



Code of Ethics

Villa Melitta Private Healthcare Facility

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1. Adoption and update

This Code of Ethics applies to the Villa Melitta Private Healthcare Facility (Villa Melitta). It became effective with the approval of the Board of Directors on 15/06/2014.

In the event of significant changes in the structure, management or activity of the Healthcare Facility, the Code must be reviewed in order to ensure its constant alignment with the development of the company and of the ethical principles expressed by the economic and social communities of reference.

2. Objectives, recipients and methods of application

Through the Code of Ethics, we pursue the alignment of the interests of Villa Melitta, in compliance with the fundamental principles, the citizens' rights and the objectives of Villa Melitta, governing relations with Stakeholders in a unified manner and consistently with its organisational system.

The relationships based on trust with all the Stakeholders represent a core value for Villa Melitta and they are based on the good reputation that the Healthcare Facility accumulates by observing the duties of loyalty towards them, as defined in this Code.

The compliance with ethical commitments and responsibilities, undertaken with regard to the Stakeholders when combining their individual interests within company strategies, in addition to actual healthcare services and to clinical and economic management results, is therefore the criterion by which we intend to qualify our behaviour. We intend to form and enhance the reputation of Villa Melitta primarily on the Code of Ethics and on its observance.

All those who work in any capacity for and on behalf of Villa Melitta - employees or collaborators - are required to know, observe and implement this Code without reservation and those who have the greatest responsibilities, such as the management, must set an example in the adoption of consistent behaviour.

3. Compliance with the Code and relation with other sources of law

The Code of Ethics defines how Villa Melitta intends to pursue its mission and deal with the different Stakeholders by carrying out its management and operational activities in compliance with the moral and legal obligations towards the community. Therefore, we consider compliance with the code as a value in itself.

At the same time, we expect our stakeholders to act in accordance with similar ethical principles and, in any case, consistent with the universally accepted principles on human rights, labour, safety and environment.

The regulations of this Code do not replace but are an addition to those adopted in relation to specific regulations in force, whether mandatory or corporate governance.

Their observance thus requires respect for the courts system and the constant commitment to operate in compliance with the current laws and public authority regulations, with the International Standards with which we complied or will comply in the future and with internal procedures.

The Code of Ethics is an essential part of the integrated system for managing Quality, Safety and Environment of Villa Melitta, in that it completes this model in terms of expression and communication of values, principles and rules of behaviour, and contributes to the implementation of universal principles.

To this end, the following points are an essential part of this document:

- The citizen's rights
- The integrated management system of Quality, Safety and Environment;
- The company's rules of behaviour

4. The Stakeholders of Villa Melitta

When carrying out its activities, Villa Melitta has relations with many stakeholders, i.e. groups and individuals holding specific interests, which are affected by the activities of Villa Melitta and/or contribute in different ways to the activity or existence of Villa Melitta.

For the purposes of applying this Code, the commitment of Villa Melitta refers to 5 Stakeholders:

- 1. The Partners**
- 2. The Patients**
- 3. The Caregivers**
- 4. The Visitors**
- 5. The Collaborators**
- 6. The Institutions**
- 7. The Suppliers**
- 8. The Competitors**
- 9. The Citizen**

The success of the organisation depends on the ability to understand and meet the requirements and expectations, present and future, of all the interested parties: partners – patients – collaborators – institutions – suppliers

The relations from which the expectations of our Stakeholders derive form the basis of the duties of loyalty that we have towards all Stakeholders. These duties of loyalty make sure that Villa Melitta pursues its mission by trying to fairly balance the interests of all the Stakeholders, taking also account of the existence of multiple interests, and thus of potential complementarities and conflicts of interest, and of being a Healthcare Facility working within the framework of the national health service, hence subject to obligations with regard to the Health Authority.

We share with all the Stakeholders the responsibility for considering the quality of the health service provided and the economic and environmental sustainability of our current activities, because it significantly affects the life conditions and possibilities of future generations, both in terms of health and of work and social growth and stability.

5. Ethical principles of reference of Villa Melitta

EQUITY

as a guarantee of equal opportunities, balance and impartiality towards all Stakeholders

Each Stakeholder, whether an individual or a group of people, is equally worthy of consideration and respect in that it is not only a means for carrying out the mission of Villa Melitta but it is a value in itself, to which every day activities are directed.

By virtue of this principle, we consider any behaviour likely to cause damage to the integrity and dignity of each person, or any discrimination based on arbitrary preference or exclusion criteria, or not related to the importance of the contribution that the relation with the stakeholder can offer or of the interest that it can represent for the implementation of the mission of Villa Melitta as not eligible.

