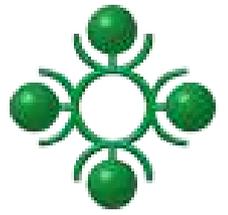


SINERGIA



# CODE of ETHICS

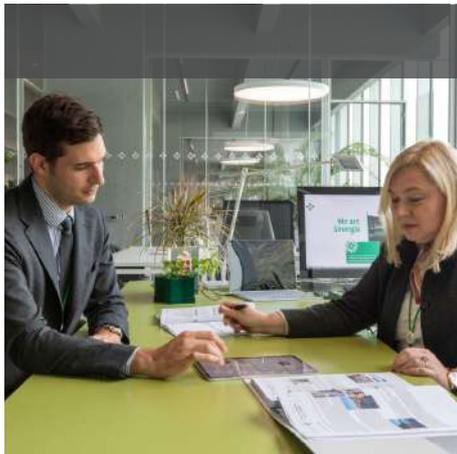


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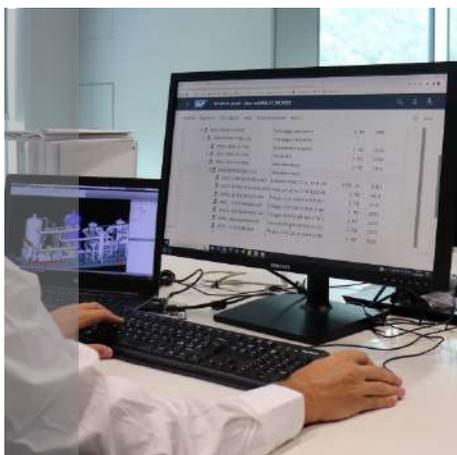
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# 1. INTRODUCTION

## 1.1 Purpose and field of application of the Code

To operate profitably in an increasingly large and globalized market, it is essential to benefit from an excellent reputation towards all Stakeholders, guaranteeing the adoption of transparent, ethical and compliant behavior.

With this Code of Ethics, adopted since 01/08/2017, we want to formalize **the behaviors already held and valued in our Company**, in compliance with shared principles and values, applicable laws, best practices and the diversity of the countries in which Sinergia works.

What is set out in this **Code of Ethics has a key role** in all the markets in which Sinergia operates and for this reason all those who encounter the Company must respect and make their own the provisions contained therein, thus making a fundamental **contribution to building and preserving the trust that customers, suppliers, third parties and the community** place in Sinergia.

The Code of Ethics is an integral, substantial and essential part of the contractual obligations of all Recipients. For this reason, everyone must receive a copy of it and in general it must be made available to everyone.

**The behavior of all Recipients must be in line with what is contained in the Code of Ethics.**

## 1.2 Definitions

To facilitate the understanding of this Code of Ethics, note the following definitions:

<b>Collaborators</b>	All employees, without distinction of gender, who carry out tasks on behalf of Sinergia.
<b>Managers</b>	All figures, without distinction of gender, responsible for managing a department.
<b>Recipients</b>	The recipients of the Code of Ethics, namely all employees, external collaborators ( <i>consultants, intermediaries, partners in business relationships, agents, etc.</i> ), Suppliers, Contractors, Customers and all other subjects who at various title and level encounter Sinergia or act in the name and on behalf of it.



<b>Management</b>	The ownership of Sinergia ( <i>Norma Scandella e Maria Balduzzi</i> ).
<b>Public Administration</b>	Officials of any local, national or foreign public office or body, of international public organizations ( <i>e.g. International Patent Office, European Investment Bank, European Commission, etc.</i> ), political parties and party leaders, candidates for public offices, managers and employees of state-owned, state participation or publicly managed companies or any other similar organization, as well as anyone acting in the name and on behalf of the Public Administration and any person who holds legislative, administrative or judicial positions.
<b>Company</b>	Sinergia S.p.A. ( <i>hereinafter also Sinergia</i> )
<b>Stakeholder</b>	anyone who is involved or has an interest in Sinergia, such as employee, investor, shareholder, customer, supplier, community, etc.
<b>Third parties</b>	agents, intermediaries, partners, consultants ( <i>both natural and legal persons</i> ), customers, suppliers and other representatives who interact with Sinergia

### 1.3 Information

For any doubts on the principles or implementation of the Code of Ethics, the Legal Office and the Human Resources Office are available to all Recipients.

