



## CODE OF ETHICS

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## INTRODUCTION

### I. THE COMPANY

MELTandFLOW was born in Turin in 2010 from the coming together of complementary talents in the area of Event Management and Design. In both sectors MELTandFLOW offers services in which organisational competence and aesthetic research fuse (MELT) into projects and creations that are produced in a dynamic and flexible manner (FLOW), easily adaptable to the specific client requirements.

Based on a broad national and international experience, such a philosophy valuing integration and communication between the organisational and creative sides, allows MELTandFLOW to produce an extremely efficient service as well as fully personalised services. A combination of event research and simulation of a variety of innovative solutions results in the most cohesive marriage of the different stages, steps and competencies; from planning to event programming, from PR to function details, from scenography to set up, from logistics to graphics.

As well as producing events that are specialised in terms of scenography and set up, such a mix of competencies and methodologies integrates and highlights MELTandFLOW's design and styling talents. A focused approach and cultural awareness is applied to the planning of services as well as to putting together events for such product's promotion, communication and commercialisation. MELTandFLOW can offer clients a turnkey service, which for events encompasses concept definition to the fine furnishing details, guaranteeing coherence between the project design and adherence to client requests.

MELTandFLOW's business comprises a range of multi-faceted activities able to address various needs with specific or integrated solutions. In the first case, while offering competitive prices, in line with its style and image characteristics, MELTandFLOW interprets the client's needs, guaranteeing personalization of each single service. In the second case, the integration of the various activities, capabilities and resources - typical of MELTandFLOW's style of design and implementation - exalts the unique nature of the event, assuring a decidedly competitive level of quality and reduction of costs

In addition to organizing and managing events, MELTandFLOW also offers targeted consulting for specific design set up according to the requirements expressed by the client, with or without correlated events. MELTandFLOW's real strength lies in the possibility of offering a "turn-key" service, directly and without intermediaries, stretching from definition of the creative brief with the client to effective staging of the event. Integrated management and staging of the event promotes optimisation of resources and direct control of all the phases of the process, making it possible to achieve the client's objectives in the most effective and efficient manner.

*Creativity, design capabilities and personalised implementation are the distinctive traits of MELTandFLOW*

MELTandFLOW designs personalised communication services with the aim of proposing solutions able to guarantee effective promotion of corporate image or to reinforce the image of products and services.

## II. OBJECTIVES OF THE CODE OF ETHICS

The Code of Ethics (hereinafter also referred to as the “Code”) aims at guiding the management of MELTANDFLOW according to criteria of compliance with the Law, as well as fairness, professional correctness and economic efficiency in internal and external relations with the Company, in order to promote unambiguous lines of conduct aimed at satisfying the needs of stakeholders and consolidating a positive corporate reputation.

By approving this Code of Ethics, the Company declares that it inspires its activities to the principles contained therein in order not to undertake, or continue, any relationship with anyone who proves not to share the spirit or violates the principles and rules of conduct.

In no way may the pursuit of the Company’s interest disregard compliance with the regulations in force and the contents of the Code of Ethics.

## OUR VALUES

### I. EMPLOYEE HEALTH AND SAFETY

MeltandFlow adopts all the safety measures required by technological evolution to guarantee a safe and healthy working environment, in full compliance with current legislation on the prevention and protection of accidents at work.

To this end, the Company carries out technical and organisational interventions concerning risk assessment, monitoring of working methods and the provision of training and communication.

MeltandFlow employees are required to scrupulously comply with the regulations and obligations arising from the relevant health and safety legislation, as well as to comply with all the measures required by internal procedures.

The Company undertakes to ensure compliance with the conditions necessary for the existence of a collaborative and non-hostile working environment and to prevent discriminatory behaviour of any kind.

The cooperation of all is required in order to maintain a climate of mutual respect for the dignity, honour and reputation of each individual.

