

Fida Srl

CODE OF ETHICS

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FOREWORD

Fida Srl is aware that the authority of a company is recognised not only by the competence of its collaborators and the high quality of the service provided to customers, but also by the attention paid to the needs of the entire community. The principles that have always inspired the work of this Company are formally collected in a Code of Ethics of Conduct in the conviction that reliability is built daily by respecting standards and valuing people.

This Code of Ethics therefore represents a distinctive and identifying element in relation to the market and third parties, the knowledge and sharing of which, required of all those who work in the Company or collaborate with it, constitute the foundation of our activity and the first step towards the pursuit of our *vision*.

The objective is therefore to pursue excellence in the market in which it operates, through Sustainable Development, safeguarding the Environment, Health and Safety of the people involved through the consistency of a behaviour respectful of Social Ethics and Gender Equality, achieving satisfaction and ensuring added value for the Employee, for the Customer and, in general, for the Community.

In addition, the organisation, management and control model pursuant to Legislative Decree 231/2001 was also introduced.

PURPOSE AND ADDRESSEES

This Code of Ethics (hereinafter, the "**Code**") illustrates the set of ethical and moral principles that underlie the activities of Fida Srl (hereinafter, the "**Company**") as well as the lines of conduct adopted by the Company both within its business (in relations between employees) and externally (in relations with institutions, suppliers, customers, business *partners*, political and trade union organisations and information bodies (hereinafter, the "**Stakeholders**").

Respect for these principles is of paramount importance to achieve the company's mission and to ensure its reputation in the socio-economic context in which it operates.

First of all, we would like to point out that Fida Srl firmly believes that every activity must be carried out ethically, recognising itself in the principle enshrined in Article 41 of the Constitution, according to which private economic initiative "cannot be carried out in contrast with social utility or in such a way as to damage security, freedom and human dignity.

This Code is binding for the Company's directors and employees, as well as for all those who work and collaborate, on a permanent or temporary basis, on behalf of the Company (hereinafter, the "**Addressees**"). The Code will be widely disseminated within the internal governance structure, and widely communicated externally, also through its website; it also undertakes to adopt any further provisions so that they can be disseminated and applied the principles and the Code prescriptions.

1. GENERAL PRINCIPLES

The conduct of the Addressees, at all levels of the company, is marked by the principles of legality, fairness, non-discrimination, confidentiality, diligence and loyalty.

1.1 Legality

The Company operates in absolute compliance with the law and this Code.

All Addressees are therefore required to comply with all applicable regulations and to constantly update themselves on legislative developments, also by taking advantage of the training opportunities offered by the Company.

The Company considers transparency in financial statements and accounting a fundamental principle for the conduct of its business and for the protection of its reputation.

1.2 Correctness

Fairness and moral integrity are an unfailing duty for all Addressees.

The Addressees are bound not to establish any privileged relationship with third parties that is the result of external solicitations aimed at obtaining improper advantages.

In the performance of their activities, the Addressees are bound not to accept donations, favours or benefits of any kind (except for objects of modest value) and, in general, not to accept any consideration for the purpose of granting advantages to third parties in an improper manner.

In turn, the Addressees must not make donations of money or goods to third parties or in any case offer unlawful benefits or favours of any kind (except for objects of modest value or commercial courtesy gifts authorised by the Company) in connection with the activity they perform for the benefit of the Company.

The intrinsic conviction of acting in the interest of the Company does not exonerate the Addressees from the obligation to observe the rules and principles of this Code punctually.

1.3 Non-discrimination and equal opportunities

In its relations with Stakeholders and in particular in the selection and management of personnel, work organisation, choice, selection and management of suppliers, as well as in relations with Bodies and Institutions, the Company avoids and repudiates any discrimination concerning age, sex, race, sexual orientation, state of health, political and trade union opinions, religion, culture and nationality of its interlocutors; at the same time, it favours integration, promoting intercultural dialogue, and the protection of the rights of minorities and weak subjects.

