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1 Introduction

Present document is intended to synthetically present NUOVA STAR S.p.A. Company, Quality and Ethical Policy; it is addressed to all of corporation stakeholders. A specific focus is put on the Quality pillars which represents the basis to achieve expected outcomes.

2 Company policy

NUOVA STAR S.p.A. aims to be the best hinge manufacturer company in the world, as measured by customers, employees, and by the entire stakeholders. Competitiveness increasing, in a market extremely oriented in meeting Customer needing and requirements, drives business and management strategies and the entire company policy to pursue the following leanings:

- "External" oriented:
 - Customer loyalty.
 - Business development, brand reinforcement, market shares.
 - Flexibility and fast response to market.
 - Perception consolidation of organization effectiveness and efficiency.
- "Internal" oriented:
 - Value creation aptitude.
 - Product innovation including research and development of related products.
 - Efficient and effective resources usage.
 - Renewal and updating of production tools and management methods.
 - Inspiring the entire structure towards continuous improvement.

NUOVA STAR S.p.A. management considers it crucial to involve all of the company's functions to achieve goals and objectives identified as key point of company policy. Such company's functions involvement is gained through an organizational set-up which defines activities within a proper "Company Quality System" and a robust "Company Ethical Policy".

3 Quality Policy

NUOVA STAR S.p.A. aims to build its Quality Policy on the following key points:

- Identification and appropriate supervision of relevant activities to observe regulations and norms requirements and to satisfy Customer's needing and expectations.
- Exclusive acceptance of contracts for which it is possible to ensure full compliance with the qualitative requirements in according with Company "Know-how" and equipment. Adjustments in company structure and operative models are conceivable to meet any new requirements.
- Supply chain scouting and qualification to identify qualified and reliable suppliers.
- Implementation and maintenance of a "Company Quality System" to be assessed by Customers and certified by accredited bodies.
- Improving company perception from entire stakeholders through an incessant process of verification / analysis / recursive actions on management procedures and work products.
- Accurate and systematic control of management and operations costs oriented to a continuous improvement of the cost-effectiveness activities.

4 Ethical policy

The following chapter summarizes the commitments and ethical responsibilities in the business conduction, development and related to all the Company activities undertaken by all NUOVA STAR S.p.A. personnel, whether they are directors, managers, employees, agents or any collaborators linked to the Company from contractual relationships in any capacity, even occasional and / or only temporary.

NUOVA STAR S.p.A. requires its suppliers and partners to adopt conduct in line with the general principles of this code.

The behaviour of anyone, individual or organization, who tries to appropriate the benefits of others' collaboration, taking advantage of positions of strength, is not considered ethical.

4.1 Sustainability and corporate responsibility

In the development of its activities NUOVA STAR S.p.A. is inspired by the protection and promotion of human rights, inalienable and unavoidable prerogatives of human beings based on the principles of equality, solidarity, environmental protection, protection of civil and political rights, social, economic and cultural rights, rejects all sorts of discrimination, corruption, forced labour or child labour.

Particular consideration shall be given to the recognition and protection of the dignity, freedom and equality of human beings, the protection of labour and trade union freedoms, health, safety, the environment and the system of values and principles of transparency and sustainable development, as affirmed by the Institutions and the International Conventions, such as the Universal Declaration of Human Rights of the United Nations and the fundamental Conventions of the ILO – International Labour Organization.

4.2 Behaviour and relationships with stakeholders

In any decisions that affect relations with any stakeholder (customers, staff, workers organization, selection and management of suppliers and partners, relations with the surrounding community and the institutions that represent it), NUOVA STAR S.p.A. avoids any discrimination based on age, sex, sexuality, health status, race, nationality, political opinions and religious beliefs of its interlocutors.

In hierarchical relationships, especially with entire internal staff and collaborators, NUOVA STAR S.p.A. ensures that authority is exercised with fairness and equality, avoiding any kind of abuse.

NUOVA STAR S.p.A. requires that in the internal and external work relations it is not given place to harassment or to attitudes however traceable to practices of mobbing that are all, without any exception, forbidden and condemned.

Any form of violence or harassment or sexual or related to personal and cultural differences is prohibited.

4.3 Conflict Mineral

NUOVA STAR S.p.A. supports the fight against violence, violation of human rights and against environmental degradation in the extraction and marketing of defined minerals coming from geographical areas defined as "Conflict Regions".

The legislation issued by the Securities and Exchange Commission (SEC) requires that raw material producers communicate whether the products they manufacture contain "Conflict Minerals".



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With the aim of ensuring that, the Nuova Star products are made using only “Conflict Free” materials and components, NUOVA STAR S.p.A. undertakes to:

- Request formally to suppliers of raw materials that the metals used come only from mines and foundries outside the “Conflict Regions” or if located in the “Conflict Regions”, which have been certified as “Conflict Free”.
- Formulate and develop appropriate actions towards its suppliers in case it is detected that the used materials and components are classified as “No-Conflict Free”.

5 Responsibility in Pandemic situation

NUOVA STAR S.p.A. supports his Employees, Customers and Suppliers in all the activities related to reduce the risk for people health and for production continuity.

Particularly for people health specific DPI's, adequate distance conditions, ambient sanitation are assured to reduce risks of virus transmission. Vaccine of people is supported.

For production continuity increase of stock and increase of working shift are supported in accordance with market situation and working disposition from Health and Safety Agency.