

HOTELMAN SINGER PALACE HOTEL SRL



# CODE OF CONDUCT

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Rev. 1.1

in consultation with



**STRUCTURE:****Company Name:** HOTELMAN SINGER PALACE HOTEL SRL**VAT:** IT12969151005**Registered Office:** via Lutezia 11, 00198 Roma

in consultation with:

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The following document, at its latest revision, was approved and then adopted by the Sole Administrator,

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Signature \_\_\_\_\_

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## 1. DEFINITIONS

- "Code of Conduct": document containing the general principles of conduct that the Recipients must adhere to, also with reference to the activities referred to in the Organisation, Management and Control Model adopted by the Company;
- "Consultants": those who act in the name and/or on behalf of HOTELMAN SINGER PALACE HOTEL SRL based on a mandate or on other professional collaboration relationship;;
- "Recipients": Directors, Employees, Outsourcers and other individuals with whom the Company comes into contact in carrying out business relations;
- "Employees": all Employees (including Managers) of HOTELMAN SINGER PALACE HOTEL SRL;
- "Legislative Decree 231/2001": the Legislative Decree no. 1 of 8 June 2001 and subsequent amendments and additions. \The legislative decree containing the regulation on the administrative liability of legal entities, companies and associations, even those without legal personality dependent on a criminal offence.\
- "Model": Organisation, Management and Control Model of the Company, which includes the set of processes and rules of conduct which guide the execution of the Company's activities, in accordance with the law establishing the Administrative Liability of Legal Entities (Legislative Decree 231/2001);
- "Supervisory Body" or \SB\": the internal supervisory board, in charge of supervising the functioning and compliance of the Model as well as its updating;
- "Corporate Bodies": the Board of Directors, the Managing Directors, the Board of Statutory Auditors;
- "PA" or \Public Administration\": all state administrations;
- "Partners": all Workers other than Employees who provide their services to HOTELMAN SINGER PALACE HOTEL SRL such as, for example, para-subordinate Workers, service providers, including intellectual services, Consultants and all other self-employed Workers, all contractual counterparties of HOTELMAN SINGER PALACE HOTEL SRL - natural persons and/or legal entity and/or institutions- and in any case all individuals (including Suppliers) with whom the Company enters into any form of collaboration, de facto and/or based on a specific contractual agreement;
- "Criminal offences": the types of crimes to which is applied the regulation provided for by the Legislative Decree 231/2001, also following its subsequent amendments and additions;
- "Disciplinary System": set of sanctions applicable in the event of violation of the Model;
- "Stakeholders": all those who, directly or indirectly, establish a relation with HOTELMAN SINGER PALACE HOTEL SRL, such as shareholders, Customers, Employees and Partners, but also the authorities to which the Company refers to in its operations. More generally, all individuals who are in various capacities interested in the existence and operations of the Company and whose interests influence or are influenced by the effects of its activities are considered stakeholders of said company.

## 2. INTRODUCTION

HOTELMAN SINGER PALACE HOTEL SRL manages tourism, accommodation and hotel businesses. The Company, aware of the importance of the social contribution applied by business activities, intends to pursue the search for competitiveness on the market through the correct and functional use of its resources, in full compliance with current regulations, principles of integrity and transparency, protection of the environment and of the physical and moral integrity of individuals, also with the aim of increasing its ability to produce value and create well-being for the community.

The following document, called the Code of Conduct, regulates the complex of rights and responsibilities that HOTELMAN SINGER PALACE HOTEL SRL explicitly assumes towards those with whom it interacts in carrying out its business. Integrity and ethics have always characterised the *modus operandi* of HOTELMAN SINGER PALACE HOTEL SRL, whose activity is based on the values of transparency, correctness, honesty and confidentiality.

HOTELMAN SINGER PALACE HOTEL SRL undertakes to ensure its management in accordance to the principles outlined in the following Code and that all Recipients (members of the Governing Bodies, Employees, Collaborators, Consultants and Partners, Suppliers) are required to comply with them.

