



Code of conduct
March 2023

Letter from the Board of Directors

Our mission

Here at Unox, we have acquired a Taste for Building Success around us: for our customers, for our business partners and suppliers, and for the whole Unox team. Building Success means setting ourselves short- and long-term goals, making all the relevant decisions, and taking whatever steps are necessary to achieve the set goals.

We believe that there is no one definition of success and that each individual determines their own: self-realization, creating a strong team, a wonderful family or great business, making your mark on history or achieving something for yourself, living your life freely or becoming an example for others. At UNOX, we provide the tools, support and ideas for anyone tackling their own personal challenge of Building Success.

Building Success is our mission.

Our code of conduct

The way we see it, success is a verb you don't conjugate in the future tense.

To create a sustainable future, we need to act ethically and with integrity today, guided at all times by our principles.

Today, we're proud to share the UNOX Code of Conduct with you.

This Code sets out the principles on which our every action is based.

Principles that guide us every day in our pursuit of social and environmental responsibility, and ethical conduct.

The Unox Group works around the globe and a significant contingent of our team lives and works outside our home country, Italy. We're proud to be one big family made up of people of different cultures, languages and backgrounds.

Diversity and inclusion have been core elements of our DNA for as long as we've been around.

We're well aware that our conduct has an impact on all communities we work in around the world, and we believe it's our responsibility to ensure they have all the tools they need to act ethically and with integrity. It's not always easy to grasp the possible impacts our actions may have. That's why it's so important to help our people with clear rules and guidelines, creating a work environment that incorporates the highest ethical standards of conduct.

The aim of the Code of Conduct is to ensure that all individuals working within the Unox Group act with the utmost integrity, adhering to the laws in force, building a better future for our Company and for the communities we operate in.

Responsibility for adherence to the Code rests with us all. Responsibility for reporting non-adherence rests with us all.

Thank you,

Enrico Franzolin Chiara Franzolin Nicola Michelin

The Board of Directors





UNOX®

Road to integrity

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1. Our principles and values

1.1 Fundamental principles

We look at the financial and environmental efficiency of our work processes as two sides of the same coin, pursuing a zero-waste policy and striving to minimize our environmental and social externalities. We recognize the central role of ethics in the running of our business, and we're committed to always pursuing our goals in full compliance with the relevant standards, and with the utmost respect for the bodies tasked with monitoring this compliance, as well as for our people, our customers, suppliers, competitors and, more generally, any other stakeholder.

In the implementation of these principles, especially when it comes to ethics in business, Unox requires all its directors, employees, contractors, and any other third party it has dealings with, to comply strictly with the guidelines contained in this Code of Conduct. The guidelines can be summed up and grouped into the following three key values:

Integrity

We hold ourselves to the highest standards of integrity, and expect everyone we deal with to do the same, in full compliance with all applicable standards.

Respect

We honour the commitments we've made and hold ourselves accountable for all our actions.

Commitment

We commit 100% to everything we do – our actions guided by our policy of continual improvement – encouraging others to do the same.



1.2 People Statement

The essence of Unox's corporate culture lies in our people statement. Each member of the Unox team is required to follow its guidelines. The following people statement describes the essence of Unox's corporate culture. We create the best working environment in which to build success for those who have shown talent and passion in their studies and for those who turn talent and passion into outstanding results every day.



We are results oriented

We are successful and our results attest to this. We look ahead and build solid plans, which we always follow through on. We look at the detail and understand that it's the details that make the difference. We tackle each problem we encounter and turn it into an opportunity. If we get things wrong, we don't hide behind excuses, we take responsibility for our mistakes, we determine the root causes and sort them out.



We are motivated every day

We prepare to tackle the challenges of today and tomorrow. We engage in training to grow both as people and as professionals. We know we are winners, and we work hard to be successful always. We are focused on our goals, and we find motivation in every clash of opinions. We love competition.



We are positive

We set ourselves ambitious goals because we know we can achieve them. We believe there is no obstacle we can't overcome. We know that the difficulties we overcome today will be our strengths tomorrow. We know that tomorrow we'll be a better team.



We are believe in initiative

We always strive to improve ourselves and improve everything around us. We are curious. When we find that something works, we share it to turn it into best practice. We try and try again in order to turn our ideas into results. We don't stand back and watch things happen around us, we make them happen.