Therefore, personal characteristics such as gender, sexual orientation, race, nationality or ethnic origin, political belief or religion, age, marital status, physical appearance or disability, family or nursing responsibilities, bonds of kinship or otherwise cannot be used as a preference or exclusion criteria.

Any preferential treatment aimed at stakeholders who are part of categories at risk of exclusion from the economic and social context as a result of social or personal disadvantaged conditions or who deserve special attention for their social role or are defined by the law as worthy of special protection does not constitute a violation of the principle of non-discrimination.

Villa Melitta undertakes to comply with the principle of EQUITY towards its stakeholders through the following actions:

- PARTNERS: ensure compliance with the articles of association of the company
- PATIENTS: ensure access to services, all needs and competence being equal
- CAREGIVER: ensure access to support to the patients being equal
- VISITORS: ensure access to Villa Melitta in accord with the rules of Villa Melitta, being equal
- PERSONNEL: ensure equal treatment and non discrimination in employment relationships
- SUPPLIER: ensure impartial access to suppliers
- INSTITUTIONS: ensure impartial treatment when collaborating with Institutions
- COMPETITORS: ensure impartial treatment in a constructive partnership
- CITIZEN: ensure the rights of citizen

TRANSPARENCY

as a guarantee that the decisions are dealt with in the most transparent way possible with all Stakeholders

We consider essential, in order to build a relationship of trust that encourages a mutually favourable cooperation, both the openness to dialogue with the Stakeholders and transparency in the decision-making processes, in the methods of provision and access to services as a guarantee of equality and impartiality in managing financial and human resources.

We also recognise the value of active participation in multi-Stakeholder dialogue initiatives in order to identify priorities for action and search for solutions in relation to economic, social and environmental problems affecting the territory in which Villa Melitta operates.

On the assumption of full compliance with law regulations, the collection and processing of personal data are always in compliance with fundamental rights and freedom as well as with the dignity of the persons concerned. In particular:

- all the personal data processing operations are based on principles of lawfulness, fairness, relevance and completeness, collecting only the data required for determined, explicit and lawful purposes and keeping it only for the time required to achieve the purposes for which it was collected;
- we guarantee all the persons concerned the privacy policy and the communication in an intelligible form of their personal data and of the purposes and methods of data processing, and we make sure that all communications are addressed to individuals who expressed an explicit consent;
- we adopt specific security measures to prevent losses, unauthorised processing and unlawful or improper use of personal data and/or unauthorised access to databanks and IT tools.

Villa Melitta undertakes to comply with the principle of TRANSPARENCY towards its stakeholders through the following actions:

- PARTNERS: ensure the publication of choices, strategies, activities and accounts
- PATIENT: ensure knowledge in decision-making processes, in the methods of provision and in the access to the services of the Healthcare Facility protecting the privacy and dignity of the patient
- CAREGIVER: ensure involving in caregive processes protecting the privacy and dignity of the patient
- VISITORS: ensure that the rules of access, security and correct habitation of visitors in Villa Melitta
- PERSONNEL: ensure that all the actions concerning personnel are known to all, protecting the privacy and confidentiality of each employee
- SUPPLIERS: ensure clear communication with each supplier
- INSTITUTIONS: ensure clear communication with the Institutions with which we collaborate
- COMPETITORS: ensure clear relationship with the partners

- CITIZEN: ensure the rights of citizen

ETHICAL CONDUCT

as a guarantee of action by always applying the principles of equality, mutual respect, fairness, protection and promotion of human rights with all the Stakeholders

The relations of hierarchy and authority within the Healthcare Facility are important for its proper operation and hence for the pursuit of the interests of all the Stakeholders. Therefore, we are responsible for exercising the authority lawfully, based on the freely recognised trust that the decisions are always taken in compliance with the law and in accordance with the ethical principles, avoiding any abuse with regard to any Stakeholder or to take advantage of someone's cooperation to favour or disadvantage unfairly someone else or gain unilaterally a personal advantage from one's hierarchical position.

Albeit considering the fact that Villa Melitta operates in a political and social context in which the protection and promotion of human rights are established principles, we must make sure that these rights are observed not only by us but also by our Stakeholders, and in particular:

- **the right to integrity and personal dignity**, avoiding any direct, indirect and unintentional involvement, in the violation of the fundamental rights to life, safety and individual freedom, especially with reference to the use of child labour (as defined by Agreement no. 138 of the International Labour Organisation) and forced or compulsory labour (as defined by Agreement no. 29 of the International Labour Organisation) and to any other form of exploitation of children, women and minorities;
- **the right to health, safety and sustainable economic development**, promoting regulatory compliance and the actual application of the agreements and international protocols of reference and taking into account the standards and recommendations coming from operators and active international rating agencies of health and, in general, of public accountability of organisations.
- **The citizen's right**, by applying the **Protocol on the health service**, proposed, at national level, by the Court for Patients' Rights that operates responsibly, with the means at its disposal and within the limits of its resources and of its institutional duties, to remove practices and behaviour that hinder the exercise of these rights, and to take those organisational, economic, behaviour and management decisions that, instead, allow it and facilitate it.

