



"Servizi PARMA CULTURA 2020" to "MEDIOPANA SERVICES®"

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"ETHICS CODE"

EDITION 2019 2020

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Introduction

ETHIC CODE

MEDIOPADANA SERVICES[®] by ITALIA GESTIONI srl.s.

(hereinafter, is "**MP.SS**[®]. "ID" or Society o Company") is a public and private mixed capital company established in by one



capital of Society (srl.s. srl. Spa. o with successive amendments brought by the Camerale certificate. This present "**Ethic Code**" is contained in the act of lawyer article of 12.30.2013 - article 2 – of social purpose **MP.SS[®]**. **ITALIA GESTIONI srl.s.** Has as purpose according to Reggio Emilia certificate **CCIAA** the implement Of National and International Internet for territory publicity and the service predisposition for merchandise and persons, guesthouses and hostel, the restoration, logistic the certificate chamber of Commerce of Reggio Emilia the construction of internet platforms and national International prices for advertising planning and logistics service predispositions general goods and people, the guesthouses in general, catering and general administration, parking management and car rental with or without driver, shuttle services to tourist fair institutions in general, promote national and international events, organize works preparation, exhibition and the construction site, work on responsiveness, the work of technological nature is all the activities of the organization and event management (with appropriate authorizations if necessary).

The **GV** station (High Speed) **MEDIOPADANA** of Reggio Emilia will be a powerful tool for the influx of people who will give visibility of our tendency to creativity and innovation of Territory in the way of Land, food processing, Agro industrial, Industrial, Mechanic, Green Technology and Education (International center Loris Malaguzzi), collecting issues and



in reference to the event of the , **Servizi PARMA CULTURA 2020**, repurposing them in the light of new global scenarios, whose center is the theme of the right to a healthy, safe and sufficient food, security of our planet.

The National **MP.SS.** soc. context. in which the company is to act, the complexity of the subject and logistics stakeholders in the corporate sector (the "stakeholders") have made it necessary to define the principles, values and responsibilities as MS soc recognizes, shares and intends to promote, to help achieve a better future for all.

For these reasons, it has been introduced the Ethic Code (hereinafter in shortness, also the Code), the observance of which the Directors, any auditors, employees, including managers, and employees of **MP.SS**®. each within their own functions and responsibility, is of fundamental importance for the reputation and success of **MEDIAPADANA SERVICE**® by **ITALIA GESTIONI** srl.s.

The rules contained in the Code are then valid for that **MP.SS**®. personal and for all those who, for whatever reason, maintain contract relationship and e/o work, even occasionally, with the same Company.

The **MP.SS**®. personal is committed to promoting, within and outside the Company, inspired actions by the principles contained in this Code and to respect the rules of these principles and to take - to this end -each appropriate, an action that favors **MP.SS**®. people engage actively promote the Code of Ethics Cosenza **Stakeholders**.

The **MP.SS**®. "IG" soc. MONITORING Council shall act as the guarantor of the Conduct Code (the "**Guarantor**").



Adoption of the Code is a manifestation of the commitment of the Company, including in relation to the prevention of offenses under **D.Lgs.8 June 2001 n.231** (successive emanations) on the administrative responsibility of the company, and is an integral part of the organizational model in which the Company has in mind the same Law Decree.

The Code is available and can be downloaded from the website of the Company (Society).

<http://www.mediopadanareggioemilia.it> www.parmacultura2020.com

Ok above.

I. Principles e Values

Compliance with laws and regulations, statutory provisions and this Code constitute a commitment and a duty of all the People of MS; and to all those who for whatever reason, contractual relations and / or work, even occasionally, with the same Company.

To this end, **MP.SS[®]**. “**IG**” soc. is committed to maintaining a system of governance in accordance with best international practice standards, able to manage the complexity of the context in which the Company is required to operate.

The activity of **MP.SS[®]**. “**IG**”soc. must be carried out within a framework of transparency, honesty, fairness, good faith and according to the rules of conduct in this Code.

Done to give effect to its objects, **MP.SS[®]**. “**IG**”soc. rejects all forms of discrimination and corruption, and refers to the protection and



promotion of human rights, civil and political rights, social rights, economic and cultural.

