

CODE OF ETHICS

1. INTRODUCTION

The "**RAGGIO DI SOLE ONLUS**" association provides residential and semi-residential maintenance services for Adult Psychic Disabled, in line with national and regional regulations and the Lazio Region guidelines. The structure is sensitive to the need to ensure conditions of fairness and transparency in the performance of health services to protect the position and image of the company, the expectations of its members and the work of its employees and collaborators. It undertakes to ensure the best diagnosis and treatment, in terms of appropriateness, timeliness, effectiveness, systematicity and continuity required by the patient's condition, to which it guarantees the most exhaustive information on the methods of care adopted. The guiding principles of the Code of Ethics are contained in this document. The "**RAGGIO DI SOLE ONLUS**" association hopes for the spontaneous sharing, adherence and diffusion of the Code and prescribes its observance and application by every person who works on behalf of the "**RAGGIO DI SOLE ONLUS**" ASSOCIATION or who is in contact with it. The application of disciplinary and / or contractual sanctions for any violations of the Code is envisaged.

The Code of Ethics is subjected to a continuous improvement cycle in operation:

- significant variations in the associative, organizational and infrastructural structure
- significant changes in the reference regulatory framework
- changes in the risk profile of the Association
- the occurrence of accidents and non-compliance following current and potential violations of the code of ethics itself

The revision of the Code of Ethics is approved by the President.

2. GENERAL PRINCIPLES

2.1 GENERAL ETHICAL PRINCIPLES

In providing health services, the "**RAGGIO DI SOLE ONLUS**" association is inspired by the ethical principles set out below, which require compliance by the parties involved in the activities. The "**RAGGIO DI SOLE ONLUS**" association conducts its business in compliance with EU, national and international regulations, rejecting corruption and any illegal practice. No behavior contrary to the legislation in force, to this Code of Ethics or to the regional regulations put in place by the corporate governance bodies, by the management of the Association and - in general - by all employees and collaborators in the execution of the tasks or tasks entrusted, even if motivated by the pursuit of an interest or an advantage of the Association, it can be considered tolerated and

justified and involves the adoption of sanctioning measures. The association believes, fundamental importance, the performance of the services by the employees and collaborators of the association according to diligence, competence, professionalism and efficiency, also in order to provide users with high quality performances. The Structure considers the impartiality of treatment a fundamental value in the context of each internal and external relationship and considers the individual, his values and his rights, including that of health, to be protected. The structure believes its image and its reputation values that, as a common heritage, must be protected and developed also through the full dissemination, sharing and observance of the ethical and behavioral principles contained in this code. All those who act, work and collaborate in any way with the **"RAGGIO DI SOLE ONLUS"** association have the duty to maintain a behavior that conforms to the general principles of absolute honesty, loyalty, good faith, correctness and diligence. As well as to the specific obligations that may derive from ethics and in any case from those principles of a person and their mission. In no way can the conviction of acting in the interest or to the advantage of the structure justify the adoption of behaviors in contrast with the principles indicated in this code.

2.2 RECIPIENTS OF THE CODE OF ETHICS

The rules of the code of ethics apply without exception to the employees of **"RAGGIO DI SOLE ONLUS"** association and to all the subjects who, directly or indirectly, permanently or temporarily, establish, relationships and collaborative relations, cooperating in the performance of his business and the pursuit of his goals.

The principles of the code of ethics must inspire the members of the Governing Council, in any decision or action relating to the management of the Association. Likewise the managers, in giving concrete effect to the activity of management, must be inspired by the same principles. This is in order to represent a reference model for employees and collaborators.

Each Head of the structure:

- represent their own behavior for an example for their collaborators
- promotes compliance with the codes rules by the recipients
- operate so that the recipients understand the compliance that the rules of the code is an essential part of the quality of work and of its activity
- makes immediate corrective measures when required to do so by the situation
- prevents, within the limits of its competences and attributions, possible behaviors not compliant with the current legislation or the present code of the internal rules

2.3 OBLIGATIONS OF THE RECIPIENTS

All actions, operations, negotiations, and behaviors put in place by the recipients of this code, will need to carry out the work activity based on the principles of honesty, correctness, integrity, transparency, legitimacy, clarity and mutual respect. The recipients undertake to actively collaborating in the verification activities - internal and external - according to the current regulations and internal procedures. All activities must be carried out with commitment and professional rigor. Each recipient must provide professional contributions adequate to the responsibilities assigned. They must act in such a way as to protect the prestige and image of the structure and of the region for which they operate. The employees of the **"RAGGIO DI SOLE ONLUS"** association, in addition to fulfilling the general duties of loyalty, fairness and execution of the employment contract in good faith, must refrain from carrying out activities in competition

with those of the association. They must respect the rules of the association and follow the principles of the code.