The Code of Conduct also has the purpose of introducing and making the principles and rules of conduct relevant for the reasonable prevention of the criminal offences indicated in Legislative Decree 231/2001 binding for the company.

The following document forms an integral part of the organisation Model adopted by HOTELMAN SINGER PALACE HOTEL SRL pursuant to Legislative Decree 231/2001 and is aimed at identifying the set of ethical principles and values that must inspire the conduct and behaviour of those who in any capacity operate in the interest or on behalf of the Company.

## 3. RECIPIENTS AND FIELD OF APPLICATION

The Code of Conduct is aimed at:

- Members of the Corporate Bodies
- Employees and Collaborators (both fixed-term and permanent)
- Consultants, external Partners and internal Partners
- Suppliers of goods and services
- Any other individual who can act in the name and on behalf of the company either directly or indirectly, permanently or temporarily, or those who establish relationships or connections with the company and work to pursue its objectives.

The recipients of the following Code of Conduct are required to learn its contents and comply with its precepts. Company Employees, in addition to complying with the regulations in force and the provisions outlined in the collective bargaining, where applicable, undertake to adapt the methods of performance of the work activity to the purposes and provisions outlined in the following Code of Conduct. This both in intra-company relations and in relationships with individuals external to the company and, in particular, with the Public Administrations and other public authorities. An essential requirement of any fruitful collaboration with the company is represented by the compliance, by other recipients, with the principles and provisions contained in the following Code of Conduct.

## 4. THE ORGANISATION, MANAGEMENT AND CONTROL MODEL

It is a management tool which, in light of the criminal offences envisaged by the Legislative Decree 231/2001, of the activity carried out by the company and of the assessment of the risks that the company faces in this regard, provides for a system of rules, correct operating procedures, checks and controls and for sanctions in the case of violations, aimed at preventing the commission of criminal offences.

The Organisation Model consists of:

- the Code of Conduct;
- mapping of sensitive activities: it consists of a specific analysis of the company areas in which a criminal offence could be committed, evaluated in terms of risk;
- the disciplinary system: includes an adequate system of sanctions, as a consequence of the violation of the rules of conduct outlined in the Code of Conduct, in the Procedures and in the Protocols envisaged by the Organisation Model;
- training and communication: for effective application and compliance with the Organisation Model by all company resources, a training and communication plan is expected at the various levels within the company;
- operating procedures: include all company procedures, which establish the correct operational methods for the implementation of all company processes.

## 5. VIOLATION OF THE CODE OF CONDUCT AND DISCIPLINARY SYSTEM

In addition to fulfilling the general duties of loyalty, correctness and execution of the employment contract in good faith, Employees must comply with the ethical principles and behavioural rules of the following Code of Conduct, the observance of which is an essential part of the contractual obligations pursuant to and for the purposes of articles 2104 and 2105 of the Civil Code. Therefore, the principles and contents of the following Code of Conduct constitute exemplary specifications of the diligence, loyalty and impartiality obligations imposed by law on Employees and which qualify the correct fulfilment of work performance and general behaviour towards the Company.

The violation, by the Employees, of the rules and principles of the following Code of Conduct will therefore constitute a breach of the obligations of the employment relationship and/or a disciplinary offence, with all the consequences provided for by law and by the applicable Collective Labour Agreement (Trade, service industry).

With reference to the Partners, the ethical principles and behavioural rules - which will be appropriately referred to in the relative contract - will constitute real contractual obligations, also in accordance with the principle of good faith in the execution of the contract. Violation of the following Code of Conduct by the Partners may determine the consequences envisaged by the Disciplinary System and eventually also lead to the termination and/or annulment of the contractual relationship. Furthermore, any compensation for damages that the company may suffer as a result of the violation of the provisions contained in the Code of Conduct by the aforementioned parties remains reserved.

