

Organisation

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Code of Ethics and Conduct

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4.0 - INTRODUCTION

The rules contained in this section are intended to indicate to the addressees of this Code of Ethics and Conduct the attitudes and behaviour to be observed during the performance of the different company activities in accordance with the values that inspire this document

All the addressees of this Code of Ethics and Conduct (identified in Chapter 0 of this document) must observe correct and transparent behaviour in the performance of their duties, thereby contributing to the effectiveness of the internal control system for the protection of the company value

In compliance with the law, all addressees must maintain an attitude of willingness towards the corporate bodies and supervisory authorities

4.1 - Relationships with personnel

■ Personnel selection

Personnel to be hired, or in collaboration, are selected on the basis of the candidate's profile compared with that expected and with the company's requirements. The selection and hiring process is also based on equal opportunities to all those interested. All data are requested in order to check the different aspects of the professional, aptitude and occupational profile, without asking for any candidate's private details or opinions. In the selection process, the General Management takes appropriate measures to avoid favouritism and benefits of any kind and makes a careful selection.

■ Entering a labour contract

Personnel are hired on a regular labour, professional service or internship contract; no irregular work shall be condoned

■ Integrity and Protection

Within the scope of personnel management, be development and selection as well, all decisions are taken comparing the profiles expected from people to the actual characteristics they possess and/or merits. Expertise and skills are taken into account to be assigned a task or position. In addition, in as far as the overall efficiency of workflow is not affected, forms of flexibility in the organisation of work are favoured to facilitate maternity and childcare

■ Optimisation and training of human resources

The company provides people with information and training tools with the aim of enhancing their specific skills and preserving their professional value. Institutional training given at certain times of professional life in the company is foreseen (for instance, an introduction to the Company and its Business is foreseen for new hires), as well as recurrent training for operating personnel (e.g. training on safety at workplace)

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4.1.1 - Safety and health

The company is committed to providing a working environment that protects the health and safety of its personnel, by communicating and consolidating a safety culture, developing risk awareness and promoting responsible behaviour by the entire personnel

The company also works to preserve the health and safety of its workers, especially through preventive actions

One of the main objectives is to protect human resources by constantly seeking the necessary synergies not only internally but also with suppliers, external consultants and customers involved in the company's activities

All employees must comply with internal rules and procedures on risk prevention and health and safety protection and to promptly report any shortcomings or non-compliance with the applicable rules

The company adopts the general measures for the protection of health and safety at work in compliance with the regulations in force, with particular reference to the provisions of the management system in accordance with UNI ISO 45001. The organisation is committed to strict compliance with all regulations concerning health and safety at work for employees, collaborators and users. More specifically:

- **Defines the operational procedures to be followed and coordinates activities on health and safety at workplace**
- **Ensures the application of the regulations in force also through the creation of risk assessment documents and the definition of working procedures in line with the safety standards in force**
- **Constantly supervises legislative innovations and works towards their implementation**

The company also undertakes to ensure:

- **Assessment of all the risks to health and safety**
- **Prevention planning, aimed at a complex that coherently integrates operational conditions and the influence of environmental factors and work organisation into prevention**
- **The elimination of risks and, where this is not possible, their reduction to a minimum in relation to knowledge acquired as a result of technical progress**
- **Respect for ergonomic principles in the organisation of work, in the design of workplaces, in the choice of equipment and in the definition of working and service supply methods, particularly with a view to reducing the effects on health of monotonous and repetitive work**
- **Risk reduction at source**
- **Replacing what is dangerous with what is not dangerous or is less dangerous**
- **Limiting to a minimum the number of workers who are or may be exposed to risk**
- **Limited use of chemical, physical and biological agents in the workplace**
- **Priority of collective protection measures over individual protection measures**
- **Health monitoring of workers**
- **The withdrawal of the worker from exposure to risk for personal health reasons and transfer to another assignment when possible**
- **Adequate information and training for workers, managers, applicants, the RLS (Italian acronym for Representative of Employees on Safety Matters) and all personnel**
- **Adequate instructions to workers**
- **Participation and consultation of workers and the RLS**
- **Planning of measures considered appropriate to ensure the improvement of safety levels over time, including**