We work as a team

We're a team that plays to win every day. We take the field prepared and united. We know that there's no success unless we work together. Each of us makes a contribution, bringing our individual talents and determination. We help anyone who needs it and support anyone who wants to improve.



We are scientific

We believe that building a successful business is a science and a passion. We design, produce and measure our processes and projects in minute detail. We see cooking as a chemical and physical reaction activated by heat and governed by the laws of heat exchange. We build equipment that controls this reaction. We don't leave anything to chance.





We believe that feedback is the single most important tool for growth

Diamo feedback nell'interesse della persona che lo riceve. Il feedback ci aiuta ad esplicitare quali sono i comportamenti da sostenere e quali sono quelli che devono essere cambiati. Il feedback ci permette di evitare incomprensioni e le loro conseguenze. Ci adoperiamo affinché le persone si scambino continuamente feedback professionali e costruttivi, attraverso tutta l'organizzazione. Chi entra nel nostro team potrebbe non essere pronto a tanta franchezza, insegniamo quindi a tutti come si dà e come si riceve il feedback. Ci sosteniamo a vicenda per diventare modelli di riferimento per gli altri.



We believe that leading by example is a leadership model

The role of a leader is to provide a framework through their own actions and to be aware of what goes on. A Unox leader doesn't ask a colleague to do anything they wouldn't do themselves. Each leader is given the freedom to manage and organize their activities and their agenda as they see fit, setting an example to others. None of our leaders has an assistant. At Unox, nobody brings someone else coffee, unless it's out of kindness.



We believe in the value of time

We have to make quick decisions without leaving people waiting needlessly. A leader responds to the Unox team's requests in as short a time as possible, and certainly within two days; failing that, the team can, and indeed is expected, to decide for themselves on the best course of action for Unox. Every project has an Owner who is responsible for speeding up the SCAN-PLAN-DO-CHECK-ACT cycle as much as possible. We close all the projects we start, and the people we deal with always receive a clear and honest response to their requests.



We believe in the convergence of choices as a key to success

Decisions have to be quick and informed. The person responsible for making the decision must receive, understand and take into consideration everybody's opinions, even though they might not share them. When a decision is made, we expect everyone to help bring about whatever was decided. We are all required to show that we know we're not infallible and that we know how to accept any feedback where the decisions made have not produced the desired outcome.



We believe in the power of disagreement to stimulate creativity

We value people capable of being brutally honest, especially towards UNOX leaders. This is why we expect everyone to express their disagreement freely. Divergence of opinion allows us to extend the range of possible solutions and ideas. Each decision made by our leaders must be an informed decision; not saying you disagree where you have solid arguments to support your case is not productive and doesn't help UNOX achieve its goals.



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best of



2. Caring for our people

2.1 Promoting a fair and inclusive work environment

Our people are the single most important resource for the Group's growth.

Their combined wealth of knowledge, experience and skills must be harnessed and built on, thus contributing to the Company's own growth.

The Unox Group is committed to ensuring a fair, productive and non-discriminatory work environment in which everyone is judged based on their personal contribution.

We can only achieve this goal if everyone commits to being respectful and professional in their dealings with co-workers, customers, suppliers and visitors alike.

Each of us endeavours to promote fairness and ensure an environment free of discrimination and harassment, in compliance with all applicable laws in force.

Everyone needs to work together to keep a work environment free of prejudice and discrimination, respecting the personality of each individual, producing an atmosphere within the company that fosters respect for the dignity of each person.

How is the Code applied?

One of my co-workers is always making chauvinistic remarks about one of the people on our team and shows no regard for her. His attitude creates an uncomfortable atmosphere at work and I find his behaviour embarrassing. Should this be allowed?

Your co-worker's behaviour not only jeopardizes outcomes, undermining the team spirit, it also violates the Company's ethical principles concerning the prevention of discrimination towards employees or any other person. You should bring the situation to the attention of your immediate superior, or to your manager's superior, or to the HR manager. Remember, too, that if you feel you are not being heard, you can always request a meeting with a member of the Board of Directors at any time.



2.2 Health and safety

The Unox Group is committed to protecting the health and safety of its people, taking every appropriate measure to remedy any condition that might endanger health and safety.

