

CODE OF ETHICS

The Code of Ethics of **“La Nostra Famiglia” Association** describes in a clear and transparent manner the values inspiring Institution to pursue its objectives. Its compliance is essential for proper operation, reliability, reputation and image of Institution.

The activities of the association must, therefore, comply with the principles expressed in this Code of Ethics.

“La Nostra Famiglia” Association recognizes the importance of ethical and social responsibility in the management of Institution and is committed to respecting the legitimate interests of its stakeholders and the community in which it operates¹. At the same time, all employees of Association and all those working for Association are requested to comply with Association’s regulations and the provisions of the present Code of Ethics.

The President

¹ Stakeholders include members of Association, employees, collaborators, clients and their families, suppliers and collaboration partners. In a wider perspective, stakeholders also include individuals, organizations and institutions representing the activities of **Association “La Nostra Famiglia”**, and whose interests are influenced by direct and indirect effects of Association’s activities.

1. INSPIRATION AND ETHICAL GUIDELINES OF “LA NOSTRA FAMIGLIA”

The inspiration that sustains every activity of the Association comes from the thought of the Founder, Blessed Luigi Monza, who has left us, among other indications, the ethical guidelines on which our fundamental choices must be based.

He had foreseen with extreme clarity that the commitment to service to be addressed to the weakest subjects should refer to Christian charity and be expressed according to the needs of the social context.

His indications urge us to concretely implement initiatives of human solidarity "there is a word that deafen our ears every day, this word is **human solidarity**" and to feel **co-responsible** for the lives of people, especially the weakest and most defenceless ones "Everyone feels alive the responsibility of these children before God and the task that is assumed brings it to a conclusion, with love and sacrifice".

The ethical foundations to which the Association is inspired are therefore:

The need for a welcoming and respectful life, however it may be, and for the fundamental human rights, attention to the family, willingness to serve in every area is highlighted by the need of those who are defenseless, solidarity.

2. MISSION AND ETHICAL VISION

Our mission is to protect the dignity of people with disabilities and improve their quality of life through specific rehabilitation interventions, especially during childhood and adolescence. We help families cope not only with disability as such but also with personal and family suffering associated with disability.

We promote social inclusion and protection of people with disabilities in accordance with the principles of solidarity and subsidiarity under many respects.

We intend to contribute to research and scientific knowledge in the field of developmental pathology.

We intend to maintain and develop a relationship of trust with stakeholders and pursue our objectives by achieving the best possible balance of interests, in compliance with the law and principles of honesty, impartiality, reliability, loyalty, fairness, transparency and good faith.

In the light of an ever-increasing complexity in the clinical, organizational and social setting, we are committed, in compliance with the rules, to overcome the defensive medicine to ensure safety and protection of worker, without failing to perform the tasks entrusted and accepted. The approach that we intend to pursue is therefore proactive, prudent and careful.

3. SCOPE OF THE CODE OF ETHICS

The principles and provisions of this Code of Ethics are binding for directors, staff and all those working for Association on a contractual basis (incl. temporary contracts) (collectively “intended recipients”).

In particular, Board members are required to be inspired by the Code principles in setting the objectives of Association, proposing investments and implementing projects, giving concrete effect to the management activities of the Association.

All employees and self-employed providers, as well as partners involved in collaborative projects and all those who have long-term contractual relations with the Association, are required to adapt their conduct to the Code provisions.

Institution undertakes to disseminate the Code of Ethics to intended recipients through specific communication activities.

To ensure proper understanding of the Code of Ethics, periodic communication plans are prepared to promote awareness of the ethical principles and regulations set out in the Code.

To enable full application of the Code, the Board of Directors have appointed a Supervisory Board to:

- * Constantly monitor the application of Code of Ethics by the parties concerned, including through the acceptance of any reports;
- * Report any Code violation to the Board of Directors;
- * express binding opinions on the possible revision of the most important policies and procedures of Institution in order to ensure consistency with the Code of Ethics;
- * Foresee, where necessary, the revision of the Code of Ethics;
- * Propose or apply appropriate sanctions in case of violations.

Appointed supervisors are known at all levels of Institution, including recipients, and appropriate reporting channels are established. All recipients may report, in writing and not anonymously, any violation or suspected violation of the Code to the appointed supervisors, so that he can take appropriate measures ensuring the necessary confidentiality of the identity of the reporter, without prejudice to legal obligations.

