

Organisation

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Code of Ethics and Conduct

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METHODS USED TO IMPLEMENT THE CODE OF ETHICS AND CONDUCT

ETI-05

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5.1 - Organisational principles

The company ensures that the organisational system is based on the criterion of separation between who decides, who executes and who controls. Specifically, all operations are verifiable since they are registered by the organisation

The company binds the person responsible for auditing to the truthfulness and correctness of 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 the execution of controls on operations, authorisation processes and the execution of the operations themselves

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

5.2- Transparency of accounts

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

The addressees of this Code of Ethics and Conduct undertake to refrain from any conduct that may lead to a wrongful act or omission, that directly or indirectly violates the regulatory principles and/or internal procedures relating to the formation of accounting documents and their external representation

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

- **Allow an accurate recording in the accounting books**
- **Allow the immediate identification of the characteristics and underlying motivations**
- **The easy formal and chronological reconstruction**
- **Allow the verification of the process of decision, authorisation and implementation, in terms of legitimacy, consistency and congruity as well as the identification of the various levels of responsibility**

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

The company promotes training and updating in order to make the addressees of this Code of Ethics and Conduct aware of the rules (laws and regulations, internal provisions, provisions of professional unions) governing the formation and management of accounting documents

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5.3 - Checks and verifications

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

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

The organisation prohibits its directors and employees and/or collaborators from making false statements rather than presenting false documents or certifying untrue situations, also through IT systems, with the aim of unduly receiving public funds and / or obtaining and maintaining any benefit

5.3.1.- Supervision for implementation of the Code of Ethics and Conduct

Those responsible for verifying the implementation and application of the Code of Ethics and Conduct are:

- **Sole Managing Director**
- **General Manager**
- **Department Managers**

5.3.2 - Reporting problems or suspicion of violations

It should be noted that in the event of violations of the Code of Ethics and Conduct, the company shall take disciplinary measures against those responsible for such violations, where deemed necessary for the protection of the interests of the organisation, 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

Failure to comply with the rules of the Code of Ethics and Conduct by members of the corporate bodies may result in the competent corporate bodies taking the most appropriate measures provided for and permitted by law

Violations of the rules of the Code of Ethics and Conduct by employees constitute a breach of the obligations arising from the employment relationship, with its contractual and legal consequences, also with reference to their relevance as a disciplinary offence

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

IT data processing through internal systems deserves special attention: any problems and suspected violations must be reported immediately to the IT manager and/or the General Management for appropriate actions

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5.3.3 - Disciplinary measures resulting from violations

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

Violation of the principles and behaviours set out in the Code of Ethics and Conduct compromises the relationship of trust between the company and the infringer, whether they are directors, employees, consultants, collaborators, customers or suppliers

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

- **With regard to employees, through appropriate disciplinary measures, regardless of whether the conduct constitutes a criminal offence, and through the institution of criminal proceedings in cases where the conduct constitutes a criminal offence. In particular, sanctions will be in accordance with the rule and logic of the employment contract applied. Disciplinary measures range from reprimand or warning to suspension without remuneration, demotion and, in the most serious cases, dismissal. Before a disciplinary measure is taken, the person concerned is given the opportunity to explain his or her behaviour**
- **With regard to consultants, collaborators, customers, suppliers and other parties having a contractual relationship with the company, specific methods of termination of the contractual relationship will be started**

Likewise, any compensation for damages suffered by the company as a result of the infringement by the above-mentioned subjects of the provisions contained in the Code of Ethics and Conduct is reserved

5.4 - Public service mission

In the performance of public service activities, the company applies the following behaviour:

- **Respect for the principles of impartiality, a characteristic of public administration**
- **Non-acceptance of benefits, money and utilities**
- **Non-acceptance of illegitimate influences from third parties**
- **Avoid conflicts of interest of their representatives**

5.5- Confidentiality

Addressees are required to observe the utmost confidentiality on information, documents, studies, initiatives, projects, contracts, known to them for the services they provide

The company implement measures to protect the information managed and prevent it from being accessible to unauthorised personnel

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5.6- Diffusion, communication and training

All internal and external parties interested or involved in the mission of the company are made aware of this Code of Ethics and Conduct through specific communication and training activities

5.7- Operational procedures and decision-making protocols

In order to prevent violations of the regulations in force, as well as of the Code of Ethics and Conduct itself, the company provides for 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 subjects (General Management), the company has a delegation system from which certain activities can only be carried out by subjects expressly authorised to do so by means of a specific official delegation and/or power of attorney

It is in fact necessary that the individual operations are carried out in the different phases by different subjects, whose competences are clearly defined and known within the organisation, to avoid unlimited or excessive powers being attributed to individual subjects