

# Code of Ethics of Donati S.p.A.

ED. 02 | 01/07/2025

**DONATI**

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## 1 – INTRODUCTION

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### 1.1 Donati S.p.A.

Donati S.p.A. is a joint-stock company established in 1998, engaged in the production, molding, and processing of metal (die-cast and stamped) and plastic components for furniture in general, and in particular for chairs and office furniture. This includes the sale of related molds, as well as the production of specific parts or complex products for furniture, also on behalf of third parties.

The Company is subject to the management and coordination of Donati Holding S.r.l., which in turn owns 100% of the shares of Metalpres, Donati S.p.A. and Platek S.r.l.

The company carries out all activities covered by its corporate purpose in full compliance with national regulations, including those concerning environmental and health safety, with a focus on continuous organizational improvement.

To best implement this approach, Donati S.p.A. has established and maintains a certified Quality, Environment, Health, and Safety Management System, documented and compliant with the requirements of international standards ISO 9001, 14001, and 45001.

The company is particularly attentive to the protection of social capital and the common good. Therefore, on December 14, 2023, it adopted an Organizational, Management, and Control Model in accordance with Legislative Decree 231/2001, aimed at preventing and reducing the risks related to the commission of the offenses covered by the decree. It also appointed a Supervisory Body responsible for overseeing the effectiveness and actual implementation of the Model and this Code of Ethics.

### 1.2 Contents and Purpose of the Code of Ethics

This Code of Ethics has been adopted by the company based on the belief that business activities cannot be separated from ethical conduct and compliance with the law.

It contains the principles and behavioral rules that Donati S.p.A. recognizes as its own and to which it aligns its activities and all its relationships, both internal and external to the organization.

In other words, through this document, the company defines the responsibilities, rights, and duties that govern its actions toward all stakeholders—internal and external—within its social, legal, and economic context.

### 1.3 Recipients of the Company's Code of Ethics

The ethical and moral values, directives, and principles of conduct contained in this Code of Ethics are the milestones of the company culture. They must be observed by Shareholders, the Management Body, Attorneys, Executives, Employees, as well as Collaborators, Consultants, Suppliers, Clients, and, in general, all those who work with the Company under a contractual relationship, even if temporary, in the performance of their assigned tasks and functions.

## 2 — ADOPTION OF THE CODE OF ETHICS

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### 2.1 Adoption and Diffusion of the Company's Code of Ethics

This Code of Ethics is an integral part of the Organizational Model adopted by the Company's Management Body on December 14, 2023. The Code is distributed to all employees and collaborators of the Company and is freely accessible in electronic format on the Company's website: <https://www.donati.eu/en/>

New hires are provided with information about this Code along with the Organizational Model, through a notice referring to the Company's website, to ensure they are aware of the key behaviors required to prevent offense.

The Company carefully monitors compliance with the Code by implementing appropriate tools

### 2.2 Amendments to the Company's Code of Ethics

The Code is subject to revision by the Company's Management Body.

The revision process takes into account contributions from Employees and Third Parties, as well as regulatory developments, best international practices, and the experience gained in applying the Code itself.

Any amendments resulting from this revision process are published and made available using the same diffusion methods mentioned above.

### 2.3 Violation of the Code of Ethics

Compliance with the provisions of the Code of Ethics is an integral part of the contractual obligations of Employees under Articles 2104 and 2105 of the Italian Civil Code.

Violation of these behavioral rules constitutes a disciplinary offense sanctioned under the Organizational Model, in accordance with the rules and procedures established by the applicable National Collective Labor Agreement (CCNL).

The Company requires to Collaborators, Consultants, and Suppliers, compliance with the fundamental principles on which this Code is based, through specific contractual clauses.

Non-compliance with the Code of Ethics constitutes a contractual breach and may result in the termination of the contract and/or assignment, as well as compensation for any damages caused to the Company.

Under no circumstances does the claim of acting in the Company's interest justify behavior that conflicts with the principles set out in this Code of Ethics.

