

ARLETTI & PARTNERS

CODE OF CONDUCT

Table of contents

Foreword

1. Ethics, transparency, fairness, professionalism
2. Relations with customers and external collaborators
3. A&P's employees, partner, & collaborators
4. Harassment or mobbing in the workplace
5. Abuse of alcohol or drugs and no smoking
6. System of internal control
7. Transparency of accounting records
8. Health, safety and environment
9. Confidentiality and protection of data

Obligation to the Code

Contractual value of the Code

Foreword

The Code is brought to the attention of every person or body having business relations with A&P

Compliance with the law, regulations, statutory provisions, self-regulatory codes, ethical integrity and fairness, is a constant commitment and duty of A&P and characterizes the conduct of the entire organization.

A&P's business activities are carried out in a transparent, honest, fair way and in good faith.

All A&P's employees and partners, without any distinction or exception whatsoever, respect the principles and contents of the Code in their actions and behaviors while performing their functions and according to their responsibilities, because compliance with the Code is fundamental for the quality of their working and professional performance. Relationships among A&P's staff, at all levels, must be characterized by honesty, fairness, cooperation, loyalty and mutual respect.

1. Ethics, transparency, fairness, professionalism

Any action performed and, generally, the conduct of A&P's employees and partners in the performance of their duties is inspired by the highest principles of fairness, completeness and transparency of information and legitimacy, both in form and substance, as well as clarity and truthfulness of all accounting documents, in compliance with the applicable laws in force and internal regulations.

All A&P's activities have to be performed with the utmost care and professional skill, with the duty to provide skills and expertise adequate to the tasks assigned, and to act in a way capable to protect A&P's image and reputation.

All requests for personal advantages/benefits for oneself or others or clients, either directly or through third parties, are prohibited without any exception.

It is prohibited to pay or offer, directly or indirectly, money and material benefits and other advantages of any kind to third parties, whether representatives of governments, public officers and public servants or private employees, in order to influence or remunerate the actions of their office.

Commercial courtesy, such as small gifts or forms of hospitality, is only allowed when its value is small and it does not compromise the integrity and reputation of either party, and cannot be construed by an impartial observer as aimed at obtaining undue advantages. In any case, these expenses must always be authorized by the designated managers as per existing internal rules, and be accompanied by appropriate documentation.

A&P's employees, as well as external collaborators whose actions may somehow be referred to A&P, must have behaviors towards the Public

Administration and Offices characterized by fairness, transparency and traceability. These relations have to be exclusively dealt with by the departments and individuals specifically appointed to do so, in compliance with approved job plans and duties.

It is forbidden to make, induce or encourage false statements to Authorities.

2. Relations with customers and external collaborators

Business policies are aimed at ensuring the quality of our services.

Therefore, A&P's staff shall:

- comply with in-house procedures concerning the management of relations with clients
- supply, with efficiency and courtesy, within the limits set by the contractual conditions, high-quality performances meeting the reasonable expectations and needs of clients
- supply accurate and exhaustive information on services and work process, be truthful in any kind of communication, so that client are always duly advised and take informed decisions.

A&P undertakes to look for external collaborators with suitable professionalism and committed to sharing the principles and contents of the Code and promotes the establishment of long-lasting relations for the progressive improvement of performances while protecting and promoting the principles and contents of the Code.

A&P secures the cooperation with reliable collaborators with the sole intention to guarantee the continuous satisfaction of clients in terms of quality, costs and responsiveness.

Strict controls are carried out over the performances provided by external collaborators in order to avoid any serious problem with possible negative consequences for A&P and its clients.

3. A&P's employees, partners and collaborators

People are basic components in the company's life. The dedication and professionalism of management and employees represent fundamental values and conditions for achieving company's objectives and fulfill its mission.

A&P is committed to developing the abilities and skills of management and employees so that their energy and talent can have full expression for the fulfilment of their potential in their working performance.

Undue pressure or discomfort is not allowed, while appropriate working conditions promoting development of personality and professionalism are fostered.

A&P undertakes to offer, in full compliance with applicable legal and contractual provisions, equal opportunities to all its employees, making sure that each of them receives a fair statutory and wage treatment exclusively based on merit and expertise, without discrimination of any kind.

4. Harassment or mobbing in the workplace

A&P supports any initiatives aimed at implementing working methods for the achievement of a better organization.

A&P demands that there shall be no harassment or mobbing behaviours in personal working relationships either inside or outside the company. Such behaviours are all forbidden, without exceptions, and are:

- unjustified interference in the work performed by others;

- the creation of an intimidating, hostile, isolating or in any case discriminatory environment for individual employees or groups of employees;
- the placing of obstacles in the way of the work prospects and expectations of others merely for reasons of personal competitiveness or because of other employees. Any form of violence or harassment, either sexual harassment or harassment based on personal and cultural diversity, is forbidden. Such harassment is for instance:
 - proposing private interpersonal relations despite the recipient's explicit or reasonably clear distaste;
 - alluding to disabilities and physical or psychic impairment, or to forms of cultural, religious or sexual diversity.
 - obtaining sexual attentions using the influence of one's role
 - subordinating decisions on someone's working life to the acceptance of sexual attentions, or personal and cultural diversity;

5. Abuse of alcohol or drugs and no smoking

All A&P employees shall personally contribute to promoting and maintaining a climate of common respect in the workplace; particular attention is paid to respect of the feelings of others.

