



CODE OF ETHICS

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The Code of Ethics is one of the tools of corporate social responsibility for the promotion of good practices of conduct. It does not replace law or contractual provisions, but complements them: there is in fact a certain distance between what the regulations provide for and everyday reality. The Code serves precisely this purpose: to reduce the uncertainty that accompanies decisions. Since one of the fundamental principles at Imagine is precisely that of "choosing" and "deciding", it is increasingly important to establish guidelines to facilitate this process.

The Code is particularly important for a business that provides services to other businesses, like Imagine: the importance that these services have for customers is clear. It is therefore necessary to demonstrate with facts (i.e. with conduct) that we are aware of what is important for customer companies: not only with the efficiency and quality of services, but also with the ability to listen and communicate with customers, and in general with stakeholders.

The Code must first and foremost serve to mould the behaviour of the people who work at Imagine (or for Imagine), but it is also intended to pursue other objectives:

a. increasing internal cohesion and consistency: improving internal relations and creating a unified and clear-cut external image;

b. greater efficiency: the motivation of the participants towards achieving positive objectives increases their ability to produce benefits, both for those directly concerned and for the reference environment;

c. a good reputation: an organisation with good rules and which clearly states its values infuses confidence in its customers, who can thus turn from interlocutors to true partners.

Finally, the Code aims above all to be a guidance tool, useful to help address the ethical dilemmas (which are one with organisational problems and business choices) that arise in everyday business.

Ethical values

Values are the principles with which we identify

Integrity

Imagine is a company in which legality, correctness, honesty, fairness and impartiality of behaviour inside and outside the firm are a shared feeling and guideline for conduct. In sharing these principles, we establish lasting relationships with customers and suppliers, obtain overall transparency in relationships with third parties, ensure appropriate and fair acknowledgement of the work of collaborators.

Imagine is committed to providing all its stakeholders, in a clear, complete and timely manner, with the following information related to actions carried out at all levels.

***Proud to be a Group of
correct and loyal people***

Transparency

For Imagine, being transparent means be willing to establish constructive relationships with persons (no matter if they are customers or collaborators) with the aim of meeting their expectations, clearly explain quotations and prices, and ensuring a trouble-free working environment.

***Sincere and clear
towards all interlocutors***

Personal responsibility

Working at Imagine involves a commitment to establishing a relationship of trust with your colleagues and, more in general, with all interlocutors. It is considered essential to engage sincerely and effectively to achieve the company objectives being aware of one's own tasks and responsibilities.

***Committed together
for the good of the company***

Consistency

Being consistent means everyone should commit themselves to implementing on a daily basis the mission, the values and the operating principles of the company. They are considered to be the fundamental basis not only of strategic planning, but also of our objectives and operations.

***Focused on doing
what we say***

Mission

For Imagine, being the best means representing a reason for pride and trust for the following stakeholders:

- the customers, so that they receive quality services that live up to their expectations, thanks to constant attention to their requirements;
- the women and men who work in the company, so that they can be the protagonists of the results with their expertise, their involvement and passion;
- the shareholders, so that they can be sure that the business continues creating value, in accordance with the principles of corporate social responsibility;
- the suppliers, so that they can be players in the value chain and partners for growth.

Principles of business operation

The lines of conduct that Imagine intends to maintain in order to achieve the strategic objectives it has set itself

Quality and excellence of service

As a solution provider, capable of understanding customer needs and offering high quality services, customer satisfaction is fundamental for Imagine. At Imagine, our daily operations aim to provide a unique and reliable response to customer expectations. Our organisation, professionalism and culture evolve based on what we learn by listening to customers.

Efficiency

Imagine is committed to promptly pursuing the objectives set by introducing the principle of optimisation into every single activity: in the management of human resources, financial and technological resources, and time.

Innovation and continuous improvement

Imagine aims to introduce all aspects of "useful and possible" innovation at various levels - technological, organisational, management and process. Imagine intends to work every day for the maintenance and actual improvement of its business by supporting and promoting the ability to adapt to change.

Involvement and enhancement

Imagine is committed to enhancing the experience and developing the skills of all staff to promote cooperation and knowledge transfer, so that work is a source of satisfaction, pride for people as well as a key factor for the success of the company. Imagine intends to promote, through the culture of dialogue, the dissemination of information and the spirit of belonging to a single, integrated group, rewarding behaviour consistent with its mission and values.

