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# CODE OF ETHICS

## SA 8000:2014

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### Introduction

Filmop International was founded in the early 1970s as a company specialising in the manufacture of manual equipment for professional cleaning.

Located in the heart of Italy's productive north-east, today it is a leading company in the international cleaning industry and a trusted partner for professionals in the sector, proud to promote 'Made in Italy' around the world.

Filmop International now exports to over 80 countries worldwide with maximum speed, reliability and efficiency. It is present on the French and American markets with two distribution branches.

Among the principles that have inspired and guided Filmop International's growth since its origins are:

- Unrivalled production flexibility.
- A constant focus on customer satisfaction.
- Fast order fulfilment with quick and punctual deliveries.
- A strong drive towards innovation and research.

Filmop International's primary objective is to design and manufacture the best cleaning systems that meet the most different market needs, placing the well-being and health of people at the centre of every project, while respecting the environment in which we live.

In recent years, social responsibility has become an increasingly important and central issue. Ethical aspects such as fairness, responsibility, transparency, respect for human rights, respect for the environment, sustainable development, innovation and product quality are becoming increasingly important in the management of business activities and, more generally, in society.

The Code of Ethics therefore aims to define the principles, values and behaviours that should inspire the company's daily activities.

This document is an expression of the company's core values and represents a point of reference for every decision-making process with the aim of:

- Clearly define the values that inspire the Company's activities;
- Ensure the development, maintenance and strengthening of policies and procedures designed to protect social impact;
- Demonstrate and provide evidence to interested parties, whether internal or external to the organisation, of compliance with current national and international regulations and the organisation of improvement actions relating, in particular, to:
  - labour standards;
  - human rights;
  - environmental protection.

The Code of Ethics should be used as a guide and therefore:

- Every employee and collaborator is personally responsible for complying with the Code of Ethics and must always be accountable for it.
- Suppliers and Subcontractors are invited to read and comply with the social, environmental and quality commitments defined in this document.
- All other stakeholders are invited to read it carefully and to always bear its contents in mind.

Ethics and compliance with regulations relevant to the company in accordance with its activities, processes and achievements (environmental, safety, labour regulations, etc.) are a responsibility that the company intends to share with its business partners and all stakeholders.

# 1. Principles and guidelines

The principles set out below represent the cornerstone of this Code of Ethics and form an integral part of the conduct of the company's business.

In order to provide ever greater guarantees to its stakeholders, the Company promotes the sharing of the principles set out below through increased communication with the various parties involved.

## 1.1. Rules compliance

All stakeholders are required to comply with mandatory regulations, applying them fairly to all parties involved.

Anyone who becomes aware of situations that may appear to be non-compliant with the ethical values and rules of conduct set out in the Code is required to inform the Management or the Head of the Social Responsibility Management System or the Workers' Representative for Social Responsibility.

## 1.2. Personal protection

The company is committed to respecting the following ethical principles in relation to its personnel (employees, collaborators, etc.):

- Not to use or encourage the use of child labour.
- Ensure a safe and healthy workplace for all employees.
- Respect the right of workers to join and form trade unions.
- Do not discriminate in any way.
- Do not use or encourage corporal punishment, mental or physical coercion, or verbal abuse.
- Ensure compliance with the minimum wage levels set out in current legislation and the applicable National Collective Labour Agreement.
- Operate in compliance with international and national laws on products, the environment, safety, labour and the National Collective Labour Agreement.

Filmop International s.r.l. recognises everyone's right to privacy and prioritises the care of its employees, their health and safety in the workplace, professional growth, personal satisfaction and motivation.

The company is required to behave fairly in its mutual relations and to apply an employment policy based on equal opportunities for all employees and collaborators, listening to the needs and requirements of each individual in order to create a working environment that promotes the well-being of its staff.

The company undertakes to implement specific controls to ensure that its suppliers also show the same respect towards their employees and collaborators.

## 1.3. Integrity

Filmop International s.r.l. is a company in which legality, fairness, honesty, equity and impartiality of conduct both inside and outside the company are a common way of thinking and acting. Sharing these principles establishes lasting relationships with customers and suppliers, and general transparency in relations with third parties.

