

LA PATRIE 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 LA PATRIE S.r.l. (hereinafter referred to as the Company) in which the general principles and behavioral rules identified with positive ethical value 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 own 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 top management of the company LA PATRIE S.r.l. The Code intends to base on the correctness, fairness, integrity, loyalty and professional rigor of the operations, behaviors and behavior of the Recipients, both in internal 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.

LA PATRIE 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 Directors (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 case in which unlawful acts were carried out fraudulently evading the same.

The Code of Ethics consists of:

- 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 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 of Ethics, basing his conduct on respect, cooperation and mutual cooperation.

The principle of ethical correctness implies the respect of the rights as well as of the laws in force aimed at protecting the individual personality of all the subjects who are involved in their work and professional activity.

This also requires the elimination of any discrimination and any possible conflict of interest between 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 derive an advantage for itself or third persons.

2.3. Innovation

La Società persegue la ricerca e l'innovazione tecnologica e organizzativa nella convinzione che l'adozione di tali soluzioni consenta di operare con maggiore efficienza.

2.4. Listening and comprehension

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 the 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 ¹.

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 LA PATRIE S.r.l.

The latter will not start or continue any relationship with those who do not intend to align with this principle. Therefore, the Subjects must be aware of the laws and the normatively dutiful behaviors; if doubts arise or if further clarifications are required, it is mandatory to consult the direct supervisors in this regard.

¹ Refer to the provisions of article 25-quater of Legislative Decree n. 231/2001.

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

The employees and collaborators of the Company are invited to contact, in addition to their direct superiors, also to the Supervisory Body set up for this purpose within LA PATRIE 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

LA PATRIE 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. Consequently, the Company refuses any behavior that deviates from these principles.

In carrying out its activity, the Company undertakes to safeguard the surrounding environment and to contribute to the sustainable development of the territory. In this context, LA PATRIE S.r.l. 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 maximum managerial correctness, of completeness and transparency of information and of both 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 appropriate.

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 head of the competent company department and the Company's Supervisory Body , which 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 employed in providing the services is realized and the commitment is taken 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. GOVERNANCE SYSTEM OF THE COMPANY

The governance system adopted by the Company complies with current regulations 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 context of the activity they carry out in the Company.

The members of the bodies are also required to behave in accordance with the principles of autonomy, independence and compliance with the guidelines that the Company provides in the relations they hold, on its behalf, with public institutions and with any private entity.

Their constant and informed participation in the Company's activity is required; they are required to make a confidential use of the information they learn of for office reasons and cannot use their position to obtain direct or indirect personal benefits; 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, based on the activities and organizational complexity, 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 appropriate 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 models of organization, management and control that provide for suitable measures to guarantee the performance of activities in compliance with the law and the rules of conduct of this Code and to discover and promptly eliminate risk situations.

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 Legislative Decree 231/2001, provide* for:

- the identification of 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.

The administrative body periodically verifies the adequacy and effective functioning of the internal control system and carries out the operations deemed necessary or appropriate to ensure its best functioning.

In addition, a special Supervisory Body has been set up to verify and apply the rules contained in this Code.

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 based on availability, respect, courtesy, research and the offer of maximum collaboration.

² Forecasts contained in art. 6 of Legislative Decree 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 the regulations in force 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. Relations 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 a priority interest of the Company to respect the commitments undertaken towards the local Authorities of reference and with the 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 and 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.

LA PATRIE 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 from the Public Administration or from 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 should not be undertaken, directly or indirectly, which may offer employment and / or commercial opportunities from which advantages, for themselves or others, derive from employees of the PA. 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 appropriate Supervisory Body of the start of the most significant operational contacts of LA PATRIE S.r.l. with the Public Administration itself.

5.3. Relations with staff

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

LA PATRIE 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

LA PATRIE 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 is prohibited in the recruitment, 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 the own qualification.

The personnel 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 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 the technical production conditions of the Company into the prevention as well as the influence of environmental factors and work organization;
- the elimination of risks and, where this is not possible, their reduction to a minimum in relation to the knowledge acquired based on 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 ;
- reducing risks 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 removal of the worker from exposure to risk for health reasons concerning his person and the assignment, where 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 measures deemed appropriate to ensure the improvement of safety levels over time, also through the adoption of good practices;

- 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;
- • regular maintenance of environments, equipment, systems, with particular regard to safety devices in compliance with the manufacturers' instructions.

5.3.3. Protection of the person

The Company undertakes to ensure 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 differences that can be justified 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 the verification of the full compliance of the candidates with a substantial adherence to the professional profiles requested by the company, respecting equal opportunities for all interested parties.

5.3.5. Taking

Staff recruitment takes place on the basis of regular employment contracts, as no form of non-compliant or otherwise elusive employment relationship is allowed.

