

# ETHICAL CODE

(Under D. Lgs. 231/2001)

## 1. Premise

ZEN CARBURANTI SRL adopts this Code of Ethics as an integral part of its Model of Organization, Management and Control, in accordance with the D. Lgs. 231/01, to prevent crime and promote a corporate culture based on integrity, transparency and accountability.

## 2. Basic principles

The company undertakes to respect the following basic principles:

- Legality: Compliance with national and international laws and regulations.
- Integrity and Transparency: Fairness and clarity in relations with customers, suppliers, employees and stakeholders.
- Responsibility and Sustainability: Commitment to the protection of the environment, health and safety at work.
- Confidentiality and Data Protection: Protection of sensitive and confidential information of the company and the parties involved.
- Fair competition: Promotion of a fair and competitive market, without unfair practices.

## 3. Scope of Application

The Code of Ethics applies to:

- Members, directors and managers
- Employees and collaborators
- Suppliers, customers and business partners
- All those who act on behalf of the company

## 4. Rules of Conduct

### 4.1 Relations with Customers and Suppliers

- Ensure clarity, accuracy and completeness of business information.
- Select suppliers according to quality, transparency and competition.
- Reject any form of corruption or misconduct.

### 4.2 Relations with employees and collaborators

- Ensure a safe, inclusive and dignified working environment.
- Promote professional growth and enhance merit.
- Prevent all forms of discrimination and abuse.

### 4.3 Relations with the public administration

- Operate with transparency and fairness in relations with public bodies.
- Prohibit any form of offering money or personal benefits to public officials.

### 4.4 Environmental and safety protection

- Take measures to reduce the environmental impact of business activities.
- Ensure compliance with occupational safety regulations.

## 5. Control and Sanctions System

- The violation of this Code of Ethics entails disciplinary sanctions, in accordance with Model 231 and the employment contract.
- A Supervisory Body (OdV) is established to monitor compliance with the Code and receive reports of violations.

## 6. Reporting Mode

- Anyone who becomes aware of violations may report them to the Supervisory Body through confidential channels, ensuring the protection of the informer.

## CONTACTS

Legal and operational headquarters  
ZEN CARBURANTI S.R.L.

Address: Via G.Bettiol n°15, Padova PD

Telephone: +39 328 123 8981 , Email: [ceo@zencarburanti.com](mailto:ceo@zencarburanti.com) , VAT: 05689930286 , REA code: PD - 485342