The recipients must avoid situations and/or activities that could lead to conflicts of interest with those of the "**RAGGIO DI SOLE ONLUS**" association. Also avoid situations that could interfere with their ability to make impartial decisions while safeguarding their best interests.

Employees, and all those who collaborate with the "**RAGGIO DI SOLE ONLUS**" association, are required to adapt their behavior to the provisions and principles of the code of ethics. They are required to do so without taking initiatives in contrast with the Code itself. In particular, the recipients of the code of ethics are required to comply with the provisions and principles listed. To protect the image and reputation of the dispenser, it is essential that the relationships with subjects outside the association are based on:

- full transparency and fairness
- comply with the law in reference to the provisions on crimes against the public administration
- independence from all forms of conditioning, both internal and external

2.4 ACCREDITATION WITH THE NATIONAL HEALTH SERVICE

The structure is aware of the importance and social significance for the community and of the service provided. The provider carries out the service entrusted under the accreditation regime with the regional health service. They must operate in compliance with the provisions contained in the Contract stipulated with the competent ASLs and with the Lazio Region. They must comply for the primary purpose of allowing service users the full and continuous exercise their right to free and safe choice of health services. In carrying out the activity and in consideration of the public relevance of the service provided, the "**RAGGIO DI SOLE ONLUS**" association pays the utmost care to the enhancement of the image of health protection.

2.5 CONTRACTUAL VALUE OF THE CODE OF ETHICS

Compliance with the rules and provisions contained in the Code of Ethics is an integral and essential part of the contractual obligation, deriving from employment relationships, for employees, and from contractual regulations, for non-subordinate collaborators. The violation of the aforementioned rules will constitute non-fulfillment of the obligations deriving from the employment or collaboration relationship, with any legal or contractual consequence.

3. PRINCIPLES IN REALTIONS WITH THIRD PARTIES

3.1 GENERAL PRINCIPLES

In relations with third parties the Provider is inspired by principles of loyalty, fairness, transparency and efficiency. Employees of the "**RAGGIO DI SOLE ONLUS**" association and external collaborators must follow correct behavior in the affairs of interest of the Association and in relations with the Public Administration. All practices of corruption, fraud, illegitimate favors, collusive behavior, solicitations (direct and / or through third parties) of personal and career advantages for oneself or others are explicitly prohibited. The "**RAGGIO DI SOLE ONLUS**"

association undertakes to identify and define specific transparent, documented and traceable management methods. Specifically for incoming and outgoing financial resources capable of preventing the commission of crimes.

3.2 RELATIONSHIPS WITH USERS

The structure and all of its collaborators must pursue maximum user satisfaction, ensuring truthful and comprehensive information. This information is about the clinical care protocols adopted and the services provided in order to allow legal guardians to make informed decisions (see "informed consent"). The consent of the patient / legal guardian needed to perform a specific medical treatment needs to be for the correct establishment of the professional work relationship, in implementation of constitutionally guaranteed principles and, in any case, implementation of an ethical principle that is part of the relationship between doctor and patient. The user / legal guardian, following the complete and overall evaluation of the diagnosis, medical treatment proposed by the doctor, purpose of the treatment, possible alternatives, and the risks possibly associated with the treatment, is able to decide freely whether to undergo to medical treatment only with giving consent. In order to allow informed consent, the **"RAGGIO DI SOLE ONLUS"** association undertakes to:

- Guarantee the patient/legal guardian the most appropriate information on the diagnosis, prognosis, prospects and possible diagnostic-therapeutic alternatives
- Not to use tools of persuasion, scientific or other nature, and not to use persuasion that is misleading or untruthful
- To ensure adequate and comprehensive information information to foreign users/legal guardians, when necessary through the use of interpreters with the appropriate language skills
- Prohibit the adoption by all collaborators, of behaviors favoring unequal treatment or privileged positions in the provision of health services

In order to establish a better relationship with users, the **"RAGGIO DI SOLE ONLUS"** association also undertakes to periodically verify the correct behavior of the personnel assigned to receiving and managing relations with users.