We comply strictly with safety regulations and standards, and make sure we identify and report any potential risks. Everyone is responsible for watching out for their own safety and that of their co-workers. We also ask independent contractors, suppliers and partners to comply with safety procedures while at our premises.

In our quest to keep all our people safe, we employ the best technologies available, while also taking into account their environmental impact, and complying with the strictest environmental safety requirements.

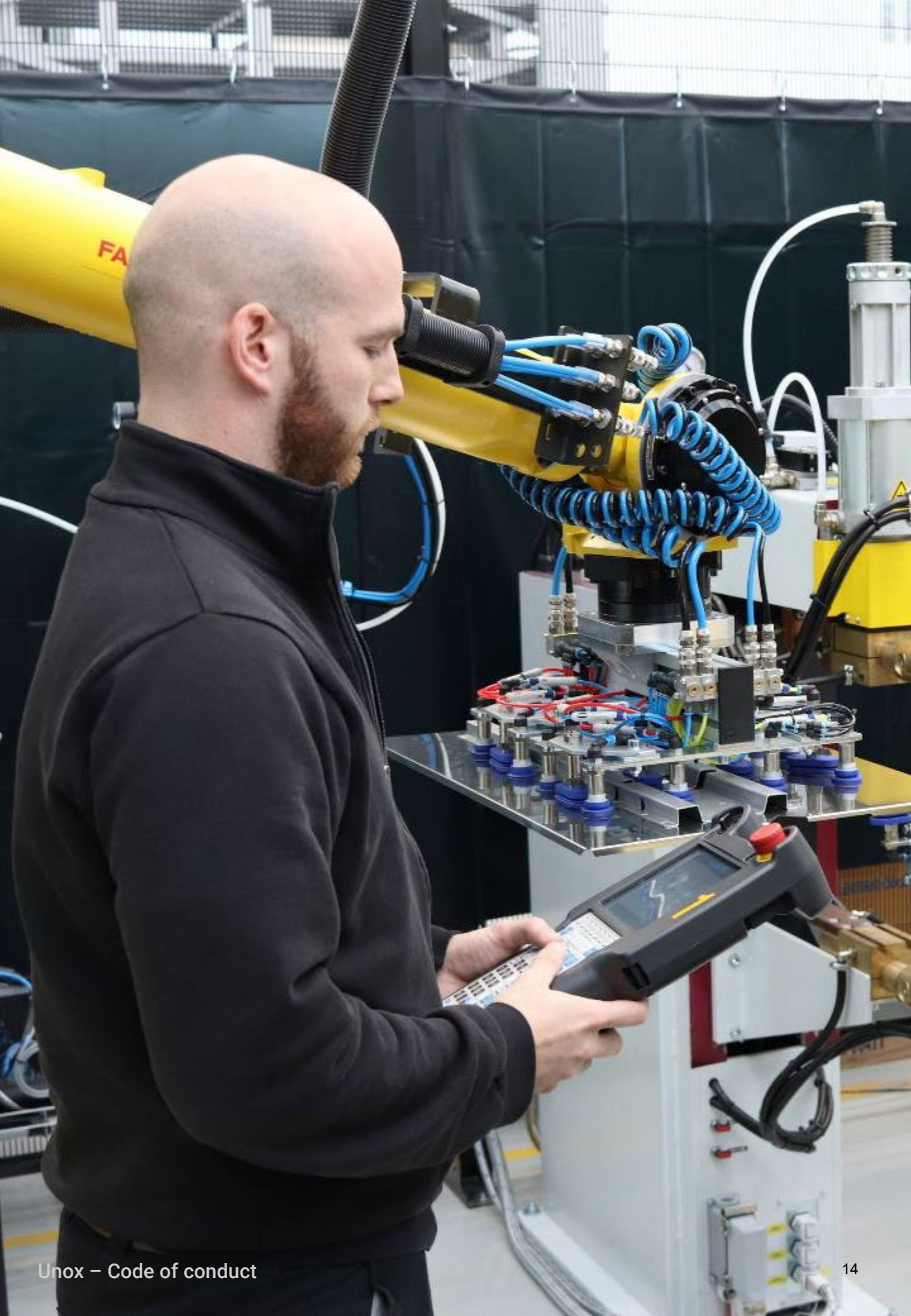
We work every day to ensure the Health, Safety and Wellbeing of our employees and the wider community:

- we give workers a voice through their health and safety representatives, while the relevant officers and OHS managers of the companies in the Group get together at regular intervals to share best practices and perspectives emerging from different contexts in order to best assess risks and opportunities for improvement;
- we recognize the hazards, we seek and invest in solutions to minimize the risks, as ever-evolving technical and financial opportunities permit;
- we ensure that company goals are shared and that everyone is aware of them;
- we encourage personnel motivation and accountability at every level through regular meetings where we go over the company's strategy and the goals achieved;
- we invest in people and in their wellbeing: we engage personnel in proposing improvements, we plan actions to try to bring their proposals to fruition, we monitor and check satisfaction, seeking new ideas for improvement. Since 2018, we have certified this process through Great Place To Work®;
- we create new work opportunities locally and around the globe;
- where possible, we support causes that concern the community.

How is the Code applied?

A person on my staff has told me about a potential safety risk for people with access to the warehouse. It doesn't seem like a serious issue. What should I do?

Every safety issue must be reported straight away to your relevant health and safety officer. The list of officers is defined on the health and safety organization chart. Alternatively, you can report the issue to the OHS manager, your superior, or the Board of Directors.



3. Ethics in business

3.1 Conducting business sustainably

3.1.1 Holding ourselves to the highest ethical standards with our customers

Customers and potential customers are always ensured the utmost clarity, collaboration and technical expertise at all times during our dealings with them.

When it comes to existing contracts, everyone contributes – within the extent of their respective roles – to providing the highest level of service and fully meeting customer expectations.

No person is allowed to accept requests for, offer, promise or provide – directly or indirectly – anything of value, including donations, fees, services, entertainment, favours or gifts that might be construed as exceeding standard business practice or acts of common courtesy, from or to any person in a position to influence the purchase process of the customer or potential customer, as a condition or result of concluding business with the Company.

How is the Code applied?

As we were preparing our quote, we realized that we do not meet one of the requirements of a technical nature. With the customer explicitly pushing us, and seeing the requirement as a minor one, we decided to submit our quote anyway, omitting to mention the shortcoming. Is this the right thing to do?

No, it's not right. Quotes submitted to customers must always be accurate and truthful in every way. For some types of customer, this kind of conduct may even constitute wrongdoing, which has direct consequences for the Company.



3.1 Conducting business sustainably

3.1.2 Product quality and safety

The Unox Group ensures the highest standards in terms of the quality and safety of the products offered, and is committed to the continual improvement of its processes.

Everyone is called on to contribute to the continual improvement process, which includes taking steps to collect any and all feedback from customers and share it internally.

To ensure the quality and safety of our products:

- we work closely with our Customers and stakeholders, endeavouring to understand their needs and thus set ever-higher standards of quality;
- we have adopted a vision to harness market opportunities;
- we invest in latest generation technologies; we set challenging goals to exceed Customer expectations.

Unox products are certified by independent third parties, according to international standards, and are approved for international distribution. This ensures that products meet the highest standards of electrical safety, electromagnetic compatibility, hygiene, cleanability, as well as energy efficiency.

We design our products, services and processes with the aim of overcoming the trade-off between Quality, Cost, and Turnaround times, while being Environmentally responsible (QCTE).

UNOX has been ISO9001 certified for its quality management systems.

All our products are tested before being placed on the market, both with safety testing and functional testing to check their quality and promptly identify any deviations from our standards. We also have a special process in place to bring about continual improvement in the supply chain outside the Group, in order to reduce any non-conformance in purchased parts.

How is the Code applied?

While handling certain matters of an administrative nature, one of our customers reported to me that they had found defects in our products. Because the customer added that they didn't think it merited asking for a credit note anyway, I left it at that, without seeking advice from anyone else. Was this the right thing to do?

From a strictly administrative standpoint, your actions would certainly be seen as correct in that there were no credit notes to issue. However, it wasn't the right thing to do in terms of further quality improvement requirements and goals: you should have reported your findings to the relevant person responsible, enabling them to conduct the appropriate checks and take corrective measures, if required.



