



ETHICAL CODE RVM RETROVISORI

<i>Code:</i>	STD002
<i>Revision:</i>	C
<i>Revision date:</i>	20/10/2021
<i>Author:</i>	A.Poltronieri (Quality Manager)
<i>Approval:</i>	E.Polidoro (Plant Manager)

Indice

1. PURPOSE AND FIELD OF APPLICATION	2
2. GENERAL: THE BUSINESS ETHICS OF RVM	2
2.1. RVM STYLE	3
2.2. SHARING OF OUR CODE OF ETHICS	3
2.3. GOALS	3
3. COMMON VALUES	4
4. CORPORATE SOCIAL RESPONSIBILITY (CSR).....	4
4.1. DISCRIMINATION	4
4.2. FORBIDDEN CONDUCT – WHISTLE BLOWING.....	4
4.3. PREVENTION OF ANTI-CORRUPTION PRACTICES.....	5
5. HEALTH & SAFETY	5
6. RELATIONS WITH THIRD PARTIES	5
7. RELATIONS WITH POLITICAL, TRADE UNION AND SOCIAL ORGANIZATIONS.....	6
8. RELATIONS WITH THE PUBLIC ADMINISTRATION AND PRIVATE BODIES	6
9. SAFEGUARD AND PROTECTION	6
10. ANTI COUNTERFEIT	6
11. VIOLATIONS AND PENALTY CONSEQUENCES.....	7
12. CONFLICT MINERALS	7
13. ANNEX DOCUMENTS.....	7

Revisions index:

<i>Date</i>	<i>Rev.</i>	<i>Descrizione delle revisioni</i>
03/09/2019	A	New issue for IATF 16949:2016
22/05/2020	B	Added §12.
20/10/2021	C	Rev. §4.2 - Added§13 – new issue STD12

1. PURPOSE AND FIELD OF APPLICATION

The principles contained in present ethical code are aimed at all those who within RVM Retrovisori S.r.l (also referred to as "RVM", "Company") have management or administrative or production and control functions; to employees (i.e. all those people linked to RVM through a sub-contracted employment relationship) and for all external collaborators and suppliers.

All employees and collaborators of RVM Retrovisori S.r.l are recipients committed to observing the principles of the Ethical Code.

Collaborators, even after any termination of the employment relationship, must not share or make other unauthorized use of the information acquired during the performance of the assigned assignment.

2. GENERAL: THE BUSINESS ETHICS OF RVM

This Ethical Code of RVM was issued for the first time in 2019, with the aim of defining the criteria of conduct that are shared as much as possible within our organization; but also with the aim of fulfilling the requirements of the IATF 16949: 2016 standard, involving employees in a more participatory manner.

The policy of RVM Retrovisori is to pursue excellence in services and integrated safety solutions at the highest quality standards, enhancing professional skills and human capital to create value for the company, for customer satisfaction and the professional growth of Collaborators.

In the organizational and business fields, the concepts of individual awareness and responsibility are inevitably linked to the concept of “Corporate Social Responsibility”.

For RVM, Corporate Social Responsibility is configured as the ability to integrate one's business while respecting and protecting the interests of all internal and external partners, with an important focus on safeguarding the environment.

RVM considers respect, protection and environmental value as an integral part of its own business, therefore as the ultimate goal of its actions and not just as a simple means to achieve profits.

2.1. RVM STYLE

Nowadays in the modern industrial system it is mandatory to compete with integrity.

All this means doing own job in well way and with dignity but above all being inspired by principles and values that recall ethics and consent rather than mere obedience.

RVM put the health and safety of workers first, committing itself to building a serene work environment with the same opportunity for all. The application of principles collected in this document leads to the definition of the RVM Style.

2.2. SHARING OF OUR CODE OF ETHICS

One of the main goals of this document is to introduce an ethical evaluation, both in one's own behavior and in the evaluation of those of others, combining the moral sphere with the managerial one, individual responsibilities with those of the Company: consequently translating one's thinking into a concrete ethical action.

