

SIM-PATIA

CODE OF ETHICS AND CONDUCT PURSUANT TO LEGISLATIVE DECREE 231/2001



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1 . PREMISE

Sim-patia Cooperative Company has a precise mission defined by its Articles of Association as follows:

The Cooperative pursues its statutory purposes through the coordination of the physical, material, and moral resources of the members and third parties who, for whatever reason, participate in the various forms of activity and management of the Cooperative.

The Cooperative has as its object:

- the management of socio-health and educational services aimed at the recovery and human, moral, cultural, professional, and religious qualification of people with disabilities.

The cooperative, therefore, in compliance with the mutuality clauses, has as its object the carrying out of the following activities in favor of its members:

- management of rehabilitation, reception, animation, and assistance services; accommodation and therapeutic communities; coexistence communities, in the forms and ways deemed useful for achieving the social purpose;

- provision, to a non-prevalent extent, of services to individuals, businesses, and non-businesses, and in particular to public bodies, such as municipalities, provinces, and regions, local health authorities, mountain communities, and radio and television broadcasters.

The social relevance of the activities carried out, together with the objective of satisfying the legitimate needs and expectations of Guests, Users, people who work in "**Sim-patia**" or who collaborate with it, as well as other bearers of general interests, determine the need to clearly define and explain their rights and duties.

"**Sim-patia**," within the regional network of social and social-health supply units, lives and acts in a social fabric that includes various subjects, many of whom are attentive to the action of health and social-health operators.

The more or less ethical actions and behaviors of a social cooperative refer to all citizens who no longer consider abstract declarations sufficient but require constant commitment, which derives from a precise and punctual system of organization.

The Code of Ethics:

- constitutes an important tool for the implementation of Social Responsibility policies and establishes the rules of behavior that the recipients must comply with in compliance with the values and Ethical Principles set forth by the Laws and Regulations of the Italian Republic.
- fully enters the Company's legal system and represents the set of moral rights and duties and the consequent ethical and social responsibility of each participant in the organization.
- has the further objective of certifying the prevention of irresponsible and/or illegal behavior by those who work in the name and on behalf of the Company because it defines the scope of ethical and social responsibilities of all operators.
- does not replace and does not overlap with external and internal legislative and regulatory provisions, but in the action of integration and strengthening of the principles contained in these sources, it introduces organizational and behavioral models aimed at preventing and hindering "criminal" conduct or conduct that leads to advantages.
- it is a tool for improving the quality of services as it encourages conduct consistent with the principles and rules contained therein, as well as a communication tool for all members of the organization, while at the same time allowing external stakeholders to know the guiding principles of the Company, and therefore the possibility of requesting a more punctual implementation.

1.1. History

*The **Sim-Patia** cooperative was founded on February 23, 1989, by a group of friends who experienced firsthand the difficulties of handicap with the aim of **creating structures suitable for offering temporary or permanent residence to adults with serious or very serious limitations in their functional autonomy and unable to remain in their family unit.***

The first president of the cooperative was Alberto Boschi, to whom Don Renzo Scapolo, parish priest of Valmorea, signaled the possibility of buying the Simpathy, a hotel and disco near the town of Valmorea, whose name (from the Greek sum-phateia, i.e., with affection, with love) was adopted for the project.

The first supporters of the Valmorea initiative were the Pivejs of 1939, class of the Stecca di Como, who chose this project as a commitment on the occasion of the 50th, and Rita Levi Montalcini. The purchase of the building was made possible through a subscription opened by "La Provincia", a Como newspaper, in 1990.

*With the help of an important loan from the Lombardy region (FRISL, Lombardy Healthcare Infrastructure Restructuring Fund), the renovation and expansion were completed based on a project by the architect Rosalba Giani, president of the cooperative from 1989 to 1994. In all these years, **Sim-patia** has continued to be supported by numerous individuals, companies, institutions, and associations, including Soroptimist International, the Cariplo Foundation, Rotary, and the Foundation of the Communities of the Province of Como.*

*Thanks to the activity of the Amici di **Sim-patia** Association, the project is disseminated and becomes increasingly better known, and the resources are collected continuously.*

***Sim-Patia** was inaugurated on September 20, 1999.*

Sim-patia today manages:

- The RSD "**Sim-patia**," located in Valmorea, Via Parini, 180, - accredited for 28 beds;
- The CCD "**Sim-patia**" combined with the RSD - accredited for 18 places;
- The therapeutic pool inside the structure in Via Parini, 180, which is open to the local area;
- The "Questio" accredited Research Center and the Technological Pole for the research of technological solutions to support fragility, open to the territory, to the Lombardy Region, and to all those who request them in Italy.

1.2. Mission

Sim-patia: "able to live" is the mission that **Sim-patia** has been carrying out for years.

The cooperative works to create the conditions that guarantee the disabled person a future as a protagonist as much as possible, intervening to reduce his handicap and promote his autonomy, to allow all those who find themselves in this situation to accept the change in their physical condition as a situation that does not prejudice the possibility of living one's life to the fullest but rather requires the acquisition of new skills to achieve this result.

Sim-patia's belief is that with disability, life changes, but it doesn't end.

