

# H O O D Ψ

active & happiness hotel

## CODE OF ETHICS





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## **Foreword - The Hotel and its Services**

Hoody Active & Happiness is a new concept hotel in Arco, in Garda Trentino.

Overlooking Lake Garda and surrounded by the breathtaking views of the Alps the brand new Hotel, opened in December 2019, is the ideal place for outdoor sports lovers, a base camp for Active holidays.

HOODY is equipped with numerous services designed to make your holiday even more special: video-monitored Bike Room complete with workshop and lockers, in-room energy bars and a list of unique itineraries for every type of bike, breakfast service with food and drinks for all tastes. In addition, the Goody Bar for an aperitif or a snack under the shadow of Arco Castle, and finally the Happiness Terrace, a panoramic terrace with whirlpool, sauna and solarium

Comprising 41 rooms designed to ensure maximum comfort and rest after sporting activities, designed with a minimalist approach, the rooms offer all modern comforts and conveniences.

## **Article 1 - Mission, objectives and values of FLORIDA SRL**

FLORIDA SRL is a company incorporated on 05/11/1986 whose corporate purpose is

- principally: the management, promotion and operation of the hotel business in any form, either directly or indirectly, including on behalf of third parties and on a rental basis.
- as a secondary activity: the purchase, construction, sale, exchange, conduction, extension, renovation and management of real estate of any kind, with particular reference to real estate for hotel use.

The company's mission is to offer its clients a service of excellence, to provide them with the perfect place for an unforgettable family holiday, a romantic getaway, an active

holiday or a successful business event; to this end, Hoody Active & Happiness Hotel has a team of motivated, responsible professionals, capable of constant renewal and innovation for the continuous improvement of its services.

The values that the company promotes to achieve these goals are team spirit, the ability to innovate, social responsibility and loyalty.

## **Article 2 - Purpose**

The purpose of this code of ethics is to define the fundamental ethical principles, rules of conduct and responsibilities that FLORIDA SRL assumes as a binding value and with which all Recipients are required to comply.

The Company has adopted the Code of Ethics which constitutes a tool with which it, in the fulfilment of its mission, undertakes to conform its organisation and the provision of its services.

The purpose of this code is to ethically direct the company's actions and its provisions are consequently binding for the conduct of all the directors of the company, its managers, employees, consultants and anyone who establishes, for any reason, a collaboration relationship with it.

In order to allow for a concrete application of this Code, it will be disseminated within the Company and - as far as possible - externally, in order to give it adequate publicity and application.

The Company undertakes to call for compliance with the provisions of this Code in all the economic relations it establishes.

The Code identifies the prerequisites so that the business activity is inspired by principles of fairness, transparency, diligence, honesty, mutual respect, loyalty and good faith, in order to :

- safeguard all persons involved directly or indirectly in the Company's activities and the interests that they have in relation to decisions, strategic initiatives relating to the aforementioned activity
- ensure an efficient, reliable, correct working method, based on compliance with the relevant regulations and ethical principles deemed adequate, necessary and indispensable for operating within the market and the consequent relations with operators, companies and national and international institutions.

The code presupposes compliance with applicable laws and regulations, as well as observance of company regulations and procedures.

The supervision and control of compliance with the principles set out in the Code is entrusted to the Sole Director.

### **Article 3 - Addressees**

The set of principles set out in this Code must inspire the activities of all those who operate in the sphere of action of the Company, including members of corporate bodies, management personnel, employees, collaborators, consultants and business partners, as well as any other external collaborators in various capacities and external subjects operating in the name of and/or on behalf of the Company.

All Addressees are required to observe and, to the extent of their competence, enforce compliance with the principles contained in the Code: under no circumstances does the claim of acting in the interest of the Company justify the adoption of conduct contrary to those set out herein and, in general, to all applicable legislative and/or regulatory provisions.

The Company shall also

- the dissemination of the Code among the Addressees, through the distribution of copies thereof;
- the interpretation and clarification of the provisions contained in the Code
- the verification of actual compliance with the Code;
- any future updates and implementation of the provisions of the Code.

## **Article 4 - Obligations of the Addressees**

Each Addressee shall carry out his or her work and duties with commitment and professional rigour, honesty, diligence, efficiency, transparency and fairness, making the best use of the tools and time at his or her disposal and assuming the responsibilities associated with the commitments undertaken.

Each Addressee must provide professional contributions appropriate to the responsibilities assigned and must act in such a way as to protect the prestige and image of the Company.

The Addressees shall ensure the utmost confidentiality on the news and information constituting the Company's assets or inherent to the Company's activity acquired and/or processed during the performance of their duties or functions.

The handling of confidential information is governed - consistently with the provisions of the law and applicable regulations - by specific internal procedures.

## **Article 5 - Conflict of Interest**

For the purpose of pursuing the objectives set out in Article 1 above, any situation of conflict of interest between economic, personal or family activities and the company duties held must be avoided.