MP.SS[®]. "IG" soc. recognizes and protects the dignity, freedom and equality of human beings, labor protection and liberal syndical, the health, environment and biodiversity, as well as the system of values and principles on transparency, efficiency energy and sustainable development, as outlined in the **Universal Declaration of human Rights of United Nations and the United Nations Declaration on the Property Integrity and Transparency in the conduct of international business and Finance**, adopted by the **OECD** Ministerial Council on 28 May 2010.

All . **MP.SS.[®]** persons without exception act in accordance with the principles and content of the Code, aware that compliance with the Code is fundamental demanded professional performance. Relations between the **MP.SS.[®]** . people at all levels should be based on criteria and behaviors of honesty, fairness, cooperation, loyalty and mutual respect.

II. BEHAVIOUR RULE

2.1. Integrity

Everyone, employee, or even occasional of the company must prove its integrity or honesty and respect for the law, fairness and respect of his colleagues and the people with whom it has business relationships.

In particular, relations between colleagues must be mutual respect sealed by transparency, fairness and good faith, and sharing and ethical principles of this Code.



2.2. Responsibility

Everyone, employee or contractor of the Company must respect rules of this present Code and, in the case where these rules violated or are placed in conduct contrary to the principles of Code, it is urgent to notify it immediately to the Guarantor.

2.3. Sensitization

The heads of executive **MP.SS.** [®] **“IG”soc.** departments must be moral role models and should ensure that business decisions are suitable for both legal and ethical issues. They are committed to creating and maintaining a working environment in which it is clear that all must act in accordance with the rules and ethical principles of this Code.

2.4. Tutor of privacy

MP.SS. [®] **“IG”soc.** in the exercise of its activities protects the personal information of its employees and contractors, as well as its subcontractors, avoiding any misuse of the information acquired, as required by the law and emanation internal procedures of the company.

The privacy of **MP.SS.** [®] **“IG”soc.** employees and its subcontractors are protected adopting specific procedures that specify the necessary information to employees, employees and contractors of the Company and the methods of processing and storage.

And 'prohibits any opinion survey and in general, the privacy of employees and contractors.

The Company will monitor the data on Internet users (themes) acquired to be avoided identity fraud and all that notify organizations.



It is also prohibited, except as provided by law, to disclose and / or distribute personal information without prior consent.

Each employee or employee is required to protect the privacy and confidentiality of information collected in the course of their work and, in particular, to respect the confidentiality clauses required by the contracting parties.

All information, data and knowledge acquired, processed and managed by staff and employees for the year of their employment are the property of the Company and is strictly confidential and appropriately protected and cannot be shots often releases or disclosed 'inside or outside of the Company, except to the extent permitted by law or by company procedures.

Each dipendente e collaboratore must:

- a) Acquire and process only the necessary data directly related to its functions;
- b) Keep this information in order to prevent others to be aware;
- c) Communicate and disseminate data only in internal area procedures of the company;
- d) Ensure that there is no confidentiality constraints under any nature, relationships with third parties

2.5. Interest Conflict

Any situation that could potentially lead to a conflict between the interests of the Company and personal interest must always be avoided.



In case there is a conflict of interest, even potential, the person of MS shall promptly inform the Guarantor, which will evaluate each case, the real existence.

Furthermore the **MP.SS[®]S.** people are invited to give information on activities outside of work hours when they may appear to conflict of interest with **MP.SS[®].** **"IG"soc.**

2.6. Accountant Documentation

MP.SS. [®] "IG"soc. operates ensure full transparency of the choices made by offering its shareholders all the information necessary to enable them to make decisions within their competence.

The accounting registrations must be manufactured, stored, and transmitted with greater accuracy and honesty. Each record must reflect exactly what is shown by the supporting evidence.

The area of the appropriate documentation is a responsibility that involves everyone in **MP.SS[®].** **"IG"soc**

Specific penalty provided to false claims on an expense report or change the time sheets, increase or artificially reduce the assets and liabilities that do not respect the principles of accurate accounting and activity that inherent.

All accounting books, registrations, records and information required by the shareholders must report accurately and truth transactions and must comply with current accounting standards.

Documentation and business correspondence should be written in a clear, concise and truthful way.



Documents cannot be destroyed in the presence or in expectation of internal or external check up, or in its course. These operations must be carried out in full compliance with the regulations regarding the maintenance and registration of company documents and internal procedures of the company.

MP.SS. ® "IG" soc. has the obligation to report accurately and comprehensively the relevant facts concerning its activities. To better respond to requests for information on activities, programs and issues concerning the company that may be of public interest, all employees to whom the application must send the same requests to sales management and administration Finance and control.

The **MP.SS.®**. People, who become aware of omissions, falsifications, neglect of accounting or documentation on which the records accounting are omitted is invited to reporting it to the Guarantor.

2.7. Conservatorship Company

MP.SS.®. People have used or use the company's assets. Of these assets each employee has a responsibility to make a conscious, responsible and targeted use, only to the achievement of business activities. No good can be distracted from such purpose or use. Computer equipment cannot be used for access, transmission or receipt of material contrary to the principles and / or trade laws. Any unauthorized reproduction of software, books and other material protected by copyright is a violation which exposes the Company to liability and legal employees, aware of this, should not engage in activities under such circumstances. Therefore, it is forbidden to



engage himself in such behavior that result in theft, fraud, subtraction, distraction or diversion of any good business and / or delivered with it.

Each employee and / or collaborator of **MP.SS[®]**. "**IG**"**soc.** is necessary required to act with due diligence to protect corporate assets by acting responsibly and in accordance with the provisions of respective employment contracts and operating procedures governing the use, precisely documenting their use. In particular, each employee must:

- Use scruple and thrifty the Company assets entrusted;
- Evoid improper use of company assets that may cause damage or reduce efficiency, or otherwise be contrary to the interest of Company.

Each employee and / or employee is responsible for protecting company resources entrusted to it and has the duty to inform timely the supervisor of any threats or damaging events for the Company.

Every employee and / or employee is responsible for protecting the resources entrusted to him and the company has a duty to inform the supervisor of any threats or damaging events for the Company.

As for applications, **MP.SS[®]**. people are required to:

- Adopt corporate security policies, so as not to compromise the functionality and security of informatics systems;
- Do not send email messages threatening or insulting, do not use foul language or inappropriate comments that may offend the person and / or damage Society Image;
- Do not surf websites with modesty and offensive;



- The company has provided all transactions control server and Internet connections and the respective computer positions to ensure adequate security.
- use the computer system, exclusively for business purposes.

2.8. Reserve

People from M.S. as well as third parties who, for some reason, contractual relations with **MP.SS**[®]. **“IG”soc.**, are obliged to keep confidential all information relating to the design of the website and / or others, business plans, industry, new technologies and thematic strategic documents related to tendering procedures for the award of works, services and supplies and contracts of work documentation, services and furniture in relation of contractual documentation cannot be considered in the public domain; all financial and strategic transactions; the personal data of employees and collaborators.

Access to this information is restricted to employees and employees who really need to the extent strictly necessary for the exercise of their functions.

It is absolutely forbidden to all employees and collaborators to discuss private matters in public places and mobile.

The duty of confidentiality continues even if there is termination.

Confidential information cannot be used for personal gain.

MP.SS[®]. **“IG”soc.** further agrees to maintain the confidentiality of information and use this information in the conditions and as permitted by applicable laws. Similarly, contractors of the Company are required



to maintain the confidentiality with respect to information, documents and data relating to retired without **MP.SS**[®]. **"IG"soc.** or its partners and employees.

All **MP.SS**[®]. people are required to help maintain a sufficient level of business confidentiality, and to refrain from any behavior that may affect the confidentiality.

2.9. Gigts

There will be no form of gift that could even be interpreted as exceeding normal commercial practices or courtesy, or is intended to obtain favorable treatment in conducting any activity in **MP.SS**[®]. **"IG"soc.** In particular, any form of gift which may influence their judgment to ensure an advantage.