3.3 RELATIONS WITH EMPLOYEES AND DOCTORS

The **"RAGGIO DI SOLE ONLUS"** association provides the widest dissemination of the Code of Ethics to doctors and employees. The **"RAGGIO DI SOLE ONLUS"** association proceeds to the identification and selection of doctors and employees with absolute impartiality, autonomy and independence of judgment, in full compliance with current legislation and internal procedures. The authority requests that doctors and employees know and observe the provisions of the Code of Ethics. Also know compatibly with the individual possibilities. They promote their knowledge to newly hired employees as well as to third parties affected by the application of the same.

Employees are required to:

- Refrain from behavior contrary to the rules of the Code of Ethics and demand compliance

- Contact their superior or persons assigned in case of need for clarification on how to apply them
- Report promptly to superiors or to the functions assigned to:
 - Any news, directly reported or reported by others, regarding possible violations of the rules of the Code of Ethics
 - Any request to violate the rules addressed to them
- Collaborate to verify possible violations with the structures appointed for this purpose

The employee will not be able to conduct personal investigations or report the news to others if not to his own superiors or to the functions that may be appointed. Anonymous reports are prohibited. Employees are therefore required to report in writing, to the email address odv@raggiodisoleonlus.it, to the supervisory body, any violation of the Code of Ethics of which they become aware of. Any unfounded report made in bad faith for the purpose of causing harm to colleagues and / or collaborators will be considered an offense and subject to disciplinary sanctions. The Association places the maximum and constant attention in the valorization of human resources. To this end, it considers the merit-based criterion, the professional competence, honesty and correctness of conduct, privileged foundations for the adoption of every decision concerning the career and any other aspect relating to the employee. Employees are required to conduct actions that are constantly respectful of the rights and personalities of colleagues, collaborators and third parties, regardless of their hierarchical position within the association. Doctors and employees must correctly use the assets of the Association made available to them, safeguarding, in general, the value of the assets of the Association. The **"RAGGIO DI SOLE ONLUS"** association recognizes and respects the right of doctors and employees to participate in investments, business or other activities other than those carried out in the interest of the Association itself. They can carry out these interests as long as it involves activities permitted by law and / or CCNL of the sector, as well as compatible with the obligations assumed as employees. In any case, employees must avoid all situations and all activities in which a conflict with the interests of the structure may occur or interfere with their ability to make impartial decisions in the best interests of the **"RAGGIO DI SOLE ONLUS"** association and with the rules of the Code of Ethics. Any situation that may constitute or determine a conflict of interest must be promptly communicated to the superior or to the function assigned to it. In particular, all physicians and employees are required to avoid conflicts of interest between personal and family economic activities and the duties / functions they cover within the structure to which they belong.

They are required to take care of their skills and cultivate their professionalism, gaining experience and collaboration, stimulating the professional growth of their collaborators. To contribute, through the constant professional commitment and the correct personal behavior, the achievement and maintenance of the goals of excellence typical of the **"RADIO DI SOLE ONLUS"** association in the provision of health services; to update themselves on the current legislation; to scrupulously observe the precepts provided by the Code of Ethics to the extent applicable to their work. In particular, employees, collaborators and doctors are prohibited from:

- Use scientific, or other persuasion tools, whose contents are misleading or otherwise untruthful
- Providing unnecessary services or declaring services not actually provided
- Use diagnostic and care codes other than the codes corresponding to the service actually provided

- To duplicate the invoicing of the same service or not to issue credit notes if non-existent or non-financeable services have been invoiced, even by mistake
- Behave in a way that tends to alter the correct management of waiting lists
- Alter or tamper with the contents of the medical records in its entirety
- use, for its own purposes, the projects, systems, procedures, methods, relationships or other invention or activity developed by the structure and of which the latter owns individual property rights.