### I. WORKING CONDITIONS

MeltandFlow promotes working conditions and environments that protect the psychological and physical integrity of people and encourage proactiveness, creativity, active participation, teamwork and responsibility.

The set of values on which the company is founded includes a focus on personal relationships as well as team building as a source of a positive social climate and smooth operations in order also to improve the company's productivity.

The employees are asked to participate in company dinners and are involved in the preparatory activities for the realisation of events, so that a climate of serenity and cooperation can be established among them, which also has a positive effect on the success of the work itself.

## II. CAREER MANAGEMENT AND TRAINING

*Selection and recruitment of employees* - Personnel selection is subject to verification that candidates fully meet the required professional standards. The competent Function takes appropriate measures to avoid favouritism, nepotism or forms of patronage.

Staff are hired on the basis of regular employment contracts, and no form of employment relationship is allowed that does not comply with the regulations in force or that circumvents them.

Given the peculiarity of the activity carried out - for which specific skills are required from time to time depending on the type of event/exhibition commissioned - the company sets up an ad-hoc work team, also turning to external professionals and third-party collaborators, with whom there is a long working history and with whom regular contracts are stipulated.

All those who come into contact with the company are inspired by these values:

*Empower Employees to Do Their Best Work*

*Hold Team Members Accountable to Goals*

*Reward High Performance*

*Foster a Fun, Positive Work Environment*

*Increase in Job Satisfaction*

*Consider Remote Working Options*

*Use the Right Technologies*

## III. DIVERSITY DISCRIMINATION

The Company respects the fundamental rights of people, protecting their moral integrity and guaranteeing equal opportunities. In both internal and external relations, the following is not allowed: discriminatory behaviour based on political and trade union opinions, religion, race, nationality, sex, sexual orientation, state of health and in general any intimate characteristic of the human person.

#### IV. ANTICORRUPTION & BRIBERY

*Legality* - All collaborators are required to respect the laws and regulations in force, the Code of Ethics and the company's internal rules, applying them with honesty and fairness.

*Integrity* - In its relations with third parties, MeltandFlow undertakes to act in a correct and transparent manner, avoiding misleading information and behaviour such as to take undue advantage of others' positions of weakness or lack of knowledge.

*Loyalty* - Relations with the outside world, relations with Collaborators and relations between them must be marked by the utmost loyalty, which consists in acting with a sense of responsibility and applying an attitude of complete good faith in every activity or decision.

*Transparency* - All of the Company's actions and relations with its stakeholders must be carried out by guaranteeing correctness, completeness and timeliness of information along the lines dictated by the law, best market practices and within the limits of the protection of the Company's know-how and assets.

#### V. INFORMATION SECURITY

Collaborators undertake to treat all information obtained in connection with the performance of their work as confidential and, therefore, not to disclose it except within the limits of the use of such information for the performance of the activity and in compliance with the principles of transparency.

*Absence of conflicts of interest* - Employees ensure that all business decisions are made in the interest of the Company, avoiding any conflict of interest between personal or family economic activities and their duties in the Company.

#### ETHICAL VALUES

MeltandFlow observes the principle of transparency based on the truthfulness, clarity and completeness of information. Observance of this principle implies a commitment to provide the necessary information, both externally and internally, in a clear and complete manner, adopting a verbal or written communication that is easy and immediately comprehensible and after having checked the requirements of the information itself.

MeltandFlow observes the principle of fairness which implies the respect by all, in the performance of their working and professional activities, of the rights of each person involved, beyond the mere observance of the law and the employment contract.

#### I. SPECIFIC APPROVAL PROCEDURE FOR SENSITIVE TRANSACTIONS

MeltandFlow collaborators may not ask for gifts, money or other benefits for themselves or for others, even through a third party, nor accept them, unless they are useful and of modest value or comply with normal business and courtesy practices, from anyone who has benefited or who may benefit from the Company's activities. Relations with suppliers are based on loyalty, fairness and transparency; suppliers are chosen on the basis of objective criteria of cost-effectiveness, opportunity and efficiency. The choice of suppliers on a purely subjective and personal basis is precluded.

