



MOG 231  
(pursuant to Italian Legislative Decree 8-6-2001, no. 231)

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## CODE OF ETHICS

### SECTION I – INTRODUCTION

#### RATIO

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1. This Code of Ethics expresses the company's own ethical principles which the company itself intends to cultivate in the belief that a company must be evaluated for the quality of products and services, but also and above all for the ability to produce value and values.
2. From this perspective, this Code of Ethics, if, on the one hand, it intends to set ethical *standards* of reference that guide and govern the conduct and actions of the company, on the other, reviews the rights, duties and responsibilities of the company towards the board of directors, shareholders, employees, collaborators, consultants, political organisations, trade unions, customers, suppliers, third parties and members of the supervisory body.
3. Again with this perspective, if all the recipients of this Code of Ethics (board of directors, shareholders, employees, collaborators, consultants, customers, suppliers, third parties and members of the supervisory body, etc.), none excluded, must comply with the requirements contained herein, in no way can the conviction of acting in the interest or for the benefit of the company justify the adoption of behaviour contrary to the same and/or to the requirements contained in the MOG 231.

#### SCOPE OF APPLICATION

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1. The requirements contained herein apply to all subjects (board of directors, shareholders, employees, collaborators, consultants, customers, suppliers, third parties and members of the supervisory body, etc.) who, according to principles of sound and prudent management, as well as in compliance with the laws, regulations and internal procedures, contribute to the company *mission*.

## SECTION II – GENERAL PRINCIPLES

### INTEGRITY, HONESTY, FAIRNESS AND LOYALTY

1. Integrity, honesty, fairness and loyalty are the cornerstone of corporate life.
2. The conduct and activities performed by the company/in the context of corporate life must be based on integrity, honesty, fairness and loyalty.
3. Respect for integrity, honesty, fairness and loyalty requires that the company takes action to promote and demand strict compliance with the internal laws, regulations and procedures.

### HUMAN RIGHTS AND INDIVIDUAL FREEDOMS

1. The company recognises and protects human rights.
2. The company protects individual freedoms.
3. The company protects/promotes the value of human resources in order, *first and foremost*, to maximise their satisfaction.
4. In this context, the company is committed to ensuring that all human resources can grow and increase their professional skills and competences in such a way as to disseminate them, thus also promoting the interchangeability of professional figures.
5. The company condemns any form of harassment/discrimination based on age, gender, health and racial conditions, political opinions and/or religious beliefs.
6. The company also condemns any form of incitement to commit acts of violence/of provocation for racial, ethnic and religious reasons, as well as any behaviour that supports, in whole or in part, the denial, minimisation or apology of the *Shoah*, genocide, crimes against humanity or war crimes.

### MINORS

1. The company recognises the primary importance of minors and, consequently, the repression of behaviours that could constitute crimes of a sexual nature to the detriment of minors.
2. Also from this perspective, it is forbidden to introduce pornographic material into the company's property, to hold pornographic material within the company's property, as well as to use the company's computer tools incorrectly.

### TRANSPARENCY

1. The conduct and activities performed by the company/in the context of corporate life must be marked by transparency.
2. Respect for transparency requires that the company undertakes to communicate truthful, complete and understandable information so that the recipients of the same can make informed decisions.
3. From this perspective, all the activities performed by the company/in the context of company life are recorded so that it is possible to verify *at a later time* the decision-making, authorisation and performance processes.
4. The company's accounting system guarantees the recording of every single economic-financial transaction.
5. All accounting operations are supported by documentation certifying the activity performed in such a way as to allow its recording and accounting-mathematical reconstruction.
6. The company guarantees that the inclusion of all items in the financial statements is based on absolute compliance with the current legislation on the subject.
7. The employees called to process the accounting data are required to control/promote the control of all accounting operations related to the production of the same.
8. Furthermore, employees called upon to process accounting data are required to attest only to material facts that are true and/or not to silence/alter in any way information on the economic, financial and equity situation.
9. All transactions of a financial nature, as well as all movements of money, inbound and outbound, are performed, subject to authorisation, by subjects with related powers and are always justified, tracked and recorded.
10. The company undertakes to comply with anti-money laundering and anti-terrorism legislation and to establish working relationships only with reputable parties, engaged in legitimate activities and using funds from legitimate sources.

