

## Softphone SRL

Foro Bonaparte 71

20121 Milano

IT 02044860183

Milano, 12 Marzo 2017

## Softphone Code of Business Conduct

This Code, together with its underlying policies, describes what is expected from all our employees individually and as a team - in every market and at every level.

### Introduction

Code of Business Conduct communicates the basic principles that each employee must observe when acting for or on behalf of Softphone. Every one of us is responsible for adhering to this Code and making it an integral part of daily business. The Code focuses on how we behave.

This Code does not anticipate every situation you may encounter; nor does it remove the need for using common sense and professional judgment. We expect you to be committed, entrepreneurial and performance driven and to respect our values, Code and policies. Familiarize yourself with our Code and if you are in any doubt, openly discuss with colleagues or seek guidance from your manager or trusted representative.

### Integrity and Business Conduct

Softphone SRL considers integrity and reliability in relationships with all stakeholders as essential preconditions for sustainable business. Our key elements to integrity and business conduct are:

- To support an open, fair and competitive business environment;
- To comply with all relevant applicable laws and regulations;
- To treat confidential information and not disclose to third parties;
- Conflicts of interest will not be allowed to affect the good operation of our business;
- Gifts and inducements to influence business or other decisions are not acceptable;
- We are committed to the principle of vigorous but fair competition. We adhere to laws and regulations which are designed to ensure effective competition;
- We believe that bribery, in all forms, must be fought and eliminated;
- We seek to do business with parties that adhere to similar integrity standards;
- We expect our suppliers to help us achieve our goals and integrity commitments;
- We expect personal reliability and professionalism from all our employees at all levels and require them to act in the best interest of our Company;
- We expect that all our employees must use and protect confidential and secret information, including personal data, in a careful and professional manner;
- We do not accept any behaviour that is intended to deceive or mislead others. All our employees are required to prevent fraud within our Company and to report any fraud or suspicion of fraud.

## Human Rights

Employees are our most important resource. We work as a team, promote inclusiveness and treat our colleagues with respect and fairness. We safeguard a culture of mutual trust and value of differences of opinion as well as cultural diversity. We embrace clear standards on employees and human rights, such as zero tolerance for harassment and discrimination, child and forced labour and human rights violations.

Softphone SRL endorses the values enshrined within the Universal Declaration of Human Rights and the Core Conventions of the International Labour Organization based on respect for the dignity of the individual without distinction of kind. Our key elements to human rights are:

- Working conditions should allow for safe working practices and support the occupational health of employees.
- Employees should be treated fairly in relation to reasonable working hours, periodic leave and remuneration for work performed.
- To make allowance for negotiations leading to collective agreements
- People are employed based on the principle of equal opportunity, without distinction to race, colour, gender, religion, affiliation or origin.
- Not to use or participate in child, forced or bonded labour, and specifically there will be compliance with the relevant standards of the International Labour Organization.
- Avoid working with suppliers or employment agencies that are known to be making use of forced or compulsory labour in their operation

## Environment

Softphone strives to treat the environment with due care and to comply with environmental and other legislation applicable to its operations in the geographical location. Our key elements to environmental care are

- Great environmental responsibility awareness;
- Promotion of the development and diffusion of environmental friendly technologies;
- Promotion of Smart Working, smart mobility and usage of public transportation.

We continuously work to improve our impact on the environment. We pay specific attention to reducing our consumption of raw materials, water, energy and other resources within our business, as well as lowering waste emissions.

## Responsibilities and Communications

We must all focus on our targets while respecting our values and adhering to this Code. And we expect everyone to promote a culture of openness in which we all feel comfortable raising questions, dilemmas and concerns regarding the interpretation of, or adherence to, this Code.

Remaining silent in the event of a possible violation can only worsen a situation and decrease trust. Therefore, we encourage you to speak to your manager or trusted representative if you ever have a concern or suspicion regarding a possible violation of law, our Code or policies.

Those of us in management positions have increased responsibilities. These include not only implementing the Code and its policies but also leading by example. Creating a transparent and open environment in which concerns or suspicions can be raised without fear of reprisal is essential to preserving our reputation and ability to operate.

### **Disciplinary Measures**

Neglecting or violating the law, our Code, any of the underlying policies or ignoring a violation can have serious consequences for our Company and the individuals involved. A violation may lead to disciplinary measures, including dismissal.

**Alan Lugiai**  
**CEO**  
[alan.lugiai@softphone.it](mailto:alan.lugiai@softphone.it)  
Softphone s.r.l.

