



COMPLIANCE AND CORPORATE POLICY

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1 Premise

The document contains references and guiding principles, complementary to legal and self-regulatory obligations, which guide pipelines in continuity and coherence with the Co.Ideas mission and its core values.

The document and its possible updates are defined and approved by the Unique Administrator, who transmits them to all recipients for its proper application.

2 Area of application and people for whom it is intended

The principles and provisions are binding on Directors, any mayors, employees, job providers, consultants and employees in any capacity, agents, prosecutors and any other person who may act on behalf of Co.Ideas (of followed cumulatively by the "Recipients").

Recipients of this document are required to know the contents and to respect their precepts.

Given the variety of Co.Ideas' activities, any behaviour, although not expressly considered, must be based on criteria of legality, transparency, common sense and personal ethics, in line with company values and procedures and company's awareness of regulatory and reputational risks.

The contained principles complement the rules of conduct that Recipients are required to comply with, under current regulations, employment contracts, internal procedures and codes of conduct.

This document overrides any provision contained in internal regulations or procedures that conflict with the provisions prescribed in the document.

3 Principles and values

Co.Ideas, in pursuing its mission adopts principles of impartiality, fairness and transparency.

The lines of conduct, made by all those who participate in the business activities, are aimed at implementing the following principles of reference.

3.1 Ethics and Values

Co.Ideas aims to achieve its entrepreneurial goals, which also contributes to the creation and maximization of value.

In conducting business, Co.Ideas operates in accordance with current law and standardizes its business to the principles of impartiality, fairness, transparency and compliance with the ethical rules contained in this document, a key component of the model organisation and the overall system of internal controls.

Co.Ideas promotes the creation of an environment characterized by a strong sense of ethical integrity, in the belief that this element is decisive for an effective internal control system and positively influences the achievement of the company's success.

3.2 Goals and values

In pursuing its economic goals, Co.Ideas believes in the need to achieve excellence in performance in terms of the quality and convenience of the products and services offered, solely in accordance with the principles of fairness and ethics Professional.

For this purpose, cost-effectiveness criteria are defined, through the optimization of production processes, in order to provide solutions and services that can ensure maximum process efficiency and maximize value for money, thus achieving full customer satisfaction.

Resources are used responsibly for sustainable development, respecting the environment and the rights of future generations.

Co.Ideas supports a competition that is loyal to its interest, that of market competitors, customers and stakeholders in general.

Co.Ideas protects and enhances the human resources it uses by ensuring defined career paths and ensuring the professional growth of its staff even with participation in specialized training courses.

3.3 Respect for applicable laws and regulations

Respect for existing laws and regulations is a fundamental commitment of the relationship between the company, the social bodies, their members and every Co.Ideas employee.

This commitment is extended to consultants, suppliers, customers, and anyone who has or intends to have relationships with Co.Ideas. Business relations with those who do not align with this principle will not be undertaken or broken.

Co.Ideas denies the use of unlawful or otherwise improper conduct (to the community, public authorities, customers, workers, investors, suppliers and competitors).

It promotes the adoption of all organizational tools to prevent the violation of legal provisions and the principles of transparency, fairness and loyalty by its employees.

Co.Ideas ensures an adequate training and ongoing awareness program on ethical behavior issues.

3.4 Fairness, transparency and impartiality

In dealings with third parties, such as members, employees, customers and suppliers, Co.Ideas adopts behaviors of utmost fairness and transparency.

Co.Ideas scrupulously adheres to objective criteria of evaluation and does not allow any discrimination based on age, health status, sex, religion, race, political and cultural views and trade union associations for work.

It is prohibited for all Recipients to receive, pay and/or promise, directly or indirectly, money, benefits and/or usefulness of any kind to third parties, representatives of governments, public officials or individuals, including senior players (such as directors, directors responsible for drafting corporate accounting documents, mayors, liquidators) of *corporate* counterparts and/or those connected to them, to influence improper and/or unduly related to them, to influence improper and/or unduly unlawful mediation. In any case, Co.Ideas must operate in accordance with each other's roles: acts of commercial courtesy, such as representation fees or gifts, are allowed only if of modest value or such as not to compromise the integrity or reputation of the parties and that they cannot be interpreted as intended to acquire improper benefits.

