

MONTEVERDI S.r.l.

ETHICAL CODE

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1. INTRODUCTION

This Code of Ethics (hereinafter the "Code") is an official document of the company MONTEVERDI S.r.l. (hereinafter referred to as the Company) in which the general principles and the behavioral royalties to which positive ethical value is recognized are identified.

The Company conforms its internal and external activity to the respect of the principles contained in this Code, in the conviction that ethics is a value to be constantly pursued in the performance of its activity and that of the subjects that operate on its behalf.

As an element of application of the provisions of Article 6 of Legislative Decree 8 June 2001, n. 231, the Code integrates the regulatory framework to which the Company is subjected.

It also constitutes an instrument with which the Company, in the fulfillment of its mission, undertakes to contribute, in accordance with the laws and the principles of loyalty and fairness, to the socio-economic development of the territory and of citizens.

The Code is a document wanted and approved by the highest management of the company MONTEVERDI S.r.l. II Code intends to base the operations, behaviors and manner of action of the Recipients on correctness, fairness, integrity, loyalty and professional rigor, both in relations within the Company and in relations with external parties.

The Company also undertakes to recall the observance of the provisions of this Code in all the economic relations established by it. MONTEVERDI S.r.l. pursues the constant improvement of the quality of its services, activating, in compliance with current legislation, managerial and operational solutions capable of guaranteeing environmental protection and ecological balance, with a view to sustainable development and safeguarding the health and safety of citizens and their workers. The Code is a corpus of fundamental principles that inspire company activities, guiding the behavior of employees, collaborators and the sole Director (hereinafter referred to as "Subjects").

In particular, by way of example:

- the members of the Administrative Body also take into account the principles and values of the Code of Ethics in setting company objectives;

- employees and collaborators adapt their actions and behavior to the principles, values, objectives and commitments set forth in the Code of Ethics.

The Company has also set up an Organization, Management and Control Model, aimed at preventing the risks of committing crimes - in particular those envisaged by Legislative Decree 231/2001 and subsequent amendments - and at limiting any impacts, in the in the event that unlawful acts were committed by fraudulently evading the same.

The Code of Ethics is constituted:

- the general ethical principles that identify the reference values in company activities;
- the criteria of conduct towards each stakeholder, which provide the guidelines and rules to which the recipients of the Code are required to comply;
- the implementation mechanisms that outline the control system for the correct application of the Code of conduct and for its continuous improvement.

2. PRINCIPLES OF BEHAVIOR

2.1. Centrality of the person

The Company believes in people as an essential element in creating value and improving internal processes. It favors the development of professionalism and skills as a fundamental condition for common growth, encouraging initiative, teamwork and the ability to delegate.

2.2. Ethics and responsibility

The Company adopts ethically correct rules and behaviors in full respect of people and the environment and operates with a strong awareness of responsibilities from an economic, social, environmental and safety standpoint.

In carrying out the Company's mission, the conduct of all the recipients of this Code must be inspired by the ethics of responsibility.

The recipients of the Code are required to comply with current legislation; in no case is it permitted to pursue or realize the interest of the company in violation of the laws.

Every employee and / or collaborator must act fairly and in good faith, respecting the obligations contractually agreed and ensuring the services requested. He must

also know and observe the contents of this Code Ethical, basing its conduct on respect, cooperation and mutual collaboration.

It also requires the elimination of any and all discrimination. any possible conflict of interest between the employees and the company.

In fact, in carrying out any activity, the Company works to avoid incurring situations of conflict of interest, real or even merely potential. Among the hypotheses of "conflict of interest", in addition to those defined by the law, we also mean the case in which a Subject operates for the satisfaction of an interest other than that of the company in order to gain an advantage for himself or a third person.

2.3. Innovation

The Company pursues research and technological and organizational innovation in the belief that the adoption of these solutions enables it to operate more efficiently.

2.4. Listening and comparison

The Company promotes listening and constant comparison with all our stakeholders as a stimulus to solve problems, create new ideas and constantly improve.

2.5. Fairness and transparency

Company and employee behavior are characterized by fairness and transparency. The Company undertakes not to discriminate and to offer equal treatment opportunities to its stakeholders.

The principle of fairness implies that in relations with all counterparts, the Company avoids any discrimination based on age, racial and ethnic origin, nationality, political opinions, religious beliefs, sex, sexuality or status health of its interlocutors.

The principle of transparency is based on the truthfulness, accuracy and completeness of information both outside and inside the Company.

In the formulation of the contracts the company processes the clauses in a clear and understandable way, always ensuring the maintenance of the condition of equality with the contractor.

2.6. Customer satisfaction

The Company places customers at the center of its attention with the aim of satisfying its needs and expectations in terms of quality and safety of the service provided and assistance in solving problems.

2.7. Full compliance with laws and regulations

The Company has as its essential principle the full compliance with laws and regulations in force in Italy and in all the countries in which it operates and respect for the democratic order constituting it.

Each employee must therefore commit to compliance with the regulations applicable to the business. In no case is it permitted to pursue or realize the interest of the Company in violation of the laws.

This commitment must also apply to consultants, suppliers, customers and anyone who has relationships with MONTEVERDI S.r.l.

The latter will not start or continue any relationship with those who do not intend to align themselves with this principle.

Therefore, the Subjects must be aware of the laws and the normatively dutiful behaviors; if doubts arise or need further clarification, it is compulsory to consult the direct superiors in this regard.

¹ Si richiama quanta prescritto all'articolo 25-quater del D. Lgs. n. 231/ 2001.

The Company must ensure an adequate training and continuous awareness program on the issues pertaining to the Code of Ethics.

Employees and collaborators of the Company are invited to contact not only their direct superiors, but also the Sole Director of MONTEVERDI S.r.l.

2.8. Protection of health and safety in the workplace

The safety of its own workers and of the workers of suppliers and contractors who operate in the company's premises is a fundamental principle that inspires the choices and decisions of the Company and is pursued with firmness and absolute rigor.

2.9. Environmental protection

MONTEVERDI S.r.l. is committed to protecting the environment as a primary asset. To this end, it directs its choices, so as to guarantee compatibility between the pursuit of its own aims and environmental requirements. The Company consequently refuses the behavior that deviates by the aforementioned principles.

In carrying out its activity, the Company undertakes to safeguard the surrounding environment and to contribute to high sustainable development of the territory. In this context, MONTEVERDI Srl undertakes to operate in all situations in full compliance with the regulations governing the subject and to limit the environmental impact of its activities, also taking into account the development of scientific research on the subject.

2.10. Activities documentation

All activities, actions, transactions and operations of the Company must be:

- carried out in compliance with the regulations in force, of the maximum managerial correctness, of the completeness and transparency of the information and of the formal and substantial legitimacy;
- performed in compliance with the instructions and procedures and within the limits of the delegations received and the budgets approved by the Administrative Body, as well as being legitimate, consistent and congruous.

Persons who become aware of any omissions, alterations or falsifications of the accounting records, or of the related supporting documents, are required to promptly inform their superior, or the person in charge of the competent corporate function if the sole administrator, who will act in the manner described in the Code of Ethics.

2.11. Efficiency

The principle of efficiency requires that in every work activity the cost-effectiveness of the management of the resources used in providing the services is realized and a commitment is made to offer an adequate service with respect to the customer's needs and according to the most advanced standards.

2.12. Spirit of service

The principle of the spirit of service implies that each recipient of the Code is always oriented, in its behavior, to sharing the corporate mission aimed at providing a service of high social value and usefulness to the community, which must benefit from the best quality standards.

2.13. Competition

The Company intends to develop the value of competition by adopting principles of fairness, fair competition and transparency towards all the operators present on the market.

3. GOVERNMENT SYSTEM OF THE COMPANY

The governance system adopted by the Company complies with current legislation and is aimed at ensuring the maximum and most balanced collaboration between its components through a harmonious reconciliation of the various management, direction and control roles.

