
Code of Ethics (Maggioli Consortium)

DOCUMENT CLASSIFICATION

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VERIFICATION AND APPROVAL PROCESS

Verified by	Maggioli Spa Legal Office
Approved by	Managing Director Maggioli Spa
Approved by	Board of Directors Maggioli Consortium

Maggioli Consortium

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1. Message from the President

Dear Stakeholders,

the history of the Maggioli Group began over a century ago. Since then there have been many changes in the company, in our business, in the market and in society. Change has enabled us to evolve, grow and improve, helping to create and distribute value in the territories where we operate directly and indirectly through customers, partners, suppliers and all the Group's people.

The trust that our customers renew in us, whether in the Public Administration or in the Enterprise and SME sector, confirms our direction. The commitment and sense of belonging that all employees transmit on a daily basis reassures us and spurs us to constantly improve, both in Italy and abroad. The arrival of new companies strengthens us and directs us towards exciting challenges, seizing opportunities that each specific aspect can bring to the Group.

Following this evolution, we created the Maggioli Consortium. Its main purpose is to represent the complementarity of services rendered by the single consortium members, transferring a mutually shared sense of unity, in order to contribute to the digital transformation process: promoting software solutions and ICT services, skills and knowledge in the field of Digital Publishing and investing in strategic areas for a secure, innovative, valuable environment. Underlying the responsible actions of the Consortium and its Companies are the sharing and commitment to principles of justice, integrity and ethics.

Founded on the values and principles shared in the Maggioli Consortium, the Code of Ethics represents a guideline to having clear ethical and behavioural principles guiding our work and actions, enabling each of us to make correct decisions when carrying out our activities. The document cannot exhaustively foresee all eventualities occurring, but helps us to be more aware, reflective and inclusive.

In fact, all the Consortium stakeholders, internal and external, contribute to the improvement and maintenance of qualitatively high, correct relations, environments, systems and standards, from which the Maggioli Consortium's own reputation also derives. Commitment and responsibility that involves each of us.

Certain of the importance you will attach to reading the Code of Ethics, in order to improve your understanding of its scope, principles, responsibilities and apply it in your daily work, we suggest you make it your own and point out any doubts or situations that you deem correct, always in good faith and with a constructive outlook. We renew our enthusiasm for professionalism and dedication. Everyone's contribution is indispensable and fundamental to spread the Code of Ethics, so that it is known and respected.

Amalia Maggioli
President Maggioli Consortium

Maggioli Consortium

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2. Application standards

Foreword and background

The Maggioli Consortium groups the parent company Maggioli SpA and the companies directly or indirectly controlled by it under common governance. The term “Consortium” refers, in this Code of Ethics, to the legal entity of the Consortium and to all Companies (or Consortium members) that belong to it.

The list of Consortium companies can be found at: <https://www.maggioli.com/it-it/chi-siamo/consorzio-maggioli>

The Board of Directors of the Maggioli Consortium has adopted this Code of Ethics, containing the ethical and behavioural principles inspiring the activities of the Maggioli Consortium. The Code of Ethics is binding for those who hold positions of representation, administration or management; who exercise, even de facto, the management and control of Consortium companies, or who cooperate and collaborate with them, in any capacity, in pursuing the business objectives, all employees without exception, collaborators (including, merely as an example, consultants, agents, representatives, intermediaries, etc.) and anyone who has business relations with the Maggioli Consortium (hereinafter the “Recipients”).

The Recipients must be familiar with the provisions of this Code of Ethics and are called on to actively contribute to it being observed.

Directors of the companies belonging to the Maggioli Consortium are required to adopt the Maggioli Code of Ethics. Moreover, the heads of corporate functions, in concretely implementing the management activities of Consortium companies, shall be inspired by the same principles, both internally, thus strengthening cohesion and the spirit of mutual cooperation, and towards third parties with whom the single companies have relations.

To this end, this Code of Ethics will also be brought to the attention of collaborators, business partners in business relations, associations or temporary groupings of companies; and of anyone having business relations with companies of the Consortium Maggioli Consortium business relations. The Maggioli Consortium is committed to ensuring the widest possible dissemination of this Code of Ethics, also through use of appropriate cognitive tools (e.g. online publication), training and awareness of its contents.

