ATEX

Spun-Melt Solutions



Code of Conduct

Message from our CEO

Dear employees and partners,

Our mission is to contribute to the success of our customers by offering innovative, high quality and environmentally responsible products and services.

Respect, integrity, trust and excellence are the values that define us as a company and are our guide to do business, treat our colleagues, suppliers and customers, being the essence of our success.

In our new business strategy, we focus on corporate values. Compliance of this Code of Conduct is a determining factor in our positioning as a leading supplier with a global presence.

This Code of Conduct is a guide to help you always act and make the right decisions, following the principles and values that we must keep in mind in our professional activity. With your collaboration, we trust that ATEX will continue to grow in an ethical and responsible way.

To this end, we ask for your commitment to comply with this code, both among ourselves and with third parties, with the community and with society as a whole. Transparency, good governance and good practices must be the basis of our behavior.

Thank you for continuing to work together and for striving to uphold ATEX's ethical principles.

Luca di Benedetto





Code of Conduct
Our People

Regulatory compliance

ATEX respects the dignity and human rights of every employee. The Company is committed to maintaining a workplace free from forced labor, child labor, human trafficking, and all forms of exploitation. Employees are free to communicate concerns and report violations, without fear of retaliation.

The Code of Conduct applies to all ATEX employees, including management bodies, executive positions and control bodies.

Health and safety

At ATEX we are committed to provide, maintain, and continuously improve a safe and healthy environment for our employees and partners. We always comply with the Health and Safety legislation and regulations applicable to each case.

Safety is our top priority with the objective of “ZERO ACCIDENTS”. We focus on the fact that all accidents can be avoided by promoting a preventive culture, by informing and training all our employees, and by integrating safety criteria in all phases of the production process.

We are all responsible for contributing to a safe working environment by complying with the standards, best practices and legal requirements.

Training and development of people

Personal development, dialogue, training, reconciliation and recognition are the pillars on which we build our relationships. Our internal training system ensures the knowledge of our employees for each job and covers mandatory training in safety, quality and hygiene.

Diversity and equality

We are committed to diversity, appreciating our teams based on their competence, experience and performance. We do not tolerate any discrimination on the grounds of physical disability, illness, religion, sexual orientation, marital status, political opinion, age, nationality, racial origin or gender.

Harassment

It is ATEX’s policy to protect the dignity of its employees and all persons who come into contact with it. Harassment is not tolerated in any form and under any circumstances.

We encourage teamwork and respectful treatment in order to achieve a stimulating and committed working environment.

Child labor, forced labor

At ATEX we do not tolerate degrading working conditions, involuntary or forced labor, human trafficking or slavery, or labor under the legal working age. Weekly working hours and overtime do not exceed the established legal limit. Overtime is paid in accordance with the law. We ensure that remuneration is fair and adequate in line with the labor market.

Data protection and privacy

We respect current legislation on personal data protection, privacy, confidentiality and security of personal data of our employees and business partners. We take corrective measures to protect the above points; including raising employee awareness.



Code of Conduct

Our Business





Quality and safety of our products and services

At ATEX we pursue excellence in our products and services by providing added value that sets us apart. We do our best to continuously improve our processes to offer superior quality in our products and services, always trying to exceed our customers' expectations and contributing to the care and safety of the end consumers.



Fair competition

We are committed to being the supplier of reference in our sector, being fair and honest in our relationships. We establish bonds of trust by being transparent and open with our employees, customers, suppliers and society.



Intellectual property

We are committed to respecting industrial property, copyrights, patents, licenses and brand names.



Corruption and bribery

ATEX has zero tolerance for corruption and bribery. We do not offer or accept gifts, favors, entertainment, hospitality or other inducements that may reward or influence a business decision, with the aim of maintaining an independent business relationship at all times.

Our relations with third parties are based on the principles of transparency and equal opportunities, ruling out any action aimed at gaining an advantage over others based on an illegal act.



Confidentiality

We do not share confidential information, and we protect it from unauthorized access.

Our employees must exercise discretion and caution in the handling of confidential information and in their communications with third parties.

Our Business

Conflicts of Interest

At ATEX, we always act in the best interests of the Company and avoid situations in which our personal, family, or financial interests may conflict, or appear to conflict, with the interests of the Company.

Conflicts of interest may include, among others, personal or family relationships with customers, suppliers, or competitors, participation in external activities that may affect our professional objectivity, or any situation that could improperly influence decision-making.

Fiscal and financial responsibility

We comply with tax regulations and reflect the recording of accounting transactions in the financial statements on the basis of the applicable regulations and in a fully transparent manner. We also comply with annual financial audits.

Cybersecurity

ATEX provides electronic devices (such as computers, hardware and software, mobile phones) to do our job. It is our responsibility to use these tools professionally and to protect them. Any small mistake can compromise confidential company information, damage our reputation, and diminish our competitive advantage.



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Our Environment

Environmental Stewardship

At ATEX, environmental stewardship means manufacturing responsibly. We are committed to manufacturing practices that minimize our operational impact while supporting the long-term success of our business. We comply with all applicable environmental laws and regulations and continually seek opportunities to improve our processes and operational performance.

We produce high-quality products through efficient operations, the responsible use of raw materials, waste reduction, recycling initiatives, energy conservation, and continuous improvement.

Responsible manufacturing is fundamental to who we are. By conducting business ethically, respecting people, protecting natural resources, and continually improving the way we operate, ATEX is committed to delivering quality products while creating lasting value for our customers, suppliers, employees, and communities.

Improve local community

ATEX promotes collaboration with the local community. Participation is both a corporate and an individual responsibility. We all have the opportunity to make a positive impact and support our community.

Donations and Sponsorship

We can make donations for charitable purposes on a voluntary basis, without expectation of anything in return and in accordance with the regulations. All donations and sponsorships are intended to help those in need and must be approved in advance.

We verify the real destination of funds destined for donations and/or sponsorships based on the principles of transparency, honesty and traceability.



Code of Conduct

The Code into practice



Each of us is responsible to uphold the integrity of ATEX and to ensure that we act in accordance with this code, which means doing the right thing even when no one is watching.

ATEX provides its employees with various communication channels through which they may raise ethical concerns, report potential breaches of this Code, or communicate conduct that may constitute a violation of applicable laws or internal policies and procedures. ATEX promotes a culture of integrity, transparency, and open communication.

What kind of situations can I report?

You can report any situation that you think fits any of these examples:

- If you detect that any of the premises identified in the Code of Conduct are not met.
- If you suspect malicious, illegal or unethical behavior.
- If you detect that internal policies and procedures are not respected.

How to report a non-compliance?

- By discussing it with your direct supervisor, who will listen to you and guide you on the most appropriate course of action.
- For queries relating to ethical matters, conflicts of interest, or potential breaches of this Code of Conduct, please contact Human Resources, in person, by phone, or by email: atexhr@atex-usa.com

ATEX guarantees that all communications will be treated with the utmost confidentiality and respect for the individuals involved. Furthermore, ATEX will not tolerate any form of retaliation against anyone who, in good faith, reports a potential violation or cooperates in an investigation.

Entry into force

This Code is integrated into the framework of ATEX's internal policies and procedures. The Code of Conduct may be subject to periodic revisions. Each modification or integration must be approved by the Management Committee.



ATEX

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www.atex-spun.com

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