

IEMME CODE OF CONDUCT

Value of reputation and fiduciary duties.

Good reputation is an essential intangible asset for society.
Externally, it promotes social approval, the attraction of the best human resources, the satisfaction of the Region and the other bodies for which it operates, the serenity of suppliers and reliability towards third parties in general.
Internally, it makes it possible to make and implement decisions without friction and to organise work.

The value of reciprocity.

This code is based on an ideal of cooperation aimed at protecting the mutual respect and benefit of the parties involved and preventing the commission of crimes.
It is therefore required its stakeholders to act according to principles and rules inspired by a similar ideal of ethical conduct and in full compliance with the laws and regulations in force.

General principles.

The company's activities, aimed at creating and managing tools and conditions that lead to the improvement of the relationship between public institutions and civil society, are inspired by the following principles:

Impartiality.

In decisions that affect relations with its stakeholders (customer/user management, work organization, selection and management of suppliers), any form of discrimination based on age, sex, state of health, race, nationality, political opinions and religious beliefs of its interlocutors is avoided.

Transparency and completeness of information.

The company's collaborators are required to provide complete, transparent, comprehensible and accurate information, which will allow all stakeholders to make autonomous and informed decisions in the development of relations with the company.

In particular, in the formulation of any form of agreement, care will be taken to specify to the contractor, in a clear and understandable way, the conduct to be followed in the performance of the relationship established.

Honesty.

In carrying out activities and relationships of any type and nature, collaborators are required to diligently comply with the laws in force, the code of ethics and internal regulations. Under no circumstances can the pursuit of the interest of the institution justify a conduct that does not comply with an honest line of conduct.

Fairness in case of conflict of interest.

In the conduct of any business, situations in which the parties involved in the transactions are, or may even appear, to have a conflict of interest must be avoided.

Confidentiality.

The company ensures the confidentiality of the information in its possession and refrains from seeking confidential data, except in the case of express and conscious authorization and compliance with the legal regulations in force. The company's employees are required not to use confidential information for purposes unrelated to the exercise of their business.

Value of human resources.

The company's employees are an indispensable factor in its success. For this reason, the company protects and promotes the value of human resources in order to maximize their degree of satisfaction and increase the wealth of skills possessed. Therefore, in the management of relationships that imply the establishment of hierarchical relationships, the company requires that authority be exercised with fairness and fairness, prohibiting any conduct that may be considered detrimental to the dignity and autonomy of the collaborator.

Quality of services.

The company orients its activity to the satisfaction and protection of its customer/user as well as to the appreciation of the community in which it operates. For this reason, the company develops its activities according to high quality standards.

Fair competition.

The company intends to protect the value of fair competition by refraining from collusive and predatory behaviour.

Responsibility towards the community.

The company is aware of the influence that its activities can have on the conditions, economic and social development and general well-being of the community, as well as the importance of social acceptance of the communities in which it operates.

General Standards of Conduct

Processing of Information.

Stakeholder information is processed in full respect of the confidentiality and privacy of the data subjects.

Giveaways and gifts.

Any form of gift, gift, promise of future benefits exceeding normal commercial practices or courtesy, and in any case aimed at acquiring favorable treatment in the conduct of business, is not permitted.

Such conduct is particularly recommended in the conduct of relations with Italian and foreign public officials, relatives and relatives.

The only forms of courtesy allowed must fall within the concept of modest value, and be aimed at promoting the image or initiatives promoted by it: the same must in any case be authorized by the management and supported by appropriate documentation.

The same rules apply to gifts and gifts received from employees or directors.

External communication.

Communication with its stakeholders is based on respect for the right to information; Under no circumstances is it permitted to disseminate false or biased news or comments.

Every communication activity complies with the laws, rules, practices of professional conduct, and is carried out with clarity, transparency and timeliness.

Personnel management.

Personnel management is carried out in the following ways:

Personnel selection.

The evaluation of applications is carried out on the basis of the correspondence of the candidates' profiles to the company's needs, in compliance with equal opportunities for all interested parties.

The information requested from candidates is closely linked to the verification of the individual's professional and psycho-aptitude profile, in full respect of the private sphere and opinions of the same.

During the selection and recruitment phases, the Human Resources department, within the limits of available information, adopts appropriate measures to avoid any form of favouritism, nepotism, or cronyism.

Establishment of the employment relationship.

The staff is hired with a regular work contract; Any form of irregular work or "undeclared work" is not tolerated.

Upon establishment of the employment relationship, each employee receives accurate information relating to:

- characteristics of the function and tasks to be performed;
- regulatory and remuneration elements, as regulated by the national collective bargaining agreement;
- rules and procedures to be adopted in order to avoid conduct contrary to legge's rules.

This information is presented to the employee in such a way that acceptance of the assignment is based on an actual understanding.

Employee management.

Each manager is required to make the most of the employees' working time by requesting services consistent with the exercise of their duties and with the work organization plans.