MeltandFlow personnel shall not ask for or accept, for themselves or for others, gifts or other benefits from suppliers, competing companies and third parties. Similarly, they do not accept salaries or other benefits in money or in kind, nor collaboration assignments from subjects other than MeltandFlow.

## II. AWARENESS TRAINING TO PREVENT INFORMATION SECURITY BREACHES

Transparency and correctness of information: Collaborators must ensure the truthfulness, transparency, accuracy and completeness of the documentation and information provided in the performance of the activity for which they are responsible.

MeltandFlow condemns any behaviour aimed at altering the correctness and truthfulness of the data and information contained in the financial statements, reports or other corporate communications required by law and addressed to the public and the supervisory authorities.

Protection and confidentiality of information: Collaborators must guarantee the utmost confidentiality with regard to strategic, confidential or intellectual property information of MeltandFlow.

The Company guarantees the correct handling of confidential information and requires its Collaborators to maintain absolute secrecy on any confidential information concerning the Company or third parties.

MeltandFlow is committed to protecting the intellectual property and copyright of third parties. All employees shall help to ensure compliance with intellectual property rights and copyright legislation.

Protection of personal data: The Company protects the personal data acquired in the course of its activities with regard to its employees and third parties.

The Company processes such data in compliance with the regulations in force and the moral protection of individuals.

*Traceability and correctness of operations* - All operations and transactions, in the broadest sense of the term, must be authorised and recorded in compliance with the principles of honesty and impartiality. It is the duty of all Collaborators to act with due diligence and to ensure that the activities carried out are supported by documentary and/or IT evidence, also in order to allow the congruity and legitimacy of the operation.

## LABOUR AND HUMAN RIGHTS

MeltandFlow protects and enhances its human resources by committing itself to maintaining the necessary conditions for the professional growth, knowledge and skills of each person, carrying out appropriate training for professional updating and any initiative aimed at pursuing this goal.

MeltandFlow promotes the participation of employees in the life of the company by providing participatory tools for collecting employees' opinions and suggestions.

No employee may be required to perform any task, service or favour that is not due according to his or her employment contract and role in the company.

The company is committed to combating mobbing, stalking, psychological violence and all discriminatory behaviour.

MeltandFlow is also attentive to the health of workers and has always promoted policies of information and training on the potential risks of office work.

Any employment decision, from employment, recruitment, access to training, termination is based solely on relevant and objective criteria such as merit, attitude, work, ethic, skills and work experience.

MeltandFlow does not benefit from child labour. The minimum age for employment is that permitted by the law of the country.

MeltandFlow does not benefit from any form of forced labour, involuntary prison labour or human trafficking. Workers are allowed to move freely, be free to terminate their employment with MeltandFlow after reasonable notice.

MeltandFlow prohibits any corporal punishment, threats of violence, the use of financial fines and any other form of mental or physical abuse, coercion or intimidation. Any kind of physical abuse, physical or verbal threats or any form of intimidation of the person is also prohibited.

Each employee is required to be aware of the Code and the relevant rules governing the activity within the scope of his or her job. All employees are obliged to refrain from conduct contrary to these rules and to consult their superior in case of doubt or need.

#### I. PERCENTAGE OF EMPLOYEES RECEIVING SOCIAL BENEFITS

The company does not have specific welfare policies for its members and collaborators, but they do have specific health and accident insurance cover when travelling and participating in events.

## ENVIRONMENT

MeltandFlow has always developed its activities on the basis of the location free concept, which is why the company does not have its own shared premises with its collaborators on a daily basis but prefers its resources to carry out their activities in smart working mode.

This type of approach is possible because MeltandFlow has always invested in a shared cloud where all resources can have access to information and data. MeltandFlow's mission has always been to pay particular attention to the environmental implications of the work choices it makes: by adopting a model such as the one described above, the company minimises the environmental impact linked to the consumption of paper and toner, electricity consumption and the pollution caused by travelling to work.