Villa Melitta undertakes to comply with the principle of ETHICAL CONDUCT towards its stakeholders through the scrupulous observance of its Code of Ethics.

PARTICIPATION

as sharing decisions and objectives with its Stakeholders

Villa Melitta guarantees the involvement of the citizens through different forms of participation, so that they have an active role within the healthcare organisation and share responsibly business choices

(participation of users in choices of healthcare policies; adherence of the operators to a multidisciplinary cooperation project; knowledge of the services offered and of the conditions and methods established for accessing their function; knowledge of the company as a whole and in its organisational structure; access and reception of the users through new IT applications to improve integration between healthcare services and the territory.

Moreover, Villa Melitta guarantees the principle of participation of the company's operators in order to create a working environment that allows everyone to be a protagonist of operational and organisational transformations. We believe that people carrying out their works generate greater value when mutual collaboration, sharing of personal goals and team spirit are implemented, conditions that, in order to be upheld, require mutual trust and operating procedures of the Healthcare Facilities and mutual recognition of the merits.

To this end, remuneration must be based on equity compared to the quality and quantity of the occupation and offer appropriate incentives in relation to the provided contributions and to the obtained results, in such a way that all collaborators continue to give their contribution also in view of their moral appreciation towards the organisation in which they operate.

Villa Melitta undertakes to comply with the principle of PARTICIPATION towards its stakeholders through the following actions:

- PARTNERS: ensure the sharing of objectives and decisions among partners
- PATIENT: ensure the involvement of the patient and of his/her family at all stages of care
- CAREGIVER: ensure involvement in the rules of care in accordance to the privacy of patients
- VISITORS: ensure that are informed about the rules of conduct in Villa Melitta in the respect of the procedures of health care and the working processes from all employees of Villa Melitta
- PERSONNEL: ensure the involvement of the employee in business choices
- SUPPLIERS: ensure a partnership relation with each supplier
- INSTITUTIONS: ensure a partnership relation with institutions
- COMPETITORS: ensure a partnership relation based in a reciprocal collaboration
- CITIZEN: ensure the rights of citizen

CONTINUOUS IMPROVEMENT

as a guarantee of pursuing Quality, Safety and Environmental Sustainability in the implementation of the healthcare service.

The creation of sustainable value in the long term assumes that all resources - intended as professional or working contribution or wealth of relations of persons, or as financial, technological, environmental or natural production factor - are employed according to their actual capacity to contribute to the achievement of the Mission, Vision and Goals of Villa Melitta.

The pursuit of a policy for quality, safety and environment means:

- ensuring that the services provided are in compliance with the requirements specified by the regulations of reference and with the regulatory provisions on health, safety and environmental sustainability;
- meeting the needs of the patient and of the other Stakeholders interested in the provision of the healthcare service;
- the reasonable and steady improvement of performance efficiency, workplace safety and environment in which the organisation operates.

In this sense, Villa Melitta undertakes to guarantee all the Stakeholders coming into contact with the organisation a safe and healthy environment, preventing injuries and diseases that may be caused by the working environment.

We believe we can achieve this goal through an Integrated System of Quality, Safety, Environment and Social Responsibility (Certified by a qualified third party) involving all business functions, actively managed and continuously updated, improved in the management and performance, also related to health, safety and environment, by motivated, responsible and professionally prepared persons who collaborate with each other in compliance with each function and with the values shared by the Healthcare Facility.

Recognising the interest of future generations in the possibility of a life that is not bound to fail due to scarcity of natural resources, environmental degradation and climate change caused by the irresponsible behaviour of current generations, we consider it a priority to proactively manage our environmental responsibilities, both towards the communities in which we operate and towards future generations, in the medium to long term.

Therefore, we commit ourselves to have a preventive approach with regard to environmental challenges, by implementing an environmental policy aimed at the gradual reduction of direct and indirect impacts of our activity and dissemination of greater sensitivity and commitment for environmental protection, with reference both to the local context (quality of soil, water and air of the territory where we live) and to global challenges (biodiversity and climate change).

