



FINAL PROVISIONS

ETI-06

Organisation

STRONGHOLD ITALY S.R.L.

VIA ALBERICO ALBRICCI 8 - MILAN (MI) - 20122

Web: www.stronghold-group.eu

Code of Ethics and Conduct

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General Management Issue

Date

03/03/2021

Signature

Luca Tavernini

General Management Approval

Date

19/05/2021

Signature

Luca Tavernini

Revision status

Version

Date

Description

Author

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03/03/2021

First issue

Luca Tavernini (SAEF SRL)

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6.1- Conflicts with the Code of Ethics and Conduct

In cases where even one of the provisions of this Code of Ethics and Conduct conflicts with the provisions of internal regulations or procedures, the Code of Ethics and Conduct will prevail over any of these provisions

6.2- Approval process and amendments

This Code of Ethics and Conduct was originally approved by the Director on the following date.

Approval date of the code of Ethics and Conduct

19/05/2021

Any variation and/or integration of this Code of Ethics and Conduct shall be approved by the Director and promptly communicated to all addressees thereof.