The same document is proposed as a "moral contract" signed by all company representatives, external collaborators and suppliers of the group.

A shared culture may not directly affect RVM's competitive position but, if applied in the right way, will indirectly contribute to the creation of a common ethical vision.

2.3. GOALS

Founded in 2012 from the vision and commitment of 4 partners, RVM presents itself in the industrial landscape as an important reality in the glass cutting and processing sector, mainly for the automotive industry but also for various sectors including:

- Earth moving machines
- Spare parts
- Motorcycles

and many more.

The dedication to work for the implementation and observance of social objectives has constantly, over the years, remained based on the observance of fundamental values such as integrity, respect for the environment, health and safety in the workplace.

Our company mission is oriented to the following goals:

- **Satisfy** the needs of the most qualified customers,
- **Protect, respect and safeguard** the environment and human heritage,
- **Assume and maintain** a leadership position in the Italian market,
- **Conquer positions** of the technological vanguard,

-
- **Offer** a product at the highest quality levels on the automotive market (in this regard RVM has certified its Quality System with the new IATF 16949: 2016 standard and the UNI EN ISO 9001: 2015 standard).

3. COMMON VALUES

The entire activity of RVM Retrovisori is oriented according to values identified in:

- **Integrity:** RVM asks in the performance of professional activities, as an essential condition, honesty, transparency, integrity and a sense of responsibility,
- **Professional diligence:** an indispensable requirement is a high level of knowledge and technical and practical skills for carrying out work activities,
- **Correctness and transparency in corporate information:** each operation, action or transaction must be duly registered within the internal Document Management system, authorized and verifiable, as well as accompanied by complete and exhaustive supporting documentation,
- **Confidentiality:** employees are required to communicate and process only the data strictly necessary, operating in compliance with the privacy regulations.

4. CORPORATE SOCIAL RESPONSIBILITY (CSR)

Further information can be consulted in procedure P.04 at §4.1 which refers to this document.

4.1. DISCRIMINATION

RVM Retrovisori S.R.L does not tolerate any form of discriminatory conduct or any form of personal offense or harassment and therefore undertakes to guarantee a work environment that categorically excludes any discrimination related to sex, race, religion or related to personal characteristics.

The Company firmly believes in the inclusion and development of the human values of each person, also as a source of improvement of one's competitive advantage, committing itself to creating a motivated and aware workforce, based on the understanding of people and the human values of the individual.

4.2. FORBIDDEN CONDUCT – WHISTLE BLOWING

RVM condemns any aggression, intimidation, threat or abuse of people and / or company assets.

The personnel is required, in the presence of behaviors of this nature, to inform the Plant Management who will conduct appropriate and specific investigations.

A special “letterbox box” is set up in the vicinity of the Canteen where each employee can, at any time, anonymously insert a piece of paper highlighting an alleged violation or presence of one of the behaviors mentioned above which he / she has witnessed.

All employees who come into possession of company assets must use them with care and in compliance with the corporate use for which they are intended.

4.3. PREVENTION OF ANTI-CORRUPTION PRACTICES

RVM undertakes to implement all the necessary measures to prevent and avoid corruption and extortion.

The Company prohibits the Recipients of this document from promising or offering economic benefits to third parties or in any other form in order to obtain an improper advantage and also prohibits accepting or requesting money or other benefits from third parties that are not reflected in the commercial activity: the only allowed exclusions are goods or other utilities that cannot be interpreted as seeking a whatever type of favor.

By way of non-exhaustive example, it is forbidden to:

- offer to third parties, for corrupt purposes, gifts or other benefits;
- recognize, directly or through third parties, members of the Public Administration cash or other benefits for facilitate decision-making processes concerning the Company or obtain undue advantages;
- promise or offer, directly or indirectly, contributions to politicians parties or politically engaged persons, as a means of obtaining an improper advantage.

5. HEALTH & SAFETY

The Organization is committed to ensuring working conditions that respect the dignity and health of workers with a focus on risk assessment, thus promoting responsible behavior by all.

The Recipients also undertake to personally contribute to the maintenance and quality of the work environment.

6. RELATIONS WITH THIRD PARTIES

RVM, in line with the values it bears, governs relations with third parties, whether private or public, according to the principles of honesty, fairness and mutual trust.

The selection and relationships with external suppliers take place on the basis of impartial assessments based on reliability, quality, price and the service provided.

The selection of external collaborators is based on criteria of merit, competence and professionalism.

All suppliers and Collaborators are required to know and observe the Principles of this Code of Ethics and any behavior of an external Collaborator that appears contrary to the Principles of this Ethical Code must be reported to their manager / process owner and / or, in any case, to the Plant Management.

7. RELATIONS WITH POLITICAL, TRADE UNION AND SOCIAL ORGANIZATIONS

RVM promotes dialogue and cooperation with trade union associations.

The Company itself refrains from making any form of direct or indirect contribution to parties, associations or movements or other bodies of a political or trade union nature, or to their representatives.

8. RELATIONS WITH THE PUBLIC ADMINISTRATION AND PRIVATE BODIES

Relations with the Public Administration and with the related administrators and representatives can only be undertaken by those who have been explicitly appointed and authorized to carry out such activities in accordance with the principles of this code of ethics.

In the absence of the aforementioned authorization, relations with the Public Administration and Private Entities are reserved for subjects who hold the power of direct representation.

9. SAFEGUARD AND PROTECTION

RVM is well aware of the protection of environmental resources, therefore in order to pursue this goal it undertakes:

- the minimization of environmental impacts
- the adoption of ecologically efficient technologies

RVM is committed to spreading an environmental culture suitable for prevention and pollution within its organization and among all its partners.

10. ANTI COUNTERFEIT

RVM assures its Customers the supply of original parts.

As an assurance of the absolute originality of the pieces produced, an ink jet is emitted on every single mirror (unless there are specific customer requirements) placed on the production line, which shows:

- The name of the company
- The date and time of production of the part
- The lot / order number
- The batch of material used to cut the part.

The identification of a non-RVM production part inside the RVM Plant or in a pallet / box or box from Supplier / Customer, if it occurs, would involve:

- immediate reporting to RSGQ and R.d.P,
- identification of the same with the red form M.06-04, with the causal defect "NON RVM" and transport to the Waste Segregation Area in the RVM factory,
- Analysis of the causes and reporting to the Customer / Supplier.

11.VIOLATIONS AND PENALTY CONSEQUENCES

If the Recipients become aware of a violation of this code of ethics, they must inform the Plant Management who will verify the validity of the alleged violation, to the extent of its competence (see also §4 of this document)

Any violation of the code of ethics will constitute non-fulfillment of the obligations of the workplace in accordance with the procedures set out in Article 7 of the Statute of Workers and the applicable collective bargaining, with all legal consequences also provided for with regard to the preservation of the employment relationship

12.CONFLICT MINERALS

RVM Retrovisori undertakes not to procure raw materials from conflict areas (e.g. Democratic Republic of Congo) with foundries that can exploit the procurement of the materials listed below (3TG) for purposes of enrichment and exploitation of the population, as well as for the continuation of wars and conflicts:

- **POND**
- **TANTALUM**
- **TUNGSTEN**
- **GOLD**

The STD12 document reports the Company's declaration regarding its commitment and compliance with EU regulation 821/2017, which entered into force on 01/01/2021.

Further evidence of the company's commitment is the annual compilation and sending to customers of the standardized CMRT declaration.

13.ANNEX DOCUMENTS

- STD12 - Conflict Minerals RVM Statement
- P.04 - Leadership, Management Commitment and Customer Satisfaction