



	Code of Ethics
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CODE OF ETHICS

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### 0.1 - Preamble

This document, called the Code of Ethics, regulates the complex set of rights and responsibilities that the company expressly assumes towards those with whom it interacts in the course of its activities.

In full accordance with the positions expressed and protected by the accreditation system to which it adheres, the organisation is aware of its role in contributing to the development of the Italian economy and the civil growth of the country. This contribution is made with a sense of responsibility and moral integrity.

The company believes in the value of work and considers the legality, correctness and transparency of its actions as indispensable prerequisites for achieving its economic, productive and social objectives.

The company affirms the congruence of its own Code of Ethics in the pursuit of its social mission.

The Code of Ethics also aims to introduce and make binding on the Company the principles and rules of conduct relevant to the reasonable prevention of the offences referred to in Legislative Decree 231/2001.

The Code of Ethics, considered as a whole, together with all the specific implementing procedures approved by the Company, is an integral part of existing and future subordinate employment contracts in accordance with Article 2104 of the Civil Code (Employee Diligence).

Failure to comply with its provisions will constitute a disciplinary offence and, as such, will be prosecuted and sanctioned by the company in accordance with the provisions and effects of Article 7 (Disciplinary Sanctions) of Law No. 300/1970 (Workers' Statute - Rules for the Protection of the Freedom and Dignity of Workers, Trade Union Freedom and Trade Union Activities in the Workplace, and Rules on Placements). It can also lead to compensation for any damage caused to the organisation.

With regard to the employees, consultants and independent professionals (as specified in the addressees below) who provide their services to the Company and to other third parties, the signing of this Code of Ethics, or of an extract from it, or in any case, the observance of the provisions and principles contained therein, is a condition sine qua non for the conclusion of contracts of any kind between the Company and these subjects. The provisions thus signed or, in any event, approved, even by conclusive acts, form an integral part of such contracts.

In the light of the foregoing, any breach by the entities referred to in the preceding paragraph of specific provisions of the Code of Ethics may, depending on its seriousness, justify the termination of contractual relations between the Company and such entities and may also be identified in advance as a reason for the automatic termination of the contract pursuant to Article 1456 of the Civil Code (express termination clause).

## 0.2 - Recipients of the Company's Code of Ethics

With this Code of Ethics, the company aims to define moral values, clear rules, and procedures to be adopted by all.

The Code of Ethics is addressed to:

- **Members of the governing bodies**
- **Employees (under both fixed-term and open-ended contracts)**
- **Project workers**
- **External and internal consultants**
- **Suppliers of goods and services**
- **Any other subject entitled to act in the name and on behalf of the company, both directly and indirectly, on a permanent or temporary basis, or anyone who establishes relationships with the company and works to pursue its objectives.**

Recipients of this Code of Ethics are required to understand and comply with its content and precepts.

The Code of Ethics will be made available to recipients in the ways specified below.

The company's management, or another person delegated by same, is responsible for the implementation of the Code of Ethics and its dissemination both inside and outside the organization.

Company employees, besides complying with applicable regulations and the provisions set forth in collective bargaining agreements, undertake to adapt their working methods to the aims and provisions outlined in this Code of Ethics.

This applies to both internal company relationships and relationships with external subjects working with the company, above all the public administrations and other public authorities.

An essential requirement for any constructive relationship with the company is compliance, by the other recipients, with the principles and provisions contained in this Code of Ethics.

In this respect, when contracts or agreements are entered into with other recipients, the company transmits a copy of this document to such counter-parties.

## 1.0 - Introduction

The principles indicated below are considered fundamental, and our organization thus undertakes to respect them in relationships with any subject.

These values are not to be considered sterile declarations but must be translated into actual behavior and actions within the company.

As an organization and as individuals, all recipients are required to adopt these values correctly in their work and in relationships both inside and outside the work environment.

The fundamental values on which the company's activities are based include:

1.1 Integrity in compliance with laws and regulations

1.2 Rejection of all forms of discrimination

1.3 Centralisation, development and improvement of human resources and equality of authority

1.4 Territorial Rootedness

1.5 Transparency and business ethics

1.6 Quality

1.7 Diversity

1.8 Legality and the fight against terrorism and criminal activities

The company expects these values to define its identity and unite employees and collaborators within the global organization.

### 1.1 – Correct Behavior and Compliance with Laws and Regulations

Our company is committed to providing high-quality services and competing on the market respecting the principles of fair competition and transparency. We also maintain correct relationships with all public, government and administrative bodies, with the public and with third-party enterprises.

We expect everyone to operate with uprightness, transparency, coherence and fairness in any context, conducting every business relationship with honesty.

Our company operates in full compliance with the law and we strive to ensure that all personnel act accordingly, regardless of the context, activities or locations in which they operate. This commitment extends to consultants, suppliers, customers and anyone who engages with our organization. The company will not enter into or continue any collaboration with third parties that do not uphold this principle.

## 1.2 - Rejection of Any Form of Discrimination

In decisions that impact relations with stakeholders (personnel management and work organization, supplier selection and management, relations with the local community and with the institutions that represent it), our organization shuns any form of discrimination based on age, gender, sexual orientation, health status, race, nationality, political opinions, and religious beliefs of our counter-parties.

## 1.3 - Centrality, Development, and Appreciation of Human Resources and Fairness of Authority

We acknowledge the centrality of human resources and believe that the professional contributions of individuals who work in our company are essential for its success and development. We uphold professionalism and the individual contribution of people, promoting an approach based on seeing the work of each individual as a fundamental part of both corporate and personal growth.

We also place dialogue, the pooling of information at all levels, professional growth of our people and the creation of a corporate identity and sense of belonging at the heart of our daily operations.

This value translates into:

- **the creation of a work environment that values the contribution and potential of individuals by gradually increasing personnel responsibility**
- **the construction of a relationship system that prioritizes teamwork over hierarchical relationships**
- **daily efforts aimed at pooling know-how and skills, also by adopting innovative systems**

We attach great importance to resources who work in our organization, because it is through them that we can provide, develop, improve and ensure the optimal management of our services. Without prejudice to legal and contractual obligations regarding employees' responsibilities, we expect employees to demonstrate professionalism, dedication to their work, loyalty, respect, a sense of belonging and morality.

In managing contractual relationships that imply the creation of a hierarchy, our company is committed to ensuring that authority is exercised fairly and correctly, avoiding any form of abuse. Specifically, we ensure that authority does not transform into the wielding of power that undermines the dignity and autonomy of individuals. These values must be upheld when making decisions regarding work organization.

## 1.4 - Territorial Engagement

Our company aims to implement projects that directly involve the community, public and private institutions, businesses and associations in matters related to health education, prevention and taking responsibility for one's well-being. We act and will continue to act to ensure that partners adopt the same behavioral standards and align their activities with the same principles and values.

We promote local growth also through a sincere relationship with stakeholders in the local community. We operate in the local community, developing a rich and generative society able to recognize and value its resources, existing skills and potential, gender, cultural and ethnic diversity, promoting well-being, integration, social development and recognition by service users and those who physically provide the service.

## 1.5 - Transparency and Business Ethics

The history, identity and values of our organization are expressed through business ethics founded on:

## 2 Reliability

considered as a guarantee of absolute professionalism in projects, transactions and commitments.

## 3 Solidity

of the organization with a consolidated financial background, demonstrated by its long-standing activity.

## 4 Transparency

based on the concept of a social role that not only demands respect of ethical principles and practices but also the adoption of methods that allow communities and social stakeholders to access information and thus understand our actions.

## 5 Fair contracts

avoiding situations in which anyone acting on behalf of the company seeks to exploit contractual loopholes or unforeseen events to renegotiate the contract solely to take advantage of the dependent or vulnerable position of the other party.

## 6 Protection of competition

refraining from collusive, predatory and abusive behavior.

### 1.6 - Quality

Quality is a distinctive feature of our company. The organization undertakes to ensure quality in all its activities, in line with its long-term strategy.

Activities are carried out by the company through a set of processes managed within a quality management system that offers third parties consistency, transparency, and service improvement.

### 1.7 - Diversity

The company requires that the Board of Directors, employees, and collaborators act in such a way as to guarantee full respect for human dignity. Therefore, the organization:

- 7 Ensures strict compliance with regulations regarding child labor, freedom and workers' rights
- 8 Ensures conditions for the free membership of trade unions
- 9 Does not tolerate violations of human rights
- 10 Promotes integration within the social fabric as a form of collective enrichment

Specifically, the company condemns any form of discrimination based on gender, ethnicity, political or religious belief.

### 1.8 – Legality, Anti-terrorism and Fighting Crime

The company strongly believes in democratic values and condemns any activities that may have purposes related to terrorism or undermining democratic order.

The organization also condemns activities involving:

- Counterfeiting, forgery, alteration and/or spending of coins, public credit cards and stamp values



- Acceptance and processing of the revenue from criminal activities (money laundering)
- Unauthorized access to external computer systems
- Unauthorized possession of access codes
- Damage to equipment and data
- Fraud in the management of electronic signature certification
- Interception, prevention, and interruption of computer communications
- Promotion of tolerance and secrecy regarding the use of drugs or any addictive substances
- Incitement to commit illegal or morally reprehensible acts
- Negligence in countering violence, damage to public property and compliance with internal regulations

## 2.1 - Customers

The company's main goal is the full satisfaction of our customers' needs. In this respect, the organization ensures optimal performance of assignments entrusted and strives constantly to propose increasingly advanced and innovative solutions that focus on integration, effectiveness, efficiency and cost-effectiveness.

The company provides accurate, complete and truthful information to enable customers to make rational and informed decisions. It protects the privacy of its customers in accordance with applicable regulations, undertaking not to disclose personal data except where required by law.

The company also adopts a communication style based on efficiency, collaboration and courtesy.

## 2.2 - Financial Institutions

The organization maintains relationships with financial institutions based on correctness and transparency, with the aim of creating value for the company. Therefore, financial institutions are chosen based on their reputation, as well as their adoption of values that are compatible with those expressed in this Code of Ethics.

## 2.3 - Suppliers

### **Suppliers of Goods and Services**

The company establishes collaboration relationships with its suppliers in compliance with applicable regulations and the principles of this Code of Ethics. Attention is paid to the highest professional standards, ethical practices, health and safety and environmental protection.

### **Internal and External Consultants**

Consultants are chosen based on their professionalism, reputation and reliability as well as their alignment with values that are compatible with those expressed in this document. Relationships with consultants are founded on transparent agreements and constructive dialogue aimed at achieving common goals in accordance with regulations and the principles of this Code of Ethics.

## 2.4 - Public Administration

The term "Public Administration" refers to any person, entity or qualified subject serving as a Public Official or Civil Servant working on behalf of the central or peripheral Public Administration, Public Supervisory Authorities, Independent Authorities, European Institutions and as authorized private providers of a Public Service.

The company is inspired by and aligns its conduct, in relationships with the Public Administration, whether Italian or foreign, with the principles of correctness and honesty. In this regard, individuals appointed by the company to manage any negotiations, requests or institutional relationships with the Public Administration must not, under any circumstances, seek to unduly influence its decisions or engage in illicit behavior, such as offering money or other benefits that could compromise the impartiality of the Public Administration representative.

Individuals appointed by the company to manage relationships with any Public Administration authority must ensure that information provided by any means and for any purpose is accurate and correct. Only individuals expressly appointed by the company may have direct contact with the Public Administration on behalf of the company.

No other employee may engage in any relationship with the Public Administration for activities related to the company's business.

In tenders, persons appointed by the company must comply with law and related regulations.

### **Employment of Former Public Administration Employees**

The hiring of former Public Administration employees or their relatives who, in the course of their duties, have had a relationship with the company, is based on full compliance with standard procedures defined by the organization for personnel selection.

Other employment or consultancy relationships with former Public Administration employees or their relatives are managed in accordance with standard procedures.

### **Grants and Funding**

Contributions, grants or funding received from the European Union, the Government or any other Public Entity, regardless of the value or amount, must be used for the purposes for which they were requested and granted.

The company prohibits recipients of this Code of Ethics from using funds received from Public Administrations and/or interprofessional funds for purposes other than those for which they were allocated.

Similarly, when taking part in public procurement procedures, the recipients of this Code of Ethics are required to act in accordance with law and sound business practices, above all avoiding any incitement of Public Administrations to act improperly in favor of the company.

The organization is committed to preventing acts that could lead to illicit advantages for the recipients of this Code of Ethics.

It is also considered illegal to use altered or forged statements or documents or to omit information or engage in any kind of fraud or deceit to obtain subsidies, permits, financing or contributions from the European Union, the Government or any other Public Entity.

## 2.5 - Public Supervisory Authorities

Recipients of this Code of Ethics undertake to:

- Strictly observe the provisions issued by the competent institutions or Public Supervisory Authorities regarding compliance with the regulations applicable to their respective areas of remit
- Avoid submitting applications or requests containing false statements during investigations involving Public Institutions and/or Public Supervisory Authorities, with the aim of obtaining public funds, contributions, or facilitated financing, or unduly obtaining concessions, authorizations, licenses or other administrative acts
- Comply with any requests from the aforementioned institutions or Authorities within the context of their supervisory functions, providing full cooperation when requested and avoiding obstructive behavior

## 2.6 - Political Parties, Stakeholder Associations and Institutions

The company engages in a transparent way with all political parties, associations operating in the local communities and public (local and national) institutions to duly represent its position on matters and issues of interest.

### 3.1 - Professionalism

Each person performs their work and services with diligence, efficiency and correctness, making the best use of the tools and time at their disposal and assuming the responsibilities associated with their duties.

### 3.2 - Loyalty

Individuals are expected to be loyal to the company.

### 3.3 - Honesty

Within the scope of their work, company employees are required to diligently know and comply with Model 231 and current law provisions. Honesty is the underlying principle for all the company's activities and projects and is an essential value of organizational management. Relationships with stakeholders must be based on principles of correctness, collaboration, loyalty and mutual respect. In no case can the pursuit of the company's interest justify dishonest conduct.

### 3.4 - Legality

The organization is committed to complying with all national and international rules, laws, directives and regulations, as well as generally acknowledged practices. It also inspires its decisions and behavior on safeguarding the public interest entrusted to it.

### 3.5 - Correctness and Transparency

Individuals should not use information, assets or equipment they have access to for personal purposes. No-one should accept or exert any pressure, make recommendations or suggestions that could harm the company or gain undue benefits for themselves, the company, or third parties. Each individual should reject and not make promises of improper offers of money or other benefits. The company undertakes to operate in a clear and transparent manner, without favoring any interest group or individual.

### 3.6 - Confidentiality

Individuals ensure utmost confidentiality regarding information and data about the company's assets or related to business activities, in compliance with law provisions, current regulations and internal procedures. Furthermore, individuals in the company are prohibited from using confidential information for purposes unrelated to the performance of their activities.

### 3.7 - Responsibility to the Community

Aware of its social role within the reference area, of economic and social growth and of the general well-being of the community, the company will operate respecting national and local communities, supporting initiatives of cultural and social value to enhance its reputation and legitimacy to operate.

### 3.8 – Resolution of Conflicts of Interest

Individuals should pursue the company's objectives and interests in the performance of their activities. They should promptly inform their line managers or focal points of situations or activities in which there may be a conflict of interest, whether involving themselves or close relatives and in any other cases where important reasons arise. Individuals should respect the decisions taken by the company in this regard.

### 3.9 - Sense of Belonging

In the performance of their work, individuals put in place all actions that do not hinder or compromise the creation of a sense of belonging to their organization, workgroup or third parties.

### 3.10 - Mutual Respect

Individuals who collaborate with the company, in any capacity, should demand and actively demonstrate respect for their duties, skills and the methods to adopt to perform the assigned tasks, also by refraining from expressing personal opinions to third parties.

### 3.11 - Specific Obligations

Company employees should follow the indications indicated below:

#### **Transparency**

It is good practice for all information regarding activities carried out within the company to be accessible to everyone.

Each collaborator has the duty to report to their manager and co-workers on the work they have carried out.

In cases of misunderstandings or problems, it is each person's duty to communicate with their line manager or focal point.

Behave loyally and independently of any influences that may affect their work, both with clients and with external organizations with which they interact.

Do not engage in improper financial relationships and do not accept valuable gifts or favors of any kind from organizations that are their client's suppliers.

On accepting a professional assignment and during its performance, report any relationships or shared interests with external organizations that interact with your client, which could lead to conflicts of interest.

## **Coherence**

Once a commitment is made, it should be fulfilled. Never leave a job incomplete, and never take on commitments that you already know you cannot follow through.

## **Courtesy and Kindness**

Courtesy and kindness should be the foundation of daily activities and should be a constant in interpersonal relationships, both internally and externally.

## **Punctuality**

If you are late for an appointment, it is good practice to notify the person you are intending to visit before the agreed time. Doing so later is impolite. Punctuality is a form of respect for those waiting for you.

## **Confidentiality**

All information and data managed in the workplace are the company's property, are confidential and must be treated as such. Specifically, you should never discuss work-related problems or situations in public places where you may be overheard, or in the presence of people who have no right to know the information in question.

## **Professionalism**

Being professional means knowing the appropriate behavior to adopt and what is required to perform your job to the best of your ability, taking into account the needs of clients and the company. Regardless of the activity you are involved in, you should always be professional.

## **Work Environment**

Everyone should be able to understand the phenomena that underpin interpersonal relationships and adopt behavior consistent with the reference context, always trying to maintain a polite, cordial and collaborative atmosphere with co-workers.

## **Loyalty and Respect**

It is the duty of everyone to disseminate the company policies and ensure they are respected. During daily activities, you should always preserve the interests and image of the company and respect company property. While carrying out your activities, you should always consider the economic implications of your choices, avoiding waste.

## **Respect for the Client**

The company, like all companies in a free market, exists thanks to its clients. Respect, kindness and courtesy should be a constant in interactions with people who come into contact with the organization.

## **Workstation**

You are responsible for your workstation. You are responsible for the care and cleanliness of the tools at your disposal.

## **Personal Computers**

Personal computers provided should be maintained in the best possible condition, and no programs other than those included in the company's configuration should be installed.

The hardware provided by the company is, in all respects, a work tool and cannot be used for personal purposes.

Specifically, the files contained on it are company property and cannot be arbitrarily damaged or destroyed.

The use of hardware suitable for copying and/or storing files and data, such as USB flash drives, laptops, optical disks, burners and any other electronic storage media is strictly prohibited unless explicitly authorized by the company.

### **Internet**

Internet connectivity is a work tool and should be used as such.

The use of the Internet for personal purposes is permitted only outside working hours.

Internet browsing:

- Is not permitted for sites that are not directly related to the performance of the assigned tasks, especially those that may reveal the employee's political, religious, or trade union beliefs
- Is not permitted for any kind of financial transaction, including online purchases and similar transactions, except in cases directly authorized by the company and in compliance with normal purchasing procedures
- The download and installation of free software (freeware), shareware, P2P and/or FTP taken from internet sites is strictly prohibited unless explicitly authorized by the company
- Registration on websites whose content is not related to work activities is prohibited
- Participation, for non-work related reasons, in forums or the use of chat lines is not allowed. Storage of documents of an insulting and/or discriminatory nature based on sex, language, religion, race, ethnic origin, opinion and trade union and/or political affiliation, etc. is prohibited.

### **Email**

Email is a company tool and should not be considered private correspondence.

- Any work-related email message (since it pertains to work activities) can be copied and/or made public at any time
- It is not permitted to use email (internal or external) for purposes unrelated to the performance of assigned tasks
- It is not permitted to send or store messages (internal or external) of an insulting or discriminatory nature based on sex, language, religion, race, ethnic origin, opinion and trade union and/or political affiliation, etc.
- It is not permitted to configure and use email accounts outside the company

### **Mobile Phones**

The use of mobile phones has rules of good behavior that should always be followed.

Even although they are a work tool, mobile phones should always be kept silent during work meetings and meetings with clients, especially when on their premises.

The use of the mobile phone for personal purposes should be kept to a minimum and only in cases of emergency.

### **Company Cars**

Company cars are the responsibility of the person to whom they are assigned, just like all company assets.

They should be used and services with the utmost care and be driven in full compliance with the rules of the Highway Code.

The driver is responsible for cleanliness and maintenance of the car and for ensuring that it is always in excellent working order.

Fines for traffic violations are the responsibility of the driver.

### **Private Cars**

The use of a private car for work purposes is allowed and, as with company cars, the driver must operate in full compliance with road traffic regulations.

Fines for traffic violations are the responsibility of the driver.

## **4.0 - Introduction**

The rules contained in this section have the aim of informing recipients of this Code of Ethics about the attitudes and behavior to adopt during working activities in accordance with the values outlined in this document.

All recipients of this Code of Ethics (identified in Chapter 0 of this document) are obliged to maintain proper and transparent conduct in the performance of their duties, thus contributing to the effectiveness of the internal control system for the protection of the corporate value.

In compliance with legal standards, all recipients must be available to the corporate bodies and supervisory authorities.

### **4.1 – Relations with Employees**

For further details, please refer to the relevant Procedures of the System for Management 231. In general:

#### **☒ Employee Selection**

The assessment of personnel to be hired, or engaged as contract staff, is based on correspondence of the candidates' profiles with those being sought and internal needs, in compliance with equal opportunities for all stakeholders. The information requested is strictly related to verification of the aspects declared in the professional and psycho-aptitude profile, respecting the candidate's private sphere and opinions. In the selection process, the General Management takes appropriate measures to avoid favoritism and any form of benefit, making a careful selection based not only on mandatory aspects but also on preferential aspects defined by the Board of Directors.

#### **☒ Establishment of Employment**

Personnel are hired under an official employment contract, professional service contract or internship agreement. No form of undeclared work will be tolerated.

## **☒ Honesty and Protection of the Individual**

In the management and growth of personnel, as well as during the selection process, decisions are made based on the correspondence between expected profiles and the profiles possessed by individuals, or on merit-based considerations. Access to roles and positions is granted based on skills and capabilities. Furthermore, where compatible with overall work efficiency, forms of work organization that facilitate pregnant individuals and those who need to care for their children are promoted.

## **☒ Growth and Training of Resources**

The company provides employees with information and educational tools with the aim of improving specific skills and preserving their professional value. Institutional training is provided at specific stages of an employee's professional life, starting from an introduction to the job for new hires, and recurrent training for operational personnel (for example, on workplace safety, the 231 model and the code of ethics).

### **4.1.1 - Health and Safety**

The company undertakes to provide a work environment that protects the health and safety of its personnel, promoting a culture of safety, raising awareness of risks and encouraging responsible behavior among all personnel.

The company also strives to preserve the health and safety of workers, primarily through preventive actions.

One of the main objectives is to protect human resources by continuously seeking the necessary synergies, not only internally but also with suppliers, external consultants and customers involved in the company's activities.

All employees are required to comply with internal rules and procedures regarding risk prevention and health and safety, promptly reporting any shortcomings or violations of applicable regulations.

The company follows general measures for ensuring occupational health and safety, in particular those prescribed by law, with specific reference to Legislative Decree 81/08 as amended. The organization is committed to full compliance with all regulations concerning health and safety at work for employees, collaborators, and users. Specifically, it:

**☒ Defines the operating procedures to be followed and coordinates activities related to health and safety at work**

**☒ Ensures the application of current regulations by creating risk assessment documents and defining processing procedures in line with current safety standards**

**☒ Constantly monitors legislative developments and strives to implement them**

The company also undertakes to:

**☒ Assess all health and safety risks**

**☒ Plan prevention efforts to create a comprehensive approach that incorporates operational conditions and the impact of environmental and work organization factors in prevention, in line with technical advances**



- ☑ **Eliminate risks or, where this is not possible, minimize them to the lowest possible level based on knowledge acquired through technical progress**
- ☑ **Adopt ergonomic principles in the work organization, job design, equipment selection and work and service delivery methods, especially to reduce the health effects of monotonous and repetitive work**
- ☑ **Reduce risks at the source**
- ☑ **Replace what is dangerous with what is not or is less dangerous**
- ☑ **Minimize the number of workers exposed to risk**
- ☑ **Limit the use of chemical, physical, and biological agents at the workplace**
- ☑ **Prioritize collective protection measures over individual ones**
- ☑ **Perform health checks on workers**
- ☑ **Remove workers from exposure to risk for health reasons related to their health and move them to another job where possible**
- ☑ **Provide adequate information and training for workers, executives, representatives of workers' safety and all personnel**
- ☑ **Give employees correct instructions**
- ☑ **Include workers and workers' safety representatives in the planning of appropriate measures to ensure ongoing safety improvements, including the adoption of codes of conduct and best practices**
- ☑ **Plan emergency measures for first aid, firefighting, evacuation of workers and serious and immediate danger**
- ☑ **Use warning and safety signs**
- ☑ **Regularly maintain environments, equipment and facilities, paying special attention to any safety devices according to the manufacturers' instructions**
- ☑ **Provide adequate instructions to employees, collaborators and users and provide them with training according to legal requirements and the national collective bargaining agreements applied to personnel**

#### 4.1.2 - Privacy

In the processing of personal data, the company complies with the provisions of European Regulation 679/2016. Employees are provided with a privacy policy that specifies:

- ☑ **Purposes and methods of processing**
- ☑ **Any recipients to whom the data is communicated**
- ☑ **Information necessary to exercise the right of access as of Article 15 of the GDPR**

In cases where regulations require it, individuals are asked for specific consent to process their personal data. Any investigation into employees' ideas, preferences, personal tastes and private lives is ruled out.

The same procedure is applied for the processing of information and personal data using electronic equipment.

#### 4.1.3 - Environmental Protection

The organization is committed to environmental protection through compliance with national and EU legislation.

It aims to prevent pollution and raise awareness among employees and collaborators on environmental issues.

#### 4.2 - Duties of the Personnel

For further details, please refer to the procedures of the 231 management system.

Individuals must act in good faith to fulfil the obligations as of the employment contract and those stipulated in the Code of Ethics, ensuring the necessary performance.

##### 4.2.1 - Delegations and Responsibilities

The duties, responsibilities and powers of the Board of Directors, employees and collaborators are defined in specific resolutions and/or procedures.

These duties, responsibilities and powers must be known, accepted and respected.

##### 4.2.2 - Obligations for Function Managers regarding the Code of Ethics

Each function manager, as identified in the organization chart, in job descriptions, and/or the delegation system, is obliged to:

- Ensure compliance with the Code of Ethics by persons directly or indirectly under their responsibility**
- Set an example for their employees/collaborators with their own behavior**
- Ensure that employees understand that the provisions of this Code of Ethics are an integral part of their work**
- Promptly report any special requirements or reports from their subordinates to the General Management or a designated representative or the Supervisory Body (OdV)**

Failure by function managers to fulfil the obligations outlined in this chapter may result in disciplinary measures, as specified by the penalty system.

##### 4.2.3 - Obligations for all Employees regarding the Code of Ethics and Company Documents

Each employee is expected to know the provisions contained in the Code of Ethics and any related laws regulating their functions, which form an integral part of each person's work.

Any employee who becomes aware of alleged unlawful conduct must report such conduct solely to their line managers or the Supervisory Body (OdV) and/or General Management in accordance with the internal system.

General Management implements monitoring systems to verify that employees, collaborators, etc. read and understand the mandatory legal documents, by means of anonymous tests and taking the most appropriate actions to continuously raise the level of dissemination and understanding of their contents.

Employees are also obliged to:

- Refrain from behavior contrary to these provisions and rules**

- ☒ **Contact their line managers, the Supervisory Body or the representative appointed to manage the prevention model for necessary clarifications regarding the application of the Code of Ethics or relevant regulations**
- ☒ **Promptly report any information about potential violations of the Code of Ethics to at least one of the above-mentioned parties**
- ☒ **Cooperate with the organization in the event of investigations aimed at verifying and, if necessary, sanctioning violations**

These behavioral requirements also apply to external consultants and collaborators of all kinds.

#### 4.2.4 - Protection of Company Assets

Each recipient is responsible for diligently protecting company assets from improper or incorrect use.

Individuals must follow internal policies regarding IT security to ensure the integrity, confidentiality and the availability of information and know-how.

Information and know-how must be protected with utmost care. Significant data obtained or created by the company during its activities must be treated as confidential and processed with due care. This includes information obtained from and concerning third parties (clients, contacts, partners, employees, etc.).

Individuals who come into possession of confidential information, materials or documents in the performance of their duties must inform their superiors.

Even after the termination of their employment relationship with the company, individuals may use confidential data exclusively in the company's interest and not for their own benefit or that of third parties.

#### 4.2.5 - Confidential Information about Third Parties

The company's personnel must refrain from using illegal means to obtain confidential information about other organizations and third-party entities.

Individuals who, in the course of a contractual relationship, become aware of confidential information about other subjects, must use it exclusively in accordance with the relevant contract.

Without the appropriate authorization, individuals may not request, receive or use confidential information about third parties. If individuals become aware of confidential information about another subject that is not already covered by a nondisclosure agreement or other form of protection, they must seek assistance from their line manager for the processing of such information.

#### 4.2.6 - Use of Company Assets

Individuals must act diligently to protect company assets through responsible behavior in line with operational procedures on their use, carefully documenting their utilisation. Specifically, individuals must:

- ☒ **Use the assets entrusted to them carefully and sparingly**
- ☒ **Avoid improper use of company assets that may cause damage, reduce efficiency or be contrary to the company's interests**
- ☒ **Keep the resources entrusted to them safely and promptly report any threats or damage to the relevant units**

In the case of computer applications, individuals must:

- ☑ Strictly follow the company's security policies to avoid compromising the functionality and security of IT systems**
- ☑ Refrain from sending malicious or offensive emails or using low-level language or making inappropriate comments that may offend people or harm the company's image**
- ☑ Refrain from visiting indecent and offensive websites and websites unrelated to professional activities**

#### 4.3 - Customer Relations

For further information, please refer to the management system operating procedures.

##### 4.3.1 - Impartiality

The company is committed to offering its products and services without any discrimination between private clients or potential allowance holders with particular attention to the latter.

##### 4.3.2 - Contracts and Customer Communications

Contracts and customer communications by the company must always be:

- **Clear and simple, written in language as close as possible to that typically used by the parties**
- **In compliance with current regulations and not entail evasive or otherwise improper practices**
- **Comprehensive, so as not to neglect any relevant elements for the customer's decision**

##### 4.3.3 - Staff Behavior with Clients

The behavior of company personnel with clients is characterized by openness, respect and courtesy, with a focus on a collaborative and highly professional relationship.

##### 4.3.4 - Data Processing

In the processing of customers' personal data, the organization complies with the provisions of European Regulation 679/2016.

A privacy policy is provided that identifies:

- **Purposes and methods of processing**
- **Any recipients to whom the data is communicated**
- **Information required to exercise the right of access as per Article 15 of the GDPR**

In cases where regulations require this, individuals are asked for specific consent for the processing of their personal data; any investigation into clients' ideas, preferences, personal tastes and, in general, their privacy, is prohibited.

Personnel are required to process data with the utmost discretion and confidentiality, especially as regards internal matters. The same procedure is applied for the electronic management of information and personal data.

#### 4.4 - Relations with Suppliers

Please refer to the management system's procedures for further information.

##### 4.4.1 - Supplier Selection

The purchasing processes are important:

- **In the search for maximum competitive advantage for the company**
- **In granting equal opportunities to suppliers**
- **In loyalty**
- **In impartiality**

The selection of suppliers and the determination of purchase conditions are based on an objective assessment of quality, price, the actual availability of goods or services and guarantees of assistance and punctuality.

The exclusion of suppliers who are currently subject to criminal proceedings from contracts or other Mafia-related matters is an additional criterion for selection.

##### 4.4.2 - Honesty and Independence in Relationships

Relationships with suppliers, including those related to financial and consulting contracts, are constantly monitored by the company.

The signing of a contract with a supplier must always be based on relationships of extreme clarity, avoiding, where possible, forms of dependence.

Documents exchanged with suppliers must be appropriately archived, with special attention to accounting documents, which must be retained for the periods established by current regulations.

#### 4.5 - Relations with the Public Administration

The company's relationships with the public administration are dealt with in this section.

##### 4.5.1 – Fairness and Loyalty

The company intends to conduct relations with the public administration with utmost transparency and ethical behavior. These relationships must comply with current regulations and general principles of fairness and loyalty to avoid compromising the uprightness of both parties.

##### 4.5.2 - Gifts and Benefits

No person in the company can offer money or provide economic advantages or other types of benefits to members of the public administration to obtain contracts or other personal advantages or advantages for the company.

Any form of gift that can be interpreted as exceeding normal commercial courtesy or practice or aimed at obtaining preferential treatment in any activity related to the company is forbidden.

A "normal commercial courtesy or practice" is considered a gift with a value of less than €100.00.

Specifically, any form of gift to Italian and foreign public officials or their relatives that could influence their judgment to obtain more favorable treatment, undue benefits or various advantages is prohibited.

A gift is defined as any kind of benefit, not just material goods but also, for example, free participation in conferences, training courses, promises of job offers, etc.

The above cannot be circumvented through third parties. In this regard, corrupt acts are considered not only illegal payments made directly to the authorities or their employees but also illegal payments made to people acting on behalf of same.

On occasions such as celebrations and holidays, the giving of small gifts is allowed, subject to limits set by the Board of Directors or the General Management and to adequate documented communication to the Supervisory Body (OdV) to allow for the necessary checks to be made.

If an individual in the company receives explicit or implicit requests for benefits from a public official, they must immediately inform the Board of Directors or the person to whom they are required to report for appropriate control and action.

#### 4.6 - External Relations

This section provides information about the company's external relations.

##### 4.6.1 - External Effectiveness of the Code of Ethics

Anyone acting on behalf of the company who comes into contact with third parties with whom the organization intends to forge business relationships or is required to have institutional, social, political or any other type of relationship, is obliged to:

- **Inform these parties of the commitments and obligations set forth by the Code of Ethics**
- **Demand compliance with the obligations of the Code of Ethics in the performance of their activities**
- **Take the necessary steps in the case of refusal by third parties to comply with the Code of Ethics or partial fulfilment of the commitment to observe the provisions of the Code of Ethics, informing General Management or its delegates and the OdV.**

##### 4.6.2 - Conflict of Interest

All recipients must ensure that every decision made in the course of their activities is made in the interest of the company.

All recipients are required to avoid any personal interest or situation that may represent, or potentially represent, a conflict between their interests and those of the organization and, in any case, must comply with the specific procedures adopted by the company.

All recipients of the Code of Ethics must refrain from benefiting from their relationship with the company to promote themselves or third parties at the expense or disadvantage of the organization.

Employees are prohibited from participating, directly or indirectly, in any commercial ventures that directly compete with the company unless such participation has been previously communicated to and approved by the Board of Directors, after hearing the opinion of the OdV.

If situations of conflict of interest are identified, both in and outside the company's activities, each party involved is required to refrain from implementing the behavior representing the conflict of interest and promptly notify the OdV, which assesses the possible incompatibility or damage, on a case-by-case basis.

#### 4.6.3 - Competitive Practices

It is of paramount importance for the company that the market be based on fair and honest competition.

The company is committed to scrupulously observing the laws in this regard and cooperating with market regulatory authorities. Specifically:

- **It undertakes to carry out activities in compliance with the intent of law for supply contracts with public entities, including economic entities and companies with public participation**
- **It competes fairly in the market, respecting the rules of competition**
- **It undertakes to provide accurate information about its activities, both internally and externally or in response to legitimate requests**
- **It ensures the accuracy and correctness of data in financial statements, reports and other official documents**

#### 4.6.4 - Gifts and Benefits

Please refer to section 4.5.2 above for details.

#### 5.1 – Organizational Principles

The company ensures that the organizational system is based on the criterion of separation between the decision maker, the executor and those who control. In particular, the organization makes all operations verifiable because they are recorded.

The company binds those who perform the audit function to the truthfulness and correctness of data and information.

Each operation and/or activity must be lawful, authorized, consistent, documented and verifiable, in accordance with the principle of traceability and company procedures according to the criteria of prudence and to protect the corporate interests.

Company procedures must allow for controls to be carried out on transactions, authorization processes and on the execution of the transactions themselves.

Any collaborator who carries out transactions having as their subject sums of money, goods or other assets economically verifiable as belonging to the company must reasonably provide appropriate evidence in order to enable the control of such transactions.

#### 5.2 – Transparency of the Accounts

The company's accounts comply with the generally accepted principles of truthfulness, accuracy, completeness and transparency of the data recorded.

The recipients of this Code of Ethics undertake to refrain from any behavior, whether active or omissive, that directly or indirectly violates the regulatory principles and/or the internal procedures concerning the preparation of accounting documents and their external representation.

The recipients of this Code of Ethics are also obliged to store and make available, for each transaction completed, appropriate supporting documentation to ensure:

**Accurate book-keeping**

**Immediate identification of the characteristics and underlying reasons**

**Easy formal and chronological reconstruction**

**Control of the decision-making, authorization and implementation process, in terms of legitimacy, coherence and congruity as well as identification of the various levels of responsibility**

Recipients of this Code of Ethics who become aware of cases of omission, falsification or negligence in accounting records or supporting documents are required to promptly report them to their superior or to the Supervisory Board and/or the General Management.

The Company promotes training and refresher courses in order to inform the recipients of this Code of Ethics of the rules (laws or regulations, internal provisions, provisions of trade associations) that govern the formation and management of accounting documents.

### 5.3 - Checks and Controls

The company guarantees its willingness, through the competent persons, to provide all the information and the vision of the documents, and necessary requests to the auditing and control bodies.

The company guarantees access to all the information and documents to the entitled persons and provides, through the Board of Directors and employees responsible for their function, all the information that facilitates the exercise of supervisory functions.

The organisation prohibits the Board of Directors and employees and/or collaborators from making false declarations or presenting false documents certifying untrue situations, including through computer systems, with the aim of unduly receiving public funds and/or obtaining and maintaining possible benefits.

#### 5.3.1 - Supervision of the Implementation of the Code of Ethics

The task of verifying implementation and application of the Code of Ethics lies with:

- **The Board of Directors**
- **The Supervisory Body: this body, in particular, in addition to monitoring compliance with the Code of Ethics, having access to all the company's sources of information for this purpose, suggests appropriate updates to the Code itself, also on the basis of reports received from staff**

The Supervisory Body is responsible for the following tasks:

- **Communicate the reports received on violations of the Code of Ethics to the General Management for the adoption of appropriate measures**
- **Express binding opinions on the review of the most relevant policies and procedures in order to ensure coherence with the Code of Ethics**
- **Contribute to the periodic review of the Code of Ethics: to this end, the Supervisory Body formulates appropriate proposals for the Board of Directors, which assesses them and, if necessary, approves and formalises them**

The Supervisory Body maintains the requirements of autonomy and independence, assumes powers of investigation and control as well as powers of initiative for the performance of the functions assigned.



### 5.3.2 - Reporting Problems or Suspected Violations

Any violations of the Code of Ethics committed by recipients are subject to the disciplinary system envisaged by the company's Model 231.

Indeed, it should be noted that in the event of violations of the Code of Ethics, the company will take action against those responsible for such violations where deemed necessary to protect the interests of the organization; these disciplinary measures may go as far as expulsion from the company of those responsible, in addition to compensation for any damages deriving from the violations.

Failure to comply with the provisions of the Code of Ethics by members of the corporate bodies may lead to the adoption by the competent corporate bodies of the most appropriate measures provided for and permitted by law.

Violations of the rules of the Code of Ethics by employees represent a breach of the obligations arising from their employment, with all contractual and legal consequences, also with reference to the nature of the same as a disciplinary offence.

Violations committed by suppliers and external collaborators will be punished in accordance with the provisions of the relevant contractual assignments, without prejudice to more significant violations of law.

Special attention is paid to the processing of computerized data using internal systems: any problems and suspected violations must be immediately reported to the Head of IT Services and/or General Management for appropriate action.

### 5.3.3 - Disciplinary measures resulting from violations

The provisions of this Code of Ethics are an integral part of the contractual obligations undertaken by personnel as well as by persons having business relations with the company.

Violation of the principles and conduct set out in the Code of Ethics compromises the relationship of trust between the company and the perpetrators of the violation, whether they be directors, employees, consultants, collaborators, customers or suppliers.

Please refer to Model 231 adopted by the company for details about the disciplinary system and sanctioning mechanisms.

In general, violations will be prosecuted as follows:

- **With regard to employees (including members of corporate bodies and the Supervisory Board itself) with appropriate disciplinary measures, regardless of the possible criminal relevance of the conduct and the start of criminal proceedings in cases where the conduct represents a crime. Specifically, sanctions will comply with the rules and logic of the employment contract applied. Disciplinary measures range from a warning or reprimand to suspension without pay, demotion and, in the most serious cases, dismissal. Before a disciplinary measure is taken, the person concerned shall be given the opportunity to explain his or her behaviour**
- **As regards consultants, collaborators, customers, suppliers and other subjects having a contractual relationship with the company, specific procedures for terminating such relationship will be activated**

The above without prejudice to any compensation for damages that the company may suffer as a result of the violation by the above-mentioned subjects of the provisions of the Code of Ethics.

#### 5.4 - Public service assignment

The company acts as follows in the case of public service assignments:

- **Respect for the principles of impartiality, typical of the Public Administration**
- **Non acceptance of benefits or money**
- **Non acceptance of illegitimate influence from third parties**
- **Avoidance of conflicts of interest of the assigned personnel**

#### 5.5 - Confidentiality

The recipients are required to observe utmost confidentiality of information, documents, studies, ventures, projects, contracts, known for the services performed.

The company implements measures to protect the information managed and prevent it from being accessed by unauthorised personnel.

#### 5.6 - Dissemination, communication and training

This Code of Ethics is brought to the attention of all internal and external parties concerned or otherwise involved in the company's mission by means of appropriate communication and training activities.

#### 5.7 - Operating procedures and decision-making protocols

This Code of Ethics is an integral part of and implements the Model 231 adopted by the company for the purpose of preventing offences committed in the interest or to the advantage of the organization itself by the parties indicated in Legislative Decree 231 of 8 June 2001.

In order to prevent violations of the regulations in force, as well as of the Code of Ethics itself, the company envisages the adoption of specific procedures by all those involved in the operational process, aimed at identifying the persons responsible for the decision-making, authorization and performance processes.

#### 5.8 – Delegations system

Apart from the persons already qualified (General Management), the company uses a system of proxies based on which certain activities can only be performed by people expressly authorized to do so because they have been vested with powers by means of a specific official proxy and/or power of attorney.

Indeed, individual operations must be carried out in the various stages by different individuals whose responsibilities are clearly defined and known within the organization so as to avoid the allocation of unlimited or excessive powers to individual subjects.

#### 6.1 - Conflicts with the Code of Ethics

In cases where even one of the provisions of this Code of Ethics conflicts with the provisions set forth in internal regulations or procedures, the Code of Ethics will prevail over any of these provisions.

#### 6.2 - Approval process and amendments

This Code of Ethics was approved by the company's Board of Directors on the following date, corresponding to its drafting.

Date of approval Code of Ethics 20.11.2020



	Code of Ethics
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Any changes and/or supplements to this Code of Ethics will be approved by the Board of Directors following consultation with the Supervisory Body and promptly disseminated to all recipients of the same, in particular:

- **The Supervisory Body periodically reviews the Code of Ethics to take into account intervening legislative or corporate changes and proposes amendments and/or additions**
- **The Board of Directors reviews the Supervisory Body's proposals and resolves accordingly, making the approved changes immediately operational**