Co.Ideas condemns any form of corruption without exception, active and passive, even if carried out against private entities.

Any form of favoritism aimed at:

- induce a Public Officer to improperly perform any public function in a manner that does not conform or contrary to his office duties,
- improperly and/or unduly influence the actions of a private counterpart,
- influence an official act (or omission) by a Public Officer or any decision in violation of an office duty;
- in any case, violate applicable laws in particular for the benefit or interest of the Company.

This prohibition is not limited to the donation and/or promise of money but includes, for purely simplistic purposes, for corrupt purposes:

- promise and/or offer of non-modest giveaways,
- or offering in-kind contributions, such as sponsorships,
- promise and/or job supply,
- disclosure of confidential information about financial instruments that can influence the market, other benefits or other utilities.

3.5 Confidentiality

Co.Ideas keeps confidential data and information, including personal and business data, which is being treated in the running of the activity carried out on behalf of customers, ensuring full and timely compliance with security and protection measures.

3.6 Professional Contribution of Human Resources

Co.Ideas promotes the continuous increase of the technical and professional skills of human resources with the aim of protecting and increasing its value.

3.7 Environment and working conditions

Co.Ideas promotes the creation of safe and healthy working environments and working conditions respectful of individual dignity as elements to promote the physical and moral integrity of employees and employees. Co.Ideas also promotes the creation of a working environment in which personal characteristics and guidelines cannot result in discrimination and can promote the serenity of all employees and/or employees.

3.8 Innovation and technological excellence

Co.Ideas ensures quality, security, confidentiality, reliability and continuity of services through the constant alignment of the computer architecture to technological evolution.

Identify the best opportunities offered by the national and international market to realize, including through innovative partnerships, solutions and services.

4 Principles of business management

4.1 Administration and budget

The drafting of the budget and any other type of accounting documentation must be carried out in accordance with current industry laws and regulations, considering the most advanced accounting practices and principles.

Accounting and the balance sheet must faithfully represent the facts of management (economic, capital and financial) according to criteria of temporal competence, clarity, veracity and fairness.

The criteria applied in the evaluation of budget items and impairments comply with the provisions of the Civil Code and the guidelines contained in the accounting principles issued by the Italian Accounting Board.

The Budget is drawn up in accordance with Articles 2423 and following of the Civil Code and the national accounting principles published by the Italian Accounting Board; It therefore clearly and truthfully and corrects the company's financial and financial position and the financial result of the year.

The contents of the Balance Sheet and the Income Statement are that provided by Articles 2424 and 2425 of the Civil Code.

The supplementary note, drafted under art. 2427 of the Civil Code, also contains all the information useful to provide a correct interpretation of the Budget.

Individual management facts and transactions, including for the purpose of identifying the reasons for the transaction and the different levels of liability, must be reconstructable and faithfully represented in the administrative/accounting systems.

Each recording must reflect exactly what results from the supporting documentation; For this purpose, all documentation must be properly archived and ordered according to logical criteria.

It is forbidden to engage in conduct that may prejudice the transparency and traceability of the budget information.

4.2 Internal controls

An efficient and effective internal control system is a necessary condition to ensure compliance with laws, internal procedures, protection of corporate assets, efficient management and administration ready to provide accounting data and true and complete financial statements.

All recipients of the document are therefore called upon to ensure that the internal control system works better.

Any auditing and auditing bodies, the Audit Service and the auditing companies in charge have free access to the data, documentation and information useful for carrying out the relevant activities.

5 Member Relationships

In pursuing its value creation goal, Co.Ideas works by providing the member with appropriate, timely and comprehensive information on the key aspects of business management, inspiring their conduct, as well as the principles and values already maximum transparency criteria.

Co.Ideas is also committed to considering the indications expressed by members in the parliamentary venues.

Any act, simulated or fraudulent, aimed at influencing the will of the members of the Members' Assembly, in order to obtain the irregular formation of a majority and/or a different deliberation from the one that would otherwise have been produced.

