



日本とイタリアの取引を結ぶ NAGAEN connette le relazioni Italia – Giappone

Code of Ethics of NAGAEN Srl

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In Italian	https://www.nagaen.it/codiceetico
In Japanese	https://www.nagaen.it/ja/倫理規定
In English	https://www.nagaen.it/codeofethics
Compliance reporting	compliance@nagaen.it

“Per Aspera ad Astra”

1 Objectives and recipients

1.1 This Code of Ethics (hereinafter the "**Code**") summarizes the principles of conduct within and outside NAGAEN Srl (hereinafter the "**Company**").

1.2 The recipients are the [associates](#), [investors](#), [directors](#), [managers](#), [employees](#), [collaborators](#) of the **Company**, as well as all those who, directly or indirectly, permanently or temporarily, establish relationships or dealings with the **Company** including [Customers](#) and [Suppliers](#) (hereinafter collectively referred to as "**Stakeholders**").

2 Mission of the Company

2.1 The mission of the **Company** is the development of economic relations and collaboration between companies in Italy and Japan through the provision of advisory services and direct management of activities for its Clients or on its own initiative;

2.2 With its work and knowledge, the **Company** intends to contribute consistently and fairly to the economic and social well-being in Italy and Japan, as well as to strengthen relations, economic exchanges and friendship between the two countries.

3 General principles and values

3.1 The **Company** is not limited to maximum observance and compliance with the regulations in force in the territories where it extends its activities or interests. Through the **Code**, it addresses and promotes the following general principles:

3.2 *Anti-corruption*: the **Company** maintains and develops new relationships internally and externally with honesty and fairness and does not admit any corrupt behavior between any representative, body, company, organization or private individual (including former officers and candidates for positions) and its **Stakeholders**;

3.3 *Fair competition*; The **Company** pursues its mission with fairness and transparency without obtaining competitive advantages in an unfair and unethical way;

3.4 *Conflicts of Interest*. Each **Stakeholder** of the **Company** is required to avoid and report conflicts of interest between personal and family economic activities and duties within the **Company**;

3.5 *Confidentiality obligation*. The recipients of the **Code** ensure the confidentiality of the information acquired or processed in function or on the occasion of the performance of their functions;

3.6 *Promotion of Quality*. The **Company** undertakes and is responsible for ensuring and promoting quality in every activity, in line with its long-term strategy;

3.7 *Non-discrimination*; Each **Stakeholder** is a fundamental part in the pursuit of success. The **Company** promotes respect for human resources by not accepting discriminatory behaviors, practices contrary to human rights, dignity and moral and physical integrity;

3.8 *Respect for the environment and animal welfare*; The **Company** aspires to sustainable growth in the interest of all current and future **Stakeholders**. Business and management choices are therefore oriented towards respect for the environment, animal welfare and public health;

3.9 From these principles derive the following values of the **Company**:

**Fairness, Equity Integrity,
Teamwork, Legality, Honesty,
Positivity, Professionalism, Service Quality,
Responsibility, Respect, Transparency.**

4 Relations with Stakeholders

4.1 *Associates, directors, managers, employees and collaborators.* The **Company** undertakes to maintain the utmost correctness, transparency, impartiality and fairness in internal relations;

4.2 *Clients.* The **Company** pursues the maximum satisfaction of its Customers with fast and qualified solutions aligned with requests and sector Best Practices;

4.3 *Investors and the public.* The **Company** ensures transparency and integrity to investors and the community by establishing relationships based on trust;

4.4 *Providers.* The **Company** interacts with suppliers according to the regulations, the best practices of the sector and the KPIs regarding quality and fairness and competitiveness;

4.5 *Public administration;* In relations with the Public Administration, the **Company** undertakes to comply with current regulations and industry Best Practices.

5 Compliance with the Code

5.1 **Stakeholders** refrain from activities, behaviors and acts that are incompatible with the obligations deriving from relations with the **Company**;

5.2 The **Company** undertakes to adopt procedures, regulations or instructions to ensure that the **Code** is respected in the concrete behavior of the **Stakeholders**, providing for sanctions in the event of violations;

5.3 Through the competent people, the **Company** provides all information and documents to those entitled to view.

6 Violation of the Code

6.1 Compliance with the principles summarized in this **Code** is an obligation of all **Stakeholders** of the **Company** and of all those who have business relationships with the **Company**. Their violation is a non-fulfillment of contractual obligations with all consequences provided for by the regulations, including, if necessary, the termination of the contract and compensation for damages;

6.2 This **Code** is periodically checked and updated if necessary;

6.3 Any reports and observations regarding this **Code** can be sent to: compliance@nagaen.it.