1.4 Confidentiality

The Company is committed to ensuring the protection and confidentiality of the personal data of Recipients and Stakeholders, in compliance with all applicable data protection regulations.

The Addressees are bound not to use confidential information, learnt in the course of their work, for purposes unrelated to the exercise of that activity, and in any case to always act in compliance with the confidentiality obligations assumed towards all Stakeholders.

In particular, the Addressees are bound by the strictest confidentiality on documents disclosing know-how, transport information, business information and corporate transactions.

1.5 Diligence

The relationship between the company and its employees is based on mutual trust: employees are, therefore, required to work to further the interests of the company, in compliance with the values set out in this Code.

The Addressees must abstain from any activity that may conflict with the interests of the Company by renouncing the pursuit of personal interests that conflict with the legitimate interests of the Company.

In cases where the possibility of the existence of a conflict of interest may arise, Addressees are required to refer, without delay, to their hierarchical superior so that the company may assess, and possibly authorise, the activity potentially in conflict.

In cases of violation, the Company will take all appropriate measures to put an end to the conflict of interest, reserving the right to act for its own protection.

1.6 Loyalty

The Company and the Recipients are committed to fair competition, in compliance with national and EU regulations, in the knowledge that virtuous competition is a healthy incentive for innovation and development processes, and also protects the interests of consumers and the community.

1.7 Awareness and culture

The company supports and values equality, diversity and inclusion in its daily activities, making every effort to create an inclusive culture. It is committed to raising awareness of unconscious biases and providing its resources with the tools to overcome them in decision-making processes. It also includes in its leadership model the ability to work with all types of cultures and fully supports its leaders in managing diverse groups and promoting an inclusive work environment.

1.8 Language

It is required to use, at all levels, in both internal and external communication, a language (written, spoken and gestural) that is polite, respectful and inclusive, which takes into account the subjective perception of each person and the possible variables of the identity and personal sphere of each person, preventing the use of inappropriate and potentially discriminatory expressions.

The use of neutral language is recommended whenever possible.

1.9 Training

Organised training must ensure equal and equal participation in training and development courses, including leadership courses, with the presence of both sexes.

The planning of training courses, at all levels, must be guided by the principles of inclusion and equality, including those against gender-related prejudices and stereotypes.

Provide specific training at all levels, with defined frequency, on 'zero tolerance' of all forms of violence against staff, including sexual harassment in any form.

2. RELATIONS WITH EMPLOYEES AND COLLABORATORS

2.1 Personnel Selection

Personnel assessment and selection are carried out according to fairness and transparency, respecting equal opportunities in order to match the Company's needs with the candidates' professional profiles, ambitions and expectations.

The Company undertakes to adopt all useful measures to avoid any form of favouritism in the personnel selection process by using objective and meritocratic criteria, respecting the dignity of the candidates as well as in the interest of the good performance of the company.

The personnel recruited, also through the implementation of this Code, receive clear and correct information about their roles, responsibilities, rights and duties.

2.2 Personnel and career management

The Company protects and enhances its human resources, striving to maintain constant the conditions necessary for the professional growth, knowledge and skills of each person, carrying out appropriate training for professional updating and any initiative aimed at pursuing this purpose.

The company promotes the participation of workers in the life of the company, providing participatory tools capable of gathering workers' opinions and suggestions, guaranteeing their widest participation.

Without prejudice to the utmost helpfulness towards the Company, no worker may be obliged to perform tasks, services or favours that are not due according to his or her contract of employment and role within the company.

The Company is firmly committed to opposing episodes of *mobbing*, *stalking*, psychological violence and any behaviour that is discriminatory or harmful to personal dignity inside and outside company premises. Relations between employees must be conducted with loyalty, fairness and mutual respect, in compliance with the values of civil coexistence and personal freedom.

Fida Srl is an inclusive and non-discriminatory employer. Talent diversity increases the ability to create the conditions for process improvement and customer loyalty. This applies not only at the time of recruitment, but also in all policies relating to training, internal promotion and general working conditions, as well as in relations with suppliers, customers, business partners and others.

The company pays particular attention to:

- develop an inclusive culture in which everyone is first and foremost aware of their uniqueness,
- respect differences and accept diversity,
- facilitate the professional integration of people with disabilities,
- combating all forms of discrimination (related to age, gender, disability, living status, sexual orientation, political or philosophical opinions, religious beliefs, trade union activities, ethnic, social, cultural or national origins, etc.), support and promote all actions and programmes developed in the field of diversity.
- favouring and enhancing diversity in a broad sense that brings value and new impetus in all sectors and areas of the company. It has been proven that the presence of people of different genders and, in a broader sense, of different cultures opens up new ideas to innovative solutions and positive competition between staff and work groups.

2.3 Working Environment

The Company is committed to providing its staff with a healthy, safe working environment that respects their dignity, and takes action against any behaviour that is inappropriate or contrary to these principles, including harassment, intimidation, threats, coercion and insults.

Safety in the workplace is ensured both by strictly implementing the provisions of the law in force and by actively promoting a safety culture through specific training programmes. Staff training is a central element of the management system adopted.

The company protects the health of its workers, also ensuring compliance with hygiene and preventive health regulations.

2.4 Salary Equity and Remuneration

Wage and salary equity is guaranteed without any discrimination.

A control mechanism is in place to avoid practices that do not correspond to the stated non-discriminatory policies, including salaries, benefits, bonuses, welfare programmes (if any).

Periodic information to all personnel on the remuneration policies adopted in the company, also with reference to any benefits, bonuses.

2.5 Parenting, Family Care

It is planned to define initiatives, beyond the relevant CCNL, dedicated to maternity/paternity protection and services to facilitate the reconciliation of personal and working life times. The Personnel Department is available to illustrate the initiatives available (e.g. Smart-Working) and how to access them.

Initiatives are envisaged to support the sharing of family responsibilities and the removal of potential obstacles (maternity, paternity, elderly care, etc.) and career development.

Specific programmes are set up for maternity or paternity leave (e.g. training programmes for reintegration).

Communication about any important changes that occur at the workplace during the leave.

A plan for the management of the different stages of motherhood (before, during and after) is planned. An information system aimed at encouraging the application for paternity leave is envisaged.

Specific initiatives are planned to support staff returning from parental leave (training, support), including possible 'engagement' plans to be offered on a voluntary basis to women on maternity leave.

Planning is foreseen for the provision of specific services such as company crèches, after-school care for children or during school holidays, vouchers for children's sports activities, etc.

2.6 Work-life balance

In order to foster equal opportunities, the promotion and adoption of initiatives aimed at reconciling working and living times is envisaged.

Variable shifts, flexible working hours, possibility of Smart-Working.

Simple and accessible procedures are defined, with a request to the Personnel Department to use them, and a periodic review of staff flexibility needs is carried out.

Ensuring that business meetings are held at times compatible with the reconciliation of family and personal life times and that part-time staff and staff with flexible, discontinuous work contracts, etc. may also attend.

3. ENTERPRISE MANAGEMENT

3.1 Compliance with internal procedures

The Company believes that management efficiency and a control culture are indispensable elements for achieving its objectives. Recipients are required to strictly comply with the company's internal procedures and instructions and must act in accordance with their authorisation profiles, and must keep all appropriate documentation to keep track of the actions undertaken on behalf of the company.

3.2 Accounting management

In their accounting management activities, the Addressees are required to act in compliance with the principles of truthfulness, accuracy and transparency, so that the Company's reputation is protected both internally and externally. Compliance with these principles also enables the Company to plan its operational strategies on the basis of its real economic and asset situation.

