



Organization

STRONGHOLD ITALY S.R.L.

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Code of Ethics and Conduct

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General Management Issue

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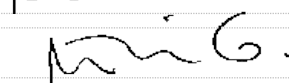


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PRINCIPLES OF CONDUCT FOR THE ORGANISATION

ETI-01

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1.0 - Introduction

The following principles are considered to be essential, and our organisation is committed to respecting them towards everyone

It is also essential that these values are not mere statements but are translated into conducts and behaviours inherent to the company

As an organisation and as individuals, all addressees in the work environment are expected to apply them correctly in both internal and external operations and relationships

The fundamental values on which the company's activities are based are:

- 1.1 Integrity in compliance with laws and regulations
- 1.2 Repudiation of discrimination
- 1.3 Centrality, development and valorisation of human resources and equity of authority
- 1.4 Territorial rooting
- 1.5 Transparency and business ethics
- 1.6 Quality
- 1.7 Diversity
- 1.8 Legality and fight against terrorism and crime

The company expects these values to define its identity, and unite employees and collaborators to the global organisation



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1.1- Integrity of conduct and compliance with laws and regulations

The company is committed to creating and providing quality services and to competing on the market according to the principles of fair and free competition and transparency, maintaining fair relations with all public, governmental and administrative institutions, with the citizenship and with third party companies

Each person is expected to act, in all situations, with integrity, transparency, consistency and equity, conducting all business dealings honestly

The company operates in strict compliance with the law and ensures that all its personnel do so: people must behave in accordance with the law, whatever the context, whatever the activities carried out and wherever they work

This commitment must also apply to consultants, suppliers, customers and anyone who has a relationship with our organisation

The company will not initiate or continue any relationship with anyone who does not intend to align with this principle

1.2- Repudiation of discrimination

Upon taking any decision on relationship with parties involved (managing staff or organising tasks, selecting and managing suppliers, communicating with the community where the company works and bodies that represent that community), our organisation undertake not to discriminate on the basis of age, gender, sexual orientation, disability, race, nationality, political opinions and religious beliefs

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1.3- Centrality, development and valorisation of human resources and equity of authority

The company recognises the centrality of human resources and believes that an essential factor for success and development is the professional contribution of the people who work for the company

The company has always placed professionalism and individual contribution of its people at the centre of its work, continuing a style of relations that aims to recognise the work of each person as an essential element of corporate and personal development

At the same time, the company places dialogue, exchange of information - at all levels -, development and professional updating of its employees and creation of a corporate identity and sense of belonging at the heart of its daily work

This value results in:

- **The creation of a working environment capable of enhancing the contribution and potential of the individual through the gradual empowerment of the personnel**
- **The implementation of a relationships system aimed at favouring teamwork over hierarchical relationships**
- **The daily effort to share skills and knowledge also through the use of innovative systems**

The company attaches the utmost importance to those who work within its organisation, contributing to its development, as it is through human resources that the company is able to provide, develop, improve and guarantee optimal management of its services

Without prejudice to legal and contractual provisions on workers' duties, professionalism, dedication to work, loyalty, spirit of cooperation, mutual respect, sense of belonging and morality are required of employees

In the management of contractual relationships involving the establishment of hierarchical relations, our company is committed to ensuring that authority is exercised fairly and correctly and that all forms of abuse are avoided: in particular, the company ensures that authority does not turn into the exercise of power detrimental to the dignity and autonomy of the person

These values must in any case be protected when making choices about the work organisation

1.4 - Territorial rooting

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The company's aim is to carry out projects aimed at directly involving citizens, public and private institutions, businesses and associations in everything related to health education, prevention and taking charge of one's own well-being. The company is continuously taking action in order to ensure that its collaborators comply with the same rules of conduct and direct their activities towards the same principles and values

The company also promotes local development through a strong connection with the different players in the local community. Therefore, its operation is carried out in the local community for the development of a rich and generative society, capable of recognising and enhancing its resources, skills and potential, gender, cultural and ethnic differences, promoting well-being, integration and social development and enhancing their recognition by the users and by those who materially offer the service

1.5 - Transparency and business ethics

The organisation's history, identity and values are reflected in a business ethic based on:

- **Reliability**
intended as a guarantee of absolute seriousness in the projects launched, in the transactions and commitments
- **Solidity**
relating to an entity that has a well-established capital base, as evidenced by its prolonged activity
- **Transparency**
as a result of the concept of the social role, which requires not only respect for ethical principles and work, but also the implementation of procedures enabling the communities of reference and social actors to have access to information in order to be able to reconstruct their actions
- **Contractual fairness**
by avoiding that, in existing relationships, any worker, in the name and on behalf of the company, tries to take advantage of any contractual omission or unexpected event in order to renegotiate a contract benefiting from the position of dependence or weakness the other party is in
- **Protection of competition**
refraining from collusive, predatory or abusive behaviour

1.6 - Quality

Quality is a hallmark of our company. The organisation is committed to and responsible for quality assurance in all its

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activities, consistent with its long-term strategy

The activities are implemented by the company through a set of processes managed through a quality management system that offers outside the company uniformity, transparency and service improvement.

1.7 - Diversity

The company requires its directors, employees and collaborators to behave in such a way as to ensure absolute respect for the dignity of persons:

- Ensures the strictest compliance with regulations on the protection of child labour and workers' freedoms and rights
- Ensures conditions for free membership of trade unions
- Does not tolerate human rights violations
- Promotes integration as a form of collective enrichment within the complex social fabric

In particular, the company condemns any form of discrimination on the basis of gender, ethnicity, politics and religion

1.8 - Legality and fight against terrorism and crime

The company firmly believes in democratic values and condemns any activity that may be aimed at terrorism or subversion of the democratic order

The organisation also condemns any activity involving:

- Forgery, falsification, alteration and/or spending of money, public credit cards and stamps
- Acceptance and treatment of incomes from criminal activities (money laundering)
- Unauthorised access to external computer systems
- Unauthorised possession of access codes
- Damage to equipment and data
- Fraud in the management of electronic signature certification
- Interception, obstruction and interruption of computer communications
- Dissemination of ideas of tolerance and silence concerning the use of drugs or substances of any addictive nature
- Incitement to commit unlawful acts or acts contrary to moral sense
- Negligence in combating violence, damage to public property and compliance with internal regulations