This system is aimed at ensuring a responsible management of the Company and is transparent towards the market, with a view to achieving an economic balance that is valid over time.

The members of the corporate bodies must inform their activities on the principles of correctness and integrity, refraining from acting in situations of conflict of interest in the activity they carry out in the Company.

The members of the bodies are also required to behave according to the principles of autonomy,

of independence and respect for the guidelines that the Company provides in the relations they hold, on its behalf, with public institutions and with any private party.

Their constant and informed participation in the Company's activity is required; they are required to make confidential use of the information they learn of for reasons of office and not they can use their position to obtain personal benefits, direct or indirect; every communication activity must comply with the laws and practices of conduct and must be aimed at safeguarding price sensitive information and trade secrets.

The members of the corporate bodies are required to comply with the regulations in force and the principles contained in this Code.

The obligations of loyalty and confidentiality bind these subjects even after the termination of the relationship with the Company.

The Company adopts, by virtue of their activities, a system of delegation of powers and functions that provides, in explicit and specific terms, the assignment of tasks to people with suitable skills and competence.

4. INTERNAL CONTROL SYSTEM

In compliance with current legislation and with a view to planning and managing corporate activities aimed at efficiency, fairness, transparency and quality, the Company adopts suitable organizational and management measures to prevent unlawful conduct or otherwise contrary to the rules of this Code by any person acting for the Company.

The Company implements organizational, management and control models that provide for suitable measures to guarantee the performance of activities in compliance with the law and the royal behavior of this Code and to discover and eliminate risk situations in a timely manner. The organizational models, in order to prevent the risk of commission of the crimes from which the liability of the company may derive pursuant to

D. Lgs. 231/2001, include:

- the identification of the activities in which crimes may be committed;
- specific protocols aimed at planning the formation and implementation of company decisions in relation to the crimes to be prevented;
- the identification of the methods of managing financial resources suitable for preventing the commission of crimes;
- information obligations towards the body in charge of supervising the functioning and observance of organizational models;
- the introduction of a disciplinary system suitable for sanctioning the failure to comply with the measures indicated in the model.

L'organo di Amministrazione verifica periodicamente l'adeguatezza e l'effettivo funzionamento del sistema di controllo interno ed esegue gli interventi ritenuti necessari od opportuni per assicurarne il miglior funzionamento.

5. APPLICATION AREAS

5.1. Relations with customers (public and private)

5.1.1. Equality and impartiality

The Company undertakes to satisfy its customers in compliance with the obligations set.

The Company also undertakes not to discriminate against its customers.

The Company establishes a relationship with customers characterized by high professionalism and marked by to availability, respect, courtesy, research and the offer of maximum collaboration.

² Previsioni contenute nell'art. 6 del D. Lgs. 231/2001.

5.1.2. Transparency

The Company undertakes to communicate promptly and in the most appropriate manner any information relating to any changes and variations in the provision of the service.

5.1.3. Quality and customer satisfaction

The Company undertakes to guarantee the achievement of the required quality and safety standards and to periodically monitor the quality of the service provided to the customer.

5.1.4. Interaction with customers

The Company is committed to encouraging interaction with customers through appropriate communication systems. The company repudiates the dispute as an instrument aimed at obtaining undue advantages and uses it on its own initiative only when its legitimate claims do not find due satisfaction in the interlocutor.

Contracts and communications with customers must be clear and simple, as well as compliant with current regulations and the indications of the Authorities.

The Company protects the privacy of its customers, according to the regulations in force on the subject, committing itself not to communicate or disseminate the related personal, economic and consumption data, without prejudice to legal obligations.

5.2. Pubbliche elations with the local authorities of reference, with the other regulatory authorities and with the other public institutions

The Company pursues the objectives indicated by the public institutions of reference and collaborates effectively with the bodies of the same.

The Company pursues these objectives by combining them with its own mission and with the need for organizational and management autonomy typical of any economic operator. It is the priority interest of the Company to comply with the commitments undertaken towards the local institutions of reference and with other regulatory authorities.

