



# Agresti

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FIRENZE 1949

**CODE OF CONDUCT**



*"Safety, elegance, refinement.*

*Ethics, legality, sustainability".*

*It is a great pleasure sharing with you the Code of Conduct of Agresti.*

*This Code shows the values that guide our conduct since the very beginning as well as the principles on which we base our daily activities and external relations.*

*In 1949 Florence, always art and beauty's setting, saw the birth of the Company and, since then, it becomes the cradle of all our precious creations.*

*The love of luxury and elegance are the result of a tradition that allows us to always work at our own creations with passion and success.*

*Safety, elegance, and refinement: these are the guidelines of Agresti, that has been manufacturing elegant strongboxes, fine furniture skillfully handcrafted, and much more, for over 70 years.*

*What makes us truly unique is not only the Made in Italy, experience and our work's tradition, but also the design, the functionality and the style of any creation.*

*Our success lays on our strong desire to combine a passion for quality with a business based on ethics, legality and sustainability.*

*We hope that this Code can represent a point of reference in relations with our stakeholders and reaffirm the attention that we pay, at all levels, to the ethical exercise and the proper conduct of business.*

*Andrea Damiani*

*Chairman of the Board of Directors*

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# GOALS, RECIPIENTS AND SCOPE

Agresti promotes the Code of Conduct internally and amongst its employees as well as its own internal and external stakeholders.

The Company operates in compliance with approved best practices, including the international ones.

The rules under the Code of Conduct shall apply, without any exception whatsoever, to the following recipients: corporate bodies, management, employees, external collaborators (including on an ongoing basis, such as consultants, etc.). The rules of the Code of Conduct shall also apply to relationships with commercial partners, suppliers and any parties liaising with the Company.

It is primarily up to corporate bodies and the management to make the values and principles under the Code of Conduct concrete.

The Company strictly complies with principles, goals and rules provided by the Code of Conduct. This commitment is required not only by the personnel, but also by external collaborators, suppliers and all those who have relations with the Company.

The Company does not tolerate the violation of these principles, fights against material and moral corruption that may undermine its integrity and provides itself with organizational tools fit to prevent the breach of the principles set out in the Code of Conduct, monitoring their compliance and concrete implementation.



# LEGALITY AND BUSINESS INTEGRITY

All the recipients are required to carry out, as part of their work activity, behaviours compliant with all the applicable national, EU and international laws in force.

Integrity is a fundamental value of the Company, an important element of the corporate asset, and the strongest warranty of its social commitment towards all the people who work for it, all its suppliers, all its customers, and all its stakeholders in general.

Compliance with this principle is ensured through the application of the law, according with the rules of moral integrity and the highest ethical values.



## **Fight against corruption and the conflict of interest prevention**

All forms of corruption, whether direct or indirect, active or passive, against any third party, whether it be a Public Administration or a private subject are forbidden.

Therefore, all forms of payment or concession of advantages to any third party are forbidden, other than those strictly deriving from a contractual obligation or from a business relationship governed by contract.

The recipients may accept or offer gifts in name or on behalf of the Company, provided that they comply with locally accepted good business practices and only if the gifts are lawful, of modest value, offered in a transparent and explicit manner, occasional or delivered on the usual occasions of exchange of gifts and such as not to potentially or effectively influence the integrity and independence of those who receive them.

The recipients must also avoid (and in any case are required to report) situations and/or activities that may lead to conflicts of interest or that could interfere with their ability to make impartial decisions, in order to safeguard the interests of the Company.



# LEGALITY AND BUSINESS INTEGRITY

## Professional competence, reliability and corporate reputation protection

The Company conducts its business in accordance with the highest standards of ethical and professional behaviour. All activities carried out on behalf of the Company must be performed with the utmost diligence, professionalism and reliability.

The recipients must carry out the activities falling within their competence with a commitment appropriate to the responsibilities entrusted thereto, in any case promoting a correct and appropriate behaviour in their relationships with customers, suppliers, and partners, as well as protecting the Company's reputation and image.



## Fight against money laundering

Maximum transparency in commercial transactions and in relations with third parties is required, in full compliance with national and international laws and regulations on fighting against money laundering.

All financial transactions are carried out through means of payment that guarantee traceability and within the limits of the regulations in force.

Partners, customers, suppliers or third parties with whom the recipients intend to start business relationships on behalf of the Company must have a good reputation and not be associated and/or associable to events connected with criminal activities of any kind.

The Company shall in no way purchase goods, which, due to the conditions of the relevant offer, give a reason for doubting the lawfulness of their origin and does not have economic relations with persons who give a well-founded reason to believe that they carry out illegal activities.

# LEGALITY AND BUSINESS INTEGRITY



## Transparency and accounting operations regularity

Accounting transparency and keeping of accounting records abiding by principles of truth, completeness, clarity, precision, accuracy and compliance with the legislation in force are the fundamental prerequisite for an efficient control.

In order for the accounting documents to meet the above requirements, adequate and complete supporting documentation is kept in Company's records for each single accounting transaction carried out.

The corporate assets are managed in a correct and honest manner; therefore, all recipients contribute to protecting their integrity so that the maximum safeguard thereof is achieved.

