

Code of Ethics

Approved and distributed on 26/09/2012

Coverholder at



1 INTRODUCTION

Rodinò & Partners s.a.s. has undertaken to act in abidance by a principle of fair competition and deontological professional rules in a from a standpoint of qualitative excellence in services provided and advice offered, and aimed achieving a favourable economic result and growth in the stability of the Company.

Rodinò & Partners s.a.s. offers its Clients a complete range of products and services of insurance advice and broking, focusing its offers mainly in the Enterprise segment based on principles of

- a. propriety and transparency in underwriting risks;
- b. Client satisfaction in the matter of price, quality of performance and quality of service;
- c. putting to good use the resources involved in work processes, convinced that the person with their creativity and intelligence is a decisive variable for success in processes of improvement in the quality of service rendered;

Deemed as being non-ethical by the firm of Rodinò & Partners s.a.s. is conduct aimed at:

- Appropriating the benefit or the cooperation of others through position of power or force.
- Non-observance of current laws, regulations and rules.
- Altering the accuracy and truthfulness of the data in its possession.
- Obstructing the functions of oversight by the Public Authorities concerned with this.

2 RECIPIENTS

Recipients of the Code of Ethics are:

- employees and other persons collaborating with the Company.

Rodinò & Partners s.a.s. is confident that Recipients will adopt conduct that is compliant with the values and principles of the Code, by bringing it to the attention of clients, suppliers and civil society.

3 VALUES AND PRINCIPLES

3.1. General principles

Rodinò & Partners s.a.s. directs its activity towards the principles contained in this Code of Ethics while stating that it is free not to undertake nor pursue any relationship with whosoever demonstrates not sharing the content and its spirit and/or violates its principles and rules of conduct.

3.2. *Abidance by legality*

Rodinò & Partners s.a.s sets as a principle that cannot be departed from, rigorous abidance by all regulations in force and the provisions set forth by the Authority for Regulation and Oversight.

Rodinò & Partners s.a.s. makes the utmost effort in doing, so far as this is of its concern, to oppose corruption, terrorism, money-laundering and all forms of crime and ascribes great importance to activities of prevention and repression of fraud against the insurance Market and promotes an “anti-fraud” culture among all Recipients.

Each employee and collaborator is responsible, in so far as it is of their concern, for abidance by the principles of this Code.

3.3. *Protection of and enhancement of persons and democracy of enterprise*

Employed staff are an integral part of Rodinò & Partners s.a.s. and are an essential resource for it.

Managing the relationship of work is based upon respect for the person, propriety and respect for equal opportunities, without any discrimination on grounds of sex, race, religious credo, political opinions, age or state of health.

Safeguarding the moral, and physical integrity of employees is a necessary condition for carrying on working activity: Rodinò & Partners s.a.s acts to ensure protection of health and safety in the workplace and exercise the greatest propriety in managing the relationship of work, in abidance by contracts and laws current in the matter.

A decision to commence a relationship of work or entrust a mandate of collaboration, must be taken on the basis of matching the profiles of candidacies and their specific skills to corporate needs, in abidance by equal opportunities being given to candidate parties.

The information requested must be strictly linked to verifying the meeting of the professional and psycho-attitudinal requirements sought, in abundance by privacy and the politico-social opinions of the candidate.

The objectives, whether general or individual, of employees or collaborators, must be objectively achievable in the time available for reaching them and with the means to hand.

Rodinò & Partners s.a.s. promotes growth in professionalism through activities of training and sharing of knowledge, convinced that an individual and collegial contribution to work processes is something that is indispensable for the development and enhancement of persons.

3.4. *Social and environmental responsibility*

Convinced that it is possible to combine the demands for profitability of the enterprise with abidance by ethical values and safeguarding of the environment, Rodinò & Partners s.a.s pursues an objective of enhancing not only economic, but also the cultural and moral development of local communities and has care for the environmental impact of its activities, paying the greatest attention to the disposal of wastes, consumption of energy resources and emissions caused.

La Rodinò & Partners s.a.s. promotes the dissemination of a culture of solidarity, safety and prevention.

All persons who make any purchase of goods and/or services must act in abidance by principles of propriety, value for money and quality, and act with the diligence of a good family man by verifying abidance by the principles of the Code of Ethics by suppliers, especially with regard to the protection of rights of workers and respect for the environment.

3.5. *Reliability and transparency of the insurance sector*

Rodinò & Partners s.a.s., consistently with the utmost attention given the final client, contributes with initiatives, proposals and actual conduct to augmenting reliability and transparency in the insurance sector, also for the purpose of improving user satisfaction with the quality of products and services offered.

Rodinò & Partners s.a.s. gathers the information necessary from contracting parties for assessing their insurance or retirement needs and proposes contracts that are suited, clear and transparent.

The business is characterised by criteria of professionalism, propriety and equity, with no discrimination whatsoever made in respect of sex, race, religious credo, political opinions, personal or social condition.

Rodinò & Partners s.a.s. holds that dialogue with users is one of the elements of fundamental importance for its competitiveness.

This activity must be performed even over and above abidance by current regulations.

3.6. *Safeguarding corporate image*

The reputation of Rodinò & Partners s.a.s. is an asset of absolute value that allows relationships of trust to be developed with its interlocutors.

Rodinò & Partners s.a.s. is confident that all Recipients will represent it with professionalism, honesty, earnestness and propriety and will act to protect its image.