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through the adoption of codes of conduct and good practices

- Emergency measures to be implemented in the event of first aid, firefighting, evacuation of workers and serious and immediate danger
- The use of warning and safety signs
- Regular maintenance of rooms, equipment, installations with particular regard to any safety devices in accordance with the instructions of the respective manufacturers
- Adequate instructions and training to employees, collaborators and users in accordance with the provisions of the law in force and the applicable NCLA

4.1.2 - Privacy protection

Data processing of the company's personnel complies with the provisions contained in the Regulation (EU) No. 2016/679 on personal data protection (GDPR). A privacy statement is given to people, which identifies:

- Data processing purpose and methods
- Any recipient to whom personal data may be disclosed
- Information necessary to exercise the right of access

Wherever legislation requires it, individuals are asked for specific consent to the processing of their personal data. Employees and/or collaborators cannot be asked any questions on their personal likes/dislikes and their private life in general

The same procedure is also applied for the electronic management of information and personal data

4.1.3 - Environmental protection

The organisation is committed to pursuing environmental protection through compliance with Italian and EU legislation and regulations

Undertakes to implement pollution prevention and to raise employees' and collaborators' awareness of environmental issues

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4.2 - Duties of personnel

For further details, please also refer to the management system procedures

People must behave loyally in order to comply with the obligations entered into in the employment contract and with the provisions of the Code of Ethics and Conduct, ensuring the required services

4.2.1 - Delegations and responsibilities

Duties, responsibilities and powers of directors, employees and collaborators are defined by means of specific resolutions and/or procedures

These duties, responsibilities and powers must be known, accepted and respected

4.2.2 - Obligations of department managers towards the Code of Ethics and Conduct

Each department manager, identified in the organisation chart, job description and/or delegation system, is obliged to:

- **Ensure compliance with the Code of Ethics and Conduct by those directly or indirectly under his responsibility**
- **Be a behaviour model for his or her employees/collaborators**
- **Ensure that employees understand that the provisions contained in this Code of Ethics and Conduct are an integral part of their work performance**
- **Report promptly to the General Management any reports or special needs of the subordinates**

Failure by department managers to comply with the obligations referred to in this chapter may result in the application of disciplinary sanctions, as provided for in the sanctions system

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4.2.3 - Obligations of all employees towards the Code of Ethics and Conduct and documentation submitted by the company

Each employee is required to be aware of the provisions contained in the Code of Ethics and Conduct or referred to therein, as well as with the relevant legal provisions governing the activities carried out in the context of his or her function, which are an integral part of each employee's work performance

Employees who become aware of an alleged misconduct must communicate the information in their possession regarding such conduct only to their superiors and/or to the General Management in the manner provided by the internal system

The General Management adopts supervision systems on the actual reading and comprehension of the documents required by law by employees, collaborators, etc., by means of anonymous tests, taking the most appropriate actions to constantly increase the level of disclosure and comprehension of their contents

Employees are also obliged to:

- **Refrain from behaviour contrary to these provisions and rules**
- **Address to their superiors and/or delegates responsible for managing the prevention model in case of needing clarification on the methods of application of the Code of Ethics and Conduct or the reference regulations**
- **Promptly report to at least one of the above-mentioned persons any news about possible violations of the Code of Ethics and Conduct**
- **Cooperate with the organisation in case of investigations aimed at verifying and, if necessary, sanctioning possible infringements**

These behavioural requirements are also required for external consultants and any kind of collaborators

4.2.4 - Company assets protection

Each addressee must work with diligence to protect the company's assets from improper or incorrect use.