## 1.4. Transparency in relationships

The company is committed to:

- Maintaining open dialogue with stakeholders, paying attention to their expectations and clearly communicating the choices and commitments undertaken by the Company;
- Providing complete, transparent, understandable and accurate information, so as to enable recipients to make informed decisions in their relations with the Company.

### 1.5. Confidentiality

The company is committed to:

- Ensuring the confidentiality of the information in its possession, in accordance with the provisions of the law;
- Not using confidential information for purposes unrelated to the exercise of its professional activity.

### 1.6. Conflicts of interest

Directors, employees and collaborators must avoid situations that could represent a conflict of interest between themselves and the company. Similarly, they must refrain from taking personal advantage of the position, information and discretion associated with their role.

All employees and collaborators are required to report any potential conflicts of interest in which they may be involved to their line managers.

### 1.7. Environmental protection

Filmop International s.r.l. manages its activities with respect for the environment.

To this end, it is committed to using the most suitable technologies, preventing environmental risks and reducing direct and indirect environmental impacts. It pursues its activities with care to comply with environmental regulations, setting improvement objectives and targets in line with national and international standards, as well as mandatory requirements.

### 1.8. Health and safety protection

Filmop International s.r.l. is committed to spreading and consolidating a culture of safety among its employees and collaborators, developing risk awareness and promoting responsible behaviour.

To this end, it undertakes to:

- Maintain an active occupational health and safety management system;
- Defining specific objectives and improvement programmes aimed at minimising accidents and occupational illnesses;
- Taking responsibility for health and safety at work in the performance of its activities.

### 1.9. Customers

Customer satisfaction is a fundamental element for the growth of the company, which aims to be perceived as a solution provider, capable of understanding needs and offering high-quality services.

Organisation, professionalism and corporate culture evolve with customer service as a priority.

The product/service is at the centre of every activity and daily commitment. Filmop International s.r.l. focuses its efforts on innovation to create products of ever-increasing quality in compliance with applicable laws and technical and industry regulations.

The company is committed to promoting tangible improvements in its activities and introducing innovation in order to pursue customer satisfaction on an ongoing basis. Relationships must always be based on principles of ethical correctness, legality, integrity, transparency and professional fairness.

### 1.10. Suppliers

Suppliers are partners in achieving business success. The company is required to treat suppliers fairly. Fair competition should be encouraged, without discriminatory or unfair practices, with a view to stimulating the creation of lasting contractual relationships based on fairness and transparency. Similarly, suppliers are asked to operate in full compliance with the provisions of SA8000 and the correct rules of the SOCIAL world.

## 2. SA 8000 requirements

### 2.1. Child labour

The company does not use child labour as defined in the SA8000 standard, and promotes the same policy among its suppliers and stakeholders over whom it has influence.

Not only does the company not use child labour or the labour of minors who have not completed compulsory education, but it also uses suppliers who do not use such labour.

The focus on protecting children and young people also extends to respecting apprenticeships as a means of developing and acquiring work skills for young people.

The company is also committed to assigning young workers to activities that are appropriate for their age and do not involve dangerous conditions or risks to personal safety.

### 2.2. Forced or compulsory labour

Through work, individuals also have the opportunity to express their nature and inclinations. The Company considers work not only as a primary and fundamental form of livelihood, but also as an expression and manifestation of individuality.

For this reason, the Company does not envisage or permit, either at its production site or at the production sites of its Suppliers and Subcontractors, the exploitation of or recourse to forced labour in any form whatsoever; At the start of the employment relationship, staff are not required to leave anything that could be used as a means of coercion and/or blackmail (e.g. original identity documents and/or authorisation documents, cash deposits).

### 2.3. Health and safety

The company, bearing in mind the prevailing state of knowledge regarding the specific sector, guarantees a safe and healthy workplace and takes appropriate measures to prevent accidents and damage to health that may occur during or as a result of work, minimising, as far as reasonably practicable, the causes of danger attributable to the working environment.

Filmop International believes that employers are responsible for promoting all activities aimed at protecting the health and safety of all staff, in collaboration with their managers and supervisors, as well as employee safety representatives, the prevention and protection service manager and the competent doctor.

