

RONCHI



PACKAGING MACHINERY

IT CODE  
OF ETHICS

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## 1. Introduction

The progressive diffusion of new information technologies could expose the companies of the Ronchi S.p.A group to risks of both financial and criminal involvement, creating at the same time problems of image and security, when the infomatic tools provided by the company are used in a wrong way or for criminal purposes.

The increased importance of confidential information as part of the company's assets and the legitimate competitive advantage that the company derives from it, requires the company to equip itself with appropriate protection tools aimed at preventing the disclosure of confidential data, which could result in a civil and criminal liability for the violation of corporate secrecy.

Because of this, and in line with the european principles, the italian legislator modified Article 99 of the Industrial Property Code, requiring companies wishing to protect their secret information, to adopt measures (e.g. security measures) to protect the secrecy of information.

In particular, with reference to the security measures imposed by the Legislative Decree n. 196, 30 June 2003, for the processing of personal data, Ronchi Mario S.p.A. has taken steps to give appropriate instructions and indications to all those "company users" who, operating with informatic tools, are affected by the above measures. The legislative Decree 30 June 2003, n.196 has been subsequently modified by L. 27th December 2019, n.160, by D.L. 14 June 2019 and by Legislative Decree 10th August 101, n, 2018 regarding " Provisions for the adaptation of national legislation to the provisions of the Ue Reg. 2016/679 on the protection of individuals with regard to the processing of personal data, and the free circulation of such data".

Moreover, in compliance with the Legislative Decree n. 231, 8 June 2001,Ronchi has drawn up its own Organisation, Management and Control Model, in order to prevent, as far as possible, the commission of offences by directors, employees and third parties in general.

Considering that the use of the company's informatic and telematic resources must always be inspired by principles of diligence and fairness, attitudes which are intended to support any act of behavior carried out within the working environment, it is deemed to adopt further internal rules of conduct in the informatic field, aimed at avoiding unconscious and/or incorrect behavior.

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## 2. Definitions

In this IT Code of Ethics certain terms take on specific meaning, which, to be clear, we explain below:

- **COMPANY** : the companies of the Ronchi Mario S.p.A group.
- **SUPERVISORY BOARD**: the control board referred to in Art.6, letter B of Legislative Decree n. 231/01.
- **COMPUTER EQUIPMENT**: any instrument used by each corporate user for the performance of its function, including but not limited to PCs, smartphones, telephones, printers, etc.
- **COMPUTER SYSTEM**: the set of resources, data, applications and programs on computer equipment and media;
- **COMPUTER USER**: any person, even if not an employee of the company, who has been assigned one or more IT equipment and/or has been enabled to access or use the company informatic system.

## 3. The IT company system

All computer equipment, related programs and/or applications entrusted to company uses are, pursuant to Article 1 (“Relationship with the Company”) of the CCNL of metalworking and plant installation industry, work tools. Therefore:

- such tools must be kept in an appropriate manner;
- such tools may be used only for professional purposes (in relation to the tasks assigned) and not for personal or, even worth, unlawful purposes;
- it is not permitted to lend or transfer any computer equipment to third parties without the authorization of the Informatic System Manager;
- it is not permitted to remove identification marks from the computer equipment;
- the theft, damage or loss of such computer equipment must be immediately reported to the Information System Manager, the Human Resources Department and your own Department. In

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addition, in the event of theft or loss of computer equipment of any kind, the person concerned or the person who has taken delivery of it, shall send to the Information System Department the original report of the public authority within 24 hours from the event;

- it is absolutely forbidden to introduce and/or keep in the company ( in paper, computer and by means of company tools), for any reason and with any computer tool, document and/or computer material belonging to third parties, whether or not of a confidential nature, without the express consent of the owner. In case of violation the personal civil and criminal liability of the employee shall apply, as well as disciplinary sanctions by the company;
- it is absolutely forbidden to transfer outside the Company and /or to transmit files, documents, drawings, project or any other confidential or in any case proprietary documentation of the Company by means of any computer, hardware and paper instrument, except for purposes strictly related to the performance of one’s duties and in any case with the prior authorization of your Manager;
- it is absolutely forbidden to share in the common areas (such as, for example and without limitations, workplace/network folders etc.) or , in any case, to circulate internally by means of any IT instrument, hardware and paper, documents and information not pertinent to the tasks/professional activities of both the Addressee and the sender;
- it is not allowed to store in the company’s computer system documents of an insulting and or discriminatory nature due to gender, language, religion, race, ethnic origin, opinion and trade union and/or political affiliation;
- it is not allowed to store company documents on unauthorized supports (such as, by way of example, mobile memories, USB keys, etc);
- in the event of termination of the employment relationship for any kind of reason, company users must return to the Human Resources Department all the informatic equipment and work tools assigned to them in the conditions in which they were used. The cancellation of data recorded on IT equipment and work tools shall take place in the presence of the Staff of the Information System Department;

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- at any time, the company reserves the right to dispose otherwise of the IT equipment assigned to company users, to request its immediate return and/ or to carry out check on the same in order to ascertain its correct use.