3.1 Conducting business sustainably

3.1.3 Environment

Protecting the environment, especially contributing to a decarbonized economy through our Net-Zero EmiXion 2030 pathway, is one of Unox's main priorities.

The Unox Group is committed to constantly improving the environmental performance of its facilities, its processes and its products in compliance with the regulations in force. Unox doesn't stop at reducing the environmental impact of its facilities, instead we want to take things one step further, lowering the emissions of all our customers worldwide.

We invest in the search for increasingly innovative technological solutions that can deliver improved cooking process efficiency and real improvement on the energy consumption front.

We advise our customers of the environmental impact of our products during service, allowing them to make decisions that reduce, or eliminate altogether, their impact in terms of CO2 emissions.

This is what sets us apart and today makes us the company producing the highest number of ENERGY STAR® certified professional ovens in the world.

We invest in our Net-Zero E-MIXION 2030 programme for the company's Sustainable Environmental growth:

- we reduce the Customer's energy consumption by continually improving product performance;
- we encourage the use of recyclable materials and packaging;
- we are forever working to reduce the environmental impact of our production processes and our facilities;
- through a lean economy policy, we eliminate waste, reducing environmental impacts;
- we encourage sustainable mobility by purchasing electric cars and installing charging points;
- we support renewable energy, installing photovoltaic systems where possible;
- we encourage our people to adopt green practices and, through our products' technology, we also foster sustainable behaviour among our Customers.

UNOX is ISO14001 certified for its environmental sustainability.

How is the Code applied?

As I was leaving the office, I smelled gas around the meter and I heard a strange noise coming from a metal enclosure in front of the offices. What should I do in a case like this?

You have to report it to Facility management without delay as there may be an emissions-related risk to the environment, as well as a risk to employee safety.



net zero
e-miXion
2030

3.1 Conducting business sustainably

3.1.4 Suppliers and partners

The Unox Group has always focused heavily on the sustainability of its production supply chain.

The decision not to outsource or delocalize production has resulted in positive effects from both an environmental and social point of view:

- from an environmental point of view, creating companies engaged in the manufacture of most components required to make our ovens located just a few kilometres from our Cadoneghe site where assembly takes place has allowed us to drastically reduce the carbon footprint generated by inbound logistics;
- from a social point of view, Unox has generated a positive effect on local communities by creating numerous jobs in the region.

When selecting external suppliers for raw materials and components, we've always endeavoured, wherever possible, to opt for suppliers located nearby, and Italian companies, in order to reduce the inbound logistics carbon footprint.

Unox expects all its suppliers to respect the Company's values and ethical principles.

In specific cases where it is deemed important, suppliers are required to explicitly accept the commitment to complying with the principles contained in this Code – which may involve adding an explicit termination clause – and thus effectively operate in line with the terms hereof.

To this end, the appendix to the contract "Code of Conduct - Suppliers and Third Parties", based on this Code of Conduct, is formally shared with the supplier and signed thereby.

In selecting and managing contractors and suppliers in general, we must always endeavour – fairly and with as comprehensive as possible documentary evidence – to make decisions in the Company's best interests, respecting the values and ethical principles outlined in this Code.

How is the Code applied?

While visiting one of our suppliers, I noted that employee working conditions did not match up with what the supplier told us during the selection process, and are not in line with our supplier Code of Conduct. Is that right?

This sort of practice is not in line with our Code of Ethics and our Code of Conduct - Suppliers and third parties and, depending on the situation, might constitute wrongdoing. You need to bring what you witnessed at the supplier's premises to the attention of your immediate superior or directly to the Board of Directors.



3. Ethics in business

3.2 Promoting lawful conduct

3.2.1 Adherence to laws

The Unox Group is committed to acting in full compliance with the laws in force, including anti-money laundering and exporting laws.

The Unox Group, including its subsidiaries, and all the people making up the Group, wherever they are based, are required to adhere to the above-mentioned laws, with regard to all activities or business that said companies or people conduct on behalf of the Group.

We prohibit money laundering or any activity that facilitates money laundering or the financing of terrorist activities or other criminal activities.

We observe all anti-money laundering laws and regulations in force.

