

BELLAGAMBA



Code of conduct and integrity



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Informazioni sul documento

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1. Who we are

From 1981 Bellagamba Company realizes exclusive and bespoke architectural and interior decoration projects and supplies unique custom made furniture in different European and Middle-Eastern countries.

2. Mission

Our Mission is to develop and promote around the world the Italian excellence in design and architecture fields, through an extremely high standard quality of projects and works, always following the value and tradition of Made in Italy.

3. Why this code

The Company adopted this Code because believes that the quality of the projects has to be always supported by integrity and conduct rules, that safeguard the values of the Clients and the inclusivity¹ of the stakeholders.

The Code was organized² to provide clear rules regarding the Company mission and intends to be a guide for the people that work and collaborate with the Company, for its Clients and the Institutions. For this reason, the Code is focusing on the rules of **Market relation** and in particular on the relation throughout the supply chain; the more operative aspects are instead ruled through specific internal guidelines.

The Code **takes inspiration from the general principles** of OCSE in terms of integrity and prevention of corruption, in particular of the international corruption, in no way the present Code must violate the legislative dispositions applicable in the relevant Countries.

The violation of the prescription included in the present Code, by employees, partners and any subject that has a commercial and/or contractual relation with the Company, implicates the sanctions foreseen by the disciplinary code.

¹ In conformity of what defined by ISO 26000.

² The present Code is approved by the board of directors and comes into effect from the present date and cancels and substitutes any previous version. Any variation or integration of the present Code will be approved following the same rules and promptly transmitted to the addressee. The present document is available on the Company website.

4. Our principles

- **Principle of legality (observance of the rules)**
As part of the activity, the employees and collaborators of the Company are required to diligently comply with the laws in force, this Code, the protocols and procedures adopted by the Company.
- **Accountability**
The Company must always be able to "account" for its work, through an operational and responsible approach to "compliance".
- **Sustainability**
In a logic of value creation, every economic aspect of corporate activity must always be carried out considering also its sustainability.

5. Our commitments towards the Market

Commercial activity must always be based **on respect for operators** on the market and respect for competitors.

The communications and contracts with the customers must be clear and simple, formulated in a language as close as possible to that normally used by the interlocutors, compliant with current regulations, such as not to configure elusive or otherwise incorrect practices; moreover, communications and contracts with customers must be complete so as not to neglect any relevant element, for the purposes of the customer's decision. The style of behavior of the staff towards the customers must always be based on **willingness, respect** and **courtesy**, in order to have a collaborative and highly professional relationship.

The lobbying activity must be **transparent**, easily recognizable and linked to the safeguard of the values of this Code.

The conduct with public sector officials must be respectful of their code of conduct, which all staff are committed to knowing. For no reason should it be made to believe that the activities carried out are linked to an exchange of favors or similar behavior. This principle also applies to **parties, representative subjects** or other **entities with collective purposes**.

No person connected to the Company must give money, or offer economic **advantages** or other types of **benefits** to subjects of the Public Administration, in order to obtain assignments or other advantages, personal or for the Company.

In carrying out operations and in maintaining relations with the Public Administration, the persons must ensure **maximum transparency and traceability of relevant information**.

Particular precautions must be observed in operations relating to **authorizations, concessions, licenses** or any **requests for public funding** (regional, state or community).

In the event that the Company needs professional services of employees of the Public Administration, as consultants, the current legislation must be respected; the personnel selection procedures must foresee the **causes of incompatibility** of public sector

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employees. In carrying out any activity of interest of the Company, the situations where the subjects involved are in a **conflict of interest** must be "avoided"; in particular, a conflict of interest is considered to exist in the event that an employee, a collaborator or a director pursues an objective different from the Company purpose, in other words if voluntarily procures or attempts to obtain a personal advantage on the occasion of carrying out activities carried out in the interest of the company or procure it to third parties.

No worker must take advantage of situations and events related to the Company. In particular, **significant and relevant financial investments/shareholding** in companies in possible conflict of interest cannot be maintained. **Limits** are periodically defined and agreed, **exceptions** must be approved by management. This principle is also applied to aspects such as granting of loans, sureties, mortgages or subsidized rents.

All **confidential or potentially confidential information** related to commercial activity or aspects of the personal sphere must always be considered confidential and must not be disclosed in any way, even after the termination of the employment or contractual relationship. Legal obligations are reserved.

It is underlined that the **privacy** of the employee or collaborator is protected by adopting all the measures and safeguards for the processing and storage of information required by current legislation.

The employees or collaborators of the Company must conform their behavior to the utmost **confidentiality** even outside working hours, in order to save the technical, legal, administrative, personnel management and commercial know-how of the Company.

All those who, following the fulfilment of their tasks of management, control and service, come to have **confidential and relevant information**, are required not to abuse this privilege.

Even with a positive approach to the diffusion of knowledge, the rules **on intellectual property and patent protection** must be respected, with particular reference to **intellectual property and industrial design**.

It is forbidden to give or promise in any form, **gifts, gratuities or granting benefits** to persons who have commercial or entrepreneurial relationships with the Company, except in the case in which such forms of gifts, gratuities or benefits are of **moderate value** and are part of the ordinary practices.

In any case, each employee or collaborator of the Company, before proceeding with the offer of gifts, gratuities or benefits that exceed the modest value, must request **express authorization** from the Management.

The directors, statutory auditors, employees or collaborators of the company **are prohibited from receiving gifts, gratuities or benefits** from persons who operate with the Company and in relations of the Company's activities.

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This principle also applies to forms such as **donations** of money or kind, **sponsorship**, invitations or benefits of any kind.

6. Whistleblowing

The advisories can be sent to the dedicated and confidential email address (certified and independent service): **bellagamba@ethicpoint.ue**

No sanction can be executed, not even in the case of incorrect reports, as long as in good faith.

7. Sanctioning regulations

The compliance of the rules of this Code must be considered an integral part of the **contractual obligations** of the employees of the organization pursuant to and for the purposes of art. 2104 of the Civil Code.

The violations of the rules of this Code may constitute, for employees, **the non-fulfillment of the primary obligations** of the employment relationship or **disciplinary offense**, in compliance with the procedures provided for by art. 7 of the statute of workers, with all the consequences of the law, also regarding to the preservation of the employment relationship, and may implicate compensation for damages deriving from the same.

The compliance with the Code must be considered an integral part of the contractual obligations assumed by non-subordinate collaborators or subjects having business relations with the organization. The violation of the rules of this Code may constitute the **non-fulfillment of the contractual obligations**, with all legal consequences, including in relation to the termination of the contract or the assignment and may result in compensation for damages deriving from the same.

The organization undertakes to foresee and impose, with coherence, impartiality and uniformity, **sanctions proportionate** to the respective violations of this Code and in compliance with current provisions on the regulation of employment relationships.