## 6. GENERAL ETHICAL PRINCIPLES

The following Code of Conduct was developed to ensure that the fundamental ethical principles of HOTELMAN SINGER PALACE HOTEL SRL are explicitly defined and constitute the basic element of the corporate culture, as well as the standard of behaviour for all interested parties.

### 6.1. Principle of legality and integrity

The Company has, as an imperative ethical principle, the respect for the legislation in force in all the countries where it operates. The Company will not initiate or continue any relationship with any party who does not intend to strictly comply with said principle. The Company pursues its business objectives in compliance with the principle of integrity, understood as correctness, honesty and loyalty in internal and external relationships of the company.

### 6.2. Principle of competition and market protection

The Company carries out its business in strict compliance with legal provisions on the subject of competition and market protection and refrains from any deceptive or inappropriate behaviour and from any form of unfair competition or misleading advertising.

### 6.3. Principle of transparency and professionalism

HOTELMAN SINGER PALACE HOTEL SRL recognizes the fundamental value of correct, complete and timely information, which it guarantees to all interested parties, with regard to its objectives, activities and results, in a complete and exhaustive way and through the most suitable tools. The Company carries out its activities in compliance with the principle of transparency and professionalism, the latter understood as a commitment to adapt its operational standards to a level of maximum diligence, in constant pursuit and application of the best technologies and knowledge and focusing on improvement.

### 6.4. Principle of equality and non-discrimination

The Company recognizes the equal dignity of all individuals working on its behalf and alongside it and does not admit any form of discrimination based, for example, on age, sex, sexuality, health, cultural identity or nationality, political opinions and/or religious beliefs. HOTELMAN SINGER PALACE HOTEL SRL also guarantees equal treatment for all its Customers and prohibits any form of discrimination based on race, sex, religion, sexual orientation, age, trade union membership, political affiliation and any other potentially discriminatory reason.

### 6.5. Principle of solidarity

distinctive sign of all its activities. The foundation of every relationship or transaction between economic entities is always constructed from human relationships.

### 6.6. Principle of confidentiality

HOTELMAN SINGER PALACE HOTEL SRL guarantees the confidentiality of information relating to members of the Corporate Bodies, Employees, Collaborators, Consultants and Partners, Suppliers and

Customers, in compliance with the legal provisions and contractual agreements in force. Each employee or collaborator, within the scope of their respective functions, is required to protect the information generated or acquired and to avoid improper and unauthorised use.

### 6.7. Principle of autonomy and pluralism

HOTELMAN SINGER PALACE HOTEL SRL considers pluralism a value and, in the relationships it maintains with other organisations, political and social forces, it respects their nature, opinion and culture while acting according to its own originality, autonomy and ability to propose. In order to make all personnel aware of the provisions of the following code, a copy of the same is available to all Employees/Collaborators. It is the right/duty of everyone to contact their superiors in case of need for clarification on the methods of application of the rules of the Code of Conduct.

## 7. PRINCIPLES OF CONDUCT OF THE ADDRESSEES

### 7.1. General principles of conduct

In implementation of the Company's ethical principles as outlined above, the Recipients must:

- adopt all necessary measures to prevent the violation of the Company's ethical principles and supervise their observance;
- comply with the legislation in force in all the countries where the Company operates;
- comply with all the provisions adopted by the competent Authorities with respect to the Company;
- refrain from engaging in illegitimate or inappropriate behaviour in order to achieve the business objectives; • protect and enhance human resources by guaranteeing equal opportunities for human and professional growth, as well as working conditions that respect the dignity of the individual;
- use corporate resources responsibly, in order to respect the environment and the rights of future generations and to refrain from using them for purposes other than their own;
- compete fairly on the market, refraining, among other things, from engaging in and/or encouraging behaviour that could integrate forms of unfair competition, prevent or disturb the exercise of an industry or a commerce;
- comply with the applicable law regarding market abuse;
- refrain from engaging in activities and/or behaviours in contrast with the tasks and responsibilities assigned to them;
- refrain from pursuing personal or third-party interests to the detriment of corporate interests;
- refrain from using the Company's name and exploiting its reputation, for personal and/or for third-party interests;
- comply with the applicable law concerning the reporting of illegal activities.