Principles of business operation

Willingness to choose

In pursuing its mission, Imagine will select business areas and development plans to increase its value and to be increasingly competitive in the market. Differentiation on the basis of merit will characterise the process of acknowledgement and enhancement of staff.

General principles and guidelines

Recipients of the Code and operating principles

Recipients of the Code

The recipients of the Code are all those who, for various reasons and with different responsibilities, directly and indirectly achieve the objectives of Imagine.

Ethical values

The reference ethical values for Imagine are as follows:

- Integrity
- Transparency
- Personal responsibility
- Consistency

Principles of business operation

On the basis of its Charter of Values, Imagine relies on the following operating principles:

- value creation and social responsibility;
- quality and excellence of service;
- efficiency;
- innovation and continuous improvement;
- involvement and enhancement;
- willingness to choose.

Definition of ethical behaviour

Ethical behaviour is defined as the way in which the people included in the organisation act in accordance with the system of values.

General guidelines

Compliance with the Code of Ethics

The directors and all Imagine collaborators base their relationships on trust. To this end, their daily conduct is in compliance with the provisions of this Code of Ethics. Any conduct that does not comply with the Code of Ethics is a violation of the trust relationship and must therefore be identified and reported.

Responsibility and decision-making power

Imagine considers the company as the place of responsibility. Everyone's responsibility is all the greater, the greater their authority and discretion in making choices. Consequently, the dissemination and implementation of this Code depend on the commitment of everyone and in particular of those who have the greatest decision-making power and whose conduct is considered to be an example.

Duty to be accountable

Imagine takes on the duty to give account of its objectives, activities and results to its stakeholders by means of tools suitable to disseminate the financial, social and environmental impacts of its business.

Commitment to dialogue

Imagine establishes a dialogue with its stakeholders and their representatives, in the respect of their mutual interests. Everyone is required to respond to requests for dialogue.

General guidelines

Confidentiality of information

Any information on the company activities that has not yet been made public, available to directors and all Imagine collaborators according to their respective duties is confidential and must be used in the exclusive interest of the company.

Potential conflicts of interest

Directors and all collaborators must avoid situations that may represent a conflict of interest between them and the company.

Protection of physical and moral integrity

Imagine protects the physical and moral integrity of all collaborators, ensuring safe and healthy working environments and working conditions that respect individual dignity.

Value of training

Imagine recognises the importance of training as an indispensable factor in increasing the value of the company and the expertise of its collaborators.

Importance of communication

Imagine recognises the value of communication as an indispensable factor for sharing and transferring knowledge as well as for increasing the sense of belonging to the company.

General guidelines

Importance of collaboration

Imagine recognises the fundamental value of collaboration between members of staff and between different organisational structures, based on constant attention to customer satisfaction and on the interest of the company.

Confidentiality of personal data and respect for privacy

Imagine guarantees the confidentiality of personal data in its possession. Directors and all collaborators are required to use the data exclusively for purposes connected with the performance of their duties, complying with the security measures adopted. Imagine guarantees respect for people's privacy.

Care of the environment

Imagine cares for the environment. To this end, it is committed to using the most suitable technologies, preventing environmental risks and reducing direct and indirect environmental impacts.

Sharing the Code of Ethics

Imagine requires all those who collaborate in various ways in company activities to conform their conduct to that described in this Code of Ethics.

CUSTOMER RELATIONS

Definition of customer

A customer is defined as anyone who uses the company products or services in any capacity.

Impartiality among customers

In providing its services, Imagine guarantees fair treatment between existing and potential customers. Imagine strives to achieve the highest possible level of service in all its areas of expertise.

Attention to customer needs

Customer relations are based on openness, respect, courtesy, participation and Imagine is committed to their satisfaction. Recognising the value of listening and dialogue, it establishes tools and channels aimed at ensuring customers the timeliness and quality of information and communication.

Information and communication to customers

Imagine undertakes to inform the customer in a complete and timely manner about features, functions, costs and risks of the service offered. In particular, the communications, contracts, documents and any other information released by Imagine must be:

- clear and simple, drafted in a language as plain and straightforward as possible;
- complete and truthful, so as not to overlook any element relevant to the decision of the existing or potential customer;
- respectful of the provisions on the protection of personal data.

Imagine aims at simplifying procedures by committing itself to reducing the fulfilments required from customers as well as providing any clarification requested.

CUSTOMER RELATIONS

Quality of service provided

Imagine guarantees its customers the highest levels of service quality and is committed to improving them.

Management and communication of the quality of the service provided

Imagine is committed to disseminating the qualitative indicators of its services and reporting the results achieved so that customers can assess the quality of the service provided based on these indicators.

This is why Imagine is committed to:

- adopting quality management systems and defining specific objectives and programmes for improving its service;
- providing customers with all disclosure necessary to identify any possible security/safety risks related to the business and the quality of the service provided;
- promoting awareness-raising and training activities related to service quality;
- making customers aware of how to make complaints and providing appropriate responses to them.

Quality perceived by the customer

Imagine is committed to adopting tools for monitoring and evaluating customer satisfaction, which are the basis for improvement actions.

CUSTOMER RELATIONS

Fairness in contracts and business relations

Being aware of the differences between the markets in which it operates, Imagine guarantees fairness in contracts and business relations.

Imagine also guarantees the fairness of contractual contents towards customers.

Confidentiality in data management

Imagine guarantees that customer personal data are processed in compliance with current legislation and the base values of this Code. It also guarantees that data and information are recorded and processed in a complete, timely manner and with due confidentiality.

Prevention of legal disputes

Imagine encourages dialogue and collaboration with customers and favours out-of-court resolution of possible disputes, promoting conciliation procedures to avoid legal disputes between the company and the customer.

COLLABORATOR RELATIONS

Definition of collaborator

For the purposes of this Code, a collaborator is defined as a person who, beyond the legal qualification of the relationship, has a working relationship with Imagine, aimed at achieving the company objectives.

Protection of the individual and equal opportunities

Imagine avoids any form of discrimination, whether it relates to physical condition, disability, opinion, nationality, religion, sex, sexual orientation and gender identity, or any other condition that may give rise to discrimination.

Personnel are requested to provide information exclusively useful for the assessment of professional and work requirements, while respecting their privacy.

Imagine promotes life-work balance and raises awareness of equal opportunities.

Enhancement of human resources

Imagine guarantees a working environment in which everyone can collaborate by expressing their professional attitude, where responsibility is manifested and shared rules are respected and promoted.

In the working relationship, the company enhances skills, potential and commitment, using clear and uniform evaluation criteria.

Imagine is also committed to enhancing all diversity areas.

Training

Imagine drafts and implements an annual training plan for its collaborators, combining the growth needs of the company with the training needs of the staff and providing the appropriate tools for professional development.

COLLABORATOR RELATIONS

Time management

All those with responsibilities are required to make the most of the working time of their collaborators, who are only required to provide services consistent with the performance of their duties and the needs of the company.

Similarly, all collaborators have the duty to pursue, in the use of their time, the maximum efficiency of the organisation.

Abuse of authority

The hierarchical superior shall not request personal favours or any other behaviour from his or her collaborators that is not provided for in employment contracts and in the provisions of this Code.

Involvement of collaborators

Imagine, and its managers in the first place, promotes a working environment based on information and staff involvement. In particular, it:

- clearly defines company roles;
- requests the contribution of all professional roles to problem-solving, with particular regard to those who work in contact with the customer;
- organises periodic meetings to share company objectives;
- develops appropriate corporate communication tools;
- periodically carries out surveys on the company climate and strives to constantly improve it;
- employs specific management systems.

COLLABORATOR RELATIONS

Protection of health and safety

Imagine is committed to spreading and consolidating a culture of safety among all collaborators, developing risk awareness and promoting responsible behaviour.

This is why Imagine is committed to:

- adopting occupational health and safety management systems;
- defining specific objectives and improvement programmes aimed at minimising accidents and occupational diseases;
- reporting occupational health and safety issues in the performance of its activities.

The company also protects all collaborators from sexual harassment, acts of psychological violence and any discriminatory or harmful attitude towards any person.

Care and efficiency in the use of company resources

Every Imagine collaborator is required to work with the care and efficiency necessary to protect and enhance the company assets, ensuring their use in line with the company interests.

Similarly, it is the responsibility of all collaborators not only to protect such assets, but also to prevent their fraudulent or improper use, for their benefit, for the benefit of third parties or even the company itself.

Conflict of interest

All collaborators must avoid situations in which conflicts of interest may arise. Likewise, they must refrain from taking personal advantage of their position, of the information and discretionary power associated with their role. All collaborators are required to report any situations of conflict of interest in which they may be involved to their line managers.

