



Italian penmakers since 1968

**MADE IN
ITALY
PROMOTIONAL
PENS**

Ethical code

Premise

Who we are

We are manufacturers of promotional objects since 1968 and since 1990 we have specialized in writing instruments. By combining production with a customization department, we have developed exclusive customization techniques that have led us to be unique in the sector by combining technology, quality and creativity.

Our commitment

Responsible management has always been a strong point and has allowed us to overcome every obstacle and accept continuous challenges. Correctness, efficiency, innovation: our principles inspirational, from the design to the creation of the finished product in an all-Italian journey.

Purpose of the code

This code of ethics summarizes our principles and values so that they can be shared with our stakeholders of whom we ask, in their work, to respect its principles in accordance with Italian and European laws.



THINK GREEN



Growing, always

Mission

Our commitment to the environment

We are constantly committed to improving ourselves and improving production processes and internal procedures in order to reduce their impact on the environment.

Our sustainability projects

they led us to:

30% reduction in packaging

reduction of paper consumption by 50%

reduction of energy consumption by 20%

40% reduction in transport thanks to direct logistics

70% reduction in air and car travel thanks to video meetings and train travel

We don't stop here

because the desire to improve is in our DNA.

Ethics

Work

The Code of Ethics defines the rules of conduct to be respected in relations between Recipients and in relations with the Public Administration, suppliers and third parties in general.

All company activities must be carried out with the utmost scrupulousness, honesty, loyalty and professional commitment, in compliance with the laws, procedures, company regulations and in compliance with the Code of Ethics, the rules of which constitute a substantial part of the contractual relationship. .

The conduct of the Recipients, at all company levels, is based on the principles of legality, correctness, non-discrimination, confidentiality, diligence and loyalty.

The Company complies with all provisions, both national and international, regarding associated delinquency and the fight against money laundering and expects compliance with these regulations by all Recipients of this code.



Legality



Inclusivity

People

Non-discrimination

We reject any discrimination regarding age, sex, race, sexual orientation, state of health, political opinions, religion and nationality and favors integration by promoting intercultural dialogue and the protection of everyone's rights.

We firmly oppose episodes of mobbing, stalking, psychological violence and any behavior detrimental to the dignity of the person inside and outside company premises.

Relationships between colleagues must be carried out with loyalty, correctness and mutual respect, in compliance with the values of civil coexistence and people's freedom.

No discrimination is accepted or tolerated.

Staff selection

The selection of personnel is carried out respecting equal opportunities in order to combine the needs of Erga with the professional profiles, ambitions and expectations of the candidates. Staff are selected on the basis of skills, characteristics, attitudes and experience without any preclusion and in a transparent manner.

Safety

Health & Safety

We keep the Risk Assessment Document constantly updated, highlighting possible points for improvement.

The Competent Doctor defines the protocol based on the outcome of the risk assessment and it is always possible to request a visit from collaborators.

All employees are equipped with Personal Protective Equipment in order to protect themselves from residual risks.

All workstations are designed and adapted to minimize musculoskeletal problems.

No disability is discriminatory for the performance of the work.

Any disability situations that staff may have are considered in the assignment of the job and the design of the workstation.



Health



Trust

Privacy

Confidentiality

Erga respects the privacy and confidentiality of stakeholders' personal information.

The personal data of collaborators, customers and suppliers are acquired solely to carry out work operations or to comply with regulations.

No one must use confidential data learned as a result of their work activity, except for work purposes.

Erga respects and protects the confidential information of stakeholders and applies legal measures regarding the protection of personal data to prevent accidental disclosure.

Fair competition

The competitive market

Fair competition is a healthy incentive for innovation and development processes and must be achieved in compliance with European regulations.

We do not willfully infringe the intellectual property rights and confidential information of third parties.

The Recipients are required to maintain maximum confidentiality on documents suitable for revealing know-how, commercial information and corporate operations.

The relationship between Erga and its employees is based on mutual trust: employees are required to work to promote the interests of the company, in compliance with the values of this Code.



RESPECT



Correctness

Impartiality

Conflict of interest

In carrying out their activities, the Recipients are required not to accept donations or favors of any kind for the purpose of granting advantages to third parties and must not make donations of money or goods to third parties or offer benefits or favors of any kind in connection with the activity. provided for the benefit of Erga

The intrinsic conviction of acting in the interests of the Company does not exempt the Recipients from the obligation to disclose any conflicts of interest to the company.

In cases where the possibility of a conflict of interest exists, staff are required to contact their hierarchical superior so that the company can evaluate the potentially conflicting activity.

In cases of violation, the Company will adopt all appropriate measures to put an end to the conflict of interest, reserving the right to act for its own protection.

Relations with the outside

Relationships with the Authorities and with the Public Administration must be based on maximum clarity, transparency and collaboration in full compliance with the law and according to the highest moral and professional standards, abstaining from any form of pressure aimed at obtaining any undue advantage.

The Recipients cannot relate in the name and on behalf of Erga with the Authorities and the Public Administration.

Erga does not favor or discriminate against any political or trade union organization and refrains from providing any undue contribution to parties, unions or other social groups.

The Recipients relate to third parties with courtesy, competence and professionalism, in the belief that the protection of the company's image and reputation depends on their conduct.

The choice of suppliers is made based on objective criteria of cost-effectiveness, opportunity and efficiency.

The Recipients must implement every possible control so that suppliers and customers are also able to respect the fundamental ethical principles of this Code.



Clarity

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The Code of Ethics was approved by the BOD of Erga S.r.l.
Minutes of March 21, 2022