

MONTECAPRI

ITALY-SPAIN

CODE OF CONDUCT

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CODE OF CONDUCT

This code establishes the behavioural criteria that we expect from our professionals, whatever their responsibilities or posts in our organisation.

This code defines the relationship, the principles and the values of our corporative culture that govern those making up our enterprise in relation to our groups of interest (employees, clients, suppliers, partners and companies of the group or shareholders).

This approach and structure will facilitate the application of our corporative culture, which at all times complies with the regulations and legislation in force in each country.

We inform all our employees, directors and partners of this code, and they commit to its compliance in writing.

Our Code of Conduct integrates robust aspects such as:

1- Behaviour

- I. Regardless of the post they occupy in the organisation of our company, we expect our professionals to act in an honest and professional way at all times.
- II. We work only with the projects and services that we can implement and provide, and we attempt to go beyond our clients' expectations.
- III. We compete in a legal, active and ethical manner.
- IV. We respect the privacy and confidentiality of our clients, as well as of all the people making up our organisation.
- V. When we encounter situations that are difficult to understand or that might involve non-compliance with our code of conduct, we approach those people in our company who are involved before acting or taking decisions.
- VI. We totally reject any kind of request, commitment or payment in exchange for commercial interests.
- VII. All our employees are instructed to be alert to possible situations that could counteract our values.

2 - We listen

- I. We listen to our clients and we help to solve the wide range of issues that tend to arise.
- II. We address issues that clients inform us of in order to improve the results of their human relations.

3 - We add value

- I. With our experience of over two decades working in the world of luxury brands for organisations.
- II. Through our processes we help to increase the transparency and trustworthiness of the business.

4-We protect our name and reputation

- I. Our clients and suppliers trust in our integrity and transparency, qualities that form the basis of our corporative DNA.
- II. It is compulsory for all people working in our company to maintain and preserve our good name and ethics in our day-to-day activities.
- III. We use any information that we handle with great responsibility, following all international regulations.

5 - We respect the citizens of the world

- I. We treat all the people we work with and have relations with in a dignified, polite and respectful manner.
- II. Our commitment involves generating a multicultural, safe, plural, free and professional environment, based upon ongoing training.

6 - We work in an ethical fashion

- I. We exhaustively select all our suppliers and brands and we are committed to complying with the international rules referring to human rights, child labour, and purchase of conflict diamonds.
- II. We work in a responsible way, complying with the laws, uses and customs of countries and governments, wherever we develop our activities.

7 - The responsibility of all employees of Montecapri

- I. Each person must comply with our policies and code of conduct.
- II. We highly value our policies and procedures. Whoever might support, order, approve or be aware of any infringement will be subjected to disciplinary proceedings and possibly dismissed.
- III. Each employee is obliged to respect and follow the policies established in each country where we operate, and to consider the appropriate solutions where needed
- IV. Each employee must help to improve the quality of life of all members of our company, whatever post he may hold in the organisation.

8 - Generic protocol. Ethical decisions

- I. To observe and identify the problem.
- II. To think, appraise, analyse, reason and reflect on how to act.
- III. To evaluate risks and share decisions before acting, wherever necessary.
- IV. To consider the best possible solution and to act decisively.

9 - Protecting the environment

- I. All our activities will be implemented in the most respectful manner possible towards the environment.
- II. We strongly believe in the legacy of biodiversity for the future generations.
- III. We try to reduce to the minimum our ecological impact by setting up systems for recycling and using recycled materials in our processes.

MONTECAPRI
ITALY - SPAIN

For further information, please visit our website www.montecapri.com

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