By way of example but not limited to, the following situations may give rise to a conflict of interest

- having economic and financial interests, including through family members, with suppliers or competitors;
- accepting money, gifts (except within the limits of normal courteous relations and provided they are of modest value), favours or other benefits of any kind from persons, companies or entities that are or intend to enter into business relations with the Company
- exploit one's functional position to realise personal interests, whether or not conflicting with those of the Company;
- initiating negotiations and/or concluding agreements - in the name of and/or on behalf of the Company - whose counterparties are family members or partners, or legal persons referable to the Addressee or in which the same has any interest.

In any case, it is necessary to

- avoid all situations and activities in which a conflict may arise with the interests of the Company or which may

interfere with the ability to take impartial decisions, in the exclusive interest of the Company and in full compliance with the principles and contents of the Code;

- in general, exactly fulfil the functions and duties assigned.

## **Article 6 - Protection of corporate assets**

Each Addressee is required to safeguard the Company's assets, guarding movable and immovable property, equipment, company products, technological resources and computer supports, information and/or know-how.

In particular, each Addressee must

- use company assets according to company policies, scrupulously observing all security programmes to prevent their unauthorised use or theft
- avoid improper use of company assets that may cause damage or reduction of efficiency or, in any case, contrary to the interests of the Company
- keep confidential information concerning the Company secret, avoiding disclosing it to third parties;
- scrupulously comply with the provisions of the corporate security policies, in order not to compromise the functionality and protection of computer systems; in particular, it is forbidden to alter in any way the operation of a computer or telematic system or to unlawfully intervene in any way on data, information or programs contained in a computer or telematic system or pertaining to it to the detriment of the State or a Public Entity.
- keep and not disclose to unauthorised third parties one's personal password and access code to company databases;
- do not reproduce company software for personal use or use the tools provided for private purposes;



- not to send threatening or insulting e-mail messages, not to use uneducated or unprofessional language, not to make inappropriate comments that may cause offence to the person and/or damage the company image.

Each Addressee is responsible for the protection of the resources entrusted to him/her and has the duty to promptly inform his/her direct supervisors of potentially damaging events.

## **Article 7 - Protection of image**

The Company's reputation and image represent a fundamental and inalienable resource.

The Recipients undertake to act in accordance with the principles dictated by this Code in relations with colleagues, customers and third parties in general, maintaining a decorous demeanour in accordance with the high standards typical of companies of the size and importance of FLORIDA SRL.

## **Article 8 - Rules of conduct towards customers**

The Company bases its activity on respect for the rules of competition, on criteria of excellence, efficiency and exclusivity.

The Company assumes the loyalty and trust of its customers as the characterising value of its activity.

The level of excellence of the business activity carried out requires it to do everything necessary to eliminate the causes of conflict with customers and ensures that those in charge of customer relations are adequately trained and informed and that they receive instructions in order to perform their work with diligence and professionalism, in terms of customer care.

## **Article 9 - Rules of conduct towards suppliers, external collaborators and business partners**

The Company's professionalism and commitment characterise the selection of suppliers, external collaborators (including consultants, agents, etc.) and commercial partners, identified from time to time taking into account the capacity of their counterparts, assessing their reliability overall, with reference to the specific nature of the services to be rendered.

In this respect, the Company commits the corporate functions and the Addressees to

- observe internal procedures relating to the selection and management of relations with suppliers, external collaborators and business partners
- observe and enforce compliance with the applicable legal provisions and contractual conditions.

The Company requires its suppliers, external collaborators and business partners to comply with the ethical principles contained in the Code, as well as with any other rules of conduct that may have been drawn up and whose violation may give rise to specific sanctions.

## **Article 10 - Rules of Conduct towards the Public Administration**

Relations with the Public Administration are marked by the utmost transparency and fairness.

The Company is not allowed, directly or through intermediaries, to promise, request, offer or receive to/from public officials, persons in charge of public services or employees in general of the Public Administration, whether Italian or foreign, payments, goods and/or other utilities to promote and favour its interests

and take advantage of them or that are capable of harming the impartiality and autonomy of judgement of the Public Administration.

No form of gratuity or benefit that may be interpreted as exceeding normal business practices or courtesy, or in any case aimed at acquiring favourable treatment in the conduct of any operation related to the company's business, is allowed in relations with public officials and/or persons in charge of public services.

These requirements cannot be circumvented by resorting to different forms of contributions that, in the guise of sponsorships, appointments and consultancies, advertising, etc., pursue the same purposes.

It is, however, permitted that, on special occasions, the Company may, by means of acts of courtesy such as gifts and forms of hospitality, pay homage to representatives of the Public Administration with goods or services of modest value and, in any case, such as to be considered customary in relation to the individual occasion.

## **Article 11 - Rules of conduct in human resources management**

### **A) Recruitment and personnel management**

The Company recognises the central role of human resources in achieving the corporate mission and, consequently, adopts procedures and methods of selection, training and work marked by respect for human values, the autonomy and responsibility of workers as well as the importance of individual and organised participation and adherence to corporate objectives and values.

