



2022

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# CODE OF ETHICS

Jaumann S.r.l. Unipersonale

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Adopted by Leonardo Jaumann

11 / 02 / 2022

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JAUMANN S.R.L. UNIPERSONALE

Via S. Giovanni sul Muro n. 13, 20121 Milan, Italy

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# CODE OF ETHICS

of Jaumann S.r.l. Unipersonale

## 01 INTRODUCTION AND OBJECTIVES

Single-member private limited company Jaumann S.r.l. unipersonale (hereinafter also referred to as the "Company") provides services in the field of industrial and intellectual property law, and more specifically concerning patents, models, or designs, and trademarks, as well as a series of additional services relating to the protection of industrial property.

The Company has adopted this Code of Ethics (hereinafter also referred to as the "Code") in order to set out, clearly and transparently, the values underpinning its activities.

Jaumann S.r.l. unipersonale considers ethical conduct to be both one of the Company's value and also a key to its success; accordingly, its conduct in internal relations and in dealings with the outside is based on underlying principles such as honesty, moral integrity, transparency, reliability, and a sense of responsibility. More specifically, the importance of the ethical principles set out in this Code also helps confirm the Company's credibility in the eyes of its customers, suppliers, and its staff, turning their appreciation of the characteristic values of the company's *modus operandi* into a competitive advantage.

## 02 PARTIES TO WHOM THE CODE APPLIES AND SCOPE

The principles and provisions of this Code of Ethics apply to all of the Company employees ("Parties to whom the Code applies"). Furthermore, all those who have relations with Jaumann S.r.l. unipersonale in any capacity are also required to comply with the principles contained in the Code.

The Code set out the rules of conduct which must be observed when performing professional activities and provides the guidelines which must be followed in relations with colleagues and dealings with customers, suppliers, other companies, associations, authorities, trade unions, and public institutions.

The Code will be made known to third parties that receive assignments from Jaumann S.r.l. unipersonale or establish either permanent or temporary relationships with it.

All the Parties to whom the Code applies undertake to act with loyalty, professionalism, honesty, competence, and transparency, in full compliance legislation in force.

Jaumann S.r.l. unipersonale monitors compliance with the Code carefully, providing appropriate tools and procedures concerning information, prevention, and control, ensuring transparency of actions and conduct, and - if necessary - intervening with corrective actions.

### 03 ETHICAL PRINCIPLES AND CORE VALUES

All the Parties to whom the Code applies, without distinction or exception, must conduct themselves in accordance with the principles and contents of this Code within the scope of their duties and responsibilities, with the understanding that compliance with the Code is an essential part of the quality of their work and professional performance. Relations between and among staff, at all levels, must be grounded in conduct and principles based on honesty, fairness, collaboration, loyalty, and mutual respect.

In no way can the belief that one is acting for the benefit or in the interest of the Company justify, not even partly, conduct which breaches the principles and contents of the Code.

#### More specifically:

- A. each Party to whom the Code applies must carry out their work and/or their assignment or duty with professional commitment, diligence, efficiency, and fairness, making the best use of the tools and time available to them and assuming the responsibilities associated with the commitments undertaken;
- B. all the actions and activities performed and the conduct adopted by each of the Parties to whom the Code applies when going about their work and/or their assignment and in dealings with customers must be grounded in transparency, fairness, and mutual respect, as well as lawfulness in terms of both form and substance, and in compliance with applicable legislation and internal procedures, also for the purpose of protecting the Company's assets and image;
- C. each Party to whom the Code applies is responsible for protecting and conserving corporate assets, whether tangible or intangible, entrusted to them in order to go about their duties, as well as for using them properly and in accordance with the Company's purposes. Information, documents, data, and knowledge must be acquired, used or disclosed only by persons who are authorised to do so in general, as a result of their position within the company or who have been specifically appointed to such tasks;
- D. information concerning third parties who come into contact with the Company through negotiations, correspondence, the completion of business, or any other company activities is deemed Confidential and subject to the provisions set out above in this Code, and therefore cannot be disclosed, unless specifically provided for by law.

Furthermore, all the Parties to whom the Code applies undertake:

- A. not to pursue, when going about their work, personal interests which conflict with those of the Company;
- B. not to orient business opportunities intended for the Company directly or indirectly towards their own benefit or to that of third parties;
- C. not to use information obtained when performing their corporate duties to acquire either direct or indirect advantages, avoiding any misuse and unauthorised use of such information;
- D. not to disclose confidential information except as strictly necessary in order to perform their duties for the Company;
- E. not to conduct themselves in a harassing manner in the workplace, for example, not to interfere without reason in the performance of other people's work and not to obstruct other people's career prospects merely for reasons of personal competitiveness.

## 04 PROTECTION OF WORKERS' RIGHTS AND DIGNITY

Jaumann S.r.l. unipersonale acknowledges the central role played by human resources and believes that the professional contribution of the people who work within and with the Company is pivotal to its success and growth; in line with this, the Company is also committed to maintaining a safe and healthy work environment which complies with all applicable legislation in force.