5.1 Inside Information

Co.Ideas ensures the correct management and protection of inside information, safeguarding its accuracy, completeness and mode of preservation, in accordance with the regulations and procedures of reference.

6 Relations with employees and collaborators

6.1 Human Resources Selection and Management

In research and recruitment, Co.Ideas adopts criteria of objectivity, competence and professionalism, applying the principle of equal opportunity, without favouritism, with the aim of securing the best skills existing in the labour market. In employment it respects the age of 18 and the other legal provisions on the subject also in relation to the training of workers.

The management and development of human resources is a strategic factor for Co.Ideas.

For this reason, business plans and appropriate training programmes are promoted to promote the explanatory of each person's skills and skills.

All their employees are offered equal opportunities and professional developments, based on merit criteria.

Co.Ideas puts in place any action to prevent any form of harassment -psychological, physical and sexual -against employees.

6.2 Work, Safety and Health

The employment relationship is formalized in writing and all mandatory recruitment notices are carried out as well as termination of the relationship.

Coideas complies with Italian regulations and applicable CCNL (wood industry) with reference to the working environment, working hours and working conditions.

The creation and management of appropriate environments and workplaces from the point of view of employee safety and health, in accordance with national and international guidelines on the subject, is a particularly important factor for Co.Ideas.

6.3 *Politica sulla salute e sicurezza dei lavoratori*

It is Co.Ideas' policy to commit to building and maintaining a safe, healthy and productive work environment for all its employees.

The company acknowledges that the misuse of alcohol, drugs and other similar substances by employees negatively affects their work and can have harmful consequences on the safety, efficiency and productivity of the entire company.

For this purpose, staff who believe they are addicted to these substances or who use them excessively should seek medical advice and follow inappropriate treatment are invited to do so. In this sense it is available to those concerned that on a purely voluntary and strictly confidential basis, the doctor responsible for any information and also an active collaboration for the purpose of a more effective recovery, ensuring all the guarantees current legislation and in absolute respect for the dignity of the person.

The company reserves the right to carry out unannounced checks on the existence of drugs and alcohol on its premises and to take appropriate precautionary measures. Co.Ideas undertakes its activities in a way that safeguards the safety of its employees, third parties involved in its operations, customers and the public.

The company will continue to make every effort to prevent all accidents, accidents and occupational diseases, through the active participation of each employee.

The company is committed to making continuous efforts to identify and eliminate or control the risk situations associated with its activities of a logic of continuous improvement.

The company therefore proposes for its policy to:

- protect the health and safety of workers, even with adequate health control; -to deal quickly, effectively and diligently with emergencies or incidents that could occur during its operations;
- comply with all applicable laws and regulations and where the situation is not regulated to comply with standards identified with a sense of responsibility;
- To raise awareness of its employees and stakeholders working for the company, about their role and responsibility in the field of safety;
- invest in eliminating dangers at source, replacing what is dangerous with what is not or is less so;
- ensure the effectiveness of any responses to internal or external emergency situations;
- to raise awareness of their employees to encourage responsible behavior in them.

6.4 *Protecting personal data*

In accordance with the current privacy regulations (D.Lgs. 196/2003) Co.Ideas complies with the requirements and informs each employee about the nature of the personal data being processed, the methods of treatment, the areas of communication by taking the appropriate measures to ensure confidentiality. Co.Ideas also defines the value of the data that each external employee/collaborator is entitled to process. The person provides for the preparation and delivery of special letters of appointment to the person in charge of the data processing.

6.5 Diligence and good faith

Every employee and/or collaborator must know and observe the contents of this Document.

It must focus its conduct on respect, cooperation and mutual collaboration, acting fairly and in good faith, respecting contractual obligations and ensuring the required performance.

Employees of Co.Ideas, regardless of their role and/or level of responsibility, must be aware of and comply with company regulations and procedures, in particular those relating to environmental protection, security and privacy protection.

As far as employees are concerned, Co.Ideas will make this document available to them, so that they may subscribe to a special declaration of knowledge and pledge not to engage in any conduct in breach of the principles in it. Content.

