



Code of Ethics and Conduct



ARREGHINI®
ITALIAN PAINTS SINCE 1950

“Happy and engaged
people will speak well of you...”

CAP ARREGHINI: a way of thinking, but above all, of acting, to integrate values into corporate strategy

CAP ARREGHINI believes that business ethics stem from the morally positive and personal commitment of the individuals who work within and alongside the company, guided by principles of fairness, loyalty, reliability, and honesty — and by a sense of responsibility toward others and colleagues.

CAP Arreghini considers these moral values as fundamental principles of its corporate philosophy, believing that their observance represents not only an ethically sound commitment but also a source of enrichment for the company itself — a primary and essential value. These are the principles that have shaped the birth and development of the company and must continue to guide its growth.

CAP ARREGHINI's goal is to be a responsible member of the economic and social community in which it operates. For us, behaving in a socially and ethically responsible manner is therefore an obligation.

It is essential and indispensable that the image each of us conveys of CAP ARREGHINI is always associated with respect for people, fair and safe working conditions, and environmentally responsible practices.

Moreover, it is our duty to give everyone who works for CAP ARREGHINI a reason to be proud of our company!

Because we have chosen to act as a group, and since growth requires shared moral rules and values, CAP ARREGHINI has decided to adopt an Ethical and Behavioral Code that, in line with the principles of loyalty and honesty, sets out the policies and guidelines that govern relationships within the company — among employees — and with external stakeholders such as clients and suppliers.

This Code must therefore be regarded as a true guide, reminding all those to whom it applies how to behave in order to ensure that the company maintains the reputation it has built over decades of activity — a reputation grounded in respect for people, laws, rules, and the common good.

Gigliola Arreghini

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STANDARDS OF CONDUCT AT CAP ARREGHINI

CAP ARREGHINI is built upon a core set of values deeply rooted in our corporate culture — a constant point of reference for our way of thinking and acting.

Moral integrity and professionalism in daily work are fundamental conditions for ensuring mutual trust.

Behavior guided by these core principles and compliance with current regulations will allow us to remain a leading company in the paints and coatings market — not only from a business perspective but, above all, from an ethical one — toward employees, institutions, suppliers, and customers alike.

The purpose of the Code of Ethics and Conduct is to define simple, clear, and precise rules so that the pursuit of shared goals, the success of our company, and organizational well-being always take precedence over individual interests.

We want to ensure that CAP ARREGHINI's ethical values are always upheld, clearly defined, and serve as the standards of conduct, as outlined below:

1) Respect

Respect must be understood as transparency, sincerity, and understanding toward the people who work with us.

Critical moments must always be constructive and aimed at improvement: actions or behaviors may be corrected, but never the person. Praise should be given publicly, while feedback should always be shared privately.

The respect shown toward people must also extend to the workplace and company assets, as these are the tools of our success. They must always be kept in good working order, clean, and organized.

2) Engagement

To involve and be involved means listening to people without prejudice, understanding their expectations and needs.

We never consider a person only for who they are, but also for who they could become.

We keep everyone informed about our goals and achievements.

We communicate ideas — even the simplest ones — as they could turn into great successes!

We always convey strong motivation to those who work with us.

The company belongs to everyone: we should always say “we”, never “I”.

We must be proud to be part of a respected and esteemed organization.

3) Concreteness and Initiative

We focus on the practical side, act with determination, base our actions on data and facts, and plan as much as possible to avoid problems and wasted time.

We always evaluate the cost-benefit ratio of the ideas we propose and the projects we develop.

We give structure and continuity to our work.

Our company welcomes dynamic and proactive people — not passengers, but leaders.

Vitality and energy are the foundations of our company's proper functioning.

We should never look for excuses to avoid tasks. We lead by example.

Dynamism is contagious — we must always set an example for everyone.

4) Responsibility and Delegation

It is essential to be aware that we are accountable for our actions and must solve problems without shifting the burden onto others.

Those in managerial roles also have the responsibility to supervise the work of those under their direction and control.

If responsibility causes discomfort, it means one lacks the necessary knowledge to handle it; in such cases, one should not give up but instead seek the knowledge required to face responsibilities confidently.

As our company grows, it becomes increasingly necessary to delegate responsibilities and encourage people to take initiative.

Those to whom authority and responsibility are delegated must act in accordance with company procedures, accepting that collaborators may make mistakes at first — since recognizing and learning from errors can lead to personal growth.

5) Humility and Desire to Learn

Never take anything for granted or assume it is already known.

Avoid any kind of presumption — recognizing one's limits is essential.

We must make the most of every experience and always be open to self-improvement.

Sharing one's knowledge helps others and also benefits oneself.

We should always seek to learn as much as possible from external contacts.

Let's preserve and nurture curiosity. Let's help people grow.

Training is the investment we make in the most important resource we have: ourselves.

6) Teamwork

It is important to feel part of a team, not just individual “players”.