All entries in the accounts must therefore be supported by complete, clear and valid documentation, avoiding any form of omission, falsification and/or irregularity.

In the case of balance sheet or profit and loss items based on valuations and estimates, the recording thereof must be guided by criteria of reasonableness and prudence.

3.3 Heritage protection

The Recipients exercise their duties by seeking to rationalise and contain the use of company resources: they are required to correctly apply security provisions in order to protect *hardware* devices from unauthorised access, which could seriously infringe the personal data protection rights of staff and customers.

3.4 Communication

The Company provides Stakeholders with suitable communication tools through which they can interact with the company to forward requests, ask for clarifications or make complaints. It promotes effective corporate communication capable of putting the company in contact with civil society, in order to acknowledge instances, needs and requirements of the community and to disseminate its values and mission.

Information disseminated to Stakeholders shall be complete and accurate in order to enable recipients to make correct and informed decisions.

The advertising promotion respects ethical values, protecting minors and repudiating vulgar or offensive messages.

3.5 Organisation, management and control model pursuant to Legislative Decree 231/2001

The document accompanied by its annexes is the organisation, management and control model (hereinafter MOC) pursuant to Legislative Decree no. 231 of 8 June 2001 (hereinafter the "Decree") adopted by Fida Srl with a resolution of its Board of Directors scheduled on 08/06/2020 and which will have to be updated according to the introduction of new offences by the legislator and/or organisational changes within the company.

By adopting this MOC, the Company intended to implement the prevention of the offences sanctioned by the Decree and subsequent updates. Furthermore, since 2013 Fida Srl has implemented an internal organisational system in compliance with the international standard requirements of ISO 9001, in 2017 an environmental management system in compliance with ISO 14001 and a safety management system in compliance with ISO 45001. Furthermore, since 2000, it has obtained the qualification certificate for the execution of public works (SOA).

In further upholding the values contained in the MOC, the Company wishes to integrate the specific requirements of Legislative Decree 231/01 by declaring all the deontological principles of the Company on which it calls for compliance by all employees, collaborators, corporate bodies, consultants and suppliers.

The MOC is aimed at preventing the commission of unlawful conduct sanctioned by the Decree and contains prescriptions that must be complied with by all recipients of the Decree, in order to work towards the Company's exclusion from liability under Legislative Decree 231/01.

The establishment of the SB is formalised in the minutes of 15.10.2020.

4. EXTERNAL RELATIONS

4.1 Relations with Authorities and Public Administrations

Relations with the Authorities and the Public Administration must be characterised by the utmost clarity, transparency and cooperation, in full compliance with the law and according to the highest moral and professional standards.

The Addressees, unless expressly authorised, cannot relate in the name and on behalf of Fida Srl with the Authorities and the Public Administration.

In relations with Public Officials, Persons in Charge of a Public Service, and the Public Administration in general, the authorised Addressees shall abide by the highest levels of correctness and integrity, refraining from any form of pressure, explicit or veiled, aimed at obtaining any undue advantage for themselves or for Fida Srl. In this regard, the authorised Addressees will be required to strictly comply with the provisions of this Code, as well as, more generally, with the directives issued by Fida Srl's management.

4.2 Relations with political and trade union organisations

The Company does not favour or discriminate against any political organisation or trade union: the Company refrains from making any undue contribution in any form whatsoever to parties, trade unions or other social formations, except for specific derogations and in any case always within the limits of what is permitted by the laws in force.

The Addressees are required to refrain from any direct, indirect or boastful pressure on political or trade union representatives.

4.3 Relationship with customers and suppliers

The Addressees shall deal with third parties with courtesy, competence and professionalism, in the conviction that the protection of the company's image and reputation, and consequently the achievement of the company's objectives, depends on their conduct. In particular, Addressees must abstain from any form of unfair or deceptive behaviour that may lead customers or suppliers to rely on unfounded facts or circumstances. The Addressees are required to make constant efforts to offer punctual and high quality services to customers, seeking to limit any form of disservice or delay in order to maximise customer satisfaction. Relations with suppliers are characterised by loyalty, fairness and transparency.

