

GENERAL INTRODUCTION

ETI-00

Organization

STRONGHOLD ITALY S.R.L.
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Code of Ethics and Conduct

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0.1 - Introduction

This document, known as the Code of Ethics and Conduct, 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 agreement with the positions expressed and protected by the accreditation system to which it adheres, the organisation is aware that its work contributes, with a sense of responsibility and moral integrity, to the process of development of the Italian economy and the civil growth of the country.

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

The company affirms the adequacy of its Code of Ethics and Conduct in the pursuit of its social mission.

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

Violation of its provisions shall, therefore, constitute an offence of a disciplinary nature and, as such, shall be prosecuted and sanctioned by the company pursuant to and for the purposes of Art. 7 (Disciplinary sanctions) of Italian Law No. 300/1970 (Statute of Workers - Regulations concerning the freedom and dignity of employees, the freedom of trade unions and trade union activity in the workplace and regulations on employment) and may result in compensation for the damage caused to the organisation

As regards collaborators, consultants and self-employed workers (specified below among the addressees) who work for the company and other third parties, the subscription of this Code of Ethics and Conduct or of an extract from it or, in any case, adherence to the provisions and principles set out therein, is a *conditio sine qua non* for the stipulation of contracts of any kind between the company and such individuals. The provisions thus subscribed or, in any event, approved, even by concluding facts, shall form an integral part of the contracts

By reason of what has been described up to this point, any violations by the individuals referred to in the previous paragraph of specific provisions of the Code of Ethics and Conduct, based on their gravity, may legitimise the withdrawal by the company of the existing contractual relationships with said individuals and they can also be identified ex-ante as causes of automatic termination of the contract, pursuant to art. 1456 of Italian Civil Code (termination clause)



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0.2 - Intended readers of this organisational Code of Ethics and Conduct

By adopting the Code of Ethics, the company has intended to define moral values, clear rules and procedures to comply with

The Code of Ethics and Conduct is addressed to:

- **Members of corporate bodies**
- **Employees (both fixed-term and permanent contracts)**
- **Project collaborators**
- **Internal and external 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 business relations or relationships with the company and work to pursue its objectives**

The addressees of this Code of Ethics and Conduct are required to learn its contents and to respect its precepts

The Code of Ethics and Conduct will be made available to them as specified below

The company's management, or a delegate, is responsible for the effective implementation of the Code of Ethics and Conduct and its communication inside and outside the organisation

Company employees, in addition to complying with current legislation and collective bargaining provisions - where applicable -, undertake to adapt their working methods to the aims and provisions of this Code of Ethics and Conduct

This is true both in inter-company relations and in relations with individuals outside the company and, in particular, with public administrations and other public authorities

An essential requirement of any profitable relationship with the company is that the other addressees respect the principles and provisions contained in this Code of Ethics and Conduct

In this sense, at the time of entering into contracts or agreements with other addressees, the company provides the parties involved with a copy of this document