#### ▾ PRACTICALLY

- If a Company procedure or information is not clear to you, ask for explanations.

## 2. GUIDING VALUES

Our values constitute the shared heritage and identity of the Sinergia culture and represent the reference point by which we inspire our conduct.

### ENTHUSIASM

At Sinergia, we face every challenge with balance and peacefulness, infusing positivity and motivation in ourselves and others. We celebrate successes by rewarding each other and, with humor, acknowledge our mistakes to learn from them. Even in tense moments, we promote positivity and smiles, contributing to a serene environment. We accept defeats gracefully and celebrate victories without arrogance. We engage our collaborators by transmitting passion and energy, approaching every situation with positive imagination and proactivity.

### CREATIVITY

Creativity at Sinergia is expressed through curiosity and the constant pursuit of knowledge. We make updates and research a method of work, analyzing problems from different perspectives and seeking alternative solutions. We go beyond the limits of habit and routine, anticipate changes, and promote innovative solutions with courage. We turn ideas into actions, viewing problems as opportunities and changing things without violating their essence.

### COURAGE

Courage is a fundamental value for us, expressed through the initiative we take to add value to Sinergia and its customers. We do not just follow procedures, but we actively seek new solutions, even if they involve risks. We express our critical thinking constructively and collaboratively, facing necessary confrontations. We take responsibility for our decisions and actions, both in successes and in mistakes.

### LISTENING

At Sinergia, listening is demonstrated through genuine interest in the speaker's message, respecting their communication timing and rhythms. We know when to be silent, remove filters and prejudices, and ask questions to better understand. We strive to correctly interpret situations and emotions, adapting our behaviors to the stimuli received.

# HUMILITY

For us, humility means being aware of our abilities and potential, accepting suggestions and criticism as opportunities for growth. We collaborate with colleagues regardless of roles and are quick to correct mistakes. We are open to exchanging ideas and willing to ask for help when needed.

# RESPECT

Respect at Sinergia is expressed through courtesy and good manners towards everyone. We justify our “no’s” and interact with everyone without prejudice, embracing diversity as a learning opportunity. We treat others as we wish to be treated.

# HONESTY

Honesty is the foundation of our actions, acting with integrity, responsibility, and transparency, prioritizing common interests over individual ones. We communicate sincerely and directly, keeping our commitments and respecting company procedures.

# TENACITY

We demonstrate tenacity by not getting discouraged in the face of difficulties, learning from mistakes, and aiming for continuous improvement. We persevere in achieving results, even if they require more time and effort than expected, and we pursue goals with flexibility, without becoming rigid in our positions.

# CO-RESPONSIBILITY

At Sinergia, co-responsibility is shown by striving for the best results, respecting both our own objectives and those of our colleagues. Our goals should not hinder those of others, and our colleagues’ problems are also ours. We seek added value in collaboration with other departments, not in competition with them.

# BELONGING

We feel a strong sense of belonging to Sinergia, identifying with the motto “WE ARE SINERGIA,” which characterizes all our communications. We are proud to be recognized as part of this great family.



## 3. GENERAL RULES and RULES of BEHAVIOUR



### 3.1 Legality and integrity

For Sinergia **the compliance with the laws and regulations** in force in the countries in which it operates is essential. It believes that lawful and honest behavior is the foundation for lasting success, built on the trust of customers, investors, colleagues and communities.

