CODE OF CONDUCT

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1. INTRODUCTION

Mar.Ga. group has been providing since 2008 integrated Facility Management services for commercial and industrial buildings, designing and implementing managerial and operational process, always focused on exceeding customer's expectations.

Honesty, transparency, commercial fair play, respect for others, attention to the customer's needs, social responsibility are fundamental values in the corporate culture that Mar.Ga. has always spread to all levels of its workforce.

This identity, initially dictated by the entrepreneurial spirit of the founders and then strengthened following the development of the company, has become a fundamental peculiarity of the company as well as a distinctive element of recognition much appreciated by all customers.

A milestone of the Group for sharing corporate principles is this Code of Conduct.

2. GENERAL PRINCIPLES

Mar.Ga group pursues its business objectives in respect of people (employees, customers, suppliers), environment, regulations and laws, a value that fully guides every daily activity and every decision-making process. The sharing and application of the values gathered by this Code of Conduct are a sine-qua-non condition for every employee, collaborator, consultant or partner, whose conduct is based on the principles of legality, correctness, non-discrimination, and loyalty.

2.1. LEGALITY AND TRANSPARENCY

The companies of the Group they all operate in compliance with the law and with what is indicated in this Code of Conduct. Each employee action is required to comply with all applicable regulations and is required to be up to date with their knowledge through the participation of training and courses offered by the company.

2.2. CORRECTNESS

Correctness and moral integrity are two essential values for every employee or collaborator of Mar.ga. Every relationship with third parties must have the achievement of corporate objectives as its goal without establishing any privileged relationship or obtaining its own advantages.

All forms of gifts, personal favours, donations or benefits of any kind are therefore prohibited and, in general, it is not permitted to accept any counterpart intended to grant advantages to third parties.

Each employee or collaborator must also prevent and avoid any activity that could constitute a conflict of interest. If a potential conflict of interest is identified, employees are required to immediately inform their hierarchical superior or the General Management so that the company can analyse, and possibly authorise, the potentially conflicting activity.

In the event of a violation, the company will immediately interrupt the emerging conflict of interest, reserving the right to proceed legally for its own protection.

2.3. NON-DISCRIMINATION

In the selection and management of personnel, in daily relations, in internal regulations, in company organisation, in the choice of suppliers, in the relationship with customers, the companies of Mar.Ga. Group reject all forms of discrimination relating, by way of example but not exhaustively, to age, gender, political view, sexual orientation, state of health, religion, culture and nationality. Mar.Ga. Group also promotes integration between people and stimulates dialogue and the protection of everyone's rights.

2.4. CONFIDENTIALITY

The companies part of Mar.Ga. Group comply with the regulations in force regarding the protection of personal data and the guarantee of confidentiality. Each employee or collaborator is required to use any confidential information acquired in the course of their duties exclusively to perform their work in the best possible way, thus excluding personal purposes unrelated to this activity.

2.5. LOYALTY

The companies part of Mar.Ga. Group undertake and promote fair, respectful and correct competitive relationships, in compliance with current competition legislation, in the awareness that virtuous competition, transparent relations and compliance with the law are fundamental elements for the development of the business in favour of consumer interests and of the community.

3. EMPLOYEES AND COLLABORATORS

Personnel selection takes place according to principles of correctness and transparency, respecting equal opportunities, ensuring candidates a selection process that uses objective and meritocratic criteria with the sole objective of combining company needs in the best possible way with experience, know-how, the expectations and ambitions of the candidates themselves.

Mar. Ga. tries in every way to exploit all its human resources, offering initial training, periodic and constant updates, opportunities for professional growth.

Mar. Ga. ensures that no episode of mobbing, psychological pressure, stalking, or discriminatory behaviour will be allowed, but rather will be severely prosecuted, opposed and stopped in the bud.

Relations between colleagues or collaborators will also be carefully checked to ensure mutual respect and loyalty in order to guarantee a serene, constructive and stimulating work environment.

