



Code of ethics

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1 Introduction

1.1 What is the code of ethics?

This code of ethics summarizes the principle of behavior for each partner, consultant, junior consultant and employee in their professional activity.

1.2 Where is it published?

The code is published in our cloud system. If necessary, it is possible to ask for a hard copy in the administration office.

1.3 The reason why we define the code of ethics

For us it's important to communicate our values and ethical principles to all stakeholders. The code of ethics is a complement to the "Privacy Policy", "Terms and Conditions", which are published on our website and in the internal "employee handbook". It describes the company's organizational and technical rules and standards.

The code was elaborated from the whole ROI TEAM and approved by the partners, which are also shareholder. It's not a marketing or communication tool, but an effective leadership tool and a compass to reach the defined goals. For this reason, the code of ethics is going to change over the years to ensure a consistent development in the future.

2 Our values

Our company name refers directly to our values.

ROI describes the hard facts in our business, the know-how and experience gained through more than 710* successful projects (*on December 31st 2017). To gain profits is part of our business, but we aren't driven by profit maximization. A company needs profits to grow and expand its business within a consistent long-term strategy.

The second word of our company name is **TEAM**. We think that a great team is better than the sum of its single members. Each team member has different professional and personal skills to add in different projects, creating an environment of continuous improvement in our company. Consultants have the prejudice to run away after a project, but not the ROI TEAM. We join our customers and build up a powerful team.

The last part of our name is **CONSULTANT**. This word describes the openness and the understanding of the individual challenges of our clients. Courage to say what we think and then to do what we said in a trustful relation. The consultant serves the team, which in turn serves the customer.

3 Our principles

Respect for human inalienable rights is essential. Therefore, the ROI TEAM promotes and defends these rights. We reject in every circumstance any discrimination based on sex, ethnicity, language, religion and every political, social and personal condition. Our company is located in Südtirol/Alto Adige, we have multiple official languages and for us it's important that our team members are multilingual and see cultural differences as opportunities instead of risks.

We as ROI TEAM are independent from other interest groups, therefore also our clients should be independent from us. We don't want to make them dependent on us, but to convince them by the quality of our services.

We basically settle a written project, but besides that we believe in a handshake. The trust arises much sooner than at the handshake. We give confidence and we are happy about that. By default, we grant our clients an exit clause if they are unsatisfied with us during the project. In this case we are getting paid only for the services we delivered until that time, to keep transparency and avoid disputes.

We believe in cooperations with other professionals and specialists to guarantee the best results for our customers.

Our team members are our strengths, which we promote with different benefits and further education opportunities. Experienced consultants integrate younger or junior consultants in different projects to improve their skills and make them gain experience. Junior consultants have in addition a legal right for further education. We as ROI TEAM pay attention for an appropriate work-life balance and organize different events.

As consultants we can care about the environment in different ways. We launched an internal project called "green company" with the aim to optimize some processes to ensure for

example paper and energy savings. Moreover, through different projects in agriculture and tourism we contributed to environment protection.

The fundamental capital in the consulting business is know-how. Therefore, we deal with it very respectful and responsible. We use the information we obtained legally. Information that reaches us without our instigation is not used to gain profit. We never recruit people from our customers and expect the same practice by our clients. Another very important point is the personal data protection. We adapted our Privacy Policy to the general data protection regulation 679/2016. We improved our IT-systems and processes to reach a high degree of personal data protection.

4 Guarantee of confidentiality

We guarantee complete confidentiality to our clients regarding all information we get during the whole consultant process. This confidentiality guarantee is not limited by the duration of the commission.

5 What we're not doing

We don't offer accounting or legal consultancy, although we use our know how in those subject areas for different projects. There are also different limits we aren't exceeding. For example, we would never work for the armaments industry or companies who directly or indirectly do business with those companies. In addition, we avoid projects which meet public legitimate disapproval.

6 Legal framework

We comply with applicable laws. The laws in Italy, Südtirol/Alto Adige where we have our head office are widely harmonized with the EU-laws. If we counsel clients from Austria or Germany, we can base on a nearly uniform legal system.

We are clearly positioning ourselves against criminal acts of all kinds. We assume that our employees act in accordance with the law and do not use any illegal means in their consulting activities.

7 Establishment of this code of ethics

This code was accepted by all employee, partner, consultant and junior consultant with a signature. Everybody had the opportunity to mention their opinion during the realization process of this code and have the responsibility to improve it continuously. Proposals will be discussed together and finally decided by the partners of ROI TEAM CONSULTANT Srl. After a positive decision, the code of ethics will be updated, published on the own homepage and communicated to all stakeholder. During the yearly staff talks, will be checked, if the code of ethics was violated.

8 Whistleblowing

In case of doubt, if a project could be contrary to the code of ethics, it must be consulted by a partner. Any case of suspicion or violation of this code or general laws must be immediately communicated to a partner. This can happen personally, anonym or written. We assume that every whistleblower act in good faith and they are not going to have disadvantages.

9 Disciplinary action

The partners are going to analyze every suspicion by a potential violation of the code of ethics and discuss it with the person who is involved. In case of violation of the code of ethics the partners must decide together which disciplinary action to adopt. This disciplinary action can be a written warning or in worst case implicate a dismissal.

10 Conclusion

A trustful relation to our clients is one of our major success factor. Therefore, we maximize our efforts to keep the risk of shaking that confidence as small as possible. For that reason, this code of ethics is a very important document.

It's difficult to use this code of ethics for every kind of conflicts. We are still humans, we make mistakes and if somebody unintentionally violate this codex they will get a chance to prove themselves.