All Collaborators, and in general all Recipients, must comply with these principles as Sinergia does not maintain relationships with those who do not share and implement them. Therefore, each Recipient has a fundamental role in knowing and respecting the laws in force which constitute the binding framework of Company activities at an international level.

In no case can the pursuit of the Company's interests or the obtaining of an advantage for the same justify a conduct that is illicit or contrary to the principles of correctness, good faith, honesty and legality and to the principles indicated in this Code of Ethics.

It is also important to remember that, in many cases, even the mere apparent violation of the law can be sufficient to negatively influence the attitude of the Stakeholders.

#### ▼ PRACTICALLY

- Act in compliance with all applicable rules and laws in the countries in which you operate.
- Always respect regulatory provisions, even when they do not seem convenient.
- In the event of a violation, remember that ignorance of the laws in force is never a valid justification.
- It is your responsibility to seek assistance in verifying that your actions comply with the law. If in doubt, refer to your Manager or contact the Legal Department.

### 3.2 Transparency

**Clear, complete, timely and truthful information must be guaranteed in all relationships** (*work, commercial, institutional, etc.*) held with Sinergia or on its behalf.

Sinergia cooperates actively and without reservations with all the Authorities with which it maintains relationships of any nature and expects the same from each Recipient.

The dissemination of false information is strictly prohibited.

Sinergia guarantees the truthfulness of its communications and the transparency of the conducted activities, without violating the confidentiality obligations required by Company management rules.

#### ▼ PRACTICALLY

- Do not say or imply that you represent Sinergia if you are not actually authorized or if your specific function does not require it.
- Always work in a transparent manner, following the procedures and instructions provided by Sinergia.
- Do not disclose confidential or false information.

### 3.3

## Conflict of interest

The following are considered as conflict of interest:

- pursuance of personal or third-party interests other than those of Sinergia;
- absence or lack of independence and objectivity of judgment due to activities carried out by the person who operates and takes decisions on behalf of the Company;
- possibility of obtaining personal benefits from business opportunities of Sinergia.

**It is necessary for Sinergia to be aware of any situation that could generate a conflict of interest** between a personal activity and the role of the Collaborator and, in general, of the Recipients. The decisions must be taken following objective criteria and in the exclusive interest of Sinergia without being influenced by private factors.

### ▼ PRACTICALLY

- If you know or find yourself in situations that could generate a conflict of interest, inform your Manager or Management.
- While awaiting a decision on the reported conflict of interest, avoid taking part in activities or decisions that generate or influence it.

### 3.4

## Fair competition

Sinergia is aware that a healthy and correct competition system contributes to continuous improvement and development. For this reason, it observes the current competition regulations, collaborates with the market regulatory authorities and refrains from engaging in conduct that could constitute forms of unfair competition.

**No Recipient must be involved in initiatives or contacts with competitors aimed at unfairly impacting the market.**

### ▼ PRACTICALLY

- Always inform yourself (also through the Legal Department) about the regulations in force in the sector regarding antitrust and comply with them.
- Avoid any type of activity aimed at seeking illicit agreements for price control, for the territorial division of the market, or other actions aimed at creating conditions of illicit advantage or distorting the rules that govern the free market.

### 3.5

## Sustainability

Sinergia is aware that the term “sustainability” includes multiple and different aspects; not only environmental, but also economic, ethical, social, etc. For this reason, **Sinergia intends to actively pursue and make its own the objectives set by the Paris Agreement (COP21) and the UNO Agenda of 2030**, also through the design and development of corporate strategies inspired by them, creating shared values that allow a path of growth and continuous improvement to the Company and to anyone who encounters it. Therefore, the Company requires that all its Collaborators and, more generally, the Recipients actively contribute to the achievement of the aforementioned objectives.