#### **4. Use of IT media**

For the purposes set out above, acts or behavior in conflict with the afore mentioned indications should therefore be avoided, such as those referred to the following, for example:

- in order to avoid the serious danger of introducing computer viruses as well as altering the stability of computer's applications, it is permitted to install programs coming from outside only if expressly authorized by the Information System Manager;
- it is not permitted to install or use programs that have not been authorized by the Information System Manager, who will assess the compliance with the rules set out in Law April 22, 1943 n.633 on the legal protection of software and copyright;
- it is not permitted to modify the configurations set on the IT equipment without the prior authorization of the Head of Information System;
- it is not permitted to install and/or connect additional devices to the IT equipment without the authorization of the Information System Manager;
- PC equipped with CD/DVD players may not be used to listen to audio or music files, or to view videos and films, except for purely work-related purposes. Moreover, it is not permitted to save them on the company devices;
- it is not permitted to leave assigned computer equipment unattended and /or accessible to others. During long absences the PC device lock function must be activated;
- it is not permitted to leave unattended and/or accessible to others any mobile IT equipment (laptop, PDA smartphones, video projectors, mobile phones) while traveling (car parks, airports, train stations, etc) or while away from the company( for holidays, weekends,etc.)

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## 5. Password

Passwords that allow access to the Company's network, in compliance with the security measures imposed by the Legislative Decree n. 196/2003, must be confidential; everyone has a duty to protect their secrecy.

Passwords must not be disclosed to other, nor must stickers reporting passwords be displayed on the PC. Passwords must be at least eight characters long; they must not contain references that can be easily traced back to the user; they must be changed on first access and at least every three months.

The use of passwords belonging to other company users is not permitted, not even for access to protected areas in the name and on behalf of the same, unless expressly authorized by the person in charge of the company user and the Data Controller.

## 6. Use of the company network

Network units must be used in a strictly professional manner and cannot in any way be used for other purposes. The company reserves the right to change the access authorizations to the company network and to the relevant applications if the integrity of the company's information assets may be endangered, even only potentially.

Any file that is not related to the work activity may not be located, even for short periods, on the company's computer system and IT equipment.

Each employee's access to any resource of the company's computer system (folders present in company network, shared areas, etc.) must be authorized by the manager according to the duties assigned to each employee; each company user must therefore use the company network for purposes strictly related to the performance of his/her duties, in accordance with the content of the authorization.

Each company user is required to safeguard the confidentiality of the data he/she handles, paying particular attention to shared data and to any hard copies of electronic data, immediately removing the data once the need for it has ceased; in particular, it is strongly recommended to

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protect with a password any document temporarily stored in the transit areas accessible to all company users. At any time, the company reserves the right to delete any data saved in the transit areas common to all company users within 24 hours of its saving.

It is not permitted to install and use software and/or hardware tools designed to intercept conversations (in any form: telephone, messages, emails, etc) and to falsify, alter or suppress the content of communications and/or company computer documents.

It is not permitted to connect PCs or other IT equipment not belonging to the company network, unless expressly authorized by the Head of Information System.

## **7. Use of the Internet and related services**

The company provides, limited to company users who need it, access to the Internet via the workstations within its competence. The internet connection must be maintained for the time strictly necessary to carry out the activities that made the connection necessary. Therefore:

- it is not permitted to visit sites that are not relevant to the performance of the assigned tasks;
- it is not permitted to download or store unauthorized documents and in any case those of an insulting and/or discriminatory nature on the ground of gender, language, religion, race, ethnic origin, opinion and trade union and/or political affiliation;
- it is not permitted to carry out any kind of financial transaction, including remote banking operations, online purchases except in cases provided for in the company's purchasing procedures;
- downloading any type of software from Internet is not permitted, unless expressly authorized by the Information System Manager;
- it is forbidden to register on sites whose content is not related to one's work activity; it is forbidden to use and consult, for non professional reasons, services such as forum, social networks, chat lines, newsgroup and to register in guest books, not even using nicknames;



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- it is not permitted to subscribe to forum, chat-lines, blog, newsletters or websites related to work activities, with a company e-mail address, unless specifically authorized in advance by the Manager.