All employees must know and put into effect the company's privacy policies so as to guarantee data are kept confidential, available and unaltered

Information and know-how must be protected with the utmost confidentiality. The most significant data that the company acquires or creates in the course of its business activities must be considered confidential information and given appropriate attention; this also includes information acquired from and concerning third parties (customers, contacts, partners, employees, etc.)

Those who, in the performance of their duties, come into possession of confidential information, materials or documents must inform their superiors

Both during and after termination of employment relationship with the company, individuals may use confidential data only in the interest of the company and never for their own benefit and/or that of third parties

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4.2.5 - Confidential information on third parties

Company personnel must refrain from using unlawful means to acquire confidential information about other organisations and third parties

Those who, in the context of a contractual relationship, become aware of confidential information on another person are required to use such information only in the manner provided for in the contract in question

People may not request, receive or use confidential information concerning third parties without proper authorisation. If confidential information about another person that is not already subject to a non-disclosure agreement or other form of protection is obtained, the manager should be contacted for assistance in handling such information

4.2.6 - Use of company assets

Everyone must work with diligence to protect the company's property, acting responsibly and in line with the instructions and procedures set that govern the use of such property, documenting such use with accuracy.

Specifically, the personnel must:

- **Use the assets that have been entrusted to him or her with great care, going easy on them**
- **Adequately handle the company's property so as not to damage its integrity or performance or in a manner conflicting with the company's interests**
- **Adequately shield the resources entrusted to him/her and promptly inform the units in charge of any threat or event that may be detrimental to the company**

As regards IT systems, employees are requested to:

- **Strictly follow and implement the company's safety policies so as not to compromise the proper operation and protection of IT systems**
- **Not send menacing or offensive e-mail messages, use inappropriate language, express inappropriate comments that may be offensive for somebody and/or jeopardise the corporate image**
- **Refrain from surfing on websites with indecorous and offensive content and in any case not related to professional activities**



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4.3- Relationships with customers

For further details, please also refer to the operative procedures of the management system

4.3.1 - Impartiality

The company undertakes to offer its products and services without any discrimination between private or potentially endowed customers, with particular attention to the latter

4.3.2 Agreements and communication with customers

Contracts and communications to customers by the company must always be:

- Clear and simple; vocabulary and terms used should be as close as possible to that normally used by the interlocutors
- In compliance with regulations in force, without resorting to any evasive or improper practices
- Complete without omitting any relevant element for the customer to make a decision

4.3.3 - Styles of personnel behaviour towards customers

People in the company's conduct when in contact with clients is characterised by goodwill, respect and politeness for a highly professional and mutually beneficial and cooperative relation

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4.3.4 - Data processing

As regards customers' data processing, the company complies with the provisions contained in the GDPR regulations on personal data protection

A privacy statement is achieved, which identifies

- **Data processing purpose and methods**
- **Any recipient to whom personal data may be disclosed**
- **Information necessary to exercise the right of access**

Wherever legislation requires it, individuals are asked for specific consent to the processing of their personal data; customers cannot be asked any questions on their personal likes/dislikes and their private life in general

Personnel are required to process data with the utmost discretion and confidentiality, with regard to the inside; the same procedure is also applied for the electronic management of information and personal data

4.4- Relationships with suppliers

For further details, please also refer to the management system procedures

4.4.1 - Selection of supplier

Purchasing processes are focused on:

- **Attaining the maximum competitive benefits for the company**
- **Providing equal opportunities for suppliers**
- **Loyalty**
- **Impartiality**

The selection of suppliers and the determination of purchasing conditions are based on an objective assessment of the quality, price of the good or service, its actual availability and the guarantee of service and timeliness

A further selection criterion is the exclusion of suppliers with ongoing criminal proceedings for procurement or other *Mafia*-related matters



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4.4.2 - Integrity and independence in the relations

Relations with suppliers, including financial and consultancy contracts, are constantly supervised by the company

The act of entering into a contract with a supplier must always be based on extremely clear relationships, avoiding where possible any form of dependency

