



c a s s i o p e a

STRATEGIE PER COMUNICARE.

1. INTRODUCTION

I Cassiopea Roma s.r.l was established in Rome in 2009, and is an integrated communications agency supplying services to both private and institutional clients. Communication aims are coordinated with other elements of the marketing mix, particularly regarding timescales of production and the commercialisation of the product or service. We offer the following products and services: advertising (newspaper promotions, radio announcements, tv adverts); below the line (coordination of logo and images, brochures, monographs, pamphlets, folders, newsletters, editorials, financial reports); multimedia, events, festivals, conferences; copywriting (naming of merchandise, product lines, products, editing of texts for business presentations and publicity); marketing (studying strategies and communication interventions over the short and long term).

II Objectives of the Code of Ethics

The Code of Ethics is aimed at aligning the management of Cassiopea Roma s.r.l with the principles of respect not only for the law, but also for loyalty, professional courtesy, and economic efficiency in our internal and external relations outside of the company, in order to encourage an unified approach which is geared towards satisfying stakeholder demands and building a positive business reputation.

With the approval of this Code of Ethics, the company declares that it will base its activities on the principles contained herein, with the aim of not undertaking or pursuing any relationship with anyone who doesn't share the spirit or violates the principles and the rules of conduct.

This document is intended to summarise, particularly in light of the Legislative decree of 8th June 2001, n. 231, the values, business culture and rules of behaviour which Cassiopea Roma s.r.l places at the heart of all its business affairs.

At no time can the pursuit of business interests take precedence over respect for regulations currently in place or the contents of this Code of Ethics.

III Scope of application and structure of the document

The Code of Ethics guides the behaviour and is therefore binding for the behaviour of all associates with Cassiopea Roma s.r.l.

Associates are the Sole Director, the employees and all those who, in various roles, act in the name of, on behalf of, or in the interests of Cassiopea Roma s.r.l, regardless of the legal definition of the relationship.

The Code of Ethics is subdivided into the following three parts.

- The Ethics Charter: formalises the mission, the values and the principles which form the basis of the culture at Cassiopea Roma s.r.l
- Code of Conduct: sets out the areas of responsibility and behaviour to follow in order to conform with the principles outlined in the previously mentioned charter



- **Control and monitoring:** identifies those responsible for upholding the Code of Ethics and illustrates how to apply the values and standards of behaviour described in order that they become standard daily practice.

THE ETHICS CHARTER

Conduct in business affairs

Legality – All associates are required to respect the law and regulations, the Code of Ethics and the internal rules of the company, applying them with integrity and equanimity.

Integrity - In all relations with third parties Cassiopea Roma s.r.l. commits to acting correctly and transparently, avoiding disingenuous information and behaviour which might take unfair advantage of another's position of vulnerability or lack of awareness.

Loyalty – In our relationships with external partners, relationships with collaborators and relationships between these two must be characterised by the utmost loyalty, which consists of acting with a sense of responsibility and in complete good faith in every action or decision.

Transparency – All the actions of the Company and its relations with its own stakeholders must be carried out with a guarantee of utmost propriety, completeness and promptness of information, according to the limits dictated by law, the best market practices, and to the best of the knowledge and expertise of the company.

Respect People's Dignity

- The company respects the fundamental rights of people, safeguarding their moral integrity and guaranteeing equality of opportunity. In both internal and external relations, we do not allow behaviour which is discriminatory in nature based on political opinions or affiliations, religion, race, nationality, sex, sexual orientation, state of health and in general any intimate characteristic of a person.

Ethics of Work, Safeguarding and Valuing Associates

Committing to improvement - All associates commit to working with Cassiopea Roma s.r.l. to the best of their professional ability and to improving this with the tools offered by the company.

Confidentiality – Associates commit to treating all information obtained in relation to their involvement in any work project as confidential and, moreover, not to divulge it other than for the purposes of carrying out of the project and respecting the principles of transparency.

Cassiopea Roma srl

Via F. O. da Pennabilli 5, Roma Garbatella 00154
+ 39 06 693 11 289 / info@cassiopearoma.it
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Absence of Conflicts of Interest – Associates guarantee that every business decision is taken in the interests of the Company, avoiding any conflict of interest between personal or familial economic interests and the work undertaken by the company.

Health and Safety - Cassiopea Roma s.r.l encourages a work atmosphere and conditions which protect the psychological and physical wellbeing of the person, and encourages positivity, creativity, active participation, good team work and personal responsibility.