### 7.2. Customer Relations

At the basis of the corporate values, and fundamental for business continuity, is satisfying customers through the provision of cutting-edge products and services. HOTELMAN SINGER PALACE HOTEL SRL



promotes customer relations based on honesty, transparency and integrity, therefore the company's Employees are required to:

- supply high quality products and services that meet the reasonable expectations of the customer and protect their safety and security;
- comply with the obligations and commitments assumed towards them;
- provide accurate, complete and truthful information;
- be consistent with advertising, commercial or any other kind of communications.

The employee or collaborator must not give or accept benefits in cash or in any other form, from or to any party, to promote or favour their own interests or those of HOTELMAN SINGER PALACE HOTEL SRL. Exceptions are made for gifts within ordinary courtesy relations or offered in case of specific events (holidays, conferences, etc.) in compliance with current company procedures.

The Company's priority objective is constituted by:

- satisfying the needs of Customers, whether they are public or private entities;
- establishing a long-lasting relationship of trust and collaboration with its Customers, inspired by honesty, correctness, transparency, professionalism, availability, respect and courtesy;
- ensuring the safety of the service provided to Customers, meaning the safety of the offered transport;
- ensuring the safety of the traveller during the journey.

The contracts stipulated with the Customers and any communication addressed to them are based on criteria of simplicity, clarity and completeness, avoiding the use of any deceptive and/or unfair practice.

### 7.3. Partners and Suppliers Relations

The Company defines its relations with its Partners based on compliance with the regulations in force and the principles of the following Code of Conduct, paying particular attention to the best professional standards, best practices in the field of ethics, health and safety protection and respect for the environment. Furthermore, collaboration between the Partners must be pursued in order to constantly ensure that the needs of the Company and its Customers are satisfied, both in terms of quality and delivery times.

All fees and/or sums paid to the Partners for any reason must be adequately documented, proportionate to the activity performed and in line with the conditions offered by the market.

It is not permitted to give or promise money or other benefits to representatives of Partner companies, so that the latter may perform or omit to perform acts in violation of their office obligations or loyalty obligations. Recipients dealing with Partners must act professionally and independently.

HOTELMAN SINGER PALACE HOTEL SRL undertakes to select its Suppliers and to qualify them according to their ability to satisfy company needs in qualitative and economic terms. To this end, the company prepares, through the periodic acquisition of documentation, methods for qualifying and monitoring its Suppliers regarding Quality, Environment & Safety and Social Responsibility, aimed at verifying their performance in these areas.

## 7.4. Public Administration Relations

HOTELMAN SINGER PALACE HOTEL SRL requires that the relevant corporate functions and/or third parties who represent the company have relations inspired by legality, transparency, correctness, confidentiality and effective collaboration with the Institutions and Public Administration.

HOTELMAN SINGER PALACE HOTEL SRL consequently prohibits any practice of corruption or collusive behaviour of any nature and in any form, that may promote or favour the conclusion of business for one's own benefit, that of the company or that of Public Administration Employees. In particular, it is prohibited to engage in any direct and/or indirect behaviour (as in through a third party) aimed at offering or promising money or other undue benefits (or having money or other undue benefits offered or promised) to a public official or a public service employee as remuneration for the exercise of their functions or powers, or to induce them to omit or delay an act of their office (or having an act of their office omitted or delayed), or to induce them perform an act contrary to their duties (or having an act contrary to their duties performed), even if the behaviour is carried out in the interest and/or to the advantage of the Company.

For the purposes of this code, Public Administration means Public Entities, public service concessionary Entities, natural or legal persons acting as a public official, public service officer, member of a European Community Body, European Community official or foreign state official, the judiciary, public supervisory authorities, etc.