Documents exchanged with suppliers must be properly archived, specially accounting documents which must be kept for the periods laid down by the regulations in force

4.5 - Relations with the Public Administration

This section deals with relations between the company and public administrations

4.5.1 - Fairness and loyalty

The company intends to conduct relations with the Public Administration with the utmost transparency and ethical behaviour. These relations, which must comply with the regulations in force, are informed by the general principles of fairness and loyalty so as not to compromise the integrity of either party

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4.5.2 - Gifts, favours and benefits

No person in the company may give money or offer economic advantages or other types of benefits to persons in the public administration for the purpose of obtaining assignments or other advantages for themselves or for the company

Employees must not offer or accept gifts that could be regarded as exceeding regular commercial practices or manners, or that are intended to obtain a preferential treatment at any activity that can be linked to the company

In this sense, a "regular commercial practice or manner" with a value of less than € 100.00 is considered as a gift (note: to be checked if this should be provided for)

Especially, it is forbidden to make any form of gift to Italian or foreign public officials or their family members that might influence their independent judgement in order to obtain more favourable treatment or undue benefits or advantages of any kind

The term "gift" refers to any kind of benefit: not only material goods but also, for example, free attendance at conferences, training courses, the promise of a job offer, etc.

The above cannot be avoided by resorting to third parties: in this respect, not only unlawful payments made directly to entities or their employees are considered acts of corruption, but also unlawful payments made to persons acting on behalf of such entities

On anniversaries and/or public holidays, donations of goods are permitted, provided they are modest in size and in any case within the limits decided by the Board of Directors or the General Management and adequately documented in order to allow the appropriate checks to be carried out

On the other hand, if a person in the company receives explicit or implicit requests for benefits from a member of the Public Administration, he or she shall immediately inform the Board of Directors or the person to whom he or she is required to report for the adoption of appropriate checks and initiatives

4.6 - External relations

This section deals with details of the company's external relations

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4.6.1 - External effectiveness of the Code of Ethics and Conduct

Anyone operating in the name and on behalf of the company who comes into contact with third parties with whom the organisation intends to enter into commercial relations, or with whom it is obliged to have relations of an institutional, social, political or any other nature, is obliged to:

- **Inform them of the commitments and obligations imposed by the Code of Ethics and Conduct**
- **Demand compliance with the obligations of the Code of Ethics and Conduct in the performance of their activities**
- **Take the necessary initiatives in case of refusal by third parties to comply with the Code of Ethics and Conduct or in case of failure or partial execution of the commitment to comply with the provisions contained in the Code of Ethics and Conduct itself, informing the General Management or delegates.**

4.6.2 - Conflict of interest

All addressees must ensure that any decision taken in the context of their activities is made in the interests of the company

All addressees are required to avoid any activity or situation of personal interest that constitutes or could constitute, even if only potentially, a conflict between their own interests and those of the organisation and, in any case, they must comply with the specific procedures adopted by the company

All addressees of the Code of Ethics and Conduct shall refrain from taking advantage of their relationship with the company in order to favour themselves or third parties to the detriment or disadvantage of the organisation itself

It is forbidden for any employee to take part, directly or indirectly, for any reason whatsoever, in commercial initiatives that are in direct competition with the company, unless such participation has been previously communicated to and approved by the competent Board of Directors.

4.6.3 - Competitive practices

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It is of primary importance to the company that the market is based on fair and loyal competition

The company is committed to meticulously observing the relevant laws and cooperating with the market regulatory authorities. More specifically:

- It undertakes to carry out the activities in compliance with the rationale of the law for the supply of goods and services which are entrusted through express agreements with public entities, including economic entities and joint-stock companies with public participation
- It competes fairly on the market and respects the rules of competition
- It undertakes to provide correct information about its activities both internally and externally or in response to legitimate requests
- Ensures the truthfulness and correctness of corporate data in financial statements, reports and other official documents

4.6.4 - Gifts and benefits

See chapter 4.5.2 above