

OBJECTIVES AND PURPOSES

This Code of Conduct (CoC) is addressed to Fondall srl and to all those who, for every reason, relate to it in order to make clear, unequivocal and understandable the ethical principles that inspire it.

The CoC is the document in which the ethical principles of Fondall are set out, which must inspire all the subjects with whom Fondall operates. The value and importance of the CoC are emphasized by the responsibility of the Entities referred to Legislative Decree no. 231 of 8 June 2001.

The reasons that led to the adoption of the CoC are:

- establish a behavioural standard of operational correctness in the interest of Fondall;
- identify measures and internal control tools suitable for monitoring compliance with the CoC;
- create added value.

The requirements set out in this CoC are not only of legal and economic nature but underlie the precise social and moral commitment that Fondall assumes.

RECIPIENTS OF CoC AND GENERAL PROVISIONS

The CoC applies to all subjects - for aspects of competence and responsibility – that for any reason provide their contribution in carrying out Fondall activities. All recipients have the right and obligation to know it, apply it, request clarifications, promote improvements and report any gaps.

In particular, everyone, according to their responsibilities and skills, must be informed:

- on the objectives and commitments of social and environmental responsibility;
- on the evaluation of projects and investments related to the development of Fondall;
- on the management of all operational activities.

The obligatory recipients of the CoC are anyone who carries out activities in the name and on behalf of Fondall and under its control.

All subjects, in relation to their specific skills, must:

- inform third parties about the contents of the CoC and in particular the obligations deriving from it for those acting in the name and / or on behalf of Fondall;
- ensure that third parties comply with the requirements of the CoC relating to their relationship with Fondall;
- report to their superiors the violation by third parties of the obligation, as expressed above, to comply with the provisions of the CoC.

It is everyone's right/ duty to contact their superiors in case of need for clarification on how to apply the CoC, as well as to report any news concerning possible violations of the same.

Failure to comply with the rules of conduct indicated in this CoC constitutes a breach of the obligations deriving from the employment relationship and gives rise to the application of disciplinary sanctions.

Fondall, on the other hand, undertakes to:

- promote the dissemination of the CoC;
- ensure a training and awareness-raising programme;
- carry out the necessary checks;
- ensure that no one can suffer retaliation of any kind for having provided, in good faith, news of possible violations of the CoC, guaranteeing the right to confidentiality.

HUMAN RESOURCES

Human resources are an indispensable element for the existence, development and success of Fondall, which pays attention to the enhancement, protection and development of the skills and competences of all its employees, so that they can express their potential and professionalism at the highest level and contribute to the achievement of objectives in compliance with the commitments of social and environmental responsibility defined by Fondall.

Fondall offers all employees equal employment opportunities, depending on their characteristics and professional skills, without any discrimination. To this end, Fondall undertakes to:

- select, hire, pay, train and evaluate employees on the basis of criteria of merit, competence and professionalism, without any political, trade union, religious, racial, language and sex discrimination;
- ensure a work environment based on loyalty, collaboration, mutual respect and trust;
- offer working conditions that are adequate with respect to safety and health, as well as respectful of the personality of all, so as to promote relationships free from prejudice;
- intervene in case of attitudes not in line with these principles;
- ensure that illegal child labour is not used in the performance of activities;
- ensure that trafficking in human beings, including forced or compulsory labour, is not permitted;
- ensure that working hours comply with applicable laws;
- recognize the right of its employees to form representative bodies and participate in collective bargaining on working conditions;
- counter any form of intimidation, hostility, isolation, undue interference or conditioning, sexual harassment.

Each manager must involve his collaborators in the performance of the work and in the achievement of the assigned objectives. Employees, on the other hand, must participate in a spirit of collaboration and initiative.

PRIVACY

In compliance with the provisions of law, Fondall is committed to protecting the privacy of information relating to the private sphere and the opinions of each of its employees and collaborators and, more generally, of those who interact with the company.

PRINCIPLES OF CONDUCT

COMPLIANCE WITH LAWS AND REGULATIONS

Laws, norms and directives are the basis of all Fondall's activities. These rules must be respected. Rapid evolutions or regulatory changes can require considerable efforts to adapt to the business organization. All personal behaviour that may negatively affect the image of Fondall is censored.

FAIRNESS AND TRANSPARENCY

Fondall must be managed according to the principles of transparency and in compliance with legal obligations. In addition, Fondall must be managed in such a way that the preservation of its assets and interests is pursued.

CONFLICT OF INTEREST

All employees of Fondall must act exclusively in its interest by avoiding situations or relationships that create contrast between their interest and that of Fondall.

PREVENT THE RECEIVING, LAUNDERING AND USE OF MONEY, GOODS OR UTILITIES OF ILLICIT ORIGIN, AS WELL AS SELF-LAUNDERING

Fondall prohibits its staff to:

- purchase, replace or transfer money, goods or other utilities in the knowledge of the criminal origin of the same; or carry out other operations in relation to them, in such a way as to hinder the identification of their criminal origin;
- replace or transfer money, goods or other benefits deriving from crime or perform in relation to them, other operations in such a way as to hinder the identification of their criminal origin;
- use in economic or financial activities money, goods or other utilities in the awareness of the criminal origin of the same.

Fondall undertakes to carry out an adequate verification of the commercial and professional reliability of suppliers, customers and partners, in order to verify their respectability and the legitimacy of their activity.

PREVENTING CORRUPTION

Fondall censors any behaviour that may constitute an act of corruption.

