

**ETHICAL CODE**

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CONFEUROPA  
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## GENERAL INTRODUCTION

- Faced with the ever wider affirmation in society of the values of free initiative and the recognized social function of the free market and private property, the confederal system sets itself the goal of continuing to contribute to the development process with a sense of responsibility and moral integrity. of the Italian economy and the civil growth of the country. In this context, the "CONFEUROPA Imprese" considers the duty to:
  - preserve and enhance the reputation of the business class as an autonomous, responsible and ethically correct social force;
  - concretely contribute, first of all through its own behavior, to the improvement of the country-system.

The "CONFEUROPA Imprese" undertakes and through it all its components undertake:

- the Confederations and / or Associations
- associated entrepreneurs;
- entrepreneurs who hold associative positions;
- entrepreneurs who represent the system in external bodies;

to transparently implement and respect models of behavior inspired by autonomy, integrity, ethics and to develop consistent actions.

The whole System, from the single entrepreneur associated with the highest confederal leaders, must be shared and involved in the pursuit of the objectives and in compliance with the relative methods, as every single unethical behavior not only causes negative consequences in the associative context, but damages the image of the entire category and of the System, among the public opinion, the legislator and the Public Administration.

The ethics of conduct cannot be evaluated only in terms of strict compliance with the law and the statute. It is based on the convinced adherence to the highest standards of behavior in various situations.

The process by which these objectives can be achieved is necessarily two-way. The system

representative provides the guidelines, the tools and the concrete supports that make possible the high standards of behavior required and the Confederations and / or Associations undertake to incorporate them into their statutes and to adopt consequent behavior.

Par. 1 - Associates

In being part of the Confederal System, entrepreneurs undertake to take into account, in all their professional and associative behavior, the repercussions on the entire business and on the Confederal System. They therefore undertake:

a) as Entrepreneurs

- to fully apply laws and employment contracts;
- to behave fairly towards their employees, promoting their professional growth and safeguarding the environment, quality and safety at work;
- to assume a fair and correct attitude towards customers, suppliers and competitors;
- to maintain relationships inspired by fairness and integrity with the public administration and political parties;
- to consider the protection of the environment and the prevention of all forms of pollution a constant commitment;

b) as Associates

- to participate in the associative life;
- to contribute to the associative choices in full integrity and autonomy from internal and external pressures, having as a priority the interest of the entire category and of the Confederations and / or Association;
- to establish and maintain a full associative relationship, and exclude the possibility of associative relationships with competing organizations or conflittuali;

to communicate in advance to the Confederations and / or Associations of the System other different members;

to comply with the directives that the Confederation and / or the Association must provide in the various subjects and to express personal positions in advance in their own internal debate forums;

to promptly inform the Confederation and / or the Association of any situation likely to change its relationship with other entrepreneurs, requesting the necessary and adequate support.

#### Par. 2 - Associative vertices

The election is subject to the verification of the full compliance of the candidates with a rigorous and substantial adherence to irreproachable personal, professional and associative behavior.

Candidates undertake to provide the competent authorities with all the necessary and requested information.

The nominees undertake to:

- take up positions in a spirit of service to the members, the confederal system and the outside world, without making use of them for direct or indirect benefits. All associative positions are free;

- maintain a behavior inspired by autonomy, integrity, loyalty and a sense of responsibility towards members and institutions, eliminating personal political options during the assignment;

- follow the confederal directives, contributing to the debate in its own seats, but maintaining the unity of the system towards the outside world;

- make confidential use of the information they become aware of by virtue of their duties;

- treat members with equal dignity regardless of their size and sector of belonging;

- maintain with the political forces a behavior inspired by autonomy and independence, providing

correct information for the definition of the legislative and administrative activity;

effectively involve the decision-making bodies of the Association for participatory management open to the various instances;

to remit their mandate if for personal, professional or objective reasons their permanence may be harmful to the image of the business and the Confederation and / or the Association.

#### Par. 3 - External representatives

They are chosen from among the members, according to criteria of competence and independence, by resolution of the competent bodies, according to the statutes.

The Confederations and / or Associations undertake to inform the "CONFEUROPA Imprese" on their representation in external bodies.

Representatives undertake:

- to carry out their mandate in the interest of the designated body and associated entrepreneurs in compliance with the guidelines that the Confederations and / or Associations are required to provide;

- constant information on the performance of their mandate;

- to take on the offices not with remunerative intentions;

- to relinquish their mandate whenever there are causes of incompatibility or impossibility of continuing participation or in any case at the request of the Confederations and / or Associations;

- to inform and agree with the Confederation and / or the Association any further assignment deriving from the entity in which it was designated.

#### Par. 4 - Protection bodies

For the verification and application of the behavioral rules indicated above, the Board of Arbitrators - which will be constituted not only by "CONFEUROPA Imprese" also by all the member Confederations and / or Associations - is entrusted with the task of providing an opinion, obbligatorio ma non vincolante, sul profilo personale e professionale degli imprenditori che: chiedano

to join the Confederation and / or the Association; are candidates for associative positions; or are proposed for external assignments.

The Board of Arbitrators will be elected by secret vote by the Assembly and not co-opted, at a time other than the election of the President (one year earlier).

At a central level, this body can be referred to in second instance by all interested parties at a local or categorical level, or act on its own impulse.



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CHARTER OF VALUES

Summary

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PART I.

The Charter of values as a path

1. Producing value through values

"CONFEUROPA Imprese" believes it has a Charter of Values because it is aware that it has grown a lot in terms of number and type of associates and that it is destined to grow further.

Growth brings enrichment and strength and requires integration and compactness.

"CONFEUROPA Imprese" through the Representation of interests, through the Services and also through the collective identity it expresses, implicitly recalls some fundamental shared values which produce associative added value and which are the reason for being together.

The Charter of Values of "CONFEUROPA Imprese" has multiple objectives:

- serves to make explicit shared values;
- it is a document that has as its reference the confederal system as a whole;
- intends to support the Statute and the Code of Ethics;
- borrow the values of the company and decline them within a complex associative system;
- chooses from among the many possible values those that can accompany the Confederation and / or the association in the medium-long term rather than immediately;
- it is built through a shared method of comparison and such as to bring out the value chain of being associated.

Just as the company aims to develop a corporate value chain, so the Confederations and / or business associations can develop an associative value chain.

## 2. Address enlargement of components

In recent years many barriers have fallen, many superstructures present for many years in the Italian production and trading markets. This renewed freedom has brought together in "CONFEUROPA Imprese" with different cultures and different traditions.

This enlargement process is an evident sign of the attraction of "CONFEUROPA Imprese" which at the same time generates the need to guide the expansion of the components themselves.

Today there are in the system:

- small, medium and large enterprises;

subjects from the business world, who represent and protect the social, moral and economic interests of all the companies established individually or as a company, as well as business consortia and temporary business associations, which operate and are the expression of a process of support in the industrial, craft, agricultural, commercial, tertiary sector as well as in other economic market activities. Or that they even turn out to be the result of restructuring and outsourcing processes by companies;

- subjects who traditionally are located downstream of the production system, but who intend to take an "industrial" approach and identity in their way of operating (this is the case, for example, of tourism);

- network subjects (previously public) who have embarked on the path of gradual liberalization and privatization, with the consequence of having to gradually adopt corporate and market behavior (this is the case of ENI, Telecom, FS, etc.).

What unites the being together of these subjects, even if different in their origin, is their nature as a business, as an organized structure that produces value.

confederal, the trademark in which the members of "CONFEUROPA Imprese" are recognized, constitutes the symbol of the common identity and acts as a unifying reminder for all members, whatever their origin.

The Charter of Values represents the Minimum Common Denominator in terms of values that binds the components

under a single identity that responds to the enlargement of the membership base.

### 3. Recognize the strength of differences

The strength of "CONFEUROPA Imprese" comes from the difference between the companies that recognize themselves in the common values symbolized by the confederal, as a systemic wealth.

There are many differences between companies. There is not only the diversity linked to the small, medium and large size, to the location in the North, in the Center or in the South. It is above all what happens "inside" the production cycle that differentiates companies:

- the type of product: goods or services; durable, semi-durable, instrumental goods; final or intermediate; branded or unbranded;
- the type of market: global, national, local;
- the technology adopted: high technology, medium technology, low technology;
- the company organization chosen: centralized, decentralized, networked;
- the ownership form: family, individual, corporate or share;
- local roots: location within a district or isolated.

Recognizing and accepting differences is the strength behind "CONFEUROPA Imprese".

Every difference, which is not an opposition, is in fact the bearer of a useful value to the business system as well as to the associative system and is a resource for "creating a system".

### 4. Constantly promote integration

The articulation of the associative components brings with it the many possible convergences that outline an evolved path of integration.

Integrating different worlds, but united by a common "industrial soul", represents a constant process and a value to be pursued day by day.

Within companies we are witnessing the growth of those factors that tend to reduce distances, to accentuate interdependencies and to unite concrete business behaviors regardless of the sector and size:

the gradual outsourcing of parts of its value chain;

- the growing integration of the supplier / customer chain;
- the diffusion of network business systems;
- the growing incorporation of intangible factors into the product;
- the increasing interdependence between companies and the external system;
- the continuous combination in all enterprises of the economy of scale with the economy of scope.

As businesses integrate to strengthen themselves in the market, the associative system must also find strength in integration, in the search for common purposes, in associative identity.

#### 5. Accompanying interests towards values

The construction of a common Charter of Values constitutes a process of convergence to define common values.

It is easier to recognize one's own interests or those of one's sector than those common to the entire system of representation.

The Charter of Values has the purpose of "accompanying" interests towards common values: by exploiting the strength that derives from what distinguishes and at the same time the strength that comes from what unites, the common Associative Agreement that today binds the companies of "CONFEUROPA Imprese".

The Charter of Values testifies to the desire to stay together, on the basis of common values, beyond differences and in the transparency of commonly shared rules, "accompanying" the great mass of specific interests towards general values.

The construction of a Charter of Values creates an opportunity to start weaving an evolved associative development for the next century.

Signed: