



## Organisation

**STRONGHOLD ITALY S.R.L.**

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# Code of Ethics and Conduct

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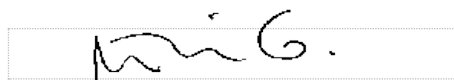
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## SOCIAL ACTORS

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### 2.1 - Customers

The primary objective of the company is to fully satisfy the needs of its customers

In this context, the organisation ensures the best possible execution of the tasks entrusted to it and is constantly striving to offer 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 regulations in force on the subject, undertaking 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 reason, financial institutions are chosen based on their reputation, including their adherence to values comparable to those expressed in this Code of Ethics and Conduct



## 2.3 - Suppliers

### Suppliers of goods and services

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

### Internal and external consultants

Consultants are chosen based on their professionalism and reputation as well as their reliability and adherence to values comparable to those expressed in this document

Relations with consultants are based on transparent agreements and constructive dialogue aimed at achieving common objectives, in accordance with the regulations and principles of this Code of Ethics and Conduct

## 2.4 - Public Administration

The term "Public Administration" refers to any person, entity or interlocutor that can be qualified as a Public Officer or a Person in Charge of a Public Service operating on behalf of central or peripheral Public Administration, or of Public Supervisory Authorities, Independent Authorities, Community Institutions as well as private partners holding a Public Service concession

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 appointed by the company to follow any negotiation, request or institutional relationship with the Public Administration, Italian or foreign, must not in any case attempt to unduly influence their decisions or engage in illegal conduct, such as the offer of money, or other benefits that may alter the impartiality of judgement of the representative of the Public Administration

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 collaborator may have any kind of relationship with the Public Administration for activities related to the company's corporate purpose

When carrying out tenders, those appointed by the company must comply with the law and regulations in force

### **Labour relations with former Public Administration employees**

The recruitment of former Public Administration employees who, in the performance 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 definition of other working and/or consultancy relationships with former Public Administration employees or their relatives and/or relatives-in-law is also carried out in strict compliance with standard procedures

### **Subsidies and funding**

Grants, 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 and Conduct from using funds received from public administrations and/or inter-professional funds for purposes other than those for which they have been granted

Similarly, in the event of participation in public tender procedures, the addressees of this Code of Ethics and Conduct are required to operate in compliance with the law and fair business practice, avoiding in particular to induce the Public Administration to operate unduly in favour of the company

The organisation undertakes to prevent acts that indicate to the addressees of this Code of Ethics and Conduct to carry out actions likely to procure unlawful advantages for them

The use of altered or falsified declarations or documents or the omission of information or, in general, the fulfilment of contrived or fraudulent acts to obtain concessions, authorisations, funding or contributions from the European Union, the State or another public body also constitutes unlawful conduct

