

Code of  
Integrity and  
Charter  
of Values

Alitalia

# General principles

Who the Code is for and where it applies

Maintaining our moral integrity is a constant duty for all of us who work in Alitalia, and is a feature of the way the whole organization operates.

The articles of the Code apply without exception to everyone one of us, and to all those who work to achieve the corporate objectives.

Alitalia employees respect the principles of the Code when putting forward and carrying out projects, actions and investments which lead to increased corporate value, to higher returns for stakeholders, and contribute to the well-being of the colleagues and the community as a whole.

The Board of Directors sets the corporate objectives according to the principles of the Code.

All Company activities are carried out with commitment and professional rigor.

For all matters regarding observance of the Code, Alitalia employees

can contact either their department heads or the in-house offices appointed for this task.

**Alitalia's obligations** Alitalia guarantees the widest possible diffusion of the Code amongst all employees and its partners; specific in-house offices will be appointed for this task. Alitalia also undertakes to expand and update the Code whenever required, to conduct checks relating to every notification regarding violation of the Code's articles, to examine the facts and to take appropriate measures in cases of proven violation, including reprimands and compensation, as well as protecting anyone who provides such information from retaliation or penalties of any type.

**Obligations for all Alitalia employees** Each one of us, as Alitalia employees, knows the principles of the Code, and avoids behavior that is contrary to these principles; we contact our department heads, or the Code of

Integrity Committee, for guidance on how the principles should be applied, and to communicate quickly any information concerning possible violations, collaborating with the offices appointed to check them.

**Obligations for department heads** Department heads set an example for their co-workers through their behavior; they encourage them to respect the Code, communicating quickly any violations of the principles to their superiors or the Code of Integrity Committee, taking immediate corrective measures where necessary, and preventing any type of retaliation or penalty.

**Obligations towards third parties** All Alitalia employees take steps to inform third parties about commitments and obligations required by the Code and insist that third parties respect them.

# Mission and vision

We, as Alitalia employees, intend to make our Company the chosen airline for Italians and for all travelers who come to Italy as the destination for their journey;

moreover we intend to develop our natural geographic vocation to serve those who choose Italy as a transit point for other destinations.

Every day we aim to win over our customers' trust,

giving the experience of flying a uniquely Italian flavor, at the same time pursuing the quest for excellence in terms of safety, security and quality.

Through these actions, we intend to reconfirm Alitalia's role as an essential prime mover for Italy's social, economic and cultural growth, spreading our heritage of values and know-how all over the world.

We want to do this with a team of people who are willing to take on an ambitious challenge, people who are able to muster up courage, dedi-

cation and rigor, loyalty and determination, working with and for the country as a whole. We fully realize that total commitment is required from everyone, to enable us to achieve what we are working for: that is, creating value for our customers, our stakeholders and our colleagues.

# Commitment by Alitalia employees

**People** They are the Company's true capital. They are the driving force behind the Company's success and image through their energy and intelligence, and they are also a guarantee for its future.

We are committed to furthering and safeguarding the current and potential professional levels of each one of us according to our merits, in a climate of equal opportunities, so that the abilities and legitimate ambitions of individuals are considered an integral part of achieving corporate objectives.

We are likewise committed to ensuring the moral and physical integrity of our human resources, ensuring working and environmental conditions that respect individual dignity and are functional, safe and healthy, while ensuring that nobody is exposed to unsuitable conditions or unnecessary inconvenience.

Alitalia's activities are carried out

with full respect for current legislation regarding accident prevention and protection of workers in the workplace.

Finally we are committed to protecting personal information relating to individuals, and preventing any type of improper use.

## Safety and security in flight

We are committed to ensuring safety and security in flight by applying national and international regulations regarding the safety and security of commercial air transport (ground and flight activities together with maintenance, training and certification of personnel), where necessary including our own requirements and quality standards.

The management guarantees and promotes a policy of safety and security within the Company. Furthermore, we check that our standards conform to those used by other carriers and operators with whom we set up alliances and sign commercial and operative agreements, as part of our ground and flight operations.

**Air transport mobility** Alitalia transports people and cargo all over the world, and is aware of the influence its activities may have on the overall condition of others, on their economic and social development, and on the well-being of the community as a whole.

We are committed to meeting the needs of those who travel with us, and we make every effort to earn their trust so that they will choose to fly with us again, in preference to other airlines.