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Reports

All Recipients, if they become aware of alleged breaches of this Code of Ethics or of conduct that does not comply with the rules of conduct adopted by the Consortium, must promptly report it through the e-mail address ethicsconsorzio@maggioli.it or by letter in a sealed envelope addressed to the "Person in charge of the Code of Ethics" at the address of the Consortium Company 's registered office. The Head of the Code of Ethics will check the validity of the alleged breaches, hearing, where appropriate, the person who made the report and/or the alleged perpetrator.

The Head of the Code of Ethics acts so as to protect whistle-blowers against any form of retaliation, discrimination or penalisation, without prejudice to legal obligations and the protection of the Consortium rights, of the Companies and third parties, and to ensure the confidentiality of the whistle-blower and of the facts being reported.

Reports may also be submitted through the whistleblowing channels, when they exist, established in accordance with current legal provisions.

In unfounded reports made with malicious intent, the sanctions set out in the disciplinary system adopted may be applied to the person responsible.

Applicable penalties

Compliance with the provisions of this Code of Ethics is to be considered an essential part of contractual obligations of employees pursuant to and for the purposes of Art. 2104 Italian Civil Code. Any breach of the provisions of the Code of Ethics may constitute a breach of the obligations of the employment relationship and/or a disciplinary offence, in compliance with the procedures envisaged in Art. 7 of the Workers' Statute and the applicable collective bargaining agreement, with all legal consequences, including preservation of the employment relationship, and may entail payment of damages arising therefrom.

Compliance with the principles of this Code of Ethics is part of the contractual obligations undertaken by collaborators, consultants and other subjects in business relations with the Maggioli Consortium companies. Consequently, any breach of provisions contained therein may constitute a breach of contractual obligations undertaken, with all legal consequences, concerning the termination of the contract or assignment conferred, and compensation for damages.

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3. Our ethical principles

Legality

The Maggioli Consortium regards compliance with national and international regulations as a binding, indispensable condition of its actions. It is therefore committed, also by carefully preventing commission of offences, to compliance with the laws and regulations in force in all countries where the Consortium operates and to observance of the strictest rules of conduct, particularly in relations with the Public Administration.

The conduct of Recipients, in the activities performed in the interest of the Maggioli Consortium, is inspired by honesty and legitimacy, in compliance with laws in force.

Equality and impartiality

When managing the various social activities and in all related decisions (including, merely as an example, the choice of customers, personnel management and work organisation, the selection and management of suppliers, relations with the community and the Institutions representing it, etc.), Recipients must operate impartially in the best interests of the Consortium, making decisions with professional rigour and impartiality, based on objective and neutral assessment criteria.

Transparency and reliability

When do their jobs or professional activities, the actions, operations, negotiations and, more generally, the conduct of Recipients shall be inspired by the utmost transparency and reliability.

When managing social activities, Recipients are required to provide transparent, truthful, complete and accurate information. The Consortium and Consortium members promote and disseminate, at every level of the company, the control culture, making their employees aware of the importance of the internal control system and of compliance, in the performance of their jobs, with current regulations and company procedures.

Consortium companies, through their company contact persons appointed, cooperate with the auditors in the performance of the relevant tasks.

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Respect for the intellectual property of third parties

The Recipients of this Code of Ethics are obliged to protect the intangible assets of the Consortium and Consortium members and must also respect and enhance the intellectual property of the Consortium, Consortium members or third parties.

They must undertake, for example, not to make unauthorised use of patents and copyrights and to refrain from copying or plagiarising trademarks, studies, designs or publications of others.

Protection of corporate assets

The assets of Maggioli Consortium companies are to be used solely for professional purposes, in compliance with the conditions and with legitimate authorisation.

Each employee shall ensure, under means at his or her disposal, the protection and enhancement of these assets, shall avoid harming them and shall ensure that they are not used fraudulently. This rule applies to tangible assets (property, premises, equipment, supplies, etc.) as well as intangible ones (patents, information, software, trademarks, etc.).

An employee who notices gaps in the protective measures must notify his or her direct supervisor and do the same if he or she notices theft or attempted theft, piracy, espionage, sabotage or deterioration.

Honesty, fairness and good faith

Honesty and integrity must govern both business and interpersonal relationships and daily professional practices. It is imperative that everyone acts with integrity in all circumstances and helps to promote a culture of honesty and integrity. Based on this principle, the Maggioli Consortium attaches the utmost importance to the exemplary behaviour of its employees.

When choosing its business partners, the Consortium is committed to high standards of honesty, fairness and good faith. The Recipients, in the framework of the most diverse relations established with the Maggioli Consortium, shall refrain from engaging in activities contrary to the ethical and behavioural principles of the Consortium, aware that pursuit of its interests cannot in any way justify conduct contrary to the principles of the Code of Ethics. All activities must be conducted with the utmost commitment, diligence and professionalism in a spirit of mutual respect and cooperation.

In its relations with third parties and stakeholders, the Consortium undertakes to act in a correct manner, avoiding misleading information and behaviour that takes undue advantage of the others' positions of ignorance.

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Confidentiality

The Maggioli Consortium recognises confidentiality as a fundamental, necessary rule of all conduct. It ensures the correct dissemination of the information in its possession and refrains from using confidential data, except with express and conscious authorisation and, in any case, always in the strictest compliance with the current privacy legislation. In the scope of their relations with the Maggioli Consortium and with its interlocutors, Recipients must refrain from using confidential and non-public information, of which they have gained knowledge through their office and/or profession, for personal purposes and, in any case, not connected with the working or professional activity entrusted to them or carried out in the interest of the Consortium.

No employee or collaborator may take any advantage whatsoever, direct or indirect, personal or financial, from the use of confidential information, nor may he or she communicate that information to others or recommend or induce others to use it.

Disclosure of information to third parties must be made exclusively by authorised persons and in accordance with company regulations.

The Maggioli Consortium applies policies and procedures for the protection of information.

Respect for competition

The Maggioli Consortium, aware that a healthy, correct system of competition contributes to the best development of its corporate mission, scrupulously observes regulations in force on competition and refrains from implementing and/or encouraging behaviour that may integrate forms of unfair competition.

The Consortium attaches the utmost importance to respect for market rules and rejects any practice to the contrary. Its employees are urged to adopt irreproachable conduct towards their competitors, customers, suppliers, subcontractors, etc. The following in particular are prohibited: unlawful agreements such as cartels, abuse of a dominant position, bribery, exchange of privileged information, discriminatory, excessive or extortionate pricing, etc.

Any unfair practice, such as collusion with competitors, In order to

- submit agreed bids;
- set a purchase or selling price;
- limit the delivery of services, investments, innovation and their use;
- dividing or segmenting markets, outlets or sources of supply, whether by territory, customer type, or any other criterion;
- eliminate a competitor, customer, supplier or newcomer from the market.

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Recipients shall only use legal and ethical means to obtain information on competitors; by way of example, intrusion and concealment of identity are illegal. It does not engage in defamation or denigration of competitors, and refrains from taking advantage of documents that are inaccurate, falsified or altered.

Value of the person and of human resources

The Maggioli Consortium protects and promotes the supreme value of the human person, who must not be discriminated on the basis of age, gender, sexual orientation, race, language, nationality, political and trade union opinions, religious beliefs.

Human resources represent an indispensable, precious value for the Consortium and its members - for its very existence and future development.

In order to enhance the skills and competences of employees, the Consortium adopts merit criteria and guarantees equal opportunities for all.

The Maggioli Consortium undertakes to ensure that authority is exercised fairly and justly, avoiding any abuse. In particular, authority must never become the exercise of power detrimental to the dignity and autonomy of employees and co-workers in the broadest sense. Work organisation choices must safeguard the value of employees and collaborators.

The Consortium guarantees the physical and moral integrity of its employees and collaborators, working conditions that respect individual dignity and a safe, healthy working environment. Requests or threats to induce people to act against the law and the Code of Ethics, or to behave in a way that is detrimental to their moral and personal convictions and preferences, are in no way tolerated.

The environment

The Maggioli Consortium recognises the value of our natural capital and is committed to reducing the environmental impact of its activities.

The environment is a primary community asset that the Maggioli Consortium wants to help protect. To this end, we pay attention to activities by seeking a balance between economic initiatives and environmental needs, in compliance with laws and regulations applicable, and by lending our utmost cooperation to public authorities in charge of checking, monitoring and protecting the environment.

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4. Standards of conduct

Our standards of conduct relate mainly to:

- A. Integrity in dealing with our business partners
- B. Human resources and the rights of the individual
- C. Protecting our corporate assets
- D. Transparency as a corporate value
- E. Relations with institutions and control Bodies
- F. The environment

A. Integrity in dealing with our business partners

The Maggioli Consortium is especially careful to develop a trust relationship with all possible interlocutors, i.e. individuals, groups or institutions whose contribution is needed to pursue its corporate mission, and with collaborators, customers, suppliers, professionals and consultants, contractors and sub-contractors, business partners, Public Institutions, the market, political, trade union and social organisations (cumulatively the “Business Partners”), whose interests may, directly or indirectly, be influenced by the activities of the Consortium and its Companies.