3.7. *Fair competition and proper advertising*

Rodinò & Partners s.a.s. promotes a culture of fair competition in the markets in which it operates and acts in compliance with current *antitrust* regulations, domestic and community, in relations with Clients, Insurance Companies and colleagues in respect of whom it undertakes to abide by the deontological Code of the A.I.B.A.

The communications issued by Rodinò & Partners s.a.s. are transparent, proper, truthful and suited to not inducing persons to whom they are directed into error and not injures its interlocutors.

3.8. *Protection of personal data*

The handling of personal data is performed with the greatest respect for the dignity of the person concerned and their right to confidentiality and protection of personal data.

La Rodinò & Partners s.a.s. undertakes to deal with this data in a manner that is lawful and in accordance with propriety, gathering only those that are pertinent and to do not go beyond the aims for which they have been collected.

3.9. *Relations with the Authorities of Regulation and Oversight*

The business of Rodinò & Partners s.a.s. is carried on in compliance with the regulations set forth by the Authorities of Regulation and Oversight which are applied with the utmost rigour.

3.10. *Conflicts of interest*

The Recipients of the Code refrain from performing acts wherein they are bearers, even indirectly of interests that are potentially in conflict with those of Rodinò & Partners s.a.s. such as, for example, personal or family interests of a financial or commercial kind with clients, Insurance Companies, colleagues and any other interlocutors.

Staff and collaborators of Rodinò & Partners s.a.s. refrain from giving and/or receiving gifts of any kind or value in the area of relations of work, save for those of symbolic value and compliant with usual commercial practice.

Clients and suppliers of Rodinò & Partners s.a.s. are invited to refrain from giving gifts that might induce the Recipients of the Code into conduct that is contrary to the interests, even moral interests, of the Company.

3.13 Use of IT means

La Rodinò & Partners s.a.s. prohibits any practice that might breach the confidentiality of IT systems of third parties or in any event cause them injury, or is intended to falsify a public or private IT document with evidentiary effect.

4 RULES OF CONDUCT

Rodinò & Partners s.a.s. exhorts the Recipients of the Code to hold to conduct that is responsible and compliant with corporate objectives and consistent with the values and principles set out.

Any act and/or transaction must be legitimate, documented, recorded and verifiable at any time.

La Rodinò & Partners s.a.s. condemns any conduct, on the part of whosoever, aimed at altering the propriety and truthfulness of the data and information held in any document or notice.

Recipients have the obligation to keep to a conduct that is proper and transparent in performing their duties, especially in respect of matters pertaining to any request made by Public Bodies and/or Authorities concerned with verification and/or oversight, holding to an attitude of willingness and utmost cooperation.

Intentionally disseminating false information, whether internally or externally, in respect of Rodinò & Partners s.a.s., its employees and collaborators, clients or other interlocutors is forbidden.

In particular, Recipients who, given the offices held or duties performed, have access to confidential data and information:

- do not notify such data or information to third parties and do not use them for ends outside their office.

4.1. *Employees*

Employees of Rodinò & Partners s.a.s. fulfil their duties with commitment, sense of responsibility, fairness and earnestness in abidance by legal and contract provisions and corporate directives.

Each corporate function is responsible for the truthfulness and originality of the documentation and information given in performing the activities of its concern.

Every employee is to abide by specific corporate provisions in the matter of conflict of interest and inform the legal representative of Rodinò & Partners s.a.s. where there are transactions wherein they have an interest, even an indirect interest, that is potentially in conflict with corporate ones.

They are responsible for preserving and protecting the assists and tools that Rodinò & Partners s.a.s. makes available to them for the proper performance of their work activity, avoiding any improper use of these for ends outside the business.

All are required to abide by confidentiality in respect of data and information learnt during the course of the activity carried on rigorously.

La Rodinò & Partners s.a.s. is confident that its employees and collaborators will conduct themselves with courtesy towards their colleagues and interlocutors.

4.2. *Collaborators*

Rodinò & Partners s.a.s. values the importance of the contribution made by collaborators and advisors in the daily activities of the Company and asks them to act honestly, diligently, earnestly and in abidance by this Code and the instructions imparted in connection with their office.

Rodinò & Partners s.a.s. manages relations with its collaborators in conditions of parity and mutual respect.

Collaborators avoid gaining a personal advantage from the relationship of collaboration, acting only in the interest of Rodinò & Partners s.a.s., and have custody of and protect the personal data they have available to them for the activity entrusted to them in a proper manner.

5.1. Breaches and sanctions

Observance of the Code of Ethics is an integral part of the contract duties of its Recipients.

Breaches committed by Employees of Rodinò & Partners s.a.s. are subject to the current corporate system of discipline; conduct contrary to the Code will be subject to sanctions abiding by a right to defence, based on the gravity of the conduct and on the basis of what is laid down under provision of the law and contract, and may be cause for resolving the contract relationship with Recipients where a relationship of trust were to cease to apply and a grave non-fulfilment of duties of propriety and good faith in executing the contract were to be configured.

In respect of breaches of the Code by employees, corporate rules in the matter of sanctions foreseen in the disciplinary code foreseen under the C.C.N.L. signed by each employee applies.

Naples, 26 September 2012

Rodinò & Partners s.a.s.
The Legal Representative

Dr. Ugo Rodinò di Miglione

This document made up of 8 pages has been read, approved and signed by the following parties: