



Code of Conduct



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1. Background

The core business of Alitalia Compagnia Aerea Italiana S.p.A. (hereinafter, in short Alitalia or the Company) is to directly and/or indirectly (i.e. by subsidiaries and/or entities and/or consortia) operate air routes and flights for the transport of passengers and freight in Italy, between Italy and other countries and in countries other than Italy. Alitalia's role in civil society is not merely that of an economic actor. It also acts as a reference organisation for consumers and society as a whole in the air transport sector. The number of stakeholders involved is now so high that - on top of economic results - such aspects as quality, image, reliability and, more generally, the reputation of the Company (in terms of ethical, social and environmental responsibility) are of great import.

Establishing and retaining a trustful relationship between Alitalia and its stakeholders implies its compliance with the laws. However legal provisions many not suffice. What is needed is a set of general and specific ethical principles that will guide individual and collective behaviours and choices for the best possible pursuance of the interests involved. Ethics will therefore govern the conduct of Alitalia's corporate bodies, its Management, functional managers, employees, and external contractors on a permanent basis (collectively the "Recipients" of the Code) over and above the requirements prescribed by legislative decree no. 231 of 8 June 2001 (hereinafter legislative decree 231/2001) and the corporate regulatory system adopted by the Company.

2. Purpose

This Code of Conduct (hereinafter also the "Code") governs the full set of rights, duties and responsibilities which Alitalia expressly assumes towards its stakeholders in its day-to-day interaction during the operation of its activity.

The Code of Conduct has the following functions:

- **Preventive function:** codifying the reference ethical principles and fundamental rules of conduct with which all stakeholders are required conform means to expressly state the serious and effective commitment made by Alitalia in order to guarantee the lawfulness of its action, with special reference to the prevention of offences;
- **Cognitive function:** in stating general principles and rules of conduct, the Code identifies any unethical behaviours as well as the correct ways for anyone to exercise their assigned functions and powers;
- **Legitimising function:** the Code expressly describes Alitalia's duties and responsibilities towards stakeholders for the latter to see it as an instrument for their expectations to be met and acknowledged;
- **Incentive function:** in requiring the observance of its enshrined rules and principles, the Code contributes to the development of an ethical conscience and strengthens Alitalia's reputation and trust among and with stakeholders. Similarly, the

reputation of the Company's Management and Personnel and a trustful mutual relationship between these and the Company are centred on the observance of the Code principles and requirements.

The whole set of ethical principles and values contemplated by the Code shall inspire the activity of all those who serve in Alitalia, while bearing in mind the importance of their roles and the complexity of functions and responsibilities vested in them for the fulfilment of the Company's purpose. More specifically, by way of example and without limitation:

- the members of corporate bodies shall be inspired by the Code values and principles in defining the Company's goals;
- the Management and individual functional managers shall put the Code values and principles into practice, by accepting internal and external responsibilities and strengthening their mutual confidence, cohesion and teamwork spirit;
- employees and external contractors shall permanently adapt their actions and behaviours to the Code principles, objectives and commitments in compliance with the applicable laws and regulations.

Ethical guidance is an indispensable approach for the reliability of Alitalia's behaviours towards stakeholders and, more generally, towards the full civil and economic context in which the Company operates. The adoption of a few specific principles of conduct to be observed in relations with the Public Administration, customers and third parties is the expression of the Company's commitment equally in view of crime prevention as per legislative decree 231/2001.

For the foregoing reasons, it is important to clearly define the set of values which Alitalia recognises, accepts and shares and the overall responsibilities it assumes towards internal and external players. This Code of Conduct meets this need in that it contemplates rules to be observed in the behaviours of all corporate actors who are of utmost significance for the Company's good functioning, reliability and reputation.

For the Code to be observed and remain effective, Alitalia has given the Supervisory Board or *Organismo di Vigilanza* (instituted pursuant to legislative decree 231/2001) full responsibilities in the management, implementation, monitoring and control of the Code.

Any updates of the Code shall be resolved on by the Company's Steering Committee.

3. Values

Below are the values that are deemed fundamental, common and fully recognised by Alitalia and on which various stakeholders are required to rely in the fulfilment of their individual tasks and in the performance of their activities in order to ensure the Company's good functioning, reliability and reputation.

Lawfulness

In the performance of its activity, Alitalia shall conform with legislation and any applicable laws and regulations in the territories in which it operates, as well as with the Code principles.

Confidentiality

Alitalia shall ensure that the personal data and information to be processed are kept confidential and that a suitable degree protection will be provided for any acquired information in relation to the specific functions of individual staffs. Any information received from the latter shall not be used for its own interest or in ways running counter to the law or causing harm to the goals of the Company.

Honesty and Fairness

Relations with Alitalia's stakeholders shall rely on such principles as fairness, collaboration, loyalty and mutual respect. The Code Recipients shall perform their activity in the Company's interest and shall not be subject to any type of pressure.

Personal Promotion and Integrity

Alitalia shall protect and promote the value of human resources; this includes contributing to the growth of employees' individual skills and favouring teamwork. Alitalia is committed to promote compliance with a person's physical, moral and cultural integrity, while protecting individual dignity and safe working environments. Alitalia prohibits any form of psychological, physical, sexual and moral harassment towards managers, employees, external contractors, suppliers, customers or visitors. By harassment is meant any form of intimidation or threat preventing the smooth performance of individual functions or the misuse by a hierarchically superior person of his or her authoritative power.

Customer Care and Satisfaction

All of the Company's activities and behaviours are intended to have the highest focus on customers, with the ultimate purpose of achieving optimum qualitative standards in view of their best satisfaction, which also applies to post-sales processes.

Responsibilities towards Citizens

Alitalia shall operate with due account taken of the requirements of the citizens it serves and contribute to their economic, environmental, social, cultural and civil development.

Transparency

Alitalia shall clearly and transparently disclose to all stakeholders its operations and its financial position and performance, whenever such disclosure requirement is prescribed by the law and/or deemed of interest, without favouring any specific individuals or groups of interest.

4. General Principles

Alitalia shall disseminate at all levels a culture marked by the awareness of the existence of rules and by the acceptance of a mentality oriented towards the exercise of control in order to:

- efficiently manage activities;
- provide complete and accurate accounting, financial and operational data;
- protect corporate assets;
- ensure the observance of laws and corporate procedures.

4.1 Internal Procedures

Code Recipients are required to observe the rules, roles and responsibilities defined by the system of delegations and acts in general within the Company.

4.2 Internal Controls

A positive attitude towards controls at all levels by corporate bodies and by the Management shall be promoted and incentivised, considering the contribution given by controls to the improvement of efficiency.

By internal controls are meant all instruments needed or useful to drive, manage and review the corporate activity in order to ensure compliance with the laws and corporate acts, protect corporate assets, efficiently manage activities and provide complete and accurate accounting and financial data.

In the performance of their functions, the Company's personnel shall be responsible for the correct functioning of the control system through controls at business line level, formed by a set of review activities performed by individual Departments, Functions or Organisational Units on their internal processes.

4.3 Accounting Records

Alitalia shall provide training to the Code Recipients so that the truthfulness, relevance, completeness and correctness of the information concerning its operations and its financial position and performance be guaranteed both within and outside the Company.

To that end, any transaction shall correctly and promptly be traced and recorded in the corporate accounting system in accordance with the methods provided for by the law and the applicable accounting principles; each transaction shall be authorised, verifiable, legitimate, consistent and appropriate.

For the accounting system to comply with the requirements of truthfulness, completeness and transparency, full documental evidence substantiating any performed activity shall be kept by the Company so as to enable:

- the tracking and recording of each transaction in the accounting system;
- the immediate determination of the characteristics and information underlying such transaction;
- an easy formal and chronological reconstruction of each transaction;
- the review of the decision-making, authorisation and implementation process, as well as the identification of different levels of control and responsibility.

Each accounting record shall exactly reflect the contents of substantiating documentation. As a result, the Code Recipients shall be responsible for the documentation to be easily retrievable and sorted in accordance with logical criteria and in compliance with corporate procedures and instructions.

No payment in the interest and on behalf of Alitalia can be made without suitable documental evidence and a formal authorisation. Managers, employees and external contractors who should discover omissions, counterfeits or negligence in accounting records or in documental evidence are required to promptly report such nonconformities to their immediate superior or the Supervisory Board.

Any external advisors shall report directly to the Supervisory Board limited to the activity performed on behalf of Alitalia.

5. Principles of Conduct in Relations with Shareholders

Alitalia shall ensure its current and future shareholders that its action will at all times be transparent during the performance of its activities. Alitalia shall further recognise their right to be informed on any circumstance deemed significant or of interest for the overall corporate economy, over and above the cases provided for by the applicable legislation.

To that end, it shall establish suitable information flows – from subsidiaries and operational functions to the top management and from the latter to shareholders – in order to ensure that information is constantly updated and comprehensive.

6. Principles of Conduct in Relations with Managers and Employees

The respect of persons and their professional development are considered prominent values for Alitalia, together with the relational, intellectual, organisational and technical skills of each manager or employee.

In the awareness of and as a supplement to such fundamental values, the Company shall also be inspired by the following key drivers.

6.1 Personnel Selection

Personnel search and selection shall solely rely on criteria of objectivity and transparency, which will go hand in hand with the respect of equal opportunities and the need to avoid any preferential treatment.

6.2 Establishment of Employment Relationships

Recruitments are made by a regular job contract in full compliance with the law and any applicable Collective Labour Agreement, without overlooking the need to favour workers' inclusion in the working environment.

6.3 Personnel Management

Alitalia shall establish an integrated system of human resource management and development, whereby the full personnel, under the same conditions, will be given the same career and professional growth opportunities.

The essential prerequisite for task assignment within the corporate organisation and for progressive career development is the evaluation of demonstrated personal skills and achieved results, as well as of potential individual skills in full accordance and consistently with the Company's current and future needs.

Anyone feeling having been discriminated on any ground may report the case to the Supervisory Board. No reprisal against the manager or the employee having reported a case of discrimination will be allowed.

6.4 Health and Safety

Alitalia puts special focus on the creation and management of working environments and places suited to the safety and health of its managers and employees in line with any applicable national or international standards.

In addition, Alitalia will not tolerate:

- the consumption of alcoholic beverages, narcotics or hallucinatory substances affecting the work activity within the Company;
- smoking in no-smoking areas, since Alitalia's no-smoking policy was duly communicated to all white-collar and blue-collar staffs, in compliance with the reference legislation.

6.5 Privacy Protection

Alitalia shall conform with the applicable prescriptions on the confidentiality of personal data as per legislative decree no. 196 of 2003 ("Personal Data Protection Code" as subsequently amended, supplemented and enforced by implementing regulations).

With special regard to the processing of workers' personal data, Alitalia shall use specific precautionary measures in order to inform each manager, employee or external contractor on the nature of the personal data processed by the Company, processing methods, communication scopes and, more generally, any information concerning him or her.

6.6 Recipients' Duties

6.6.1 Diligence and Good Faith

Each Code Recipient shall act loyally and in good faith, meet the obligations prescribed in his or her employment contract and fulfil his or her work duties.

Code Recipients shall also know and observe the rules of professional conduct contained in the Code, and behave in accordance with mutual respect and cooperation. The Alitalia staff, irrespective of their exercised function and/or the acquired level of responsibility, are required to be aware of and implement the applicable provisions on environment protection, occupational safety and hygiene and privacy protection.

6.6.2 Conflict of Interest

Each Code Recipient shall ensure that each decision made within his or her scope of activity is made in the interest of the Company and in compliance with the plans and guidelines of corporate bodies. Any situation of conflict of interest between personal or family business activities and corporate functions of the staff concerned ought to be avoided.

By way of example, the following situations may determine a conflict of interest:

- the manifest or concealed existence of economic and financial interests of the personnel and/or their respective families in suppliers' activities;
- the use of information acquired in the fulfilment of working activities to one's own advantage or to the advantage of third parties and to the detriment of the Company's interests;
- the provision of manual or intellectual services of any kind at the sites of customers, suppliers, third parties – to the detriment of the Company's interest;
- the acceptance of money or other advantage or benefit from parties other than the Company for doing acts either within the scope of or contrary to his or her official duties;
- the acceptance of gifts, donations, hospitality or other advantages, unless the value of the same does not exceed limits ascribable to ordinary courtesy and is however modest and gifts are such as to be considered customary and recurrent; such provision shall also apply to the countries in which offering gifts of high value is customary;
- misuse of the staff's function for the fulfilment of interests running counter to those of the Company;
- the initiation, conclusion or execution of negotiations and/or contracts in the name and/or on behalf of the Company, in which the staff's family is involved as counterparty.

Before accepting a counselling, management or administration assignment or any other tasks for the benefit of an entity other than the Company, such as to potentially be in conflict with the Company's interests, each manager and employee is required to notify his or her immediate superior or the Supervisory Board thereof.

6.6.3 Protection of the Company's Assets

Alitalia's managers and employees are responsible for the protection of their entrusted corporate resources and are required to promptly inform their immediate superiors of any events that are potentially harmful for the Company.

- In particular, all Company managers and employees are required to do the following:
- to operate with diligence in order to protect the Company's assets through accountable behaviours and in line with the Company's policies;
 - to avoid the improper use or tampering of the Company's assets that may result in damage or reduced efficiency or however may conflict with corporate interest.

Managers and employees are required to scrupulously adopt the provisions of corporate safety policies so as to avoid impairing the operation and protection of IT systems.

More specifically, all of the Company managers and employees shall without limitation:

- use the information processed in the company ICT systems, including emails, on the terms and within the limits stated by the Company;
- use ICT tools correctly, and specifically avoid any collection, archiving and disclosure of data and information for purposes other than the Company's activity;
- use ICT tools without altering the hardware and software configurations provided by Alitalia;
- refrain from sending insulting or threatening email messages, from using obscene or gross language, and from making comments that may offend persons and/or cause harm to the Company's image;
- avoid sending commercial and advertising communications, which amount to an improper use of the Company's ICT network;
- avoid surfing in obscene or offensive websites and websites with contents contrary to public morals or to the law or, however, not strictly associated or related to their work activity;
- avoid using Alitalia's mobile phone lines and landlines for purposes other than those of disclosed corporate policies;
- avoid making unauthorised copies of licensed programs for corporate use or for third parties.

Any voluntary or involuntary use of these assets for unauthorised purposes may cause serious harm to Alitalia and result in the potential infliction of sanctions or initiation of disciplinary proceedings against the responsible managers or employees.

7. Principles of Conduct in Relations with Customers

Alitalia purports to make its conduct in relations with customers compliant to the principles of transparency, reliability, accountability and quality.

For instance, each Code Recipient is required to behave as follows:

- scrupulously observe the Code provisions and internal procedures related to the management of relations with Customers;
- make sure that services offered are qualitative and reliable;
- efficiently and courteously provide accurate and exhaustive information on the contents, price and terms of delivery of services to be provided, for customers to be able to make informed decisions;
- make sure that their advertising communications or other types of communications are truthful and designed to prevent any deceitful practice.

Alitalia undertakes to ensure suitable quality standards in its offered services based on clearly defined quality levels and to use modern methods for reviewing and measuring customer satisfaction in order to introduce possible remedial actions and improvements (e.g. a Service Charter, direct contacts with customers and market surveys).

In addition, the Company shall always provide feedback to suggestions and reply to claims and complaints from consumers and consumers' associations, by using suitable and prompt communication systems (e.g. by phone, fax, email, snail mail and internet websites). To that end, Alitalia has also established dedicated organisational units and a system measuring customers' perceived quality, which helps check the level of compliance with qualitative standards with customers.

8. Principles of Conduct in Relations with Suppliers and Trade Partners

8.1 General Conduct towards Suppliers and Trade Partners

Alitalia purports to make its conduct in relations with suppliers and trade partners compliant to the principles of transparency, equality and loyalty.

For instance, each Code Recipient is required to behave as follows:

- observe and comply, in relations with suppliers and partners, the applicable legal provisions and contractual terms;
- scrupulously observe internal procedures on the selection and management of relations with suppliers and partners;
- obtain the collaboration of suppliers in ensuring customer satisfaction in terms of quality, cost and delivery time for the provision of goods and services;
- observe the principle of transparency and completeness of information in the correspondence with suppliers and partners.

8.2 Choice of Suppliers and Partners

Processes for the selection and choice of suppliers and partners shall be centred on maximising advantages to Alitalia and the need to protect the Company's image. To that end, the Management - as well as any Company manager and employee in charge of the corporate functions participating in such processes - are required to adopt the following behaviours without limitation:

- grant suppliers and partners having the necessary requirements equal opportunities to participate in the selection;
- ensure the participation in any competitive bidding procedure of a sufficient number of suppliers in accordance with the applicable company policies;
- check through - *inter alia* - suitable documentation, that suppliers and/or partners have the necessary financial and non-financial means, organisational facilities, technical skills and know-how, quality systems and resources suited to the Company's needs and image.

8.3 Integrity and Independence in Relations with Suppliers and Partners

Relations with suppliers and partners shall be centred on general ethical behaviours, as described in the previous paragraph 8.1 of this Code, and shall be constantly monitored by the Company.

In particular, in managing relations with suppliers and partners, especially for the purpose of ensuring integrity and independence, suppliers or partners should not be solicited to execute a contract/agreement on terms that would be unfavourable to them while offering them the prospect of executing a subsequent contract/agreement on more favourable terms.

8.4 Disclosure of the Code of Conduct to Suppliers and Partners

Alitalia shall ensure the circulation of this Code among its suppliers and partners and make them aware of the need to comply with its principles and to avoid conducts that may cause the Code Recipients to be in breach of the same.

8.5 Donations and other Advantages received from Suppliers and Partners

Code Recipients shall avoid directly or indirectly receiving the following (e.g. from their family members, friends and acquaintances):

- any money of other advantages or benefits from parties other than Alitalia for doing acts either within the scope of or contrary to his or her official duties;
- gifts, donations, hospitality or other advantages, unless the value of the same does not exceed limits ascribable to ordinary courtesy and is however low and the gift is customarily given on recurring occasions.

Code Recipients shall not accept gifts or other forms of benefit that are not in line with the foregoing prescriptions. In any case, they are required to inform their immediate superior or the Supervisory Board thereof.

9. Principles of Conduct in Relations with the Public Administration

9.1 Public Administration

Alitalia's relations with the Public Administration are centred on the maximum degree of transparency and fairness.

In particular, Alitalia shall maintain the necessary relations with State agencies in Italy or other countries in compliance with respective roles and functions as provided for by the law; it is understood that such relations will be highly collaborative.

Relations with officers of public institutions are limited to the Company's functions dedicated to maintaining such relations and shall be regularly authorised on the basis of the highest degree of compliance with legal and regulatory requirements. Any relations of this type may by no means impair the Company's integrity and reputation.

To that end, Alitalia shall not offer - either directly or through intermediaries - any sums of money or other equivalent payments to public officers in charge of public services in order to influence their activities in the fulfilment of their duties.

Such prescriptions may not be eluded through different forms of remuneration, such as sponsorships, assignments and advisory services, advertising services and similar compensations having the same illicit purposes as those referred to above.

Any gestures of courtesy such as gifts and forms of hospitality towards representatives of the Public Administration or public officers will be allowed provided their value is modest and gifts are such as to be considered customary and recurrent. Similar gestures shall in any case be made in such a form and on such terms as to avoid impairing Alitalia's integrity and reputation or influence the autonomy of the Code Recipients' judgement. Such provision shall equally apply in countries where offering gifts of high economic value is customary.

9.2 Supervisory and Judicial Authorities

Alitalia shall act in compliance with the law and favour the correct administration of justice within the limits of its responsibilities.

In the performance of its activities, Alitalia shall cooperate with the representatives of Judicial Authorities, Police Forces and any Public Officer with inspection powers, and provide the same with any of their requested information in complete, fair, suited and prompt manner.

Alitalia will require Code Recipients to offer the maximum degree of assistance and cooperation to anyone received in the Company's premises for the purpose of inspections and controls on behalf of Regulatory and Supervisory Authorities.

When judicial proceedings, enquiries or inspections by Public Authorities are expected or imminent, the destruction or alteration of records, minutes, accounting entries and any documents will be strictly forbidden.

9.3 Institutional Relations

In relations with national, EU and international institutions, Alitalia shall:

- establish permanent and stable communication channels with all institutional entities involved during the performance of its activities with no type of discrimination;
- represent its interests and positions in a transparent, rigorous and consistent manner, while avoiding collusive behaviours;
- act in compliance with the principles defined by the Code in the performance of its activities, and avoid exerting direct or indirect pressure through its managers, employees or external contractors on the accountable persons or representatives of Institutions in order to obtain favours or advantages.

10. Principles of Conduct with other Entities

10.1 Economic Relations with Parties, Unions and Associations

Alitalia shall provide no type of direct or indirect financial contributions to political parties, movements, committees and political or union organisations, or their

representatives or candidates, whether in Italy or abroad, save for any contributions due in compliance with specific legal provisions.

Alitalia shall refrain from any direct or indirect pressure on political or union representatives through Code Recipients, who, in turn, will not be allowed to engage in political activities during working hours, or use the Company's assets or equipment to that end. Code Recipients shall also make clear that any expressed political opinions are strictly personal and are therefore not representative of the Company's opinion and beliefs.

