

Code of conduct

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B&P

Barabino & Partners

Consulenza in Comunicazione d'Impresa



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Our mission

We are an Italian, independent and international Group.

Competent and reliable, we partner with Italian and international businesses who believe in communication as a strategic choice.

We bring passion and experience to our clients and help them share their values, ideas, brands, products and services. We do this in an innovative and unexpected way, both in Italy and worldwide.

We are aware that in today's increasingly connected and ever-evolving markets, companies have to face new challenges and keep changing: for this reason, **we constantly invest in new technologies and in people, our most valuable resource.**

We are proud to be Italian and to have established the Barabino&Partners brand abroad, with the aim of supporting Italy's entrepreneurs internationally.

We pursue one single objective: **communicating the world of our clients.**

Our values

Energy and passion

Talent development

Openness to change

Client engagement

Independence

Ethic and responsibility

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Our values

An ethical approach to entrepreneurial activity and professional rigour represent the fundamental landmarks of the Barabino & Partners Charter of Values.

Due to the specific nature of the activities that constitute Barabino&Partner's core activities – communications consultancy and the development of valuable relationships on behalf of the clients – credibility, transparency, decency, authority and a good reputation are at the heart of the Company's mission.

It is an approach that deeply influences the success of the company, as well as fulfilling some of the social duties owed by businesses.

Barabino & Partners code of conduct

The code of conduct is a document written and circulated throughout the Company whose aim is to define the general ethos of the company and provide a coherent and common code of conduct for both the Company and the individuals within it.

Who must adhere to the code of conduct

- the Company, as a legal, institutional and commercial subject
- Employees, in their professional capacity and also in their private lives, as “representatives” of the Company's values
- Suppliers and external partners, who are asked to adhere to the Company's ethical choices in order to guarantee coherence throughout the business relationship



General Principles

The General Principles set out the ethical choices that underlie all the Company's activities, as well as acting as a reference point for any occasions not detailed in the Code of Conduct.

Everybody who must adhere to the Code of Conduct must also apply the General Principles to their role within the Company.

Professional Commitment

- always offer the appropriate resources and individual skills on Clients projects
- always maintain a professional relationship with the client and the teams you work with, and respect the privacy rules regarding sensitive information

Legality | be aware of and follow national and international laws and rules concerning professional activity and, more generally, ensure you behave in a way that respects these laws unflinchingly

Honesty | pursue efficient competition strategies, but ensure behaviour towards competitors is always fair and proper

Decency | behaviours and expressions, both literal and vernacular ones, that may be deemed offensive and represent a sort of prejudice and discriminate gender, sexual orientation, race, religious belief, political opinion and social condition are not tolerated and must be avoided at all costs. In every relationship, whether client or personal, behave in a way that is respectful of individual needs and of the social context in which the Company operates

Confidentiality | be highly sensitive to issues surrounding confidentiality and the sharing of information in regards to both the Company and the clients

Transparency | provide the Stakeholders with accurate information in order to consolidate professional relations based on a collaborative relationship. Avoid (or readily declare) any situation that could lead to a conflict of interests with the Company and its Clients

Health, security and environment preservation | act considerately, bearing in mind the health and safety of others and try and protect the environment. Act in a way that reduces risk of work related injury and where possible, look after the environment.

Stakeholders' relationships

As well as following the General Principles, the Code of Conduct details specific rules of behaviour to apply to all the different Stakeholders.

Clients

Client satisfaction is a priority for Barabino & Partners.

The Company and its employees are committed to:

- > developing long-term relationships, better described as partnerships, based around a deep understanding of the needs of each client
- > undoubtedly making their skills and resources available to any client
- > proposing a commercial offer in line with the quality and quality of services given, taking into account the specific demands of the client, without creating unjustified differences and privileges between different customers
- > upholding the commitments undertaken in the contract in efficiently and with maximum professionalism



Management and circulation of client information

The proper management and circulation of client information constitute one of the main competency areas of Barabino & Partners, upon which the credibility and reputation of the Company relies.

With this in mind, the Company promotes the observance of precise rules of behavior which must be upheld by every stakeholder (employees, external partners, associates, suppliers, etc.).

Barabino & Partners, ensuring the application and processing of personal data with respect to the privacy law (GDPR), commits to avoid the dissemination of client information outside the scope of the workplace and in any circumstance not authorized by the client themselves.

Both throughout and after the termination of the contract, if for whatever reason the relationship should end, Barabino & Partners will keep strict professional confidentiality in relation to sensitive information, news and data about the client's activities and the content of the contract between the two parties.

Online and offline Media

Professional relationships

General Behaviour

A positive and proper relationship with the media forms the basis of our work, and it is as a result of these positive relationships that we are able to offer a high quality service to our clients.

