Code of Ethics

of STUDIO TRE SOCIETÀ BENEFIT S.p.A. a Socio Unico

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THE COMPANY

PEOPLE WHO KEEP THEIR WORD

STUDIO TRE SB S.p.A. (hereafter the "Company") **was founded in Reggio Emilia, Italy, in 1979. It started out as a translation and interpretation agency** and entered the world of language consultancy and conference organisation to help companies and professionals of excellence expand into international markets and find new customers, suppliers and partners. This marvellous adventure arose from a dream shared by three young women and 10 local translators/interpreters working in 3 main languages. Over the years a series of major changes have enhanced and strengthened the Company.

- In **1990**, it launched the **Events division** to organise the first conferences in the area.
- In **1996**, it opened new offices at a new location.
- In **2003**,it continued its development as a corporate entity, having started out as a limited partnership company (S.a.S.), turning into a **Limited Liability Company (S.r.l.)**.
- In **2006**, due to its significant growth, it had to double its office spaces, with 7 staff members and 480 mother-tongue translators located around the world.
- In **2010**, the Company obtained **UNI EN ISO 9001 and UNI EN 15038 certifications**.
- In **2014**, to celebrate 35 years in business, it restyled its corporate logo and developed its own **Charter of Values**.
- In **2017**, it updated its UNI EN ISO 9001 and UNI EN 17100 certification.
- In **2018**, it registered its **trademark**, adopted **Model 231** and a **Cyber Security Total Protection** system providing additional data security and confidentiality, and opened a new branch office in Milan.
- In **2019**, to celebrate 40 years in business, it **became a Public Limited Company and began to invest in innovative startups**, thereby reaffirming its constant focus on people and technological innovation.
- **In 2020, it expanded, becoming a Language Service provider and offering strategic language consultancy services.**

  Project managers with new technological/digital skills were introduced and new vendors and partners with appropriate expertise were identified. The Company developed a proprietary **management software system**, optimised internal procedures, strengthened its data protection system with ongoing vulnerability assessment and took out professional liability insurance.

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- **In 2021**, to mark its 42nd year, **it opened a new branch office and launched a new website** with a strong focus on people and the team's technological skills.

  It opted to become a ***Società Benefit*** (Italian Benefit Corporation) and to pursue the mission of having a positive, sustainable impact on both people and the environment, with a responsibility towards future generations. Its commitment to creating value focused particularly on its support for non-profit organisations and their local and international education projects.
- **In 2022**, it published its **first Impact Report**, an important step in building an ever more sustainable business model in terms of transparency and awareness towards the Company's customers, partners, vendors and the community in which it operates.
- **In 2023**, it joined **Assobenefit (*Associazione Nazionale delle Società Benefit* – National Association for Italian Benefit Corporations)**, and was awarded a **Legality Rating** certificate by the Italian Competition Authority, achieving the highest score. It also obtained **BCorp certification**, demonstrating the Company's particular focus on sustainability, ethics and social responsibility. Furthermore, it established new partnerships with WPML and ATA.
- **In 2024**, it became **Trados Partner** by joining the LSP Partner Program, so enhancing the quality of its services with a team of professionals that are ever more reliable and better informed.

  It opened 4 new co-working and language consultancy offices –in addition to its existing premises in Milan– in Treviso, Rome, Piacenza and Sondrio. It also established a partnership with a company in Lugano, Switzerland.

  In addition, **it acquired a company** with expertise in new sectors and expanded its team of professionals and consultants. The Company entered the **2024 Europe Inspiring Workplaces Awards** and was a finalist in the **People First** category (achieving 20th place out of 25, out of 1,000 entries) for creating an inclusive work environment based on respecting, trusting and valuing people.
- **In 2025**, it introduced a new low-code management system designed to accelerate company procedures and make them even more sustainable. It expanded its **network** to **Turin** and, in the same city, sponsored "**TedX Torino: Close to me | Embrace the moment, live in the present".** It took part in the **PMI Day Unindustria**, welcoming third-year students from local middle schools into the company to help them gain inspiration as they decide on their next course of studies. It organised an **event** at Palazzo da Mosto **dedicated to the BCorps** of Reggio Emilia, Modena, Parma and Ferrara, with the aim of expanding its network of contacts, in conjunction with the visit to Benati's exhibition **Encantadas**. **It sponsored the exhibition organised by Fondazione Palazzo Magnani, dedicated to Margaret Bourke White, and the Fotografia Europea event. It was an Official Partner of Fotografia Europea and the Emergency Festival. It won two awards: the "Blue Green Economy Award 2025" (Small Businesses**

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category) for the ESG social project "Together we can create a better world - Studio Tre for Rise Against Hunger"; and recognition as one of the "1,000 best-performing companies in the province of Reggio Emilia".

It continued its **support for non-profit associations**, begun in 2021, by promoting new local community initiatives focused on:

- **equal opportunities** (women's Hansa 303 Paralympic sailing class);
- **Environment**: Ogyre's Fishing for Litter campaign, retrieving marine litter worldwide, and the Bike & Walk to Work project, aimed at cutting the CO_2 emissions generated by employees on their work commutes.
- **accessibility and inclusion**: with its redesigned website accessible to people with hearing, visual and cognitive impairment, and support for the **project organised by the A.N.I.C.I.** (Italian National Association for Civilians with Disabilities), which turns mobility into an accessible, concrete and everyday right, helping break down physical barriers and ensure access to essential services for the most vulnerable people.

A summary of such initiatives can be found **in the Company's Impact Report, published on the website:** www.traduzionistudiotre.it).

Today, STUDIO TRE SB S.p.A. draws upon the talent of 21 people who manage a network of 1,500 mother-tongue professionals, to offer language services of the very highest quality in every language in the world.

The mission of STUDIO TRE SB S.p.A is:

- to facilitate communication between people and build productive relationships, breaking down linguistic and cultural barriers;
- to **act with loyalty** and **integrity** toward its clients – conduct shared by the entire staff and by those who work in the name of and on behalf of the Company – in order to offer services with the highest level of expertise, in compliance with current regulations and standards and in line with market prices;
- to invest in the **growth of its people** through training, teamwork and integration;
- to promote a **feeling of belonging and meritocracy**, so that each person feels that their contribution is acknowledged, and that their expectations and aspirations are met;
- to work with **passion** to achieve common goals, while respecting each person's role, offering mutual encouragement and support, looking for solutions and not attributing blame, and contributing towards creating a positive environment;

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- to motivate and guide all our people toward a **client-centric approach**, where each action is targeted towards creating and delivering value, providing top-quality services in line with market prices;
- to encourage everyone to give their contribution through **listening**, **engagement** and **constantly sharing goals and results**;
- **to invest in research and development for the technological innovation of linguistic tools**, constantly monitor data security and confidentiality using advanced cyber security systems, update and implement existing translation software and create a software system that optimises the management of translation and interpreting projects;
- **to create partnerships and synergies with providers of new services in high demand;**
- to set new, challenging goals, find effective solutions and pursue continuous improvement;
- to act in **a sustainable manner** for the benefit of our main stakeholders (employees, clients, suppliers, partners) and the community in which we operate.

Accordingly, the Company has adopted a **Code of Ethics** – hereafter called the Code – which has been approved by the owners.

By signing this Code, STUDIO TRE SB S.p.A, including the people who work in the name of and on behalf of the Company, offers all its clients, vendors, suppliers, etc. the reliability, loyalty, moral integrity, confidentiality and the utmost competence in providing services that comply with mandatory regulations and with due regard for the aforesaid parties.

The Company rejects all forms of discrimination based on religion, sexual orientation, race, political beliefs and social status, and anything else that may diminish individual dignity and interfere with professional growth.

STUDIO TRE SB S.p.A condemns violence or threats of any kind designed to result in conduct that is unlawful and contrary to the principles set out in this Code of Ethics.

The Company has adopted its own Organisational Model in accordance with Legislative Decree 231/2001, updated with the regulatory amendments introduced since then in order to harmonise it with all the provisions that ensure so-called corporate compliance. The Company has also established a Supervisory Board to monitor and maintain the Model.

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GENERAL PRINCIPLES

This Code, which has been approved by the STUDIO TRE SB S.p.A. Board of Directors, describes in detail the obligations with regard to loyalty, integrity and diligence which all those working for or with the Company are required to comply with.