COLLABORATOR RELATIONS

Protection of corporate image and reputation

Corporate image and reputation are assets that all collaborators must protect with their conduct in every situation, taking into account the changing social context, technology and new tools available.

Different sensitivities and respect for company choices

Given the freedom of opinion of each collaborator and the choices made by the company, everyone's conduct must aim at protecting the reputation of Imagine.

Relationships between colleagues and attention to the collaborator's privacy

Every collaborator is called upon to adopt an attitude towards his or her colleagues based on respect, the protection of personal dignity, collaboration and human solidarity.

Imagine respects the privacy of its collaborators, identifying ways of paying attention to their needs in situations of difficulty that may prevent the normal course of work.

SUPPLIER RELATIONS

Definition of supplier

Suppliers are the people and companies that, for various reasons, provide the goods, services and resources needed to carry out activities and provide services, contributing to the achievement of Imagine objectives. All of them are required to adhere to the goals and principles of this Code.

SUPPLIER RELATIONS

The conduct of Imagine in the procurement of goods, services and works is based on the search for quality and cost-effectiveness and the recognition of equal opportunities for each supplier.

Imagine is committed to establishing relationships with suppliers based on cooperation and communication aimed at the mutual transfer of expertise and information and the creation of common value.

Both Imagine and the supplier should avoid situations of dependence.

Protecting the health and safety of suppliers

Imagine is committed to ensuring, in the forms and ways provided for in the contracts, the protection of health and safety of the staff of the companies involved in its supplies. Imagine ensures that the requirements of these companies correspond from time to time to those required by company qualification procedures and systems.

Supplier selection and qualification criteria

The criteria for the selection and qualification of suppliers are based on correctness and fairness. The selection includes an economic and a qualitative evaluation of performance, an assessment of technical and professional suitability, respect for the environment and social responsibility, according to the rules laid down in specific regulations, procedures and certificates. The shared acceptance of this Code by the supplier is one of the selection criteria.

SUPPLIER RELATIONS

Supplier evaluation

The evaluation of suppliers is based on the criteria set out in the previous paragraph. Imagine adopts specific procedures to assess:

- their conduct;
- their skills;
- their commitment to adjust, and improve their performance.

Tenders

Imagine commits to combining the search for the most advantageous quotation with consideration for the fair expectations of profitability and cost-effectiveness of the supplier.

Imagine gives the right to anyone who meets the requirements to become a supplier, creating adequate conditions of competition, transparency and cost-effectiveness for the management.

Correctness in the management and drafting of contracts

The management of contracts with suppliers is based on fairness, avoiding all possible forms of abuse.

This means that Imagine:

- provides exhaustive information – during the contract negotiation stage – on the characteristics and risks of production, payment methods and times, and other aspects of the relationship of the greatest importance for the supplier;
- uses complete, clear and comprehensible descriptions, avoiding clauses that do not allow for straightforward understanding;
- avoids exploiting its position in the event of situations involving renegotiation of the contract, especially with regard to small suppliers.

SUPPLIER RELATIONS

Gifts and benefits

Imagine avoids giving and receiving gifts that could be interpreted as simply exceeding normal business courtesy or in any case aimed at acquiring favourable treatment for oneself or for companies. Those who receive gifts or other benefits other than those of modest value and as part of ordinary business courtesy must inform the relevant Manager who will return them or donate them to charity in accordance with specific company regulations on the subject.

IMPLEMENTING THE CODE OF ETHICS

Ethical Committee for the dissemination and implementation of the Code of Ethics

All powers in relation to the dissemination and implementation of this Code are reserved to the Board of Directors, which appoints a special Committee made up of at least two people, possibly with an external person, for the implementation of this Code of Ethics. The Committee shall remain in office for three years and may be re-elected.

Limits to Committee scope of action

Commenting on the interpretation of laws, regulations or contractual clauses does not fall within the Committee's competence.

Procedure

If the members of the Committee become directly or indirectly aware of violations of the Code or suspect violations of the Code, they are obliged to inform the Chairperson of the Committee, who, in turn, is obliged to submit the matter to the Committee at its first useful meeting.

The Committee may decide to open a case or dismiss the complaint.

Procedures on reports by third parties

Reports of violations may be made to the Committee as a whole or to any of its members without distinction. They may be made verbally or in writing. If reported orally, the complaint will be formalised in writing at the first useful meeting of the Committee.

If the Committee decides to dismiss the complaint, the reporting person will be informed according to the same procedure used in the reporting stage.