### 2.4 The Company's Supervisory Body

Responsibility for monitoring the implementation and compliance with this Code is entrusted to the Supervisory Body (also referred to as "OdV"), which is endowed with autonomous powers of initiative and control and is appointed by the Company's Management Body pursuant to Legislative Decree 231/2001 and subsequent amendments.

Without prejudice to the protections provided by current laws or collective agreements and subject to legal obligations, the Supervisory Body is authorized to receive requests for clarification as well as reports of potential or actual violations of this Code.

The Supervisory Body is bound to the utmost confidentiality and operates with impartiality, continuity of action, professionalism, and autonomy.

### 2.5 Reporting Violations of the Code of Ethics

Anyone who becomes aware of behavior that does not comply with the principles of the Code of Ethics, carried out by any of the Code's Recipients, must report it without delay.

Reports must be addressed to the Supervisory Body, which is also responsible for managing the internal reporting channel pursuant to Legislative Decree 24/2023. Reports may be classified as either *ordinary* or *whistleblowing*.

**Ordinary Reports Related to Violations of the Code of Ethics:** all Recipients are required to promptly report to the Supervisory Body any deviation, violation, or suspected violation of the behavioral rules outlined in the Company's Code of Ethics.

Reports must be detailed and based on precise and consistent factual elements and may be submitted:

- by regular mail, in a sealed confidential envelope, to the following address:

**"SUPERVISORY BODY OF DONATI S.P.A."**

**VIA PADERNO N. 15/F - 25050 RODENGO SAIANO (BS)**

- by email to the following address: (Regarding the confidentiality of this method, it is noted that, according to the Constitutional Court, ruling no. 170 of July 23, 2023: *«the confidentiality of communication, which in traditional correspondence is ensured by placing the paper document or note in a sealed envelope, is here guaranteed by the fact that the email is sent to a specific mailbox, accessible only to the recipient through procedures requiring the use of personal codes.»*):

**SERVIZIO.ODV.DONATISPA@STUDIUM1912.IT**

- by written communication, addressed to the Supervisory Body and delivered to the mailbox located near the information boards and labeled:

**"SUPERVISORY BODY OF DONATI S.P.A."**

The Supervisory Body evaluates all received reports and takes appropriate actions at its reasonable discretion and responsibility, within the scope of its authority. It may also hear from the reporting party and the person responsible for the alleged violation.

All decisions will be justified, and any resulting disciplinary measures will be applied by those with disciplinary authority, in accordance with the chapter on the Disciplinary and Sanctions System.

The Supervisory Body acts to protect whistleblowers from any form of retaliation, discrimination, penalization, or any consequence resulting from the report, ensuring the confidentiality of their identity, without prejudice to legal obligations and the protection of the rights of the Company or individuals wrongly or maliciously accused.

**Whistleblowing Reports:** all Recipients are required to promptly report to the Supervisory Body any behavior, act, or omission that harms the public interest or the integrity of the Company (of which they become aware in the work context), which may also include violations of the Code of Ethics.

These reports must be submitted through the dedicated internal reporting channels provided in the Organizational and Management Model pursuant to Legislative Decree 231/2001.

Reports must include the identity of the whistleblower (who may request to keep their identity confidential and benefit from protections in case of retaliation) and may be submitted in the following ways:

- in writing, via the dedicated digital platform accessible to all whistleblowers (employees and non-employees) from the Donati S.p.A. website.

The platform ensures confidentiality and full traceability through data encryption.

- orally, by requesting a personal meeting with the Supervisory Body (OdV), through an email request sent to (Regarding the confidentiality of this method, it is noted that, according to the Constitutional Court, ruling no. 170 of July 23, 2023: *«the confidentiality of communication, which in traditional correspondence is ensured by placing the paper document or note in a sealed envelope, is here guaranteed by the fact that the email is sent to a specific mailbox, accessible only to the recipient through procedures requiring the use of personal codes.»*):

**SERVIZIO.ODV.DONATISPA@STUDIUM1912.IT**

The meeting must be scheduled within a reasonable time from the receipt of the request.