Everyone is, in any case, directly responsible for the correct and lawful use of the company email, as well as for the content of the declarations and information transmitted; the only type of Internet connection allowed is that via the company network; other connections, such as those using the telephone lines provided, are not authorized by the company; at any time the company reserves the right to activate filters on Internet navigation, preventing access to sites that are not pertinent to the work activity, considered dangerous or that could potentially determine a violation of the Organization, Management and Control Model (“Model 231”) adopted by the company.

## **8. Use of the electronic mail**

The company provides, limited to business users identified by task and role, a nominal and uniquely assigned electronic mail box. The electronic mail box is also a work tool made available to carry out the activities related to the assigned tasks, therefore the address assigned to the company users is personal but not private. Each person is directly responsible, in disciplinary and legal terms, for the content of his/her own mailbox and the messages sent therein. It is considered useful to point out that:

- it is not permitted to use the electronic mail, internally and externally, for reasons that are not related to the performance of the assigned tasks;
- it is not permitted to send or store internal or external messages of an insulting and/or discriminatory nature on the ground of gender, language, religion, race, ethnic origin, opinion, trade union and political affiliation;
- any external communication, sent or received, could be shared and viewed within the company;
- it is not allowed to use the electronic mail of other company users to send communications in one’s own name or in the name of anybody else, unless expressly authorized by them; in

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case of absence, the company user is obliged to activate, from the office or remotely, an automatic “Out of office” reply message indicating the person to contact in case of emergency and his/her electronic and/ or telephone coordinates. The “Out of office” message must be activated for both internal and external senders;

- the staff of the Information System office, in his capacity of “trustee”, may access to the email box of absent company users and consult the necessary messages in compliance with the guarantees provided for by the regulations on the protection of Privacy and according to the circumstances described in a detailed procedure;
- individual e-mail boxes are created and assigned without the configuration of any sharing and/or rules. Each corporate user is therefore responsible for any sharing and/or rules applied to her/his e-mail box;
- it is not permitted to create, consult or use private email boxes;
- the company has made available some addresses shared by several company users, making clear the non-private nature of the correspondence. These addresses generally correspond to Management mailboxes. All external communications sent or received through these addresses may be archived.

## 9. Checks

The company reserves the right to carry out periodic checks, in accordance with the guarantees provided for by the regulations on the protection of privacy and labour law, on the company’s IT equipment assigned (including mobile phones), on the use of the same and of the relevant programs and/or applications, in order to detect the presence of computer viruses and to guarantee the integrity and security of the system, as well as their correct use, in addition to the fight against any behaviour that could put the integrity of the company’s assets at risk.

The company reserves the right to arrange, in accordance with the guarantees provided for by the regulations on the protection of privacy and labour law, specific, non-systematic controls on the

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use of e-mail and the Internet, through the analysis of data in order to verify the correct use of the services and to counter any behaviour that could put the integrity of the company's assets at risk.

If an employee has been authorized to access certain information on the company's computer system, such authorization shall be strictly limited to the performance of his/her duties in accordance with the authorization forms previously issued. The company may carry out periodic but not systematic checks on the profile of company users, in order to verify the methods of access and management of company data, as well as the consistency between the tasks assigned, the profile and the authorizations, identifying any behaviour that could put the integrity of the company's assets at risk.

The data analysed during these checks are not automatically or systematically associated with identified corporate users but could, through processing and association with other data, allow corporate users to be identified.

If violations of the authorization profile for access to company data are ascertained, the company will be entitled to take appropriate measures to protect itself, since such violations constitute a serious breach of law and of the employment contract.

Internet data is used only to obtain statistical information on the use of the websites and to periodically check their correct use; it is stored for a limited period of time. All the data in question could be used to ascertain responsibility in the event of any computer crimes against the company, as well as in the event of legal disputes.

We encourage you to report any violation of this IT Code of Ethics of which you become aware.

Your reports may be sent:

- by mail to the email address [odv@ronchi.it](mailto:odv@ronchi.it)
- by sending it to the attention of the Supervisory Body of Ronchi Mario S.p.A., via Italia 43, Gessate (MI).

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## 10. Non compliance with provisions and sanctions

Failure to comply with the provisions contained in this IT Code of Ethics may be subject to disciplinary measures such as reprimands, fines, written warnings, suspension from work for up to three days and dismissal, as well as to legal action.

The company shall be entitled to claim against those responsible for any damage resulting from non-diligence use or use that does not comply with the rules contained in this IT Code of Ethics. Pursuant to the Civil code and the CCNL for the Mechanical Engineering and Plant Installation Industry, company users may be held liable, also under disciplinary aspects, for theft, loss and any damage to computer equipment due to non-diligent use of the same; the relevant amount of damages may also be charged by pay slip.

Rev.	Description	Preparation	Check	Approvazione
00	First issue 24/11/2021	Information System	HR	CEO
		Diego Tressoldi	Giuseppina Pennisi	Gianmario Ronchi