5.3.6. Duties of staff

The staff undertakes to comply with the obligations set forth in this Code 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 may not 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 intended for the performance of the business activity.

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

The misuse 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 performance of one's duties must be avoided

o that could harm the interests and image of the Company.

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

5.3.8. Use of computer systems

Compared 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 for sending offensive messages or that 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 or gift, received or offered, which can be understood as an instrument aimed at influencing the independence of judgment and conduct of the parties involved is refused.

Small gifts are allowed, 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 case of doubt regarding the correspondence of the gift in relation to the above, before accepting it, the employee must inform the Supervisory Body of the incident, which expresses its 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 confidential in the exercise of their functions 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 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 assigned 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 intends to prevent the potential risks deriving from their improper use. Social media include blogs, social networks such as Twitter, Facebook, LinkedIn, Wiki, YouTube and the like.

The Company recognizes the right of its employees to engage in online activities of a personal nature, but at the same time recognizes its employees as responsible for any economic damage.

o reputation resulting 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 is 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 it is however necessary to avoid the dissemination on these channels of any information, news and data concerning the company activity, unless previously agreed and authorized by the person in charge. In the use of social media it is therefore necessary to use discretion and common sense and to remember that it is not allowed to discuss topics concerning company activities, comment on news concerning the Company, or disseminate confidential information about the company, or disseminate, comment 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 could 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 "likes" on content deemed to be damaging to the corporate image or defamatory of the company or its employee;
3. the publication of offensive content against colleagues or superiors;
4. the publication of contents concerning data and knowledge acquired in the context 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. In addition to the values indicated in the preceding paragraphs, it is necessary to ensure: protection of company information, respect for the privacy of customers, suppliers, employees and economic partners, promotion of an open and positive work environment, rejection of any form of discrimination .

Finally, if the Personnel identifies comments on the Company (both positive and negative) it is required to report them to the competent 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. LA PATRIE 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 relations with clients

5.5.1. Participation in competitive comparison procedures

In participating in competitive comparison procedures, LA PATRIE 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, LA PATRIE 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 regulations in force and with the internal procedures of the Company established for the 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 LA PATRIE S.r.l. adopts objective and transparent criteria established by current legislation and company procedures.

In selecting the supplier, the company must also take into account the ability to ensure the implementation of adequate corporate quality systems, where required, of the availability of means and organizational structures and the ability 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 rules 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 system of documentation of the entire selection and purchase procedure is envisaged such as to allow the 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.

LA PATRIE S.r.l. undertakes to inform the supplier in a correct and timely manner regarding the characteristics of the activity, the forms and the 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

LA PATRIE 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 maintains an institutional website that is complete and effective.

Company personnel are not authorized to provide information to the media without the authorization of the 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.lapatricie.it

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

6.2. Supervisory body

The Internal Control Supervisory Body is established with the task of supervising the implementation and compliance with this Code and the Organization, Management and Control Model, their effectiveness, adequacy and ability to maintain the functionality requirements over time. and soundness required by law.

The requisites, composition, powers and means of functioning of said body are referred to the specific Regulation included in the Organization, Management and Control Model pursuant to Legislative Decree 231/2001.

With reference to the Code of Ethics, the Supervisory Body is responsible for expressing binding opinions regarding the ethical issues that may arise in the context of company decisions and the alleged violations of the Code reported to it by the department managers. Furthermore, the Supervisory Body must follow the periodic review of the Code of Ethics and its implementation mechanisms also through the presentation of adjustment proposals; is in charge of setting the communication and ethical training plan.

6.3. Information obligations

All employees are required to report promptly and confidentially to their head of department and / or the Supervisory Body 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 Supervisory Body of any possible violation of the aforementioned rules.

The reports, possibly also in anonymous form, may also be addressed directly to the Supervisory Body and may be made in writing, orally
o electronically.

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

The aforementioned reports will be promptly verified by the same Supervisory Body which, in cases of ascertained violations of the Code of Ethics, will inform the Administrative Body.

Failure to comply with the information duty in question can be sanctioned pursuant to the disciplinary system established by the Organization, Management and Control Model pursuant to Legislative Decree 231/2001, upon proposal of the Supervisory Body, as also provided in the following paragraphs.

6.4. 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.

6.5. Violations

In the event of violations of the Code of Ethics, the Company adopts - with regard to those responsible for the violations, where deemed necessary for the protection of corporate interests and in accordance with the provisions of the current regulatory framework and also 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 verified cases of infringement of the principles of the Code of Ethics that also present the details of a crime, reserves the right to proceed judicially with the parties involved.

The present Code was approved by the Administrative Body of LA PATRIE S.r.l. on 11/26/2017. It enters into force from the day following the approval. Any update, modification or integration of it must be approved by the Administrative Body of LA PATRIE S.r.l., in the same manner adopted for its initial approval.