



Company Code of Conduct



“Your growth is our growth, your success is our success”



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1. Introduction

The Code of Conduct aligns itself with the request of United Nations of “embrace, support and carry out that set of fundamental values regarding human rights, work standards, environment and fight against corruption” encoded in the Universal Declaration of Human Rights, in the Declaration of International Labour Organisation about fundamental principles and rights of work and in the Ten Principles Global Compact regarding Human Rights, Work, Anti-Corruption and Environment.

In this framework, Code of Conduct expresses the set of values and principles that International Gate SA decided to adopt in the development of their activities and in the relationship with all their interlocutors (Stakeholders) and represents part of the asset of Corporate Governance of International Gate SA.

The Code of Conduct is the binding reference point that Co-workers and Employees – starting from administrators and managers – should take as an example to orient everyday work, actions and interpersonal relationships in the Company and towards community and marketplace: the conviction of pursuing the interests and objectives of the Company of belonging can't legitimize the violation of rules of the Code of Conduct, which will prevail over any internal regulation, procedure or contractual relationship that may possibly conflict with it. International Gate SA hopes that its Stakeholders will recognize their self in the values that are the basis of Code of Conduct, that they will share and apply them as the basis of a business management guided by the principles of integrity, loyalty, correctness, transparency, compliance with the rules and the law, without conflict of business or personal interests.

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2. Mission

International Gate SA has always invested its financial, human and logistic resources to affirm as priority value the establishment of synergy and partnership with its customers and suppliers, able to guarantee flexible and dynamic solutions, immediate and rigorous.

2.1 Values

Attention

International Gate SA is aware of the public and social role of its Mission and pursues it daily with the utmost care and attention. In this context, the guiding principle of International Gate SA's activities is the quality of the service geared towards:

- a) Customers, be they Companies or Workers: meeting their specific needs, with tools and services ad hoc, offering real, targeted, long-lasting solutions that create value, simplifying complexity;
- b) Person: to strengthen the recognition of its centrality and the awareness of the great importance that work – or its research – has for it, always welcoming with respect every individual at the company facilities and taking care of him, with the conviction that the Company can have an educational role in people's lives.

Passion

International Gate SA conceives work as a means for the realization of the Person and his desires and his desires and as participation in the construction of a greater Good that can last for the future. For this reason, International Gate SA believes that the only valid way in which its employees, collaborators and representatives can carry out their work mission both by being passionate about the realization of job opportunities that respond to the needs and objectives of People and Customers we meet every day.

Lifelong learning and innovation

International Gate SA is committed to developing the skills and competences of all employees and workers, stimulating the curiosity of individuals, protecting and enhancing the diversity that characterize each, so that energy and creativity of individual finds full expression, for the realization of one's own potential. Continuous learning and the appropriate application of improvements and innovations are necessary conditions for the best possible performance of work, creating new solutions to respond to the development of economic and social conditions, to support business continuity for the benefit of all Stakeholders.

Collaboration

International Gate SA recognizes the fundamental value:

- a) internal communication and team spirit, to make the work satisfactory and increase the sense of belonging;
- b) collaboration between employees and organizational structures, based on mutual respect for professionalism, as the only way to achieve the common business goal;
- c) dialectical exchange with all stakeholders, to ensure a healthy and joint growth. All members of International Gate SA – regardless of roles, responsibilities and seniority – are therefore called to create synergies and establish positive relationships with colleagues, openly discussing and making proposals to improve the Company's services and processes and create value for all Stakeholders.



Sustainability

International Gate SA believes that the ability of a company to successfully maintain its equilibrium and performance conditions in the market is an indispensable constraint for a healthy business activity and for the fulfilment of the needs and purposes of Stakeholders. The company's growth must be based on the maximum exploitation of the resources that we are given in trust, reconciling protection of human potential, economic performance, social responsibility and environmental sustainability.