The Code is available to all interested parties, so it can be shared and easily referred to.

The Code can be viewed and downloaded from the Company website.

Any changes to the contents of this Code may be made solely by the Board of Directors. In this case, the Management will inform all interested parties.

Art. I – RESPONSIBILITIES

All directors, employees and vendors working with STUDIO TRE SB S.p.A. must act with loyalty, diligence and integrity, assuming responsibility for their work in compliance with existing legislation.

They must also avoid behaviours that are inconsistent with the principles expressed in this Code and in the applicable Company Procedures, and must promptly report any violation thereof.

All directors, employees and vendors are responsible for the materials, property and equipment provided by the Company, and also for their proper use and maintenance in good working order. Employees must also comply with the requirements set out in the Company Rules and Regulations and Disciplinary Code, observing the ethical principles and standards of behaviour contained therein.

The Company is committed to protecting the environment and contributing to the sustainable development of the local area.

All STUDIO TRE SB S.p.A. activities must be carried out in compliance with environmental laws and regulations.

All directors, employees and vendors shall be held personally responsible for any behaviour which, if contrary to the Company Rules and Regulations and Code, the Company Procedures and the applicable Disciplinary Code under Italy's National Collective Labour Contract, may in any way damage the Company or third parties, and should be aware that such behaviour would immediately trigger every possible effort to obtain compensation for and secure protection against said damage.

All directors, employees and vendors must undertake to comply with the laws and regulations of all the countries in which they work in the name of and on behalf of STUDIO TRE SB S.p.A.

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Art. II – CORPORATE LOYALTY

No director, employee or vendor may use for personal gain and/or advantage the information, property and equipment provided by STUDIO TRE SB S.p.A. for the ordinary performance of their work.

No director, employee or vendor may engage in any activities that could damage the image, financial solidity or moral and legal integrity of the Company. They must also avoid carrying out activities in competition or in conflict with STUDIO TRE SB S.p.A., including through third parties.

No director, employee or vendor may accept promises of favours, personal privileges or offers of gifts or money in order to favour third parties in their dealings with STUDIO TRE SB S.p.A., and will promptly notify the Management if such an event occurs.

In the field of their respective work activities, all employees, vendors, suppliers and all entities operating in the name of, on behalf of or in representation of the Company are required to diligently comply with all applicable laws, this Code, the Company Rules and Procedures and Charter of Values, the applicable Disciplinary Code under Italy's National Collective Labour Contract, and, where applicable, with the accepted standards of professional conduct.
The pursuit of the Company's interests or those of individuals can never justify behaviour that violates the above rules, regulations and standards.

Art. III – CONFIDENTIALITY

All directors, employees and vendors are required to maintain the utmost confidentiality regarding information, technology, contractual affairs, lists of clients and suppliers, procedures and all other matters that constitute an intrinsic asset of STUDIO TRE SB S.p.A. and whose disclosure could damage its assets or image.
When processing personal, sensitive and confidential information on the Company and third parties, all directors, employees and vendors must act in compliance with applicable laws on confidentiality and privacy, avoiding any improper use of said information. The Company operates in full compliance with Italian Legislative Decree 196/2003 on protecting the privacy of individuals and other entities, with specific reference to the processing of personal information.

Art. IV – WORK ENVIRONMENT

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Directors, employees and vendors reject all forms of harassment and undesired or inappropriate behaviour, whether it is
of a sexual, discriminatory, social or racial nature, or which in any way offends people's dignity.
No director, employee or vendor may:
- work under the influence of alcohol or drugs;
- swear, shout or express themselves in a vulgar manner;
- behave in a way that may have an intimidating effect on third parties or colleagues;
- display offensive attitudes towards third parties or colleagues;
- display attitudes whose purpose is to discredit the work or professionalism of third parties, competitors or colleagues;
- behave in ways that may harm the health and safety of third parties;
- allow external staff to access the offices or departments without notifying the Management in advance.

All directors, employees and vendors must operate in full compliance with the applicable laws and regulations on health and safety in the workplace.