Stakeholders

The stakeholders of Cassiopea Roma s.r.l are all those individual groups comprised of people, organisations, and communities who influence the activities of the Company and suffer directly or indirectly from its affects.

- **Associates:** These are the Sole Director, his employees whom, in various job titles, work in the name of, or on behalf of and in the interests of the Company, independently of how the relationship would be legally defined.
- **Clients:** These are all those who in various guises benefit from the services offered by Cassiopea s.r.l
- **Partners:** All those entities with whom Cassiopea Roma s.r.l has, in various forms, a collaborative relationship aimed at developing services and projects together.
- **Suppliers:** All those whom, in various forms, provide goods, services, and resources necessary for the carrying out of business and which contribute to determining the quality of the services of Cassiopea Roma s.r.l.
- **Financial Entities:** these are the credit institutions whom offer financial support for the investment decisions of Cassiopea Roma s.r.l.
- **Public Administrations:** in the widest sense, these are all those bodies, run privately or publicly, which provide a 'public function or 'public service'. For a 'Public function' we mean business activities governed by the rules of public law and the relevant legislative, administrative and judicial functions characterised by the exercise of authoritative and certifying powers. By 'public service' we mean the business governed in the same way as public functions, but lacking the authoritative or certifying powers typical of the former.

Community

The community signifies the local community with whom Cassiopea Roma s.r.l has a relationship and, in general, the whole of civil society with whom the Company has or could have a trading relationship.

CODE OF CONDUCT

I. Associates

Cassiopea Roma s.r.l protects entrepreneurial risk through a careful policy of safeguarding resilience from the perspective of medium to long-term sustainability, while promoting economic competition and respect for the principles of fairness and transparency.

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The Company observes high standards of good social governance in order to protect its own values and reputation.

Representative and Collaborators – All associates are required to behave with rigour and professional commitment, in order to protect the reputation of the Company, establishing with each new person they speak to, whether internally or externally, relations based on trust and mutual reciprocity.

Associates guarantee, in carrying out of their day-to-day business, to value trustworthiness, efficiency and excellence which distinguishes the style of Cassiopea Roma s.r.l.

Honest and Transparent Conduct – Associates are required to show integrity in their behaviour with regard to the regulations, rules and internal oversight procedures. The conviction that one is acting to the advantage of Cassiopea Roma s.r.l can never, under any circumstances, justify the right to act in contradiction of the principles laid out in this present document, the general observation of which is of fundamental importance for the smooth running and reputation of the Company.

Conflicts of Interest – Conflicts of interest can be proven when an associate from the Company uses his or her own position for personal gain or whenever one of the personal interests enters into a conflict with the interests of Cassiopea s.r.l. What is more, each associate has to avoid any involvement which will interfere, or could interfere, with their own capacity to impartially weigh up decisions on behalf of the company.

Any situation which could constitute or represent even a potential conflict of interest must be promptly communicated to the direct line manager who is obliged to discuss it with the supervisory board for a decision on the case.

Purely for the purposes of example and by no means to be considered an exhaustive list, situations that could generate a potential conflict of interest might include:

- The development, by an associate, of business activities, of any kind involving clients, suppliers, competitors or advisors
- The exercising of a key role in an external supplier, client, competitor or advisors, by a family member of the associate
- Economic or financial interests of the employee and/or their family in business activities of suppliers, clients, competitors or advisors.

Data Handling

Transparency and propriety regarding data: associates must ensure the veracity, transparency, accuracy and completeness of their documentation and of the data gleaned through the carrying out of their role in the business.

Cassiopea Roma s.r.l condemns any behaviour designed to alter the accuracy or veracity of data and of information contained in financial accounts, reports or other social communications provided for by law and addressed to the public or given to regulatory authorities.

Protection and confidentiality of data: associates must guarantee the utmost confidentiality regarding strategic information, other sensitive information or information related to the intellectual property of Cassiopea Roma s.r.l.

The Company guarantees the appropriate handling of sensitive data and asks associates to maintain the utmost discretion regarding any sensitive information belonging to the Company or any third parties.

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Cassiopea Roma s.r.l commits to safeguarding the intellectual property and copyrights of all third parties. All associates contribute to demonstrating this respect for the regulations on intellectual property rights and copyright regulations.

Safeguarding of personal data: the Company will protect all personal data acquired through the carrying out of its business activity in relation to associates and third parties.

The Company treats such data in accordance with current regulations and respecting the moral rights of the individual.