Responsibility

Everyone at International Gate SA is called to act and communicate consciously, respecting the reputation of the company and all interested parties, arguing:

- a) universally recognised human rights, and actively safeguarding them;
- b) diversity and social and occupational inclusion, respecting the principles of equality, impartiality, protection of the dignity and security of the person, and against all form of discrimination;
- c) the laws of the countries in which International Gate SA is present, combating abuses and corruption in all its form;
- d) standards that safeguard health and safety at work, propagate their culture and adopt the most effective preventive measures;
- e) the environment, supporting the most advanced initiatives, technologies and practices aimed at preserving it.

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3. General principles of conduct towards Stakeholders

International Gate SA structures its action according to strong ethical principles, supported by a clear assumption of individual responsibility, as a lever aimed at encouraging in all the people who work at International Gate SA – in particular in Employees and Collaborators – a full awareness of the consequences of their professional choices, to the benefit not only of themselves and the Organization, but also all the other Stakeholders.

Legality

International Gate SA operates on the basis of conduct based on the principles of transparency and fairness of contractual relations.

A conduct contrary to Law is considered by International Gate SA unacceptable in the conduct of business. International Gate SA undertakes to conduct its activities in compliance with national, community, international regulations and corporate procedures inspired by them.

International Gate SA aims to protect the value of fair competition by refraining from engaging in collusion, intimidation or abuse towards its competitors as governed by the Civil Code and complementary rules or regulations. Furthermore, having become aware of confidential and sensitive information concerning the process, products, or other material of its customers, also operating under the regime of competition between them, refrains from engaging in conduct which may be judged to compromise the competitive profiles of its customers' market.

Management of Monetary Flows

International Gate SA adopts a transparent system in management of monetary flows, in particular, the payment arrangements shall always be accompanied by documents proving the reason for the payment and are always authorised in accordance with the management system adopted and in any case in accordance with the provisions of the delegation system put in place.

Impartiality

International Gate SA bases its action on the principle of impartiality, in order to maintain a constant balance between the particular and general interests of the individual and the Company, of each Employee, User, Customer and Supplier, recognizing and enhancing diversity on the basis of mutual respect and common adherence to the values and principle of this Code of Conduct. The principle of impartiality supports in particular the conduct of all those operating within and on behalf of International Gate SA:

- a) in the relationship with employees, where the selection, recruitment, training, remuneration and management of human resources must be based exclusively on criteria of merit and competence, avoiding any kind of discrimination, such as gender, religion, national or ethnic origin;
- b) cultural or social background, disability or illness, sexual orientation, age, marital status or political opinions;
- c) in the treatment of People, in respect of which no unlawful conditions or undue inconvenience are allowed and working conditions that allow the development of personality and professionalism are promoted;
- d) in the relationship with Customers, in order to be able to provide more and more qualitative services, taking into account the peculiarity of each;
- e) in the relationship with Suppliers, where International Gate SA does not intend to preclude any person who fulfils the conditions to compete from competing for contracts, opposing for other commercial practices that cause the Supplier to sign a contract unfavourable to him.

Confidentiality

International Gate SA protects the privacy of all Stakeholders and the confidentiality of the information and personal data in its possession; all collection operations, storage and processing of personal data may be carried out only by people expressly authorized to process, who operate under the direct authority of the owner or manager. The data must be collected and processed for specific, explicit and legitimate purposes, and according to the principles of adequacy, relevance, not excess, and in any case authorized people responsible for the treatment are obliged not to use any information for purposes not connected with the exercise of the business activity. Given the sensitivity of the information and documents processed (including CV and pay slips, commercial and employment contracts), all those operating within and on behalf of International Gate SA undertake to comply with the strictest privacy procedures to protect all data subjects, applying the laws in force and the commitments agreed, from the contract of employment up to specific non-disclosure agreement.