3.4 RELATIONS WITH COLLABORATORS AND CONSULTANTS

The "**RAGGIO DI SOLE ONLUS**" association identifies and selects collaborators and consultants with absolute impartiality, autonomy and independent judgment. The provisions of the previous point for employees also apply to external collaborators and consultants, within the limits of relations maintained with the structure. Behavior contrary to the principles expressed in the Code of Ethics can be considered a serious breach of the duties of correctness and good faith in the execution of the contract. This would be a reason for breach of the fiduciary relationship and just cause to terminate contractual relations.

3.5 RELATIONS WITH SUPPLIERS

In carrying out its business and managing customer relations, the "**RAGGIO DI SOLE ONLUS**" association complies scrupulously with the laws, with the principles of this Code, and with existing contracts and with internal procedures. Employees in charge of relations with suppliers and service providers must select the same and manage their relationships according to impartiality and correctness. Also to avoid situations of conflict of interest, including potential ones, by reporting to the employee responsible for the existence or occurrence of such situations. In tenders, procurement and, in general, supply of goods and / or services, the "Recipients" of the provisions of this Code are obliged to:

- observe the internal procedures required for the selection and management of relations with suppliers
- do not preclude to any supplier company in possession of the requisites the possibility of competing to win a supply, adopting in the selection objective evaluation criteria, according to declared and transparent methods
- maintain an open dialogue with suppliers, in line with good commercial practices, but free from personal obligations
- not accepting goods or services from external or internal subjects in the face of obtaining confidential information or initiating actions or behavior aimed at favoring such subjects, even if there are no direct repercussions for the Association
- immediately report any attempt or case of unjustified alteration of normal commercial relations to the Administration of the "**RAGGIO DI SOLE ONLUS**" association

Gestures of commercial courtesy, such as gifts or forms of hospitality, are allowed only if they are of modest value (less than € 100.00) and in any case such as not to compromise the integrity or independence of judgment of a of the parts and cannot be understood as aimed at obtaining

advantages improperly. In any case, this type of expense must always be authorized by its manager and adequately documented. Likewise, the corporate bodies, management, employees, external collaborators and in particular in the event of the exercise of a public function or a public service, are prohibited from receiving and/or requesting non-attributable gifts or preferential treatment to normal courtesy relations. In this latter case, it is mandatory to formally report the situation to your manager. For particular types of goods /services, in addition to the normal selection criteria, the concrete existence of adequate company quality systems must also be considered.

3.6 RELATIONSHIPS WITH OTHER DISPENSERS

The structure strictly complies with the legal provisions on competition and refrains from engaging in deceitful, collusive behavior and, more generally, any behavior that could integrate a form of unfair competition

3.7 RELATIONS WITH THE PUBLIC ADMINISTRATION

The Association adopts the most rigorous observance of applicable Community, national and regional laws in relations with the Public Administration, with bodies that carry out activities of public utility or public interest or in any case with public relations. The management of negotiations, the assumption of commitments and the execution of relations, of any kind, with the Public Administration, with entities that carry out activities of public utility or public interest or in any case with relations of a public nature are reserved exclusively for the functions of the Association for this purpose and / or authorized. In relations with the Public Administration, the "**RAGGIO DI SOLE ONLUS**" association and every employee, collaborator or consultant, must not try to improperly influence the decisions of the institution concerned, in order to obtain the exercise of its function or his power or the performance of acts that do not conform or are contrary to the duties of office, in particular by offering or promising autonomously or following induction, directly or indirectly, gifts, money, favors or utilities of any kind.

The employee or collaborator who receives instructions to operate in violation of the terms set out above is required to immediately notify the Supervisory Body upon suspension of each report. In any case, the "**RAGGIO DI SOLE ONLUS**" association ensures full transparency and complete information in the preparation of communications, prospectuses and notices directly to the public administration. The recipients are required to strictly refrain from displaying false and /or altered documents to the public administration, or to remove and /or omit the exhibition, if due, of documents, information or data of any kind, or to keep a conduct tending to draw the Public Administration is deceived, in particular as regards the management of activities related to hospitalizations and outpatient practices.

Each operation provided on behalf of the NHS must be legitimate, congruous and adequately documented in order to be able to carry out controls that allow (I) to verify the characteristics and motivations and (II) identify the subjects who have authorized, carried out, or registered and verified the operation itself.

3.8 RELATIONS WITH INSTITUTION AND ASSOCIATIONS THE "RAGGIO DI SOLE ONLUS" ASSOCIATION:

- does not finance parties, their representatives and candidates refrain from any improper pressure (direct or indirect) against politicians

- can participate in request for contributions from non-profit organizations and associations
- any sponsorship activities may relate to the topics of medicine and scientific research, social issues, the environment, sports, entertainment and art and are intended only for events that offer a guarantee of quality. In any case, in choosing the proposals to which to adhere, the structure is careful to prevent and avoid any possible conflict of interests of a personal order or of the structure as such

3.9 RELATIONS WITH THE SUPERVISORY AND CONTROL SUBJECTS

The Association, in all its forms, draws on its relationships with the subjects appointed to supervise and control the maximum collaboration in full respect of their role, their autonomy and their power of initiative, committing to give prompt execution to their requirements. The Association undertakes to provide - even if necessary as a preventive measure - all the information requested by the parties appointed to supervise and control the services provided. This is appointed in a complete, correct, adequate and timely manner. To this end, the structure prepares and implements the appropriate organizational procedures appointed to identify the competent subjects to coordinate with the supervisory and control bodies, as well as to provide for the collection, processing and transmission of the information required by these subjects.

3.10 RELATIONSHIPS WITH TRADE UNION ORGANIZATIONS

The organization does not make contributions of any kind, directly or indirectly, to trade unions, nor to their representatives or candidates, except in the forms and in the manner prescribed by current regulations. Relations with trade unions are based on principles of correctness and collaboration in the interest of the "**RAGGIO DI SOLE ONLUS**" association, of employees and the community.

3.11 RELATIONSHIPS WITH MASS COMMUNICATIONS

The Association addresses the press and mass communication bodies only through the management assigned to it, in compliance with the communication policy defined by the structure and with the regional regulations in force in matter. Employees should not provide information of any kind to the representatives of the press and mass media in general, nor have any type of contact with them in order to exploit news of the Association, without the authorization of the Management.

4. ENVIRONMENT HEALTH AND SAFETY

The "**RAGGIO DI SOLE ONLUS**" association considers the environment and nature fundamental values very seriously, to be protected and defended. To this day, the structure, as part of its activities, is committed to contributing to the development and well-being of the communities in which it operates, pursuing the objective of ensuring the safety and health of employees, external collaborators and users. The "**RAGGIO DI SOLE ONLUS**" association undertakes to manage its activities in full compliance with the regulations in force concerning the environment, health and safety at work. Operational management must refer to advanced criteria of environmental protection and energy efficiency by pursuing the improvement of health and safety conditions at work. Research and technological innovation must be dedicated in particular to the promotion of products

and processes that are increasingly compatible with the environment and characterized by an ever-increasing attention to the safety and health of operators.

The association is committed to spreading a culture of safety at work by developing risk awareness, and promoting responsible behavior by employees and collaborators who, in the context of their duties and functions, participate in the risk prevention process, of environmental protection and protection of health and safety at work with regard to themselves, their colleagues and third parties.

THE MOTIVES:

- all the staff at the center must systematically and punctually respect the provisions concerning health and safety at work.
- the staff of the center having functions of coordination or interfacing with suppliers, contractors and external collaborators must systematically and punctually comply with the provisions on health and safety at work.

No employee or collaborator can derogate from or make exceptions to the above even if this were to manifest itself in a clear advantage or interest for the association.

The general measures for the protection of health and the safety of workers that the "RAGGIO DI SOLE ONLUS" association undertakes to adopt are:

- assessment of health and safety risks;
- reduction of risks at source;
- prevention planning;
- hygienic measures and health control of workers based on specific risks, emergency measures to be implemented in the event of first aid, fire fighting, evacuation of workers and serious and immediate danger; • regular maintenance of environments, equipment, machines and plants;
- information, training, consultation and participation of workers or their representatives on issues concerning safety and health at work.

5. PRINCIPLES IN ACCOUNTING AND DATA PROCESSING ACTIVITIES.

5.1 Accounting and Recordings

The "**RAGGIO DI SOLE ONLUS**" association observes the rules of correct, complete and transparent accounting, according to the criteria indicated by the legislative provisions on the subject, including those relating to criminal law, civil law and tax, as well as the current accounting principles defined by the appropriate professional Commissions.

In the activity of accounting for the facts relating to the management of the structure, employees and collaborators are required to respect the current legislation and internal procedures so that each operation is, in addition to being correctly recorded, also authorized, verifiable and legitimate. Employees and collaborators are required to act with transparency towards the persons in charge, the Statutory Auditors, and the Supervisory Body, when appointed, to provide them with maximum collaboration in the performance of their respective verification and control activities. For each operation an adequate supporting documentation of the activity carried out is kept in the records, in order to allow:

- easy accounting recording.
- the identification of the different levels of responsibility.
- the accurate reconstruction of the operation, also to reduce the probability of interpretative errors.

Each registration must reflect exactly what is shown in the supporting documentation. It is the duty of each "recipient" to ensure that the documentation is easily traceable and ordered according to logical criteria. The "recipients" who become aware of omissions, falsifications, negligence of the accounting or of the documentation on which the accounting records are based, are required to promptly report the facts to their superior or to the competent function.

5.2 Privacy and Protection

The activities provided by the structure constantly require the acquisition, storage, processing, communication and diffusion, also through IT or telematic systems, of news, documents and other data pertaining to negotiations, administrative procedures, financial operations, know-how (contracts, deeds, software), etc. The data banks of the Association may contain, even on computer or electronic media:

- Personal data and sensitive data protected by the law protecting privacy
- Data which, due to contractual agreements, cannot be disclosed externally
- Data whose inappropriate or untimely disclosure could cause damage to the interests of the Association

All the activities related to the processing, also through IT or telematic systems, of personal data, sensitive or confidential data must be managed in the strictest observance of the regulations in force on the subject (compliance with the general authorizations of the Guarantor for the protection of personal data and request for specific authorizations in the event of processing different from the general authorizations themselves). It is the duty of every "recipient" to ensure the confidentiality required by the circumstances for each piece of news learned based on his/her job function. The "**RAGGIO DI SOLE ONLUS**" association undertakes to protect information relating to its employees and third parties, generated or acquired internally and in business relationships, and to avoid any improper use of this information. The information, knowledge and data acquired or processed by the "Recipients" during their work or through their duties belong to the Association and cannot be used, communicated or disclosed without specific authorization from the superior or the competent function. Without prejudice to the prohibition to divulge information pertaining to the organization and methodologies of service provision or to use it in such a way as to be able to cause prejudice to it, each "recipient" must:

- acquire and process only the necessary and appropriate data for the performance of their duties
- keep the data in such a way that it is prevented from becoming unauthorized by others
- communicate the data in the context of established procedures and/or with the explicit authorization of the superior positions and / or competent functions and in any case, in any case, after having ascertained the disclosure in the specific case of the data

- make sure that there are no absolute or relative constraints to the disclosure of information regarding third parties connected to the Association by a relationship of any nature and, if necessary, obtain their consent;
- associate the data in such a way that any person authorized to have access to it can easily draw a picture that is as precise, exhaustive and truthful as possible. With reference to the relationship with users, please refer to paragraph 3.2.

To ensure compliance with the regulations on privacy, all the operators of the Association must use "IT" and telematic tools correctly and legitimately. Avoiding any use that is for the purpose of damaging the information, data, programs or systems of others /or the unlawful interception, obstruction or interruption of other people's computer or electronic communications. Access to computer systems and programs must be in compliance with the rights of third parties on the aforementioned systems and programs, exclusively using legitimately acquired procedures and access keys.

6. PERSONAL POLICIES

6.1. RELATIONSHIPS WITH HUMAN RESOURCES

The "**RAGGIO DI SOLE ONLUS**" association recognizes a central role in the development of human resources, respect for their autonomy and the importance of their participation in the pursuit of the mission of the Association. The "**RAGGIO DI SOLE ONLUS**" association reaffirms its commitment to strongly argue against any kind of discrimination in the workplace associated to sex, nationality, religion, political, union and personal opinions, economic conditions. Employees who believe they have suffered discrimination may report the incident to the Personnel function and / or their manager who will proceed to verify the actual violation of the Code of Ethics. The structure reaffirms the commitment to preserve the moral and physical integrity of its employees, doctors, collaborators and consultants.