In the context of relations with the Public Administration, it is necessary to take particular care not to carry out acts in violation of the legal provisions and of the following Code of Ethics. In particular, it is expressly forbidden to:

- mislead someone by using tricks or deception for the purpose of obtaining an unfair profit to the detriment of the State, another public body or the European Union. In particular, compliance with the law and correct commercial practice are recommended for negotiations, licences, requests for funding, contributions, subsidies and disbursements from the State or other entities belonging to the Public Administration;
- use or submit false declarations or documents or omit information required for obtaining funding, contributions, subsidised loans or other disbursements of the same type granted or provided by the state, other public bodies or the European Union;
- accept money or other benefits from a public official or public service officer in exchange for undue services. Whoever receives such requests must suspend all relations with them and inform the Supervisory Body in writing;
- offer or promise, even indirectly, money or other benefits with the purpose of omitting or delaying official duties or to perform acts contrary to the duties of a public official or public service officer.

Based on the aforementioned, it must be considered explicitly prohibited, by way of example, any behaviour directed and/or in any case aimed at:

- preparing documents or data (or having documents or data prepared) aimed at participating in tendering processes containing false information, in order to obtain the award of a tender to the Company or the disbursement of public funding;

- stipulating contracts (or having contracts stipulated) for the provision of services to the Public Administration following false statements relating to the existence of conditions and requirements necessary for performing the agreed activity;
- transmitting false statements to the public supervisory authorities or otherwise hinder their work;
- altering the Public Administration's IT registers to falsely indicate the existence of the requirements for participation in tenders or to produce documents certifying non-existent facts and circumstances or to modify data relating to the Company, even if already submitted to the administration;
- diverting, even partially, contributions, subsidies or funding obtained from the Public Administration;
- using or presenting statements or documents (written or oral) that are either false or attesting untrue facts, or any other materially and/or ideologically false documentation or omitting due information in order to obtain for oneself or for others (including the Company), without having the right to do so, contributions, funding, subsidized loans or other disbursements by the Public Administration;
- resorting to any type of deception ("artifice or trickery"), inducing someone into error, procuring for oneself or for others (including the Company) an unfair profit to the detriment of others in order to obtain contributions, funding, subsidized loans or other disbursements of the same nature, however named, granted or disbursed by the Public Administration;
- hindering the investigations carried out by the Judicial Authorities and/or favouring or damaging one of the parties in a criminal, civil and/or administrative proceeding.

## 8. SPECIFIC PRINCIPLES OF CONDUCT

### 8.1. Principles of conduct in corporate relations

It is prohibited to engage in any behaviour directed and/or, in any case, aimed at:

- exposing (or having exposed) in financial statements, reports or other corporate communications required by law, addressed to shareholders, the public or in the context of communications addressed to public supervisory authorities, material facts that do not correspond to the truth (even if subject to evaluation) on the economic, patrimonial or financial situation of the Company or omitting information on the same situation, the disclosure of which is required by law;
- producing (also in the capacity of or in collaboration with the auditors) false statements or concealing information concerning the economic, patrimonial or financial situation of the Company, in a manner suitable to mislead the recipients of communications on the aforementioned situation, in order to obtain an unfair profit for oneself or for others (including the Company);
- determining, with simulated or fraudulent acts, the majority during a shareholder meeting in order to obtain, for oneself or for others (including the Company), an unfair profit;

- concealing facts (or having facts concealed) relating to the economic, patrimonial or financial situation of the Company that should have been communicated to public supervisory authorities, with the aim of hindering the exercise of the latter's functions;
- carrying out operations of share capital reduction, mergers or demergers, in violation of the legal provisions and, in particular, of those aimed at protecting creditors.

## 8.2. Principles of conduct regarding the prevention of corruption between private individuals

Any behaviour directed and/or, in any case, aimed at giving, promising or offering money or other benefits in any case not due, also through a third party, to anyone who works for companies or private entities (so-called \"active\" corruption) is prohibited. At the same time, Recipients are prohibited from soliciting or receiving undue money or other benefits, or from accepting promises thereof, in exchange for the performance or issue of an act in violation of the obligations inherent in their office or the loyalty obligations (so-called \"passive\" corruption).