The Company ensures that staff receive regular and documented training on health and safety, as well as adequate protective equipment. In addition, the Company has established work procedures to prevent, identify, reduce and address any risks to staff. The Company keeps adequate records of all incidents, also for the purpose of continuous improvement.

Filmop International s.r.l. guarantees clean toilets, access to drinking water and suitable places for eating meals for all staff, where appropriate.

### 2.4. Freedom of association and the right to collective bargaining

Filmop International guarantees the right of all staff to form and join trade unions of their choice and the right to collective bargaining.

The company guarantees, including through the provision of its facilities, freedom of association and the establishment of trade union representation; employee representatives are freely and democratically elected by the employees themselves. In addition, notice boards and free display areas are provided to facilitate communication.

Filmop International guarantees that trade union delegates, workers' representatives and all staff involved in organising workers are not subject to discrimination, harassment, intimidation or retaliation and that such representatives can communicate with their members in the workplace, as far as possible.

### 2.5. Discrimination

The Company considers all individuals to be equal and, as persons, to have the same rights.

Filmop International does not adopt or support discrimination based on race, social class, national origin, religion, physical condition or health, gender, sexual orientation, marital status, family responsibilities, trade union membership or political affiliation of any kind, in its relations with its staff and, in particular, in the following specific situations:

- employment,
- remuneration,
- access to training,
- promotion,
- dismissal, resignation or retirement.

The Company does not interfere with the exercise of employees' rights to follow principles and practices related to their race, sexual and social origin, religion, gender, sexual orientation, family responsibilities, union membership, political opinions, or other circumstances that may lead to discrimination.

Filmop International does not permit behaviour, including gestures, language or physical contact, that is sexually coercive, threatening, offensive or aimed at exploitation or psychological pressure.

### 2.6. Disciplinary practices

The Company applies the principle of respect for all staff and the dignity of each individual. It does not use or support the use of corporal punishment, mental or physical coercion, or verbal abuse. The Company refers to the provisions of the relevant national collective labour agreement and current legislation made available in the workplace, as well as the internal disciplinary code.

### 2.7. Working hours

The efficiency of an organisation also depends on the correct organisation of work and compliance with deadlines. The Company requires its employees and suppliers to be flexible and able to adapt to the company's needs.

The company complies with the working hours set out in current legislation and the applicable national collective labour agreement. In any case, staff are not required to work continuously for a period exceeding that permitted by the national collective labour agreement for the sector and must be given at least one day off after six working days. Filmop International s.r.l. guarantees that overtime is voluntary, does not exceed the limits set by the relevant national collective labour agreement, is only required in exceptional and short-term business circumstances, and is always paid at a higher hourly rate than the ordinary rate.

### 2.8. Remuneration

The right to a dignified life also includes fair remuneration that allows for more than just the satisfaction of basic needs.

Filmop International guarantees that the wages paid for regular work are not lower than the minimum wages for the sector.

The company ensures that the composition of wages and allowances is clearly and regularly indicated for the benefit of workers and that wages and allowances are paid in full compliance with applicable laws.

The Company also guarantees that no illegal employment agreements, "labour-only" contractual agreements, false apprenticeship programmes, or short-term employment contracts are entered into in order to circumvent legal obligations and avoid fulfilling the company's obligations towards its staff, in accordance with current labour and social security legislation.

### 2.9. SA 8000 management system

#### Social responsibility policy

Management defines a company policy, translated into the various languages corresponding to the nationalities of the staff, on social responsibility and working conditions in such a way as to ensure that:

- It includes the company's commitment to comply with all the requirements of the standard, all those otherwise subscribed to by the company, and those required by national laws;
- It is documented, communicated, displayed in a visible and clear manner, and is understandable to all staff;
- It is made available to interested parties upon request in an effective manner.
- It is shared with suppliers, customers and sub-suppliers.

#### Procedures and records

Filmop International maintains appropriate records to demonstrate compliance with the requirements of this Code of Ethics.

The SA 8000 management system documentation consists of the following documents:

1. Code of Ethics.
2. Procedures.
3. Instructions.
4. Records relating to activities carried out.

#### Management Review

The company periodically reviews, also in conjunction with other management reviews required by other company systems, the adequacy and continued effectiveness of its policy and procedures and any other guidelines that may have been issued, including through the assessment of objectives and company performance measurement systems.

#### Social Performance Team

Filmop International has set up an SPT comprising two worker representatives for SA8000, the Management System Manager, the RSPP (Prevention and Protection Service Manager), the RLS (Workers' Safety Representative) and the Human Resources Manager representing the company management, with the aim of monitoring and implementing SA8000.



SPT meets periodically to assess:

- Any risks of potential non-compliance with SA8000
- Propose actions to Senior Management to address these risks
- Trends in SA8000 indicators.

SPT uses the following in its risk analysis:

- Information in its possession
- Any questionnaires administered to workers
- Analysis of reports received regarding non-compliance with the SA8000 standard.

### **Monitoring**

The SPT is responsible for the monitoring, control and internal verification system for the application of SA8000. The SPT monitors the status of SA8000 application and the results of actions taken to improve such application through reports from workers, audits or workplace inspections. SPT has autonomy and authority as it is delegated for this purpose by Management, to which it reports periodically on the status of actions taken to improve the application of SA8000.

### **Internal involvement and communication**

Filmop International believes that only a complete and correct approach can be achieved by involving all interested parties in its Code of Ethics.

For this reason, it pays particular attention to informing and training its staff.

It also makes this Code, a symbol of its commitment, available to all interested parties.

For this reason, specific training is provided on the Social Responsibility System.

It is committed to providing visibility on the status of the Social Responsibility system by communicating the results of monitoring and compliance with requirements, not only internally but also to all other stakeholders (such as suppliers, customers, etc.). The forms of communication are defined on a case-by-case basis according to specific needs.

### **Complaint management**

All interested parties, including workers, may submit reports, including complaints, concerning the workplace or non-compliance with the SA8000 standard. The company guarantees that reports may also be submitted anonymously and that they will not result in discrimination against those who submit them.

The company ensures that the results of the closure of complaints are communicated to staff in order to demonstrate its commitment to compliance with the standard.

### **Access for verification**

The Company is willing to grant access to interested parties and to its customers, when specified in the contract, to its premises for verification purposes.

### **Corrective and preventive actions**

Through the SPT, Filmop International addresses any potential and actual issues regarding this Code of Ethics raised by any stakeholder. Depending on the seriousness of the case, the company representative evaluates the possible involvement of other company bodies.

The company implements corrective actions and allocates resources appropriate to the nature and severity of each non-compliance with company policy and the requirements of this Code of Ethics. SPT keeps records of the actions taken: timeline, list, causes and results achieved.

### **Training and skills development**

Filmop International ensures adequate periodic training so that SA 8000 issues are learned and the system is applied, also evaluating the effectiveness of the training itself.

### **Supplier and contractor management**

The assessment and management of suppliers and sub-suppliers is also based on their ability to meet the requirements of SA 8000. This assessment includes, for example: raising awareness of the standard, signing a declaration of commitment to the social responsibility system and the requirements of SA 8000, any further investigation through on-site inspections, and monitoring over time.



Where possible, subcontractors are also involved in this process.

Furthermore, based on direct interviews, questionnaires, awareness-raising initiatives and on-site visits, the company assesses the areas of risk for each supplier and proposes, where reasonable, actions to be taken to comply with SA8000 standards.

Supplier monitoring activities regarding the progress of the actions proposed to address the identified risks are set out in the Management Review.

### 3. Conduct rules

The Code of Ethics is a set of rules of conduct intended for various categories of stakeholders.

Filmop International has identified the recipients of this Code of Ethics in the following categories of stakeholders:

1. Employees and Collaborators
2. Suppliers
3. Customers
4. Partners
5. Reference community

#### 3.1. Employees and Collaborators

##### **Compliance with rules**

All employees are required to comply not only with the rules of conduct contained in this Code of Ethics, but also with all company rules, regulations and procedures that are made known and disseminated, in order to ensure that company life is conducted in a regular and orderly manner, in accordance with defined and shared company processes.

##### **Child labour**

All workers are required to report any information they may have regarding cases of child labour at the company's suppliers or subcontractors to the company management.

##### **Health and safety in the workplace**

In order to protect the health and safety of workers, all workers are required to:

- Comply with and scrupulously follow all safety procedures in the performance of their work.
- Wear Personal Protective Equipment in the manner specified in the procedures themselves
- Do not smoke outside the areas permitted and made available by the company.
- Report any information that could prevent the occurrence of an event harmful to workers' health to the Head of the Prevention and Protection Service.

##### **Discrimination**

Employees are required to refrain from discriminatory practices of any kind towards their colleagues or new recruits. Relationships between individuals must be based on the principles of mutual respect and human dignity.

##### **Drug and alcohol abuse**

All staff are required to comply with applicable laws and regulations regarding the possession or use of alcohol or drugs. The Company prohibits the illegal use, sale, purchase, transfer, possession or presence of drugs and alcoholic beverages in the workplace.

##### **Protection of the Company's tangible and intangible assets**

The company's assets consist of tangible physical assets, such as work equipment, computers, vehicles, etc., and intangible assets, such as knowledge, know-how and confidential information. The protection and preservation of these assets and information is fundamental to safeguarding the company's interests, and it is the responsibility of staff (in the performance of their duties) not only to protect these assets and information, but also to prevent their fraudulent or improper use.

### Behaviour to adopt in premises and workplaces

All employees and collaborators are required to:

- Provide truthful and accurate information about their professional experience.
- Carry out their work with the utmost professionalism and seriousness.
- Always work with the aim of stimulating learning and knowledge.
- Be open to continuous updating and improvement of their professional skills, maintaining and enhancing them.
- Refrain from any form of discrimination against customers, suppliers and colleagues, and from creating situations of ambiguity with them.

### 3.2. Suppliers and subcontractors

All direct and indirect suppliers, both in-line and cross-functional, must undertake to:

- Comply with the commitments made to the company in terms of punctuality and quality of the products and services provided.
- Establish supply relationships with companies that also guarantee compliance with the requirements of the SA8000 standard (they do not need to be certified), compliance with applicable environmental regulations and compliance with the laws and technical and sector regulations applicable to the products and services provided, given that Filmop International has certified Business Management Systems (SA8000, ISO 9001, ISO 14001 and other similar standards in the social and governance sphere).

Direct and indirect suppliers, both in-line and cross-functional, must undertake to:

- Comply with all product, environmental and safety regulations;
- Comply with the rules of professional conduct and bargaining in the field of work and labour law;
- Formally commit to complying with the rules of conduct;
- Complete the information questionnaire, where requested;
- Agree to undergo any inspections carried out by the company.
- Provide documentation that guarantees the linear and cross-functional chain of ethical correctness in the field of personnel management.

In order to verify compliance with the selection and evaluation criteria for critical suppliers, the company reserves the right to carry out checks on the conditions in which its suppliers operate.

### 3.3. Customers

Filmop International does not favour or discriminate arbitrarily against its customers; it adopts a policy of actively listening to its customers, not only by responding to any formal or informal communications, but also by promoting forums aimed at gathering and exchanging information, observations and suggestions.

All communications from users are considered valuable and, as such, are respected in the full exercise of freedom of expression and protected in accordance with current privacy regulations.

### 3.4. Partners

The partnership initiatives are based on sharing the principles of social responsibility promoted by Filmop International and are characterised by reciprocity in the exchange of information and any benefits, whether economic or non-economic.

### 3.5. Reference community

The reference community consists of institutions, associations, collective bodies or individuals who have relations with the company.

Filmop International may join or participate in initiatives promoted by the reference community, also collaborating through financial support.

In any case, sponsorship or promotion of events and activities is only carried out if it complies with the principles of social responsibility.

The company is committed to establishing open, clear and transparent relationships with all stakeholders in the community it serves, so as to avoid any form of discrimination and prevent conflicts of interest of a personal or corporate nature.

## 4. Implementation and control methods

### Head of the Social Responsibility Management System

The Head of the Social Responsibility Management System is responsible for the following tasks:

- Distributing the Code to Company employees, customers, suppliers and all third parties concerned;

- Managing, implementing, studying and verifying the regulations covered by the Code in order to adapt it to changes in the law;
- Verifying, monitoring and assessing cases of violation of written rules, taking appropriate measures in the event of infringements, in collaboration with Management, in compliance with laws, regulations and the applicable National Collective Labour Agreement;
- Promoting and preparing employee communication and training programmes aimed at improving knowledge of objectives and how to behave in order to achieve them.

### **Workers' Representative for Social Responsibility**

The Workers' Representative for Social Responsibility has the following duties:

- Identifying, including on the basis of reports from workers, any non-compliance with the procedures set out in the 'Code of Ethics' and the contents of the SA8000 standard, taking action to address such non-compliance and collaborating in the identification of corrective measures;
- Facilitating communication between workers and management regarding the application of current regulations, the procedures of the 'Code of Ethics' and the contents of the SA8000 standard;
- Participating in the review of the Social Responsibility Management System.

### **Social Performance Team (SPT).**

In order to implement all elements of SA8000, Filmop International has set up a Social Performance Team (SPT). The team includes a balanced representation of workers' representatives and management. However, responsibility for compliance with the Standard lies solely with the Management.

SPT periodically conducts written risk assessments to identify and prioritise areas of actual or potential non-compliance with the Standard.

SPT is also responsible for suggesting actions to management to address the identified risks, defining the order of priority based on the severity of the risks or the fact that a delay could make it impossible to resolve the problem.

SPT shall conduct these assessments based on the information in its possession and on information obtained through data collection techniques and meaningful consultation with stakeholders.

The SPT is responsible for effectively monitoring activities in the workplace to keep track of:

- Compliance with the Standard;
- The implementation of planned actions to address risks identified by the SPT;
- The effectiveness of the methods adopted to satisfy the organisation's policies and the requirements of the Standard.

Management grants the SPT the authority to gather information from stakeholders or involve them in monitoring activities. The SPT also collaborates with other areas of the organisation to examine, define, analyse and/or resolve any possible non-compliance with the SA8000 Standard.

SPT is responsible for facilitating periodic internal audits and preparing reports for management on the performance and benefits of actions taken to meet the requirements of the SA8000 Standard, including a record of identified corrective or preventive actions.

### **Reporting violations**


Anyone who becomes aware of situations that may appear to be non-compliant with the ethical values and rules of conduct set out in the Code is required to inform the Company's Management, or the Head of the Social Responsibility Management System, or the Workers' Representative for Social Responsibility, or anonymously through the appropriate complaint/reporting mechanism.

The company undertakes not to take any action whatsoever against anyone who has reported a violation.

The System Manager, in collaboration with Management, is responsible for assessing complaints/reports and, if necessary, taking appropriate action to resolve them.

Any actions taken by the company following reports/complaints received will be communicated through meetings and/or circulars and/or the dissemination of reports.

The report may be submitted anonymously or signed. In the case of anonymity, the response will be given publicly through the information tools available to the company (notice board, internal communication). If the reporter's details are provided, the response will be given directly to the person who signed the report.



# HOW TO REPORT VIOLATIONS OF THE CODE

In order for the code to be truly enforceable, all stakeholders, primarily workers, must have the opportunity to report any violations of its principles.

To this end, FILMOP INTERNATIONAL SRL offers various options:

- REPORTS (INCLUDING ANONYMOUS ONES<sup>1</sup>) TO BE PLACED IN THE APPROPRIATE 'BOXES' IN THE COMPANY
- DIRECT COMMUNICATION via DEDICATED e-mail ([etica@filmop.com](mailto:etica@filmop.com))
- REPORTING THROUGH THE CHANNEL ALREADY SET UP FOR WHISTLEBLOWING<sup>2</sup>

<sup>1</sup> *If the report is anonymous, the rules of whistleblowing remain valid, i.e. defamatory reports are not permitted. It should also be noted that investigations following anonymous reports may be less effective.*

<sup>2</sup> *Some reports may concern aspects that are important for both the Code of Ethics and Whistleblowing, so if in doubt, please use the channels that are most appropriate for you. The recipient of the communication will then forward the message to the most appropriate channel and the responsible parties.*