### CONFIDENTIALITY

1. The conduct and activities performed by the company/in the context of corporate life must be marked by confidentiality.
2. Respect for confidentiality requires that the company undertakes to guarantee the same, also respecting the requirements of Italian Legislative Decree 30-6-2003, no. 196 and subsequent amendments and EU Reg. 2016/679.

### RESPONSIBILITY

1. The behaviours exercised and the activities performed by the company/in the context of company life must be based on responsibility.
2. Respect for responsibility requires that company activities are performed based on principles of sound and prudent management, pursuing company interests in compliance with the laws, regulations and internal procedures, protecting reputation and company assets, as well as always seeking a balance between economic initiative and the protection of environmental safety.

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ENVIRONMENT

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1. In fact, environmental safety is another key component of the company.
2. In this context, the company is committed to disseminating/consolidating the culture of environmental safety also through compliance with the national/international legislation on the subject.

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OCCUPATIONAL HEALTH AND SAFETY

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1. The company recognises the primary importance of occupational health and safety.
2. From this perspective, the company undertakes to assess all the risks associated with the company's activities and to combat them at source.
3. Again, from this perspective, the company undertakes to adopt and implement all the necessary measures with a view to the protection of health and safety at work, as well as to guarantee the necessary information and training in this regard.

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ALCOHOL/DRUGS/PSYCHOTROPIC SUBSTANCES

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1. During working hours and, in any case, immediately before the start of the same, the use of alcoholic/narcotic/psychotropic substances is prohibited.
2. Outside working hours, during the performing of own work on behalf of the company, the use of alcoholic substances is prohibited if this could have an effect on judgement or professional performance or could endanger the safety of the person or of third parties.
3. It is forbidden to keep narcotic/psychotropic substances within the company's property.

## SECTION III – THE RULE OF ACTION

### CORPORATE BODIES

1. The corporate bodies must comply with the requirements contained in this Code of Ethics.
2. Behaviours and activities performed in the context of corporate life must always be based on integrity, honesty, fairness, loyalty, transparency and confidentiality.

### EMPLOYEES/COLLABORATORS

1. Employees/collaborators must comply with the requirements contained in this Code of Ethics.
  2. Behaviours and activities performed in the context of corporate life must always be based on integrity, honesty, fairness, loyalty, transparency and confidentiality.
  3. In the exercise of their work activity, employees/collaborators must always conduct themselves in accordance with discipline, dignity and morality and must avoid any situation that could lead to conflicts.
  4. All activities performed within the scope of company life must be performed with professional diligence.
  6. Employees/collaborators must provide professional contributions and in line with their respective responsibilities.
  7. It is forbidden to perform activities that pose (even potentially) a conflict of interest with those of the company.
  8. It is forbidden to use confidential information for your own benefit or for the benefit of a third party.
  9. Before accepting an administration, management, consultancy or work assignment, autonomous or subordinate, in favour of another subject, each employee must notify their hierarchical superior/the human resources manager.
  10. Employees/collaborators must safeguard the company's assets, guarding movable/immovable property and equipment with the utmost care.
  11. Similarly, they must safeguard the company's IT/electronic assets, preserving technological resources and IT media.
  12. In this context, more specifically, employees/collaborators must strictly comply with the provisions of said document and, more generally, with the company policies in order to avoid compromising the functionality/protection of IT systems.
  13. From another point of view, it is forbidden to disclose your personal password and your access code to company databases to unauthorised third parties, to reproduce company software for personal use, to register software not authorised by the information systems manager on company computers or to use company communication systems (e-mail, Intranet, etc.) to negotiate the purchase/sale of goods/services unrelated to work.
  14. Employees/collaborators must keep paper-based documents in safe places.
  15. Conversely, they must not leave *personal computers* unattended, especially when confidential information is present on their screen.
  16. Employees/collaborators must not offer valuables to persons/entities/organisations that collaborate/are seeking to collaborate with the company.
  17. Employees/collaborators must not request/accept valuables from persons/entities/organisations that collaborate/are seeking to collaborate with the company.
  18. In particular, it is forbidden to ask suppliers/customers of the company to give gifts/presents.
  19. Employees/collaborators are permitted to receive gifts/presents of modest value on the occasion of anniversaries and according to the following guidelines: the gift /present must not be illegal, must not breach the guidelines adopted by the company, must be of reasonable value, must be able to be recorded as normal business expenditure, must not be considered a bribe, must not be able to influence the judgement of the recipient in view of any transactions, must not be offered/received frequently, must comply with business habits/practices, must pursue a business purpose, must be offered as part of an occasion /event in which the exchange of gifts is appropriate and must not cause embarrassment to the company/employee if made public.
- If an employee/collaborator receives a gift/present that does not conform to company habits/practices, before accepting, they must request the approval of their department manager.
20. The offer/acceptance of money, securities or equivalent is always prohibited.