Any stakeholder who has contact with the media must:

- > always consider transparency, decency, trust and professional collaboration as the bases of the relationships built with journalists and sector employees
- > never spread information which is either completely or partially false, unverified or that comes from unreliable sources
- > avoid giving misleading information which could be wrongly interpreted
- > particularly in reference to financial communication, comply with the current legislation in terms of communication settled by the market regulation authorities
- > in general: apply the relationship models explained in the General Principles

Barabino & Partners is committed to working on behalf of their clients as professionally and rapidly as possible, with extensive market knowledge, to a high technical level and, always, with the most integrity and diligence.

In regards to press relationships, Barabino & Partners' role is to give truthful information despite representing the views of a certain party. Information must be transmitted as correctly and efficiently as possible, leaving to the press the ultimate choice of publication of the full or partial subject, and thereby the choice of whether to modify or integrate the content.

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The nature of Barabino & Partners' activities excludes any guarantee or assurance regarding the achievement of specific goals or results, unless as part of a formal agreement with the client. In other words, Barabino & Partners' obligations concern means, not results.

Communication on digital media (website-email-blog-social network)

The use of digital communication tools and interactive platform usage (blogs, social networks...) is considered a means of communication with the media.

Therefore, professional services involving these tools must follow the rules stated in the following sections:

- General Principles
- Clients Relationships – Management and circulation of clients' information
- Media – General Behavior

Considering the specific nature of digital media, the following rules of behavior must also be applied:

- always declare openly and directly the identity of the source (Barabino & Partners on behalf of the client)
- treat new operators (e.g. bloggers) who work on the web with the same importance as you would journalists of traditional media
- adjust style and communication according to the medium used, following the rules of "Netiquette", sure to always respect people, cultural and individual differences

Adhering to these rules is particularly important when one takes into consideration the peer-to-peer nature of online communication. This, unlike traditional media, means it is possible to have a direct relationship with customers, retail investors

and, generally speaking, with the customers of the companies to whom Barabino & Partners offers its consultancy services.

The rules and principles which must be followed regarding the management and circulation of client information when working with media must be considered binding also in reference to Barabino & Partners company communication.

Personal use of digital media

Interactive web platforms (blogs, social networks)

The use of interactive platforms for personal reasons during work hours are to be avoided.

One must bear in mind the professional role carried out and the visibility of individual Barabino & Partners consultants. If using the web for personal reasons, it is paramount to behave in such a way that guarantees the preservation of the Company's and the consultants' image and reputation.

In any circumstance, any opinion expressed on the internet at a personal level must be considered the opinion of the individual, not the Company.

Below are the rules for employees to follow when using social networks during work hours:

- 1.** Publish responsibly
- 2.** Write accurate content
- 3.** Protect the reputation of B&P and its clients
- 4.** Maintain professional confidentiality
- 5.** Respect all B&P values at all costs



Employees and associates

Barabino & Partners considers its employees and associates as the fundamental resource with which to achieve business success.

Skill, commitment, motivation and involvement represent an added value which cannot be overlooked.

For this reason, in addition to the General Principles directives, Barabino & Partners develops specific policies to get the most out of its human resources:

- > by guaranteeing equal opportunities, in both the initial recruitment and promotions stages, through selection based exclusively on professional qualities and individual capabilities
- > by paying a salary appropriate to the role and by issuing contracts and assuring treatment that is fully in line with legal requirements, the labour code and the collective contracts within the sector that the Company adheres to
- > by organising training programmes
- > assuring the respect of personal dignity and forbidding any form of harassment or intimidation in the working environment
- > nurturing individual growth, specific qualities and internal collaboration yet maintaining a team mentality
- > providing for the employees a work environment which guarantees respect for health and safety, with strict application of the relevant regulations

Employees are, however, obliged to:

- > correctly apply the General Principles during the working day
- > maintain positive and collaborative relationships with colleagues and any other Stakeholder, based on decency and courtesy

- > offer the Company and its clients their best efforts and professional capabilities, actively participating in the Company's life
- > be committed to developing new skills

Suppliers

Barabino & Partners selects its suppliers based on the objective evaluation of what they offer in terms of quality, price, services, and relevance to the Company's needs.

It is forbidden to select a supplier on the basis of the benefit of personal relationships, for nepotism or favoritism or for any advantages which are not directly related to the firm.

Barabino & Partners asks its suppliers to agree to the Code of Conduct for what concerns the role and the functions they carry out in the within of the activities of the Company in full compliance with the Ex DLGS 231/01 organizational model.

Competitors

Barabino & Partners bases its entrepreneurial model on the principles of fair competition and open markets:

- > it asks its employees to observe the rules set nationally and at a European level that guarantee fair competition
- > It forbids direct or indirectly illegal activities such as:
 - industry espionage
 - the use of illegal instruments in order to acquire confidential information
 - employment of competitors' workers in order to gain advantages or damage the other party
 - in general, any other activity that is considered morally wrong

Barabino & Partners aims to gain an advantage within the industry based exclusively on its own merit; entrepreneurial growth, innovation and the delivery of quality products and services.