Sim-patia: a place of opportunity where guests are encouraged to enhance their potential and residual abilities even in highly compromised situations, with the aim of communicating, developing motor autonomy, and self-determination in daily life.

Sim-patia: place of technological solutions: today, technologies with specific aids and instruments make it possible to find solutions to individual problems, in particular for communication, the management of wheelchairs, and the governance of the environment (home automation).

Sim-patia makes use of national and foreign collaborations that allow the recovery of specialized technologies to be put at the service of the individual needs of the disabled person.

The variables of materials and technologies given by the different disabilities have allowed **Sim-patia** to reach levels of quality recognized also abroad.

Sim-patia open place: to news; participation in national and international events for the search for innovations in the sector of personal care, aids, and organizational models; comparison and new relationships with centers of excellence.

To non-guests with disabilities: we offer consultancy for the most appropriate solutions for specific motor, cognitive, and communication needs.

To the local area: through the use of the therapeutic swimming pool, consultancy, events that bring interest within **Sim-patia**, and collaboration with the Olgiatese Service Consortium.

1.3. The regulatory conditions

The regulatory conditions mentioned in relation to 231 obligations are:

The Legislative Decree n. 231 of June 8, 2001, containing the "Regulation of the administrative liability of legal persons, companies, and associations, including those without legal personality", introduced into the Italian legal system a regime of direct administrative liability for Entities in cases where natural persons who hold representation, administration, and management functions, or subjects subject to their supervision and control, commit certain crimes for the benefit or in the interest of the entities themselves. The extension of liability aims to involve the assets of the companies and, ultimately, the economic interests of the shareholders in the punishment of certain criminal offenses, who, until the entry into force of this law, did not suffer consequences from the commission of the crimes committed, to the benefit of the company itself, by directors and/or employees. This new liability arises only on the occasion of the commission of certain types of crimes, specifically indicated by the law, by subjects linked in various capacities to the company, and only on the hypothesis that the illicit conduct was carried out in its interest or to its advantage.

The Entity's liability is thus added to that of the natural person who materially committed the offense; the exclusion of the entity's liability is envisaged if it demonstrates (articles 6 and 7 of the aforementioned Legislative Decree):

- to "have adopted and effectively implemented before the commission of the act organization and management models suitable for preventing the offense";

- to "supervise the functioning and observance of the organization and management models suitable for preventing the offense."

In particular, the preparation of the models envisaged by Legislative Decree 231/2001 must take place at the same time as the adoption of a disciplinary system suitable for sanctioning violations of the code itself.

Among the offenses indicated by the legislation, also in relation to the provisions of the Guidelines drawn up by Confcommercio, only a few cases were considered conceivable for the sector covered by the activity of "**Sim-patia**", for which the specific risks associated with company operations therefore define the rules of conduct to be adopted. In other cases, it was considered that the hypothesis of crime was completely abstract, but it was still considered correct, and in line with the value system of "**Sim-patia**," this Code addresses the need to adopt in any case a conduct appropriate to the reputation of the entity. Finally, some cases have not been taken into consideration as the organizational and/or corporate structure details for the commission of these crimes do not exist.

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The same Decree also provides for the exclusion of the company's liability if it proves, among other things, that it has adopted and effectively implemented, before the commission of the crime, an "organizational, management, and control model" suitable for preventing crimes of the type that occurred and has entrusted the task of supervising the functioning and observance of the Model, as well as taking care of its updating, to an internal "body" ("Supervisory Body") with independent powers of initiative and check. Compliance with the Organisational, Management, and Control Model also becomes an essential part of the employment or collaboration relationship. In light of the above, the C.D.A. approved an "organization, management, and control model", set up a Supervisory Body, and prepared this "Code of Ethics and Conduct". This Code of Ethics and Conduct contains a series of principles that "**Sim-patia**" recognizes as its own and on which it intends to request the observance of all those who contribute to the pursuit of the institution's goals, even beyond the specific provisions of Legislative Decree 231/2001 and therefore regardless of whether the entity derives an interest or an advantage.

The organization intends to adopt a "Code of Ethics of Conduct" with the aim of providing general guidelines of an ethical behavioral nature to employees, partners/collaborators, with which they will have to comply in the execution of their activities, as well as to try to contribute to the prevention of the commission of the offenses, as a consequence of the offenses envisaged by Legislative Decree No. 231/2001.

PSSR 2010-2014, which introduces the issue of compliance with Legislative Decree 231. In particular, it is underlined:

"During the 9th legislature, without prejudice to an appropriate differentiation between health services and social health services, on the basis of the complexity of the services and the intensity of care, the organizational models and the ethical-behavioral codes will be extended to the ASPs and to the managers of the most important Healthcare Residences for the Elderly (RSA) by December 31, 2012."

2 . GENERAL PRINCIPLES

2.1 Scope of Application

The Code of Ethics and Conduct is the set of values, principles, and lines of behavior that must inspire the members of the BoD, the Management, employees and collaborators (hereinafter collaborators), suppliers, volunteers, partners, and, more generally, all third parties who come into contact with "**Sim-patia**" in the context of their work and all those who directly or indirectly, permanently or temporarily, establish relationships or operate in the interest of the same.

