



LA LUCENTEZZA_{srl}
IMPRESA DI PULIZIA E SERVIZI INTEGRATI

CODE OF ETHICS

LA LUCENTEZZA S.R.L.

Approved by resolution of the Board of Directors on 16 July 2021

1. Introduction

1.1 Purpose and scope

LA LUCENTEZZA S.R.L. has adopted and disseminated this Code of Ethics with the aim of communicating to the members of the board of directors, managers, employees and contractors the set of values and rules of conduct to which the Company adheres in the conduct of its business.

The Company recognizes that the establishment and promotion of corporate values cannot be separated from effective adherence to the fundamental principles of fairness, professionalism, personal integrity and the protection of health in the workplace, as well as fair competition in the market by all those operating within it.

In this context, the Code of Ethics therefore reaffirms the Company's rules and guiding principles, through which it aims to strengthen the climate of trust and positive collaboration with all those who, in various capacities, are involved in the shared development and promotion of corporate values.

This Code of Ethics sets out the Company's express commitment to aligning its organisational system with the principles set out in Legislative Decree 231/2001, fully aware of its ethical and social responsibilities towards its managers, employees, contractors and, more generally, the community in which it operates.

LA LUCENTEZZA S.R.L. is also committed to implementing and promoting socially responsible behaviour within its organisation and throughout its sphere of influence.

1.2 Compliance with external and internal regulations

The Code of Ethics incorporates the requirements set out in the regulatory provisions applicable to the Company's activities. Any conduct that deviates from these requirements could result in the Company incurring civil and/or criminal and/or administrative liability, with the consequent imposition of sanctions against it.

It is therefore the duty of all those who, in whatever capacity, work for and/or collaborate with the Company to strictly adhere to the provisions of the Code of Ethics and to those of all applicable laws and regulations. Compliance with the Code of Ethics is, in fact, to be considered an integral part of the contractual obligations undertaken by the members of the board of directors, managers, employees and collaborators of LA LUCENTEZZA S.R.L. pursuant to Article 2104 of the Italian Civil Code. Any breach of the rules and principles set out in this document may therefore constitute a serious breach of the obligations arising from the contract and/or from the mandate conferred in any way, and may give rise to a tortious act, with all consequent liability.

The Company reserves the right to protect its interests in any competent forum, including against third-party collaborators (suppliers, agents and consultants) who have breached the provisions of the Code of Ethics applicable to them.

All personnel employed by the Company, at every hierarchical and functional level, including third parties, are therefore required to scrupulously observe the rules and standards of conduct set out in this document.

In conclusion, the Code of Ethics, if properly understood, implemented and updated, constitutes the Company's primary and most important legal safeguard.

2. Objectives

The Code of Ethics sets out the set of ethical and moral values and principles that must guide the conduct of the Company's representatives and employees, as well as the ways in which the Company intends to pursue its mission whilst complying with its legal and social obligations.

All conduct must be guided by the ethical principles of legality and transparency, in line with the Company's values, guiding principles and procedures, and must be driven by the aim of not exposing the Company to regulatory and reputational risks.

LA LUCENTEZZA S.R.L is committed to complying with current legislation in the various areas in which it operates, and with principles relating to the protection of human rights, labour standards, and the fight against corruption and organised crime.

In this regard, any conduct of a criminal nature, carried out in the course of or by virtue of one's duties, shall be regarded and treated as a direct breach of this Code of Ethics.

3. Intended Audience

The principles and provisions of this Code of Ethics are binding on members of the board of directors, senior managers, and employees, as well as any interns and contractors. The same requirements also apply to parties with whom the Company comes into contact by virtue of supply and/or consultancy agreements, regardless of the nature of the legal relationship established (e.g. external collaborators as a whole, including consultants, business *partners*, customers and suppliers).

The above-mentioned parties are hereinafter collectively referred to as 'Recipients'. The Code of Ethics is brought to their attention in the manner set out in the following section.

4. Methods of implementation

This document was approved by the board of directors by resolution dated 16 July 2021.

The Code of Ethics and any subsequent updates thereto will be brought to the attention of the Recipients and the public using the following means:

- distribution in paper and/or electronic format (e.g. email);
- publication on the Company's website;
- dedicated training sessions.

In any event, the management of LA LUCENTEZZA S.R.L has already distributed this version of the Code of Ethics and is committed to promoting compliance with it.

