



Introduction

Wexplore – Gielle Sas seeks to obtain continuous excellent in the delivery of its services, as well as the highest professional standards. The Ethical Code confirms the Company's commitment towards an ethical behavior in the execution of its commercial and consultancy activities. The Partners and all associates are equally held responsible for their actions as individuals and Company representatives. The principles stated in the Ethical Code reflect the type of conduct and culture we want to embody.

The present code contains the business ethics and conduct rules that the Recipients should observe in the performance of company Activities. This is binding for the behavior of the managers, employees, and consultants; generally speaking, Wexplore – Gielle Sas wishes for its stakeholders to identify with the Code's founding principles, so that they can share them and apply them as the basis for a relationship of mutual trust.

The Ethical Code furthermore highlights those behaviors that the Company deems to be unethical, and that it wishes to discourage.

The Company shall endeavor to communicate to all Recipients the adoption of the present Ethical Code, and recommends the most scrupulous compliance to it.

Specifically, the Company shall commit to:

- Inform all Recipients of the Ethical Code;
- Interpret and clarify the dispositions and Company Procedures contained therewith;
- Verify the observance of the Ethical Code by all Recipients;
- Update and modify the Ethical Code.

The Company has adopted the present Ethical Code both in compliance to the dispositions of the Italian Legis. Decree 231/2001, as well as: to preside over its own reputation and image in the target market; to share its values and the fundamental principles of professional fairness, personal integrity, health protection in the workplace, and transparent market competition from all players. In this perspective, the present Ethical Code shall be considered as an integral part of Wexplore – Gielle Sas' practice; its observance is to be considered entirely part of the contractual obligations of all employees, associates, or any third party having a contractual relationship with the Company.

Values

Quality

We believe in a work ethic made by dedication, commitment, and conscientiousness, in order to perform at the best level for ourselves and for our clients. Operating according to high quality standards contributes to develop our personal and professional skills, and makes us active and attentive listeners to our clients. We want for our clients to be our primary Compliance Officers, and for them to define the standards of our work.

Diversity&Inclusion

Wexplore – Gielle Sas stems from a strong international and intercultural vocation. We want to live this value starting from within. The Company therefore promotes and encourages all the processes and operative decisions which allow to be in touch with people from a diverse cultural background, with whom to achieve innovative forms of synergy. Additionally, the Company also commits to spread its specific know-how in associations and addressing younger generations, in order to ensure that the international experiences they are about to live will generate enrichment and personal growth.

Continuous Improvement and Innovation

Wexplore-Gielle Sas believes that continuous learning and the implementation of improvements and innovations are necessary conditions to work at one's best level and to sustain business continuity, by creating new solutions aimed to address the evolutions and changes in the market and in Stakeholders' needs. Wexplore – Gielle Sas' people identify with the commitment to serve Clients and the community by sharing with them their energy and creativity.

Coherence

We believe that being certified in the commercial application of Hofstede's Models implies the moral duty and the motivation to respect the scientific foundations of our core methodology, and to propose solutions and interventions that mirror and are aligned with such a research-based approach. We further believe that our activities aimed at valuing and managing organizational culture demands that we develop our own corporate culture according to our work principles.

Value

All our values (Quality, Diversity, Learning and Coherence) uphold our key aspiration: to create tangible value for all Stakeholders, Clients, Companies and People, and the communities in which they work and live. Each of these fundamental principles should be expressed in a flexible and pragmatic way, and be implemented in such a way as to have the enhancing and transformational impact expected by those who come into contact with our Company.

Principles

Wexplore – Gielle Sas acts on behalf of strong ethical principles, sustained by a clear individual accountability, in order to promote in all Employees an awareness of the consequences of their own professional choices. Accordingly, Wexplore – Gielle Sas requires that all Clients and Suppliers review the present Ethical Code, and invites them to adhere to the conduct guidelines contained herewith, operating with the maximum mutual cooperation and with the utmost compliance to the principles indicated herewith.

Legality

Wexplore – Gielle Sas operates in compliance with the applicable laws in Italy, based on conducts inspired by the principles of fairness and transparency of any contractual relation. The Company commits to:

- Eliminate any form of discrimination concerning employment and profession;
- Respect every norm disciplining the job market, specifically referring to disciplinary procedures, work hours and salary, health and safety in the workplace;
- Fight corruption in every form it should manifest itself, including extortion and bribery. Specifically, all Company members are expressly forbidden to establish improper relations with the Public Administration. Improper behavior includes but is not limited to: exchange of money, favors or gifts; pressures; release of false statements, or any other fraudulent behavior that is against the law, albeit conducted in the erroneous belief to be advancing the Company's interests and objectives.

Specifically, any employee or Associate of the Company must be careful to avoid situations that can imply a conflict of interests, or that may appear objectionable to others. The conflict of interests has a direct impact on the involved person, limiting or influencing his judgement. Should anyone realize or believe in such a situation, or should they feel awkward in managing a professional situation due to external influences, or should they feel limited in their decisions and in performing their activities, they are invited to report such instances.

Neutrality

Wexplore – Gielle Sas acts based on a principle of neutrality, in order to maintain a constant balance between the specific and general interests of the individuals and the Company, as well as of every User, Client, and Supplier.

