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CODE OF ETHICS

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1 INTRODUCTION

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

In full harmony with the positions expressed and protected by the accreditation system to which it adheres, the organisation is aware that it contributes with its work, with a sense of responsibility and moral integrity, to the development process of the Italian economy and the civil growth of the country.

The company believes in the value of work and considers legality, fairness and transparency of action to be essential prerequisites for achieving its economic, production and social objectives.

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

The Code of Ethics also aims to introduce and make binding for the company the principles and rules of conduct relevant for the reasonable prevention of the offences indicated in Legislative Decree no. 231/2001.

The Code of Ethics, considered as a whole and together with all specific implementation procedures approved by the company, is considered an integral part of existing and future employment contracts, pursuant to Article 2104 of the Civil Code (Diligence of the employee).

Violation of its provisions will therefore constitute an offence of a disciplinary nature and, as such, will be prosecuted and sanctioned by the company pursuant to and for the purposes of Article 7 (Disciplinary Sanctions) of Law no. 300/1970 (Workers' Statute - Rules on the protection of the freedom and dignity of workers, trade union freedom and trade union activity in the workplace and rules on employment) and may entail compensation for damages caused to the organisation.

With regard to collaborators, consultants and self-employed workers (specified below among the addressees) who perform their activities in favour of the company and other third parties, the signing of this Code of Ethics or of an extract from it or, in any case, the adherence to the provisions and principles set out therein, represent a *conditio sine qua non* for the stipulation of contracts of any nature between the company and such subjects. The provisions thus undersigned or, in any case, approved, even by conclusive facts, constitute an integral part of the contracts themselves.

In view of the foregoing, any violations by the persons referred to in the preceding paragraph of specific provisions of the Code of Ethics, depending on their seriousness, may legitimise the termination by the company of existing contractual relations with said persons and may also be identified *ex ante* as causes for the automatic termination of the contract pursuant to Article 1456 of the Civil Code (express termination clause).

1.1 Addressees of the company's Code of Ethics

By adopting the Code of Ethics, the company intended to define moral values, clear rules and procedures to which to conform.

The Code of Ethics is aimed at:

- ✓ **Members of collegiate bodies;**
- ✓ **Employees (both fixed-term and permanent);**
- ✓ **Project collaborators;**
- ✓ **External and internal consultants;**
- ✓ **Suppliers of goods and services;**
- ✓ **Any other person who may act in the name of and on behalf of the company either directly or indirectly, permanently or temporarily, or those who establish relations or relationships with the company and work to pursue its objectives.**

The addressees of this Code of Ethics are required to learn its contents and comply with its precepts.

The Code of Ethics will be made available to them, as specified below.

The Management, or a delegate, of the company is responsible for the effective implementation of the Code of Ethics and its dissemination inside and outside the organisation.

Company employees, in addition to compliance per se with current regulations and the provisions of collective bargaining agreements - where applicable -, undertake to adapt the manner in which they perform their work to the purposes and provisions of this Code of Ethics.

This is true both in intra-company relations and in relations with parties outside the company and, in particular, with public administrations and other public authorities.

An essential requirement of any profitable relationship with the company is compliance by the other addressees with the principles and provisions contained in this Code of Ethics.

To this end, when entering into contracts or agreements with other addressees, the company provides its interlocutors with a copy of this document.

1.2 Foreword

The principles listed below are considered fundamental, so our organisation is committed to respecting them towards everyone.

It is, however, essential that these values do not remain mere utterances but are translated into conduct and behaviour that is immanent to the company.

As an organisation and as individuals, all recipients in the working environment are expected to apply them correctly in both internal and external operations and relationships.

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

1. Integrity in compliance with laws and regulations;
2. Repudiation of all discrimination;
3. Centrality, development and valorisation of human resources and equity of authority;
4. Territorial rootedness;
5. Transparency and business ethics;
6. Quality;
7. Diversity;
8. Legality and the fight against terrorism and crime;

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

1.3 Integrity of conduct and compliance with laws and regulations

The company is committed to realising and providing quality services and to competing on the market according to principles of fair and free competition and transparency, maintaining fair relations with all public, governmental and administrative institutions, citizens and third party companies.

Each person is expected to act, in any situation, with integrity, transparency, consistency and fairness, conducting every business relationship with honesty.

The company operates in strict compliance with the Law and ensures that all personnel act accordingly: people must behave in accordance with the Law, whatever the context and the activities carried out and wherever they work.

This commitment must also apply to consultants, suppliers, customers and anyone who has dealings with our organisation.

The company will neither initiate nor continue any relationship with those who do not wish to align themselves with this principle.

1.4 Repudiation of all discrimination

In decisions affecting relations with stakeholders (personnel management and work organisation, selection and management of suppliers, relations with the surrounding community and its representative institutions), our organisation avoids any discrimination on the basis of age, gender, sexuality, health status, race, nationality, political opinions and religious beliefs of its stakeholders.

1.5 Centrality, development and valorisation of human resources. Fairness of authority

The company recognises the centrality of human resources and believes that an essential success and development factor is the professional contribution of its people.

The company has always placed the professionalism and individual contribution of its people at the centre of its work, giving continuity to a style of relationship that aims to recognise the work of each person as a fundamental element of corporate and personal development.

At the same time, the company places dialogue, the exchange of information - at whatever level -, the enhancement and professional development of its employees and the establishment of a corporate identity and sense of belonging at the centre of its daily work.