In this case, the report, with the whistleblower's consent, will be documented by the Supervisory Body either through audio recording or by written minutes. In the case of minutes, the whistleblower may review, amend, and confirm the content by signing it.

The Supervisory Body will issue an acknowledgment of receipt within seven days of receiving the report. It will then carry out all necessary investigations and verifications, including requests for additional information, discussions with the whistleblower, and hearings with the person involved.

A response will be provided to the whistleblower within three months from the acknowledgment of receipt.

The Supervisory Body will take appropriate actions at its reasonable discretion and responsibility. All decisions will be justified, and any resulting disciplinary measures will be applied by those with disciplinary authority, in accordance with the chapter on the Disciplinary and Sanctions System.

The Supervisory Body ensures that the identity of the whistleblower and any information that could reveal it remains confidential. Disclosure of identity is only permitted with the whistleblower's explicit consent.

It also protects the identity of the individuals involved or mentioned in the report until the conclusion of the related proceedings.

The Supervisory Body ensures protection against any form of retaliation, discrimination, penalization, or adverse consequence for the whistleblower, any person assisting them, individuals in the same work environment with close personal or family ties (up to the fourth degree), or entities owned by or employing the whistleblower, unless the whistleblower is found criminally liable for defamation or slander, or civilly liable for willful misconduct or gross negligence.

Reports and related documentation are retained for the time necessary to process them and, in any case, no longer than five years from the date of the final outcome of the reporting procedure.

The Supervisory Body may retain them for a longer period, provided that personal data of the whistleblower, the individuals involved (as potential perpetrators), and others mentioned in the report are anonymized, in order to demonstrate proper handling of reports and effective implementation of the Model pursuant to Article 6 of Legislative Decree 231/2001 (as a defense against the Company's administrative liability).

Reports concerning actions or omissions by one or more members of the Supervisory Body must be immediately forwarded to the Board of Directors, along with any supporting documentation.

The Board of Directors will handle the report, gathering all necessary information to assess its validity, possibly with the support of internal departments or specialized consultants, in accordance with the same rules applied to reports managed by the Supervisory Body.

The Board's decisions will be formalized in a written resolution, which may include the imposition of sanctions as outlined in Chapter 5.8 of the General Section of the Organizational and Management Model.

### 3 – FUNDAMENTAL VALUES OF THE CODE OF ETHICS AND RULES OF CONDUCT

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#### 3.1 Compliance with Rules

Donati S.p.A. complies with EU, national, and regional laws, as well as current regulations, and condemns any behavior that is directly or indirectly in conflict with them, with internal regulations, or with the following principles.

Recipients are required to observe and respect the laws of the legal system in which they operate and must refrain from committing violations.

#### 3.2 Dignity, Equality, and Integrity

The company operates with the utmost respect for the physical and moral integrity and dignity of individuals. Recipients of this Code must recognize and respect the personal dignity, privacy, and personality rights of every individual. Relationships among employees and collaborators, at all levels of responsibility within the company, must be based on mutual respect and courtesy.

Donati S.p.A. does not tolerate any form of physical or psychological violence.

Furthermore, in performing their duties, recipients of this Code must act with transparency, honesty, fairness, good faith, and moral integrity, taking into account the various social, economic, political, and cultural contexts. The company disapproves of any form of discrimination, whether based on race, gender, religion, or any other factor.

#### 3.3 Effectiveness, Efficiency, and Cost-effectiveness

Donati S.p.A. conducts its activities according to criteria of effectiveness, efficiency, and cost-effectiveness, through the optimal use of available resources and the elimination of waste.

#### 3.4 Motivation

Donati S.p.A. encourages staff participation in the sharing of corporate goals, carefully evaluating opinions and suggestions and offering tools for training and professional growth.