In order to highlight the fundamental principles governing the operations of STUDIO TRE SB S.p.A., below are some of the ethical standards and rules of conduct laid down in the Company Rules and Regulations and Disciplinary Code, herein understood as being an integral and inseparable part of this document, which all STUDIO TRE SB S.p.A. employees are specifically expected to comply with:
Performance of work activities – All employees must fulfil their work duties with the diligence required by the nature of said duties and the interests of the Company, in compliance with the applicable qualitative and quantitative criteria and Management instructions for good and effective business performance (a guarantee of corporate success, safeguarding every individual, internal and external, who works with the Company).
Conduct and dress code – All employees are required to act with courtesy and respect towards their colleagues and the Company's suppliers and clients, and to conduct themselves in accordance with civic duties and the principles set out in this Code of Ethics. Everyone has the right to expect and the duty to exhibit decorum with regard to dress and personal hygiene in the workplace. The attire worn in Company offices, when meeting clients, suppliers and vendors, and when officially representing the Company, must be professional, clean, appropriate and neat at all times.
It being understood that it is important to feel comfortable and to respect the freedom and creativity of every individual, to apply common sense and flexibility and to respect religious and cultural beliefs and disabilities, all

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Company employees are required to adhere to an appropriate dress code for their personal image as well as the image of the Company.

The following rules specifically apply, especially during the summer:

- employees are not allowed to wear shorts or Bermuda shorts, mini skirts, tops and tank tops with thin straps, strapless, sleeveless, revealing and see-through dresses, flip-flops. Employees must not expose their shoulders, back and belly.

All employees represent not only themselves but also the Company they work for, and inappropriate attire tarnishes the personal image, professionalism and reliability of the Company itself.

Ban on smoking, alcohol and drugs – smoking is strictly forbidden in all company premises and company vehicles, in accordance with Italian Law No. 3 of 16/01/2003. The use of alcohol and drugs is strictly forbidden in all company premises and company vehicles.

Workplace health and safety – The Company has consistently complied with the regulations relating to accident prevention and safety in the workplace. All employees are required to comply with the aforesaid regulations. The internal manager in charge of compliance with the application of safety regulations will periodically conduct specific inspections and submit any disciplinary warnings to the Company.

Compliance with working hours and absences – Working hours must be adhered to as indicated by the Company in the Company Rules and Regulations and Disciplinary Code.

Damage to the Company image – The employee undertakes not to do anything that could harm the image of STUDIO TRE SB S.p.A., including making comments on the work carried out or on colleagues, vendors and service providers, in any manner and by any means of communication, including online, particularly if defamatory in nature, in full compliance with the employee's duty of loyalty and good faith.

Annual holidays, paid leave, breaks, time off work, overtime, leave of absence, sick leave and parental leave: all employees and the Company are required to comply with the provisions of Italy's National Collective Labour Contract at all times, and, where required, must always act in agreement with Management, corporate policies and Company Rules and Regulations.

Use of personal mobile phones and company PCs: the use of personal mobile phones is forbidden during working hours, except for emergencies and always with prior authorisation from Management. With regard to the use of corporate PCs and the internal network, all employees are required to comply with the rules set out in the Company Rules and Regulations in order to prevent inappropriate and/or improper behaviour from causing harm to the Company, other Employees or third parties who have business relationships with the Company (business and financial partners, suppliers, consultants, contractors, service providers and third parties in general).

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The equipment provided must be used exclusively to perform tasks related to work duties.
In the event of termination of employment, all materials, equipment and tools must be returned to the employer immediately or in a timely manner. Employees are also held responsible for the material and equipment assigned to them in order to perform their work duties.
When **travelling on company business** employees must comply with the procedures and rules set out in the Company Rules and Regulations.
All directors, employees and vendors must operate in full compliance with the applicable laws and regulations on health and safety in the workplace.
STUDIO TRE SB S.p.A. is committed to ensuring the utmost respect for each individual, giving due personal and professional consideration to its vendors and the people it deals with, as well as providing appropriate remuneration, within the prescribed time limits, flexible working hours, by prior agreement, and the appropriate social security payments. The Company is committed to preventing all types of favouritism and nepotism. Furthermore, the Company undertakes not to employ child labour under any circumstances, in compliance with the Conventions of the International Labour Organisation (I.L.O.).