We guarantee reliable and safe services, always aiming for a top quality product. We want to stand out for our customer care; in practical terms, this means willingness, politeness, clear and complete information, correct behavior, professional approach, and warm human relations.

**Environment** We are committed to protecting the environment, as part of a policy of "sustainable development", and we make sure that the use of natural and industrial resources required to

achieve our business goals does not prejudice the quality of life for present or future generations.

Therefore, the subject of environmental compatibility is an integral part of strategic planning and production processes, and is applied to our day-to-day operations in a way that is clearly evident to customers.

Moreover, we take an active part (through appropriate bodies) in promoting scientific and technological development aimed at protecting the environment and safeguarding resources.

## Social and community life

We care about people who need assistance and support, and we help them when they have to travel by plane.

We share our understanding of cultural diversity with customers, respecting and protecting them.

In addition, we are committed to promoting social solidarity and to spreading the knowledge of Italian art and culture to the world.

**Creating value** Providing satisfaction for customers is a prerequisite for creating value. For this reason, we are committed to treating every link of the value chain with the utmost care and attention: managing financial resources with real and constant responsibility, setting up and maintaining smooth and efficient processes, increasing profitability and value over time, diversifying and expanding markets, handling risks conscientiously, while respecting the skills and professional pride, as well as the sense of belonging and motivation, which our colleagues and others feel.

**Business management** We base our business dealings on principles of loyalty, correctness, transparency, efficiency and openness. Corrupt practices are prohibited, as are illegal favors, deceitful behavior, seeking personal gain or career advancement directly and/or through third parties, for oneself or for others. In any case, we avoid all situations

and activities which might lead to conflict with the Company's interests or which might interfere with our ability to take impartial decisions in the best interests of the Company, while fully respecting the articles of the Code.

The obligation to abide by the principles of the Code is required of all external collaborators and is written into their contracts.

**Accounting transparency** In managing the Company's financial resources, we are committed to providing clear, accurate and complete information, respecting the law and the general regulations for drawing up balance sheets and any other type of compulsory administrative or accounting document, so that the decisions taken by investors and stakeholders are made with full awareness of the Company's strategic choices, business performance and the expected returns on invested capital. Every operation is backed up by appropriate documentation, kept on file, relating to that activity. Everyone is responsible for making

sure that the documentation is easily retrievable and arranged according to logical criteria.

**Legality** We act in complete and rigorous conformity with national and EU legislation, including the laws of other countries where we operate; we avoid, and foresee, any type of behavior or conduct that is directly or indirectly linked to committing a crime or any other illegal action.

**In-house controls** We are committed to making everyone aware of the importance of in-house controls. In-house controls are an essential means of guiding, managing and checking the Company's activities with the aim of ensuring respect for the law and corporate procedures, protecting the Company's assets, and managing efficiently the preparation and publication of accounting and financial figures that are accurate and complete. The responsibility for setting up an effective in-house control system is common to all levels of the organizational structure.

## How Alitalia staff behave

**Steadfast and loyal** We respect the rules established by laws, employment contracts and the Company; we take full responsibility for the decisions we make; we are careful in the way we manage human and financial resources and company property; we handle transactions with honesty. We are committed to building a relationship of trust and support with the Company, in a manner that is transparent and open. “No” to running the Company in a way that is superficial or dictated by personal interests involving situations, people and company assets. “No” to apparent assent or assent that is given with reserve, to hypocritical or devious behavior, to comments such as “that’s not my job”, to shirking responsibility. “Yes” to reaching goals on time, to relations with colleagues that are based on trust at every level, that are built on work skills, on the ability to

question oneself. “Yes” to a constant flow of communication that is fair and transparent, that concerns information at an operational level and at a level that represents the common good.

**Dedication** We are committed to directing our energies towards Company goals, and never personal ones.

“No” to defending work

performance at all costs, to private affairs, and bureaucratic handling of power.

“Yes” to behavior that is fully geared towards providing customer satisfaction, to preventing and dealing with criticism, to constant and tangible investment so as to ensure a positive relationship between the offices.

**Constancy** We persevere in our quest to achieve, and to maintain these objectives over time.

“No” to defeatist attitudes, and to making do with any result

“Yes” to constant commitment, which is solid but also flexible and dynamic - and has the ability to

cope with unforeseen problems, difficulties, different types of people and situations.

**Integration** We are aware that we are part of a team, whose success depends on being a close-knit group of people with a strong sense of team spirit

We contribute to maintaining an atmosphere of mutual respect and dignity within the Company.