#### 3.5 Professional Competence

Donati S.p.A. operates with professional competence and diligence, assigning responsibilities based on actual knowledge and technical expertise, and providing appropriate training and updating tools.

### 3.6 Professional Diligence and Team Spirit

The conduct of each Recipient significantly affects the quality, efficiency, and reputation of the Company.

Each Recipient performs their duties with the professionalism required by the nature of the tasks and functions carried out, applying maximum effort and diligently engaging in necessary study and updating activities.

### 3.7 Traceability

Each Recipient must maintain adequate documentation of every operation carried out, in order to allow verification of the reasons behind each decision and the characteristics of the operation itself, both during the authorization phase and during execution, recording, and auditing.

### 3.8 Transparency, Clarity, and Truthfulness of Information

Donati S.p.A. operates with maximum transparency and good faith towards all its stakeholders, in full compliance with Italian and European laws and regulations, establishing clear, complete, understandable, and truthful information flows.

### 3.9 Competition

Donati S.p.A. operates in the market under conditions of free and fair competition and condemns collusive, predatory, or abusive behavior involving a dominant position.

### 3.10 Conflicts of Interest

Recipients must avoid conflicts of interest in the performance of their duties.

Situations considered to be conflicts of interest include, but are not limited to:

- A direct or indirect interest in competitors' activities;
- Exploiting one's functional position to pursue interests that conflict with those of the Company or for personal gain;
- Using information acquired during work activities for personal benefit or for the benefit of third parties, in conflict with the Company's interests;
- Holding corporate positions or performing any kind of work for suppliers, competitors, or third parties in conflict with the Company's interests.

Any situation that could potentially generate a conflict of interest or otherwise impair the Recipient's ability to make decisions in the best interest of the Company must be immediately reported to the Supervisory Body. The Recipient is also required to refrain from taking any action related to or connected with such a situation.

### 3.11 Health and Safety

Donati S.p.A. is committed to the well-being of its employees and therefore ensures working conditions that respect human dignity, in safe and healthy environments, and actively promotes a culture of safety.

### 3.12 Environmental Responsibility

Donati S.p.A. is sensitive to environmental issues and operates with the utmost respect for the surrounding environment, adopting procedures aimed at minimizing any negative impact on flora, fauna, and the well-being of local communities, even beyond the limits imposed by law.

### 3.13 Confidentiality of Sensitive Data

Donati S.p.A. manages the collection of data necessary for the performance of its activities.

The use of confidential data for purposes other than those for which they were provided is strictly prohibited, unless expressly authorized and always in strict compliance with applicable legislation.

The protection of information and data stored on digital media must be ensured through the adoption of appropriate security measures.

The data and information collected are processed using automated tools for the time strictly necessary to achieve the purposes for which they were gathered.

Donati S.p.A. rejects any behavior that deviates from the principles outlined above.

## 4 – GENERAL ACTIVITIES AND CONDUCT GUIDELINES

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### 4.1 Personnel Selection and Management (Employees and Collaborators)

All company personnel are hired under a regular employment contract, and the employment relationship is conducted in full compliance with the applicable collective labor agreement, tax, social security, and insurance regulations, as well as immigration laws.

No form of irregular or child labor is tolerated. Any form of unlawful intermediation or labor exploitation, including modern slavery and forced labor, is strictly prohibited.

Loyalty, competence, professionalism, seriousness, preparation, and dedication of personnel are essential values and conditions for achieving the Company's objectives.

Recipients must also consistently respect the individual, their dignity, and their values, avoiding any discrimination based on gender, racial or ethnic origin, nationality, age, political opinions, religious beliefs, health status, sexual orientation, or socio-economic conditions.

As part of the selection process — conducted in accordance with the principles set out in this Code of Ethics, with equal opportunities and without any form of discrimination — Donati S.p.A. ensures that the resources acquired match the profiles actually required by the company's needs, avoiding favoritism and any form of preferential treatment.