Traceability and propriety in business – all operations and transactions, in the widest sense of the term, must be authorised and carried out with respect for the principles of honesty and impartiality. It is the responsibility of all associates to work with the utmost due diligence and to guarantee that their activities are supported by the appropriate authorising documentation and/or information, not least in order to guarantee the accuracy and legitimacy of the work.

Cassiopea Roma s.r.l encourages the principle of good conduct in all business dealings, including with regard to the type of crime covered by the form of organisation, management and control adopted with regard to art. 231/2001.

Gifts and benefits – Associates cannot ask, either for themselves or for others, even as a go-between, gifts, money or other benefits, nor accept them, except those with minimal value or benefit or which conform to the practical norms of business and courtesy, no matter who it is from or however it might confer benefit to the activities of the company.

Workplace – Cassiopea Roma s.r.l adopts all the security measures required by the evolution of technology in order to guarantee a secure and healthy workplace, fully respecting all the current regulations regarding prevention of and protection from accidents in the workplace.

To this end, the Company carries out technical and organisational interventions concerning the evaluation of risk, the monitoring of working practices and providing training interventions and communications.

Associates of Cassiopea Roma s.r.l are required to demonstrate the most scrupulous respect of the regulations and obligations deriving from the norms of reference when it comes to health and safety, as well as respecting all the measures required by internal operations.

The Company guarantees respect for the conditions necessary to create a collaborative and non-hostile workplace and to prevent discrimination of any kind.

We request everyone's collaboration in maintaining an atmosphere of reciprocal respect for the dignity, honour and reputation of each person.

Selection and hiring of personnel - The selection of staff is conditional on the verification that candidates fully match the professional criteria required. The Requirements of the Role outlined allow objective measures in order to avoid favouritism, nepotism or forms of influence peddling.

II. Clients

Quality and Excellence – Cassiopea Roma s.r.l aims to meet the highest legitimate expectations of its clients, providing services of excellence and quality, in adherence with the norms set out in order to protect competitiveness and the markets.

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Our objective is to always guarantee an immediate, qualified and competent response when it comes to the demands of the Client, ensuring all of our dealings are professional, courteous and collaborative.

Contractual and negotiating propriety – The personal objective of Cassiopea Roma s.r.l is to fully satisfy a client's demands, alongside forming a strong working relationship based on the fundamental values of decency, honesty, efficiency and professionalism.

When it comes to relations with Clients, all Associates of Cassiopea Roma s.r.l commit to working within the regulatory guidelines and always respecting the commitments and obligations taken on, and further commit to truthfulness in their communications, whether in publicity or anything else.

The Company commits to a non-exclusionary policy towards any group; however it is forbidden to have relationships, either directly or indirectly, with persons whom are under suspicion of, or demonstrate that they are, belonging to any criminal organisation or working with unlicensed workers.

The contracts drawn up with a Client, and in general in all communications addressed to them, are written in simple, clear and complete terms, avoiding the use of any misleading practices. In the event of any unforeseen events, the Company commits to not taking advantage of any situations of dependence or vulnerability on the part of others.

III. Partners

Evaluating partners – The Company commits to working with Partners whom have a solid reputation and experience, setting out our relationship with the same with full regard to this Code. All Partners, within the defined framework of the contractual relationship, are required to act with utmost professionalism in addition to following all the legal requirements and those set out in this Code.

Cassiopea Roma s.r.l expect that their partners maintain appropriate conduct at all times, behave with diligence and with respect for the law, with particular regard for the norms and good practice regarding health and safety in the workplace and regarding the environment, in addition to protecting intellectual property rights.

Decency in negotiations – The relationships with Partners are based on appropriate and transparent negotiations, with the aim of preventing any circumstances that could significantly influence the established relationship. In addition to unforeseen circumstances, the Company commits to not taking advantage of situations of dependence or vulnerability on the part of others, and expects the same behaviour from its Associates.

IV. Provision of goods and services

Objective evaluation – The process of selecting Suppliers, based on objective and documented criteria, takes place with full regard for internal processes, regulatory frameworks, the principles of propriety, value for money and quality.

Decency in negotiations and contractual equality – The Company issues contracts to its suppliers in a complete, correct and transparent way, seeking to avoid any situations which could significantly influence the established relationship.

In the event of unforeseen circumstances, the Company commits to not taking advantage of situations of dependence or vulnerability on the part of others and expects its Suppliers to do the same.

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Each Supplier must declare and share the principles laid out in this document and commit to respecting them. The violation of the principles herein laid out constitute a breach of contract, punishable by the cancellation of any relationship.