When performing its activities, the Maggioli Consortium adheres to the principles of loyalty and fairness, requiring honest, transparent and law-abiding behaviour from all those working for it in every relationship they entertain, not tolerating corruptive and/or collusive conduct, nor undue favouritism.

Fully aware of the importance of services rendered, the Maggioli Consortium ensures the transparency of its actions and conduct.

Unlawful Commercial Activities - Anti-Money Laundering

“Money laundering” is a process by which individuals try to hide the proceeds of illegal activities or attempt to make the sources of illegally acquired financial resources appear legitimate.

In the framework of the various relations established with the Consortium, Recipients shall not, in any way and under any circumstances, be implicated in events related to the laundering of money deriving from illegal or criminal activities.

Before establishing relations or entering into contracts with non-occasional suppliers and other partners in business relations, the Consortium and its employees and/or collaborators shall ensure the moral integrity, reputation and good name of the counterparty.

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Conflicts of interest

Conflict of interest is a situation where a person pursues an interest other than that of the company for which he or she works, or engages in activities that may, in any event, interfere with his or her ability to make decisions in the sole interest of the company, or personally take advantage of business opportunities.

When conducting activities, Recipients must absolutely avoid situations where the people involved in transactions are or may be in conflict of interest. In doubt, it is prudent to make sure that you are not in a conflict of interest situation, for instance if:

- you have, or an acquaintance of yours has, an interest in a company, a Public Entity, a publicly owned company or a customer, competitor or supplier of the Maggioli Consortium companies or with which the Maggioli Consortium has ongoing tenders or bids;
- you perform a professional activity outside the Maggioli Consortium;
- hold responsibilities in public customer associations or bodies.

In a conflict of interest, Recipients shall refrain from participating in the tasks and assignments entrusted to them and inform the Code of Ethics Officer without delay or use the whistleblowing channel.

Anticorruption

The term "corruption" means offering, promising, giving, accepting or soliciting an undue advantage (of a financial or non-financial nature), directly or indirectly and irrespective of the position held, in breach of applicable laws, as an inducement or reward for a person to act or refrain from acting in connection with the performance of that person's duties.

Corruption can be of two types:

- active corruption, which consists in providing an illicit advantage to others in order to alter a decision-making mechanism (authorisation, right, supply, procurement or contract, etc.);
- passive corruption, which consists in receiving an undue advantage in return for an omission to perform an action contrary to one's duties. Passive corruption is not necessarily solicited; on the contrary, it may go as far as extortion.

Corruption generates costs that reduce economic efficiency, on the one hand by depriving communities of some services that benefit a few, and on the other by diverting the company from its continuous effort towards technological and competitive growth. Corruption can also undermine the dignity and integrity of those involuntarily affected. For these reasons, the Consortium and its members condemn corruption in all its forms, at any time, place or circumstance.

The Maggioli Consortium condemns the use of unlawful or otherwise improper conduct (including corrupt practices, without exception) to achieve its economic objectives.

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Anti-corruption regulations classify as unlawful, for Recipients, business partners and anyone who carries out an activity in favour of or on behalf of Maggioli Consortium, the offer, payment and acceptance, directly or indirectly - even only attempted - of money or other benefits to obtain or maintain a business deal or secure an advantage related to the business activity.

The rules of conduct adopted by the Maggioli Consortium are based on compliance with the law and are inspired by the principles dictated by the OECD International Convention on Combating Bribery, the UK Bribery Act and the US Foreign Corruption Practice Act (FCPA).

Gifts and hospitality

It is forbidden to distribute gifts to Public Administration officials, public officials and public employees that are not of a modest value (indicatively €100) and in any case can not compromise the integrity or reputation of one of the parties and cannot be interpreted, by an impartial observer, as aimed at acquiring improper advantages.

Should doubts arise on the modest value of gifts offered or received, the Recipient shall promptly inform the Code of Ethics Manager.

It is also forbidden for Consortium employees and Consortium members to receive gifts, presents or any other utility from suppliers or anyone else who produces, sells or promotes goods, merchandise or services, unless they are promotional items of modest value (indicatively € 100); in any case cannot compromise the integrity or reputation of one of the parties and be interpreted by an impartial observer as aimed at acquiring improper advantages.