Each Party to whom the Code applies, within the scope of their position, must strive to ensure a work environment that is free of prejudice and respects the personality of the people who work within it; concerning this aspect, the Parties to whom the Code applies must endeavour to maintain an internal climate that guarantees respect for everyone's dignity. Relationships between and among the Company's employees must be based on the values of coexistence and compliance with the rights and freedoms of individuals, as well as the fundamental principles of equal social status, unhindered by discrimination for any reason, such as nationality, language, gender, sexual orientation, gender identity, disability, race, religious beliefs, political or trade union membership, or physical or mental conditions. Relationships between and among employees must be built on loyalty, fairness, and respect, regardless of the level of responsibility, or the role or position held within the Company. Any person with authority over another must exercise the powers connected to their corporate position objectively and with balance, giving due attention to the professional development of their co-workers and the improvement of working conditions. Each employee must conduct themselves in a collaborative manner, performing their duties with responsibility, efficiency, and diligence.

Jaumann S.r.l. unipersonale categorically rejects any form of child labour and any form of exploitation of workers, it protects workers from acts of psycholo-

gical violence and acts to counter any conduct which is harmful to individuals and likewise any form of discrimination based on gender, age, race, language, nationality, religion, personal and social conditions, sexual orientation, political opinions and those concerning trade unions. Therefore, all the Parties to whom the Code applies are required to undertake to prevent discrimination and likewise actions and/or conduct which are harmful to any individual, contributing to reaching this objective through their interpersonal relationships and by conducting themselves as individuals in a way which respects the sensibilities of others.

## 05 HIRING, WORKING HOURS, AND WAGES

Staff at Jaumann S.r.l. unipersonale are employed under standard employment contracts. Undeclared work is unacceptable, in any way or form. Upon establishment of the employment relationship, every employee is informed in detail of:

- the specifics of the job and tasks to be performed;
- salary terms and conditions based on applicable legislation;
- workplace safety rules and procedures.

Jaumann S.r.l. unipersonale acknowledges that all employees are entitled to form trade unions or join existing unions and to engage in collective bargaining, and the Company complies with all applicable national legislation on working hours.

The Company also undertakes to pay fair wages for the workforce and to comply with all laws relating to salary terms and conditions.

We reject any kind of discrimination, corruption, forced labour, or child labour.

Given circumstances relating to the Covid 19 emergency, Jaumann S.r.l. unipersonale has decided to adopt a smart and remote working policy to ensure the health of its staff and customers, which includes:

- the adoption of remote working according to the times and methods established by the owner of the Company;
- the safety of the offices according to laws in force and the supply of personal protective equipment (face masks, sanitiser gels);
- the undertaking to provide employees with the software, hardware, and skills required in order to work remotely.

At the same time, it promotes:

- the use of online messaging tools (video meetings, instant messaging) and work management (cloud storage, collaboration tools)
- proper life/work balance to guarantee all Parties to whom the Code applies a healthy, well-adjusted lifestyle.

## **06 RELATIONSHIPS WITH CUSTOMERS, SUPPLIERS, AND INSTITUTIONS**

In dealings with customers, suppliers, and institutions, each Party to whom the Code applies is representing the Company.

Customer care is pursued with competence, professionalism, courtesy, transparency, fairness and impartiality, with the understanding of the importance of meeting expectations and consolidating the trust placed in the Company.

Business dealings with suppliers are carried out in compliance with the criteria of impartiality, cost-effectiveness, transparency, loyalty and correctness, avoiding relationships that may generate personal advantages or conflicts of interest.

Dealings with local, national, EU, and international public institutions (“Institutions”) by employees, whatever their role or position, must be engaged in in compliance with legislation in force and grounded, in general, in fairness and loyalty. Any Parties to whom the Code applies acting on behalf of the Company in dealings with the Italian or foreign public administration authorities, must conduct themselves in a transparent and loyal manner, focussing particular attention on the confidentiality, integrity, and completeness of supporting documents.

## **07 BINDING NATURE OF THE CODE AND PENALTIES**

Pursuant to Articles 2104, 2105, and 2106 of the Italian Civil Code, compliance with the provisions of the Code of Ethics is an essential part of the contractual obligations of employees. The obligation to comply with this Code of Ethics is also provided for in agreements with independent contractors.

Breach of the provisions of this Code of Ethics (and of the company procedures relating to it) will result in the application of penalties to the Parties to whom the Code applies who have committed such breaches; such action is intended to protect the corporate interests and penalties will be applied compatibly with the provisions of the legislative framework in force. Indeed, such breaches damage the relationship of trust established with the Company as this is grounded in transparency, fairness, integrity, and loyalty.

Rather than a purely legislative requirement, the Code of Ethics is intended first and foremost to fulfil an ethical function concerning conduct; going beyond an approach based merely on the application of penalties, the Code aims to achieve a widespread sharing of common principles in the management of work relationships, both within and outside the Company.

## **08 RESPONSIBLE PARTIES**

The head of the Company’s personnel department ensures disclosure of the Code of Ethics and the principles contained therein by publishing the Code

on the website and providing to each new employee with a physical copy of the Code of Ethics.

Dissemination of the Code of Ethics must also be properly guaranteed in all the Company's relationships with external parties.

Responsibility for the proper functioning of the internal control system lies with all the Parties to whom the Code applies of the Code, within the scope of their roles and duties. Each employee must promptly inform their direct manager should any circumstances arise which could interfere with the proper management of the work activity.

All questions, problems, or requests for clarifications must be addressed in a clear, concise manner and sent by email to the following address: [ethics@jaumann.eu](mailto:ethics@jaumann.eu).

## **09 ENTRY INTO FORCE AND CHANGES TO THE CODE**

The entry into force of the company Code of Ethics must be authorised by the Company's owners.

Any amendments and/or additions to this Code must be made in the same way as when it was initially approved.