Any act of retaliation against Recipients who refuse to engage in unlawful conduct or who report or complain about such behavior is strictly prohibited.

In the context of human resource development, Donati S.p.A. is committed to creating and maintaining the necessary conditions for each Employee's skills, competencies, and knowledges to grow, in order to ensure the effective achievement of the Company's objectives. For this reason, the Company pursues a merit-based policy, in full respect of equal opportunities.

In this context, Employees are expected to cultivate and encourage the acquisition of new skills, abilities, and knowledge, and to carry out their duties in full compliance with the organizational structure. This is also to ensure the proper and orderly activation of the internal control chain and the formation of a clear and structured framework of responsibilities.

Employees may not engage in work activities — even occasional or unpaid — that hinder or reduce the fulfillment of their official duties, conflict with them, or damage the Company's reputation.

Employees have the right to freely participate in associations, trade unions, or other groups that represent them.

### 4.2 Gifts, Donations, Benefits or Other Advantages

Recipients are prohibited from offering, providing, promising, or granting to third parties, as well as accepting or receiving from third parties, directly or indirectly, even during holidays, gifts, benefits, or other advantages, also in the form of money, goods, or services.

Only modest-value gifts that are directly attributable to normal courtesy relations are permitted.

Such gifts must not create — in the other party or in an impartial third party — the impression that they are intended to obtain or grant undue advantages, or otherwise give the impression of illegality or immorality. In any case, such gifts must always be properly documented.

Recipients are strictly prohibited from soliciting the offer or granting, or the acceptance or receipt, of gifts of any kind, even if of modest value.

Any Recipient who, in the course of their duties, enters into contracts with third parties must ensure that such contracts do not include or imply gifts in violation of this Code.

### 4.3 External Communication of Information

Information disclosed externally must be truthful, clear, and transparent. Relations with the press and media in general are exclusively reserved for the Company's Management Body.

Recipients who are required to provide external information regarding objectives, activities, or results through participation in public events, seminars, or the drafting of articles and publications must obtain authorization from the head of their organizational unit regarding the texts, prepared reports, and communication lines, coordinating and verifying the content with the competent function.

It is therefore expressly forbidden for anyone else to disclose confidential information regarding projects, negotiations, initiatives, agreements, or commitments — even if future and uncertain — concerning the Company that are not public knowledge.

Recipients must also refrain from spreading false or misleading information that could deceive the external community.



#### 4.4 Accounting Data: Compliance with Principles and Traceability

Accounting records must be kept in accordance with the principles of transparency, truthfulness, completeness, clarity, precision, accuracy, and compliance with current regulations.

Donati S.p.A. requires compliance with all applicable regulations, particularly those related to the preparation of financial statements and all mandatory administrative-accounting documentation.

Accounting is based on generally accepted accounting principles and systematically records events arising from the Company's operations.

Adequate documentation must be retained for each transaction to allow for easy accounting entry, reconstruction of the transaction, and identification of any responsibilities.

This documentation must make it possible to identify the reason for the transaction and the related authorization. Supporting documentation must be easily retrievable and archived according to appropriate criteria to allow easy consultation by both internal and external control bodies.

Recipients are required to cooperate in the correct and timely accounting of all management activities and to ensure that management events are accurately and promptly represented so that the administrative-accounting system can fulfill its purposes.

#### 4.5 Prevention of Crimes of Receiving Stolen Goods, Money Laundering, Use of Illicitly Originated Assets, and Self-Laundering

Donati S.p.A. conducts its business in full compliance with current anti-money laundering regulations and the provisions issued by the competent Authorities, committing itself not to engage in operations that may be considered suspicious in terms of fairness and transparency.

