

# THE GOOD IDEA



Certified  
**(B)**  
Corporation

## Code of Ethics

June 2026

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## CODE OF ETHICS

### Art. 1 – Purpose and Scope

The purpose of this Code of Ethics is to set out and reaffirm the core ethical values and general principles that inspire The Good Idea, and which all employees must observe when performing their duties and functions. These values and principles are in line with the Ethical Trading Initiative (ETI) Code and the UN Global Compact Principles, to which we adhere.

.....  
We must all commit to ensuring that the company's activities are conducted in accordance with the law, and that values such as loyalty, diligence, integrity, and fairness form the cornerstones of our corporate culture.

This Code of Ethics reaffirms to all company employees the distinctive values that underpin The Good Idea's activities and relationships, and which must be respected.

The Code applies to all individuals working with The Good Idea, regardless of their relationship with the company. Consequently, directors will bear significant responsibilities, as they will be tasked with acting in a manner that demonstrates the importance and binding nature of the principles set out herein.

### Art. 2 – General Provisions

The company's management must adhere to this Code when pursuing projects and investments aimed at increasing the company's value, applying the principles of sound and prudent management. The company recognises the central importance of human resources in the success of any business and is committed to fostering an environment of fairness and trust between employers and employees.

### Art. 3 – Working conditions

The Good Idea offers equal employment opportunities to all employees based on their professional qualifications and performance. The relevant departments select, employ and manage staff according to criteria of competence and merit, regardless of country of origin, religion, gender, age, social status, disability or length of service. This approach respects individual rights and complies with applicable laws and regulations, paying particular attention to current legislation on child labour.



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The Good Idea employs all staff on standard employment contracts. The employment relationship is governed by the provisions of the sector's collective labour agreement, as well as by social security, tax and insurance legislation.

In particular:

- Employment is freely chosen, and there is no forced, bonded or prison labour.
- Freedom of association and the right to collective bargaining are respected.
- Working conditions are safe and hygienic.
- The wages and benefits provided to our workers are at least equal to national legal standards and industry benchmarks.
- All workers are provided with comprehensible written information about their working conditions and wages before they start work.
- No wage deductions are permitted as a disciplinary measure, nor are any deductions permitted that are not authorised by national legislation without the express authorisation of the relevant worker. All disciplinary measures must be recorded.
- Working hours comply with national laws and collective agreements.
- The Good Idea implements measures aimed at improving people's well-being, promoting work-life balance and providing support for mental health and wellbeing, such as flexible working arrangements and corporate welfare initiatives.
- Overtime is voluntary and is never used to replace regular working hours. In any case, it may not exceed 50 hours per week.
- No harsh or inhumane treatment is permitted. This includes physical abuse or punishment, threats of physical abuse, sexual or other forms of harassment, and verbal abuse or other forms of intimidation.

The company is committed to conducting its business in accordance with a culture of safety, and to promoting and consolidating this culture. From the moment of recruitment, employees shall comply with the Code and act with fairness, impartiality, integrity, and honesty. Acts and conduct that violate the law, or the guidelines set out in the Code are not permitted, even if they are in the company's interest.



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If an employee has any doubts about how to proceed, they must report the matter to the relevant manager, who will provide them with appropriate guidance. Employees must enhance their professional knowledge and contribute to accordance with their responsibilities, acting to protect the company's reputation and good name.

Employees must foster relationships that create a working environment characterised by fairness and collaboration. Everyone must act to maintain harmony, avoiding hostile and confrontational behaviour.

## Art. 4 – Freedom of Association

Freedom of association and the right to collective bargaining are respected:

- All workers have the right to join or form trade unions and bargain collectively, regardless of their background.
- The employer maintains an open attitude towards the activities of trade unions and their organisation.
- Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- Where the right to freedom of association and collective bargaining is restricted by law, the employer shall facilitate, rather than hinder, the development of alternative means of independent and free association and bargaining.

## Art. 5 – Safe and hygienic working conditions

Working conditions must be safe and hygienic.