It constitutes an abuse of the position of authority to request, as an act due to the hierarchical superior, services, personal favors or any behavior that constitutes a violation of this code of ethics.

The involvement of collaborators in the performance of the work is ensured, also by providing moments of participation in discussions and decisions functional to the achievement of the company's objectives.

Each manager makes full use of and enhances all the professionalism present in the structure through the activation of the levers available to promote the development and growth of their employees.

In this context, it is particularly important for managers to communicate the strengths and weaknesses of the employee, so that the latter can aim to improve his or her skills also through targeted training.

The company provides all employees with information and training tools with the aim of enhancing the specific skills and implementing the professional value of the staff.

Institutional training is provided at certain times in the employee's corporate life and recurrent training is provided for operational staff.

Staff evaluation.

The company avoids any form of discrimination against its employees.

As part of the personnel management and organization processes, decisions are based on the correspondence between expected profiles and profiles possessed by employees.

The evaluation of collaborators is determined with the involvement of the personnel department, the reference managers and, as far as possible, all the subjects who have entered into a relationship with the assessed.

Also during the evaluation, the personal function, within the limits of the information available, adopts appropriate measures to avoid favoritism, nepotism, or forms of clientelism.

Workers' rights.

Workers' rights are protected as follows:

Safety and health on the lavoro.

The company is committed to spreading and consolidating a culture of safety and health by developing Mindfulness risks, promoting responsible behaviour on the part of all employees. To this end, the company carries out technical and organizational interventions, through the introduction of:

- an integrated system for managing risks, security and the resources to be protected;

- control and updating of lavoro's methodologies;
- training and communication interventions.

Privacy Policy.

The privacy of the collaborator is protected by adopting standards that specify the type of information to be requested from the collaborator and the related methods of processing and storage. Any investigation into the ideas, preferences, personal tastes and, in general, private lives of collaborators is excluded.

These standards also prohibit, except in the cases provided for by the IEGE, the communication or dissemination of personal data without the prior consent of the data subject.

Protection of the person.

The company is committed to protecting the moral integrity of its employees by guaranteeing the right to working conditions that respect the dignity of the person.

For this reason, it safeguards workers from acts of psychological violence, and counteracts any attitude or behavior

discriminatory or detrimental to the person, their beliefs and preferences.

Employees who believe they have been harassed or discriminated against for reasons related to age, sex, race, state of health, nationality, political opinions and religious beliefs, etc., may report the incident to the personnel management who will assess the actual violation of the code of ethics.

Enhancement and training of human resources.

The employee must participate in these moments in a spirit of collaboration and independence of judgment.

Duties of the worker.

The following are the duties that the company's worker must comply with:

Criteria of conduct.

The collaborator must act loyally, in compliance with the obligations signed in the lavoro contract and the provisions of the code of ethics, ensuring high standards of the services rendered.

He/she must absolutely avoid behaviour that could damage company assets, company management, the relationship with stakeholders and the corporate image.

Use of company assets.

Each employee is required to work diligently to protect company assets, through responsible conduct and in line with the objectives and operating procedures set up to regulate their use, accurately documenting their use.

The company reserves the right to prevent distorted use of its assets and infrastructure through the use of appropriate control systems.

Conflict of interest.

All employees of the company are required to avoid situations that may give rise to conflicts of interest (e.g. co-interests with suppliers or customers) and to refrain from personally benefiting from business opportunities of which they have become aware in the course of their duties. In the event that even the appearance of a conflict of interest occurs, the collaborator is required to notify his or her manager, who, in accordance with the established procedures, informs the Management, which assesses the actual presence on a case-by-case basis.

Information management.

The employee must know and implement the provisions of the company's policies on information security to ensure its integrity, confidentiality and availability. He/she is required to prepare his/her documents using clear, objective and exhaustive language, allowing any checks by colleagues, managers or external parties authorized to request them.

Criteria of conduct in customer relations.

Impartiality.

The services and benefits can be rendered by the company to the Region, to the local territorial authorities.

The company undertakes not to discriminate against its customers/users in the performance of its business.

Contracts and communications to customers/users.

Contracts and communications to customers must be:

- clear and simple, formulated in a language as close as possible to that normally used by the interlocutors;
- comply with current regulations, without resorting to evasive or otherwise unfair practices;
- complete, so as not to overlook any element relevant to the customer's decision.

The purposes and recipients of the communications determine, from time to time, the choice of the most suitable contact channels for the transmission of content, committing not to use misleading or untruthful advertising tools.

Employee behavior with customers.

The company's style of conduct is based on availability, respect for laws and regulations and courtesy, with a view to a collaborative and highly professional relationship. Collaborators of the company, whether they are employees, suppliers, partners or consultants, in the context of the production and management of services rendered to the Public Administration, must also adopt conduct aimed at avoiding the occurrence of crimes contemplated by Legislative Decree 231/2001.

Quality control and customer satisfaction.

The company undertakes to ensure adequate quality standards of the services offered, also monitoring the level of quality perceived by the user.

Criteria of conduct with suppliers.

Choice of supplier.

