



ONWARD TO THE NEXT LEVEL

CODE OF ETHICS



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CODE OF ETHICS OF THE MCO GROUP

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1 INTRODUCTION

MCO is a company that organizes fairs and congresses, provides services, manages areas and structures dedicated to it and related activities, develops a set of relationships (internally and externally) responsibly adopting a set of behaviors aimed at generating value for the company and for the social and economic context of reference. This document, called the **Code of Ethics** (hereinafter also the "**Code**"), is an official document and was drawn up in order to define and express the fundamental values and ethical responsibilities that Group Companies (hereinafter, also "Company") expressly take on all interlocutors with whom they interact on a daily basis. For the Group, principles such as legality, fair competition, honesty, moral integrity, transparency, reliability and a sense of responsibility represent behaviors that contribute to the affirmation of the Companies and that characterize them by establishing their behavior in both internal relations that in external relations. The set of these principles must inspire all those who work for any reason for the Companies and in no case will any conduct held in violation of these principles be justified, even if pursued with the intention of acting for the good of the same or of the Group. The implementation of the principles of this **Code** is therefore aimed at increasing and protecting the identity and efficiency of the Group, ensuring that its "modus operandi" also constitutes a real asset to be affirmed and enhanced as a specific and recognized competitive advantage. The **Code**, formally adopted by the administrative bodies of each Company, is also intended to introduce and make binding to the Companies the principles and rules of conduct relevant to the reasonable prevention of the offenses indicated in the *Legislative Decree 8 June 2001. 231* on the administrative liability of legal persons dependent on a crime.

2 INTRODUCTION AND VALUES OF THE GROUP

The MCO Group is a global center of attraction for the organization of health events. It organizes events, fairs, conferences and events that make MCO the center of an articulated network of commercial relations. The Group's mission is to "be a leading and innovative group in the management of exhibition districts, in the organization of trade fairs, in the development and marketing of services for the trade fair and congress world, promoting Florence as a global platform for international trade".

The reference values of the Group are the following:

- being a customer's partner for their development; therefore be effective for the growth of businesses, economic and productive sectors, presence on international markets and the territory, sharing risks and opportunities;
- being development professionals; therefore share common growth objectives, develop new and diversified skills, empower each person on the Group's consolidation and development project;
- being oriented towards the future; thus supporting development and anticipating the transformation of the markets, seizing the new intersections between demand and supply; Respect the individual; Commitment to the environment, to innovation, to society.

3. SCOPE OF APPLICATION OF THE CODE AND RECIPIENTS

This Code is addressed to the corporate bodies and their members, employees, employees, even temporary, consultants and collaborators in any capacity, attorneys and any other person who may act in the name and on behalf of each Group Company (hereinafter also "Addressees of this Code"). They are also "Addressees of this Code", with reference to relations with Group Companies, suppliers, customers and anyone with commercial or financial relationships with these Companies. The Code of Ethics identifies general principles of behavior that must be respected during the performance of the activities and establishes guidelines to follow in relations with colleagues and in relations with customers, suppliers and partners, with other companies, with public bodies and institutions, with political and trade union organizations and with the media. In particular, the top management of the Companies of the Group will take responsibility for the actual implementation of the Code and its dissemination within and outside the Companies. The essential requirement of any relationship of profitable collaboration with the Group is represented by the respect, by the collaborators and other third parties (including the commercial and financial partners of the Companies of the Group), of the principles and provisions contained in this Code. In this sense, at the time of entering into contracts or agreements with collaborators or other third parties, the Companies equip their interlocutors with this Code or an extract from the same.

4. ADVERTISING

The code is shared within the Company by publication on the company web page. The new managers and members of the corporate bodies are given a paper copy. Directions for finding a copy of the Code of Ethics are provided to new hires and collaborators as well as consultants and suppliers.

5. GENERAL PRINCIPLES. DUTIES AND RESPONSIBILITIES

MCO intends to develop the value of competition by operating on principles of fairness. Fair competition and transparency towards all the operators present on the market. Subjects required to comply with the code operate with impartiality and neutrality in all proceedings and take decisions with rigor, transparency and in compliance with the law.

5.1 Relationships with partners, collaborators, customers and suppliers

Relationships and behaviors, at all company levels, must be functional and solely related to the interests of the company, as well as based on principles of honesty, loyalty, responsibility, confidentiality, transparency, correctness, efficiency, collaboration, spirit of service, impartiality, and mutual respect. In this context, particular attention is paid to information on the existence of situations of conflict of interest and their prevention.

Personnel, without prejudice to what is stated in the contractual rules on the subject, must not assume external positions in companies or commercial companies whose interests are directly or even potentially conflicting or interfering with those of MCO.

All the stakeholders of the Group Companies (directors, employees, consultants, shareholders, customers, suppliers, commercial and financial partners, trade associations, trade union representatives, and, in any case, anyone who has relationships with Group Companies, etc.) they operate in full compliance with the laws and regulations in force in the territory in which they carry out their activities, as well as in compliance with this **Code of Ethics** and internal procedures. The Companies of the Group will not start or continue relations with those who do not intend to comply with this principle. In the same way, the Company and those acting inside and / or externally on its behalf are required to comply with all the provisions adopted by the

competent Authorities against the Company (including any provisions that apply sanctions or disqualifying precautionary measures). The stakeholders of the Companies of the Group and, in particular, the employees must always be aware of the laws and / or regulations in force and the consequent correct and legitimate conduct.

5.2 Relations with the Public Administration and the Judicial Authority, Relations with the Public Supervisory Authorities

Relations with the Public Administration and with the Judicial Authority are inspired by the principles of correctness, impartiality, transparency and independence and are the exclusive responsibility of the competent corporate functions and the persons formally appointed to do so. When any business negotiation, request or relationship with the Public Administration or the Judicial Authority is in progress, the personnel in charge must not try to improperly influence the decisions of the counterpart, including those of the officials who deal or make decisions, on behalf of of the Public Administration. In negotiations, requests or institutional relations with the Italian or foreign Public Administration or Judicial Authorities, payments or compensation, in any form, offered, promised or performed directly or through third parties to Public officials or employees is absolutely prohibited. Administration or their relatives (both Italian and other countries) aimed at inducing the performance of an official act or contrary to official duties by a public official or a person in charge of a public service to be performed for the benefit of a or more Group companies. Furthermore, it is forbidden to undertake (directly or indirectly) the following actions:

- examine or propose employment and / or commercial opportunities that may benefit employees of the Public Administration on a personal basis;

- offer or in any way provide gifts and / or gifts;
- solicit or obtain confidential information that could compromise the integrity or reputation of both parties.

These provisions cannot be circumvented through indirect forms of illegal contributions. If a Director, an employee, a collaborator or an external consultant of one of the Companies of the Group receives explicit or implicit requests for advantages (patrimonial or non-patrimonial) coming from Public Administration or in any case from subjects acting on their behalf, he must immediately inform their direct supervisor and / or the Supervisory Body to carry out the necessary checks and safeguards.

The Recipients of this **Code** undertake to scrupulously observe the provisions issued by the competent Institutions or Public Supervisory Authorities for compliance with the legislation in force in the sectors connected to the respective areas of activity. The Recipients of this **Code** also undertake that, within the scope of the preliminary investigations with Public Institutions and / or Supervisory Authorities, no requests or requests will be presented which contain untruthful declarations in order to obtain public disbursements, contributions or subsidized loans, or unduly obtain concessions, authorizations, licenses or other administrative documents. The Recipients of this **Code** undertake to comply with any request coming from the aforementioned Institutions or Authorities as part of their respective supervisory functions, providing - where required - full cooperation and avoiding obstructionist behavior.

5.3 Relations with Political Forces and Associations with interests

Without prejudice to the prerogatives provided for by the law and contract regulations in force, everyone is made aware that any involvement in political or trade union activities takes place on a personal basis, and in compliance with the laws. The Group has relations with trade associations, trade unions, environmental organizations and

similar associations, with the aim of developing its activities, establishing forms of cooperation of mutual benefit and presenting its positions. The presentation of specific positions of the Group with political forces and / or associations must take place with the consent of the top management or the relevant functions.

6. METHOD OF APPLICATION

6.1 Dissemination and training

Each Group Company undertakes to disseminate this **Code** as well as any variation and revision with adequate and appropriate means, bringing the same to the attention of all internal and external subjects interested in the corporate mission, including through specific training activities.

To this end, the Companies of the Group adopt an adequate program for the dissemination of the **Code**, addressed to all internal and external subjects involved in the corporate activity in order to sensitize them on issues concerning the ethically oriented management of the social activity. Furthermore, the **Code** is brought to the attention of other stakeholders through specific communication activities. Furthermore, the Companies of the Group adopt a periodic information / training program aimed at all the Recipients of the **Code** relating to the updating of the **Code** and, in any case, to any modifications and / or additions that may be made to it following organizational changes. of the Company, of interventions deriving from the supervisory activity carried out by the SB or any legislative changes. Training initiatives are differentiated according to the role and responsibility of employees or collaborators.

6.2 Supervisory Body

For the purposes of a correct interpretation and application of this **Code of Ethics** and of the related implementation and disciplinary procedures, each Group Company has established, pursuant to and for the purposes of *Legislative Decree no. 231/01*, a specific Supervisory Body. The Supervisory Body is in charge of controlling the functioning, the application of the Organization and Management Model and its periodic updating. It also supervises compliance with the **Code of Ethics** by the Recipients of the same. The Supervisory Body maintains the requirements of autonomy and independence,

assumes powers of investigation and control as well as powers of initiative for the performance of the functions assigned.

In this context, the Supervisory Body:

- promotes consistency between the principles of the **Code of Ethics** and company policies, also in relation to the obligations pursuant to *Legislative Decree 231/2001*;
- contributes to defining the various initiatives to promote knowledge and adequate training on the contents of the **Code of Ethics**;
- can carry out checks on compliance with the **Code of Ethics** by the recipients of the same, acquiring all the necessary information and documentation, referring in this sense to the Board of Directors;
- receives any reports on non-compliance with the **Code** and, if necessary, initiates the related preliminary investigations;
- establishes appropriate procedures in the assessment of violations in order to:
 - a) *guarantee the necessary confidentiality*
 - b) *define the necessary safeguards for the interested parties*
 - c) *adopt their own provisions in a maximum time period of 90 days from when they become aware of any reports*
 - d) *inform the interested parties of any procedures against them, allowing them to send written memos or participate in hearings.*

Any communication addressed to it can be made to the following e-mail address:

avvreginaeroietti@gmail.com

The Supervisory Body prepares an annual report to the Board of Directors on the activity carried out. The Supervisory Body, in turn, can be heard at any time by the Board of Directors and other corporate bodies to report on particular events or situations relating to the functioning and compliance with the **Code of Ethics**.

6.3 Violations and penalties

In the event of violations of the **Code of Ethics**, each Group Company adopts disciplinary measures against the persons responsible for the violations, where deemed necessary for the protection of corporate interests, and compatibly with the provisions of the current regulatory framework and employment contracts, that can come up to the expulsion from the Company of the same managers, in addition to the compensation for any damages deriving from the same violations. These disciplinary measures are undertaken in compliance with the provisions of the Disciplinary System adopted by each Group Company also pursuant to *Legislative Decree 231/2001*. Failure to comply with the rules of the **Code of Ethics** by members of the corporate bodies may result in the adoption, by the competent corporate bodies, of the most suitable measures provided for and permitted by law. Violations of the rules of the **Code** by employees constitute a breach of the obligations arising from the employment relationship, with any contractual and legal consequence, also with reference to the relevance of the same as a disciplinary offense. Violations committed by suppliers and external collaborators will be sanctioned in accordance with the provisions of the related contractual duties, except for more relevant violations of the law.

7 VALUE OF PEOPLE. PROTECTION OF SAFETY AND HEALTH

Human resources represent the fundamental assets of the Group. The professionalism and dedication of employees are necessary elements for the existence, development and achievement of its objectives. All Group companies are required to comply with current legislation protecting working conditions and, in particular, with the provisions of *Legislative Decree no. 81/2008* ("*Implementation of article 1 of the law 3 August 2007, n. 123, concerning the protection of health and safety in the workplace*"). The Companies of the Group guarantee an adequate working environment from the point of view of the safety and health of the employees, adopting the necessary measures required by current legislation, all of them are committed, each in the areas of their competence, to respecting the preventive and safety measures put in place Protection and environmental sensitivity The Group Companies, aware of of the value constituted by the environment in which they operate, they are required, in compliance with the applicable legislation with reference to the specific activities carried out, to adopt measures aimed at respecting the environment Quality Quality is a distinctive element of the Companies of the Group. expected by its interlocutors and the Group companies claim it from themselves.

8. CONTRIBUTIONS AND SPONSORSHIPS

Il Gruppo è disponibile a fornire contributi e sponsorizzazioni, nel rispetto delle procedure definite, dandone adeguata pubblicità, per sostenere iniziative proposte da enti pubblici e privati e da associazioni senza fini di lucro, regolarmente costituite ai sensi di legge e che promuovano i valori cui si ispira il presente Codice. Le sponsorizzazioni possono riguardare eventi ed iniziative a carattere sociale, culturale sportivo e artistico; esse possono essere finalizzate anche alla realizzazione di studi, ricerche, convegni e seminari aventi ad oggetto tematiche di interesse per il Gruppo. Organi di informazione e altre organizzazioni

Le informazioni e le comunicazioni indirizzate agli organi di informazione devono essere corrette, chiare, veritiere, ferme restando le esigenze di riservatezza richieste dalla conduzione delle attività. In particolare gli amministratori e i dipendenti della società devono rigorosamente rispettare i doveri di riservatezza imposti dalle loro funzioni non divulgando fatti e notizie relativi all'attività della società. La partecipazione, in nome o in rappresentanza delle Società (da parte di componenti di funzioni aziendali preposte ai rapporti con gli organi di informazione) ad eventi, a comitati ed associazioni o Enti di qualsiasi tipo, siano esse scientifiche, culturali o di categoria, deve avvenire nel rispetto degli interessi e dell'immagine del Gruppo.

9. CONFIDENTIALITY AND PRIVACY PROTECTION

MCO pays particular attention to the implementation of the provisions on the protection and protection of personal data pursuant to *Legislative Decree 196/2003* and *European Regulation no. 679/2016*

A data processor has been appointed

The company has adopted a privacy organizational model kept at the headquarters All employees are authorized to process MCO customer data

The external collaborators (accountant, labor consultant, competent doctor and IT company) have been specifically appointed sub-managers for data processing

An external DPO has been appointed to monitor and assist MCO in the application of the privacy legislation and can be contacted at the email elisatysserand@tiscali.it

The employees, in turn, have authorized the company to process their personal and sensitive data.

Even in the case of online registration at the conferences, MCO has provided for the compilation of a particular format that allows the explicit release of consent to processing by colors that want to register

10. FINAL PROVISIONS

10.1 Conflict with the Code

In the event that even one of the provisions of this Code should conflict with provisions set forth in internal regulations or procedures, the Code will prevail over any of these provisions.

10.2 Changes to the Code

Any changes and / or additions to this Code must be made in the same manner adopted for its initial approval.

11. ANNEXES

Information flows to the Supervisory Body

Direct communications to the Supervisory Body can be sent in the following ways:

- postal dispatch at the registered office of MCO International Group Srl, P.I. 06598810486, with registered office in Florence, via Luigi Carlo Farini, 11, in the person of its legal representative.

FORM FOR THE SUBMISSION OF REPORTS OR REQUESTS

MCO International Group Srl, P.I. 06598810486, with registered office in Florence, via Luigi Carlo Farini, 11, in the person of its legal representative

Reporting data:

Surname and name

Address:

Telephone number. e-mail

Supplier/Other (.....) []

collaborator/employee []

SIGNALS

The report concerns:

(write X in the square next to the indicated argument)

Report []

Request for clarification []

other.....

Describe here what happened and why you believe what happened in contrast with the contents of the Code of Ethics or the request for clarification or otherwise:

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Possible attachments:

date..... signature

