



Organisation

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# Code of Ethics and Conduct

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## PRINCIPLES OF CONDUCT TO BE COMPLIED WITH BY PERSONNEL

ETI-03

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### 3.1 - Professionalism

Each person shall perform his or her work and services with diligence, efficiency and fairness, making the best use of the tools and time at his or her disposal and assuming the responsibilities associated with the fulfilment of obligations

### 3.2 - Loyalty

People are required to be loyal to the company

### 3.3 - Honesty

Within the scope of their work, people in the company are obliged to know and diligently comply with the company regulations and the laws in force. Honesty is the essential principle for all the company's activities and initiatives and is an essential value of organisational management. Relations with stakeholders, at all levels, must be based on fairness, cooperation, loyalty and mutual respect. Under no circumstances may a claim of acting in the interest of the company be a ground of justification for a dishonest conduct

### 3.4 - Legality

The organisation undertakes to comply with all national and international standards, laws, directives and regulations and all generally recognised practices. Furthermore, it inspires its decisions and behaviour to take care of the public interest entrusted to it

### 3.5- Fairness and transparency

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People shall not use for personal purposes any information, property or equipment at their disposal in the performance of their assigned function or task. Each person shall not accept or make for himself or herself or for others any pressure, recommendation or report which could be detrimental to the company or of undue advantage to himself or herself, to the company or to third parties. Each person shall reject and 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 shall ensure the utmost confidentiality with regard to news and information constituting the company's assets or inherent to the company's activity, in compliance with the provisions of the law, regulations in force and internet procedures. Besides, people in the company are required not to use any confidential information for purposes other than those related to the development of their activities

### 3.7 - Responsibility towards society

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

### 3.8 - Resolution of conflicts of interest

People shall pursue the general objectives and interests of the company in their working activity. They shall inform their superiors or contact persons without delay of situations or activities in which there may be an interest in conflict with that of the company, on the part of the people itself or of close relatives, and in any other case in which reasons of convenience concur. People shall respect the decisions taken by the company in this respect

### 3.9 - Sense of belonging

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

### 3.10 - Mutual respect

People engaged for any reason in the collaboration with the company are required to and must actively demonstrate respect for the tasks, competences, methods of carrying out the tasks also through the omission of their personal considerations to third parties

### 3.11 - Specific duties

Company's employees must follow the instructions given:

#### Transparency

It is advisable that all information about the activities carried out within the company should be available to everyone

Each employee is to ensure to relate to his manager and colleague in relation to the work performed

In the event of misunderstandings or problems, it is the duty of each person to first report their manager or contact person

Employees must behave in a thoroughly loyal manner and independent of any type of conditioning that may affect the work both towards its Customers and towards external Organisations in relation to him or her

Do not engage in improper business dealings or accept gifts of value or favours of any kind from organisations or suppliers of its own Customer

Report, at the time of acceptance of the professional assignment or during its execution, any relationship or common interest with external organisations that have relations with the client that could lead to conflicts of interest

#### Consistency

A commitment must be carried out once it has been taken. Never leave a job unfinished and never take on commitments you already know you won't be able to cope with

#### Courtesy and kindness

Courtesy and kindness are and must be the basis of every day's activity, and must also be a constant in interpersonal relationships both inside and outside the company

#### Punctuality

If someone is late for an appointment, it is good practice to give notice before the agreed time is due; to do so afterwards is rude

Punctuality is a form of respect for those who are waiting for you

#### Confidentiality

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

#### Professionalism



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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 the customers and the company

People in the company should be professional whatever the activity is

### Working environment

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

### Corporate loyalty and respect

It is everyone's duty to share the company's policies and to ensure that they are respected

During daily work, each employee should always preserve the interests and image of the company and have the utmost respect for company property

When carrying out working activities, economic implications should always be assessed, avoiding waste

### Respect for the customer

The company, like all free market companies, thrives on its customers

Respect, kindness and courtesy should be a constant in the relationships of those who come into contact with the organisation

### Workstations

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

### Personal computer

The personal computers supplied must be kept in the best possible condition and no software other than that provided for in the company configuration may be installed

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The hardware equipment provided by the company constitutes work equipment and may not be used for personal purposes

In particular, the files stored in them constitute company assets and may not be arbitrarily damaged and/or destroyed

It is strictly forbidden to use hardware equipment suitable for copying and/or storing files and data, such as USB mass storage devices, portable computers, optical discs, burners and any other electronic storage media, 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 allowed outside working hours

Internet browsing:

- Is not permitted for sites that do not directly relate to the performance of assigned tasks, especially those that may reveal the employee's political, religious or trade union views
- Is not permitted for any kind of financial transaction, including remote banking, on-line purchases and the like, except in cases directly authorised by the company and in accordance with normal purchasing procedures
- Is not permitted for downloading and installing free software (freeware), shareware, P2P and/or FTP, taken from Internet sites, unless expressly authorised by the company
- Is not allowed for registering in sites whose contents are not related to work
- Is not permitted for non-professional reasons, participation in forums, or the use of chat lines, it is not allowed to store electronic documents of an outrageous and/or discriminatory nature based on sex, language, religion, race, ethnic origin, opinion and labour union membership and/or political affiliation.

### Electronic mail

E-mail is a business tool and is not to be considered private correspondence and therefore:

- Any e-mail message (as it relates to work) can be copied and/or made public at any time
- Using (internal and external) e-mail for reasons not related to the performance of the duties assigned is not allowed
- Sending or storing (internal and external) messages of an outrageous and/or discriminatory nature based on sex, language, religion, race, ethnic origin, opinion and labour union membership and/or political affiliation is not allowed.
- Setting up and use e-mail accounts outside the company is not allowed

### 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 with customers, especially when on their offices

The use of mobile phones for personal purposes should be kept to a minimum and only in emergencies



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### Company cars

The company car is under full responsibility of the person to whom it was assigned as all company assets should be used and maintained with the utmost care

It must be conducted in full compliance with the requirements of the traffic code

The assigned driver of the vehicle must responsibly take care of cleaning, maintenance and ensuring that the car is always in the best possible condition

Any fine resulting from traffic code violations remains the responsibility of the driver

### Private cars

The use of the private car for commercial purposes is foreseen and, as in the case of the company car, the driver must operate in full compliance with the requirements of the traffic code

Any fine resulting from traffic code violations remains the responsibility of the driver