Villa Melitta undertakes to comply with the principle of **CONTINUOUS IMPROVEMENT** towards its stakeholders through the following actions:

- **PARTNERS:** constant commitment to the company's sustainable development and growth and to the maintenance of Quality, Safety and Environment certificates
- **PATIENT:** ensure the transparency of information and the provision of services suitable to meet the needs and expectations of the patient and his/her family
- **CAREGIVER:** ensure the transparency of information and the provision of services suitable to meet the needs and expectations of caregivers.
- **VISITORS:** ensure the improvement of the areas for visitors in Villa Melitta

- PERSONNEL: ensure a safe and healthy working environment and opportunities for a constant professional development
- SUPPLIERS: ensure the choice of the best supplier on the basis of objective quality, safety and environmental sustainability requirements
- INSTITUTIONS: collaborate with institutions in line with our integrated system of quality, safety and environment.
- COMPETITORS: ensure a partnership relation based on reciprocal improvement
- CITIZEN: ensure the rights of citizen

INNOVATION

as the constant development of new knowledge and expertise

We believe in innovation that is not an end in itself but is intended both as a promotion of the constant development of new knowledge and expertise at the service of the patient's health, safety and sustainability of the working environment, and as a search for continuous improvement with regard to all the Stakeholders. Especially at Villa Melitta, those who face the challenges of modern medicine and want to offer the best possible care to the patient must invest part of their activity in research and development and in the forming of relations with high-level scientific partners for a constant exchange of experiences.

Villa Melitta undertakes to comply with the principle of INNOVATION towards its stakeholders through the following actions:

- PARTNERS: ensure added value
- PATIENT: ensure the best treatment and provision of the service
- CAREGIVER: ensure the best treatment and provision of the service
- VISITORS: to provide appropriate time and areas for the visitors of patients
- PERSONNEL: ensure a constant development of its expertise
- SUPPLIERS: ensure the choice of technological development
- INSTITUTIONS: ensure cooperation based on technological developments
- COMPETITORS: ensure a partnership relation based on development and innovation
- CITIZEN: ensure the rights of citizen

6. The fundamental rights of citizens

Villa Melitta protects the CITIZEN'S RIGHTS that are an essential part of the Code of Ethics. The fundamental rights of the citizen are explained below:

Right to time: the time of every citizen must be observed in the same way as that of bureaucracy and of healthcare professionals.

Right to information and healthcare documents: every citizen has the right to receive all the information and documents he/she requires, as well as to get hold of all the acts fully certifying his/her health condition.

Right to safety: anyone whose health is in a situation of risk has the right to obtain the health assistance required for his/her condition and has also the right not to suffer further damages caused by a possible malfunction of the facilities and services.

Right to protection: the healthcare service must protect in a special way every human being who, due to his/her state of health, is in a temporary or permanent condition of weakness, making sure that he/she is never deprived - for any reason - of the required assistance.

Right to certainty: every citizen has the right to obtain from the Healthcare Service the certainty of the treatment in time and space regardless of the provider and not to be a victim of the effects of professional and organisational conflicts, of sudden changes in regulations, of discretion in the interpretation of laws and circulars, of differences in treatment depending on the geographic location.

Right to trust: every citizen has the right to be treated as a trustworthy person and not as a possible dodger or a suspected liar.

Right to quality: every citizen has the right to find in healthcare services operators and facilities directed towards one goal: heal the patient and improve his/her state of health.

Right to difference: the specificity of everyone resulting from age, sex, nationality, health condition, culture and religion must be recognised and everyone has the right to receive accordingly a different treatment depending on the different needs.

Right to normality: every citizen has the right to follow treatment without changing his/her life habits more than required.

Right to family: each family assisting one of its members has the right to receive from the Healthcare Service the material support required.

Right to decide: the citizen has the right, on the basis of the information in his/her possession and without prejudice to the privileges of the doctors, to maintain his/her own sphere of decisions and responsibilities in relation to his/her health and life.

Right to voluntary service, to assistance by non-profit organisations and to participation: every citizen has the right to a healthcare service, whether it is provided by public entities or by private individuals, in which the presence of the voluntary service and of non-profit activities is favoured and the participation of users is guaranteed.

Right to future: every citizen, even if condemned by his/her illness, has the right to spend the last period of life preserving his/her dignity, suffering as little as possible and getting attention and assistance.

Right to redress wrongs: every citizen has the right, in the face of a suffered violation, to redress a wrong in a short time and adequately.

7. Failure to comply with the code of ethics

Reports of possible violations of this Code of Ethics must be submitted in writing and not anonymously to:

Management – Villa Melitta Srl Private Healthcare Facility

Via Col di Lana, 6 | I - 39100 BOLZANO

or to the e-mail address: info@villamelitta.it

The reports received will be kept strictly confidential, except as required by law.

The reports will be managed through the Non-compliance procedure and the opening of corrective/preventive actions and, in any case, with the stand taken by the Management of the Healthcare Service.

The reporting parties are guaranteed against any form of retaliation, discrimination or penalty, without prejudice to the right of the company to protect its reputation and that of its personnel and to compensate for any damage suffered as a result of reports made in bad faith.