CUSTOMER RELATIONS AND FREE COMPETITION

The choice of supplier and the purchase of goods and services must be made in compliance with the principles of competition and on the basis of objective assessments relating to the competitiveness, quality, usefulness and price of the supply.

During the selection phase, Fondall adopts objective and transparent criteria without precluding any supplier company, in possession of the required requirements, the possibility of competing to win a contract.

In the management of the relationships we will provide:

- establish efficient, transparent and in line with commercial customs;
- formalize and document the reasons for the choices;

- obtain constantly suppliers collaboration ensuring the most convenient ratio between quality, cost and delivery times;
- not to pursue personal gain by accepting advantages or a particular convenience in supply operations;
- require the application of the contractual and legal conditions provided.

The conclusion of a contract with a supplier must always be characterized by extreme clarity and must avoid any possible form of abuse.

Fondall asks its suppliers to behave in a manner that is law-abiding and in line with this CoC for the entire period in which they will provide products and/or services. In particular, the following points are highlighted:

- respect and enhancement of human resources;
- that illegal child labour is not used in the performance of activities;
- ensure that trafficking in human beings, including forced or compulsory labour, is not permitted;
- ensure that working hours comply with laws;
- provide adequate working conditions from the point of view of safety and health;
- recognize the right of its employees to form representative bodies and participate in collective bargaining on working conditions.

Different behaviours can be considered serious breach of the duties of correctness and good faith in the execution of the contract and just cause for termination of contractual relationships.

RELATIONS WITH EXTERNAL COLLABORATORS

Fondall selects external collaborators with impartiality and independence exclusively on the basis of competence and professionalism. Fondall expects external collaborators to behave in line with the principles of this CoC, about which they have been informed by Fondall itself. Different behaviours can be considered serious breach of the duties of correctness and good faith in the execution of the contract, reason for damage to the fiduciary relationship and just cause for termination of contractual relationships.

MANAGEMENT AND USE OF INFORMATION TECHNOLOGIES

Under no circumstances is it allowed to use computer and network resources for purposes other than work, as well as to commit or induce the commission of crimes, damage or alter Information Systems and information of third parties or illegally obtain confidential information.

No one is allowed to install unlicensed software on Fondall's computers or use and/or copy copyrighted documents and material.

MANAGEMENT OF INTELLECTUAL AND INDUSTRIAL PROPERTY

Fondall adopts measures and initiatives aimed at protecting its intellectual property and not violating that of others. In particular, Fondall is committed to:

- use exclusively ideas of which it has exclusive ownership;
- use trademarks of exclusive ownership and / or whose use is within the availability of Fondall through a legitimate title to use.

Under no circumstances is it allowed to:

- counterfeit or alter patents, trademarks and distinctive signs, domestic or foreign, of other people's industrial products;
- use, in any form or manner, trademarks, patents, names and other distinctive signs of which Fondall does not hold exclusive ownership and / or legitimate title to use;
- commercialize intellectual works or industrial products, with patents, trademarks or distinctive signs designed to mislead the buyer about the origin, provenance or quality of the work or product.

USE OF COMPANY EQUIPMENT AND FACILITIES

Fondall's corporate assets are used for service purposes, in accordance with current legislation. All employees must correctly use the equipment, safety devices, means of transport and other work equipment and must immediately report to the employer any dangerous conditions, working directly, in case of emergency, within the scope of their skills and possibilities.

In no case is it allowed to use company assets for purposes contrary to mandatory rules of law, public order or morality, or in any case aimed at racial intolerance, the exaltation of violence or the violation of human rights.

USE AND DISCLOSURE OF INFORMATION

With regard to the management of information, all Fondall personnel must scrupulously keep company information of any kind.

CONFIDENTIALITY

The duty to confidentiality must always be observed in relations with strangers to Fondall. Fondall prohibits and condemns any form of undue disclosure without specific authorization from management.

ACCOUNTING TRANSPARENCY

In the keeping of documentation and accounting records, the principle of truth, correctness, clarity and completeness of information must be respected.

PROTECTION OF HEALTH, SAFETY AND ENVIRONMENT

Fondall supports the compatibility of its activities with the territory and the surrounding environment as a primary element for the achievement of its objectives. Therefore, Fondall is committed to ensuring that its company is respectful of the health, safety of employees and third parties, as well as the environment.

With the active contribution of all employees, Fondall supports and applies initiatives aimed at minimizing risks and removing causes that may endanger the safety and health of employees, as well as those who are present in the territory where its business is located. In fact, Fondall:

- guarantees a continuous commitment to improve its performance with respect to the environment with the reduction of emissions into air, water and soil and a responsible and conscious use of natural resources;
- before starting innovations to its production processes, it assesses the environmental and social impacts;

- develops a relationship of constructive collaboration, based on maximum transparency and trust, both internally and externally, in dealing with aspects related to health, safety and environment;
- maintains high safety and environmental protection indices, through the implementation of management systems developed and certified according to recognized standards;
- develops a continuous flow of information, awareness and training directed to its employees.

With this in mind, Fondall is the place where the smoking ban is implemented in all indoor workplaces. Confirming the importance that Fondall places on the protection of health, safety and environment, the evaluation of personnel performance takes into account whether or not the behaviour of the same is consistent with the company's policies.

SANCTIONING SYSTEM

The call for compliance with all legal regulations by each employee in the performance of their work is a central element of this CoC.

Failure to comply with the CoC requires the application of sanctioning procedures provided for by the rules themselves or by laws. Compliance with the CoC must arise from the sharing of the values contained in it.

REPORTS

All employees, at any time, can and are required to report to the Management any violation of this CoC.