The principle of neutrality is the foundation for all those who operate within and on behalf of the Company:

- In the relationship with Employees and Professionals, where the recruitment, hiring, training, compensation, and management of human resources must be based exclusively on merit and skills, avoiding any form of discrimination based on: gender, religion, nationality or ethnicity, cultural or social background, disability or illness, sexual orientation, age, civil status, or political opinions;

- In the treatment of People, who shall not be subject to illicit conditionings or damages, while striving to promote work conditions that allow them to develop their personality and professionalism;
- In the relationship with Clients, in order to provide them with quality services that take into account their peculiarity;
- In the relationship with Providers and other Partners, where the Company does not preclude to anyone in possession of the necessary requisites the possibility to compete for the finalization of contracts, while opposing to any commercial practice that may induce the Partner to subscribe to an unfavorable contract.

Confidentiality

The Company protects the privacy of all Stakeholders and the confidentiality of the information and personal data entrusted to it: all activities concerning data collection, archiving, and treatment may be conducted only by expressly authorized people, operating under the direct authority of the owner, and who shall not make any use of such information for any other purpose than those connected to the Company's activities. Given the high sensitivity of the information and documents treated (including commercial and employment contracts, strategic agreements, organization charts, incentive policies...), all those operating within and on behalf of Wexplore – Gielle Sas commit to observe the strictest privacy procedures to protect the Employees, the Client Companies, and every other Stakeholder.

Should any employee or Associate of Wexplore – Gielle Sas become aware of any confidential information that are not publicly disclosed and that concern the Company or other companies including Clients, Partners or Suppliers, it is their duty to maintain such information confidential and only communicate them if expressly requested to do so, and in any case only if expressly authorized by the Company. Such restriction is valid until the relevant information are not made public, or cease to be private material.

Honesty

Wexplore – Gielle Sas maintains that honesty is a key condition to obtain credibility and establish relationships based on trust with every Stakeholder, thus allowing to improve the industry's dynamics, image, and reputation. Fairness and an ethical business conduct must permeate the actions of Company representatives at every level, both within and outside the Company:

- Following a market approach based on respect, on free initiative, and on regulated competition, for mutually beneficial results with an impact on the community;
- Always acting in a respectful way towards the Company's physical, commercial, and intellectual property, thereby refusing to embezzle any good, data, or professional relationship with Clients and Partners representing a Company's asset, and to be treated as such.

Transparency

The Company conforms to the principle of transparency in the way it operates, communicates, and informs. Such principle is a crucial element to maintain reliability towards internal and external Stakeholders, and is applicable in particular:

- In company governance and in contractual relationships, whether with Clients, Providers, Employees or Partners, which must be fair, clear, and verifiable;
- In determining the costs for the offered services, which must be clearly expressed;
- In the communication of information about the Company, which must equally be truthful, simple, understandable, timely, and accessible to everyone.

It is part of the Company's policy to negotiate in good faith and in all transparency with every potential client and provider. Only Wexplore – Gielle Sas' legal representative may negotiate any changes in the pricing policy, or in the terms and conditions of the stipulated contracts.

Furthermore, Wexplore – Gielle Sas upholds the principle of maximum transparency in transactions, operating in such a way as to contrast money laundering or trade of stolen goods. In order to pursue the maximum transparency in its commercial transactions, the Company performs the relevant controls pursuant to the following principles:

- Qualification of new providers;
- Purchase valuation of new goods and services;
- Valuation of suppliers;
- Monitoring of financial flows;
- Registration of proceeds and of active invoices;
- Monitoring of commercial and marketing activities.

Safety

Wexplore – Gielle Sas commits to observe all legal dispositions in terms of Hygiene, Health and Safety, starting from a careful risk assessment, in order to effectively promote safety in the workplace. All employees and associates are asked not only to scrupulously observe the applicable norms and specific procedures related to their role, but also to commit to proactively coach and lead by example their colleagues, acting as representatives of a culture of safety in the workplace. For the Company, this means protecting the work conditions of all resources, both in terms of their psychological and physical wellbeing, as well as in terms of their dignity. This implies intervening to prevent offensive, discriminatory, or slanderous interpersonal behaviors, and prohibiting without exception all behaviors that represent physical or moral violence, harassment or mobbing.

Sustainability

The Company operates in compliance with all applicable and relevant norms for the protection of the Environment, being aware that all Companies, irrespective of their core business, are called to implement best practices that guarantee an optimal balance between the use of natural resources and their regeneration.

Wexplore – Gielle Sas commits to do its share in protecting the environment and in contributing to the sustainable development of the territory through the use of the best available technologies and the constant monitoring of company processes, in order to ensure energy saving and the lowest possible fuel consumption for the travel of its people.

The pursuit of advantages for the Company, when they involve or may involve the violation of environmental norms, is never justified.

The Subjects of the present Code are:

- The partners of Wexplore – Gielle Sas and all of its Employees;
- The external Associates and Consultants acting in the name and on behalf of the Company.

Where expressly stated, the prescriptions contained in the present Code apply also to those external Stakeholders with whom the Company has a relationship (such as Providers, Clients, Institutions, Partners...).

Wexplore – Gielle Sas wishes for the Ethical Code to enjoy the maximum divulgation to all Subjects and third parties, and for its principles and values to be shared: all employees, associates, and consultants are invited to adjust their conduct to the values, principles, objectives, and provisions contained herein. All Subjects and, when applicable, all Clients, Providers, and other Stakeholders, will be made aware of the dispositions of the present Code; of the related norms; and of the company procedures that regulate every internal function. To this purpose, the Company sets up opportune communication and information initiatives, and invites all Subjects to request any necessary information to correctly interpret the Ethical Code and apply the norms contained therein.

It is the duty of the Company's legal representative to control the compliance, interpretation, and verification of the principles contained in the present Ethical Code, namely:

- To control the application and functioning of the present Code;
- To control the information and training of all Subjects;
- To propose its update following any legislative change and/or evolution in the Company's activities and organization.