#### 4.6 Prevention of Organized Crime Offenses

Donati S.p.A. refrains from maintaining any kind of relationship, even indirectly or through intermediaries, with individuals or entities (natural or legal persons) known or reasonably suspected to be part of or to support in any form criminal organizations of any kind. This includes mafia-type organizations, those involved in human trafficking, child labor exploitation, or modern slavery, as well as individuals or groups operating with terrorist purposes. Such conduct includes actions that may cause serious harm to a country or an international organization, carried out with the intent to intimidate the population, compel public authorities or international organizations to act or refrain from acting, or to destabilize or destroy the fundamental political, constitutional, economic, and social structures of a country or international organization.

The Company also undertakes, to the extent permitted by applicable legal and regulatory provisions, to comply with restrictive programs and measures related to economic, financial, and commercial sanctions based on foreign policy and national security objectives adopted by the European Union and/or individual Member States, the United States of America, the United Nations Security Council, and other organizations as identified from time to time.

#### 4.7 Health and Safety in the Workplace

Donati S.p.A. pays particular attention to the prevention of accidents and the protection of workers' health and safety in the workplace.

Specifically, it conducts its activities under technical, organizational, and economic conditions that ensure adequate prevention and a healthy and safe working environment. It guarantees compliance with current health and safety regulations (Legislative Decree 81/2008 and subsequent amendments), through the monitoring, management, and prevention of risks related to work activities. The fundamental principles and criteria of prevention, which guide all decisions at every level regarding health and safety at work, are as follows:

- comply with current legislation on health and safety in the workplace;
- prevent accidents, occupational diseases, incidents, and generally dangerous behavior;
- monitor and, where necessary, improve health and safety conditions over time;
- eliminate risks at their source;
- avoid risks;
- assess risks that cannot be avoided;
- minimize risks in relation to the knowledge acquired through technical progress;
- consider the level of technological development in adapting machines, equipment, and all other devices in use;
- respect ergonomic principles in work organization and adapt work to people, especially regarding workplace design and equipment selection;
- define work and production methods to reduce monotonous and repetitive tasks and their effects on health;
- replace what is dangerous with what is not dangerous or less dangerous;
- provide workers with personal protective equipment appropriate to the risks, working conditions, and individual needs;
- plan prevention by integrating technology, work organization, working conditions, social relationships, and environmental factors;
- prioritize collective protection measures over individual ones;
- provide adequate instructions to workers;

- ensure medical surveillance of workers;
- participate in consultations and periodic meetings on health and safety;
- provide adequate and sufficient information, training, and instruction to workers and managers;
- plan appropriate measures to ensure continuous improvement in safety levels, including through the adoption of best practices;
- establish emergency measures for first aid, fire-fighting, evacuation, and immediate danger;
- use warning and safety signs;
- ensure maintenance of environments, equipment, and systems, especially safety devices, in accordance with manufacturers' instructions;
- ensure the signing of service contracts and the related Single Document for the Assessment of Interference Risks (DUVRI) in all cases required by law, and verify the technical-professional qualifications of contractors before signing the contract.

All activities, both at the decision-making level and at the operational level, must be guided by these principles.

Furthermore, workers are required to:

- correctly use machinery and equipment, personal protective equipment, and safety devices;
- report any work situation that poses a serious and immediate danger, as well as any defects in protection systems;
- comply with health protection requirements to enable the employer to ensure a safe and risk-free work environment;
- contribute, together with the employer, managers, and supervisors, to fulfilling obligations for the protection of health and safety in the workplace.

To this end, the company has implemented a Health and Safety Management System in accordance with the international standard UNI EN ISO 45001.

#### **4.8 Environmental Protection**

The Company monitors all applicable legal requirements in the environmental field, striving to ensure full compliance, including through the involvement and awareness of personnel directly engaged in managing environmental impacts, as well as third parties who, although not part of the company structure, are contractually linked to the Company for the management of environmentally impactful activities.

In particular, Donati S.p.A.:

- adopts measures aimed at limiting and – where possible – eliminating the negative impact of its economic activities on the environment;
- prioritizes the adoption of measures to prevent potential environmental damage;
- promotes the values and principles of this Code among all Recipients;
- operates within and in compliance with the authorizations it holds.

