

THE MIDO CODE OF CONDUCT

RECITALS

This Code of Conduct was voluntarily introduced by MIDO s.r.l. (hereinafter MIDO) to manage its relationships with internal and external stakeholders in a transparent manner. This Code of Conduct provides the principles of conduct to follow in carrying out corporate business and the rules of behaviour that all those who in any way contribute to attaining corporate objectives are required to comply with. This Code is therefore binding not only upon managers and employees, but also upon anyone who works on behalf of the company.

This Code of Conduct, which is published on the website www.mido.it, will be reviewed periodically to include updates and organisational changes that may have significant repercussions on transparency.

1. RELATIONSHIPS WITH COLLABORATORS

1.1 Recruitment of personnel

Personnel is recruited in accordance with principles of fairness and transparency, respecting equal opportunities. MIDO's commitment is to objectively examine the professional qualifications and experience, ambitions and expectations of candidates who, after they are taken on by the company, receive clear information on the roles, responsibilities, rights and duties of the parties.

1.2 Management of personnel

Protecting and promoting the capabilities of its resources is a constant commitment for MIDO: for this reason, wherever possible, professional upgrading training courses are organised, and personnel is encouraged to participate in the life of the company. Relationships between employees should be based on loyalty, fairness and respect at all times: the company is committed to combating episodes of mobbing, stalking, psychological violence and any behaviour that is discriminatory or detrimental to the dignity of the person.

1.3 Workplace health and safety

MIDO is committed to ensuring a healthy, safe workplace for its employees: the company considers that protecting the health of its collaborators to be a priority and accordingly guarantees compliance with all applicable health care and hygiene regulations.

1.4 Salaries

MIDO complies with the labour laws and regulations in force, above all as regards the maximum number of working hours permitted and the salary levels of its collaborators.

1.5 Gifts

The company permits business courtesies such as previously authorised gifts or other forms of hospitality, provided they are of moderate value. Gifts that may be intended as a way of obtaining advantages that do not comply with the principles of MIDO's Code of Ethics and Code of Conduct are not permitted.

2. ORGANISATION

2.1 Compliance with internal procedures

MIDO believes that management efficiency and compliance with the principles to attain corporate objectives are essential. All collaborators are required to comply with internal procedures and must act in accordance with the levels of authorisation assigned at all times.

2.2 Accounts

In the management of accounts, senior managers and collaborators should comply with principles of truthfulness, accuracy and transparency, so as to protect the reputation of MIDO both internally and externally.

2.3 Protection of company assets



Senior managers and collaborators should perform their duties trying to rationalise and reduce the use of company resources. They are also required to properly enforce security provisions to protect technological devices from unauthorised access that might adversely affect the protection rights related to data held by MIDO.

2.4 Privacy

MIDO complies with the privacy policy pursuant to the applicable Italian law and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016.

3. EXTERNAL RELATIONS

3.1. Relations with the Authorities and the Public Administration

Relations with the Authorities and the Public Administration should be based on the utmost clarity, transparency and collaboration, in full compliance with the law and according to the highest moral and professional standards.

3.2 Relations with political organisations and trade unions

MIDO shall not provide any undue contribution in any form to political parties, trade unions or other social groups, other than in specific cases and exceptions, and in any case within the permissible limits set forth by current regulations.

3.3 Relations with customers and suppliers

Collaborators shall exert their best efforts to ensure prompt, high-quality services to customers, attempting to limit any form of disservice or delays in order to maximise customer satisfaction. In particular, collaborators should not engage in any unfair or misleading behaviour that may induce customers or suppliers to rely on unfounded facts or circumstances.

Relations with suppliers should be based on loyalty, fairness and transparency at all times. Suppliers shall not be selected on subjective and personal basis, but on the objective criteria of affordability, opportunity and efficiency. Senior managers and collaborators should monitor as closely as possible that suppliers and customers comply with the values and principles set forth in the Code of Ethics and Code of Conduct.

3.4 Relations with stakeholders and the media

Information disseminated by MIDO to stakeholders should be complete and truthful so that recipients may make correct and informed decisions.

More specifically, in relations with the media, MIDO should always comply with the relevant values and principles provided by the Code of Ethics.

3.5 Relations with the community

MIDO's social commitment is reflected in its positive contribution to the community of the territory in which it operates, above all by supporting, whenever possible, voluntary work carried out by its employees.

3.6 Environmental sustainability

MIDO undertakes to reduce, or offset, any environmental impact caused by its activities. Senior managers and collaborators should therefore be attentive to protecting natural resources, optimising energy resources and improving internal processes.

4. CONTROL SYSTEM

Senior managers and collaborators should monitor compliance with the Code of Conduct, insofar as applicable according to the role they cover within the company. Collaborators may report any facts and circumstances potentially in breach of the principles and requirements of this Code to the person they report to. After ascertaining that the facts reported have indeed occurred, MIDO's management will introduce any measures that may be required to stop the violation, even by applying disciplinary measures as set forth by applicable laws.

Milan, 19 July 2019