- A safe and hygienic working environment must be provided, taking into account current industry knowledge and any specific hazards. Appropriate measures must be taken to prevent accidents and health hazards arising from, associated with, or occurring during work, by minimising the causes of hazards inherent in the working environment as far as is reasonably practicable.
- Workers must receive regular, documented health and safety training, repeated for new or reassigned workers.



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- Access to clean toilet facilities, drinking water and, where appropriate, suitable areas for food storage must be provided.
- Where provided, accommodation must be clean, safe and meet the basic needs of workers.
- The company should appoint a health and safety officer.

## Art. 6 – Child labour

Child labour must not be used.

..... The Good Idea operates in accordance with Italian law, which sets the minimum working age at 16, and complies with the relevant ILO standards. At The Good Idea, we do not employ anyone under the age of 18: all our employees have completed their secondary education.

Furthermore, we require our suppliers to guarantee that child labour is not practised in their operations, even where their country's legislative standards are lower than those of Italy, in accordance with the relevant ILO standards.

## Art. 7 – No discrimination

No discrimination takes place.

There is no discrimination in recruitment, pay, access to training, promotion, dismissal or retirement on the grounds of country of origin, nationality, religion, age, disability, gender, marital status, sexual orientation, trade union membership or political affiliation.

## Art. 8 – Diversity, Equity and Inclusion

The Good Idea recognises diversity as a strategic asset and a fundamental ethical value, and is committed to:

- regularly monitoring the composition of the workforce to identify and address imbalances, with a particular focus on gender pay equality;
- promote equal access to training, professional development and career progression;



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- ensure that work environments and tools are accessible to people with disabilities;
- set measurable DEI targets, which are communicated internally and reported in the annual Impact Report.

## Art. 9 – Environmental Policy

Our company is committed to managing its operations responsibly by measuring and progressively reducing its environmental impact, in line with the objectives of the Paris Agreement.

- Emissions and climate: the company measures its greenhouse gas emissions (Scope 1, 2 and, where applicable, Scope 3) annually and publishes the results in its Impact Report.
- Energy: the company promotes energy efficiency in its operations and the use of renewable energy sources.
- Waste and circularity: the company adopts circular economy principles in its materials management to minimise waste generation, prioritising reuse, recycling and recovery. Hazardous waste is managed in accordance with current legislation.
- Management system: the Good Idea is working towards adopting a structured environmental management system based on the ISO 14001 standard and has appointed an internal manager to coordinate environmental activities.

## Art. 10 – Integrity

No person covered by this Code may pursue private interests or seek personal gain. Anyone who offers or receives gifts or items of value from third parties, other than customary business courtesies, must report this immediately to their superiors.

Company communication systems, tools and materials, including internet connections, must be used exclusively for business purposes. Therefore, it is strictly forbidden to use company resources for personal purposes or to create or disseminate fraudulent, unlawful, racist, indecent or otherwise unprofessional material or data.



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## **Art. 11 – Conflict of Interest**

Recipients undertake to prevent conflicts of interest with the company by avoiding activities where personal gain may potentially conflict with the interests of The Good Idea. Employees and directors must refrain from pursuing economic or financial activities, whether personal or relating to their spouse or relatives up to the fourth degree of kinship, that conflict with or compete with those of the company or its partners. They must also avoid carrying out work for the company's clients or competitors.

## **Art. 12 – Anti-Corruption**

We conduct all our activities in an honest and ethical manner. We adopt a zero-tolerance approach to bribery and corruption, acting professionally and with integrity in all our relationships and business dealings.

The company has developed a specific Anti-Corruption and Conflict of Interest Policy setting out detailed actions and measures.

## **Art. 13 – Anti-Fraud**

The Good Idea has a zero-tolerance approach to any form of fraud. This is defined as any intentional act of deception, falsification, misappropriation or unlawful appropriation of resources, information or economic opportunities, which causes harm to the company, its stakeholders or third parties.

The following are prohibited, by way of example and without limitation:

- the falsification of accounting documents, contracts, purchase orders or expense claims;
- the misappropriation of resources, money or company assets;
- the manipulation of financial data or reports for personal gain or that of third parties;
- the abuse of position to obtain undue advantages to the detriment of the company or third parties;
- Collusion with suppliers, customers or competitors to obtain unlawful advantages is also prohibited.