5.2.1. Public administrations

All relations between the Company and the Public Administration, as specified in the introduction of the Code of Ethics, are based on principles of correctness, transparency, collaboration, in respect of the reciprocal roles and are reserved only for the functions expressly delegated by the Administrative Body.

In order to ensure maximum clarity in institutional relations, these are maintained exclusively through contact persons who have received an explicit mandate from the corporate bodies and who are not in situations of conflict of interest with respect to the representatives of the institutions themselves.

MONTEVERDI S.r.l. rejects any behavior that may even be interpreted only as collusive in nature or otherwise liable to prejudice the aforementioned principles.

In particular it is strictly forbidden to provide or promise payments or fees, in any form, directly or through others, to induce, facilitate or remunerate a decision, the performance of an official act or contrary to official duties, of the Public administration.

Employees and collaborators of the Company, if they receive explicit or implicit requests for benefits of any kind on the part of the Public Administration or by natural or legal persons acting in the employ or on its behalf, must immediately suspend all relations and inform for registered with the appropriate Supervisory Body.

In any case, this type of expense must be authorized and adequately documented.

The provisions contained in this article must not be circumvented by resorting to different forms of aid or contributions, for example sponsorships, assignments, consultancy, advertising, rebates.

During a business negotiation, or commercial relationship with the Public Administration, actions that may offer employment and / or commercial opportunities from which to derive benefits, for themselves or for others, to employees of the PA must not be undertaken, directly or indirectly. or their relatives or similar.

In the event that the company is represented by a "third party" in relations with the P.A. the same guidelines valid for the Company apply to the consultant and his staff.

The subjects who maintain relations with the Public Administration must inform the sole director of the start of the most significant operational contacts of MONTEVERDI S.r.l. with the Public Administration itself.

5.3. Relations with staff

The "human factor" is the key resource of the Company: and only thanks to it can maximum customer satisfaction be achieved.

MONTEVERDI S.r.l. it is therefore committed to selecting and maintaining personnel with skills appropriate to the role to be filled and the duties to be performed.

5.3.1. Human resources management

MONTEVERDI S.r.l. it does not tolerate any form of irregular work and exploitation.

Any racial discrimination of sex, nationality, religion, language, trade union or politics in the assumption, remuneration, promotions or dismissal as well as any form of favoritism.

The Company rejects any action that could constitute abuse of authority and, more generally, that violates the dignity and psycho-physical integrity of the person. For the entire duration of the employment relationship, the employees and the collaborators receive indications that allow to understand the nature of the own job and that allow to carry out it adequately, in the respect of his own qualification.

The staff undertakes to comply, with diligence and loyalty, with the obligations relating to their duties.

5.3.2. Safety and health

The Company guarantees a working environment in compliance with the current safety and health regulations, through the monitoring, management and prevention of risks connected with the performance of the professional activity.

To this end, it promotes responsible and safe behavior and adopts all the security measures required by technological evolution to guarantee a safe and healthy working environment, in full compliance with current legislation on prevention and protection pursuant to Legislative Decree 81 / 2008 The general measures to protect the health and safety of workers in the workplace are:

- the assessment of all health and safety risks;
- prevention planning, aimed at a complex that coherently integrates in the prevention the technical production conditions of the Company as well as the influence of environmental factors and work organization;
- the elimination of risks and, should this not be possible, their reduction to the minimum in relation to the knowledge acquired on the basis of technical progress;
- compliance with ergonomic principles in the organization of work, in the design of workplaces, in the choice of equipment and in the definition of work and production methods, in particular in order to reduce the effects on health of monotonous and repetitive work;
- risk reduction at source;
- replacing what is dangerous with what is not, or is less dangerous;
- the limitation to the minimum of the number of workers who are, or may be, exposed to risk;
- limited use of chemical, physical and biological agents in the workplace;
- the priority of collective protection measures with respect to individual protection measures;
- health control of workers;
- the dismissal of the worker from the exposure to the risk for sanitary reasons inherent his person and the assignment, ave possible, to another job;
- adequate information and training for workers; for managers, the supervisors; for workers' safety representatives;
- appropriate instructions for workers;
- the participation and consultation of workers and their safety representatives;
- the planning of the measures deemed appropriate to ensure the improvement of safety levels over
- emergency measures to be implemented in case of first aid, fire fighting,

evacuation of workers and serious and immediate danger;

- the use of warning and safety signs;
- the regular maintenance of environments, equipment, installations, with particular regard to safety devices in compliance with the manufacturers' indications.