## 8.3. Principles of conduct to protect the domicile (including digital domicile)

It is prohibited to engage in any behaviour directed and/or, in any case, aimed at:

- illegally entering a computer or telematic system protected by security measures or remaining within the system against the express or tacit will of those who have the right to exclude third parties;
- obtaining, reproducing, disseminating, communicating or delivering codes, keywords or other means suitable for accessing a computer or telematic system protected by security measures, or in any case providing indications or instructions suitable for the aforementioned purpose towards, by way of example, Employees, Partners or competitors;
- obtaining, producing, reproducing, importing, disseminating, communicating, delivering or, in any case, providing others either equipment, devices or computer programs with the purpose of unlawfully damaging a computer or telecommunications system, the information, data or programs contained within it or pertinent to it or favouring the alteration or interruption, total or partial, of its functioning;
- intercepting communications relating to a computer or telematic system or occurring between multiple systems, or preventing, interrupting or disclosing to the public all or part of the content of such communications by any means of public information;
- installing equipment capable of intercepting, preventing or interrupting communications relating to a computer or telematic system or occurring between multiple systems;
- destroying, deteriorating, deleting, altering or suppressing corporate or third-party information, data or computer programs (including those used by or pertinent to the State or other public bodies or, in any case, of public utility);
- falsifying and deleting IT documents (also for probative value) present on their systems, for example relating to the amounts owed by the entity to the Public Administration in the case of computerized flows of payments between private entities and the Public Administration.

## 8.4. Principles of conduct for the protection of assets (anti-money laundering and self-laundering)

It is prohibited to engage in any behaviour directed and/or, in any case, aimed at:

- purchasing, receiving or concealing money or items deriving from any own or other's criminal activity, or in any case interfering in their purchase, receipt or concealment;
- replacing or transferring money, goods or other benefits deriving from any own or other's criminal activity, or carrying out other operations related to them, in order to hinder the identification of their criminal origin;
- using money, goods or other benefits deriving from any own or other's in economic or financial activities;
- conducting business relationships with individuals (natural or legal) whose membership in criminal organisations or in any case operating outside the law is of public knowledge, such as, by way of example but not limited to, people associated with the laundering and/or self-laundering environment, drug trafficking, usury.

## 9. USE OF COMPANY RESOURCES

Personnel are required to operate diligently to protect company assets, through responsible behaviour and in line with the procedures established to regulate their use, accurately documenting their usage. Recipients are responsible for all of the Company's assets and corporate resources placed under their custody, as well as for their protection against the risk of loss and/or damage.

In particular, each Recipient must:

- avoid private use of corporate assets;
- use the assets entrusted to them scrupulously and parsimoniously;
- avoid improper use of corporate assets that could cause damage or reduce efficiency, or in any case situations that conflict with the company's interests.

Each individual is responsible for protecting the resources entrusted to them and has the duty to promptly inform the relevant units of any threats or harmful events for the company.

Recipients are required to operate with the necessary diligence in order to protect the Company's corporate assets and resources, avoiding improper use that could cause damage and/or reduce their functionality or, in any case, avoiding use that is in contrast with the Company's interest.

Recipients are not permitted to use corporate assets and resources to carry out personal activities and/or activities unrelated to their duties, unless the Company itself explicitly and in writing authorises their promiscuous use.

## 10. ENVIRONMENTAL AWARENESS

The Company strives to respect the environment both in providing services to Customers and in carrying out all other business activities. In particular, each Recipient is required to do everything in their power to:

- actively improve the efficiency with which limited corporate assets and resources are used (for example, by recycling paper that has already been used, implementing a system of separate waste collection, correctly regulating heating and air conditioning systems, using low-energy consumption equipment, etc.);
- use products and/or services that offer environmental benefits;
- ensure the constant maintenance of corporate assets in order to also guarantee their energy efficiency;
- comply with the provisions established by management controls in order to minimise environmental impact.