We are committed to acting in full compliance with legal provisions and rules and regulations concerning export control and customs activities. In some cases, said laws might prevent us from doing business in certain countries, or require us to meet certain requirements or obtain permits before the goods or technology can be exported or sold.

All contractors, suppliers and third parties that we have professional dealings with are also required to comply with the above-mentioned laws, with regard to all activities or business that said companies or people conduct on behalf of the Unox Group.

How is the Code applied?

I've become aware of conduct by a co-worker that's potentially non-compliant with the exporting laws in force. How should I proceed?

The conduct that you witnessed might constitute wrongdoing and must be brought to the attention of your immediate superior or directly to the Board of Directors.



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3.2 Promoting lawful conduct

3.2.2 Fair competition

As a rule, it is prohibited to fix prices or split the market between competing companies.

We must act absolutely fairly towards competitors, without ever resorting to unfair practices or conduct that could damage their image or reputation, or doing anything to violate their intellectual property rights.

The Unox Group prohibits the adoption of anti-competitive practices, recognizing the fundamental importance of a free and competitive market.

Non-observance of said laws can have serious legal consequences: companies breaching free competition rules risk heavy fines, while the individuals responsible for the breaches can receive severe punishments, including prison time at the top of end of the scale.

Violations of this principle can result in disciplinary sanctions, including dismissal.

In addition, adherence to competition laws is vitally important to the Group's reputation.

When dealing with the competition, it's very easy to give away corporate know-how by mistake.

The guidelines you are advised to follow are:

- Keep conversations with the competition to a minimum;
- In the event you spend time with personal friends who work for the competition, steer away from discussing work matters.

Here at Unox, we don't speak ill of the competition.

How is the Code applied?

One of our competitors, who one of my friends has been working for recently, plans to bid for a contract offered by one of our customers. Can I discuss the tender with him?

As a general rule, you need to be very careful discussing anything to do with competitors' prices. Whatever the case, it's always best to avoid talking about technical and/or financial opportunities and bids, both in a professional setting and outside the workplace.



3.2 Promoting lawful conduct

3.2.3 Anti-corruption

It is prohibited to offer, either directly or indirectly, or accept requests for sums of money or any other benefit to or from any individual, public official or private counterpart, for the purpose of inducing them to perform or not perform any action that falls under their responsibility.

Using third parties to offer or obtain sums of money or any other benefit for the purpose of corruption is similarly prohibited.

How is the Code applied?

I know that the Company doesn't allow gifts to be made to customers or potential customers, but I was still wondering if I can offer a gift paid out of my own pocket as a thank you for the help I received in winning a contract?

This conduct, in addition to breaching company values and our own corruption prevention principles, constitutes wrongdoing that can result in sanctions, imposed both on the person committing the crime and on the Company.

During the course of a visit from a certifying body auditor, in preparation for an audit that his body will be conducting on our company, my co-worker proposed offering him and his family a one-week sightseeing tour. Can I accept this request?

No. Anything of value offered in exchange for the opportunity to produce a benefit for the Company in terms of obtaining/maintaining certain certifications, can be considered a bribe.



4. Dealings with outside parties

4.1 Avoiding conflict of interest

Every decision must be made objectively and always informed by what is in Unox's best interests and how best to serve its needs, and not by personal interests or relationships.

Avoiding conflicts of interest means avoiding situations where there is an actual or seeming conflict with Unox's interests or reputation.

Whatever the case, any situation that interferes or may interfere with the impartiality of our judgement must be reported beforehand and in writing to your superior.

How is the Code applied?

My husband's company will be submitting a bid for a contract with Unox, but it's for a job in another office with another colleague where I have no decision-making power or influence over the decision. Do I need to advise my superior of the situation?

Yes. Even if you have no direct control over the outcome of the offer, the fact that your husband has dealings with the Company might give the impression that there is a conflict of interest.



4.2 Dealings with government bodies

Dealings with any government official or representative are handled only by authorized persons within Unox.

The utmost clarity and accuracy is required in dealings with any government official or representative – especially when it comes to preparing any documentation and/or information to be submitted to government bodies – so that there is no chance of misinterpretation.

You are required to collaborate fully at all times with authorities tasked with carrying out investigations into the Company, turning over all the information or documents requested without delay.

How is the Code applied?