If a Code violation is determined, supervisors will notify the Board of Directors of it, along with suggestions and/or sanctions that are considered necessary.

4. PRINCIPLES AND REFERENCE VALUES

4.1 Compliance with current legislation

Institution considers compliance with the law and applicable regulations as a fundamental principle in all contexts in which it operates, as long as they recognize the dignity of each person, associating responsibly with initiatives aimed at ensuring respect for human rights.

4.2 Honesty and fairness

Relations with stakeholders are based on principles and standards of fairness, collaboration, loyalty and mutual trust.

Honesty is the fundamental principle governing all Institution's activities and a prerequisite to managing processes.

4.3 Focus on people

Institution promotes respect for physical and cultural integrity of the person and:

- Provides for safe working conditions and ensures respect for individual dignity.
- Does not tolerate any requests or threats aimed at inducing people to act against the law and the Code of Ethics nor to adopt detrimental behaviours against moral and personal convictions and preferences of each person.

Institution supports human rights in accordance with the UN's Universal Declaration of Human Rights², the Convention on the Rights of the Child³, and the Convention on the Rights of Persons with disabilities⁴.

4.4 Impartiality and equal opportunities

Institution is committed to avoid any form of discrimination based on age, sex, sexual orientation, health, ethnicity, nationality, political opinions and religious beliefs, and in all decision-making affecting relations with stakeholders.

4.5 Transparent and complete information

Institution, through designated parties, informs all stakeholders in a clear and transparent manner about its situation and performance, without any bias for interest groups or individuals.

4.6 Accounting records

All transactions and operations must be duly recorded, and it must be possible to verify the decision-making, authorization and implementation process. All transactions must be backed up by appropriate documentation in order to allow for relevant checks,

² Signed in Paris on Dec. 10th, 1948.

³ Approved by the UN General Assembly in New York on Nov. 20th 1989 a New York and effective as of Sept. 2nd 1990.

⁴ Adopted by the UN General Assembly on Dec. 13th 2006 by resolution A/RES/61/106.

at any time, to verify characteristics and reasons for the transaction and the decision-making, authorization, implementation and recording steps.

4.7 Confidentiality of information

We ensure confidentiality of all information we hold and compliance with regulations on data protection.

All information is treated confidentially and the privacy of individuals is protected.

All employees will:

- Gather and handle only data that they need to know based on their roles
- Store data appropriately in order to prevent unauthorized access
- Share and disseminate data only with prior authorization of the person in charge
- Protect the confidentiality of information according to applicable procedures
- Verify that no confidentiality obligations are in place resulting from relations with third parties.

4.8 Prevention of conflicts of interest

By its governance, Institution intends to make the decision-making process extremely clear. To this end, in compliance with art. 2391 of the Italian Civil Code, each director must inform the other directors and the board of statutory auditors of any interest he has in order to allow for proper verification, in the sole interests of Institution.

Directors are aware that they must notify Board members of any interests or benefits they or their family members could gain from transactions submitted to the Board of Directors for approval.

Directors should be particularly attentive of their duty to ensure proper management of Association.

Institution makes sure to avoid any situations in which conflicts may arise between individual interests and Institution's interests.

These may include:

- The obvious or hidden co-interest of the employee, his collaborators and or family members in the activities of suppliers and competitors;
- Exploitation of one's role and function for their own interests in conflict with Institution's interests
- Use of information whilst carrying out work activities to their own or to third parties' advantage in conflict with Institution's interests
- Performing any work (providing services, intellectual work) for clients, suppliers, competitors and/or third parties that are in conflict with Institution's interests.

4.9 Corporate Governance

Institution creates the conditions for the participation of partners in the decision-making process, provides equal and complete information and protects their interests.

Our corporate governance complies with applicable law and is mainly aimed at:

- * Ensuring proper management practices
- * Controlling risks
- * Ensuring maximum transparency to stakeholders
- * Responding legitimate expectations of the Association's partners;
- * Avoid any transactions to the detriment of creditors and other stakeholders.

4.10 Human Resources

Institution acknowledges the central importance of human resources and the need to establish and maintain relationships based on loyalty and mutual trust.

Therefore, relations at work and collaborations are based on respect for the rights of employees and full recognition of their contributions in order to promote their development and career.

Institution is also committed to a culture of safety by promoting risk awareness and responsible behaviors by employees and collaborators in order to preserve their health and safety.

All employees and collaborators are required to act loyally and comply with contractual obligations and the provisions of this Code of Ethics, fulfilling their duties and honoring their commitments.

4.11 Users

Our behavior's style towards users and their families is based on availability, respect and courtesy, with a view to a relationship seeking collaboration and high professionalism.

Consistent with principles of impartiality and equal opportunities, Institution rejects any form of discrimination against clients and is committed to provide high-quality services meeting their rehabilitation and educational needs, protecting their safety and security, ensuring balanced physical and psychological development and ensuring honest communication with clients and families.

4.12 Suppliers

Purchasing is geared to gain the maximum competitive advantage, granting equal opportunities to suppliers in a loyal and unbiased manner.

Selection of suppliers and purchasing conditions are based on an objective assessment of quality, price and the ability to provide and guarantee adequate services. Employees will not:

- Accept any compensation in the performance of their duties or for acts contrary to their duties
- Be influenced by unauthorized third parties to make decisions and/or acts influencing the performance of their duties.

Employees receiving gifts or other benefits which are not normal business courtesy must take all appropriate steps to reject such

gifts or benefits and inform their manager and supervisor.

4.13 Environmental protection

Institution makes a constructive contribution to environmental sustainability in all its activities and respects the rights of future generations.

Institution's strategies and operational management are based on the principles of sustainable development, ensuring environmental protection and public health, consistent with applicable national and international regulations.

4.14 Community

Institution is aware of the effects of its activities on economic and social development and on the general well-being of the community and is committed to balance their interests. For this reason, it intends to conduct all its activities with respect for local and national communities. Dialogue with associations, in particular users and professional associations, is of strategic importance to Institution to develop its activities and it intends to cooperate with them in respect of their mutual interests.

With regard to relations with political parties, their representatives or candidates, Institution strictly complies with applicable regulations and is not a member of any political party. Institution welcomes and, where appropriate, supports social and cultural initiatives of other associations engaged in the promotion of the individual and working towards improving quality of life.

4.15 Public administrations and Authorities

Relations and commitments with Public administrations are exclusively reserved to appointed Institution's roles, in strictest compliance with applicable law and regulations, and must not affect the Institution's integrity and reputation. For this reason, all contacts with Public administrations must be appropriately stored.

Institution, through its employees or representatives, must not

promise nor offer to public officials, or persons in charge of Public Service, or employees in general of Public Administration or other Public Institutions, money, assets or benefits of any kind in order to promote and favour its own interests or its staff's or to remunerate or pay them for performance of their duties or for acts contrary to their duties.

Tokens such as gifts or entertainments or benefits of any kind are allowed only if they are of small value and do not affect the integrity and reputation of involved parties and are not considered by an impartial observer as aiming at securing an improper advantage. Such tokens must always be authorized and appropriately documented.

It is forbidden to carry out activities directly or indirectly aimed at influencing independent judgment or bringing any advantage to Institution.

Employees or collaborators directly or indirectly receiving offers of benefits from public officials, public service employees or employees of public institutions must immediately report them to person in charge of supervision, if an employee, or to their contact person in the entity, if a third party.

5. SANCTIONS

Compliance with the Code of Ethics is an integral part of contractual obligations for employees, consistent with art. 2104 of the Italian Civil Code. Violations of the Code provisions may constitute a breach of the primary contractual obligations of the contractual relationship or illicit conduct subject to disciplinary action, in accordance with art. 7 of the Workers Statute and disciplinary code, with all legal consequences arising therefrom, including contract termination and compensation for damages.

Compliance with the Code must be considered an integral part of contractual obligations undertaken by self-employed providers and/or subjects entertaining business relationships with Institution. Violations of the Code provisions may constitute a breach of the primary contractual obligations, with all legal

consequences arising therefrom, including contract termination and compensation for damages.

Institution undertakes to provide for, and institute, sanctions proportional to Code violations and consistent with applicable labor law in a consistent, impartial and coherent manner.

6. FINAL PROVISIONS

This Code of Ethics, reflecting Institution's practice, has been approved by our Board of Directors. Any variations and/ or integrations to this Code will be approved by our Board of Directors and promptly notified to intended recipients.

Code of Ethics of “La Nostra Famiglia” Association

Approved by the Board of Directors

Rev. 1 – 2019 July 22nd (English translation)