5.3.3. Protection of the person

The Company is committed to ensuring compliance with the conditions necessary for the existence of a collaborative and non-hostile work environment and to prevent discriminatory behavior of any kind.

The collaboration of all is required in order to maintain a climate of mutual respect for the dignity, honor and reputation of each one.

Employees who believe they have suffered discrimination may report the incident to their manager who will proceed to ascertain the actual violation of the Code of Conduct.

Those disparities which are motivated on the basis of objective criteria do not constitute discrimination.

5.3.4. Personnel selection

Without prejudice to the obligations deriving from the provisions in force, the selection of personnel is subject to verification of the full compliance of the candidates with a substantial adherence to the professional profiles required by the company, respecting equal opportunities for all subjects concerned.

5.3.5. Taking

The recruitment of personnel takes place on the basis of regular employment contracts, as no form of non-compliant or otherwise elusive employment relationship with the provisions in force is permitted.

5.3.6. Duties of staff

The staff undertakes to comply with the obligations established by this Cadiz and must comply with the law in carrying out their duties and base their conduct on the principles of integrity, correctness, loyalty and good faith.

5.3.7. Use of time and company assets

Employees and collaborators of the Company cannot carry out, during working hours, other extraneous or non-congruent activities with their own duties or organizational responsibilities. Their use, in compliance with established safety procedures, must be used for the performance of the business activity.

The employee carefully uses and maintains the assets at his disposal for work reasons.

The use of assets and resources owned by the company is not permitted.

Each employee is directly and personally responsible for the protection and legitimate use of the assets and resources entrusted to him for the performance of his duties.

The Company, in compliance with the laws in force, adopts the necessary measures to prevent misuse of the same.

5.3.7. Conflict of interest

The employee must maintain a position of autonomy and integrity in order to avoid making decisions or carrying out activities in situations, even if only apparent, of conflict of interest with respect to the Company's activity.

Any activity that conflicts with the proper fulfillment of one's duties or which could harm the Company's interests and image must be avoided.

Any situation of conflict of interest, real or potential, must be previously communicated to the Administrative Body.

5.3.8 Use of computer systems

With respect to the use of computer systems, each employee is responsible for the safety of the systems used and is subject to the regulations in force and the terms of the license agreements. Except as provided for by civil and criminal laws, the use of network connections for purposes other than those related to the employment relationship or to send offensive messages or which may damage the image is part of the improper use of company assets and resources. firm.

Each employee is also required to provide the necessary commitment in order to prevent the possible commission of crimes through the use of IT tools.

5.3.9. Gifts, gifts and other benefits

The pursuit of institutional interest can never justify conduct contrary to the principles of fairness and honesty; also for this reason any form of benefit is refused o

gift, received or offered, which can be understood as a tool to influence the independence of judgment and conduct of the parties involved.

Healthy gifts of modest value are permitted, provided they are kept within limits that do not compromise the integrity and ethical and professional correctness of the parties and, in any case, provided they can be considered usual in relation to the anniversary.

Unlawful advantages cannot be attributed to public or private customers or suppliers

In relations with the Public Administration, gifts can only be given within the limits and according to the procedures defined in the Organization, Management and Control Model pursuant to Legislative Decree 231/2001.

In the event of doubt regarding the correspondence of the gift in relation to the above, before accepting it, the employee must inform the sole administrator, who expresses his binding opinion on the matter.

5.3.10. Confidentiality and information management

The information, data, knowledge acquired, processed and managed by employees in the exercise of their activity must remain strictly confidential and appropriately protected and may not be used, communicated or disclosed, whether inside or outside the Company, if not in compliance with current legislation and company procedures.

Employees, when processing such data and information, must pay the utmost attention and confidentiality.

In particular, they must: keep the news and information learned in the exercise of their functions confidential and are not subject to transparency in accordance with the law and regulations;

- observe the duty of confidentiality even after leaving the service;
- consult only the documents to which they are authorized to access, making use of them in accordance with their duties and allowing access only to those who are entitled to them and in compliance with the prescriptions issued;
- prevent the possible dispersion of data by observing the security measures given, guarding the entrusted deeds with order and care and avoiding making unnecessary copies.

5.3.11. Obligations of collaborators

The provisions of the preceding points are extended to all possible collaborators and consultants of the Company.

5.3.12. Use of social media

The Company is aware of the fact that the use of social media has become an important factor in the exchange of information and also offers opportunities for developing the company's business. For this reason, the Company hopes to maximize the opportunities deriving from these new forms of communication, but at the same time it intends to prevent the potential risks deriving from their improper use. Social media include, for example, blogs, social networks such as Twitter, Facebook, LinkedIn,

The Company recognizes the right of its employees to engage in online activities of a personal nature, but recognizes that its employees are responsible for any economic damage

or reputational deriving from improper use of social media, both inside and outside working hours. In consideration of the fact that the interactive communication sites can be considered as channels whose contents become public domain, their use and to be considered strictly bound by the rules of the Code of Ethics in terms of confidentiality, data protection, communication rules with the stakeholders.

In general and in any case to avoid the dissemination on these channels of any information, news and data concerning the company activity, unless previously agreed and authorized by its manager. In the use of social media it is therefore necessary to use discretion and common sense and remember that it is not allowed to discuss topics concerning the company's activities, comment on news

concerning the Company, spread confidential information about the company, disseminate it, comment on it or express appreciation of information that may harm the corporate image or that could lead to violation of the duties of correctness, diligence and loyalty by the employee.

In particular it is prohibited:

1. the publication of information and news that may be directly damaging to the corporate image or indirectly detrimental to the reputation of the Company as regards the work activities of an employee;
2. the affixing of "like" on content deemed to be damaging to the corporate image or defamatory of the company or its employee;
3. the publication of offensive content towards colleagues or superiors;
4. the publication of contents concerning data and knowledge acquired within the scope of one's specific field of professional competence and role.

It is therefore necessary to always keep in mind the ethical rules, values and standards of conduct of the company that must be followed in the behavior of employees kept on social media. over to the values indicated in the preceding paragraphs and it is necessary to ensure: the protection of company information, the respect of the privacy of customers, suppliers, employees and economic partners, promotion of an open and positive work environment, the refusal of any form of discrimination. Finally, if the Personnel identifies comments on the Company (both positive and negative) and must report them to the relevant offices.

5.4. Relationship with contractual partners

The Company's contractual partners make it possible, with their collaboration, the concrete realization of the business activity. MONTEVERDI S.r.l. respects their important contribution, pledging to deal with them on equal terms and with mutual respect.

In the selection of the contractual Partners, carried out through clear, certain and non-discriminatory procedures, the Company exclusively uses criteria related to the objective competitiveness of the services and products offered and to their quality, also understood as the supplier's compliance with the ethical parameters expressed in the Code.

5.5. Participation in tenders and relationships with customers

5.5.1. Participation in competitive comparison procedures

In participating in competitive comparison procedures, MONTEVERDI S.r.l. carefully assesses the appropriateness and feasibility of the requested services, with particular regard to the regulatory, technical and economic conditions, making any anomalies known and, in any case, promptly, in no case assuming contractual commitments that could put the Company in the condition of having to resort to inadmissible savings on the quality of the service, on personnel costs or on job security.

5.5.2. Competition in commercial negotiations

In relations with the client MONTEVERDI S.r.l. ensures fairness and clarity in commercial negotiations and in the assumption of contractual obligations, as well as the faithful and diligent fulfillment of the same.