This rule concerns the gifts promised or offered and those received as it is intended to have any type of service. In all cases, . refrains **MP.SS**[®]. **"IG"soc** from unauthorized by law practices by code-so-known commercial and ethical companies or entities with which it has relations.

People from **MP.SS**[®]. who receive gifts or benefits beyond the allowed types are required, in accordance with established procedures, to notify the Guarantor, which will assess the relevance and will, if not, to inform policy the sender of the Company with respect.



2.10. Responsibility to shareholders

MP.SS[®]. "IG"soc. provides its shareholders with all relevant information available to guide investment decisions and resolutions of the company, ensuring the free and full access to all the documents necessary. In particular, the Company ensures that conditions for shareholders participation of in decisions within their competence is widespread and informed. **MP.SS[®]. "IG"soc.** further agrees to comply with the rules established by the shareholders in decision-making, management and exploitation in relations both inside and outside of the structure.

Decisions on the management of the Company must be taken in the exclusive interest of the Company and not on the basis of the interests and personal benefits. Must always avoid situations where the parties are, or may even appear only in conflict of interest, this means that when an employee has a different interest from that of the company and the balance of interests of *stakeholders* or personal benefit of the Company's business relationships, and the case in which the representatives of the contractors or public bodies act contrary to the duties of their own functions.

2.10. Operates ensure full transparency of the choices made by offering its shareholders all the information necessary to enable them to make decisions within their competence.

2.11. Actions must be manufactured, stored, and transmitted with greater accuracy and honesty. Each record must reflect exactly what is shown by the supporting evidence.



- 2.12. The area of the appropriate documentation is a responsibility that involves everyone in **MP.SS**[®].
- 2.13. Specific penalty for E today make false claims on an expense report or change the time sheets, increase or artificially reduce the assets and liabilities that do not respect the principles of accrual accounting and activity that inherent.
- 2.14. All books, records and information required by the shareholders must report accurately and truth transactions and must comply with current accounting standards.
- 2.15. Documentation and business correspondence should be written in a clear, concise and truthful.
- 2.16. Documents cannot be destroyed in the presence or in expectation an internal or external, or in its course. These operations must be carried out in full compliance with the regulations regarding the maintenance and registration of company documents and internal procedures of the company.

MP.SS[®]. "IG"soc. has the obligation to report accurately and comprehensively the relevant facts concerning its activities. To better respond to requests for information on activities, programs and issues concerning the company that may be of public interest, all employees to whom the application must send the same requests to sales management and administration finance and control.

- 2.17. People, who become aware of **MP.SS**[®]. omissions falsifications, neglect of accounting or documentation on which the records are based accounting, reporting to the Guarantor.



As for applications, **MP.SS[®]**. people are required to:

- Adopt corporate security policies, so as not to compromise the functionality and security of information systems;
- Do not send email messages threatening or insulting, do not use foul language or inappropriate comments that may offend the person and / or damage to the image society;
- Do not surf websites with modesty and offensive;
- The company has provided all transactions control server and Internet connections and the respective positions computer to ensure adequate security.
- use the computer system, exclusively for business purposes.

2.11. Responsabilité envers ses sous-traitants.

2.11. a) Premise

MP.SS[®]. "IG"soc. contractors commit to sign the Code and observe the principles and rules of conduct, with respect for the rules of the Code considered essential contractual obligations against . **MP.SS[®]**. "IG"soc

2.11. b) Procurement and Contracts sponsorship or similar.

MP.SS[®]. "IG"soc., Is the right of the certifying body for participation, or trusts and public / private contracts for works, supplies and services, as well as sponsorship contracts and contracts with them assimilability, based on respect and compliance with applicable community and national laws and in the matter.



The price and the execution of works and public works, supplies and services must ensure the quality of the services requested and conducted in accordance with the principles of economy and efficiency.

For this purpose, **MP.SS[®]**. **"IG"soc.** will:

- Ensure that all economic operators, on equal terms, equal participant's chances on the phases of the selection contractor;
- Require assurances to the economic participant's operators involved in the selection order and resources, including financial organization facilities, capacity, know-how, quality systems and adequate resources to meet the needs of the Company.