Any suspicion of fraud must be reported immediately via the whistleblowing channels (Art. 19). Breaches of this policy may result in disciplinary action up to and including termination of employment, without prejudice against any civil or criminal liabilities under the law.



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## **Art. 14 – Confidentiality**

Employees must keep confidential any news and information concerning the company that they learn in the course of their work. Employees must not disclose any information regarding the organisation, production methods, financial data, business plans or any other aspect concerning the company's assets, the disclosure of which could be detrimental to The Good Idea.

Should third parties request information regarding the company, those to whom this Code has been issued shall be authorised to provide such information, provided they have received prior authorisation from the ..... relevant bodies.

## **Art. 15 – Relations with third parties**

The company's relations with any public or private counterpart must comply with the law and be guided by sound and prudent management principles. They must also adhere to this Code. Suppliers of goods and services are selected based on transparency, impartiality and cost-effectiveness. Their financial and professional competence is verified, as is their ability to carry out the tasks entrusted to them. Another selection criterion is the supplier's ability to help achieve the highest level of customer satisfaction in terms of quality, cost, and delivery times. Anyone who becomes aware, in the course of their work, that a supplier does not meet these requirements, or who knows of other suppliers capable of providing a better or more advantageous service, must inform the company so that a joint assessment can be carried out.

In their dealings with customers, all employees must adopt a code of conduct aimed at meeting their legitimate needs. They must provide accurate and detailed information on products with the utmost care and helpfulness, ensuring an informed choice that strengthens the relationship.

## **Art. 16 – Sustainable Procurement**

The Good Idea implements responsible and sustainable sourcing practices and requires suppliers to comply with the principles set out in this Code and in the Supplier Code of Conduct.



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The company incorporates environmental, social and governance (ESG) criteria into the selection, qualification and monitoring of its suppliers. Strategic suppliers are required to comply with the principles of this Code, particularly about labour, human rights and the environment. To this end, the company assesses its main suppliers using sustainability questionnaires or dedicated audits.

## **Art. 17 – Accounting transparency**

..... All those involved in administrative and accounting activities must ensure that every transaction is authorised and recorded properly, thereby guaranteeing its lawfulness, usefulness, and accuracy. Transparency and accuracy in accounting are essential values and standards. Accounting transparency is based on truthful, accurate, and complete documentation of every activity and related accounting transaction. Therefore, every transaction must be verified against the relevant documentation in order to complete the accounting entries, reconstruct the details, and identify the various levels of responsibility.

The use of company funds for unauthorized, unlawful, or improper purposes is strictly prohibited. All payments must be made based on authorized transactions.

## **Art. 18 – Sanctions**

The provisions of this Code form an integral part of the contractual obligations undertaken by The Good Idea's employees and directors. Any breach of the Code's provisions shall constitute a breach of contractual obligations, with all the legal consequences, including termination of the contract. This takes into account the repercussions that such a breach could have on the company's image, reputation and credibility. In the event of a breach of the Code by third parties acting in any capacity in The Good Idea's interests, employees must take all necessary measures to stop such conduct and terminate the relationship with the third party in question where appropriate.



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## Art. 19 – Reporting of Irregularities (Whistleblowing)

In accordance with Legislative Decree 24/2023, the company has established and maintains confidential channels for reporting unlawful conduct, breaches of this Code or applicable regulations of which a whistleblower has become aware in the course of their work.

Operational procedures for handling reports are governed by a specific company whistleblowing procedure, which defines channels, responsibilities, and management procedures. Reports may be made in writing, verbally or anonymously via the company channels communicated to staff.

..... The Good Idea guarantees:

- the confidentiality of the whistleblower's identity and the content of the report;
- protection against any form of retaliation or disadvantage;
- the report is handled in accordance with criteria of independence and impartiality;
- the retention of reports in compliance with data protection legislation.

This does not affect the possibility of reporting to the relevant authorities in cases provided for by law.

## Art. 20 – Entry into force and updates

This Code has been approved by the Board of Directors and will come into force on 15 June 2026. It replaces the precedent version in its entirety. The Code will be subject to periodic review in the event of regulatory changes or significant updates to the reference standards adopted by the company.

### Date

15/06/2026



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