

## **CODE OF ETHICS PORDENONE FIERE S.p.A.**

### **Foreword**

Pordenone Fiere S.p.A. deals with the accomplishment of exhibition events with the aim of promoting the meeting between supply and demand and to allow the presentation, promotion and marketing of goods and services.

Pordenone Fiere S.p.A. deals also with the organization of conferences, congresses, exhibitions, cultural events entertainment and leisure activities.

The mission of Pordenone Fiere S.p.A. is to foster the development of local and national manufacturing and commercial activities, through the provision of exhibition and congress services.

In the pursuit of its activities Pordenone Fiere S.p.A. intends to observe, in addition to the laws and regulations in force, also the requirements set forth in this Code of Ethics.

### **1 General Principles**

The Code of Ethics of Pordenone Fiere S.p.A. has the goal of defining a set of rules, which must be followed by all those working in the name and on behalf of the company. The following people are all required to comply with what is established:

- Representatives of the corporate bodies and managers
- Employees
- External collaborators, who must be appropriately informed of the rules of conduct contained in this Code

#### a) Ethical principles

The fundamental principles that Pordenone Fiere S.p.A. recognizes as a basis for its activities and to which all the subjects involved must refer are:

- Legality

Pordenone Fiere S.p.A. acts in compliance with the laws, its Code of Ethics and internal procedures

- Fairness

Pordenone Fiere S.p.A. in relations with its customers, suppliers and collaborators, avoids any form of discrimination based on gender, race, class, national origin, language, religion, political and philosophical opinions, membership of associations political or trade union, on health conditions, on age except for what is foreseen by the normative in force.

- Honesty

In carrying out any activity the employees of Pordenone Fiere S.p.A. and external collaborators are required to apply the laws in force, the Code of Ethics and internal regulations. In any case, the pursuit of interest or any advantage for Pordenone Fiere S.p.A. can justify an act that does not comply with the laws in force, the Code of Ethics, internal regulations and, in general, a non-honest conduct

- Integrity

In the context of any activity, the subjects involved must not result, or even appear, to be in a conflict of interest

- Relations with control bodies

Relations with control bodies are based on the principles of transparency, completeness, truthfulness and correctness of information. The information that, according to the law in force, must be communicated to the control bodies can not be concealed or distorted.

- Confidentiality

Pordenone Fiere S.p.A. guarantees the confidentiality of the information in its possession and refrains from searching for confidential data, except after an express and informed authorization in accordance with current legal regulations. Employees and collaborators are required not to use confidential information for purposes not related to the exercise of their job duties

- Protection of safety and health

Pordenone Fiere S.p.A. fully apply in its activities the provisions of Legislative Decree 81/2008 and subsequent amendments, and guarantees to its employees and collaborators an adequate working environment in terms of safety and health by taking all the necessary measures required by current legislation.

- Money Laundering

Neither Pordenone Fiere S.p.A. nor their employees will, in any way and under any circumstances, be involved in events related to money laundering from illegal or criminal activities. Before establishing relationships or entering into contracts with suppliers, one must ascertain the moral integrity and reputation of the other party  
Pordenone Fiere S.p.A. undertakes to comply with all national and international rules and regulations regarding anti-money laundering.

- Relations with public institutions

Relations with the Public Administration are based on maximum transparency and correctness. Pordenone Fiere S.p.A. maintains the necessary relationships, respecting respective roles and functions in a spirit of maximum collaboration with the Administrations of the State, the Regions and other local authorities

Anyone operating for Pordenone Fiere S.p.A. can not offer, directly or through third parties, sums of money or other benefits to public officials or to public service employees. These provisions cannot be circumvented by resorting to forms of contribution which, under the guise of sponsorships, appointments, consultancy or advertising have, in fact, the same purposes that are illegal and prohibited. Acts of courtesy, gifts and hospitality to public officials or persons in charge of public service must always be previously authorized according to the specific company procedures; they may be permitted, provided they are of modest value and such as to be considered customary provided that this does not however put at stake the integrity and reputation of Pordenone Fiere S.p.A. and does not influence the autonomy of judgment of the recipient; they must be communicated to the Supervisory Body provided for by the Organization Model; in the same way employees and collaborators can not receive gifts or other benefits except within the limits of normal courtesy relations and only if of modest value.

- Relations with private institutions and companies

Pordenone Fiere S.p.A. with its activities promotes the development of the sectors of activity involved and represented. In conducting economic relations with private institutions and companies, representatives of the corporate bodies, employees and collaborators must act according to the principle of professional correctness, efficiency and effectiveness. The evaluation of suppliers must also include the evaluation of the quality and price of the various goods and services offered on the base of criteria of efficiency and effectiveness.