When events are organised abroad, the search for suppliers is based on a criterion of geographical proximity, both to contain costs and to reduce energy waste.

#### I. ENERGY CONSUMPTION AND WASTE MANAGEMENT

The company has developed its business over the years by operating in location free conditions in order to minimise environmental impact. Employees work from home using video conferencing systems, thus limiting travel to a minimum and reducing it to strictly necessary cases (e.g. events, shows, institutional meetings with clients, etc.).

In order to encourage cooperation and teamwork, although not sharing a common space, the company invested in a shared cloud that allows everyone to access information and files at the same time; this approach minimises the environmental impact of paper and toner usage as well as saving on management costs.

Promotion of sustainable consumption to costumers

MeltandFlow operates in the event organisation sector. The core business of the company is not the setting up of the event, i.e. the supply of stands or material, but rather the coordination and search for suppliers and partners capable of carrying out the requirements of their clients.

In its search for partners and suppliers, the company prefers companies with a green mission as well as those who pay attention to environmental impact. MeltandFlow has always preferred suppliers who offer rental services for the equipment and materials to be used in the organisation of individual events; even if this solution is not feasible, MeltandFlow undertakes to offer the customer, where possible, materials or set-ups already used previously in order to reduce environmental impact to a minimum.

In order to protect customers, MeF is looking for suppliers who:

- adhere to the code of ethics and professionalism
- MeF does not enter into any agreements or understandings with suppliers that would restrict competition, pricing and bidding
- MeF avoids any form of corruption, extortion or embezzlement in order to obtain its own advantage

In general, with regard to relations for the supply of goods and services, the employees in charge are obliged to:

- comply with company procedures concerning the selection, choice and supervision of the Supplier;
- not preclude any Supplier, who meets the requirements, from competing for the sale/supply of the necessary products/services (subject to seeking the maximum competitive advantage for MeF and its clients);
- obtaining the cooperation of Suppliers in meeting the company's needs in terms of quality, cost and on-time delivery;
- observe and enforce the contractual conditions clearly stipulated in writing;
- maintain an open and frank dialogue with suppliers (in line with good business practice);
- instructing suppliers on MeF's internal code of conduct and that of its customers.

## LENDERS

*Transparency and compliance with commitments* - Lenders are the entities that provide financial support to Meltandflow's investment choices.

The Company ensures the truthfulness and timeliness of the information requested by lenders, so that their investment decisions are based on a truthful representation of their equity, economic and financial situation. In respect of loans received, the Company strictly complies with the commitments undertaken with the lenders, punctually meeting the agreed deadlines.

## PUBLIC ADMINISTRATION

*Integrity and independence in relations* – MELTANDFLOW's conduct is inspired by the principles of legality, fairness and transparency, in order not to induce the Public Administration to violate the principles of impartiality and good performance to which it is bound.

In order to ensure the utmost clarity in institutional relations, these are only managed by company representatives who have received appropriate powers and who are not in situations of conflict of interest with respect to the representatives of the institutions themselves.

Gifts or acts of courtesy and hospitality towards representatives of Governments, Public Officials and public employees are allowed to the extent that their modest value does not compromise their integrity and independence. In any case, these types of expenditure must be authorised and documented.

The Company condemns any conduct, by anyone, consisting in promising or offering directly or indirectly gifts and benefits (money, goods, services, favours or other benefits) to members of the Italian or foreign Public Administration, their relatives or relatives-in-law, from which it may obtain an undue interest and/or advantage.

In the context of relations with the Public Administration, it is also forbidden to alter the operation of a computer or telematic system of the Public Administration, manipulate the data contained therein in order to obtain an unfair profit or in any case falsify, alter or omit data and/or information in order to obtain an undue advantage or any other benefit for Meltandflow.