In particular, each Recipient is required to:

- refrain from conduct contrary to the Code of Ethics, complying with *the* company's regulatory *framework*;
- ensure that their colleagues fully comply with the Code of Ethics;
- disseminate this document to third parties with whom they come into contact in the course of or by virtue of their duties;
- report any breach of the Code of Ethics using the appropriate tools made available by the Company;
- bear in mind that any conduct contrary to the letter and spirit of the Code of Ethics will be sanctioned in accordance with the provisions of the Disciplinary System;
- attend the training courses provided by the Company with a view to developing, over time, amongst other things, the ability to recognise, analyse and resolve any doubts that may arise in day-to-day business operations.

5. General Principles

5.1 Legality

All Recipients of this Code are required not only to comply with the principles and requirements set out below, but also to observe applicable national and EU legislation.

The Company condemns any unlawful conduct, which cannot under any circumstances be justified by the aim of achieving its economic objectives.

Under no circumstances, in fact, may the pursuit of the Recipients' personal interests – even where these coincide, in whole or in part, with the Company's interests – justify conduct that is dishonest and/or non-compliant with the rules of conduct laid down by law and/or the Code of Ethics.

5.2 Loyalty

All activities, both internal and external, must be characterized by the utmost loyalty and integrity, and all Recipients must act with a sense of responsibility, in good faith and by establishing proper professional and commercial relationships, in accordance with applicable regulatory requirements and industry *best practice*.

5.3 Transparency and completeness of information

All actions and relations with *stakeholders*, as well as those between Recipients and third parties, must be conducted in a manner that ensures the fairness, completeness, accuracy, consistency and timeliness of information, so as to enable those concerned to make independent and informed decisions.

5.4 Impartiality

The Company undertakes to avoid, in both internal and external relations, any form of discrimination based on age, gender, sexual orientation, health status, race, nationality, political or trade union views, or religious beliefs.

5.5 Confidentiality

The Company, in compliance with *data protection* legislation (GDPR – EU *General Data Protection* Regulation 2016/679), ensures the utmost confidentiality in the handling of information collected and/or processed in the course of or in connection with its business activities, and refrains from collecting confidential data that is not strictly necessary. In any event, it does not collect or use sensitive data without the prior, express and informed consent of the data subject.

Confidentiality is a principle that the Company safeguards through its employees and contractors, who are required not to use and/or disclose confidential information to unauthorised parties for purposes unrelated to the conduct of the Company's business, except where such information is requested by a judicial authority, provided that this is done in accordance with the procedures and conditions laid down by law.

Confidential information includes, by way of example only, personal details and any information regarding pending civil, criminal or administrative proceedings, etc.

The computerised processing of data is subject to appropriate security controls to safeguard the Company against unauthorised access or unlawful use.

5.6 Quality

The Company bases its activities on the satisfaction and protection of its customers, listening to requests that may help improve the quality of the services provided.

5.7 Unfair competition

The Company considers it essential to promote fair competition, which it regards as being in its own best interests as well as in those of all operators in the sector, customers and *stakeholders* in general. To this end, LA LUCENTEZZA S.R.L. is committed to upholding the principles of fair competition by refraining from collusive or predatory behaviour and from abusing a dominant position.

5.8 Relations with the Public Administration

In its dealings with the Public Administration, the Company guarantees the utmost loyalty, transparency, integrity and fairness.

Relations with institutional counterparts are conducted exclusively through the company representatives designated for this purpose and always in such a way as to allow the details to be reconstructed even after some time has elapsed.

Should the Company engage the services of a consultant or third party in its dealings with the Public Administration, such parties shall be required to comply with the same rules as those applicable to the Recipients.

In any event, the Company will not be represented by people who are in a situation of conflict of interest, even if only potential.

5.9. Protection of personal rights

The Company recognises the need to protect individual and personal freedom and rejects any act that encourages discriminatory attitudes or behaviour or behaviour that is harmful to the individual.

Furthermore, the Company condemns the propagation of ideas based on racial or ethnic superiority or hatred, or the instigation or incitement to commit acts of discrimination on racial, ethnic or religious grounds.

5.10 Transparency in accounting and commercial relations

Accounting transparency is based on the truth, accuracy and completeness of the information and data recorded in the accounts. Each Recipient is required to cooperate to ensure that management events are correctly and promptly reflected in the accounts.

For every transaction or consultancy engagement, adequate supporting documentation of the work carried out must be retained on file. Each entry must accurately reflect the information contained in the documentation.

Before establishing relationships or entering into contracts with business *partners*, consultants or suppliers, Recipients are required to verify the identity and reputation of the other party.

5.11 Conflict of interest

Recipients must avoid carrying out, or facilitating, transactions that give rise to a conflict of interest – whether actual or potential – with the Company, as well as activities that may interfere with their ability to make impartial decisions in the best interests of the Company and in full compliance with the Code of Ethics.

Should they find themselves in a situation of conflict of interest, even if only potential, the Recipients must report this circumstance to their line manager and/or the relevant supervisory bodies, and must refrain from carrying out any transaction.

More generally, in their dealings with third parties, the Recipients must act fairly and transparently, and are expressly prohibited from engaging in unlawful favoritism, collusive practices or soliciting personal advantages for themselves or others.

5.12 Rejection of criminal organizations

The Company rejects any form of involvement in organizations whose purpose is to commit one or more criminal offences, and shall refrain from promoting their establishment and/or from facilitating or reinforcing their aims.

To this end, it undertakes not to enter into any working or commercial relationship with parties, whether natural or legal persons, involved in acts of terrorism or organised crime.

5.13 Cooperation in the event of investigations

Recognising the value of full cooperation with judicial and administrative authorities, LA LUCENTEZZA S.R.L. prohibits any behaviour aimed at obstructing investigations or inquiries and, in particular, any conduct intended to interfere with the search for the truth, including by inducing persons with knowledge of the facts not to make statements or to make false statements.

5.14 Proper use of IT systems

The Company undertakes to use IT and/or telecommunications services in accordance with current legislation. To this end, it adopts appropriate measures to ensure that access to telecommunications and IT data is restricted to people expressly authorised to do so, preventing unauthorised access and exercising constant oversight over the professionalism and integrity of IT service providers.

The Company undertakes not to use, for private interests or purposes, IT assets or equipment, or any other information made available to it for business reasons.

5.15 Relations with private individuals and rejection of corruption

The Company considers it a fundamental and indispensable principle that relations with private individuals (suppliers, competitors, customers, consultants, business *partners*, etc.) should be characterised by the utmost loyalty, integrity, fairness and good faith.

5.16 Transparency and accuracy of information relating to the Company's economic, equity and financial position

All employees and/or collaborators who, in any capacity (including as mere providers of data), are involved in the preparation of the financial statements or of documents which in any way represent – or contribute to representing – the Company's economic, equity or financial position, as well as, in particular, the board of directors, the statutory auditors and anyone holding senior positions, are prohibited from presenting facts that are untrue, even if subject to assessment, or to omit information or conceal data in direct or indirect breach of regulatory principles and internal procedural rules, in such a way as to mislead the recipients.

5.17 Health and Safety at Work

The Company is committed to safeguarding health and safety in the workplace in full compliance with Consolidated Law No. 81/2008, promoting and ensuring the health and safety of its employees and of all those who access its offices and workplaces.

The Company is also committed to ensuring working conditions that respect individual dignity and safe and healthy working environments, including through the promotion of a culture of safety and risk awareness, and by encouraging responsible behavior from everyone in accordance with company procedures and current health and safety legislation.

The Company is also committed to:

- foster and consolidate a culture of safety, by raising awareness of risks and promoting responsible behaviour;

- seek out the best safety standards available and applicable to the Company's activities, based on established scientific and technological knowledge;
- implement preventive measures aimed at ensuring the health and safety of workers;
- promote training programs designed to empower all company staff in matters of health and safety at work;
- to involve and raise awareness amongst all members of the organisation, at all levels, in the management of issues relating to health and safety at work;
- ensure that correct operating procedures, current safety regulations and management directives are understood, applied and maintained at all levels of the organisation, in the knowledge that proper training and information for workers is a fundamental tool for improving company performance and safety at work.

Employees must take care of their own health and safety and that of other people present in the workplace who may be affected by their actions or omissions, in accordance with the training, instructions and resources provided by the Employer.

5.18 Environmental protection

In carrying out its business activities, the company gives the highest priority to environmental protection, whilst also pursuing a policy of sustainable development with a view to reducing – in compliance with legislation and best business practices – the impact of its activities on the environment and on the community in which it operates.