This value translates:

- ✓ **In the creation of a working environment that enhances the contribution and potential of the individual through the gradual empowerment of staff**
- ✓ **In the realisation of a relationship system that privileges teamwork over hierarchical relationships**
- ✓ **In the daily effort to share skills and knowledge also through the use of innovative systems**

The company attaches the utmost importance to those who work within its organisation, contributing to its development, as it is through human resources that the company is able to provide, develop, improve and guarantee optimal management of its services.

Without prejudice to legal and contractual provisions on workers' duties, employees are required to be professional, dedicated to their work, loyal, cooperative, mutually respectful, and have a sense of belonging and morality.

In the management of contractual relationships involving the establishment of hierarchical relations, our company undertakes to ensure that authority is exercised fairly and correctly and that all forms of abuse are avoided: in particular, the company ensures that authority does not turn into the exercise of power detrimental to the dignity and autonomy of the person.

These values must in any case be safeguarded when making choices about the organisation of work.

1.6 Territorial rootedness

The company's aim is to implement projects aimed at directly involving citizens, public and private institutions, businesses and associations in everything concerning health education, prevention and taking care of one's own wellbeing. The company is active and will continue to take steps to ensure that the realities collaborating with it comply with the same behavioural regulations and orient their activities towards the same principles and values.

It also promotes local development through a strong connection with the various actors in the local community. It acts, therefore, in the local community for the development of a rich and generative society, capable of recognising and enhancing the resources that make it up, the skills and potential present, the gender, cultural and ethnic differences, promoting wellbeing, integration and social development and enhancing the recognition of these by the users and those who materially offer the service.

1.7 Transparency and business ethics

The organisation's history, identity and values are embodied in a business ethic based on:

- ✓ **Reliability**
intended as a guarantee of absolute seriousness in the projects launched, the transactions and the commitments made;
- ✓ **Solidity**
relating to an institution that has a definite asset base, as evidenced by its long-standing activity;

- ✓ **Transparency**
consequent to the conception of the social role that requires not only the respect of principles and ethical work but also the implementation of modalities that allow the communities of reference and social actors to have the information to be able to reconstruct their work;
- ✓ **Fairness in contractual matters**
avoiding that, in existing relations, anyone acting in the name and on behalf of the company tries to take advantage of contractual gaps or unforeseen events in order to renegotiate the contract for the sole purpose of exploiting the position of dependence or weakness in which the interlocutor has found himself;
- ✓ **Protection of competition**
refraining from collusive, predatory behaviour and abuse of position.

1.8 Quality

Quality is a hallmark of our company. The organisation is committed to and responsible for ensuring quality in every activity, consistent with its long-term strategy.

The activities are implemented by the company through a set of processes managed through a quality management system that offers uniformity, transparency and service improvement to the outside world.

1.9 Diversity

The company demands that its directors, employees and collaborators behave in such a way as to ensure absolute respect for the dignity of persons:

- ✓ It guarantees the most scrupulous observance of regulations protecting child labour and child labour, and the freedoms and rights of workers;
- ✓ It guarantees the conditions for free membership of trade unions;
- ✓ It does not tolerate human rights violations;
- ✓ It promotes integration in the complex social fabric as a form of collective enrichment.

In particular, the company condemns any form of discrimination on the basis of age, gender, sexuality, health status, race, nationality, political opinions and religious beliefs.

1.10 Legality and combating terrorism and crime

The company believes deeply in democratic values and condemns any activity that may have the purpose of terrorism or subversion of the democratic order.

The organisation also condemns any activity that involves:

- ✓ Forgery, counterfeiting, counterfeiting and/or spending of money, public credit cards and stamps;
- ✓ Acceptance and processing of proceeds from criminal activities (money laundering);
- ✓ Unauthorised access to external computer systems;
- ✓ Unauthorised possession of access codes;
- ✓ Damage to equipment and data;
- ✓ Fraud in the handling of electronic signature certification;
- ✓ Wiretapping, Obstruction and Interruption of Computer Communications;
- ✓ Spreading ideas of tolerance and omertà related to drug use or any addictive substance;
- ✓ Incitement to commit unlawful acts or acts contrary to the moral sense;
- ✓ Negligence in combating violence, damage to public property and compliance with internal regulations.

2 SOCIAL ACTORS

2.1 Customers

It is the company's primary objective to fully satisfy the needs of its customers.

Within this framework, the organisation ensures the best execution of the tasks entrusted to the customer and is constantly oriented towards proposing increasingly advanced and innovative solutions with a view to integration, effectiveness, efficiency and cost-effectiveness.

The company provides accurate, complete and truthful information so that the customer can make a rational and informed decision. It protects the privacy of its customers in accordance with the relevant regulations, and undertakes not to communicate or disseminate their personal data, without prejudice to legal obligations.

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

2.2 Financial institutions

The organisation maintains relations with financial institutions based on fairness and transparency, with a view to creating value for the company itself.

For this, financial institutions are chosen on the basis of their reputation, including for their adherence to values comparable to those expressed in this Code of Ethics.

2.3 Suppliers

2.3.1 Suppliers of goods and services

The company establishes collaborative relationships with its suppliers, in compliance with the regulations in force and the principles of this Code of Ethics, paying attention to the best professional standards, best practices in ethics, health and safety protection and respect for the environment.

2.3.2 Internal and external consultants

Consultants are chosen on the basis of professionalism and reputation as well as reliability and adherence to values comparable to those expressed in this document.

Relations with consultants are based on transparent agreements and a constructive dialogue aimed at achieving common goals, consistent with the regulations and principles of this Code of Ethics.

2.4 Public administration

The term Public Administration refers to any person, subject, interlocutor qualifying as a Public Official or Person in Charge of a Public Service operating on behalf of the central or peripheral Public Administration, or of Public Supervisory Authorities, Independent Authorities, Community Institutions as well as private partners who are concessionaires of a Public Service.

The company inspires and adapts its conduct, in relations with the Public Administration, to the principles of fairness and honesty. On this basis, the persons entrusted by the company to follow any negotiation, request or institutional relationship with the Public Administration, whether Italian or foreign, must not for any reason seek to improperly influence its decisions nor engage in unlawful conduct, such as offering money or other benefits, that may alter the impartiality of the Public Administration representative's judgement.

The persons entrusted by the company organisation with the management of relations with any authority of the Public Administration must verify that the information provided in any way and for any reason is true, accurate and correct. The only persons allowed to have direct contact with the Public Administration on behalf of the company are those expressly designated by the company for this purpose.

No other employee may have any relationship whatsoever with the public administration for activities related to the company's corporate purpose.

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When carrying out tenders, the parties appointed by the company must comply with the law and the relevant regulations.

2.4.1 Labour relations with former public administration employees.

The recruitment of former employees of the Public Administration who in the course of their duties have had relations with the company or their relatives and/or relatives-in-law, takes place in strict compliance with the standard procedures defined by the organisation for personnel selection.

The establishment of other employment and/or consultancy relationships with former employees of the public administration or their relatives and/or relatives-in-law also takes place in strict compliance with standard procedures.

2.4.2 Grants and financing

Contributions, subsidies or funding obtained from the European Union, the State or another public body, even if of small value and/or amount, must be used for the purposes for which they were requested and granted.

The company prohibits the addressees 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 granted.

Similarly, in the event of participation in public tenders, the addressees of this Code of Ethics are required to operate in compliance with the law and proper business practice, avoiding in particular inducing public authorities to operate unduly in favour of the company.

The organisation is committed to preventing acts that lead the addressees of this Code of Ethics to perform actions that could procure unlawful advantages.

The use of altered or falsified declarations or documents or the omission of information or, in general, the use of artifices or deception, aimed at obtaining concessions, authorisations, financing, contributions from the European Union, the State or another Public Entity, also constitutes unlawful conduct.

2.5 Public supervisory authorities

The company consults in a transparent manner with all political forces, associations in the area and public institutions (territorial and national) in order to duly represent its positions on topics and issues of interest.

2.6 Political forces, associations and interest-bearing institutions

The addressees of this Code of Ethics undertake:

- ✓ To scrupulously observe the provisions issued by the competent institutions or public supervisory authorities for compliance with the regulations in force in the sectors related to their respective areas of activity;
- ✓ No applications or requests containing untrue declarations are submitted in the context of investigations with Public Supervisory Institutions and/or Authorities in order to obtain public grants, contributions or subsidised loans or to unduly obtain concessions, authorisations, licences or other administrative acts;
- ✓ To comply with any request from the above-mentioned institutions or authorities within the scope of their respective supervisory functions, providing - where requested - full cooperation and avoiding obstructive behaviour.

3 PRINCIPLES OF STAFF BEHAVIOUR

3.1 Professionalism

Each person performs his or her work and services with diligence, efficiency and fairness, using the tools and time at his or her disposal to the best of his or her ability and assuming the

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responsibilities associated with performance.

3.2 Loyalty

People are expected to be loyal to the company.

3.3 Honesty

Within the scope of their work, the company's people are required to know and diligently respect the 231 Organisational Model and the laws in force. Honesty represents the fundamental principle for all the company's activities and initiatives and constitutes an essential value of organisational management. Relations with stakeholders, at all levels, must be marked by criteria and conduct of fairness, cooperation, loyalty and mutual respect. In no case may the pursuit of corporate or personal interest justify dishonest conduct.

3.4 Legality

The organisation is committed to complying with all national and international standards, laws, directives and regulations and all generally recognised practices. Furthermore, it inspires its decisions and conduct with the care of the public interest entrusted to it.

3.5 Fairness and transparency

Individuals shall not use for personal purposes any information, goods and equipment at their disposal in the performance of their assigned function or task. Each person shall not accept or make for him/herself or for others any pressure, recommendation or report that could be detrimental to the company or bring undue advantages to him/herself, the company or third parties. Each person rejects and does not make promises of undue offers of money or other benefits. The company is committed to operating in a clear and transparent manner, without favouring any interest group or individual.

3.6 Confidentiality

People ensure the utmost confidentiality with regard to news and information constituting the company's assets or inherent to the company's business, in compliance with the provisions of the law, current regulations and Internet procedures. Moreover, the company's people are required not to use confidential information for purposes unrelated to the performance of their duties.

3.7 Responsibility towards the community

The company, aware of its social role on the reference territory, on economic and social development and on the general wellbeing of the community, intends to operate in respect of the national and local communities, supporting initiatives of cultural and social value in order to improve its reputation and legitimacy to operate.

3.8 Resolution of conflicts of interest

In carrying out their work, persons shall pursue the general objectives and interests of the company. They shall inform their superiors or contacts without delay of situations or activities in which there might be an interest in conflict with that of the company, on the part of the persons themselves or of their close relatives, and in any other case in which there are relevant reasons of convenience. Persons shall respect the decisions taken by the company in this regard.

3.9 Sense of belonging

People pursue, in the performance of their work activities, everything that does not hinder or prejudice in any way the creation of a sense of belonging of people to their organisation, work group or to third parties.

3.10 Mutual respect

People pursue, in the performance of their work activities, everything that does not hinder or prejudice in any way the creation of a sense of belonging of people to their organisation, work group or to third parties.

3.11 Specific Obligations

Company employees must follow the instructions given:

✓ **Transparency**

It is a good rule that all information concerning the activities carried out within the company is within everyone's reach.

Each employee is responsible for liaising with his or her supervisor and colleague with regard to the work he or she carries out.

In the event of misunderstandings or problems, it is the duty of everyone to first contact their supervisor or contact person.

Behave in a scrupulously loyal manner and independently of any conditioning of any kind that might influence its actions both towards its own Principal and towards external Organisations in relations with them.

Do not engage in improper economic relations or accept gifts of value or favours of any kind from organisations, suppliers of one's principal.

Report, at the time of acceptance of the professional assignment or during its performance, any relationship or interest in common with external Organisations having relations with its Principal that may lead to conflicts of interest.

✓ **Consistency**

Once a commitment is made, one completes it. Never leave a job unfinished and never take on commitments you already know you will not be able to fulfil.

✓ **Courtesy and kindness**

Courtesy and kindness are and must be the basis of every day-to-day activity, they must also be a constant in interpersonal relationships both inside and outside the company.

✓ **Punctuality**

If you are late for an appointment, it is a good rule to give notice before the agreed time expires; to do so afterwards is rude. Punctuality is a form of respect for those who are waiting for us.

✓ **Confidentiality**

All information and data handled in the workplace are company property and confidential, and must be treated as such. In particular, one should never discuss work-related problems or situations in public places where one can be overheard, or in the presence of people who do not have a right to be involved in the information.

✓ **Professionalism**

Being professional means knowing all the appropriate behaviours, all that is needed to do one's job in the best possible way, taking into account the needs of customers and the company. Whichever activity you perform, you must always be professional.

✓ **Working environment**

Everyone should have the ability to understand the phenomena underlying interpersonal relations and adopt a behaviour consistent with the context of reference, always trying to maintain a courteous, cordial and cooperative climate with their colleagues.

✓ **Loyalty and corporate respect**

It is everyone's duty to share company policies and to ensure that they are adhered to. During day-to-day business, each employee should always preserve the interests and image of the company, and have the utmost respect for company property. While carrying out one's activity, one should always assess the economic implications of one's choices and avoid waste.

✓ **Respect for the customer**

The company, like all companies in a free market, lives thanks to its customers. Respect, kindness and courtesy should be a constant in the relationships of those who make contact with the organisation.

✓ **Workstation**

Each employee is responsible for his or her own workplace. Each person is responsible for the care and cleanliness of the tools at his or her disposal.

✓ **Personal computers and hardware equipment**

The personal computers and hardware equipment (tablet telephones, etc.) provided must be kept in the best possible condition and no programmes other than those provided for in the company configuration may be installed. The hardware equipment provided by the company constitutes to all intents and purposes working tools and may not be used for personal purposes. In particular, the files they contain constitute company property and may not be arbitrarily damaged and/or destroyed.

The use of hardware equipment for copying and/or storing files and data, such as USB mass memories, laptops, optical discs, burners and any other electronic storage media, is strictly prohibited, unless expressly authorised by the company.

✓ **Internet**

The Internet connection is a working tool and must be used as such.

Internet use for private purposes is only permitted outside working hours. Internet surfing:

- It is not permitted for those sites that do not directly relate to the performance of assigned duties, especially those that may reveal the employee's political, religious or trade union views;
- No financial transactions of any kind are permitted, including remote banking, on-line purchases and the like, except in cases directly authorised by the company and in compliance with normal purchasing procedures;
- Downloading and installing free (freeware), shareware, P2P and/or FTP software from Internet sites is not permitted, unless expressly authorised by the company;
- Any form of registration to sites whose content is not related to work is prohibited;
- Participation, for non-professional reasons, in forums, or the use of chat lines is not permitted. The storage of computer documents of an outrageous and/or discriminatory nature on grounds of sex, language, religion, race, ethnic origin, opinion and trade union and/or political affiliation etc. is not permitted.

✓ **Electronic Mail**

E-mails are a business tool and are not to be regarded as private correspondence and therefore:

- E-mails (internal and external) may not be used for reasons not related to the performance of assigned duties;
- It is not permitted to send or store messages (internal or external) of an insulting nature, discriminatory on grounds of sex, language, religion, race, ethnic origin, opinion or trade union and/or political affiliation, etc;
- It is not permitted to set up and use e-mail accounts outside the company.

✓ **Mobile phones**

The use of mobile phones has rules of good behaviour that should always be respected. Given that it is a business tool, the mobile phone should always be kept silent during meetings and encounters with customers, especially when on their premises. The use of mobile phones for personal purposes should be kept to a minimum and only in emergencies.

✓ **Company cars**

The company car is the total responsibility of the person to whom it has been assigned, and like all company property it should be used and maintained with the utmost care. It should be driven in full compliance with the requirements of the highway code. It is the responsibility of the driver assigned to the vehicle to take care of cleaning, maintenance and to ensure that the vehicle is always in top condition. Any fines arising from traffic violations are the responsibility of the driver.

✓ **Private cars**

The use of a private car for business purposes is envisaged, and as in the case of a company car, the driver must operate in full compliance with the requirements of the highway code. Any fines arising from traffic violations are the responsibility of the driver.

4 CONDUCT CRITERIA

The rules contained in this section are intended to indicate to the addressees of this Code of Ethics the attitudes and behaviour to be observed when carrying out the various company activities in accordance with the values that inspire this document.

All addressees of this Code of Ethics (identified in par. 1.1 of this document) must observe correct and transparent conduct in the performance of their duties, thereby contributing to the effectiveness of the internal control system for the protection of corporate value.

In compliance with the law, all addressees must maintain an attitude of helpfulness towards the corporate bodies and supervisory authorities.

4.1 Staff relations

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

✓ **Personnel Selection**

The assessment of staff to be recruited, or in collaboration, is carried out on the basis of the correspondence of the candidates' profiles with those expected and with internal requirements, respecting equal opportunities for all concerned. The information requested is strictly related to the verification of the aspects envisaged by the professional and psycho-aptitude profile, while respecting the candidate's privacy and opinions. In its selection activities, the General Management adopts appropriate measures to avoid favouritism and facilitations of any kind and makes a careful selection based not only on the mandatory aspects, but also on preferential aspects decided by the Board of Directors.

✓ **Establishment of the employment relationship**

Staff are hired under regular employment, professional service or internship contracts: no form of irregular employment is tolerated.

✓ **Integrity and protection of the person**

In personnel management and development processes, as well as in the selection phase, decisions made are based on the correspondence between expected profiles and the profiles possessed by people and/or on merit considerations. Access to roles and positions is based on skills and abilities. In addition, consistent with general work efficiency, forms of flexibility in work organisation are favoured that facilitate people on maternity leave as well as those who have to care for children.

✓ **Enhancement and training of resources**

The company provides people with information and training tools with the aim of enhancing their specific skills and preserving their professional value. There is institutional training, provided at certain times in the person's professional life (e.g.: an introduction to the activity is provided for new recruits) and recurring training aimed at operational staff (e.g.: training on safety in the workplace, on managing 231 and the code of ethics).

4.1.1 Health and Safety

The company is committed to providing a working environment that protects the health and safety of its staff by disseminating and consolidating a safety culture, developing risk awareness and promoting responsible behaviour by all personnel.

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

One of the main objectives is to protect human resources by constantly 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 the internal rules and procedures on risk prevention and health and safety protection and to promptly report any shortcomings or non-compliance with the applicable rules.

The company adopts the general measures for the protection of health and safety at work prescribed by law, with particular reference to the provisions of Legislative Decree 81/08 as amended. The organisation is committed to scrupulous compliance with all regulations concerning health and safety at work for employees, collaborators and users.

In particular:

- ✓ It defines the operational procedures to be followed and coordinates occupational health and safety activities;
- ✓ It ensures the application of current regulations also through the creation of risk assessment documents and the definition of working procedures in line with current safety standards;
- ✓ It constantly monitors legislative innovations and works towards their implementation.

The company also undertakes to ensure:

- ✓ The assessment of all health and safety risks;
- ✓ Prevention planning, aimed at a complex that coherently integrates operational conditions, as well as the influence of environmental factors and work organisation into prevention;
- ✓ The elimination of risks and, where this is not possible, their reduction to a minimum in relation to the knowledge gained from technical progress;
- ✓ Observance of ergonomic principles in the organisation of work, in the design of workplaces, in the choice of equipment and in the definition of working and service delivery methods, particularly with a view to reducing the health effects of monotonous and repetitive work;
- ✓ Reducing risks at source;
- ✓ Replacing what is dangerous with what is not or is less dangerous
- ✓ Limiting to a minimum the number of workers who are or may be exposed to the risk;
- ✓ The limited use of chemical, physical and biological agents in the workplace
- ✓ The priority of collective protective measures over individual protective measures;
- ✓ The health monitoring of workers;
- ✓ The removal of the worker from exposure to the risk for health reasons relating to his or her person and transfer where possible to another task;
- ✓ Adequate information and training for workers, managers, supervisors, the RLS and all personnel;
- ✓ Appropriate instructions to workers;
- ✓ The participation and consultation of workers and the RLS;
- ✓ The planning of measures deemed appropriate to ensure the improvement of safety levels over time, including through the adoption of codes of conduct and good practices;
- ✓ The emergency measures to be implemented in the event of first aid, fire fighting, evacuation of workers and serious and immediate danger;
- ✓ The use of warning and safety signs;
- ✓ The regular maintenance of rooms, equipment, facilities with particular regard to any safety devices in accordance with the respective manufacturers' instructions;

- ✓ Appropriate instructions to employees, collaborators and users and training for them in accordance with the law and the CCNL applied to personnel.

4.1.2 Protection of privacy

When processing the data of its staff, the company complies with the provisions of European Regulation 679/2016. People are given a privacy policy that identifies:

- ✓ Purposes and methods of processing;
- ✓ Possible subjects to whom the data are disclosed;
- ✓ Information necessary for the exercise of the right of access under Art. 15 of the GDPR.

Where regulations require it, individuals are asked for specific consent to process their personal data. Any investigation into the ideas, preferences, personal tastes and in general the private life of employees and collaborators is excluded.

The same procedure is also applied for the telematic management of information and personal data.

4.1.3 Environmental Protection

The organisation is committed to pursuing environmental protection through compliance with national and EU legislation and regulations.

It is committed to implementing pollution prevention and raising awareness of environmental issues among employees and collaborators.

4.2 Duties of personnel

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

People must act loyally in order to comply with the obligations entered into in the employment contract and the provisions of the Code of Ethics by ensuring the required performance.

4.2.1 Delegations and responsibilities

The duties, responsibilities and powers of directors, employees and collaborators are defined by means of specific resolutions and/or procedures.

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

4.2.2 Obligations of Heads of Departments towards the Code of Ethics

Each function head, identified as such in the organisational chart, job description and/or delegation system, is obliged to

- ✓ Ensure compliance with the Code of Ethics by those directly or indirectly subject to its responsibility;
- ✓ To set an example for one's employees/collaborators by one's behaviour;
- ✓ Ensure that employees understand that the provisions of this Code of Ethics form an integral part of their work performance;
- ✓ Promptly report to the General Management or any delegate or to the Supervisory Board any reports or special requirements by their subordinates.

Failure by department heads to comply with the obligations set out in this chapter may lead to the application of disciplinary sanctions, as provided for in the sanctions system

4.2.3 Obligations of all employees towards the Code of Ethics and the documents produced by the company

Each employee is required to be familiar with the provisions contained in the Code of Ethics or referred to therein, as well as with the reference laws governing the activities carried out within the scope of his or her function, which form an integral part of each employee's work

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performance.

Any employee who becomes aware of alleged unlawful conduct is obliged to communicate the information he/she has concerning such conduct only to his/her superiors or to the Supervisory Board and/or the General Management in the manner laid down in the internal system.

The Executive Board adopts monitoring systems on the actual reading and comprehension of the statutory documents by employees, collaborators, etc., by means of anonymous tests, activating the most appropriate actions to constantly increase the level of dissemination and comprehension of their contents.

Employees are also obliged to:

- ✓ Refrain from conduct contrary to these provisions and rules;
- ✓ Contact your superiors or the Supervisory Board and/or delegate responsible for managing the prevention model for the necessary clarifications on how to apply the Code of Ethics or the relevant regulations;
- ✓ Promptly report any news of possible violations of the Code of Ethics to at least one of the above-mentioned persons;
- ✓ Cooperate with the organisation in the event of any investigation aimed at verifying and possibly sanctioning possible violations.

These behavioural requirements are also required of external consultants and collaborators of all kinds

4.2.4 Protection of corporate assets

Each addressee is required to act diligently to protect corporate assets from improper or incorrect use.

People must be aware of and implement internal information security policies to ensure integrity, confidentiality and availability.

Information and know-how must be protected with the utmost confidentiality. The most significant data that the company acquires or creates in the course of its business must be considered confidential information and given appropriate attention: this also includes information acquired from and concerning third parties (customers, contacts, partners, employees, etc.).

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

Both during and after termination of the employment relationship with the company, persons may use confidential data solely in the interest of the company and never for their own benefit and/or that of third parties.

4.2.5 Confidential information on third parties

Company personnel shall refrain from using unlawful means to acquire confidential information about other organisations and third parties.

Persons who, within the framework of a contractual relationship, become aware of confidential information on other persons shall be obliged to use it exclusively for the purpose provided for in the contract in question.

Without due authorisation, persons may not request, receive or use confidential information about third parties. If you learn confidential information about another person that is not already subject to a non-disclosure agreement or other form of protection, you must contact your manager for assistance in handling such information.

4.2.6 Use of company assets

Each person is required to act with diligence in order to protect the company assets through responsible behaviour and in line with the operating procedures drawn up to regulate their use, accurately documenting their use.

In particular, each staff member must:

- ✓ Use the assets entrusted to him scrupulously and sparingly;
- ✓ Avoid improper use of company assets that may cause damage or reduced efficiency or are otherwise contrary to the company's interest;
- ✓ Properly guard the resources entrusted to him/her and promptly inform the units in charge of any threats or events detrimental to the company.

As far as computer applications are concerned, everyone is expressly required to

- ✓ Scrupulously adopt the company's security policies so as not to compromise the functionality and protection of IT systems;
- ✓ Refrain from sending threatening or insulting e-mail messages or using low-level language or making inappropriate comments that may cause offence to persons and/or damage the company's image;
- ✓ Refrain from surfing websites with indecorous and offensive content and in any case not related to professional activities.

4.3 Customer Relations

4.3.1 Impartiality

The company undertakes to satisfy its customers in fulfilment of the obligations set out in the relevant contract, the company also undertakes not to discriminate against its customers.

The company establishes a relationship with its customers that is characterised by a high degree of professionalism and is characterised by helpfulness, respect, courtesy, and the search for and offer of maximum cooperation.

4.3.2 Contracts and customer communications

Contracts and communications to customers by the company must always be:

- ✓ Clear and simple, formulated in language as close as possible to that normally used by interlocutors;
- ✓ Compliant with applicable regulations and such as not to constitute circumvention or otherwise unfair practices;
- ✓ Complete so as not to overlook any element relevant to the client's decision.

4.3.3 Style of staff behaviour towards customers

The style of conduct of the company's people towards customers is characterised by helpfulness, respect and courtesy, with a view to a collaborative and highly professional relationship using simple and comprehensible language and ensuring equal treatment of all customers.

4.3.4 Data processing

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

A privacy policy identifying:

- ✓ Purposes and methods of processing;
- ✓ Possible subjects to whom the data are disclosed;
- ✓ Information necessary for the exercise of the right of access under Art. 15 of the GDPR.

Where the law requires it, individuals are asked for specific consent to process their personal data; any investigation into the ideas, preferences, personal tastes and in general the private life of customers is excluded.

Personnel are obliged to handle data with the utmost discretion and confidentiality, especially towards internal staff; the same procedure is also applied to the telematic handling of information and personal data.

4.4 Relations with Suppliers

Please also refer to the management system procedures for further details.

4.4.1 Choice of supplier

Purchasing processes are important:

- ✓ Seeking maximum competitive advantage for the company
- ✓ To the granting of equal opportunities to suppliers
- ✓ To loyalty
- ✓ To impartiality

The selection of suppliers and the determination of purchasing conditions are based on an objective assessment of the quality, price of the good or service, its actual availability and guarantees of service and timeliness.

A further selection criterion is the exclusion of suppliers with ongoing criminal proceedings for procurement or other mafia-related matters.

4.4.2 Integrity and independence in relationships

Relations with suppliers, including those concerning financial and consultancy contracts, are constantly monitored by the company.

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

Documents exchanged with suppliers must be appropriately archived: in particular, those of an accounting nature must be retained for the periods stipulated by the regulations in force.

4.5 Relations with Public Administrations

This section deals with relations between the company and the public administration (PA).

4.5.1 Fairness and loyalty

The company intends to conduct relations with the PA with the utmost transparency and ethical behaviour. These relations, which must take place in compliance with the regulations in force, are informed by the general principles of fairness and loyalty so as not to compromise the integrity of both parties.

4.5.2 Gifts, free gifts and benefits

No person in the company may give money or offer financial or other benefits to PA persons for the purpose of obtaining assignments or other advantages for themselves or for the company.

No form of gift that may be construed as exceeding normal business or courtesy practices or otherwise aimed at acquiring favourable treatment in the conduct of any activity related to the company is permitted.

In this sense, a 'normal business practice or courtesy' of a value of less than €50.00 is considered a gift. In particular, any form of gift to Italian and foreign public officials or their family members that may influence their independence of judgement for the purpose of obtaining more favourable treatment or undue benefits or advantages of any kind is prohibited.

A gift means any kind of benefit: not only material goods but also, for example, free attendance at conferences, training courses, the promise of a job offer, etc.

The above cannot be circumvented by resorting to third parties. In this respect, not only unlawful payments made directly to entities or their employees but also unlawful payments made to persons acting on behalf of such entities are considered acts of corruption.

On festivities, anniversaries and/or holidays, donations of goods are permitted, provided that they are of a modest size and in any case within the limits decided by the Board of Directors or the General Management, subject to prior notification to the Supervisory Board, adequately documented in order to allow the appropriate checks.

If a person in the company, on the other hand, receives an explicit or implicit request for benefits from a member of the PA, he/she shall immediately inform the Board of Directors or the person to whom he/she is required to report for the adoption of appropriate checks and initiatives.

4.6 External Relations

This section deals with details of the company's external relations.

4.6.1 External effectiveness of the Code of Ethics

Anyone acting in the name and on behalf of the company who comes into contact with third parties with whom the organisation intends to enter into business relations, or is required to have institutional, social, political or any other kind of relations with them, is obliged to

- ✓ Inform them of the commitments and obligations imposed by the Code of Ethics;
- ✓ Demand compliance with the obligations of the Code of Ethics in the performance of their activities;
- ✓ Take the necessary initiatives in the event of refusal by third parties to comply with the Code of Ethics or in the event of failure or partial performance of the commitment undertaken to comply with the provisions contained in the Code of Ethics, informing the General Management or its delegates and the Supervisory Board.

4.6.2 Conflict of interest

All addressees must ensure that every decision taken in the context of their activities is taken in the interest of the company.

All addressees are required to avoid any activity or situation of personal interest that constitutes or may constitute, even potentially, a conflict between their own interests and those of the organisation and, in any case, shall comply with the specific procedures adopted by the company on the matter.

All addressees of the Code of Ethics must refrain from taking advantage of their relationship with the company in order to favour themselves or third parties to the detriment or disadvantage of the organisation itself.

It is forbidden for any employee to take part, directly or indirectly, in any capacity whatsoever, in business initiatives that are in direct competition with the company, unless such participation has been communicated in advance to the competent Board of Directors and approved by it, having heard the opinion of the Supervisory Board.

In the event that situations of conflict of interest, even if potential, are identified, whether internal or external to the Company's activity, each person involved is required to refrain from engaging in the conduct of conflict by promptly notifying the Supervisory Board, which is responsible for assessing the existence, case by case, of any incompatibility or prejudicial situations.

4.6.3 Competitive practices

It is of paramount importance to the company that the market is based on fair and equitable competition.

The company is committed to scrupulously observing the relevant laws and cooperating with the market regulatory authorities. In particular:

- ✓ It undertakes to carry out the activities in compliance with the rationale of the law for the supply of goods and services that are entrusted through express agreements with public entities, including economic entities and corporations with public participation;
- ✓ It competes fairly in the market by respecting the rules of competition;
- ✓ It undertakes to provide correct information about its activities both internally and externally or in response to legitimate requests;
- ✓ It ensures the truthfulness and correctness of corporate data in relation to financial statements, reports and other official documents.

4.6.4 Gifts and Benefits

See previous section. 4.5.2.

5 ENFORCEMENT MECHANISMS OF THE CODE OF ETHICS

5.1 Organisational Principles

The company ensures that the organisational system is based on the criterion of separation between those who decide, those who execute and those who control. In particular, the organisation makes all operations verifiable because they are recorded.

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

Every operation and/or activity must be lawful, authorised, consistent, documented, verifiable, in compliance with the principle of traceability and with company procedures according to the criteria of prudence and protection of company interests.

Company procedures must allow for controls to be carried out on operations, authorisation processes and the execution of those operations.

Any employee who carries out transactions involving sums of money, goods or other utilities that can be economically evaluated as belonging to the company shall reasonably provide appropriate evidence in order to allow the verification of such transactions.

5.2 Accounting Transparency

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

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

The addressees of this Code of Ethics are also required to keep and make available adequate supporting documentation for each operation or transaction carried out:

- ✓ **Accurate bookkeeping;**
- ✓ **The immediate identification of the underlying characteristics and motivations**
- ✓ **The easy formal and chronological reconstruction;**
- ✓ **The verification of the decision-making, authorisation and implementation process in terms of legitimacy, consistency and appropriateness as well as the 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 General Management.

The company promotes training and updating in order to make the addressees of this Code of Ethics aware of the rules (laws or regulations, internal prescriptions, provisions of trade associations) that govern the formation and management of accounting documents.

5.3 Checks and verifications

The company ensures the availability, through the competent persons, to provide all necessary information and viewing of documents, and requests to the audit and control bodies.

The company guarantees the accessibility of all information and documents to those entitled to them and provides, through the availability of its directors and employees, who are responsible for their function, all information that favours the exercise of supervisory functions.

The organisation prohibits its directors and employees and/or collaborators from making false declarations rather than submitting false documents or certifying untrue situations,

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including by means of computer systems, with the aim of unduly receiving public funds and/or obtaining and retaining possible benefits.

5.3.1 Supervision of the implementation of the Code of Ethics

The task of verifying the implementation and enforcement of the Code of Ethics falls to:

- ✓ **Board of Directors;**
- ✓ **General Management;**
- ✓ **Coordinators;**
- ✓ **Supervisory Body. This body, in particular, not only monitors compliance with the Code of Ethics, having access to all the company's information sources for this purpose, but also suggests appropriate updates to the Code, also on the basis of reports received from staff.**

The Supervisory Board is responsible for the following tasks:

- ✓ **Communicate reports of breaches of the Code of Ethics to the Executive Board for appropriate action;**
- ✓ **Express binding opinions on the revision of the most relevant policies and procedures to ensure consistency with the Code of Ethics;**
- ✓ **Contribute to the periodic review of the Code of Ethics: to this end, the Supervisory Board makes appropriate proposals to the Board of Directors, which assesses them and, if necessary, approves and formalises them.**

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

5.3.2 Reporting problems or suspected violations

Any violations of the Code of Ethics committed by the addressees are subject to the disciplinary system provided for in the company's Model 231.

It should be noted, in fact, that in the event of violations of the Code of Ethics, the company will take disciplinary measures against those responsible for such violations, where deemed necessary for the protection of the organisation's interests, which may go as far as the removal from the company of those responsible, in addition to compensation for any damages resulting from the violations.

Non-compliance with the rules 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 constitute a breach of the obligations arising from the employment relationship, with all contractual and legal consequences, also with reference to their relevance as a disciplinary offence.

Violations committed by suppliers and external collaborators shall be sanctioned in accordance with the provisions of the relevant contractual assignments, except for more serious violations of the law.

Particular attention is paid to the processing of computer data through internal systems: any problems and suspected breaches must be reported immediately to the Head of IT Services and/or the Executive Board for appropriate action.

5.3.3 Disciplinary measures resulting from violations

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

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

For details of the disciplinary system and sanction mechanisms, please refer to the Model

231 adopted by the company.

In general, violations will be prosecuted in the following terms:

- ✓ With regard to employees (including members of corporate bodies and the Supervisory Board itself) through appropriate disciplinary measures, regardless of the possible criminal relevance of the conduct and the institution of criminal proceedings in cases where the conduct constitutes a crime. In particular, 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 is given the opportunity to explain his/her behaviour;
- ✓ With regard to consultants, collaborators, customers, suppliers and other persons having contractual relations with the company, specific termination modalities will be activated.

This is also without prejudice to any compensation for damages that the company may suffer as a result of the violation by the above-mentioned persons of the provisions contained in the Code of Ethics.

5.4 Appointment from public service

The company applies the following conduct when performing public service activities:

- ✓ **Respect for the principles of impartiality, typical of public administration;**
- ✓ **Non-acceptance of benefits, money and utilities;**
- ✓ **Not accepting illegitimate influences from third parties;**
- ✓ **Avoid conflicts of interest of their appointees.**

5.5 Confidentiality

Recipients are required to observe strict confidentiality on information, documents, studies, initiatives, projects, contracts, known to them.

The company puts in place measures to protect the information it handles and prevent it from being accessed by unauthorised personnel.

5.6 Dissemination, Communication and Training

This Code of Ethics forms an integral part and constitutes the implementation of the 231 Model adopted by the company for the purpose of preventing offences committed in the interest or to the advantage of the organisation itself by the subjects indicated by Legislative Decree 231/01.

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 processes of decision-making, authorisation and performance of the operations themselves. This Code of Ethics is brought to the attention of all internal and external parties concerned or otherwise involved in the company's mission through appropriate communication and training activities.

5.7 Operational procedures and decision-making protocols

This Code of Ethics forms an integral part and constitutes the implementation of the 231 Model adopted by the company for the purpose of preventing offences committed in the interest or to the advantage of the organisation itself by the persons indicated in Legislative Decree no. 231/01.

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 processes of decision-making, authorisation and performance of the operations themselves.

5.8 Delegation system

Apart from the already qualified persons (General Management), the company uses a system of delegation on the basis of which certain activities can only be carried out by persons expressly authorised to do so because they have been granted the power by means of an official delegation and/or notarised power of attorney.

In fact, it is necessary that the individual operations are carried out in the various phases by different persons, whose competences are clearly defined and known within the organisation so as to avoid unlimited or excessive powers being attributed to individual persons.

6 FINAL PROVISIONS

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 of internal regulations or procedures, the Code of Ethics shall prevail over any of these provisions.

6.2 Approval Process and Amendments

This Code of Ethics was originally approved by the company's Board of Directors on the date indicated on the title page of this document.

Any variation and/or integration of this Code of Ethics shall be approved by the Board of Directors after consultation with the Supervisory Board and promptly disseminated to all the addressees thereof, in particular:

- ✓ The Supervisory Board periodically reviews the Code of Ethics for legislative or corporate changes and proposes amendments and/or additions;
- ✓ The Board of Directors examines the SB's proposals and resolves accordingly, making the approved changes immediately operational.