### ▼ PRACTICALLY

- Actively participate in the activities proposed by Sinergia to deepen or achieve the objectives of the UNO Agenda of 2030.
- Even at home you can decide to follow the objectives proposed by the UNO Agenda of 2030, possibly adopting the suggestions you find here: <https://www.un.org/sustainabledevelopment/fr/takeaction/>

## 4. PEOPLE

3 GOOD HEALTH AND WELL-BEING



5 GENDER EQUALITY



8 DECENT WORK AND ECONOMIC GROWTH



10 REDUCED INEQUALITIES



### 4.1 Working conditions

Sinergia is aware that its most important assets are its human resources and acts by treating them with dignity and respect.

For no reason does it use child, forced or compulsory labor, implementing working time management in compliance with current legislation. It recognizes and respects the right to work, freedom of association and the right to collective negotiation and provides fair compensation and benefits in accordance with the applicable law. It does not allow disciplinary practices other than those required by law, nor does it tolerate corporal punishment, physical or mental coercion or abuse of any kind.

**Sinergia does not tolerate any form of discrimination, guarantees all Collaborators a healthy and safe working environment and does business while respecting the environment and in a responsible manner.** Sinergia seeks the same values in its Stakeholders.

#### ▼ PRACTICALLY

- Actively contribute to creating a work environment that complies with the above-mentioned principles and collaborate in its maintenance.
- If you are a Manager, be a model for your Collaborators; adopt ethical conduct and ensure that your Collaborators know the ethical and legal implications relating to work decisions.
- Report any form of violation of the previous principles using the tools dedicated to this purpose.

### 4.2 Diversity

Sinergia recognizes the positive value of diversity and promotes the principle according to which all people must have equal access to work regardless of personal characteristics and conditions that are not linked to performance, competence, knowledge or qualification. For this reason it does **not resort to any form of discrimination in the working life of its collaborators** (hiring, remuneration, access to training, promotion, termination of the working relationship) based on gender, race, religion, creed, ethnic origin, nationality, caste, marital status, family responsibilities, political opinions, disability, sexual orientation or any other personal characteristic and/or condition.

#### ▼ PRACTICALLY

- Always treat all your colleagues with respect.
- Do not behave in ways that may be offensive to others.
- Promote and maintain an environment free of discrimination of any kind (including cases of harassment, bullying and retaliation).
- Report any form of violation of the previous principles using the tools dedicated to this purpose.

### 4.3 Equal opportunity

Sinergia **offers the same job opportunities to their employees**, collaborators and to those who apply to be part of them and must ensure a system of selection, management, remuneration and development of personnel based exclusively on criteria of merit and free of discrimination due to sex or any other personal characteristic, choice and/or condition.

#### ▼ PRACTICALLY

- Report any form of violation of the previous principles using the tools dedicated to this purpose.
- If you believe that discrimination based on sex exists, report it to your manager, the Human Resources Office or the Management.





## 5. ACCOUNTING RECORDS

### 5.1 Transparency and accuracy

The principles of transparency, accuracy and completeness of accounting information and financial communication are the basis of the related activities carried out in Sinergia.

For this reason, administrative and financial documentation of Sinergia must be complete, precise and reliable and each operation and transaction must be correctly authorized by the relevant Manager, registered, verifiable, legitimate, coherent and appropriate.

All Company documents, including expense reports, balance sheets, service documents, operational and production reports, reports for auditors and public bodies, must be drawn up with care and honesty by the designated Company function. **Under no circumstances should accounting books, documents and accounts of Sinergia contain false and misleading data.**

#### ▼ PRACTICALLY

- Remember that payments in cash and/or with other similar instruments are not permitted in corporate transactions except for exceptional reasons and in any case for small amounts that must be documented.
- Never report false or inaccurate data in the registrations you need to make.

### 5.2 Traceability and control

**All operations carried out must be supported by adequate documentation,** to allow a check on the reasons underlying each choice and the characteristics of the operation, both in the authorization phase and in the execution, registration and verification phase.

The supporting documentation must be easily available and archived according to appropriate criteria that allow easy consultation.

Auditors, both internal and external, must have free access to data, documents and information necessary to carry out their activities. It is expressly forbidden to prevent or hinder the performance of control or auditing activities legally attributed to the Members, other corporate bodies or the auditing firm.

#### ▼ PRACTICALLY

- Correctly archive the documentation in your possession according to Company procedures.
- Always support the auditors, internal control bodies or authorities in carrying out their functions.

# 6. HEALTH, ENVIRONMENT and SAFETY

3 GOOD HEALTH AND WELL-BEING



8 DECENT WORK AND ECONOMIC GROWTH



## 6.1 Workplace health and safety

For Sinergia it is essential to protect individual and collective health and safety.

Sinergia pursues these primary objectives by putting into practice a correct and certified Company organization, using suitable technologies and carrying out awareness-raising activities for all Collaborators and Third Parties involved through training and specific communications.

“Zero-injuries” is the target that Sinergia has set itself in terms of safety. For this reason it is committed to guaranteeing **the safety of all its environments in accordance with the highest applicable standards**, promoting and monitoring the awareness of this primary target in all its Collaborators.

Sinergia also pays particular **attention to the health and safety of its Collaborators operating at locations other than its own** (*for example at the Customer's*), taking care of their information, training and management of possible PPE.

### ▼ PRACTICALLY

- Maintain behaviors that help Sinergia guarantee your safety and health in the workplace.
- Respect all safety regulations: otherwise you will be subject to disciplinary sanctions.
- Never ignore potentially risky health or safety situations relating to products, equipment or your workstation.
- Inform your Manager of any unsafe or risky conditions according to current procedures.
- Be an active part in proposing and developing good practices or solutions that protect the health and safety of Collaborators and Third Parties.
- In case of work by third parties at our headquarters, monitor and report any violation of Company regulations and procedures, even if machinery and equipment owned by Sinergia are used.

## 6.2 Environment

Sinergia **places protection and respect for the environment at the center of its strategies**, also in consideration of the Paris Agreements and the objectives set by the UNO Agenda of 2030 on the matter.

For this reason it promotes sustainable and responsible industrial development, operates in full compliance with current national and supranational regulations and ensures the adoption of all measures and technologies capable of guaranteeing the minimization of environmental impact, the maximum energy efficiency, the careful management of natural resources, the reduction and recovery of waste and the containment of polluting emissions.

### ▼ PRACTICALLY

- Carry out separate waste collection correctly.
- Avoid wasting resources such as electricity, water, paper, etc.
- If you are a Manager, ensure that Collaborators adopt behaviors suitable for reducing the environmental impact on the workplace.
- Be an active part in proposing and developing good practices or solutions that protect the environment.

## 6.3 Safety and sustainability of products

Sinergia **designs, develops and manufactures its products in line with the most advanced technological, production and environmental practices**, with the greatest possible respect for the environment and the highest safety standards.

Furthermore, it undertakes to guarantee high standards of safety and environmental respect even during on-site installation and operation, also considering the protection of third parties who will then actually have to operate on the Products.



## 7. COMPANY INFORMATION and ASSETS PROTECTION

8 DECENT WORK AND  
ECONOMIC GROWTH9 INDUSTRY, INNOVATION  
AND INFRASTRUCTURE

### 7.1 Intellectual property

Sinergia believes that the knowledge developed internally is a fundamental resource and a heritage to be safeguarded.

Therefore, **all Collaborators are required to maintain maximum confidentiality even in the event of termination of the employment relationship.** This means that they are required not to reveal to third parties information regarding the technical, technological and commercial knowledge acquired in Sinergia except in the cases provided for by law. Also for these reasons, the Collaborator cannot transact business with competing companies, not even indirectly.

All Recipients must act in compliance with existing regulations and rights regarding intellectual property. Sinergia undertakes not to operate in violation of the intellectual property rights of third parties.