6.2. HARASSMENT AT THE WORKPLACE

Harassment at the workplace is strictly forbidden. The structure requires that in internal and external work relations no harassment is given, such as:

- creation of an intimidating, hostile or isolation work environment for individuals or groups of workers;
- unjustified interference with the performance of other people's work;
- the obstacle to the individual job prospects of others for mere reasons of personal competence. The Association prevents, as much as possible, and in any case pursues mobbing and personal harassment of any kind and therefore also sexual.

6.3. SUBSTANCES AND ALCOHOL ABUSE

The structure requires each "Recipient" to personally contribute to maintaining the work environment respectful of the sensitivity of others. In the course of work and in the workplace it is absolutely forbidden, and therefore the assumption of the risk of prejudice of these environmental characteristics will be considered a conscious decision:

- working under the effects of abuse of alcoholic substances, drugs or substances having a similar effect;

- consume or transfer drugs at any title during the course of work. The Association undertakes to promote the social actions provided for by the current legislation.

All actions towards alcohol and substance abuse will be taken very seriously.

6.4. SMOKING

In compliance with current legislation, smoking is prohibited in the workplace.

6.5. USE OF THE WORKPLACE ASSETS

It is the duty of every employee or collaborator to guard the assets of the Association with care and respect, avoiding improper use of the assets available to them for official reasons. The non-use of the assets and resources owned by the Association and supplied to staff and collaborators due to the duties of their offices is not permitted, for example the use of the computers.

The goods unsuitable for the intended use as they are faulty, out of maintenance or otherwise lacking in the functional technical characteristics such as to guarantee their safe use, must be identified and kept in such a way as to prevent their use. No employee or collaborator is authorized to derogate from this provision even if this is manifested in a clear interest or advantage for the Association.

All employees or collaborators must comply with the appropriate security policies for the management and use of the technological resources assigned to them (fixed and portable computers, software, peripherals, e-mail accounts, internet access and systems external to the Association, etc.). No operator of the Association is authorized to derogate from or to derogate from this provision even if this were to manifest itself in a clear interest or advantage for the Association.

All the information that resides in the computerized and telematic systems of the association, including e-mail, are property of the Association and must be used exclusively for the carrying out of the activities of the Association with the modalities and limits indicated by the Association.

All the operators of the Association who use the Association's "IT" systems in the performance of their duties, also possibly to connect to the "IT" systems of other subjects, must adhere strictly to professional purposes and be limited to the tasks assigned to them. They must also systematically and strictly comply with the applicable provisions regarding information security.

7. VERIFICATIONS

7.1. INTERNAL CONTROLS

The "recipients" must be aware that an Organization, Management and Control Regulation is adopted, articulated in multiple, specific and codified procedures, systematically and constantly updated in order to ensure compliance with current legislation and full effectiveness, and aware of the contribution and of the importance that this management and control organizational model ensures to the achievement of the strategic and operational association objectives and efficiency.

7.2 REGISTRATION OF OPERATIONS

All the services of the "**RAGGIO DI SOLE ONLUS**" association must have an adequate registration, in order to ensure an effective and concrete traceability of the same, and it must be possible to verify the decision-making, authorization and execution process. For each operation there must be adequate documentary support in order to be able to proceed, at any time, to carry out controls that certify the characteristics and reasons for the operation and identify who authorized, performed, registered, verified the operation itself.

7.3 SIGNALS AND OBLIGATION TO COMMUNICATE TO THE ADMINISTRATION OF STRUCTURE

All Recipients of the Code are required to promptly report to the ODV any behavior contrary to the provisions of the code itself, the Organizational Model for the prevention of crimes, national and regional laws and internal procedures. The structure has worked to activate dedicated communication channels (dedicated e-mail address odv@raggiodisoleonlus.it) where it can send any reports regarding non-compliance with the provisions of this Code). Whistleblowers will be guaranteed against any form of retaliation, discrimination or penalization; the confidentiality of the identity of the informant will also be guaranteed without prejudice to the legal obligations and the protection of the rights of the Association or of persons accused wrongly and/or in bad faith