It is in the Company's interest to foster the development of the potential of each employee or collaborator, promoting an environment, procedures and work organisation that are constantly marked by

- respect, also when selecting personnel, for the personality and dignity of each individual, in order to prevent the creation at any time of situations of discomfort, hostility or intimidation
- the prevention of discrimination and abuse of any kind;
- the enhancement of the innovative and entrepreneurial spirit, while respecting the limits of each individual's responsibilities;
- the definition of roles, responsibilities, proxies and availability of suitable information to ensure that each member of the organisation can take the decisions pertaining to him/her in the interest of the Company.

## B) Integrity and protection of the person

The Company requires that harassment of any kind, such as, for example, the creation of a hostile working environment towards individual workers or groups of workers, unjustified interference with the work of others or the creation of obstacles and hindrances to the professional prospects of others, does not occur in labour relations.

Any employee who believes he or she has been subjected to harassment or discrimination on the grounds of age, gender, sexuality, race, state of health, nationality, political opinions and religious beliefs, etc., may report the incident to the company, which will assess the actual violation of the Code.

The Company aims to create a decent working environment, inspired by the protection of the freedom, dignity and inviolability of the person, as well as principles of fairness in



interpersonal relations, which allows all employees to perform their work to the best of their ability.

In view of this, it is forbidden to:

- consume alcoholic beverages or narcotic substances in the workplace, as these may compromise the good outcome of work performance and damage the Company's reputation and image
- behaving in such a way as to create an intimidating or offensive climate towards colleagues or collaborators in order to marginalise or discredit them in the workplace
- carry out retaliatory or mobbing actions against any employee.

The cooperation of all is required in order to maintain a climate of mutual respect for the dignity, honour and reputation of each person.

In general, staff shall maintain a decorous demeanour in their attitudes, dress, cleanliness and personal order.

### C) Health, safety and environment

In observance of respect for the individual and in compliance with the laws and regulations in force, the Company ensures the creation and management of environments and workplaces that are adequate from the point of view of the health and safety of employees.

Workers must contribute to safeguarding their own safety by complying with the regulations and standards in this respect.

## **Article 12 - Protection of personal data**

Personal data shall be considered all information relating to natural and legal persons, entities or associations, identified or

identifiable, even indirectly, by reference to any other information, including a personal identification number, as well as all data disclosing, inter alia, racial and ethnic origin, political opinions, membership of parties, trade unions, associations or organisations of a philosophical, political or trade-unionist character.

In order to guarantee the protection of Personal Data, the Company undertakes to process the same in compliance with the reference legislation and in particular according to the principles of transparency, lawfulness, quality assurance and correctness of the same.

The Company guarantees the pertinence of the processing of Personal Data to the declared and pursued purposes; Personal Data shall therefore not be processed in a manner or for the pursuit of purposes different from those necessary and in any case permitted under the applicable legislation and with the prior consent of the data subject.

### **Article 13 - Implementation procedures and supervisory programme**

The Sole Administrator has the task of supervising compliance with, adequacy and updating of the Code of Ethics.

More specifically, the Sole Administrator is assigned, among others, the following tasks

- periodically checking the activities carried out within the sensitive processes identified by the Code
- carrying out periodic checks to ascertain the provisions of the Code and, in particular, that the procedures and controls contemplated therein are implemented and documented in a compliant manner and that the principles contained therein are respected



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- verify the adequacy, effectiveness and updating of the Code;
- periodically prepare a report highlighting the problems encountered and identifying the corrective actions to be taken;
- promote initiatives for the training of the recipients of the Code of Ethics, its communication and dissemination

The Sole Administrator shall act in such a way as to guarantee whistleblowers against any kind of retaliation, understood as an act that may give rise even to the mere suspicion of discrimination or penalisation.

The confidentiality of the whistleblower's identity is also ensured, without prejudice to legal obligations.

## **Article 14 - Sanctioning system**

Compliance with the Code shall be considered an essential part of the contractual obligations of the Company's employees, pursuant to and for the purposes of the provisions of Article 2104(2) of the Civil Code.

Violation of the rules of this Code harms the relationship of trust established by the employee with the Company and may lead to disciplinary action and compensation for damages, without prejudice to compliance with the procedures provided for by Article 7 of Law no. 300 of 20 May 1970 (the so-called 'Workers' Statute') as well as by the National Collective Labour Agreements and any applicable special regulations.

Upon receipt of the report on the alleged breach of the Code and after carrying out the appropriate investigations, the Sole Director communicates his assessment to the Board of Directors (and/or the competent company bodies on the basis of the



disciplinary system adopted pursuant to the Decree),  
formulating a proposal on the measures to be taken.

The Board of Directors decides on the possible adoption and/or amendment of the measures proposed by the Sole Administrator and activates the corporate functions/organisational units competent from time to time with regard to the actual application of the measures.

In the event of violations of the provisions and rules of conduct by members of the management body and the control body, the Sole Director shall promptly inform the management body and the control body, respectively, of the incident.

The Recipients of the notification by the Sole Administrator may take the appropriate steps in order to adopt the most suitable measures provided for by law. As regards Addressees other than employees (suppliers, consultants and anyone who has established a collaboration relationship), the Company shall provide, in the relevant contracts, for the right to terminate the relationship in the event of violation of the provisions contained in the Code.