6.6 Conflict of interest

Each employee and/or employee has a duty to work in the exclusive interest of Co.Ideas, avoiding any situation of conflict that may cause injury or lead to situations of wrongdoing, including through family members.

Co.Ideas expects employees to avoid even the mere appearance of conflict of interest.

Before accepting a consultancy, management, administration or other position in favour of another person, or if there is a conflict situation mentioned above, each employee is required to notify the company of the following Membership.

6.7 Confidentiality of information

Employees and employees are required to observe the utmost confidentiality on information, documents, studies, initiatives, projects, contracts, plans, etc., known for their performance, with particular reference to those that may compromise image or interests of customers and the company.

Co.Ideas puts in place physical and logical measures to preserve the integrity of managed information and prevent it from being accessible to unauthorized personnel.

All information, in particular information learned in the context of customer activities, must be considered confidential and cannot be disclosed to third parties, nor used for personal, direct and indirect benefits.

6.8 Protecting Company Assets

Each employee/collaborator is required to scrupulously adopt the company's security policies in order not to compromise the functionality and protection of the IT systems in use at Co.Ideas.

Employees and/or employees must also ensure that the company's safety standards are respected for the activities carried out by employees or third-party companies operating on behalf of the Company.

Employees and/or employees are committed to complying with laws relating to patents, copyrights, trademarks, trade secrets, etc. that protect the intellectual property rights of companies and individuals. Copyrighted and employee-used software for the Company's activities may not be reproduced, except for copies made for the back-up function, nor can they be reproduced for the employee's personal use.

Unauthorized software and databases on Co.Ideas computers are prohibited.

Employees/collaborators are not allowed to use company e-mail tools to send messages for non-work purposes and in any case that are detrimental to the company's image or that of third parties; It is also not allowed to browse websites with illicit content or otherwise unrelated to work.

Employees and/or employees are responsible for assigned company assets and must act diligently to protect company assets from improper or incorrect uses.

6.9 Gifts and Benefits

It is not permissible to accept/propose gifts, benefits (both direct and indirect), gifts, acts of courtesy and hospitality, such as to compromise the image of the Company and to be interpreted as being intended to obtain a favourable treatment that is not legitimate and/or determined by the rules of the market (see 3.4 Fairness, transparency and impartiality).

7 Customers relationship

In dealing with its customers, Co.Ideas ensures the best execution of the tasks entrusted by directing its choices towards increasingly advanced and innovative solutions, with a view to integration, effectiveness, efficiency and cost-effectiveness.

Full satisfaction with the needs of its contractual counterparts is co.Ideas' priority, also in order to create a strong relationship inspired by the general values of fairness, honesty, efficiency and professionalism.

Contracts with customers must comply with the legal requirements and are based on criteria of simplicity, clarity and completeness, avoiding the use of any deceptive and/or improper practice carried out.

In establishing business relationships with new customers and in the management of those already in place, it is necessary, taking into account the available information, to avoid liaising with persons involved in illicit activities, in particular related to the "It's not just a case of money, money laundering and terrorism, and with people who don't have the necessary requirements for seriousness and commercial reliability," he said.

7.1 Confidentiality of information

Co.Ideas is committed to maintaining total confidentiality of confidential information regarding its customers, both in reference to strategic information from the customer company and to personal data. It also ensures the use of such information only for strictly professional reasons and in any case later than the consent issued by the customer, if necessary. Customers are also required to ensure confidentiality in relation to information, documents, personal data, relating to the company and its staff.

7.2 Business deals and tenders

The persons in charge of Co.Ideas to follow any business or tender negotiations should not engage in any behavior of any kind to prevent or disrupt the regular conduct of negotiations or a tender in accordance with procedures expected to be

7.3 Negotiating fairness

Co.Ideas sets contracts with its customers in a fair, comprehensive and transparent manner, trying to predict circumstances that could significantly affect the relationship established.

Even where unexpected events or situations occur, Co.Ideas respects the customer's expectations by executing contracts fairly, without exploiting any conditions of weakness or ignorance at the onset of unforeseen events.

Co.Ideas is committed to ensuring the quality and reliability of the services and products offered, while monitoring that the services and products provided and supplied are fully compliant with applicable regulations.