Conferences and Congresses

The organisation of conferences is always connected to the role played by the Maggioli Consortium in the publishing and information sectors, and must be inspired by ethical, scientific and economic criteria. The invitation of Public Officials to conferences and congresses is subject to the existence of a specific relevance between the subject matter of the conference and the specialisation of the Public Officials taking part. The primary objective of participating in or organising national and regional conferences and congresses must be to disseminate information of interest to participants and useful to them in the performance of their duties.

The Consortium maintains collaborative relations with professional associations provided that they are inspired by dissemination of learning and improvement of professional knowledge, and are carried out in collaboration with organisations of proven reliability and national standing, whose mission is well known.

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Commercial relations with public and private customers

Relations with public administrations, public bodies, including economic ones, and local, national or international public bodies or companies must be characterised by the strictest compliance with laws in force, and by adherence to the principles of honesty, fairness and transparency and compliance with existing internal procedures.

During commercial negotiations or business relations with the Public Administration, in Italy or in other countries, the Consortium must refrain from conduct contrary to the principles set out above, including by way of an

illustrative and not exhaustive example:

- offering or granting employment opportunities and/or commercial advantages to Public Administration personnel involved in the negotiation or relationship, or to their family members;
- offering or receiving gifts or other benefits, unless they are acts of commercial courtesy of modest value;
- providing untruthful information or omitting to communicate relevant facts, where requested by the Public Administration.

The personnel responsible for negotiating and managing tender procedures, preparing offers and/or negotiations in direct negotiation, and for managing contractual relations with the Public Administration must ascertain the truthfulness and correctness of declarations made to it, with special reference to information concerning the possession of requirements, or costs and financial data.

In relations with Customers, the Employees and Collaborators of the Maggioli Consortium, based on their corporate roles and responsibilities, shall

- scrupulously follow procedures issued;
- provide accurate, complete, clear and truthful information on the products and services offered and, in any case, in compliance with laws and regulations in force, without resorting to elusive or otherwise unfair practices;
- not to disseminate communications that may in any way be misleading for the Customer's decision. Behaviour towards customers is inspired by helpfulness, professionalism and transparency.

The right to compete

The Consortium recognises the value of competition in a highly competitive market such as development of software solutions and is committed to complying with the antitrust regulations applicable in the countries where it operates. In particular:

- does not enter into contracts or agreements with competitors in order to restrict dynamic and fair competition with and between them;
- independently determines the prices and conditions of sale of our products and services and does not sell at prices below their cost of production;
- does not use relations between the Consortium and customers to induce them to treat competitors unfairly.

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Relations with counterparts

The Maggioli Consortium manages relations with its counterparts (suppliers, professionals, consultants, contractors and sub-contractors) with loyalty, fairness and professionalism, encouraging ongoing collaboration and solid, long-lasting trust relationships.

The selection of counterparts and establishment of terms and conditions for the purchase of goods and services are based on objective, impartial evaluations, objective requirements of integrity, quality, efficiency and cost-effectiveness, and ensuring sufficient competition (e.g. considering several companies in the selection).

The Consortium observes the following principles in its relations with counterparts:

- purchasing is referred to a specific office;
- The Consortium neither practices nor endorses any form of “reciprocity” with suppliers, professionals and consultants: the goods/services that Consortium companies seek are selected and purchased solely on the basis of their value in terms of price, quality and technical skills required;
- any negotiations with an actual or potential supplier, professional or consultant must relate solely to the goods and services being negotiated;
- the personnel in charge of the purchase of goods and services must not be subject to any form of pressure from the counterparty, for any counter-performance, including donation of materials, products and/or sums of money, also in favour of charity/solidarity associations or similar.

Assumption of commitments and management of relations with current and potential suppliers must be carried out in compliance with the guidelines on conflict of interest and business management.

Partners, suppliers and subcontractors implement the commitments of the Maggioli Consortium Code of Ethics in the field of anti-corruption, respect for human rights and environmental protection.

To preserve its values and standards of behaviour, the Consortium is committed to working only with suppliers who

- do not use child labour contrary to local or international regulations;
- guarantee a safe and healthy workplace;
- do not behave in a discriminatory manner towards employees, customers and suppliers;
- do not pursue forced labour;
- do not use an irregular workforce.

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Business Reg. and Tax Code 04623050400 - VAT number IT 04623050400
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B. Human Resources and the rights of the individual

The Consortium recognises the centrality of human resources in the conviction that the most important success factor of any business is guaranteed by the professional contribution of people working for it, in an environment of loyalty and mutual trust.