We put our work experience at the disposal of others, and share it with others whenever we can, thus contributing to the growth of Company know-how.

“No” to pursuing selfish goals, to slanderous or offensive behavior, to using one’s knowledge for personal ends, instead of using it to help others.

“Yes” to involving colleagues, department heads and co-workers in pursuing common and shared goals, to listening properly to others in order to have a more varied and wider view of things.

We are aware that it is just as important to share our knowledge with others as it is to learn from others.

**Privacy** Personal data and confidential information regarding the Company is protected by strict privacy laws. This information includes: company strategy, sales tactics, policy and union matters, proceedings, research, reports, personal data, suppliers' contracts, software.

**“No”** to using, communicating, spreading news about information and data without specific authorization.

**“Yes”** to acquiring and handling information for Company purposes only, thus preventing improper and instrumental use on the part of unauthorized parties.

## External relations

**Suppliers** We behave in a way that is objective, transparent and respectful of Company procedures in terms of evaluating the price/quality ratio, along with economic convenience and how necessary the suppliers are for the Company. We do not abuse our contractual power by imposing conditions that are unfair or exceedingly onerous, and we safeguard equal opportunities for all suppliers. We establish a relationship with our suppliers ensuring that our customers' needs are met, in terms of quality, cost and timing, and in ways that respect the rights of people, workers, and the environment. Insofar as is possible, we use products and services supplied by subsidiaries at competitive prices, while respecting the laws.

**Public Administration** Through our established offices, relations with the Public Administration are geared towards safeguarding our

overall interests, while respecting mutual roles and functions, in a spirit of total collaboration, frankness and transparency. As part of these relations, we are committed to abstaining from actions that promote interests outside the Company.

## Political and

**union organizations** Through our established offices, we are committed to maintaining relations with political and union organizations, in order to promote fair debate and cooperation, while respecting legitimate interests, without any discrimination or difference in treatment, according to principles of transparency, privacy, autonomy and integrity. We do not make direct or indirect payments, under any guise, to parties, movements, political and union organizations and committees, their representatives and candidates, apart from those due according to specific rules.

**Media relations** We are committed to providing the media

with information that corresponds to Company policies and programs - it must be truthful, transparent, non-instrumental and completely unambiguous and consistent.

To this end, relations with the press and other types of mass media are exclusively the domain of the established office, which is the reference point for all Alitalia staff, so as to safeguard the privacy of Company affairs.

## Communicating with the outside world

Alitalia employees responsible for informing the outside world about Company goals, activities, results and points of view, do so by taking part in conferences, congresses and seminars, and by writing articles, reports and publications or making public announcements. For all these forms of communication, they obtain authorization from the head of the structure to which they belong, and are also required to agree on the contents with the External Relations office.

**Competitors** We avoid all types of unfair competition, complying with legislation on this subject, and we base our business and commercial dealings on principles of loyalty and correctness.

Moreover, we view competition as a stimulus to help us constantly improve the quality of service provided for customers, while safeguarding our own competitive stance.

**Safeguarding Company capital, creditors and the market** One of the main features which distinguishes the ethical behavior of Alitalia employees, helping to raise the Company's reputation for reliability, consists of respecting principles of conduct which ensure the integrity of Company capital, safeguarding creditors, investors and third parties who have dealings with the Company, through the smooth running of market performance and, more in general, the transparency and correctness of Company activi-

ties from the economic and financial points of view.

Therefore, Alitalia employees conduct themselves in a way that fosters these values, respecting laws and in-house procedures; such ethical behavior also helps to prevent criminal offences and misdemeanors.

# Applying the Code

To apply and carry out everything contained in the Code of Integrity, Alitalia will adopt an organizational model to facilitate achieving all the objectives contained in it. In particular, a Code of Integrity Committee will be set up, whose tasks are outlined below.

## The Code of Integrity

### Committee

The Code of Integrity Committee is entrusted with the following tasks: promoting awareness and understanding of the Code within the Company; drawing up and issuing guidelines and operational procedures, working with other appropriate structures in this task; setting criteria and procedures aimed at reducing the risk of Code violation; checking that the principles of the Code are implemented effectively, and examining notification of possible violations, carrying out appropriate checks and controls; presenting an annual report on how the Code has

been implemented within Alitalia and its subsidiaries.

The Committee also gives its opinion on proposals for updating the Code.

To carry out its tasks, the Committee has a technical secretariat and makes use of appropriate Company structures.

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