7.4 Gifts and Benefits

It is forbidden to offer/receive, directly or indirectly, to/from customers gifts and/or benefits (money, objects, services, services, favors or other utilities) that can be interpreted as being intended to obtain favourable treatment that is not legitimate and/or determined by market rules (see 3.4 Fairness, transparency and impartiality).

8 Relationships with suppliers and employees

8.1 Supplier Choice

In choosing suppliers to entrust the implementation of works, supplies and services, Co.Ideas adopts the maximum transparency and efficiency of the purchasing process; ensures impartiality at every stage of the proceedings; maintains the confidentiality of information that is not susceptible to disclosure; promptly report any possible or potential conflicts of interest.

In choosing the contractor, Co.Ideas guarantees all potential suppliers equal conditions in participation in the selection. The selection process is based on objective assessments, according to principles of fairness, economics, quality, innovation, continuity and ethics.

Participating suppliers must require insurance in terms of the means, including financial means, organizational structures, capacity, know-how, quality and resource systems, adapted to meet their needs and those of those of the customers.

To ensure integrity and independence in dealings with suppliers, Co.Ideas has set up internal legislation to regulate the purchasing process, which staff must strictly adhere to.

This legislation includes:

- the separation of roles - where in practice practicable - between the unit requiring the supply and the one that enters into the relevant contract;
- the adoption of formalities suitable to adequately document the choices taken (e.g. "tracking the stages of the purchasing process");
- The retention of official tender information and documents or supplier selection, as well as contractual documents, for periods established by applicable regulations and recalled in internal purchasing procedures. The competent functions and more generally recipients are not allowed:
- induce suppliers to enter into an unfavourable contract with the prospect of subsequent benefits;
- receive freebies or other forms of benefit, not directly attributable to normal courtesy relationships.

8.2 Execution of the contract

The company functions and employees of Co.Ideas are required to scrupulously observe internal procedures relating to the management of relationships with suppliers and to observe and enforce, in the supply reports, applicable legal provisions and contractual conditions.

This document is available to suppliers if they wish to take note.

8.3 Professional collaborator choice

In choosing the professional to be appointed, Co.Ideas is committed to adopting criteria inspired by principles of competence, economics, transparency and fairness, the moral and professional integrity of the person to be involved.

Compensation and/or sums for any security paid will have to be adequately documented and proportionate to the activity carried out, also in view of market conditions; payments may not in any way be made to a person other than the contractual counterpart.

8.4 Confidentiality of information

Co.Ideas is committed to maintaining total confidentiality over information about its suppliers and to use that information only for strictly professional reasons and in any case following specific consent, if necessary. Suppliers are also required to ensure confidentiality in relation to information, documents and personal data relating to the company and its employees.

8.5 Gifts and Benefits

It is forbidden to propose/receive gifts, benefits (both direct and indirect), acts of courtesy and hospitality in relations with, suppliers and collaborators, such as to compromise the image of Co.Ideas and can be interpreted as aimed at obtaining a favorable treatment that is not determined by the rules of market (see 3.4 Fairness, transparency and impartiality).

8.6 Business deals and tenders

Persons in charge of any business or tender negotiation must not engage in any kind of conduct designed to prevent or disrupt the regular conduct of negotiations or a tender in accordance with the procedures provided.

8.7 Preventing money laundering

Co.Ideas carries out its activities in full compliance with anti-money laundering regulations and the provisions issued by the relevant authorities, to this end by pledging to refuse to carry out suspicious transactions in terms of fairness and Transparency.

Co.Ideas is therefore required to: pre-emptively verify the information available on commercial counterparts, suppliers, partners and consultants, in order to ascertain their respectability and the legitimacy of their business before establishing with them business relations; operate in a way that avoids any involvement in operations that facilitate money laundering from illicit or criminal activities, acting in full compliance with anti-money laundering legislation and internal control procedures.

9 Public Administration relationship

The relationship between Co.Ideas and the Public Administration, public officials or public service persons must be inspired by the strictest compliance with applicable legal and regulatory provisions and cannot in any way compromise integrity or reputation of Co.Ideas.