Honesty

International Gate SA asserts that honesty is an indispensable condition for gaining credibility and for establishing with all Stakeholders relationships of trust, which allow to improve the operation, the image and the reputation of the sector. The correctness and the good management in the affairs permeates the actions of the business exponents to all the levels, to the outside and to the inside of the Enterprise:

- a) acting always in respect of the tangible and intangible assets of the Company, that is, avoiding categorically appropriating any good, fact, commercial information, professional relationship with Workers, Customers and Suppliers, which represent a corporate asset and as such must be managed, also in order to ensure the correct provision of services.

Transparency

International Gate SA complies, in acting, in communicating and informing, to the principle of transparency, which is a decisive element to obtain reliability towards internal and external Stakeholders. Transparency is a principle of conduct in particular:

- a) in relation to company management and contractual relations – with Companies, Customers, Suppliers and Workers – that must be fair, clear and verifiable and with respect of the services offered, that must be clearly defined;
- b) in relation to the communication of information about the Company to others, which must also be truthful, simple, understandable, timely and accessible to all.

In particular, no Employee or Collaborator is authorised to convey personal opinions on behalf of International Gate SA's companies, including via social media. The disclosure of information and data concerning International Gate SA as well as the use of logos, must be authorized by the department.

Health and Safety

International Gate SA undertakes to comply with all legal obligations in the field of Hygiene, Health and Safety, starting from an accurate risk assessment and definition of prevention and protection measures, in order to promote the effective safety at the workplace – in terms of safety and security. All Employees, Collaborators, Workers, and those who work in the name and on behalf of International Gate SA without exclusions, are required to:

- a) respect the current regulations and the performance of their health and safety duties, scrupulously complying with the specific work procedures provided for their task: violations of the relevant regulations and laws are never tolerated for any reason;
- b) take the commitment to proactively influence Colleagues on safe behaviour to be implemented, acting as communicators of the culture of safety at work, including an irreproachable personal and workplace, the adoption of attitudes and behaviours marked by respect, civilization, sobriety and good education between Colleagues and towards third parties.

Environmental sustainability

International Gate SA develops its activities in compliance with all the laws and regulations in force expressed to protect the environment, with the awareness that all Companies, regardless of their core business, are called to implement good consumer practices that ensure an optimal balance between the use of natural resources and regeneration of them.

4. Implementation and monitoring

4.1 Recipients of the Code

The Addressees of this Code are:

- a) Managers and Employees belonging to the operating structures;
- b) Temporary agency Workers administered;
- c) Collaborators and Consultants.

4.2 Dissemination and knowledge of the Code

It is in the interest of International Gate SA that the Code of Conduct is fully disclosed to all Recipients and third parties and that the principles and values contained therein are shared. Managers and functional managers of the Companies must explain with their actions the values and contents of the Code of Conduct, being sure that they are perceived and pursued by all. Employees, Collaborators and Consultants must adapt their conduct to the values, principles, objectives and forecasts contained in the Code of Conduct. All Recipients and, as far as applicable, also Customers and Suppliers and other interested Stakeholders will know the provisions provided by the Code of Conduct, the reference regulations as well as the company procedures that regulate each specific internal function and will be invited to comply with them.

4.3 Application of the Code

The monitoring of compliance, interpretation and verification of the principles contained in this Code of Conduct include:

- a) to monitor the application and operation of this Code;
- b) to supervise the information and formation of all Recipients;
- c) to propose and validate the update with respect to legislative changes and the evolution of activities and organisation.

Each recipient is committed to reporting any behaviour or circumstance that deviates from the principles of the Code of Conduct. Any situation or conduct contrary to the provisions of this Code, internal procedures and laws in force that cannot be resolved by intervention in first person or by recourse to his direct superior, must be communicated by mail to info@internationalgate.ch, that will ensure the utmost confidentiality in the handling of reports, in such a way as to guarantee anonymity and exclude any form of redress or discrimination against those who have reported violations of the Code; every report will be examined and appropriate measures will be proposed.

This Code has validity both for activities carried out in Switzerland and abroad, while taking into account the cultural, social and economic differences of other countries.

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