To ensure the integrity and independence in relationships with entrepreneurs, **MP.SS[®]**. **"IG"soc.** adopts the maximum transparency and efficiency in the procurement process, through:

- The separation of roles between the function that requires the execution of securities or the presentation of the services or the provision of goods and whoever reads his contract;
- The adoption of formalities to ensure proper documentation of decisions ("traceability steps acquisition process");
- The preservation of information and documents relating to the match officials or selection of suppliers, and contract documents for periods shipped by law.
- Also ensure that competent function and the employees:

- Do not inducing traders to enter a negative view contratto subsequent benefits;
- Do not accept gifts or other forms of benefit, not directly attributable to normal courtesy.

Furthermore, to ensure the accuracy of the tendering procedures, the Company commits member of the award tips:

- Ensure maximum transparency of transactions;
- Ensure equity in all stages of the proceedings;
- Maintain confidentiality of information not subject to disclosure; promptly report any possible or potential conflict of interest

2.11.c) Principi di condotta nei rapport con gli appalatori nella fase di esecution del contratto

2.11.d) Option appointment

The allocation of assignments professionals should always be based on the principles of competence, economy, and transparency, also evaluating the moral and professional integrity of the professionals in charge.

In particular, the costs and / or amounts of any kind paid caregivers to professional nature must be properly documented and proportionate to the work carried out, taking into account market conditions.

2:12. Relations with the Public administration



With the end of the term of the Public Administration (" the **P.A.**") is defined as persons, public or private, right that hold public office or a public service, with which the Company and its employees and collaborators interact (also for example, authorizations and / or concessions and / or acts of punishment, but labels).

The assumption of commitments and the management of relations with the **P.A.** are reserved exclusively for the services of the company and duly authorized staff. As part of the relationship, including relations noncommercial between

MP.SS[®]. "**IG**"**soc.** public administration and the recipients of this Code are required to abstain:

1. By offering, even through a third party, money or other benefits to the public official concerned, his family members and / or relatives of any degree, or parties in any way linked;
2. by the establishment (or attempt to set up) personal relationships favor, the influence of interference affecting, directly or indirectly, the results of the report.

2.13 Financing and subsidies

MP.SS[®]. "**IG**"**soc.** cannot take benefits of P.A. relations by setting up legal contractual relationships through measurements obtained legitimately or donations of any kind of providence and duly obtained for the purposes for which they are granted.

And forbidden to employees and / or **MP.SS**[®]. "**IG**"**soc.** associates get unfairly profits at the expense of the P.A. They will not have to:



- 1. Obtain, without doubt ?, plow MP.SS. contributions, subsidized mortgages or other funds of the same type in whatever they may be called, granted or issued by the Palestinian Authority, through the use or presentation of false documents or false, or omission of required information;**
- 2. Use grants or funding for MP.SS[®]. "IG" soc. for purposes other than those for which they are granted;**
- 3. Obtain any other kind of undue advantage for themselves or for MS soc., Or to third parties at the expense of direct public management with trickery or ticket.**

2.14 Rapporti con the Autorità di e con poteri ispettivi ordine pubblico

MP.SS[®]. soc. comes in law and favors, within the limits of its powers, the proper administration of justice.

In the exercise of his **MP.SS[®]**. "IG" soc activities. operates within a legal framework or correct to work with representatives of the Judiciary, the Police and public and any other Public Officer who has powers of inspection.

Relations with the Authorities are reserved exclusively for functions and competent positions in accordance with company procedures.

2.15. Abuse of power

MP.SS[®] who is to act as a public official or a public servant:



1. You must not abuse its quality or its powers to compel or induce someone to give or promise unduly to himself or for a third also on behalf
2. of **MP.SS**[®]. **"IG"soc.** money, gifts or other benefits in the hope of obtaining illegal benefits of the Company;

2. You should not receive or accept a promise of money, gifts or other benefits in its own name on behalf of a third party or MS soc. to perform, omit or delay an official act or perform or have performed an act of office or contrary to official duties by parties that win or can obtain benefits from the Company.