#### ▼ PRACTICALLY

- Do not disclose information regarding projects you follow and their characteristics, especially technical ones.
- Do not use patents, licenses or anything else without prior authorization from the owner (for example, in the case of software, use only original versions with correctly paid licenses).

### 7.2 Personal data

**Sinergia undertakes to collect and process personal data** in compliance with the principles of lawfulness, correctness, transparency, minimization, accuracy, updating, integrity and confidentiality, as required by European Regulation 679/2016 (GDPR).

The processing is carried out in compliance with the opinions of the Italian Guarantor for the Protection of Personal Data and the relevant national or international regulations.



## 7.3 Company assets

**Company assets and resources are available to employees to carry out their work activities.** The Recipients must manage and use them efficiently and protecting their value.

**Any use in conflict with the principles and interests of Sinergia is absolutely prohibited.**

Under no circumstances it is permitted to use Company assets and especially Company IT equipment, to commit or induce the commission of crimes or to pursue any purpose contrary to current laws or which may constitute a threat to public order, the protection of human rights or morality.

### ▼ PRACTICALLY

- Use the tools that Sinergia makes available only for carrying out your work activity and in compliance with current laws and regulations.
- Pay particular attention to the security of your IT equipment and correctly keep the assigned passwords.



## 7.4 Social media

**A correct use of social media is essential for the creation and development of a positive image of Sinergia.** For this reason, their use is reserved exclusively for the corporate functions expressly appointed to do so, who must act in full compliance with the principles of transparency, accuracy and timeliness.

Payments or other benefits aimed at influencing the professional activity of the media are not permitted.

### ▼ PRACTICALLY

- Do not use Company social channels unless expressly authorized.
- If your role requires contact with the media, always maintain a relationship based on the principles of lawfulness, correctness and transparency.
- Use clear, transparent and non-discriminatory communication methods, according to the principles of SA8000.

## 8. EXTERNAL RELATIONS



### 8.1 Local community and social context

The territory in which the activities of Sinergia are located and the related communities represent some of the main stakeholders. For this reason Sinergia actively promotes relationships with them in the forms required by current regulations, always maintaining a relationship of correctness and integration.

### 8.2 Customers

The satisfaction of the customer is fundamental for a lasting success and must be pursued by guaranteeing the excellence of the product and related services, in accordance with the principles and values indicated in the Code of Ethics. Relationships with the customer must be based on principles of ethics, mutual transparency, respect for market rules.

#### ▼ PRACTICALLY

- When dealing with customers you must maintain compliance with the principles set out in the Code of Ethics, be correct and promptly fulfill contractual obligations.
- Customers are also Recipients of the Code of Ethics; send them all the necessary documentation, as required by the Organizational Model 231 and the Company procedures, including the indications necessary to make a report.

### 8.3 Suppliers

To create our products according to the qualitative, environmental, temporal, ethical and aesthetic criteria that are peculiar to us, it is essential to select high-level suppliers in all respects.

For this reason, the selected suppliers must observe and respect the values and principles expressed in this Document and in all Sinergia documentation dedicated to them.

Sinergia is in turn committed to maintaining ethical and transparent behavior, guaranteeing equal opportunities to every potential supplier and developing a constant and constructive dialogue with them.

The selection of suppliers must be based on the evaluation of the quality of services and products, their competitiveness and innovation, the consistency of performance, the competitiveness of costs in relation to other characteristics and the ethical, social and environmental compatibility.

#### ▼ PRACTICALLY

- If you are a Collaborator, at the beginning of a relationship with a Supplier, always send the Code of Ethics and the documents required by Company procedures.
- If you are a supplier, as a Recipient, we ask you to respect the values and principles expressed in the Code of Ethics, considering that the failure to comply may put an end to the supply relationship.
- If you are a Collaborator, always deal with suppliers with transparency and fairness, guaranteeing fair opportunities



## 8.4 Public administration

All relationships with the Public Administration must be characterized by rigorous observance of the principles of legality and transparency.