5.6. Relations with suppliers

5.6.1. Choice of supplier

The methods for choosing the supplier must comply with the current regulations and the internal procedures of the Company established for this purpose.

The choice of the supplier and the purchase of goods and services of any kind must take place in compliance with the principles of competition and on the basis of objective assessments relating to competitiveness, quality, utility and the price of the supply.

In the selection MONTEVERDI S.r.l. adopts objective and transparent criteria established by current legislation and company procedures.

In selecting the supplier, the company must also keep in mind the ability to guarantee

the implementation of adequate corporate quality systems, where required, of the availability of means and organizational structures and the capacity to meet the obligations of confidentiality.

5.6.2. Transparency

Relations with the Company's suppliers, including financial and advisory contracts, are governed by the provisions of this Code and are subject to constant and careful monitoring by the Company also in terms of the adequacy of the services or goods supplied with respect to the consideration agreed.

The Company prepares appropriate procedures to ensure maximum transparency in supplier selection and purchase of goods and services.

An accurate documentation system of the entire selection and purchase procedure is envisaged to allow reconstruction of each operation.

5.6.3. Fairness and diligence in the execution of contracts

The Company and the supplier must operate in order to build a collaborative and mutual trust relationship.

MONTEVERDI S.r.l. undertakes to inform the supplier in a correct and timely manner regarding the characteristics of the activity, the forms and payment times in compliance with the regulations in force as well as the expectations of the counterparty, given the circumstances, the negotiations and the content of the contract.

The performance of contractual services by the supplier must comply with the principles of fairness, correctness, diligence and good faith and must be in compliance with current legislation.

5.7. Press relations and external communications

MONTEVERDI S.r.l. recognizes the fundamental informative role played by the media towards the public. To this end, it undertakes to cooperate fully with all information bodies, without discrimination, in respect of reciprocal roles and corporate confidentiality requirements, in order to respond promptly, completely and transparently to their information needs.

The Company is in charge of maintaining an institutional website that is complete and effective.

Company personnel are not authorized to provide information to the media without the authorization of competent functions.

6. APPLICATION PROCEDURE

6.1. Adoption and dissemination

The Code of Ethics and any future updates are defined and approved by the Company's Administrative Body.

It is published with adequate emphasis on the site www.conceriamonteverdi.it

A paper or electronic copy is distributed to staff and collaborators in current and future service.

6.2. Information obligations

All employees are required to report promptly and confidentially to their departmental manager and / or the sole director in any news they have become aware of in carrying out their work activities, about violations of legal rules, of the Code of Conduct or other corporate provisions that may, for whatever reason, involve the Company.

The function managers must monitor the work of their employees and must inform the sole administrator of any possible violation of the aforementioned rules.

The reports, possibly also in anonymous form, may also be addressed directly to the sole administrator and may be made in writing, orally or electronically.

The sole administrator will act in such a way as to guarantee the whistleblowers against any form of retaliation, discrimination or penalization, also ensuring the confidentiality of their identity, without prejudice to any legal obligations and the protection of the rights of persons accused wrongly and / or in bad faith.

6.3. Contractual value of the Code of Ethics

Compliance with the rules of the code must be considered an essential part of the contractual obligations of the Company's employees pursuant to and for the purposes of articles 2104, 2105 and 2106 of the Civil Code.

6.4. Violations

In the event of violations of the Code of Ethics, the Company adopts - with regard to those responsible for the violations themselves, where deemed necessary for the protection of corporate interests and to the extent required by the current regulatory framework and also by the sanctioning system envisaged by the "231 model" - disciplinary measures, which can reach up to the removal from the Company of those responsible.

The Company, in the verified cases of infringement of the principles of the Cadiz Etico which also present the details of a crime, reserves the right to proceed judicially with the parties involved.

The present Code is approved by the sole director of MONTEVERDI S.r.l. on 03/06/2019. It enters into force from the day following the approval. Any update, modification or integration of it must be approved by the sole director of MONTEVERDI S.r.l., in the same manner adopted for its initial approval.