LA LUCENTEZZA S.R.L. operates in a sector where respect for and attention to environmental protection are of greater significance than in other business contexts. Indeed, certain activities involve the use of detergents, solvents and/or disinfectants that are potentially harmful to the environment. Aware of its role and responsibilities, the Company takes all appropriate precautions to protect the environment, as well as the health of its workers.

To this end, when procuring assets necessary for the conduct of its business and when designing its services, the Company prioritizes the selection of products, tools, equipment, techniques and methods that are guided by criteria of eco-compatibility and environmental sustainability.

In particular, the Company promotes initiatives aimed at responsible procurement, energy efficiency, separate waste collection, recycling and the proper disposal of waste, paying particular attention to the selection of service providers involved in waste management.

5.19 Anti-Money Laundering

LA LUCENTEZZA S.R.L. requires the utmost transparency in commercial transactions and in dealings with group companies and third parties, in full compliance with national and international regulations on combating money laundering.

All financial transactions, including those with other group companies, must be adequately justified by contractual arrangements and carried out using payment methods that ensure their traceability.

The Recipients, within the context of the various relationships established with the Company, undertake to combat activities related to the laundering of money derived from criminal activities or the handling of goods or other benefits of illicit origin.

5.20 Combating tax fraud

The Company ensures compliance with current tax regulations. LA LUCENTEZZA S.R.L. undertakes to fulfil its tax obligations within the time limits and in the manner prescribed by legislation or by the competent tax authority.

Furthermore, LA LUCENTEZZA S.R.L. undertakes to present the acts, facts and transactions undertaken in such a way as to ensure that the forms of taxation applied are consistent with the actual economic substance of the transactions.

6. Specific principles of conduct

The individual and collective conduct of the Recipients, when carrying out any transaction, must be in full compliance with applicable laws and the ethical values of LA LUCENTEZZA S.R.L.

The Code of Ethics sets out below the principles of conduct to which the Company adheres and which form an integral part of a more comprehensive system of operational and behavioural rules that the Recipients are obliged to follow.

6.1 Relations with customers

The Company bases the excellence of the services it offers on its focus on customers and its willingness to meet their requests. The aim is to ensure an immediate, professional and competent response to customers' needs, conducting itself with fairness, courtesy and cooperation.

6.2 Relations with suppliers

The Company is committed to selecting its suppliers on the basis of objective assessments of their expertise, competitiveness, quality and price, with a view to pursuing a procurement policy aimed at achieving the greatest competitive advantage whilst ensuring a level playing field for all suppliers.

The Company develops relationships with its suppliers based on fairness and transparency.

6.3 Relations with employees

In its relations with staff, the Company undertakes to:

- carefully assess the appropriateness of engaging external staff, selecting highly qualified candidates;
- establish efficient, transparent and collaborative relationships;
- secure the cooperation of contractors in ensuring a favorable balance between the quality and cost of the service;
- insist on the application of the terms set out in the contract;
- require contractors to adhere to the principles set out in this document, by including specific provisions to this effect in the relevant contracts or letters of engagement (e.g. express termination clauses);
- operate within the framework of current legislation and require strict compliance with it.

6.4 Relations with public officials or people entrusted with public service duties

The Company conducts itself with the utmost loyalty, fairness and integrity in its dealings with employees and representatives of public bodies, political parties and trade unions, supervisory authorities and the judiciary. In particular, it is not permitted to offer money or other benefits to managers, officials or employees of the public administration or to their relatives.

6.5 Human resources management

The Company bases its policies on the recruitment, remuneration and training of employees on criteria of professionalism, competence and merit. The Company rejects any form of discrimination or favoritism aimed at facilitating recruitment or the allocation of roles.

Similarly, members of the board of directors, statutory auditors, employees and contractors must act and conduct themselves impartially, avoiding any unequal treatment and striving to maintain an environment that respects individual dignity and personality.

The Company safeguards equal opportunities in the recruitment of staff by using objective assessments of candidates' professional and psychological-aptitude profiles.

7. Implementing Rules and Final Provisions

The effectiveness of the internal control system is a prerequisite for conducting business in accordance with the rules and principles of this Code of Ethics. All those to whom the Code of Ethics applies are therefore required to ensure its effective operation.

To this end, the Company undertakes to adopt specific procedures, instructions and/or regulations designed to ensure compliance with this document, whilst also establishing the criteria for the appointment of members of the Supervisory Body *pursuant to* Article 6(b) of Legislative Decree 231/2001.