2.16. Institutional MP.SS[®]. "IG"soc relations.

M.S. is committed to:

- putting in place without any form of discrimination, stable communication channels with all institutional interlocutors landmark international, Community or territorial
- Pour représenter les intérêts et les positions des **MP.SS**[®]. **"IG"soc.** concernant transparente, rigoureuse et cohérente.

2.17. Economic relations with political parties, Syndical Unions and Associations

MP.SS[®]. **"IG"soc.** does not make contributions of any kind, directly or indirectly, to political parties, movements, committees and political organizations and trade unions, special interest groups, or their representatives or candidates, both in Italy and the abroad, except for contributions due on the basis of specific regulations.



2.18. Relations with the Press

MP.SS[®]. "IG"soc. ensures truthful, transparent and timely information.

Media relations are reserved exclusively for functions and managers specifically designated for this purpose; People of all **MP.SS[®].** must be agreed in advance with the Company's Communications Department information to media representatives, and / or on their **Web** sites and / or computer typically used, and the methods and procedures to observe. (In accordance with the rules **-FIEG-** Italian Federation of Newspaper Editors).

2.19 La fraude informatique (vol d'identité numérique) ET CONTRÔLE

MP.SS[®]. "IG"soc. will make use of a high-level control computer (electronic) (A computer electronic control system and telephone) to counter in any way, directly and / or indirectly, any form of illegality, the computer and / or "Telemaco", person concretized or excluded, and take all the better initiative to prevent and, in any case, to remove all obstacles hindering the regularity of the administration, internal information and everything is functional to the good performance of the society.

All in compliance with laws and regulations, and changes that could be adopted, any violation will be forwarded to PS supervisory bodies (Div State Police. Post) and / or NSFT Guardia di Finance (Financial Police Technology Special Fraud Unit) of expertise.

2.20. TÉMOINS

2.19. And Done prohibited influence persons who hold the role of witnesses in civil, criminal, administrative and tribunari.

2.20. III. Employee MEDIOPADANA SERVICES employees



3.1. Relations avec les employés et collaborateurs

MP.SS[®]. people are the indispensable factor in its success. For this reason, the Company protects and promotes human resource value to improve and strengthen professional skills.

Each head of a directive of the ministry is committed to improving human resources entrusted to it and ensures that:

- Each employee and / or collaborator, in any capacity, its end an adequate knowledge of the legal and regulatory framework within which they are to perform their duties;
- The professional activity takes place in a climate of motivation, participation and accountability, so that the implementation of best management policies, according to the award criteria, based on the principles of individual merit, without any discriminatory form.

Hierarchical relationship **MP.SS[®]**. **"IG"soc.** ensures that the authority of fairness and balance, avoiding abuse. In particular, the Company will ensure that the authorities do not lead to any exercise of power to harm the dignity and autonomy of employees and / or the employee and the organization of work choices

3.2. Work Relationship

MP.SS. [®] **"IG"soc.** is committed to maintaining the utmost diligence in respect and compliance with the rules governing labor relations by ensuring full respect of fundamental rights of employees and consultants, as well as its subcontractors for any reason.



. **MP.SS[®]**. **"IG"soc** maintains and applies rules to prevent and punish discrimination every justified issues of ethnicity, skin color, sex, country of origin, age, religion, health status, the marital status and any other condition that could be their employees or those investment selections to recruitment, the last will be evaluated on the basis of professional qualifications and demonstrated ability.

3.3. Protecting the health and safety of the workplace

MP.SS[®]. **"IG"soc**. is committed to maintaining a safe and healthy work environment for its employees and employees as well as for all other parties, as visitors or contractors of the Company, has access to the place of **MP.SS[®]**. **"IG"soc**.

All regulations regarding health and safety must be scrupulously observed, the pursuit of continuous improvement of health and safety at work.

Each employee and / or collaborator, as part of their duties, must be actively involved in the risk reduction process, environmental protection and public safety and health protection and safety for themselves, colleagues and others.

3.4. Personnel selection

The evaluation of candidates to be taken has to join a transparent and non-discriminatory regime, comply with the rules of the laws.

The information requested is strictly related to the credentials provided by the professional profile and skills, while respecting privacy and views of the candidate.



The function responsible for human resources appropriate measures to prevent or favoritism forms of sponsorship in the selection and recruitment.

MP.SS[®]. "IG"soc. not to sign contracts of employment or self-employment to employees of companies that audit **MP.SS[®].**

"IG"soc. , the revision accounting soc. itself, its parent, its control and associates, for 48 months following the expiry of the consulting agreement between the Member States and the audit firm, that is, from the end of the relationship contract between the employee and the auditing firm.

IV. Implementation and internal control for the implementation of the Ethic Code (Code of Conduct)

4.1. Reference structures for the implementation of the Code

The principles and content of the Code apply to **MP.SS[®]. "IG"soc.** people and the many activities of the Company. Competes primarily with the

Directors and management to ensure practical implementation of the principles and content of Code, by assuming responsibilities and represent with a behavior model for their employees.

The responsibility to implement the Code and to ensure for its full implementation and compliance is left to each level of the organizational structure of **MP.SS[®]. "IG"soc** .; consequently, all the People of **MP.SS[®].** , within their functions and responsibilities, promote the implementation of the Code and are actively committed to its full compliance.

4.2. Knowledge and communication of the Code

The code is brought to the knowledge of all employees and associates of **MP.SS[®].** **"IG"soc**, and its contractors, through innovative, specific forms of communication.

The violation of the principles and contents of the Code may constitute a breach of the primary obligations of the employment relationship or a disciplinary offense, with all legal



consequences also in order to the employment relationship, and result in damages to the same result.

4.3 Notifications

In order to ensure the effective of the Code, the Company guarantees to all thos "Supervisory Board at:

The signals can be transmitted to the Guarantor, by email at: or, by regular mail, at the address "Supervisory Board at:

Guarantor reports may be submitted by e-mail a garante@mediapadanaservice.re.it or "**MEDIOPADANA SERVICES®**".
ITALIA GESTIONI srl.s. Reggio Emilia Italy

reports on the envelope

Guarantor responsible for reviewing the information received to submit the case to be in the function of the company responsible for the application of disciplinary sanctions.

The Guarantor undertakes to ensure the confidentiality of the person making the statement, except as required by law.

4.4. Functions of the Guarantor

The Guarantor is entrusted with the task of:

- Promote the implementation of the Code and the issue of reference procedures; reports and propose to the CEO of the company the useful initiatives for a greater dissemination and knowledge of the Code;
- Promoting communication programs and specific training of persons of **MP.SS®**. "**IG**"soc. examine reports of possible violations of the Code by initiating proper inquiry procedures; action at the



request of the People reports of **MP.SS**[®]. ; in the case of news of possibly violations of the Code have not been properly dealt with or retaliation against people for having reported violations;

- Notifying to the competent structures the possible relevant audit results of the adoption sanctions.

II. Penalty system

5.1. Penalties

In the presence of an activity being in violation of this Code of Ethics, the Company

- Purchase of the results of investigations by the Guarantor and any counterclaims made to the person take appropriate action, regardless of any action by the judiciary.

Any violation of the Code committed by employees and / or collaborators will result in disciplinary action, proportionate to the offense, possible recurrence and the degree of guilt.

The provisions of the Code are also applicable to temporary workers who will be required to respect the principles and values. Violations of the Code of Ethics are penalized with disciplinary measures taken in relation to them by the respective companies of administration of the work in this are held on the basis of specific agreement contractual with **MP.SS**[®]. **"IG" soc.**

Relatively to administrators and syndicate unions, the violation of the Code may result in the adoption by the Board of Directors, respectively (or a representative) and the supervisory board, of proportionate



measures in relation to the severity of the violation committed, and including not excluding the termination of the mandate (of the fees to be earned) for just reason to be proposed to the shareholders. In this latter case, **MP.SS[®]**. **"IG"soc.** is right to perceive entitled to any damage suffered because of violation into being.

As for the contractors of the company, the violation of the principles and precepts of the Code may be sanctioned by the resolution of the contacts (the suspension of payments and / or emoluments, current contract in cautionary anticipative reason) to be the same, notwithstanding the right of M.S. soc. to claim compensation for damages suffered and as a result of such conduct.

R.M.

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