The drafting of any type of legally required environmental documentation (both paper and digital), as well as the accounting records of transactions with third parties that are directly or indirectly related to environmental management, is based on clarity, truthfulness, and accuracy.

The company has implemented an environmental management system in accordance with the international standard ISO 14001, certified by an accredited third-party body. This system includes all procedures necessary to ensure the provision of waste transport services in compliance with current environmental protection legislation.

To ensure continuous compliance with environmental regulations at every stage of service delivery, and to prevent the risk of committing environmental crimes, the Company has formalized procedures for managing both the commercial process and the waste transport phase, providing specific instructions to all employees to ensure proper execution of activities.

## 5 — REGULATION OF RELATIONSHIPS

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### 5.1 Relationships with Clients

Donati S.p.A. has always considered the quality of its processes and services as one of its primary objectives.

In particular, the company has implemented a quality management system in accordance with the international standard ISO 9001, certified by an independent third-party body, to ensure quality control at every stage of business processes, also with a view to continuous improvement.

### 5.2 Relationships with Suppliers of Goods and Services

The selection of suppliers of goods or services, as well as the purchase of any type of goods and services, is carried out based on objective and documentable criteria, aimed at achieving the best balance between economic advantage and quality of service.

In its relationships with suppliers, the Company adheres to principles of transparency, equality, fairness, and free competition.

Specifically, in these relationships, Recipients are required to:

- establish efficient, transparent, and collaborative relationships, maintaining open and honest dialogue in line with best commercial practices;
- obtain the cooperation of suppliers in consistently ensuring the best balance between quality, cost, and delivery times;
- demand compliance with the contractually agreed conditions;
- require suppliers to adhere to the principles of this Code of Ethics through the provision of specific information;
- operate within the framework of applicable laws and ensure their strict compliance.

### 5.3 Relationships with Public Administration and Regulatory Authorities

Relationships with Public Administration and with Authorities that perform supervisory functions are guided by principles of fairness, truthfulness, transparency, efficiency, and cooperation.

These relationships must be conducted in accordance with the rules of this Code, with particular attention to the principles mentioned above.

Specifically, the following behaviors are strictly prohibited:

- promising, offering, paying, or providing in any way money, goods, or other benefits (except for gifts or items of modest value that conform to normal business practices), even under unlawful pressure, to public officials or private counterparts for the purpose of promoting or favoring the Company's interests. These prohibitions cannot be eluded through other forms of support or contributions, such as appointments, consulting, advertising, sponsorships, employment opportunities, commercial opportunities, or any other kind of benefit;
- engaging in such behaviors or actions towards spouses, relatives, or in-laws of the individuals mentioned above;
- acting in ways intended to improperly influence the decisions of officials who handle or make decisions on behalf of Public Administration;
- providing or promising to provide, soliciting, or obtaining confidential information and/or documents that could compromise the integrity or reputation of either party, in violation of transparency and professional integrity principles;
- having Donati S.p.A. represented by a Consultant or third party when this could create conflicts of interest.

These behaviors are prohibited both during and after the relationship with Public Administration or private counterparts.

### 5.4 Relationships with Political Parties and Trade Unions

Relationships with political parties, trade unions, and other interest-based associations must be conducted in accordance with the rules of this Code, with particular attention to the principles of impartiality and independence.

The behaviors and actions described in sections 4.2 and 5.3 are prohibited in these relationships.

Institutional collaborations aimed at supporting the organization of events or activities—such as conferences, seminars, studies, research, etc.—are permitted, provided they are not intended to obtain undue favors.

# DONATI

## **Donati S.p.A.**

Via Paderno, 15/F  
25050 Rodengo Saiano (BS)  
Italy

phone +39.030.6818711  
fax +39.030.6810448  
info@donati.eu

[www.donati.eu](http://www.donati.eu)

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