Only the corporate functions responsible for this are allowed to make commitments and to manage relationships, of any nature, with the Public Administration, public officials or those in charge of a public service.

The recipients of this document must refrain from offering, even for interposed persons, money or other usefulness (which may also consist of job or commercial opportunities) to the civil servant involved, his family or persons in any connected to the same way; from illegally seeking or establishing personal relationships of favour, influence, interference suitable to condition, directly or indirectly, the outcome of the relationship.

The same guidelines apply to the consultant and the "third" person who may represent Co.Ideas in the reports to the Public Administration.

Co.Ideas should not be represented, in dealings with the Public Administration, by a consultant or a "third party" entity when conflicts of interest can be created.

Any violation (actual or potential) committed by the Recipients should be reported to the relevant internal functions in a timely manner.

9.1 Gifts and Benefits

Co.Ideas prohibits any conduct, by anyone on its behalf, consisting of promising or offering, directly or indirectly, money or other usefulness to representatives of the Public Administration, Italian or foreign, or to their relatives or interest or advantage for Co.Ideas, also potential.

These acts of corruption are considered to be whether they are held by company representatives or employees, or carried out through persons acting on behalf of Co.Ideas, such as consultants, employees, agents, prosecutors and third parties. related to the company by similar relationships

equivalent (see 3.4 Fairness, transparency and impartiality).

10 Public funding and disbursements

In relations with the Public Administration Co.Ideas can not benefit except on the basis of contractual relations, measures obtained land, that is, through the disbursement of provisions of any kind properly achieved and intended for purposes for which they are granted.

It is forbidden to unfairly obtain contributions, financing, subsidized loans or other disbursements of the same type in any way named, granted or disbursed through the use or presentation of documents false or mendacious, or the omission of due information.

It is not permitted to use contributions, grants or financing intended for society for purposes other than those for which they have been granted. The company is also not allowed to withhold or unduly delay the spillover to third parties who benefit from contributions, grants, or public funding granted.

It is not permitted to take any kind of profit for third parties or Co.Ideas (licences, authorisations, pension relief, tax breaks or non-payment of social security contributions, etc.) to the detriment of the administration, with artifice or deception (for example: sending false documents or attesting to untrue things).

Recipients do not have to make or promise donations to or in the interest of Co.Ideas.

11 Relationships with the Judicial Authority, law enforcement and the authorities with inspection and control powers

The Recipients of this document must closely observe the existing legislation and the provisions issued in the areas related to their respective areas of activity.

Co.Ideas requires the utmost availability and cooperation with representatives of the Judicial Authority, law enforcement, the Public Officer who has inspection powers on behalf of the INPS, the Ministry of Labour and Social Policies and any other Public Administration.

The recipients of this document are required to comply promptly with any request from the relevant institutions or authorities.

It is forbidden to destroy, alter records, minutes, accounting records and any type of document (paper or electronic) or make false statements to the relevant authorities in anticipation of judicial proceedings, an investigation or an inspection.

All employees and/or employees have an obligation to report a request to make or produce statements before the Judicial Authority that can be used in criminal proceedings relating to the exercise of their duties; Co.Ideas prohibits or encourages employees and/or employees not to make/produce these statements, or to make them mendacious.

11.1 Gifts and Benefits

It is not permissible to try to persuade, by giving professional assignments, gifts or promises of gifts, money or other advantages (directly or by person) who carry out investigations or inspections or the competent judicial authority (see 3.4 Fairness, transparency and impartiality).

12 Relationships with political organizations and trade union

Co.Ideas does not make direct or indirect contributions, in any form, to parties, movements, committees and political and trade union organizations, to their representatives and candidates, except those provided by specific regulations.

It is forbidden to engage in behaviour of any kind with the aim of preventing, hindering or conditioning the free exercise of the right to vote in elections.

13 Media Relations

The criteria for conduct in relations with the media are based on principles of transparency, fairness and timeliness.

Information related to Co.Ideas and directed to the media can only be disclosed by the function responsible for corporate communication, or with the authorization of the High Directorate.