The suppliers and partners who collaborate with Fida are chosen not only for the reliability of their services and products, but also for ethics and correctness in their relations, as well as an indispensable attention to the environment and the health and safety of their workers. Our suppliers must therefore be open to possible audits at their sites in a climate of openness and dialogue with their customers and a search for continuous improvement.

On the basis of these premises, the Company expects its suppliers and subcontractors to comply with the relevant environmental regulations (correct waste management and disposal through authorised and appropriate channels, management of emissions into the atmosphere in accordance with current legislation, authorisation of industrial discharges, etc.) and health and safety (compliance with Legislative Decree 81/08 and related legislation).

For Fida Srl (a company certified for the environment according to ISO 14001:2015 and for health and safety according to ISO 45001:2018), it is also essential to demonstrate an eco-sustainable approach in the design of services and products, favouring the choice of raw materials and substances with a low environmental impact and limited risk for the people who use them.

For this reason, the company invites its suppliers and partners to discuss and share with the company the choices and decisions on procurement and processing methods, in order to identify the best solutions that, for the same result, can also be eco-friendly, taking into account the safety of workers.

5. INTERNAL CONTROL SYSTEM

Compliance with the provisions of this Code is entrusted to the prudent, reasonable and careful supervision of each of the Addressees, within their respective roles and functions within the company. All Addressees are invited to report to their direct superiors any facts and circumstances potentially in conflict with the principles and prescriptions of this Code. The *management* of Fida Srl and the bodies in charge will take every necessary measure to put an end to violations, being able to resort to any disciplinary measure in compliance with the law and workers' rights, including trade union rights.

6. GUIDELINES OF THE SANCTIONS SYSTEM

The internal control system is geared towards the adoption of tools and methodologies aimed at countering potential corporate risks, in order to ensure compliance not only with the law, but also with internal provisions and procedures. In fact, the violation of the principles set forth in the Code and in the procedures indicated in the internal controls compromises the fiduciary relationship between the Company and its directors, employees, consultants, collaborators in various capacities, customers, suppliers, commercial and financial *partners*. These violations will therefore be immediately pursued by Fida Srl in an incisive and timely manner, through the adoption of suitable and proportionate disciplinary measures. The effects of violations of the Code of Ethics and internal protocols must be taken into account by all those who, for any reason, have relations with Fida Srl

Depending on the seriousness of the conduct of the person involved in one of the unlawful activities provided for by the Code, Fida Srl will take the appropriate measures without delay, regardless of any criminal prosecution by the judicial authorities.

Without prejudice to the foregoing, conduct in breach of the Code of Ethics constitutes:

- serious breach for employees (blue-collar workers, white-collar workers, middle managers and executives), with the sanctions, applied depending on the seriousness, provided for by the CCNL for the category (verbal reprimand, written reprimand, fine not exceeding three hours' pay, suspension from work and from pay up to a maximum of three working days, dismissal for just cause or justified reason); if criminal proceedings are pending or if a measure restricting personal liberty is taken against the employee, before adopting the disciplinary measure, the sanction of suspension from work and pay may be adopted, for the duration corresponding to the outcome of the criminal proceedings or until the end of the measure restricting personal liberty;
- just cause for revocation of the directors' mandate;
- cause for immediate termination of the relationship, in the most serious cases, for external collaborators and para-subordinates;
- cause for immediate termination of the relationship, in the most serious cases, for suppliers, contractors and subcontractors. The identification and application of sanctions shall always take into account the general principles of proportionality and appropriateness with respect to the alleged violation.

In all the aforementioned hypotheses, Fida Srl also reserves the right to exercise all the actions it deems appropriate to claim compensation for damages suffered as a result of behaviour in violation of the Code of Ethics.