The Recipients may not in any way offer or receive any benefit of value, nor make any type of payment in the context of relations with the Public Administration to obtain or maintain any type of advantage in favor of Sinergia.

### ▼ PRACTICALLY

- Never offer gifts, acts of hospitality and entertainment expenses (regardless of their value) to officials/employees of the Public Administration.
- Never make payments to a Public Administration official/employee to expedite routine government procedures.
- Do not pay the expenses of a Public Administration official/employee, including those for business trips.

## 9. DIFFUSION and APPLICATION of the CODE of ETHICS

### 9.1 Propagation of the Code of Ethics and supervision of its application

Sinergia ensures the propagation of this Code of Ethics through all possible channels, including publication on Company noticeboards, physical and virtual, and publication on the website and on the social channels used. It also provides training to all Collaborators and informs the Recipients of the provisions contained therein, provides clarifications on the interpretation of the principles and provisions contained therein, and verifies its effective observance. The Management ensures the periodic updating of the content of the Code in line with the needs that arise as the context and environment of reference changes (*such as, by way of example, Company organization, market, legislation*).

### 9.2 Implementation

#### 9.2 The recipients of the Code, and primarily the Collaborators of Sinergia, are required to know and respect the provisions of the Code of Ethics.

They also have the obligation to report any alleged violations of the same to the Supervisory Body established by the Company pursuant to Legislative Decree 231/2001, through the dedicated e-mail box or ordinary mail addresses, reported in the Organizational Model adopted by the Company indicating the words "Code of Ethics" on the envelope.

The Supervisory Body will therefore act in accordance with the provisions of the Organizational Model and will guarantee maximum confidentiality on the identity of the reporter.

### Violations of the Code of Ethics

#### 9.3 It is the duty of all interested Parties to rigorously apply and enforce the provisions contained in the Code of Ethics when acting in the name and/or on behalf of Sinergia.

Since the Code of Ethics is the subject of specific information for Collaborators and is made known to everyone through communication channels, any violations cannot in any way be justified by virtue of ignorance or only partial knowledge of it.

Violation of the Code of Ethics by Collaborators may lead to disciplinary action, up to and including dismissal, in accordance with the applicable regulations and the current Metalworking and Mechanical Engineering Industry Collective Agreement (CCNL). It may also lead to compensation for any damages suffered by Sinergia due to the disputed violation.

Sinergia does not have commercial relationships with Interested Parties who have violated the provisions of the Code of Ethics.

In any case, any violation of the Code of Ethics may result in legal action against responsible persons or parties.

#### ▼ PRACTICALLY

- If you become aware of illegal or unethical situations implemented by or towards Customers, you must immediately report it via the appropriate system set up on the Company website.
- Violation of the principles of this Document entails disciplinary actions, up to and including dismissal, in accordance with the applicable regulations and the Metalworking and Mechanical Engineering Industry Collective Agreement (CCNL).
- The behavior of anyone who accuses others of violation with the knowledge that such an accusation does not exist also constitutes a violation of the Code of Ethics.

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*Inspired by the **beauty** all around us, we are committed to make our products **respectful of the ambient** where they are produced and will be installed, to design them taking care of **constructive details**, functionally, and aesthetics. In the conviction that this approach makes the difference in getting into deep connection with people.*

”

Norma Scandella - CEO



**Sinergia S.p.A.**

Via Serio, 29 - 24021 Albino (BG) - ITALY

Phone: +39 035 0527200 | Fax: +39 035 0526085

[www.sinergia-it.com](http://www.sinergia-it.com) | [info@sinergia-it.com](mailto:info@sinergia-it.com)

C.F. - P.I. - C.C.I.A.A. IT 02486780162 | Cap. Soc. € 1.000.000 i.v