

# THE ETHICAL AND SOCIAL RESPONSIBILITIES OF THE GATTINONI GROUP





## Define according to the following principles:

#### Principle of impartiality

In carrying out its business, the GATTINONI GROUP - without prejudice to the rights of properties functional to business development - refrains from creating advantages or disadvantages arbitrary towards employees, suppliers, institutions and public administrations local and national.

The GATTINONI GROUP will favor relationships with subjects who declare ethical values to their own.

### **Principle of Honesty**

The Directors, Managers and all employees of the GATTINONI GROUP guide the own work towards a sense of responsibility and honesty, abstaining from convincing personal gain or corporate to the detriment of compliance with current laws and the provisions of the Code of Ethics.

## **Principle of Sobriety**

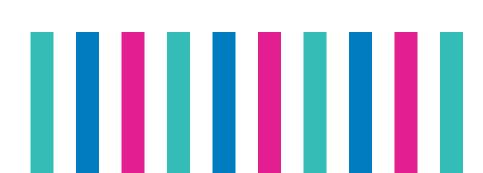
The GATTINONI GROUP is committed to using all resources - material and immaterial - inspired by maximum sobriety, both to avoid the waste of company resources and to consistency with the principles of ecological respect.

## **Principle of Legal Compliance and Transparency**

The GATTINONI GROUP respects applicable laws, regulations and regulatory standards to its activities in all respects: stopovers, work, environmental and safety.

It ensures transparent, complete and understandable information so that everyone can make autonomous and informed decisions and verify the coherence between objectives declared and results achieved. Likewise, all those who contribute to the pursuit of the mission of the GATTINONI GROUP are called to adopt behaviors inspired by transparency.







### **Principle of Confidentiality**

The GATTINONI GROUP ensures compliance with the principle of confidentiality of information in own possession regarding properties, group companies, employees, suppliers and customers. Any information may be provided only and exclusively in full compliance of the law or on the basis of specific agreements between the parties.

Likewise, partners, managers and employees are required to respect confidentiality of the information that is part of the company's assets.

## **Principle of Fair Competition**

The GATTINONI GROUP shapes its behavior in relations with competing companies to principles of loyalty and correctness, abstaining from collusive behavior, in belief that fair and fair competition improves the functioning of the market and produces benefits for customers.

### **Principle of Integrity**

The GATTINONI GROUP is committed to working to protect and enhance the people who, a various capacities, contribute to the pursuit of its mission, protecting its dignity and physical and moral integrity.

## Principle of Correctness and Completeness in the formulation of contracts

The GATTINONI GROUP bases the formulation of any contract on the principles of transparency, completeness and correctness, trying to foresee, as far as possible, the various contingencies which could affect relationships if unexpected events arise.

Should a renegotiation of the contract become necessary, the GATTINONI GROUP will not exploit, to its advantage, any situations of information weakness of the own interlocutors.

## **Principle of Social Responsibility**

The GATTINONI GROUP pays attention to the local communities in which it operates and is committed to contribute positively to their social and environmental well-being. Promotes sustainable and environmentally friendly business practices, reducing all the environmental impact of the activities is minimal.







## RULES OF CONDUCT

## Rules of conduct towards the owners and members

Those who exercise management functions in the GATTINONI GROUP act exclusively by pursuing the direct and indirect benefit of the organization and members, refraining from exploit to their advantage the information superiority that they institutionally possess. To ensure maximum transparency, criteria are established in the GATTINONI GROUP and yes they define regulations that allow broad information on the activities of the administrators and managers.

In compliance with the principle of confidentiality, the GATTINONI GROUP guarantees that any information in its possession will be managed and used in full compliance with the rights ofpeople and the law.

## Rules of conduct towards customers

The GATTINONI GROUP nalizes its business to customer demand and orients it own organization towards continuous performance improvement.