In relations with other groups of interest and associations (e.g. professional associations or environmentalist associations) no representative of the Company shall promise or pay sums, promise or grant contributions in kind or other personal benefits in order to promote and favour the Company's interests.

10.2 Public Funding and Subsidies

Alitalia may not derive any advantages from its relations with the Public Administration, unless this is made through the lawful execution of contractual relations, any lawfully obtained measures and/or subsidies of any kind which are legally obtained and are intended for the exact purposes for which they were granted.

In particular, Code Recipients are required to behave in such a way as to avoid:

- the illicit granting to the Company of contributions, subsidies, financing or other similar financial aid however termed, which aid is granted or disbursed by Public Bodies through the use or presentation of falsified or untruthful documents or through the omission of information to be disclosed or through artifice or deception;
- the use of any contributions, subsidies, financing or other financial aid of the same type however termed, which is obtained by the Company for purposes other than those for which it is granted.

10.3 External Communication and Information

Alitalia is committed to provide media with information that is consistent, conforms with its policies and programmes, is truthful, mutually coherent, transparent and without ulterior motives.

To that end, relations with the press and the other media shall exclusively be under the responsibility of the President, the Managing Director and the competent corporate functions. This provision also fulfils the fundamental need for confidentiality normally required by such type of internal information.

Any information on the Company's objectives, results and points of view shall be disclosed by the President, the Managing Director and the Top Management.

The organisation of public announcements and events, including media events and announcements, the participation in conferences, congresses and seminars, the compilation of articles and papers shall be authorised by the relevant Top Management, provided that any prepared texts and reports, where needed, in relation to the themes to be covered, are coordinated with the competent functional Manager.

11. Terms of Implementation and Surveillance Programme

The Code terms of implementation are under the responsibility of the Supervisory Board, which will be required to fulfil the following functions:

- monitor initiatives for the dissemination of knowledge and understanding of the Code of Conduct, while guaranteeing – in particular – the development of communication and training activities;
- monitor the Code implementation by all parties concerned, by taking due account of and assessing any received reports and notices;
- inform the Company's competent Departments/Functions/Organisational Units of any breaches of the Code by the Company's personnel for them to adopt the necessary remedial measures;
- fulfil, when required, a consultative function in the course of a disciplinary procedure;
- provide advices and opinions in relation to any revisions of corporate policies and procedures in order to ensure their consistency with the Code;
- propose, where necessary, any revisions of the Code.

11.1 Communication and Training

The Code of Conduct is disclosed to the Company's stakeholders by suitable communication activities.

In order to ensure the correct understanding of the Code among all managers, employees and external contractors of the Company, the Supervisory Board, in association with the Human Resource Department, shall organise training programmes intended to favour the knowledge of ethical principles and rules.

11.2 Reports from Stakeholders (Whistle-blowing)

All of the Company's stakeholders shall have the opportunity to report - in writing and without anonymity - any breach or suspected breach of the Code to the Supervisory Board through reserved information channels. The Supervisory Board will in turn analyse the report and if need be, consult again the whistleblower and the person having allegedly breached the Code.

To that end, reports shall be sent to the dedicated mailbox odv.231@alitalia.it.

A report can also be advised verbally or sent in a closed envelope to be marked "restricted" to:

Organismo di Vigilanza di Alitalia S.p.A.
Piazza Almerico da Schio Pal. RPU
00054 Fiumicino (Roma).

Reports shall be kept by the Supervisory Board in accordance with the terms prescribed by its Regulation.

The secrecy of the whistleblower will be guaranteed, except as otherwise mandatorily provided for by the law.

11.3 Effectiveness of the Code of Conduct and Consequences of Code Breaches

The observance of the rules of conduct prescribed by the Code shall be considered an essential part of contractual obligations imposed on the Company's employees, pursuant to article 2104 of the Civil Code, as well as on its managers and external contractors.

Any breach of the Code shall amount to a breach of the obligations arising from the employment/contract relationship and/or to professional misconduct punishable by disciplinary action, with any consequence applicable at law in relation to – *inter alia* – the continuation of the employment/contractual relationship.

Alitalia shall consequently apply and inflict sanctions that are proportionate to the perpetrated breach with impartiality and uniformity and in compliance with the applicable regulatory provisions on labour relationships.

Any inflicted disciplinary measures and sanctions shall be respectively applied and inflicted in full compliance with art. 7 of law no. 300 of 20 May 1970 and with any other applicable legal provisions or provisions of the relevant collective labour agreement.