Shareholders, market, institutions

Barabino & Partners governance is inspired by transparency, correctness, competence and efficiency:

- it fulfils its obligation to the shareholders with the greatest commitment, assuring that their interests are safe and that economic value is achieved while always respecting current regulations
- it puts in place adequate controls and management systems to analyse and reduce risks
- it provides constant and complete communication within the Company regarding financial developments, by providing financial reports and balance sheets that have been compiled with caution, precision and zeal. It also provides for the safekeeping of financial documents in accordance with terms and conditions set by the Law
- it is committed to obeying financial and fiscal laws, along with contingent rules set by the Control Committee



Environment preservation

Barabino & Partners considers environmental responsibility a priority and promotes behaviour and initiatives that can reduce the Company's environmental impact, particularly within the office and relating to travel.

All employees must adopt these responsibilities and adapt their conduct during working hours.

Employees must abide by the Company rules regarding the environment which aim to reduce CO2 emissions by:

- > rationing and reducing electricity use
- > reducing raw material use (paper, water etc.)
- > buying products with a low environmental impact
- > abiding by recycling laws



Specific Rules

International Activity

Barabino & Partners increases its international activity by means of the offices present in the main cities of the major different markets.

The Company, and in particular the employees and partners who are employed in the overseas offices must:

- know and abide by the laws of the country that involve professional activities
- abide by, also on a personal level, the laws of the hosting country
- be respectful of local culture and traditions in terms of both professional and personal relationships
- know and respect the dynamics of the foreign market, with specific attention to the practice of fair competition as stipulated by the Company's supervision committee and by the regulations of the market.

Use of Company's tools and property

Employees and Partners are required to correctly use the Company's goods and tools during work activities.

IT tools

The use of the Company's IT networks is subject to specific regulation due to the influence it has on the quality of products and services offered, confidentiality, and the image and reputation of the firm.

In particular:

- all data and information contained in the Barabino & Partners digital databases, mailboxes included, belong to the Company and must be used for Company activity following specific limits and directions
- taking the above into consideration and bearing in mind the need to protect each individual's privacy, it is forbidden to use the Company's IT tools to store or share personal content and details or content that are not related to the Company's activity
- it is paramount, while using IT tools, to always consider the laws and rules concerning information protection

Web Use

The use of web resources for personal reasons is generally discouraged and it is completely prohibited to visit any sites:

- against moral and decency
- containing illegal content or content that incites illegal behaviour
- inciting violence, hate or discriminatory behaviour

It is furthermore not permitted to:

- acquire products online aimed for personal use (e-commerce websites)
- download or upload files for personal use



Company cars

Barabino & Partners employees who use a personal vehicle for work purposes must:

- > abide by traffic regulations in Italy as well as abroad
- > by their own means, pay fines of any traffic violations on time
- > by the Company's means, conduct routine vehicle maintenance and inspection of the vehicle to ensure it is always in a fully functioning state
- > avoid long trips if he/she has not had the proper rest, as to not jeopardize their safety

Health and safety

All Barabino & Partners employees and partners must respect health and safety policies in the workplace.

These rules are to be heeded by the employees and partners themselves, their colleagues and any third parties present in the workplace:

These rules include:

- > the total prohibition of alcohol abuse or drugs use
- > the prohibition of smoking within the office (other than spaces indicated) or wherever it can harm other people or damage company property (fire prevention)

Gifts and benefits

- It is forbidden to accept gifts (from suppliers or other people) with a higher monetary value than the one that is considered acceptable by normal commercial or courtesy transactions (a reference value can be set at €50) or that is aimed at obtaining favours involving Barabino & Partners activities
- It is therefore forbidden also to use gifts or benefits to acquire any kind of advantage by a third party in the interest of the Company

Conflict of interests

Situations that might, even potentially, represent a conflict of interests between the company and the individual should be avoided (or immediately raised).

It is not permitted:

- to use Company goods for personal reasons
- to have, directly or indirectly, interests or shares in companies which are competitors, clients or suppliers

Dress Code

Every employee (and external associates when involved in an activity with Barabino & Partners) are required to be dressed in a way that is in line with their role and function in the Company. A smart dress code contributes to the building of a positive and authoritative image and is a sign of respect toward clients, colleagues and anyone who has a professional relationship with the firm.



Supervision Committee and reporting breaches of the Code

Barabino & Partners has a Supervision Committee (GVQ) whose aim is to implement the Code of Conduct and to whom violations must be reported. Its duties are:

- to examine possible violations of the Code, and then carry out the relevant investigations
- to intervene on possible Code violations which have not been adequately addressed
- to communicate to the same Committee the results of the investigations and then consider any punitive measures.

All the employees can report a breach of the Code of Conduct in writing, in consideration of privacy policies.

Violations must at first be notified to the direct superior. In their absence, or in the case that they are the subject of the violation, notifications can be handed over directly to the Supervision Committee (GVQ).

This edition of the Code of Conduct is in effect for the Holding Company and for all its subsidiaries and it will remain so unless any future modifications and updates are implemented.

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