Who should handle dealings with a public body (e.g. local health authority, inland revenue, occupational health and safety agency etc.)?

Roles and responsibilities within the Company determine who is required to handle such dealings, based on which public body is dealing with Unox. If you do not know or are unsure who this is, ask your superior, before handling any dealings with a government official inappropriately.



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VISITATORE

UNOX 30/04/2022
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Comune di Cadeneglia
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4.3 Supporting the communities we operate in

We appreciate we have a fundamental role to play in supporting the communities in which we operate worldwide.

We believe it's our duty to invest in social programmes, supporting them with funding and encouraging our employees to do voluntary work.

Unox is committed to supporting communities with donations and projects of an educational and social nature.

We're convinced that the sustainable growth of the communities we live and operate in is key to ensuring the wellbeing and sustainable growth of us all. The Unox Group's social initiatives must be guided by the relevant local management, always carefully assessing the projects to be supported.

All associations, foundations and non-profit entities in general that Unox collaborates with for social projects are required to comply with this Code of Conduct and local rules and regulations.

How is the Code applied?

I've learned about the opportunity to take part in a charitable initiative in the community that is home to the Unox branch that I work for. How should I proceed?

Initiatives of a social nature set up in the individual communities Unox operates in should be carefully assessed by the relevant local management, in order to determine what support actions will have a real impact. Put the initiative to the local management, who will analyse and assess the project in detail.



5. Handling our resources and information

5.1 Protecting our assets

Each individual is responsible for the correct use of the Company assets assigned to them for the purpose of company business and for protecting said assets from loss, damage and misuse.

Each person is required to protect Unox's technical and business information, ensuring appropriate protection measures are in place.

Unox personnel using company assets must look after them very carefully; never leave company computer equipment unattended, and make every effort to ensure its proper safekeeping.

While using company assets, Unox personnel are required to comply with all laws in force (e.g. the Highway Code) in line with the relevant directions for use and any applicable licences, while also refraining from any conduct that might damage the company's image.

How is the Code applied?

I've noticed a co-worker removing office supplies and taking them home. When I asked for an explanation, he replied: "It's no big deal, the company won't even notice." What should I do?

Report the matter to your superior. All employees are required to report stealing or other conduct in breach of our Code.



5.2 Protecting personal data and company information

Any company information that's not in the public domain must be protected, even where there are no explicit Instructions to keep the information confidential.

Company know-how is crucially important to Unox, being an essential part of the company's assets on which our success depends. Our ability to innovate is actually what sets us apart in the market.

Unox expects, and it is absolutely essential, that everyone maintains the utmost secrecy about every element of company know-how.

The term company know-how refers not just to anything covered by specific patents, but also extends to technical Drawings or even just ideas that the research teams are working on.

Unox personnel using computer equipment are required to look after it extremely carefully and ensure that the data it contains cannot be accessed by third parties.

While on company premises, you must block access to your company PC, tablet, smartphone and/or mobile phone when you leave your workstation.

Everyone must commit to protecting the personal data and company information that they access in the course of their duties, adhering strictly to the procedures adopted and also meeting the requirements of the relevant standards.

As a rule, you're required to protect personal data and comply with the company's privacy policy.

How is the Code applied?

A friend who doesn't work for our Company asked me for the email addresses of my co-workers and customers, for his own business use. Can I send him a list of addresses?

No, this type of conduct not only deviates from the principles of this Code, it could result in sanctions being imposed on the Company.



5.3 Ensuring financial information is accurate

All Unox's books, registers and accounts must accurately reflect the nature of the operations performed in order to compile and publish accurate and complete data to give a clear, truthful and correct picture of the Company's financial results, assets and liabilities, and its financial state.

No conduct or omission is permitted that might jeopardize the correct, complete and timely recording and registration of company transactions.

We ensure the utmost transparency in our dealings with all people, in all the Group's branches, regularly sharing company results and business performance.

These confidential data and information regarding company performance must not be shared in any way with anybody outside Unox.

How is the Code applied?

Having met his sales targets for the year, one of my co-workers told me to hold off on the invoice so that it would be issued and charged the following year. Am I right in saying that I'm required to abide by his request?

No. All sales must be registered in the same period they were made. If you think they haven't been registered in the correct period, document and report the incident.





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