The Consortium recognises respect for the work, professional contribution and commitment of each individual, respect for different opinions as indispensable principles regardless of seniority and experience, and the strength of ideas.

On defining our values we refer to the International Labour Conventions and Recommendations issued by the ILO (International Labour Organisation).

We are committed to promoting diversity and inclusion and building a culture in which all employees feel welcomed and valued and have equal opportunities. With this in mind, the Consortium ensures equal opportunities at any level of the organisation, based on criteria of merit and without any discrimination.

Employees and collaborators are, on the other hand, required to commit themselves and act loyally, ensuring the services due and commitments made to the Consortium.

Moreover, well aware that professionalism is a value acquired through practice, experience and specific training, the Maggioli Consortium recognises the decisive contribution that this process receives from professionals with greater seniority and promotes the transfer of their knowledge and professional attitude to younger staff.

The Consortium pursues enhancement of professionalism, promotes individuals' aspirations, learning expectations and professional and personal growth.

Safe, sustainable working environment

The Maggioli Consortium guarantees working conditions that respect individual dignity and safe, healthy working environments, through the dissemination of a culture of safety and risk awareness, promoting responsible behaviour by all.

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With this in mind, each employee and collaborator is called upon to personally contribute to maintaining the quality of the working environment.

We commit ourselves to:

- prevent occupational injuries and illnesses, so we invest in creating safe, sustainable working environments;
- implement safe activities in order to protect the health of its employees and the community surrounding its premises, aligning its operational strategies with the company's safety, health and environmental policy;
- periodically review the performance and efficiency of its systems to achieve its safety, health and environmental targets.

We ask our employees to attend and complete training and refresher courses on safety at work and to understand and comply with the rules and procedures established to safeguard health and prevent accidents.

Selection and placement

The Maggioli Consortium recognises the value of people and their differences through a diversified approach to human resources management, ensuring the same professional growth opportunities for all the people in Consortium companies.

The selection process is carried out with respect for equal opportunities and the individual, in a structured, clearly explained way. We provide the candidate with correct and comprehensive information about the organisation and the position for which he/she will be assessed.

We are committed to implementing all activities that facilitate the inclusion of the new employee in a collaborative environment that fosters professional growth.

Work organisation

The Maggioli Consortium envisages overall planning of activities to ensure that each person occupies the most appropriate role; maximising the use of the organisation, while respecting equal opportunities.

To this end, it constantly updates the organisational responsibilities, competences and functions performed by existing staff.

Employees undertake to take responsibility for the tasks assigned to them and act cooperatively throughout the collaboration period.

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When defining and managing working hours and shifts, the Consortium balances, as far as possible, work requirements respecting employees' leisure time and quality of life.

On the other hand, each employee must respect the hours and shifts assigned and report absence in good time.

For work reorganisation, the value of human resources is safeguarded by providing training or retraining when needed.

Bargaining and worker representation

The Consortium contributes to the economic well-being and growth of the community it operates in. For this, when performing its activities it is guided by respect for local and national communities, favouring dialogue with trade unions or other associations.

The Consortium bases relations with political parties or their representatives or candidates on the strictest compliance with current legislation and company directives. It neither promotes nor maintains any kind of relationship with organisations, associations or movements that pursue, directly or indirectly, criminal purposes or, in any case, purposes forbidden by law.

Promotion and protection of employment

We are committed to strategies that combine business growth and profitability with the protection and development of employment, and to promoting the quality of work through professional growth based on meritocracy and supported by continuous training.

Discrimination and harassment

The Consortium does not tolerate any discriminatory conduct or any form of harassment and/or personal or sexual offence. We are committed to providing a work environment that excludes any form of discrimination and harassment related to race, gender, religion, nationality, age, sexual orientation, disability or other non-work-related personal characteristics.

Any illegal conduct or any form of abuse, threat or aggression against people or company property is strictly forbidden in the workplace.

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Personnel are required to report any conduct of this type, and any alleged breach of rules, directives or procedures to their supervisor, who will report, guaranteeing confidentiality, to the Human Resources department which, after carrying out the controls and assessments needed, will consult vis-à-vis the Board of Directors, providing an opinion on the measures to be taken.

Privacy and personal data

When carrying out its activities, the Consortium processes the personal data, even of a sensitive nature, of its customers, including the public administration, employees and service users.

The databases managed by the Consortium may contain personal data that are protected by the privacy legislation, data that cannot be disclosed externally and finally data whose disclosure could cause damage to the Consortium itself.

The Consortium requires employees and the employees of its partner companies to commit, within the scope of their duties, to guaranteeing that personal data are processed in compliance with the legislation in force each time and with the principles of lawfulness, correctness and transparency, limitation of purposes and storage times, integrity and confidentiality.

We guarantee the confidentiality of the information in our possession, comply with regulations on the collection, processing and storage of personal data, and refrain from seeking confidentiality through illegal means.

We are constantly trying to strengthen and improve measures to protect the information and data we process, in all situations and ways. We respect the privacy of our customers, the users of our Business Partners and all persons whose data is directly or indirectly processed by us.

We comply with European legislation on personal data and privacy of our employees, collaborators, suppliers and users of our services. It is forbidden to communicate and/or disclose confidential information and sensitive data except in a way and in compliance with procedures laid down in the GDPR (EU Regulation No. 679 of 2016) on the protection of personal data.

It is in no way permitted for anyone who comes into possession of information of corporate interest and/or relating to any stakeholder to disseminate or use it outside what it has been authorised or for purposes not related to the exercise of its activity.

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C. The protection of corporate assets

Confidentiality of information

All information available in the company and relating to customers is considered confidential and proprietary.

The Maggioli Consortium guarantees the confidentiality of the information in its possession and refrains from seeking and exploiting confidential data, information or content except with express, aware authorisation.

We guarantee that the use of confidential business information only takes place within the scope of the business and professional relationship and that its disclosure to the outside world is prohibited.

IT security

The Consortium and its resources are committed to building and protecting its information systems and the wealth of data and information they contain from cyber security risks.

In a context where cybersecurity risks are constantly evolving, the Maggioli Consortium invests resources and energy to mitigate both internal and external risks. We are committed to ensuring the business continuity of our systems and the IT solutions we implement for our customers

The protection of corporate assets

Company systems are designed and granted to enable work to be done effectively, efficiently and correctly. Company assets granted to employees are the property of the Consortium.

Each employee is required to work diligently to protect the company assets, through correct, responsible conduct in line with the operating procedures drawn up to regulate their use, accurately documenting it.

In particular, Recipients are required to :

- carefully use assets entrusted to each one;
- avoid improper use of company assets that may cause inefficiency or prejudice company interest.

Each Recipient is responsible for the protection of assets entrusted to him/her and must promptly inform the appropriate functions of any threats or events harmful to the Consortium.

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D. Transparency as a corporate value

Correctness and transparency of corporate information

When preparing and approving the annual financial statements, the interim economic and financial situations and in the drafting and dissemination of corporate communications in general, the corporate bodies and functions involved ensure compliance with the law, bylaws and regulations and the documentation and correctness of deeds and decisions taken. Similar conduct must be maintained by the corporate bodies and other persons involved related to accounting activities and with regard to persons required to render - by law or by virtue of a decision of the Consortium - opinions, reports, estimates or other judgment regarding documents, deeds or operations concerning the Consortium.

Account transparency is based on the truth, accuracy and completeness of basic information for the relevant accounting records. Each employee is required to cooperate to guarantee that management facts are correctly, promptly represented in accounts.

Adequate supporting documents of the activity performed are stored for each transaction:

- easy bookkeeping;
- identification of different levels of responsibility;
- accurate reconstruction and documentation of the operation, to reduce the likelihood of misinterpretation.

Each record must reflect exactly what is shown in the supporting documents. It is the duty of every employee to make sure that documentation is easily traceable and ordered based on logical criteria. Consortium employees who become aware of omissions, falsification, negligence in accounting or in the documents on which account records are based, are required to report the facts to their superior and to the Internal Auditor.

Accounting and internal control

Every action, operation or transaction must be correctly recorded in the company's accounting system in accordance with criteria indicated by law and applicable accounting principles, and must also be duly authorised, verifiable, legitimate, consistent and congruous.

Adequate, complete documentation to support accounting records must allow:

- accurate accounting records;
- immediate identification of the characteristics and motives underlying the transaction;
- easy formal and chronological reconstruction of the transaction;
- control of the decision-making, authorisation and implementation process and identification of the various levels of responsibility.

Each employee and collaborator shall, to the extent of his/her responsibility, ensure that any fact relating to management of the Consortium is correctly and promptly recorded in accounts.

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Internal control

At every company level, the Maggioli Consortium promotes and disseminates the culture of control, making its employees aware of the importance of the internal control system and of compliance, when performing their work activities, with current regulations and company procedures, in order to:

- ascertain the adequacy of the various business processes in terms of efficiency, effectiveness and cost-effectiveness;
- ensure the reliability and correctness of accounting records and the protection of company assets;
- ensure compliance of accounting and tax compliance with current legislation and internal directives

Internal control systems include the control activities that the individual corporate functions perform on their own processes, in order to protect corporate assets, effectively manage corporate activities and provide clear information on the equity, economic and financial situation, and all those activities to identify and contain corporate risks.

Employees and collaborators are obliged, for their area of responsibility:

- to actively cooperate in the proper, effective operations of the internal control system;
- to responsibly safeguard company assets, whether tangible or intangible, instrumental to their activity and not to misuse them.

The relevant corporate functions are guaranteed free access to data, documents and any information needed to carry out controls.

E. Associations, Institutions and Control Bodies

Relations with public, national, EU and/or international institutions, and with public officials or those in charge of a public service, or bodies, representatives, agents, exponents, members, employees, consultants, those in charge of public functions, Public Institutions, Supervisory Authorities and/or other Independent Administrative Authorities, must be strictly compliant with the laws in force; those relations are solely assigned to the persons authorised to do so based on current proxies and powers of attorney conferred by each Board of Directors of the Consortium companies.

The Consortium and its companies maintain relations with public institutions in a spirit of loyalty, fairness and transparency, and in compliance with current legislation.

The Consortium and its companies undertake to maintain an attitude of maximum cooperation, based on transparency and fairness, towards the above-mentioned subjects, with whom they have relations in any capacity. Contacts with public institutions are reserved for the functions delegated to hold them and for those expressly assigned to do so.

The Consortium and Consortium members undertake to establish, without any discrimination, stable channels of communication with all institutional interlocutors at international, national and local level and to represent their interests and positions in a transparent, rigorous and consistent manner, avoiding collusive attitudes.

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Relations with independent administrative authorities

The Consortium is committed to scrupulously observing rules dictated by Public Supervisory Authorities (e.g.: The Authority Guaranteeing Competition and the Market, Authority for the Protection of Personal Data, etc.) for compliance with regulations in force in the sectors related to their activities.

Recipients undertake to comply with any request that may be made by Independent Administrative Authorities while exercising their functions and to provide full cooperation during investigative procedures.

To ensure maximum transparency, the Consortium undertakes not to find itself in situations of conflict of interest with officials/employees of Independent Administrative Authorities or their relatives.

In relations with those authorities, no form of gratuity is allowed that is in any way aimed at acquiring favourable treatment in any activities in any way connected to the Maggioli Consortium. This rule covers gifts promised or offered and those received, a gift being any kind of benefit.

Relations with interest groups

The Maggioli Consortium holds a constructive dialogue with representative associations and organisations that are actively committed to improving civil, social, environmental and cultural conditions.

We establish, where possible, a stable channel of communication with the associations representing our “stakeholders” in order to cooperate respecting mutual interests, present the Consortium positions and prevent possible conflict situations.

The Consortium relations with private entities, such as NPOs and other non-profit organisations, must be inspired by the strictest compliance with laws applicable and may in no way compromise the Consortium integrity and reputation.

Assumption of commitments and management of relations, of any kind, with private entities, are reserved solely for the company departments assigned to this purpose and to personnel authorised to do so in compliance with the system of delegated powers, job descriptions and company procedures.

The Board of Directors may envisage, through creation of a “Social Responsibility Fund”, the chance to support charitable works of a social and cultural nature.

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Supporting local communities

It is the Maggioli Consortium commitment to contribute positively to promoting the quality of life, to the socio-economic development of the communities where it operates and to the formation of human capital and local skills, while carrying out its business activities in a manner compatible with sound business practice.

We respect the cultural, economic and social rights of the local communities where we operate and contribute to their implementation wherever possible.

F. The environment

The Maggioli Consortium recognises the value of our natural capital and is committed to reducing the environmental impact of its activities.

The environment is a primary community asset that the Maggioli Consortium wants to help protect. To this end, we take care of our activities by seeking a balance between economic initiatives and environmental needs, in compliance with laws and regulations applicable, and we cooperate to the utmost with the public authorities in charge of verification, surveillance and environmental protection

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