The Code of Ethics defines the principles, values, and fundamental management rules of the entire organization and daily operations and constitutes a guideline in economic, financial, social, and relational relations, with particular attention to issues of conflicts of interest, relationships with the competition, relations with customers, suppliers, the Public Administration, and Local Authorities.

It applies to all company activities carried out and constitutes an essential control tool for the purposes of assessing the effectiveness of the Organizational Model.

In carrying out the activity and in managing relations with external parties, everyone must comply with the utmost diligence, honesty, loyalty, and professional rigor, in scrupulous observance of the laws, procedures, and company regulations, and in compliance with the Code of Ethics and Conduct, avoiding in any way any situation of conflict of interest, as well as avoiding submitting one's specific activities to purposes or logics different from those established by the company itself.

2.2 Basic values system

The "**Sim-patia**" Code of Ethics is based on the principles of:

- *Compliance with regulations*: "**Sim-patia**" pursues objectives in compliance with the Italian Constitution and current regulations, with particular reference to those concerning the regulation of the functioning of residential facilities for the disabled;
- *Honesty*: all the subjects involved in the provision of the service undertake to implement behaviors that promote the well-being of the client and the development of the organization, avoiding actions, albeit formally legitimate, that may conflict with the principles established by the Code of Ethics;
- *Impartiality*: the organization rejects and excludes any discrimination based on sex, health status, nationality, race, religious beliefs, political opinions, and different lifestyles and undertakes to ensure that this principle is respected by all its employees and collaborators, at any level in relations with Users, provided that they do not conflict with the rules of coexistence or public order;
- *Confidentiality*: "**Sim-patia**" ensures that the information in its possession is treated confidentially and for reasons strictly related to the provision of the service;
- *Respect for the environment*: the organization recognizes the environment as a fundamental constituent element for the pursuit of the condition of well-being of the patient and, to this end, endeavors to avoid, in any way, disfigurement or pollution;
- *Respect for the person*: respecting the person means ensuring methods and levels of health care interventions that come as close as possible to the qualitative criteria desired by the patient himself and, at the same time, that respect the principles and canons of best practices. Between the strictly "health" dimension and that of "quality of life", "**Sim-patia**" has decided to pursue the latter primarily,

reserving, as much as possible, the decision on the type of intervention to which it wants to be subjected by the Guest subjected. The work of the various professionals is, however, always governed and conditioned by current legislation.

- *Involvement*: the Code of Ethics and the relative relational and operational methods inscribed therein assume the important function of encouraging the constructive involvement of the user, his family, and operators;
- *Teamwork*: being and feeling part of a group is a right and a duty for every operator. The results that can be achieved in a group are generally better than those achieved individually.

Everyone must be able to participate professionally in the activities and in the welfare and organizational-productive projects;

- *Efficiency*: the results must be pursued through the optimal use of resources. In this sense, adequacy is dictated by the strategic guidelines provided by the Board of Directors and by the budget for the year.
- *Transparency*: "**Sim-patia**" undertakes to maintain transparency and certainty in the identification of roles and recipients, so that an effect of de-responsibility is not produced and the identification, for each process, of the responsible subject is guaranteed. Furthermore, the company system guarantees the traceability of every economic and financial operation.

2.3 Guarantors for the implementation of the Code of Ethics and Conduct

The Supervisory Body is responsible for the complete observance and interpretation of the Code of Ethics and Conduct. Personnel may report any requests for clarification or possible non-compliance with the Code to their direct managers or to the Supervisory Body (odv@sim-patia.it). All requests will be given a prompt response without there being, for those who made the report, any risk of suffering any form, even indirect, of retaliation.

With regard to the Code of Ethics and Conduct, the Supervisory Body will meet whenever deemed necessary and will ensure:

- the diffusion of the Code of Ethics and Conduct among the staff and in general among all third parties who come into contact with the organization in the context of the development of the entity's activities;
- support in the interpretation and implementation of the Code of Ethics and Conduct, as well as its updating;
- the assessment of any cases of violation of the rules, providing for the adoption of the appropriate measures in the event of an infringement, in collaboration with the competent corporate functions, in compliance with the laws, regulations, and employment contracts;
- that no one can be subjected to pressure or interference for reporting behavior that does not comply with the Code of Ethics and Conduct.

2.4 Obligations for personnel in relation to the Code of Ethics and Conduct

Each collaborator is obliged to:

- to set an example for one's colleagues (employees and non-employees, internal and external) with one's own behavior;
- promote compliance with the rules of the Code of Ethics and Conduct;
- operate so that one's colleagues and collaborators understand that compliance with the rules of the Code of Ethics and Conduct is an essential part of one's work.

"**Sim-patia**" promotes a systematic action of information regarding the crimes and risks contemplated by Legislative Decree 231/2001, and therefore the personnel must responsibly know the potentially permissible types of crime, respect the company procedures that prevent their onset, and adopt proactive behaviors in line with this Code to avoid incurring any of the types of offense contemplated.

2.5 Risk analysis

Therefore, the risk assessment aims to identify sensitivities in the processes not only relating to the commission of crimes, but also to prevent malpractice phenomena that affect the quality of the service. To this end it is necessary:

- check the production processes of "**Sim-patia**";
- identify the key subjects for each individual process;
- analyze procedures and practices;
- identify the areas of risk, to verify in which company sector it is possible to commit defaults or improprieties;
- set up a control system capable of preventing the risks of carrying out the aforementioned.

2.5.1 Critical processes

The factors that, more than others, contribute to making a process critical from an ethical point of view are:

- the nature of the professional activities carried out therein;
- the intensity of interpersonal relationships;

- the simultaneous production and use of the service by the User;
- discretion in providing the service.

The above can be seen in particular in the nursing, rehabilitative, social welfare, educational, and entertainment functions. In fact, in these activities, the operator lives on continuous interactions in which discretion is strong in the way the activity is performed, which is based both on technical specifications and also on relational practices. In fact, there is much personal information about the guest used by the operators assigned to carry out the activity, which corresponds, on the other hand, to the difficulty of direct control by the hierarchical superiors caused by the simultaneity between production and provision of the service. From this, it can be deduced how delicate the Management function is and what level of professionalism is required in order not to fall into improprieties, defaults, or errors.

The key and critical figures for the prevention of ethical and behavioral offenses are represented by the following:

- Direction.
- Doctors;
- Nurses;
- Rehabilitation therapists;
- Educators
- Computer engineer;
- SAA/OSS;
- Administrative.
- Generic service personnel

3. PRINCIPLES RELATING TO OPERATIONS, TRANSACTIONS AND RECORDS

The given approach tends to ensure that the relevant operations and transactions are highlighted in the context of the description of the processes and that each of them is carried out by authorized personnel (it being possible to infer this authorization from procedures, attributions of powers, and job descriptions) in compliance with the traceability requirement.

In the management of accounting activities, "**Sim-patia**" undertakes, through each of its collaborators, to observe the rules of correct, complete, and transparent accounting according to the accounting criteria and principles adopted in compliance with the provisions of the law. When accounting for the facts relating to management, collaborators are required to comply with internal procedures so that each operation is not only correctly recorded but also authorized, verifiable, legitimate, consistent, and congruous. In particular, these

assumptions are applied to the following types of services:

- Rate services: in services remunerated by the Public Administration with the application of predetermined flat-rate rates, the provision of all interventions required by current regulations or agreed upon in specific agreements must be ensured. The Responsible Directors and the Departments of the Supply Units ensure the implementation, in the treatment protocols and internal procedures, of the constraints on the provision of services imposed by the Law or by the provisions of the Health Authorities;
- Reported services: in the case of services or research financed by the Public Administration, or by other entities, or private individuals, on the basis of the actual costs incurred, the forecast of the total cost must be made on the basis of reasonable and reliable calculations. The reporting must be made on the basis of the actual costs and charges incurred. The reports made to the Public Administration, accompanied by all the supporting elements, must be kept in the records. The reports must be drawn up by someone other than the one who prepared the estimate.
- Presentation and invoicing of services: all those who, for whatever reason, carry out their activity at "**Sim-patia**", undertake, within the limits of their respective competences, as determined by the C.C.N.L. of competence, by the National Agreement for freelance doctors, by contracts with professional associations or individual health professionals, and by the Internal Regulations, to operate to comply with the provisions regarding the financing of health, social-health, and social-welfare activities, research, and training.

Personnel are required to act with transparency towards the members of the Supervisory Body and any others in charge of auditing activities and to provide them with maximum collaboration in carrying out their respective verification and control activities. Each employee is required to collaborate so that management events are represented correctly and promptly in the accounts.

For each operation, adequate supporting documentation of the activity carried out is kept in the records in order to allow easy accounting entry as well as accurate reconstruction of the operation and to reduce the probability of errors of interpretation. The will of "**Sim-patia**" is to affirm that powers conferred and responsibilities attributed cannot in any case disregard compliance with the operating rules of the organization, with which everyone must comply for the purposes of their own competence. In this context, it is emphasized that every person who takes part in the "**Sim-patia**" activities can and must present improvement proposals aimed at clarifying company operations more and more so that they increasingly respond to a general principle of transparency and correctness.

4. INFORMATION AND DATA MANAGEMENT

4.1 General rules

The activities of "**Sim-patia**" constantly require the acquisition, storage, treatment, communication, and dissemination of data, documents, and information relating to procedures, operations, and contracts.

The "**Sim-patia**" databases may also contain personal data protected by privacy protection legislation, data that cannot be disclosed externally, and finally, data whose disclosure could cause damage to "**Sim-patia**."

All internal and external collaborators are required to protect the confidentiality of the information acquired due to their job function and, in particular, to observe the confidentiality clauses required by the counterparties. All information, data, and knowledge acquired, processed, and managed by collaborators in the exercise of their work activities belong to "**Sim-patia**" and must remain strictly confidential and suitably protected. They cannot be used, communicated, or disclosed, either internally or externally, except in compliance with current legislation and company procedures.

Each collaborator must, therefore:

- acquire and process only the data necessary and directly connected to its functions;
- store said data in such a way as to prevent unrelated third parties from gaining knowledge of it;
- communicate and disclose the data only within the framework of the established procedures or with the prior authorization of the person delegated to do so;
- ensure that there are no constraints on confidentiality by virtue of relationships of any kind with third parties.

The management of information and documents not in the public domain (suitable, if made public, to influence public opinion or to have an impact on the activities of "**Sim-patia**" or information and documents concerning products, brands, suppliers, development projects, and the organization of "**Sim-patia**" activities) must be carried out according to the applicable procedures in compliance with the law.

The data and information collected as part of the performance of the activities are processed by "**Sim-patia**" in compliance with current regulations and in accordance with what is defined in the Security Policy Document.

"**Sim-patia**" has adopted and applies the contents of Legislative Decree 196/2003 regarding the protection of personal data.

In particular, note the obligation to keep and periodically change the access authorizations to the corporate

information system.

4.2 Use of software in relations with the Public Administration

Software programs intended for interaction with external institutions are subject to particular attention with regard to authorizations for use. The Management defines the access criteria, the limits of use, and the regulation of critical activities with the service providers. Under no circumstances should users communicate their login credentials to third parties. In any case, incorrect use of these programs is prohibited. In particular, it is absolutely forbidden to carry out unlawful operations by exploiting particular personal skills and/or weaknesses of the software programs to which you have access.

As part of the normal performance of training activities, the correct use of the software and compliance with the related regulations are essential. No one is authorized to enter information or data other than those actually available, even if deemed irrelevant, useful, or necessary.

The same criteria apply to software dedicated to the economic reporting of the activities performed, regardless of the contractual position of the collaborator who carries out these activities.

5. RELATIONS WITH THIRD PARTIES

5.1 General rules

In relations with third parties, collaborators are required to behave ethically and in compliance with the law, based on maximum transparency, clarity, correctness, efficiency, and fairness. For this reason, "**Sim-patia**" condemns any criminal practice that may occur against people and the assets of others, ensuring that any type of involvement can be avoided, as far as possible, even the involuntary and indirect ones of the entity in the commission of this type of crime. In this context, "**Sim-patia**" invites all collaborators to report to the Supervisory Body (odv@sim-patia.it) or to their superiors or company representatives any situation in relations with third parties potentially at risk from the point of view of the commission of crimes.

In commercial or promotional relationships, illegal, collusive practices and behaviors, illicit payments, attempts at corruption, and favoritism are prohibited. Direct solicitations or through third parties are not permitted, aimed at obtaining personal advantages for oneself or for others, and conflicts of interest between personal and family economic activities and the duties, functions, assignments, and projects carried out within the structure to which they belong must be avoided. The acquisition of information relating to third parties from public or private sources through specialized bodies and/or organizations must be implemented by lawful means in

compliance with the laws in force. Collaborators are not allowed to receive and use confidential data and information received from third parties without "**Sim-patia**" having received authorization from the third parties themselves for the use of such information. In any case, the processing of data is permitted only within the limits established by the instructions received for one's role as a person in charge.

As part of the execution of the activities, each collaborator, at any level and for the parts of their competence, must guarantee the correct reporting of the activities carried out both directly and through suppliers and/or other collaborators coordinated by them. The relevant registration documents must be filled out carefully. For no reason, even if apparently for a good purpose, is the commission of forgeries allowed.

In particular, false data cannot be entered, data previously entered cannot be altered, and registration documents cannot be filled in and/or signed in place of other persons. Any errors in the attribution must be reported in advance as non-compliance to the contact persons and subsequently corrected by giving evidence of this correction (use of different colored pens, side notes, etc.). In particular, we point out the need to scrupulously follow the rules for compiling and signing the registers and other documents that are formally used for reporting purposes with regard to the lenders.

Company procedures define the responsibilities and signatory powers on a case-by-case basis, and everyone is obliged to comply with these responsibilities and powers. Finally, we recall what has already been provided for in the previous chapter on the use of information systems.

Any attempted violation or instigation to violate the aforementioned provisions must be immediately reported to the company contact person or directly to the Supervisory Body. "**Sim-patia**" does not tolerate any kind of corruption against public officials or any other party connected to or connected with public employees in any form or way. "**Sim-patia**" intends to base relations with other companies and entities on compliance with the rules of competition and the market, according to fairness and good faith.

5.2 Relations with suppliers of products and services

In relations with suppliers of products and services (hereinafter generically referred to as "suppliers"), the internal procedures for the selection, qualification, and management of relations must be observed. "**Sim-patia**" is inspired in relations with suppliers by the principles of correctness and good faith, as well as by compliance with the rules of competition and the market. In this context, collaborators, in any capacity responsible for relations with suppliers, must operate in compliance with predefined requirements and be evaluated in objective, impartial, and transparent terms, avoiding any logic motivated by favoritism or dictated by the certainty or hope of obtaining advantages, also with reference to situations unrelated to the supply relationship per se or for "**Sim-patia**".

Collaborators must avoid any situation of potential conflict of interest with regard to suppliers by notifying their contact person or the Supervisory Body of the existence or occurrence of such situations.

In particular, the selection of suppliers, as well as the formulation of the conditions for the purchase of goods and services and the definition of professional rates, are dictated by the values and parameters of competition, objectivity, correctness, impartiality, fairness, price, quality of the goods and services, guarantees of assistance, and, in general, an accurate and precise evaluation of the offer. In choosing suppliers, undue pressure is not allowed or accepted, such as to favor one subject rather than another.

The activation of a supply must always be preceded by a careful evaluation of the market, with the possible consequent acquisition of more offers. The purchase of goods whose origin is not known and the presence of the relevant tax and guarantee documents cannot be taken into consideration in any way.

Favoritism in payments to suppliers is not permitted, and, more generally, actions that jeopardize their status as creditors cannot be implemented. The types of contracts must be consistent with the type of product and service purchased. Contractual forms that may in some way represent elusive characteristics with respect to labor law regulations are not permitted.

In relations with suppliers, it is not permitted to give or receive in any form, direct or indirect, offers of money or gifts aimed at obtaining real or apparent advantages of various kinds (e.g., economic benefits, favors, recommendations). This prohibition has general validity in the sense that it must also be considered extended to individual initiatives using one's own money and assets or those of the family unit. In any case, acts of commercial courtesy must never be performed in circumstances such as to give rise to suspicions of illegality and compromise the corporate image.

5.3 Relations with Guests, Users and Family Members

"**Sim-patia**" pursues the goal of fully satisfying the expectations of its stakeholders. Therefore, it requires from collaborators and, in general, from the recipients of the Code of Ethics and Conduct and from those who operate in various capacities in the name and on behalf of "**Sim-patia**", that every relationship and contact with and between these subjects is based on honesty, professional correctness, and transparency.

In compliance with current regulations and the general ethical principles set out above, "**Sim-patia**" pursues attention to the needs of Guests and Users, guarantees adequate quality standards of the activities and services offered, and undertakes to respect, throughout all the organizational processes relating to the "Personal Service", the following rules:

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- Centrality of relationship and listening: undertakes to promote a relationship with Guests, Users, and their relatives based on direct relationship and listening to needs;
- Respect for individual values: undertakes to respect the individuality of each person, recognizing their needs and carrying out the appropriate interventions with reference to all the parameters of their quality of life;
- Equity of benefits and conditions: undertakes to:
 - ensure the right to receive appropriate services and respectful, courteous, and professional behavior with respect for human dignity, cultural values, ethical and religious beliefs, gender, sexual orientation, ethnicity, nationality, political affiliation, age, and health conditions, excluding any unjustified difference in treatment;
 - guarantee the uniformity of the economic conditions applied to all Guests and Users, excluding the application of better treatment for reasons related to personalities and patronage;
- Information: undertakes to guarantee complete, truthful, and clear information to those entitled, both on the methods of accessing the service and on the psycho-physical state of Guests and Users, and to provide this information in a language that is understandable and appropriate to the knowledge of the interlocutors;
- Service quality: in order to develop a relationship based on the centrality of the relationship and on listening to needs, it undertakes to periodically analyze the satisfaction of Guests and Users, monitor the quality of the service, and manage complaints objectively and transparently;
- Right to submit complaints: undertakes to guarantee the possibility of submitting observations and complaints by Guests, Users, family members, and other "stakeholders," guaranteeing adequate response times and methods.

In addition, it should be noted that the activity of the institution and its Operators can never be carried out in practices of mutilation of female genital organs, in conditions that favor segregation, or in conditions of physical or moral dependence on the assisted person.

"Sim-patia" pursues the objective of satisfying its users by providing them with competitive and quality services at reasonable conditions and prices, in full compliance with regional rules and regulations. In detail, the high standards of performance are also ensured through quality monitoring aimed at customer satisfaction through the detection of:

- the satisfaction index of guests and family members in relation to regularity, punctuality, reliability, safety, dissemination of information, and courtesy of the staff;
- guest expectations;
- investments in the quality of services;

- the care of the image of "**Sim-patia**."

"**Sim-patia**" undertakes to guarantee courtesy, attention, correctness, and clarity in all forms of communication with users.

"**Sim-patia**" undertakes to guarantee adequate quality standards for the services offered on the basis of predefined levels and to periodically monitor the perceived quality.

5.4 Relations with voluntary associations

It will be the responsibility of "**Sim-patia**" to shape relations with voluntary associations and volunteers with correctness and transparency. It is good practice that volunteers are periodically involved in information-training courses regarding company objectives, hygiene-health-welfare aspects, safety/fire prevention, and privacy.

5.5 Relations with the Public Administration

"**Sim-patia**" adopts the most rigorous observance of the applicable Community, national, and company regulations in its relations with the Public Administration and with the Local Authorities. In relations with these subjects, it is strictly forbidden to try to improperly influence the decisions of the institution concerned in order to obtain the performance of acts that do not comply with or are contrary to official duties, in particular by offering or promising, directly or indirectly, gifts, favors, money, or benefits of any kind. This prohibition has general validity in the sense that it must also be considered extended to individual initiatives using one's own money and assets or those of the family unit. In any case, acts of commercial courtesy must never be performed in circumstances such as to give rise to suspicions of illegality and compromise the corporate image. The collaborator who should receive indications from anyone to operate in this sense is required to immediately notify his or her contact person or the Supervisory Body.

Relations with institutions, the management of negotiations, the assumption of commitments, and the execution of relations of any kind with the Public Administration and Local Authorities necessary for the development of "**Sim-patia**" activities are exclusively reserved to the corporate functions delegated to do so. Therefore, any relationship between a collaborator and people belonging to the Public Administration/Local Authorities, attributable to areas of interest of "**Sim-patia**", must be reported by the interested party to the Management, which, having assessed the correctness of this relationship in the context of the specific tasks or project, keeps evidence of it.