The GATTINONI GROUP undertakes to work in the constant search for the best service to customers, respecting the ethics of fair earnings, committing to listening and responding to the needs of its customers. In compliance with the principle of transparency and regulations contained in the Consumer Code, the GATTINONI GROUP undertakes to inform the customer in a complete and timely manner on the characteristics and prices of the services, through non-misleading, correct and respectful messages and communications.

In compliance with the principle of confidentiality, the GATTINONI GROUP guarantees that any information in its possession about Customers will be managed and used in full compliance with rights of people and the law.







## Rules of conduct towards employees

In compliance with the principle of impartiality, the GATTINONI GROUP adopts criteria for selection and career advancement of employees such as to exclude discrimination or favoritism.

The GATTINONI GROUP is committed to the training and development of its employees through the preparation of update programs that increase its specifications professionalism and which tend to maintain them over time.

The GATTINONI GROUP undertakes to ensure that employees receive, upon hiring, the most complete and transparent information on corporate identity and contracts that regulate the employment relationship.

In compliance with the principle of centrality of the person, the GATTINONI GROUP is committed to adopt strategies that favor the development of employment, both direct and induced, e to safeguard safety and health in the workplace.

The GATTINONI GROUP undertakes to enforce the provisions of the Codes of Conduct against mobbing and sexual harassment.

The GATTINONI GROUP ensures that its employees avoid situations where they can conflicts arise between personal interests, of an economic or professional nature, it is that of the company.

## Rules of conduct towards suppliers

The GATTINONI GROUP is committed to seeking partnership relationships with its suppliers, in order to achieve the best satisfaction of customer demand and needs. The GATTINONI GROUP selects its suppliers on the basis of objective criteria, ensuring fair treatment to all those who participate in the negotiations.

The GATTINONI GROUP asks its service providers to fully comply with the regulations at work, human rights, environmental protection.

Based on the principle of impartiality, the group companies, directors and managers will not offer or accept gifts in excess of normal courtesy practices, or that they may appear to be aimed at obtaining favorable conditions and treatments.

In general, the company undertakes to respect the rules of conduct adopted by it in reference to D.L. 231/2001.







During the definition of the Contracts, the GATTINONI GROUP and its suppliers provide all the information that puts both subjects in a position to perform the commitments undertaken correctly, avoiding any misunderstanding. In compliance with the principle of confidentiality, the GATTINONI GROUP undertakes not to transmit external information on suppliers that is confidential and strategic in nature, and asks for reciprocity of behavior.

## **Rules of conduct towards the Public Administration**

The GATTINONI GROUP interacts with the Public Administration regarding legislative, regulatory and fiscal obligations, respecting the procedures and rules of behavior adopted by it in reference to D.L. 231/2001.

In compliance with the principle of autonomy, the GATTINONI GROUP acts in coherence with its identity and undertakes to make decisions and commitments solely on the basis to the interests of members and customers.

In relations with public administrators and public administration officials, the GATTINONI GROUP is committed to respecting the principle of honesty.

This means the rejection of any illicit agreement, as well as pressure to exchange benefit or utility aimed at obtaining favorable decisions, according to a specific policy anti-corruption adopted.

## **Group mission**

## Transparency and reliability.

We are credible partners with a long history of success; animated by a profound spirit of collaboration, we build stable and lasting relationships that go beyond the results of business.

## Sustainable growth.

Our corporate philosophy is based on precise values, work ethic and respect for all internal and external corporate stakeholders. Dedication that fuels our daily actions.







#### Continuous innovation.

At the heart of the operating model is the constant development of processes, skills and platforms technologies, to continue to establish leadership in our key sectors (Events, Business Travel and Leisure).

#### Customer satisfaction.

Competence, passion and attention to detail guide us in the search for excellence, to provide services designed on the needs of our customers, with the aim of maximizing their satisfaction and delization.

#### The place to be.

We are committed to making our company an increasingly better and inclusive place. A reality that enhances the unique and distinctive talent and potential of each collaborator.