8. CONSEQUENCES OF INFRINGEMENT OF THE PROVISION OF THE CODE OF ETHICS

8.1 SUPERVISORY BODY

The "**RAGGIO DI SOLE ONLUS**" association has undertaken to establish, in accordance with Legislative Decree 231/2001 and subsequent amendments, a monocratic Supervisory Body composed of one member (President) marked by the requirements of autonomy and independence, and consequently equipped with autonomous and effective powers of initiative, inspection and control, and with reference to which the "Internal operating regulation" was drawn up and adopted, periodically updated in order to ensure its topicality, efficiency and operational effectiveness. The supervisory body must:

- supervise, among other things, compliance with the Code of Ethics, as well as compliance with the Organization, Management and Control Regulations, promptly reporting to the Presidency any violations of the same
- guarantee the maximum diffusion of the Code of Ethics and the Organization, Management and Control Regulations, through an adequate information and awareness plan aimed at promoting awareness of the principles and rules contained therein
- ensure the constant updating of the Code of Ethics and of the Organization, Management and Control Regulations, in relation to their actual effectiveness and to the changing needs of the Association and the current legislation
- carry out checks, including preventive checks, in relation to any news of violation of the rules of the Code of Ethics and of the Organization, Management and Control Regulations, assessing the facts and assuming - in the event of an ascertained violation - adequate sanctions

- guarantee against possible retaliation of any kind deriving from having provided information on possible violations of the Code of Ethics and of the Organization, Management and Control Regulations.

The information and reports acquired by the Supervisory Body and the structures used by it are considered confidential and cannot be disclosed except in the cases provided for by current legislation.

8.2 DIFFUSION CODE OF ETHICS

In any case, the "**RAGGIO DI SOLE ONLUS**" association undertakes to communicate to all the recipients of this code the values and principles contained therein, to guarantee their internal and external distribution by:

- the distribution to all members of the Corporate Bodies, to doctors, collaborators and employees;
- posting in an accessible place and publication on the Association's website
- making available to third party recipients and any other interlocutor on the Association's website

All medical and employee personnel, administrators, auditors, consultants and major suppliers must read the Code and undertake to follow the provisions and rules contained therein.

In addition, the SB will organize periodic training initiatives on the principles provided by the Code itself.

8.3 CONSEQUENCES OF INFRINGEMENT OF THE CODE FOR EMPLOYEES

Failure to comply with and / or violation of the rules of conduct imposed by the Code of Ethics and the Association's procedures, by employees of the Association constitutes non-fulfillment of the obligations deriving from the employment relationship and the disciplinary offense. With reference to the sanctions that may be imposed, it is specified that they will be applied in compliance with the provisions of the disciplinary system currently in force applicable to the various professional categories of the "**RAGGIO DI SOLE ONLUS**" association and that the adoption of the same must take place in compliance with the provisions sanctioned in the aforementioned legislation. These penalties will be applied on the basis of the relevance of the individual cases considered and will be proportionate based on their seriousness. The management of disciplinary proceedings and the imposition of sanctions remain the responsibility of the appointed and delegated functions of the Association.

8.4. CONSEQUENCES OF INFRINGEMENT OF THE CODE FOR MANAGERS, BOARD OF AUDITORS AND AUDITOR OF AUDITORS

In the event of violation by managers, internal procedures and the Code of Ethics, the Chairman or, in the event of a conflict of interest or in the most serious cases, the Board of Directors, will assess the facts and behavior and take the appropriate steps towards of the responsible parties bearing in

mind, that these violations constitute non-fulfillment of the obligations deriving from the employment relationship. In the event of violation of the Code of Ethics by the Audit Committee, the Supervisory Body will inform the entire Board of Directors.

In case of violation of the Code of Ethics by the Board of Directors, the Supervisory Body will inform the Shareholders' Meeting.

8.5. CONSEQUENCES OF VIOLATION OF THE CODE FOR COLLABORATORS, CONSULTANTS AND OTHER THIRD PARTIES

Any conduct by collaborators, consultants or other third parties connected to the association by a non-working contractual relationship, in violation of the provisions of the Code of Ethics, may determine, according to the specific clauses included in the assignment letters, the termination of the contractual relationship, without prejudice to any request for compensation if damage results from this behavior, even independently of the termination of the contractual relationship.