environment in the Company.

As far as behaviour toward business competitors is concerned, Media Lario encourages ethical business practices and fair competition, including compliance to antitrust and law governing fair competition.

3.3.11 Gender equality

Media Lario assures fairness of treatment for women and men, according to their respective needs. This includes a treatment which is equivalent in terms of rights, benefits, obligations and opportunities. The Company promotes a balanced gender representation inside the organization.

4 CODE OF CONDUCT

4.1 Rules

4.1.1 People/employees

- All employees must avoid offensive behaviours or speech or images, including any form of ambiguous behaviours, sexual harassment, bullying or discrimination. This is not to be intended as a limit for anyone to express their opinions on any matter, it is just to make sure that everyone is treated with respect.
- All employees must respect laws and any applicable statutory and regulatory rules.
- All employees must respect the confidentiality of data and information which they may acquire during their work; each information shall be treated as “confidential” if not otherwise specified.
- Personnel cannot accept by customers or suppliers any gifts with value greater than 50 euros, or benefits of any kind of nature, which may lead to engage in conduct that is in conflict with the company’s ethical principles expressed in this document.
- Personnel must inform the company if they are engaged in external activities that may lead to a conflict of interest. In case of a potential conflict of interest, employees must disclose and explain it to their manager in order to find an agreed resolution of the conflict.
- All personnel must strictly respect all laws and obligations deriving from the regulatory of reference in the area of health, safety and the environment, and must respect all measures established internally.
- It is strictly forbidden to use Child Labour.
- It is strictly forbidden to use Forced Labour.
- The Company’s tangible and intangible assets must be used by employees and collaborators only for business purposes; any other use is strictly forbidden.
- Agreed working hours shall be respected and presence shall be recorded accordingly; absences shall be communicated to the managers and justified in the payroll system.

4.1.2 Customers

- Customers are invited not to offer any gifts, gratuities or benefits of any kind and nature to the Company’s employees which may lead Media Lario personnel to engage in a conduct that is in conflict with the principles outlined in this document or with local laws.

4.1.3 Suppliers

- Suppliers must respect laws and any statutory and regulatory rule applicable in pertinent country in which operations are managed or goods/services are provided, including ROHS/REACH regulation (for import in EU markets) and Conflict Minerals Regulation; formal declaration shall be released to Media Lario.
- Respect of laws and regulation shall be cascaded through all sub-tier suppliers to ensure full compliance of the entire supply chain.
- Import/export business practices shall be performed in accordance with all applicable laws, directives and regulations considering the countries involved in the business activities.
- It is forbidden for suppliers to use Child Labour.
- It is forbidden for suppliers to use Forced Labour.
- Minimum wages shall be guaranteed, as per local laws/regulations.
- Suppliers must assure a safe work environment and incident prevention for employees; additionally, suppliers must assure an inclusive and respectful work environment, in line with the Ethical principles of Media Lario.
- Suppliers must inform Media Lario if they are engaged in any activity that may lead to a conflict of interest.
- Suppliers must respect Media Lario intellectual property and protect the information from improper diffusion.
- Suppliers are engaged on the basis of fair competition and they are selected on the basis of objective evaluations, as far as possible, taking into account their competitiveness, timeliness, quality, technical and professional ability, costs, integrity and reliability.
- Suppliers are invited not to offer gifts with a value greater than 50 euros, or benefits of any kind of nature to Company employees, which may lead Media Lario personnel to engage in conduct that is in conflict with the company's ethical principles.
- Suppliers are encouraged to implement their own code of ethics and code of conduct tailored to their sizes and businesses, and disseminate to Media Lario and all involved parties.

4.1.4 Public Authorities

- Media Lario cooperates with national and international authorities and is committed to provide clear, comprehensive and timely information.
- Media Lario rejects any conduct that may be interpreted as a promise or offer of payments, goods or other benefits of various kind and nature in order to promote and favour its interests and/or draw undue benefit from them.
- The Company rejects any requests for favours, gifts, facilitations of any kind, also to the benefit of third parties, from public authority representatives.

5 CONTROL SYSTEM

5.1 Whistleblowing policy

This section defines the method for managing reports about activity that is illegal or dishonest, or can be a breach to laws and regulations, values and principles set out in the Code of Ethics or Code of Conduct.

In order to always comply with the law and with the standards of behaviour set out above, Media Lario has adopted the following way to manage whistleblowing.

Whoever has a current or has had a past relationship or association with Media Lario, on a permanent or a temporary basis, may signal about irregular activities utilizing web based application linked to Media Lario web site.

Signalling is periodically monitored by external competent people delegated for management, for answering, investigating and following all steps and timing defined by law.

The information to be provided are guided by the web application and shall contain:

- Description of event and circumstances, date, place
- Evidence (pictures, documents or similar), if any, proofing the event
- How the informant has obtained the knowledge of the event
- Name/position of involved people and any detail which may help the committee to identify the involved subjects
- Names of other potential witnesses

The identity of the informant will be protected by specific software encryption and by the delegate which has the responsibility to investigate on highlighted event. Signalling can also be performed in anonymous way.

5.2 Sanctions

If the event has been proved, sanctions can be applied:

- Whatever is applicable following statutory/regulatory/laws, depending on nature or severity of the event;
- Whatever is applicable following CCNL;
- Any other actions, in line with local regulatory framework, decided by the Company (for example: work suspension,)

6 DOCUMENT APPROVAL AND DISTRIBUTION

Due the value of the content of this document for our Company, our Code of Ethics and Code of Conduct has been prepared with the support of competent external experts and has been reviewed by Board of Directors.

Also further revisions will be approved in the same way.

This document will be published on the Media Lario web site and will be referred to within the hiring contract of new personnel as well as in contracts with suppliers.

Media Lario staff will be trained on the content of this document on a yearly basis in order to assure a continuous common understanding and also to be open to suggestions for its improvement.

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