



Code Of Ethics

YUKI ONLUS





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Section I - Prologue

The present Code of Ethics (hereinafter also "Code") have been prepared aiming to assure a clear definition of the YUKI - ONLUS (hereinafter also "Yuki" or "ONLUS") ethical principles and will be the basic elements of the activity, the corporate culture of the ONLUS and the behaviour's standard of all the recipients during the conduct of them activities and of the ONLUS itself. Adopting this Code the ONLUS intends: :

1. Recognize the bind relevance and effectiveness of those ethical principles following described also regarding to the crimes prevention pursuant to Legislative Decree 231/2001;
2. define the ethical principles whom have to drive the activities and the relationships with all the Recipients of the Code, included the internal recipients (to be illustrative and not limiting: the management, the Executives and the employees) and the external as well (to be illustrative and not limiting: all the third parties linked with the ONLUS with particul reference to the consultants which operate in behalf of the ONLUS, the agents or distributors or intermediaries, Commercial Partners, Suppliers and Public Officers ;
3. indicate the ethical principles binding for all the Recipients;
4. define a proper sanctioning system aimed to ensure the effective and concrete implementation of this Code.

The Association, regarding to the scope and carry out of its acitivities absumes as a inspiring principles the abiding all applicable laws and regulation, within a framework of legality, correctness, transparency, confidentiality and, with a view to social responsibility, economically sustainable management over time, respect for the dignity of the person, promotion and enhancement of work, and environmental protection through a correct and responsible use of resources.



Section II - Content of the Code

Art. 1 - Perimeter and recipients

The corporate bodies and their components, the Employees, the Consultants and all the third parties who could act in behalf of the ONLUS (hereinafter also the "Recipients" of the Code of Ethics") have to follow the principles and the provisions pursuant to the Code of Ethics, protecting through their behaviours the respectability and the image of the ONLUS and preserving the integrity of the company assets..

All the Recipients must know the contents of the Code and have to apply the provisions during the relationships with other members of Yuki and also in order to carrying out the external relationships, with particul reference to the relationships with the Public Officers and Public Authorities.

In particular, the members of Directive Council have to inspire themself to the principles of the Code in order to setting the ONLUS goals, as well in each decision or action linked with the ONLUS management.

all those treating in force of an agreement with the Association have to comply the Code's dispositions with their behaviours..

All the Councilors have to ensure the effective implementation and the diffusion of the Code, both internal and external of the ONLUS through the proper communication activities..

To ensure the full application of the Code, each Councilor will provide also to:

- ◆ Monitoring constantly the application of the Code by the Recipients, also through the receipt of the reports of possible violations;
- ◆ reporting to the Directive Council all the ascertained violations of the Code and eventual advices;
- ◆ proposing to Directive Council, if necessary, the review of the Code.

Art. 2 - Respect for the laws

Absolutely binding for all the relationships between the ONLUS, the Directive Council and the all its members and each employees, is the respect of the laws and regulations in force. This committment is extended to the consultants, suppliers and anyone has or intends mantein relationships with the ONLUS.

They will not be started or could be interrupted all the relationships which figure out a violations of the Code's provisions and normative in force. With this purpose, the ONLUS will adopt the organizational instruments evaluated adequate to prevent the violation of the law dispositions in force.



Art. 3 - Spread of the Code

The ONLUS commits itself bring to all the Recipients the present Code, through proper activities of communication (for example through (the delivery to all the stakeholders of a copy of the Code of Ethics, dedicated sections on the website, etc.).

Art. 4 - Yuki's Values

Yuki has adopted a values system which has to be taken as a constant behavioral landmark for all the people act in its behalf.

Yuki intends affirm, even more strongly, the importance of the following principles:

- ◆ Integrity
Yuki commits itself to be an ONLUS where the fairness, honesty, fairness and impartiality of behaviors, both internal and external of the association could be felt as a common way to act and feel. Sharing these principles can build long relationships with the third parties (i.e. Suppliers, Partners and Public Officers) and by this way is possible guarantee fulfill transparency in the relations with them..
- ◆ Coerency
All those who work for the ONLUS are called, at any level, to implement daily, in each action, the mission, values and principles of operation of Yuki.

Art. 5 - Relations with Suppliers

The relationships with the Suppliers are ruled by the present Code of Ethics.