The purchasing processes are based on the search for high and efficient standards of service, the granting of equal opportunities for each supplier, loyalty and impartiality. Therefore, the collaborators involved in these processes are required not to preclude anyone - in possession of the required requirements - from competing for the stipulation of contracts, and to adopt - in the choice of the shortlist of candidates - objective and documentable criteria.

For some categories of supplies, depending on their type and extent, the company has a register of accredited names whose qualification criteria do not constitute an access barrier. For the company, the reference requirements are the appropriately documented availability of means, organizational structures, design skills and resources, know-how, etc.

Integrity and independence in relationships.

The stipulation of any contract, agreement or partnership must always be based on criteria of extreme clarity, avoiding generating forms of mutual dependence.

Therefore:

- any contract of significant value must be constantly monitored; Short- or medium-term contracts are preferred, provided that they contain price revision clauses;

To ensure maximum transparency and efficiency of the purchasing process, the company provides:

- the separation of roles between the unit requesting the supply and the unit stipulating the contract;
- adequate traceability of the choices made;
- the retention of information as well as all documents relevant to the management of the relationship.

Ethical behaviour in procurement.

Violations of the general principles of the Code of Ethics entail sanctioning mechanisms, also aimed at avoiding crimes against the public administration.

To this end, specific clauses are provided for in the body of the individual contracts.

Criteria of conduct with communities and institutions.

Social policy.

The company pursues objectives consistent with those of development of the community and the environmental context in which it operates.

This condition is based on the awareness that the satisfaction of the community represents one of the goals of society as well as a competitive advantage.

Institutional relations.

Any relationship with local, national and international public institutions that can be traced back to normal administrative activity is oriented towards criteria of transparency and fairness, avoiding collusive attitudes.

Any relationship with the institutions local, national and international public relations attributable to normal administrative activity are oriented towards criteria of transparency and fairness, avoiding collusive attitudes.

In order to ensure maximum clarity in relations, contacts with institutional interlocutors take place exclusively through contacts who have received an explicit mandate from the company's top management.

Relations with the Public Administration.

The company, in its relations with the Public Administration, issues statements, provides documentation, certifications and truthful information.

The company prohibits payments, even indirect, to public officials and third parties in general, aimed at influencing an official act, determining illegitimate favours, promises or solicitations of advantages or benefits in general.

The company prohibits active or passive bribery or collusive behaviour of any nature and in any form.

When any business negotiation, request or relationship with the Public Administration is in progress, the personnel of the company in charge must not try to improperly influence the decisions of the other party, including those of officials who deal with or make decisions on behalf of the Public Administration.

In the specific case of tenders or negotiations with Public Bodies, the company's representatives are required to operate in compliance with current legislation and correct commercial practice.

Implementation and monitoring of the Code of Ethics.

Communication and training.

The Code of Ethics is brought to the attention of internal and external stakeholders through specific communication activities.

In order to ensure that all employees have a correct understanding of the Code of Ethics, the Personnel Management prepares and implements an annual training plan aimed at promoting knowledge of the principles and ethical standards.

Training initiatives are differentiated according to the role and responsibility of employees; In addition, a special initial training program is provided for new hires.

The company's internal control manager is assigned the following tasks:

- verify the application and compliance with the code of ethics through a monitoring activity consisting in ascertaining and promoting the continuous improvement of ethics in the company to which it belongs;
- monitor initiatives for the dissemination of knowledge and understanding of the Code of Ethics, ensuring the development of ethical communication and training activities, analysing and integrating proposals for the revision of company policies and procedures with significant impacts on business ethics;
- receive and analyse reports of violations of the Code of Ethics;
- report violations of the Code of Ethics to the Board of Directors, also proposing any changes and additions to be made to the same.

Stakeholder reports.

All stakeholders may report, by email or online form on the company website, even anonymously, any violation or suspected violation of the code of ethics to the SB 231 or another figure in charge of whistleblowing, who provides an analysis of the report, possibly listening to the author and the person responsible for the alleged violation.

It is the duty of those who are authorized to receive reports. act in such a way as to protect whistleblowers against any type of retaliation, understood as an act that may give rise to even the mere suspicion of being a form of discrimination or penalization (for example, for suppliers: interruption of business relationships...; for employees: failure to promote, etc.).

The confidentiality of the identity of the whistleblower is also ensured, without prejudice to legge's obligations.

Violations and Revisions.

Those who are authorized to receive reports report the violations of the code of ethics, which have emerged as a result of the reports of stakeholders or of the activity carried out independently, together with the suggestions deemed necessary, to the Administrator in relation to the extent of the violation.

These entities are responsible for:

- make decisions regarding violations of the Code of Ethics;
- express opinions on the revision of the most relevant policies and procedures, in order to ensure their consistency with the Code of Ethics;
- provide for the periodic revision of the Code of Ethics.

Dissemination to staff.

This Code will apply to all employees of the Company who will be hired after its entry into force, while for those previously hired it will be approved by them by means of specific written acceptance.