It is prohibited to engage in any behaviour directed and/or, in any case, aimed at:

- causing air, soil, subsoil, surface water or underwater pollution;
- carrying out waste collection and storage activities or having waste collection and storage activities carried out, outside the cases permitted by law;
- regarding waste disposal, falsifying the prescribed documentation in whole or in part, materially or in content, or making use of forged documentation, as well as violating the obligations of communication and maintenance of mandatory registers and forms;
- releasing polluting or harmful substances into the atmosphere, in violation of the emission limit values or of the prescription established by authorisation, plans, programs, legislation or competent authority.

## 11. ACCOUNTING RECORDS AND PAYMENTS

All aspects ensuring a transparent accounting record (truthfulness, completeness, accuracy and clarity) represent a fundamental value for HOTELMAN SINGER PALACE HOTEL SRL, also with the purpose of showing shareholders and third parties a clear image of the company's economic, equity and financial situation. In order to respect this value, it is first of all necessary for the documentation of the elementary facts, to be reported in the accounts in support of the registration, to be complete, clear, truthful, accurate, valid, and kept on record for each transaction.

## 12. PRESENTS AND OTHER DONATIONS

In the course of business negotiations or business relations with the Public Administration and with Suppliers and Customers, the general criteria of fairness, transparency and integrity must be applied. In particular, they must not be:

- examined or proposals or promised employment opportunities that may benefit Civil Servants or Suppliers;
- offers, in any way, gifts, donations, indirect benefits, goods, services or favors not due or that go beyond the ordinary courtesy relations;
- solicited or obtained confidential information that could compromise the integrity or reputation of both parties, as well as bring direct or indirect benefits to HOTELMAN SINGER PALACE HOTEL SRL;

- take action to influence improperly the decisions of the other party.

In addition, Managers, Employees or collaborators of HOTELMAN SINGER PALACE HOTEL SRL must not accept any good or service, gift, benefit, performance that goes beyond the ordinary courtesy relations, by external or internal parties, in any case.

### **13. BUSINESS NEWS, INFORMATION AND DOCUMENTS**

In order to guarantee the right degree of protection of company information and data, all Employees and outsourced Partners must operate ensuring the maximum confidentiality of the information that is in their possession and will have the obligation to:

- not to disseminate or communicate personal data to third parties, except to the subjects and entities provided by HOTELMAN SINGER PALACE HOTEL SRL;
- not to deliver or duplicate personal data for purposes other than those of the assigned task;
- prevent personal data from being subject to risks of loss or destruction, including accidental destruction, or that unauthorised persons being able to access the data;
- comply with the company's security and confidentiality regulations; retain and control personal data by taking the necessary security measures;
- in case of processing of personal data that require the use of computer and telematic systems, manage your password according to the indications of the company in accordance with the provisions of EU Regulation 2016/679.

### **14. MEDIA AND NEWS ORGANIZATIONS**

All communications of HOTELMAN SINGER PALACE HOTEL SRL addressed to the outside, and disseminated through any means, must be truthful, clear, accurate. Relations with the media are reserved to the company functions specially appointed, or otherwise specially authorized.

It is forbidden for employees, collaborators and partners to give interviews (in any form) or statements to the press (also online and on social media) about the activities of HOTELMAN SINGER PALACE HOTEL SRL without having been previously authorized.

### **15. HUMAN-RESOURCE**

HOTELMAN SINGER PALACE HOTEL SRL recognizes the fundamental importance of human resources, which represent the beating heart of the company, ensuring its success and success. Therefore, the company is committed to combating all forms of discrimination against employees and ensuring equal opportunities.

The Company, in the employment relationship, enhances the skills, potential and commitment of employees and other workers, using objective evaluation criteria relating to professional qualifications and individual skills, offering equal opportunities for economic and professional growth.

The Company is committed to ensuring an adequate working environment in terms of the safety and health of employees..

In order to ensure maximum transparency in the operations of recruitment of Employees, the totality of the recruitment of staff (except in special cases of urgency) is carried out through internal selection procedures that include the acquisition of Curriculum, personal interviews and assessment of the adequacy of professional requirements. Staff are employed under a regular employment contract and no form of irregular work is tolerated. The Company selects, contracts, organizes and remunerates Employees on the basis of criteria of competence and merit, in compliance with a system based on criteria of objectivity and reasonableness.

The company requires that the same criteria of transparency and professionalism are also adopted by any Partner who uses their own staff for activities in partnership with HOTELMAN SINGER PALACE HOTEL SRL.

## 16. SAFETY AT WORK

The promotion of the safety culture is considered an essential value in order to promote responsible and conscious behaviour among workers, also with the contribution of a substantial internal training activity. The workers undertake to operate safely respecting the company's instructions and current legislation. To this aim, the Company:

- adopt appropriate occupational health and safety management procedures to avoid or reduce the risks;
- take into account the state of technological development and adapt prevention and control measures in a timely manner;
- programme the prevention of accidents at work, aiming at a system that integrates technology, work organization, social relations and the influence of factors in the working environment;
- inform, train and train Workers and Partners on all risks and on the use of protective, safety and health equipment;
- give appropriate instructions to workers;
- sets specific improvement targets aimed at minimising occupational accidents and diseases;
- supervises the correct fulfilment of accident prevention obligations by employees or partners.

In compliance with the above principles, the Recipients must:

- comply with current legislation, the provisions of the Authority as well as the procedures and instructions of the Company on occupational safety and health;
- always use the protective measures provided by the Company;
- maintaining a healthy and safe working environment;
- avoid and reduce the use of toxic and hazardous materials.

## 17. MONITORING THE IMPLEMENTATION OF THE CODE OF CONDUCT

The task of verifying the implementation and application of the Code of Ethics is the task of:



- President of board of directors;
- Supervisory Board: this Board, in particular, in addition to monitoring compliance with the Code of Conduct, suggests appropriate updates of the Code, also on the basis of reports received by staff.

The Supervisory Board has the following tasks:

- Communicate to the governing body, for the taking of appropriate measures, the reports received on violations of the Code of Conduct;
- Express binding opinions on the revision of policies and procedures in order to ensure consistency with the Code of Conduct;
- Contribute to the periodic revision of the Code of Ethics: to this end, the ODV formulates the appropriate proposals to the board of directors that will evaluate and, if necessary, approve and formalize them.

The Supervisory Board retains the requirements of autonomy and independence, assumes powers of investigation and control and powers of initiative for the performance of the assigned functions.

All Recipients of the Organizational Model are required to promptly report to the Supervisory Board any violation or suspicion of violation of the Organizational Model, the Code of Conduct and, more generally, any illegal conduct relevant to D. Lgs. 231/2001 of which they became aware. The reports may be made through the appropriate communication channels specifically provided by the Company and by the same Supervisory Board. In relation to reports of violations of the Organisational Model or the Code of Conduct or illegal conduct, the Company shall ensure that:

- the confidentiality of the identity of the reporting agent is always guaranteed, without prejudice to legal obligations;
- acts of retaliation or discrimination against the alerter are not adopted;
- appropriate penalties are imposed on those who infringe the reporting agent's protection measures;
- no disciplinary sanction of dismissal, change of job or any other retaliatory or discriminatory measure is taken against the signaller.

## 18. DISSEMINATION OF THE CODE

HOTELMAN SINGER PALACE HOTEL SRL undertakes to disseminate, verify and monitor this Code to all recipients, and to apply any sanctions in case of non-compliance with the provisions contained therein. Published on the website and posted on the business bulletin board and signed viewing sheet.

In any business relationship, all parties must be informed of the existence and content of this Code of Conduct, which they are required to respect.