It is the team that wins — not the individual.

We must never forget that our work always affects that of our colleagues.

The team should meet regularly to solve problems and set objectives.

A team is a group where roles are clearly defined and where there is a leader/coach who coordinates the activities.

In the eyes of the customer, it is always the company that performs well or poorly, not the individual.

CAP ARREGHINI'S GUIDING PRINCIPLES

OUR OBLIGATION TO COMPLY WITH THE CODE OF ETHICS

Each of us is required to read and comply with this Code of Ethics and Conduct, adhering to its provisions and any future updates.

Violation of this Code undermines the relationship of trust established with CAP ARREGHINI and may result in legal action or disciplinary measures, in accordance with applicable laws and contractual regulations.

Additional responsibility lies with managers, who must demonstrate through their actions the importance of following the rules, lead by example, and be available to employees with ethical concerns or reports of possible violations.

Each of us must report to our supervisor any behavior that, in good faith, we believe to be contrary to the law or to the Company's Code of Ethics.

RESPECT AND PROTECTION OF HUMAN RIGHTS

CAP ARREGHINI recognizes the key role of human resources, believing that the main success factor of any company is the professional contribution of its people, within a framework of loyalty and mutual trust.

Work relationships are managed to ensure equal opportunities and to promote everyone's professional growth.

Within their roles, all individuals are expected to foster a workplace free from prejudice and respectful of each person's individuality, actively helping to maintain an internal climate that safeguards everyone's dignity.

Relationships among colleagues, regardless of hierarchy, must be based on civility and respect for individual rights and freedoms.

Each manager exercises authority objectively and fairly, ensuring the professional growth of collaborators and improvement of working conditions.

Each employee is expected to act cooperatively, fulfilling their duties responsibly, efficiently, and diligently.

Each employee maintains a cooperative attitude, performing their duties with responsibility, efficiency, and diligence.

EXTERNAL PARTNERS

Sales agents, consultants, representatives, independent contractors, temporary external workers, and suppliers are required to adhere to the same standards of conduct as the employees of our company when conducting business with or on behalf of CAP ARREGHINI.

No internal or external collaborator is authorized to engage in any activity prohibited by company policy.

ENVIRONMENTAL PROTECTION

CAP ARREGHINI is committed to ensuring that its products, services, and production processes contribute to sustainable development.

Product design therefore aims to reduce their negative environmental impact throughout their entire life cycle, while continuous monitoring of resource and energy consumption, waste generation, and pollution is intended to introduce improvements that promote greater efficiency and savings.

We must make a constant effort to reduce energy and water consumption, use less paper and fuel, minimize noise in all its forms, limit waste production as much as possible, and properly manage contaminated materials.

HEALTH AND SAFETY AT WORK

CAP ARREGHINI is committed to ensuring, in compliance with current legislation, a safe and healthy work environment for its employees by adopting all necessary measures, promoting a culture of safety and risk awareness, and encouraging responsible behavior among its staff.

Each employee and collaborator is directly responsible toward their colleagues and the company for maintaining the quality of the work environment.

Employees are required to prevent and limit situations that could negatively affect that quality.

PROTECTING INFORMATION

It is the duty of all employees to protect CAP ARREGHINI's confidential and proprietary information, as well as that of its clients and suppliers.

Such information may include financial data, commercial and promotional plans, technical data, information about employees and customers, and other types of information.

Accessing, using, or disclosing such information without authorization could harm CAP ARREGHINI or third parties; therefore, employees are strictly prohibited from accessing, using, or disclosing such information without proper authorization.

If an employee is unsure whether they are authorized, they must seek clarification. Each member of CAP ARREGHINI must:

1. Not disclose to anyone any information that CAP ARREGHINI has not made public
2. Not access, duplicate, reproduce, or use company-owned information — directly or indirectly — except as required for their duties and work for CAP ARREGHINI
3. Immediately report any unlawful use or handling of confidential information to their direct supervisor or company management
4. Not store CAP ARREGHINI information on private computers

CHARITY AND SPONSORSHIP

Since 2011, the company's charitable activities have been directed toward the Care & Share association, to support and assist poor and needy children in India living in disadvantaged families without means.

Through this project, CAP Arreghini is committed to sponsoring children remotely, providing them not only with shelter, food, and clothing, but a real HOME — with substitute parents who care for them and give them the attention they need to grow with human dignity, an appreciation for the value of life, and confidence in themselves. They can also receive an adequate education or learn a trade that will help them find work more easily, giving them a real and concrete opportunity for social inclusion.

The company also helps support cultural, social, and sporting activities in the local community where it operates, with particular attention and sensitivity toward young people.



CAP ARREGHINI SPA - V.le Pordenone, 80 - 30026 PORTOGRUARO (VE) - ITALY
Tel. +39 0421 278111 - info@caparreghini.it - www.caparreghini.it
Azienda con Sistema Certificato UNI EN ISO 9001 - UNI EN ISO 14001