### POLITICAL/TRADE UNION ORGANISATIONS

1. The principles of independence and integrity that guide and govern the conduct and actions of the company must also characterise relations with political/trade union organisations.
2. These relationships, more specifically, must be such as to promote a correct dialectic also and above all with a view to a common and profitable search for solutions.
3. The company does not support initiatives/events of a purely political nature.
4. The company does not exert direct and/or indirect pressure on political leaders.
5. The company does not provide funding and/or contributions, direct and/or indirect, to political leaders and parties/movements/political committees/organisations/trade unions.

### CUSTOMERS

1. The company pursues its success by offering customers quality services.
2. From this perspective, the company's commercial policies are aimed at ensuring the quality of goods and services as well as at promoting complete customer satisfaction.
3. Again, from this perspective, all recipients of this Code of Ethics must observe the internal procedures concerning the management of relations with customers and must provide, with efficiency and courtesy, high quality services.
4. Customers must comply with the requirements contained in this Code of Ethics.

## SUPPLIERS

1. Identical principles must also characterise relationships with suppliers.
2. In particular, the selection criteria of the same in view of the assignment of the orders are subject to objective and transparent evaluations of their professionalism, their business structure, their quality, the price, the methods of performing the service and the methods of delivery.
3. The company undertakes to adopt benchmarking criteria suitable to identify the best contractor in terms of cost-effectiveness and quality of goods and services supplied.
4. The remuneration for suppliers must be commensurate exclusively with the service indicated in the contract and the related payments may not in any way be made to parties other than the contractual counterparty or in third countries other than that of the parties or of execution of the contract.
5. As part of the process of selecting subjects, including professionals, to be entrusted with the execution of services, the level of specific competence, the ability to provide the service of an adequate quality level must be taken into account, as well as within the expected times, the level of economic commitment required by the provider and any guarantees recognised by the same.
6. The persons in charge of the selection, must, in turn, act in the exclusive interest of the company and must refrain from engaging in conduct in which a situation of conflict of interest or illegal conduct can even potentially be perceived.
7. Suppliers must comply with the requirements contained in this Code of Ethics.

## AGENTS

1. Agents who have relationships with the company must comply with all the principles contained in this Code of Ethics.
2. The company only selects agents with adequate professional and reputational qualifications.
3. The remuneration received by the agents must be exclusively commensurate with the service indicated in the contract.
4. The company verifies correct and complete execution of the service by the agent or intermediary before authorising the payment;
5. The relationship with agents must be based on the principles of transparency, collaboration, integrity and fairness.

## THIRD PARTIES

1. Employees/collaborators must inform third parties about the existence and content of this Code of Ethics.
2. Third parties must comply with the requirements contained in this Code of Ethics.

## PUBLIC ADMINISTRATION

1. The company identifies the subjects/corporate functions called upon to maintain relations with the public administration.
2. Said subjects/company functions must operate with independence and integrity.
3. Relations with the public administration must be based on maximum collaboration.
4. It is forbidden to offer/promise sums of money, goods or other benefits to public officials and/or to persons in charge of public service.
5. It is also forbidden to produce false documents and/or documents containing false and/or altered information/data or to omit required information in order to unduly favour the company and/or its customers.
6. Finally, it is forbidden to submit false declarations and/or declarations containing false and/or altered information/data or to omit information required for the purpose of unduly obtaining public funding/contributions.

## COMPETITION

1. The company undertakes to respect the rules of fair competition.
2. The company condemns artifice and cheating, even to the detriment of competition.

## INTELLECTUAL PROPERTY AND ANTI-COUNTERFEITING

1. The wealth of know-how and of intellectual property rights is one of the company's fundamental assets.
2. The company undertakes, as part of its activities, to pay the utmost attention to issues related to the protection of copyright.
3. The company strives to protect its intellectual and industrial property assets and not to breach the rights of customers in this regard.
4. Each employee or collaborator concerned must take action to enable the company to pursue this purpose and must request, where necessary, the help and advice of the company departments responsible for this.
5. The company is active in pursuing any infringement of the assets that are part of its intellectual and industrial property assets.
6. Each recipient of this Code of Ethics is required to comply with the applicable company rules and procedures regarding the intellectual and industrial property of customers.
7. It is forbidden to put into circulation, in any form, intellectual works or industrial products usurping a title of industrial property or with names, trademarks or distinctive signs, national or foreign, capable of damaging its legitimate owner.