In managing all company activities, the recipients are required to provide, even externally, transparent, truthful, complete and accurate information, thus refraining from spreading false information or from carrying out simulated transactions.

## Ethical use of corporate equipment and IT systems

Corporate equipment must be used with diligence, responsibility and in order to guarantee the protection and integrity of any such equipment, thus avoiding any improper use that could cause damage or that is contrary to the interests of the Company or detrimental to its reputation.

It is also forbidden to use the Company equipment, the IT systems, the website or social networks for purposes contrary to law, public order or morality, as well as to commit or induce the perpetration of crimes, to incite racial hatred, xenophobia, exaltation of violence, discriminatory acts or the violation of human rights, or that may result in undue intrusion or damage to the IT systems of others.

# LEGALITY AND BUSINESS INTEGRITY

## Protection of industrial and intellectual property and of Made in Italy

In order to implement the legality principle, it is ensured compliance with the internal, EU and international rules for the protection of industrial and intellectual property.

Recipients are required to protect intellectual property of the Company, customers and third parties in general and to promote the proper use of all intellectual works.

To this end, it is forbidden to carry out any conduct aimed, in general, at the duplication, falsification or reproduction of others' work in any form and without right and it is also forbidden to use unauthorized software and databases on computers, according with Company procedures.

The Company protects the Made in Italy and its artisan culture, of which Agresti products are an expression.

## Fair competition

The Company protects the value of fair competition, thus refraining from predatory behaviour and abuse of a dominant position, in compliance with the antitrust legislation in force, and the decisions of the relevant market regulatory Authorities.

## Confidentiality of the information and personal data protection

It is protected the confidentiality of information forming a corporate assets or, in any case, of personal information and data, which are managed in the strictest compliance with the legislation in force, also on personal data protection.

In particular, the processing of personal data must be carried out in a lawful and correct manner. Personal information is collected and stored only when it is necessary for certain explicit and legitimate purposes. Data shall only be retained for a period of time not exceeding that necessary for the aforesaid purposes.



## Taxation and customs

Compliance with all applicable tax and customs rules is ensured and fairly collaboration with all tax and customs Authorities is guaranteed, based on maximum transparency.

Company is committed to complying with tax obligations within the terms and in the manner provided by legislation or by the competent tax Authority. All acts, facts and transactions are carried out ensuring that forms of taxation correct and consistent with actual economic nature of the operations are applied.

Information in customs obligations are provided in a complete and truthful manner and all the due border duties are timely paid.



# HUMAN RIGHTS AND DEVELOPMENT OF THE HUMAN RESOURCES

## Dignity of work

Human resources represent for the Company a necessary and precious value for development and growth.

Company is committed to ensuring that all recipients are treated with dignity and respect and creating a serene working environment in which no form of isolation, exploitation or harassment is tolerated, nor discrimination based on race, language, color, faith and religion, political opinion and affiliation, nationality, ethnicity, age, sex and sexual orientation, marital status, disability and physical appearance, economic and social condition.

Company shall in no way enter into any employment agreement, nor any form of collaboration with persons without a regular residence permit, nor use companies that use irregular labour or labour in breach of working standards generally applied or provided for by international laws and regulations.

Staff shall be hired under a regular work contract; no form of irregular work shall be tolerated.

Company undertakes not to breach regulations on working time, rest periods, weekly rest, compulsory leave, holidays and not to subject the worker to degrading working conditions or surveillance methods.

## Health and safety

Company promotes the health and safety at work of its employees and all those who access its offices and work environments.

Working conditions that respect individual dignity and safe and healthy working environments are ensured by:

- taking effective measures to prevent potential accidents and damages to workers health that may occur during the course of work, taking into account the state of knowledge of the sector and of the specific risks;
- minimising the causes of danger attributable to the working environment.



All the recipients are required to contribute personally, within the frame of their activities, to keep the work environment in which they work safe, and to behave responsibly to protect their health and safety and that of others.

# ENVIRONMENTAL PROTECTION AND SUSTAINABILITY



In managing business activities, sustainable development and environmental protection goals are taken into the utmost account, in full compliance with the legislation in force.

The Company assures that all the materials used in the production – from metals to leather, from crystal to suede, from stones to brass – are environmentally friendly handcrafted.

The Company assures:

- continuous commitment to reducing the impact on the environment;
- pursuit of adequate levels of environmental protection;
- promotion of actions aimed at the differentiation in the collection, recycling and proper disposal of waste, paying particular attention to the choice of suppliers of waste management services.



# CUSTOMER INTERESTS

## Our products quality

The company aims to meet the expectations of its customers by supplying high quality products, in compliance with competition and market regulations and by basing its conduct on the values of fairness, honesty and professionalism.

The choice of suppliers and the determination of the relevant purchase terms and conditions fall within the scope of authority of the competent company functions, which act on the basis of objective parameters of quality, convenience, price, capacity and efficiency.



## Customer information

The Company provides customers with comprehensive and accurate information on products and on the possibility of customizing them, also with reference to the quality profile and origin of the materials used, thus allowing informed choices in line with customer needs.



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