The procurement processes follow the research of the best competitive advantage for the ONLUS and guarantee the same opportunities to the all Suppliers. Therefore, the procurement processes are also based on the mutual loyalty, transparency and collaboration.

The selection of the Suppliers and the procurement terms and conditions are based on an objective evaluation of the quality, the price and the capability to supply and guarantee a proper level of the services.

The choose o new Suppliers are done with the fulfill respect of the impartiality and independence principles and based on a adequate requirements of serietà, qualifica, efficienza ed economicità.

Art. 6 - Assignment of professional appointments to Consultants

The ONLUS adopts criterias for the professional appointments assignment inspired by principles of competence, economy, transparency and correctness.

Yuki commits to avoiding the distribution of illicit advantages to consultants and any preferential treatment linked to kinship, cohabitation or friendship.

The ONLUS applies the rules of the present Code for the choosing and during the relationships with the Consultants.



Furthermore, all fees and / or sums paid to the assignees of the aforementioned tasks must be adequately documented and in any case proportionate to the activity carried out, also in consideration of market conditions..

Art. 7 - Prevenzione di fenomeni potenzialmente legati al riciclaggio e alla ricettazione

Yuki commits itself to guarantee the fulfillment transparency of the commercial transactions and set up adequate internal controls fighting any form of money laundering. The ONLUS must:

- ◆ Verify prevently, with professional diligence, all the informations on the commercial counterparties, Suppliers and Consultants, aiming to clearing their respectability and legitimacy of their business before establishing business relationships;
- ◆ Act in such a way as to avoid any implication in suitable operations, even potentially, to encourage the laundering money and / or assets or other benefits deriving from illicit or criminal activities, acting in full compliance with anti-money laundering legislation.

Art. 8 - External Relations

External communications are based on completeness, transparency and seriousness. Therefore, Yuki commits itself not to use misleading or untruthful advertising tools and to stick to the truth in advertising, commercial or any other communications.

The undertaking of commitments to other private entities is reserved exclusively for functions to authorized parties, in compliance with the strictest observance of the provisions of the law and current applicable legislation and cannot in any way compromise the integrity and reputation of the ONLUS.

The representatives of the ONLUS must not promise or offer to administrators, executive managers, executives in charge of drafting the corporate accounting documents, statutory auditors, liquidators - or in any case to employees in general of third-party private companies - assets or other utilities in order to promote their interests or the interests of the ONLUS.

Acts of courtesy, such as gifts or forms of hospitality, or any other form of benefit, are permitted only if they are of modest value and don't compromise the integrity and reputation of the parties and cannot be interpreted by a third party observer and impartial, as a way intended to obtain advantages and favors in an improper manner.

Art. 9 -Liberality

Liberal activities, which may concern social, sporting, cultural and artistic themes, are only destined for events that offer a guarantee of quality.

In any case, in choosing the proposals to join, Yuki pays particular attention to any possible conflict of interests of a personal or associative nature.

The ONLUS considers favorably and, in the case, provides support to initiatives proposed by public and private bodies and non-profit associations, also through contributions to Foundations,



whose activities are oriented to the promotion of the person and the improvement of the quality of life . These contributions must be provided in strict compliance with the law and the provisions in force and adequately documented.

Art. 10 - Accounting Records and Financial Statements

Yuki pursues its activity ensuring the fulfill transparency in choices made aiming to guarantee correctness and veracity to social communications (financial statements, periodic reports, etc.) and prevent any possible illicit behaviours.

The accounting of the ONLUS is strictly based on the general principles of truth, accuracy, completeness, clarity and transparency of the recorded data.

The structure of the financial statement of the ONLUS guarantees a truth and correct representation of the patrimonial, economic and financial situation, in compliance with the regulatory law.

Art. 11 - Relations with Public Administration

The undertaking of commitments to the Public Administration is reserved exclusively to authorized parties, in compliance with the strictest observance of the provisions of the law and current applicable legislation and cannot in any way compromise the integrity and reputation of Yuki. For this reason it is absolutely binding that the documentation relating to contacts with the Public Administration is collected and kept.

The representatives of the ONLUS must not promise or offer to public officials, and employees in general of the Public Administration or other public institutions, money, goods or other benefits of various kinds in order to promote and promote their and the ONLUS interests, or even to compensate or repay an act of their office or to achieve the execution of an act contrary to the duties of their office.

In the course of a relationship with the Public Administration, opportunities and / or utility of any kind should not be examined or proposed, which may benefit employees of the Public Administration, nor solicit or obtain confidential information that could compromise the integrity or reputation of both sides.

Acts of courtesy, such as gifts or forms of hospitality, or any other form of benefit, are permitted only if they are of modest value and don't compromise the integrity and reputation of the parties and can not be interpreted by a third party and impartial observer as acts intended to obtain advantages and favors in an improper manner.

Any Recipient, who receives directly or indirectly proposals for benefits from public officers, employees in general from the Public Administration or other public institutions has to immediately report to the Directive Council.



Art. 12 – Relations with the Judicial Authorities, the Police Forces and with the authorities with inspection and control powers

Yuki offers the maximum availability and collaboration towards the representatives of the Judicial Authority, Police Forces and that who has inspection powers on behalf of any Public Administration. Therefore, it is not allowed to make statements or induce anyone to make false statements to the Judicial Authority, even in the course of criminal proceedings, to the Police Forces, in favor of the ONLUS.

Therefore, the Recipients of the Code of Ethics are required to promptly comply with any request from the public institutions or competent authorities.

It is strictly forbidden to destroy or alter records, minutes, accounting records and any type of document (paper or electronic).

It is not allowed to try to persuade, through the assignment of professional appointments, dations or promises of gifts, money or other advantages (directly or through a third party), who carries out inspections or inspections or the competent judicial authority.

Art. 13 – Relations with political parties, associations and labor unions

It is strictly forbidden the direct and indirect donation of contributions to political parties, committees, public organizations or candidates to public charges and political subjects and labor unions, except in the forms and ways provided for by law: in particular, it is necessary to check whether the last recipient is one of six subjects mentioned and, in this case, the decision must be taken by the Directive Council.

Art. 14 – Rapporti associativi

Any Recipient of the Code of Ethics must strictly observe the rules in force on the association right – constitutionally guaranteed – for purposes not forbidden to the single person by the Criminal Law.

The ONLUS and any Recipient of the Code refrain from engaging in relationships of any nature, even indirect or through a third party, with subjects (natural or legal persons) who know or have reason to suspect they are part of or carry out support activities in any form in favor of criminal organizations of any nature, including those of the mafia type, those involved in the trafficking of human beings or the exploitation of child labor, as well as subjects or groups operating for terrorist purposes.

Art. 15 – Protection and environmental policy

Yuki strictly observes all the environmental protection rules in force and keeps a proper behaviour, also a behaviour transparent and correct carrying out all the activities which can have an environmental impact.



Art. 16 - Information Technology Management

Any of the Code of Ethics is required to comply with the governance rules of information systems set by the ONLUS.

Art. 17 - Violations of the Code of Ethics and sanctions

The violations of the rules pursuant to the present Code will be punished with proper disciplinary measures, which can reach until the removal from the ONLUS of those responsible, in addition to compensation for any damages deriving from the violations.

The violations committed by Collaborators, Suppliers and Consultants, as well as by all the other parties with whom they have contractual relationships, may lead to the non-fulfillment of primary obligations or disciplinary offenses, with all the effects of applicable law, including the conservation of relationship with ONLUS and may result in compensation for damages..

Art. 18 - Code's Monitoring and Updating

At least annually, the present Code must be under a verification and eventually updating process by the Directive Council.

Art. 19 -Directive Council

The ONLUS encourages all the Recipients to claim the Directive Council in case of doubt relatively to the proper behaviour to have in specific circumstances..

The Directive Council is also deputy to receive the reports in order to the violation, the attempted violation as well, of the Code of Ethics. Therefore is mandatory for any Recipients report without delay any act not in compliance with the principles of the present document through an ordinary mail to:

Directive Council

YUKI - ONLUS.

Via Manzoni, n. 30

20121 - Milan (MI)

The Directive Council adopts adequate measures to guarantee the confidentiality about the identity of the whistleblower. The ONLUS guarantees to the whistleblowers the protection from any form of retaliation, discrimination or penalty and, in any case, is ensured the confidentiality of the whistleblower, except without prejudice to the legal obligations and the protection of the rights of the ONLUS or of those accused wrongly or in bad faith.



Art. 20 - Closing Rules

The specific provisions of this Code are examples of the most recurrent behavior and do not limit the scope of the general principles expressed.