## **2 Principles of conduct with other interlocutors**

- Relations with political parties, trade unions and associations

Pordenone Fiere S.p.A. it does not carry any form of undue pressure, direct or indirect, on political or trade union representatives, even through its employees or collaborators. Administrators and employees alike cannot engage in political activity during working hours or use the company's assets or equipment for this purpose; they must also clarify that any political opinions expressed by them to third parties are strictly personal, not representing, therefore, the opinions and orientation of the company.

- Relations with the media

Pordenone Fiere S.p.A. believes for its activity that the media have a fundamental role in the dissemination of information. It entertains relations with its interlocutors, respecting the principles of transparency and committing itself to constantly inform all its interlocutors of its activities.

The activity of communication and disclosure of news relating to the company's activities is reserved exclusively to the people in charge of this function. It is forbidden for all other

persons to disclose news concerning Pordenone Fiere SpA. without prior authorization. All personnel must refrain from disseminating false and misleading information.

### **3 Relations with employees**

- Pordenone Fiere S.p.A. favours and pays attention to the professional and personal growth of its employees, sets out a receptive work environment by stimulating the proposal of professional contributions of individuals and strives to involve people in the sharing of objectives and in the assumption of responsibilities consistent with the roles occupied. The selection, remuneration and training policies of employees are based on criteria of professionalism, competence and merit, refusing any kind of discrimination or pressure from any source aimed at favouring the assumption or assignment of duties. Employees and external collaborators are required to act impartially avoiding any inequality of treatment and are committed to preserving an internal climate that respects the dignity and individuality of each person. The recruitments are carried out in full compliance with all legal and contractual regulations, favouring the incorporation of the worker in the workplace.

### **4 Relations with suppliers and consultants**

- Pordenone Fiere S.p.A. brings the contents of this Code of Ethics to the attention of suppliers and consultants.

- Suppliers and consultants must sign appropriate declarations of being aware of the principles contained therein, undertaking to observe them in the context of their relations with Pordenone Fiere S.p.A. and not to engage in any behaviour that violates these principles.

### **5 Control**

Pordenone Fiere S.p.A. systematically monitors its activity, keeping track of every undertaken operation in order to allow its accounting registration with the reconstruction of its motivations and the identification of responsibilities. In order to monitor the management to make it compliant with the law, the directors and employees are required to adhere to the prescribed rules for the recording of the events concerning the company, according to the responsibilities and roles held.

The members of the corporate bodies, employees and collaborators are required not to use the tangible and intangible assets, property and information assets owned by Pordenone Fiere S.p.A. for personal purposes or not related to the company activities.

### **6 Implementation and control of the Code of Ethics**

- Communication: the Code of Ethics is brought to the attention of employees and external collaborators through specific communication activities. In order to ensure the correct understanding of the Code of Ethics "the referent" prepares and implements an annual communication plan aimed at promoting knowledge of the principles and norms contained in the Code of Ethics.

- Reporting: all employees and collaborators can report, in writing or electronically and in a non-anonymous form, any violation or suspected violation of the Code of Ethics to the Supervisory Board that will analyze the report, conferring if it is deemed necessary with its author and the person responsible for the alleged violation.

- Violations: compliance with the provisions contained in this Code of Ethics must be considered an essential part of the contractual obligations envisaged for employees of Pordenone Fiere S.p.A. pursuant to art. 2104 of the Civil Code, as well as for external collaborators with reference to the existing contractual relationship.

Pordenone Fiere S.p.A. will impose, with consistency, impartiality and uniformity, sanctions proportionate to the respective violations of the Code of Ethics and comply with the provisions in force for the regulation of labour relations.

In case of violation of the Code of Ethics by the employees, the relevant measures will be adopted and the relevant sanctions will be applied in full compliance with art. 7, of the Law n. 300/70, of the current legislation and of the provisions of the collective negotiation in force.

The single punishable infractions and the relative irrevocable sanctions will be established in a special document to be posted in a place accessible to all.

The Code of Ethics establishes the obligatory nature of disciplinary action in the event of failure to comply with the behavioral standards set forth by it.

The violation of the rules of the Code of Ethics represents an infringement of the fiduciary binding inherent in the mandate of the members of the corporate bodies with all legal

consequences.

In accordance with Legislative Decree 231/01, the Supervisory Body must be informed about any measure adopted as a result of challenged violations of this Code of Ethics.