4. WORKING ENVIRONMENT

The companies part of Mar.Ga. Group assure their employees and collaborators a healthy, safe, pleasant working environment that respects the individual dignity of workers.

Safety in the workplace is ensured both by rigorously implementation of procedures in line with the law in force and through the design of workspaces carried out by qualified professionals. It also provides for the management of waste deriving from work and construction sites according to the provisions of the law, entrusting certified companies with collection and disposal.

Mar.ga. it also protects the health of its employees and collaborators by ensuring compliance with hygiene standards and health prevention through daily office cleaning programs and periodic sanitisation carried out by qualified companies

5. SUSTAINABILITY

The Mar.Ga. Group undertakes to study and introduce concrete actions in favour of the environmental sustainability of the business. In particular, pay attention to the following factors:

• WATER:

- drastic reduction in water consumption thanks to the adoption of "water saving" devices
- artificial lawns instead of natural ones in all offices in order to avoid water consumption for irrigation.
- ENERGY:
- adoption of photovoltaic panels in the main office able to support the needs of our companies
- Replacement of all light fixtures with LED versions
- Adoption of "PIR" sensors for turning lights on and off automatically
- Office cleaning procedures that avoid waste of water and energy
- New low consumption air conditioning and heating system

• WASTE:

• adoption of bins suitable for differentiated collection and relative instructions to personnel

- Use of recyclable packaging material
- Promoting waste management best practices among all customers

6. BUSINESS MANAGEMENT

The companies of the Mar.Ga. Group they have a formal system of managerial and operational procedures capable of defining and controlling each company process. The organization is designed to facilitate compliance with this management system. Employees and collaborators are required to comply with the procedures and must act in compliance with their authorization profiles. They must also guarantee the backward traceability of each activity carried out on behalf of the company.

In particular, in the accounting/administrative management each employee and collaborator is required to act in compliance with the principles of confidentiality, transparency, accuracy, truthfulness so that the company can always count on reliable and real data in order to allow the Management to correctly plan the own strategies and operational plans.

In addition, employees and collaborators are trained to ensure the correct use of company assets as well as their rationalization in daily use. They are also informed about the danger of intrusions into corporate computer systems and have been trained to prevent the risk.

7. RELATIONSHIP WITH CUSTOMERS

Central focus for Mar.Ga. it is attention to customers, listening to their needs, rapid analysis of needs and formulation of solutions, activities aimed at total customer satisfaction by exceeding their expectations.

Mar. Ga. provides its customers with a dedicated organization, flow of codified information and modern and effective communication tools designed to simplify the exchange of information, whether requests, clarifications or complaints.

Employees and collaborators are trained and updated on how to interact with customers, ensuring polite, courteous, rapid and effective interaction. Each operations manager who works for customers has precise objectives of punctuality and effectiveness of interventions, having at their disposal IT systems and tools capable of providing real-time performance statistics for each intervention and each customer.

8. SUPPLY CHAIN CONTROL AND RELATIONSHIP WITH SUPPLIERS

In addition to what has already been indicated in point 2.2, the relationship with suppliers is based on fairness and transparency.

The choice of suppliers is made on the basis of objective criteria of economy, opportunity and efficiency. The choice of suppliers on purely subjective and personal grounds or, in any case, by virtue of conflicting interests with those of the company is precluded.

In the selection or renewal of suppliers, a check is also envisaged on their effective adherence to and compliance with the fundamental ethical principles referred to in this Code of Conduct.

9. INTERNAL CONTROL

Each manager or supervisor is responsible for supervising compliance with the provisions indicated in this Code of Conduct.

The Company Management is responsible for adopting tools aimed at mitigating any corporate risk, in order to guarantee compliance with the laws in force and with the internal management and operating procedures.

Every employee or collaborator has the duty to report to their direct superior any circumstance potentially in conflict with the principles and provisions of this Code of Ethics.

Each violation objectively verified and detected will be sanctioned through the adoption of adequate and proportionate disciplinary measures.