Art. V – RELATIONSHIPS WITH EMPLOYEES AND VENDORS

Employees are hired if the candidate's profile meets the Company's needs, in compliance with legal requirements and the National Collective Labour Contract. No form of irregular work is tolerated.

When a work relationship is established, the person selected for the job receives appropriate information on the standards and regulations, and on pay or remuneration for services rendered, so that acceptance of a job is based on the individual's full knowledge thereof.

The Company avoids all forms of discrimination against its employees and vendors and safeguards health and safety in the workplace, primarily through preventative measures. Furthermore, the Company protects the privacy of said individuals by adopting all the measures and safeguards for the processing and storage of data and information provided for by current legislation.

The Company rejects and prohibits any investigation into the ideas, preferences, personal tastes and – in general – the private lives of its employees and vendors, and is committed to protecting their moral integrity and their right to working conditions that respect personal dignity.

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Employees must not perform any activities that damage STUDIO TRE S.p.A. or are contrary to the official duties and obligations assumed when signing the work contract, and must use the Company's property exclusively to carry out their tasks and duties and to work on Company projects and/or plans. Thus, said property must not be used for personal reasons or be made available to third parties, unless expressly authorised in advance by the Company.

Without prejudice to the obligations and duties prescribed by the laws in force and applicable individual and collective bargaining agreements, all employees and vendors must:

- avoid behaviour that does not comply with the Company's ethics, as defined in this Code of Ethics and which negatively affects the reputation and image of STUDIO TRE SB S.p.A.;
- actively and constantly keep their professional development up to date in their specific field of competence;
- safeguard health and safety in the workplace for themselves and others;
- comply with the directions and instructions given by the employer or supervisor for collective and individual protection;
- immediately report any dangerous situation they become aware of to their employer or supervisor, and in case of emergency, take direct action, in accordance with their position and capability, to eliminate or reduce the gravity of situations of serious, imminent danger and report said situations to the person in charge of safety;
- take part in training and educational programmes organised by the employer;
- undergo the health checks provided for by the legislation in force or otherwise ordered by the doctor in charge;
- manage and use company resources with economy and efficiency, while complying at all times with the latest, most advanced quality standards.

Conflict of interest

All employees and vendors must avoid situations that may create a conflict of interest, and must abstain from taking personal advantage of business opportunities they may become aware of while working for the Company. All employees and vendors who find themselves in a potential conflict of interest must promptly inform STUDIO TRE SB S.p.A. directors and legal representatives, or any manager appointed by them, and refrain from taking any action. They are also required to promptly report any possible or potential conflict of interest involving third parties.

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Art. VI – RELATIONSHIPS WITH THE PUBLIC ADMINISTRATION

Certain behaviours that are part of standard business practice may be considered unacceptable or even in fragrant breach of the law and/or regulations if exhibited toward Public Administration employees, or officials acting in the name or on behalf of the Public Administration.

Therefore:

– No one may accept/offer money, promises of employment or other favours from or to Public Administration administrators, representatives, officials, middle managers or employees or their families, when such action may be interpreted as an attempt to inappropriately gain an advantage, unless it concerns items or services of modest value which do not compromise the integrity or reputation of either party.

– No one may give or promise money or any other kind of service to public officials, workers who provide public services or current or potential clients, whether such conduct is adopted for the exclusive interests of the individual who does so, or to benefit or act in the interest of the Company.

– Likewise, any form of gift, present or granting of benefit to any parties having commercial and/or business relationships with STUDIO TRE SB S.p.A. is prohibited, unless said gift, present or benefit is of modest value and conforms to standard practices and custom.

– In any case, before giving any form of gift, present or benefit which exceeds a modest value, employees and vendors must request the express authorisation of their manager at the Company.

– Furthermore, anyone acting in the name of and/or on behalf of STUDIO TRE SB S.p.A. must refrain from any practice that is prohibited by law, business usage and this Code of Ethics and those, if known, of the public parties they have relations with.

– Any employee or vendor of the Company who receives gifts, presents or benefits as a result of their work must report it to their managers if the value of the gift, present or benefit exceeds the modest value assessed according to custom and usage.

Art. VII – MONEY LAUNDERING

STUDIO TRE SB S.p.A. directors, employees and vendors must not agree to any involvement in operations that could constitute the laundering of money arising from any form of unlawful activity.

Art. VIII – RELATIONSHIPS WITH SUPPLIERS

STUDIO TRE SB S.p.A. selects its suppliers using clear, transparent procedures based on criteria of objectivity, impartiality and fairness, in order to achieve competitive advantage and cost-effectiveness without forgoing technical/economic capabilities assessed according to the specific nature of the services to be rendered.

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The Company gives preference to suppliers who are committed to complying with the regulations in force and with this Code of Ethics.

The Company is committed to establishing business relationships with suppliers based on the utmost loyalty, integrity and transparency.

If STUDIO TRE SB S.p.A. becomes aware that a primary supplier is acting in violation of the principles contained in this Code of Ethics, it will confront the supplier with the facts that the Company has learned, and reserves the right to terminate the supply contract if it includes a termination clause to that effect.
To this end, STUDIO TRE SB S.p.A. hopes that its suppliers will accept this Code of Ethics and is committed to disseminating its principles and content among them, while making every effort to clarify all aspects of the Code and contribute to their application.

Art. IX – RELATIONSHIPS WITH CLIENTS

In their dealings with clients, Company employees, vendors and suppliers – the targets of the standards contained in this Code – must act in accordance with the principles described herein, that is, openly and professionally, while scrupulously adhering to the procedures laid down in the quality system, basing their work on principles of effectiveness and efficiency, as well as providing true, accurate, complete and clear information at all times, and avoiding any form of communication that may prove to be in any way misleading. The Company aims to ensure the highest possible degree of client satisfaction while meeting its business needs.

Art. X – PERSONS COVERED BY THIS CODE

The standards contained in this Code are aimed at and apply to anyone working for the Company and contributing in any way to its business activity.

The Company's management and legal representatives must apply these standards and ensure that they are complied with, taking measures for disseminating them among vendors and employees.

Specifically, the persons covered by the standards contained in this Code are:

- STUDIO TRE SB S.p.A. Shareholders;
- Company Directors;
- Supervisory Board of Statutory Auditors;
- employees, vendors, consultants and all individuals having powers of representation, decision making and/or control;

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- suppliers of goods and services and, in general, anyone who works in the name of and on behalf of STUDIO TRE SB S.p.A.
- clients;
- any business partners.

All persons covered by the Code must comply with and observe its principles. This is a prerequisite for maintaining and continuing over time any kind of relationship established with the Company, whether as an employee, collaborator, consultant, supplier of goods and services, client, etc.

Art. XI – PERIOD OF VALIDITY

This Code of Ethics applies to the conduct of the interested parties after it is adopted by the Board of Directors. To this end, following its adoption this Code will be accessible to all (employees, vendors, suppliers and clients) at www.traduzionistudiotre.it and attached to all contracts signed with employees.

Art. XII – APPROVAL AND ENTRY INTO FORCE OF THIS CODE OF ETHICS

This Code of Ethics has been approved by the STUDIO TRE SB S.p.A. Board of Directors and came into effect on the same day it was approved.

Art. XIII – REVISIONS

Any amendments to this Code of Ethics must be approved by the Board of Directors and brought to the attention of the persons mentioned in paragraph X (Persons covered by this Code).

Art. XIV – SANCTIONS

All STUDIO TRE SB S.p.A. directors, employees and vendors have a contractual obligation to comply with this Code of Ethics and with all applicable laws and regulations.

Depending on the gravity of the offence, failure to comply with the above may lead to various degrees of disciplinary sanctions, which may include termination of relationships of any nature, resulting in possible claim for damages by the Company.

Art. XV – SPECIFIC REGULATIONS INCLUDED IN COMPLIANCE WITH LAWS GOVERNING THE ADMINISTRATIVE LIABILITY OF LEGAL ENTITIES, AS PER LEGISLATIVE DECREE 231/01

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I. ILLICIT PAYMENTS AND CORRUPTION

STUDIO TRE SB S.p.A. prohibits payments of any type to any party, the promise of "favours" of any nature, and any type of prior agreement between Company staff and Public Administration officers and employees, made in order to obtain advantages in the sale of goods and/or services in return, or to further the interests of the Company in its dealings with Public Administration or any other government authority. Any form of payment, promise of favours, grants and prior agreements of such nature, made in any country in the world, are a violation of the Company's regulations and its internal procedures.
Any type of payment, gift or service aimed at influencing, even if only in appearance, the actions of a Public Administration official is also prohibited.

The Company also prohibits "business corruption" which violates Italian law and the laws of many other countries.
"Business corruption" is defined as the offering of an item of value to an intermediary (for example, an employee of a client of STUDIO TRE SB S.p.A.) with the aim of influencing the business conduct of said client.

In this regard, STUDIO TRE SB S.p.A. prohibits any:

- Employee
- Consultant
- Partner/Vendor/Supplier
- Intermediary
- or other individual acting on behalf of intermediaries, agents/consultants and vendors of STUDIO TRE SB S.p.A., or anyone acting directly on behalf of the Company,

from taking part – directly or indirectly – in any activity described as "business corruption".

II. CONFLICT OF INTEREST – GIFTS AND PRESENTS

STUDIO TRE SB S.p.A. staff may not offer or accept gifts intended to influence business decisions or relationships, whether with private or public parties.
Accepting or giving gifts in the form of "bribes" is strictly prohibited. The acceptance or distribution of gifts of "symbolic" value exclusively for promotional purposes is at the discretion of STUDIO TRE SB S.p.A. staff.

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Gifts or presents must be of modest value and, in any case, must not make the recipient feel they are obliged to reciprocate because of the nature and/or cost of the gift. Therefore, such gifts or presents must not be perceived by the recipient as an attempt to corrupt or as an indirect request to exchange favours, etc.
Therefore, STUDIO TRE SB S.p.A. has established the methods and limits applicable to gifts: 149.00 Euro is the maximum value of gifts and presents considered "goods of modest value", which can be made by employees.
Prior to offering gifts and/or presents of modest value, the individual involved must obtain the authorisation of STUDIO TRE SB S.p.A. through the individual's manager.
An expense item must be entered in the "client gift" category and must always be documented and traceable.

However, when this spending limit must be exceeded due to special circumstances associated with local custom and usage, STUDIO TRE SB S.p.A. requires written justification so it can issue special authorisation. To ensure clarity and traceability at all times, this expense must be documented and recorded in accordance with the required procedures. Goods or payments given or received which are not authorised by the Company may compromise possible relationships and be considered illegal.

III. PROTECTION OF PROPERTY OWNED BY STUDIO TRE SB S.P.A. – ACCURACY OF ACCOUNTING BOOKS, RECORD-KEEPING AND PUBLIC REPORTS

Every operation and transaction must be correctly recorded, authorised, verifiable, legitimate, consistent and congruent.
All Company actions and operations must be accurately recorded, and it must be possible to verity the decision making, authorisation and execution process.

Every operation must be backed up by appropriate supporting documentation, so that checks can be made at any time to verify the nature of and reasons for the operation, and identify the person who authorised, executed, recorded and verified the operation.

IV. IT SECURITY

Although Internet access systems and other electronic communications systems are an important tool in daily work activities, they pose additional security risks for employees and the Company.

For this reason, the Company has taken numerous precautions to safeguard the integrity of Company technology and IT data.

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Considering that Internet access puts employees' computers – and the entire Company network – at risk, the Company employs every necessary procedure and tool to carry out these activities.
To safeguard the confidentiality of information and materials that the Company and its vendors become aware of while providing translation and interpreting services, the Company has adopted appropriate cyber security procedures and bespoke confidentiality agreements with clients, suppliers and vendors.

STUDIO TRE SB S.p.A. employees must not use non-Company email accounts to send and receive business information regarding the Company.
Even though STUDIO TRE SB S.p.A. electronic equipment may occasionally be used for personal purposes, it should be noted that on Company communications systems or in relation to information sent to or stored on these systems CONFIDENTIALITY is not guaranteed.

Furthermore, all documents (including electronic messages) are the property of the Company and may be examined by it at any time.

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