It is forbidden to:

- hold, consume, offer or give for whatever reason, drugs or substances with similar effect, at work and in the workplace;
- smoke in the workplace

A&P will therefore consider individuals who work under the effect of alcohol or drugs, or substances with similar effect, during the performance of their work activities and in the workplace, as being aware of the risk they cause. Chronic addiction to such substances, when it affects work performance, shall be considered similar to the above mentioned events in terms of contractual consequences.

6. System of internal control

A&P undertakes to promote and maintain an adequate system of internal control, i.e. all the necessary or useful tools for addressing, managing and checking activities in the company, aimed at ensuring compliance with internal procedures and efficiently managing activities

The responsibility is shared by all staff members and anyone at A&P, according to their functions and responsibilities, shall define and actively participate in the correct functioning of the system of internal control.

A&P promotes the dissemination, at every level of its organization, of policies and procedures characterized by awareness of the existence of controls and by an informed and voluntary

control oriented mentality; consequently, A&P's management in the first place and all A&P's staff in any case shall contribute to and participate in A&P's system of internal control and, with a positive attitude, involve its collaborators in this respect.

Each employee shall be held responsible for the company tangible and intangible assets relevant to his/her job. No employee can make, or let others make, improper use of assets and equipment belonging to A&P.

Any practices and attitudes linked to the perpetration or to the participation in the perpetration of illegal behaviors are forbidden without any exception.

A&P internal audit responsible has full access to all data, documents and information necessary to perform the relevant activities.

7. Transparency of accounting records

Accounting transparency is grounded on the use of true, accurate and complete information which form the basis for the entries in the books of accounts.

For each transaction, the proper supporting evidence has to be maintained in order to allow:

- easy and punctual accounting entries;
- identification of different levels of responsibility, as well as of task distribution
- accurate representation of the transaction so as to avoid the probability of any material interpretative error.

Each record shall reflect exactly what is shown by the supporting evidence.

A&P staff who become aware of any omission or negligence in accounting or in the documents on which accounting is based, shall bring the facts to the attention of the accounting administration.

8. Health, safety and environment

A&P's staff shall, within their areas of responsibility, actively participate in the environmental, safety and health protection for themselves, their colleagues and third parties.

9. Confidentiality and protection of data

Protection of business secret

A&P's activities, especially on the immigration consultancy, constantly require the acquisition, storing, processing, communication and dissemination of information, documents and other data regarding contracts, notes, personal data, pictures, etc.) that may not be disclosed to any person who is not directly involved in the service delivery or administration.

A&P's staff and partners shall ensure the confidentiality required by the circumstances for each piece of news they have got to know of because of their working function.

Any information, knowledge and data acquired or processed during one's work or because of one's tasks at A&P, may not be used, communicated or disclosed without specific authorization in compliance with specific procedures.

Protection of privacy

A&P is committed to protecting information concerning its staff, partners and third parties, whether generated or obtained inside A&P or in the conduct of A&P's business, and to avoiding improper use of any such information.

A&P intends to guarantee that processing of personal data within its structures respects fundamental rights and freedoms, as well as the dignity of the parties concerned, as contemplated by the legal provisions in force.

Personal data must be processed in a lawful and fair way and, in any case, the data collected and stored is only that which is necessary for

certain, explicit and lawful purposes. Data shall be stored for a period of time no longer than necessary for the purposes of collection.

A&P undertakes moreover to adopt suitable preventive safety measures for all databases storing and keeping personal data, in order to avoid any risks of destruction and losses or of unauthorized access or unallowed processing.

A&P's staff shall:

- obtain and process only data that are necessary and adequate to the aims of their work and responsibilities;
- obtain and process such data only within specified procedures, and store said data in a way that prevents unauthorized parties from having access to it;
- represent and order data in a way ensuring that any party with access authorization may easily get an outline thereof which is as accurate, exhausting and truthful as possible;
- disclose such data pursuant to specific procedures or subject to the express authorization by the responsible in charge of this and, in any case, only after having checked that such data may be disclosed, also making reference to absolute or relative constraints concerning third parties bound to A&P by a relation of whatever nature and, if applicable, after having obtained their consent.

Obligation to know the Code

Each of A&P employees and partners is expected to know the principles and contents of the Code as well as the reference procedures governing own functions and responsibilities and refrain from all conduct contrary to such principles, contents and procedures

Contractual value of the Code

Respect of the Code's rules is an essential part of the contractual obligations of all A&P's staff and partners pursuant to and in accordance with applicable law. Any violation of the Code's principles and contents may be considered as a violation of primary obligations under labour relations or of the rules of discipline and can entail the consequences provided for by law, including termination of the work contract and compensation for damages arising out of any violation.