The Administrative Body of "**Sim-patia**" adopts guidelines and activity planning methods consistent with the

social health plans of the Lombardy Region and with the indications of the local ASL, according to the principles and practices of the best administrative action. With the objective of good governance to derive maximum effectiveness and efficiency from the use of the resources made available by the S.S.R., the institution will take care to define and control:

- the achievement of the quality objectives set by the Lombardy Region;
- the appropriateness of socio-medical assistance;
- the pursuit of the objectives envisaged for institutional accreditation

5.6 Relations with political organizations and trade union

"**Sim-patia**" does not make direct or indirect contributions in any form to political parties, movements, political and trade union organizations, their representatives, or candidates unless previously approved by the Board of Directors.

5.7 Relations with Supervisory and Control Authorities

"**Sim-patia**" bases its relations with the Supervisory and Control Authorities on maximum collaboration and in full compliance with their institutional roles, undertaking to promptly implement their prescriptions.

5.8 Corporate communications and information

"**Sim-patia**" recognizes the primary role of clear and effective communication in external and internal relations. In particular, we remind you that it is forbidden to disclose any information that could in any way benefit individuals to the detriment of others. Similarly, information that could in any way affect the reputation of external parties and the trust that the market places in them must not be disclosed. In this regard, it should be noted that such information, while not disclosed, cannot be used by the Board of Directors or other collaborators with powers to carry out ordinary or extraordinary operations (acquisition or sale of shares, etc.) at the expense of "**Sim-patia**" or of individual natural persons.

In any case, corporate information disclosed externally must be timely and coordinated. The persons in charge of divulging information to the public in the form of speeches, participation in conferences, publications, or any other form of presentation must comply with the provisions of the Management by obtaining prior authorization. Communications must be truthful, clear, and transparent, not ambiguous or instrumental; in fact,

they must be consistent, homogeneous, accurate, complete, and transparent, as well as compliant with corporate policies and programs.

Collaborators are required not to provide corporate information to the mass media without having been specifically and previously authorized by one of the members of the Board of Directors.

5.9 Gifts

Without prejudice to what has already been specified in relation to relations with customers and suppliers, it is further specified that the collaborators of "**Sim-patia**" cannot in general, directly or indirectly, give or receive gifts of a material or immaterial nature or offer or accept money. Acts of commercial courtesy, such as gifts of modest value, of a purely symbolic or personalized nature, and in any case such as not to compromise the integrity or reputation of one of the parties, are permitted. In any case, the decision regarding the appropriateness and amount of gifts, etc., belongs exclusively to the Management.

6. INTERNAL RELATIONS

6.1 Dignity and respect

"**Sim-patia**" complies with national and international provisions on employment and is against any form of irregular work. "**Sim-patia**" opposes and rejects, both in the personnel selection and recruitment phase and in the management of the employment relationship, any form of discrimination based on sex, religion, age, race, social condition, or nationality, guaranteeing equal opportunities and taking steps to remove any obstacles to the effective realization of this situation.

"**Sim-patia**" undertakes to protect the psycho-physical integrity of employees and collaborators, respecting their personalities.

For this reason, "**Sim-patia**" demands that no harassment be given in working relationships, including the creation of an intimidating, hostile, or isolating work environment towards individuals or groups of people. To this end, "**Sim-patia**" prevents, as far as possible, and in any case pursues, mobbing and personal harassment of all kinds, including sexual harassment.

It is the policy of "**Sim-patia**" to promote an internal climate in which everyone interacts with other colleagues honestly, with dignity, and with mutual respect. Therefore, collaborators are required to implement a code of conduct that is constantly respectful of the rights and personalities of colleagues and third parties in general. Last but not least, the ethics of the relationship with the employees are sought in the company through the

preparation of an optimal work environment and through a permanent accident prevention action.

Managers are required to exercise their role with correctness and impartiality and are required to adopt a behavior of exemplary compliance with company regulations and with this Code of Ethics and Conduct, also in order to stimulate the spirit of emulation in their direct collaborators.

Collaborators must know and observe, as far as they are responsible, the provisions of the Code of Ethics and Conduct and must, compatibly with individual possibilities, promote their knowledge among new hires and new collaborators, as well as third parties with whom they are in contact for reasons related to their duties.

Collaborators are required to report to the Supervisory Body, directly or through their internal contact person, any violation of the Code of Ethics and Conduct by colleagues, collaborators, consultants, customers, and suppliers.

"**Sim-patia**" will consider sanctionable any unfounded report made in bad faith.

6.2 Training

"**Sim-patia**" pays the utmost attention to enhancing the professional skills of its collaborators through the implementation of training initiatives aimed at learning the essential elements of professionalism and updating the acquired skills.

6.3 Hiring

Collaborators are prohibited from accepting or soliciting promises or payments of money, goods, benefits, pressure, or services of any kind that may be aimed at promoting the association or hiring as an employee of any person (or even the simple stipulation of an office) or his transfer or promotion. This provision also applies to collaboration contracts or consulting contracts. Each recruitment or collaboration proposal is decided on the basis of the results of assessments as objective as possible concerning the skills possessed in relation to the necessary profiles. Each hiring or collaboration scrupulously follows the specifically dedicated procedure.

Recruitments that, due to their collocation in time and place and/or direct or indirect connections with the Customer, can be configured as an exchange for acquired projects or orders are not permitted.

6.4 Ethical conduct

Collaborators are required to perform their duties responsibly, honestly, and diligently, in accordance with

company policies, procedures, and established directives. The ethical values described in this Code must constitute a constant and systematic duty of the operational conduct of each collaborator of "**Sim-patia**."

6.5 Worker health, safety and environmental protection

"**Sim-patia**" undertakes to manage its activities in full compliance with current legislation on workplace prevention and safety. "**Sim-patia**" does not accept any compromise in the field of health and safety protection for its collaborators in the workplace. Each collaborator must not expose others (internal or external) to unnecessary risks that could cause damage to their health or physical safety.

"**Sim-patia**," in carrying out its business, also takes into account the national legislation on the environment in order not to pollute, constantly optimize the use of resources, and promote the use of products that are increasingly compatible with the environment. In this regard, it particularly opposes incorrect practices in the disposal of medical waste and municipal solid waste.

6.6 Protection of corporate assets

The corporate assets of "**Sim-patia**" consist of tangible physical assets, such as real estate, furniture, computers, printers, and equipment, as well as intangible assets such as, for example, confidential information, software, and sector-specific know-how. The protection and conservation of these assets are fundamental to the safeguarding of corporate interests.

Everyone must feel responsible for the corporate assets that have been entrusted to them, as they are instrumental to the activity carried out.

It is the responsibility of each collaborator in carrying out their corporate activities not only to protect these assets but also to prevent their fraudulent or improper use. The use of these assets by collaborators must therefore be functional and exclusive to the performance of company activities.

7. CONFLICT OF INTEREST

7.1 General principles

"**Sim-patia**" intends to base relations with its stakeholders on the utmost trust and loyalty. "**Sim-patia**" intends to adhere to the highest ethical standards in the conduct of its activities. It is therefore a duty for everyone to avoid situations of conflict of interest or other situations that could be harmful or unbecoming for "**Sim-patia**."

7.2 Family relations

Anyone among the collaborators who has family relationships, even if only potentially in conflict with their role, is required to promptly report it to the Supervisory Body and to the Management.

7.3 External work activity

Collaborators must avoid all those activities that are in conflict of interest with "**Sim-patia**," with particular reference to personal or family interests that could influence their independence in carrying out the activities assigned to them. All subjects operating in the name and in the interest of "**Sim-patia**," who find themselves having an interest currently or potentially in conflict with that of "**Sim-patia**," must refrain from carrying out any act in this regard and report the existence of the conflict to the direct superior, so that he makes the appropriate assessments, such as, for example, indicating another employee or collaborator who is not in the same situation. Therefore, these subjects are obliged to report situations of potential conflict of interest, informing the Supervisory Body and the Management.

Furthermore, it is not permitted to pursue one's own interests to the detriment of corporate interests, nor to make unauthorized personal use of company assets, nor to directly or indirectly hold interests in competitor companies, customers, suppliers, or those responsible for certifying accounts.

7.4 Use of company time and assets

The personnel cannot carry out, during their working hours, other activities that are not congruent with their duties and organizational responsibilities. The use of company assets, such as premises, equipment, and confidential information of "**Sim-patia**," is not permitted for personal use or interest of any kind.

8. VIOLATIONS AND SANCTIONS

Collaborators must promptly report to their internal contacts any circumstance that involves, or appears to involve, a deviation from the rules of conduct set out in this Code and/or a violation of the existing company operating procedures or instructions. The contact persons, in turn, have the duty to promptly inform the Supervisory Body of the news of which they have become aware.

If, for justified reasons or opportunities, it is considered inadvisable to confer with one's direct contact person, the collaborator must communicate directly with the Supervisory Body. Omitting or not reporting such

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circumstances constitutes a violation of this Code of Ethics and Conduct.

Reports are treated in the strictest confidence, and all reported violations are immediately investigated. Collaborators are required to cooperate without reservations in the preliminary investigations and to provide all information in their possession regarding such violations, regardless of whether it is considered relevant. Failure to cooperate, or only partial cooperation, with the investigation activities constitutes a violation of this Code of Ethics and Conduct.

"Sim-patia," in ascertained and verified cases of malice, theft, omissions, forgery, alteration, improper use of confidential information, and misappropriation of physical and intangible assets of the company's assets, will apply the necessary disciplinary sanctions and possibly, according to the seriousness of the infringements committed, initiate legal actions against the people involved.

Any violation of the provisions of the Code of Ethics and Conduct and of company procedures will be dealt with firmly with the consequent adoption of adequate sanctions in line with the provisions of national labor contracts and the Organisational, management, and control model drawn up pursuant to Legislative Decree Legislative Decree 231/2001.

9. ENTRY INTO FORCE AND DISSEMINATION

This Code of Ethics and Conduct enters into force upon its approval by the Board of Directors and is implemented together with the Organisational, Management, and Control Model prepared pursuant to Legislative Decree 231/2001. Any subsequent changes or additions are approved by the Board of Directors and disseminated in accordance with the provisions of the Model.