V. Financial institutions

Transparency and respect for commitments – the Financers are the entities that provide financial support to the investment choices of Cassiopea Roma s.r.l.

The Company guarantees truthfulness and prompt delivery of requested information by financial institutions, so that any investment decision is based on a truthful representation of their financial, assets and economic situation of the same.

When dealing with any finance received, the Company will thoroughly respect the commitments made to any suppliers, strictly respecting any agreed deadlines.

VI. Public Administration

Integrity and independence in relationships – Cassiopea Roma s.r.l bases all its behaviour on principles of legality, propriety and transparency, in order to not lead any Public Administration into violating principles of impartiality and good practice to which it is held.

In order to guarantee the utmost clarity in our relations with institutions, these are conducted solely through the business spokesperson who has been given the necessary powers and who will not find themselves in a position of conflict of interest with regards to the representatives of the institution itself.

Gifts, acts of courtesy or of hospitality towards representatives of Government, Public Officials, and public employees are only permitted to the extent that the low value of the same does not compromise their integrity or independence. In every case this type of expense must be authorised and documented.

The Company condemns any type of behaviour, from any position it might be, which seeks to promote or offer, directly or indirectly, gifts and benefits (money, goods, services, loans, favours or other assistance) to representatives of the Italian or foreign Public Administrations, to their relatives or connections, which could confer any kind of indebtedness and/or advantage.

With regard to relations with Public Administrations, moreover, it is forbidden to alter the functioning of an information or telematic system belonging to the Public Administration itself, manipulate data contained therein in order to obtain an unjust profit or in any other way falsify, alter or omit data and/or information with the purpose of obtaining leverage or other benefit for Cassiopea s.r.l.

Transparency and collaboration – in the event of any investigations or verification checks on the part of the Public Administration, each Associate will be expected to act with transparency and full cooperation. The relationship with the Judicial Authorities and with the Administrative Tribunal will be characterised by utmost collaboration and with full respect for the role of the institution itself. The Associates are responsible for avoiding any behaviour which could be construed as misleading or, even, as attempts at corruption.

It is considered a violation of this Code of Ethics, as well as the law, to induce any person, with violence, threats or with offers or promises of money or other assistance, to not make a declaration or make a false declaration before the Judicial Authority.

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Business negotiations – With regard to any business negotiations or relationship between the Public Administration, there cannot be, for any reason, any behaviour designed to confer on Cassiopea s.r.l any leverage of indebtedness and/or other advantage.

By way of example, either directly or indirectly, the following behaviour is forbidden:

- To propose, in any way at all, the opportunity of employment and/or business which could confer advantage to the Public Official, those dealing with Public Services or their friends and relatives.
- To offer gifts, if they are not very modest in nature and are respecting the authorised business practices.
- To solicit or obtain confidential information which could compromise the integrity or reputation of either party.
- To carry out any action aimed at compelling the staff of the Public Administration to do or omit to do something in violation of the regulations.
- To abuse ones position or power to pressure or force someone to be indebted to you or someone else for money or other benefits.

Public Finances - It is prohibited to use any contributions, subsidies or loans granted by the European Community, the State or any other public body, for any purpose other than that for which they have been granted.

The Company condemns any behaviour aimed at obtaining any kind of contribution, loan, soft loan or other financial assistance of the same kind from a Public Institution, by means of false declarations and/or falsified or altered documents, through omitting information or, more broadly, by means of artifice and deception, including those carried out by means of an IT or telematic system aimed at misleading the provider.

VII. Community

Protection of the environment – The Company promotes respect for the laws and regulations designed to protect the environment. Beyond a fundamental respect for the law, Cassiopea Roma s.r.l encourages the politics and behaviour of environmental sustainability from its employees, external collaborators, suppliers and clients.

Legal competition – Cassiopea Roma s.r.l recognises the value of free, fair and legal competition. For which reason, the Associates of the Company are required to observe all current legislation. It is forbidden to obtain information about our competitors through illicit or unethical means.

Mass Media – all data and information relating to the Company and addressed to mass media can be divulged only by the corporate functionaries appointed to do so or with their authorisation. In every case, the external communication must be complete, truthful, and not misleading.

It is forbidden to use any form of pressure over the means of communication in order to exert favourable coverage from the same, nor to use any form of misleading advertising.

Sponsorship and contributions – Cassiopea Roma s.r.l commits to contributing, as much as possible, to supporting social initiatives which agree to promote the values and principles of the Company. For any eventual donations and concessions granted, the Company favours initiatives that offer guaranteed quality and which distinguish themselves by the ethical messages they deliver.

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