## SECTION IV – HUMAN RESOURCES

### POLICIES

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1. The company considers the workplace a community, where the protection and promotion of the well-being of employees are the starting cultural basis where a safe and healthy environment, professional stability and continuity, equal treatment and equal opportunities, training and growth of skills, work life balance and corporate policies are considered essential prerequisites to optimise productivity and to encourage innovation.
2. The company strives for human resources to establish and maintain relationships based on loyalty and mutual trust.
3. The management of human resources is based on considerations of merit profiles and/or correspondence between expected profiles and profiles held by the resources.
4. In the management of hierarchical relationships, authority is exercised fairly and correctly, prohibiting any abuse.

### ENHANCEMENT

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1. The company is committed to taking care of its human resources, promoting their personal and professional development and creating initiatives to increase their skills, knowledge and competences.
2. The company guarantees everyone equal opportunities for training and professional growth, in line with the criteria of merit and the results achieved.
3. The company also undertakes to facilitate constructive relationships, characterised by a constant and continuous exchange of mutual feedback on the activity performed and on the behaviours adopted in order to promote the consolidation of a *feedback* culture.
4. The evaluation of each individual's performance must take into account not only what has been achieved, but also how the results were achieved, rewarding integrity, honesty, passion, proactivity, desire to do and innovative ideas.
5. The company has always paid the utmost attention to the demands of the socio-economic fabric on which its activities take place.

### WELL-BEING

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1. The company is committed to protecting the psycho-physical well-being of human resources, seeking a balance between work and personal and family needs.
2. The company promotes social measures, benefits, services and initiatives that have a real impact on the life of its human resources.

### DIVERSITY

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1. The company believes in the strategic importance of being able to understand the different cultural patterns of the environments in which it operates, analysing their identities, relational and communicative orientations.
2. The company is receptive to new visions and different ways of thinking and understanding professional and personal experience, styles of *leadership*, cultural contexts and also profound differences.
3. From this perspective, the company promotes the creation of environments conducive to dialogue between cultures and cross-cultural collaboration as a fundamental factor of its competitive advantage.
4. The company ensures the same opportunities for growth and professional development for men and women, in the knowledge that gender differences are a way to acquire, within each team, different skills, abilities and styles.



## SECTION V – IMPLEMENTATION

### DISSEMINATION

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**1.** This Code of Ethics is brought to the attention of all its recipients through adequate dissemination activities aimed at ensuring that the ethical principles expressed herein are adopted by all those who operate in the name and on behalf of the company and, more generally, by all those who, according to principles of sound and prudent management, as well as in compliance with the laws, regulations and internal procedures, contribute to the company *mission*.

### COMMUNICATION AND TRAINING

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- 1.** This Code of Ethics is published on the company website.
- 2.** In order to ensure correct understanding of this Code of Ethics, the Management implements, also on the basis of any indications from the body responsible for supervising its implementation, a periodic communication/training plan aimed at promoting knowledge of the ethical principles and standards.
- 3.** Training initiatives are differentiated according to the role and responsibility of the human resources.

### CODE BREACHES

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- 1.** In the event of an established breach of this Code of Ethics, disciplinary measures shall be taken, where deemed necessary, for the protection of corporate interests and compatible with the applicable legislation.
- 2.** The subjects involved may report in writing any breach or suspected breach of this Code of Ethics to the supervisory body, which analyses and manages the report.
- 3.** The confidentiality of the identity of the whistleblower is ensured.

### SUPERVISORY BODY

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**1.** The administrative body has appointed a supervisory body responsible for the following tasks regarding implementation of this Code of Ethics: a) monitoring of application of the same by the subjects involved, accepting of any reports provided by internal and external *stakeholders*; b) periodic reporting to the administrative body on the results of the activity performed, communicating any breaches of this Code of Ethics; c) expressing opinions on the review of policies and procedures, in order to ensure consistency with this Code of Ethics; d) proposing, where necessary, a periodic review of this Code of Ethics.