Communication outside of data or information should be truthful, timely, transparent and consistent with Co.Ideas policies; Therefore, recipients must refrain from conduct or statements that may in any way harm the company's image.

14 Relationships with Competitors

Co.Ideas is committed to competing in accordance with antitrust laws and in accordance with applicable laws and civil code (article 2595 and s.s.) by refraining from abusive conduct of dominant position or compromising free competition or acts of unfair competition. If Co.Ideas and/or its employees violate antitrust regulations, there are severe civil and criminal penalties.

It is prohibited to use names or distinctive signs suitable to confuse with names or distinctive signs legitimately used by others, or the servile imitation of a competitor's products, or fulfillment by any other means of acts suitable to create confusion with products and with the activity of a competitor.

It is also prohibited to spread news and appreciation about the products and activity of a competitor, which are likely to lead to discredit, or to appropriate the merits of a competitor's products or company.

It is forbidden to use, directly or indirectly, any other means that does not conform to the principles of professional correctness and is suitable to harm the other company.

It is forbidden to counterfeit or alter, in any form, trademarks or distinctive marks, domestic or foreign, of industrial products, i.e. patents, designs or domestic or foreign industrial models, as well as the prohibition of the use or import of such marks, trademarks, patents, counterfeit or altered industrial designs.

15 Disciplinary system and sanctioning mechanisms

Disciplinary sanctions will be imposed under the existing C.C.N.L., the Civil Code and the Workers' Statute (L. 300/1970).

They must be deterrence and commensurate with the seriousness of the violation, recidivism, lack or degree of guilt in accordance with the discipline referred to in art. 7 of the Act 20 May 1970, 300 and the provisions contained in the employment contracts.

The application of the disciplinary system is independent of the conduct and outcome of the criminal proceedings, which may have been initiated by the competent judicial authority.

The provisions of this document also apply to temporary providers (and more generally to those who engage with the Company in "para subordination" relationships) who will be required to comply with the precepts.

Violations of the document are sanctioned by disciplinary action taken against them by the respective employment administration companies, which are required to do so on the basis of specific contractual commitment with Co.Ideas.

With regard to suppliers, employees and external consultants, the violation of the precepts of this document is sanctioned by the termination of existing contracts with them, while remaining the power of Co.Ideas to claim compensation for damage as a result of these behaviours.

16 Environment policy

Co.Ideas has designed and implemented at all levels of the company a management system designed to protect the environment, health and safety of workers, doing everything possible to carry out their activities in a safe and environmentally friendly manner, keeping the complexity and interdependencies of our ecosystem. This policy is reviewed periodically in relation to the environmental impact of events that occurred as part of its activities.

To constantly improve what is defined, the company is committed to:

- prevent pollution by producing, stocking and starting to properly dispose of all waste from work carried out on the company;
- observe every public regulation and environmental and safety regulations applicable to its products, processes and waste;
- set goals and goals on this issue, and periodically assess the achievement of them and the effectiveness of the system in a logic of continuous improvement;
- to raise awareness of the importance of environmental protection, including the basic principles as part of fulfilling the duties of each of them;

- create a type of open communication by fostering dialogue with stakeholders, including its employees and the community, including through the dissemination of this document;
- adequate human, economic and technological resources to ensure that these objectives are met.

17 Quality Policy

As part of the programme that management has initiated to establish, maintain and improve an Integrated Management System, Co.Ideas' main objective is to provide products that meet the needs of customers in terms of quality of the product and service in accordance with applicable cogent requirements.

The cornerstones on which quality policy is based can be summarized in:

- an organizational attitude aimed at the customer: from identifying needs to solving problems;
- updating of technological know-how;
- continuous care of the business climate, through an appropriate staff policy
- a constant recovery of internal effectiveness and efficiency;
- continuous use of market return information for a steady process of improvement;
- compliance with workplace safety and environmental protection regulations.

In such a way that it can be achieved at all levels of the business:

- implementation and product improvement;
- the system management of what each "produces", keeping an eye on the operational processes, preventing problems and eliminating deficiencies.

18 Monitoring and updating the document

This document must be reviewed annually in order to ensure that it is updated.

Galliate, 07/09/2019

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