



COSTRUZIONI

---

## CODE OF ETHICS

Integrated with

- THE PRINCIPLES ADOPTED BY THE BUSINESS ASSOCIATIONS
  - THE PREVENTION AND FIGHT AGAINST CORRUPTION
- THE PRESCRIPTIONS OF THE *ITALIAN COMPETITION AUTHORITY* (A.G.C.M.)  
FOR THE PURPOSE OF THE LEGALITY RATING

Reference	Review	Date	Approved
Code of Ethics	0		





## Contents

Introduction .....	3
1. GENERAL PRINCIPLES OF THE CODE OF ETHICS .....	4
2. RECIPIENTS OF THE CODE OF ETHICS .....	6
3. MANAGEMENT OF THE BUSINESS ACTIVITIES .....	7
3.1 General guidelines.....	7
3.2 Conflict of interest.....	7
3.3 Protection of company resources.....	8
3.4 Transparency of accounting and internal controls .....	10
3.5 Principles relating to environment and safety .....	10
4. RELATIONSHIP WITH STAKEHOLDERS .....	11
4.1 Relationship with Shareholders and Bondholders.....	11
4.2 Relationship with clients .....	11
4.3 Relationship with HR.....	12
4.4 Relationship with suppliers.....	13
4.5 Relationship with partners .....	13
4.6 Relationship with competitors .....	14
4.7 Relationship with the Supervisory Body and control authorities .....	14



COSTRUZIONI

4.8	Relationship with Parties, Trade Unions Organizations and Associations .....	14
4.9	Relationship with the Public Administration .....	
5.	PREVENTION AND FIGHT AGAINST CORRUPTION .....	16
5.1	General Principles .....	16
5.2	Additional principles in compliance with the self-regulation codes adopted by the business associations .....	16
5.3	Reporting obligation to the Judicial Authority .....	18

5.4	Legal rating — the <i>Italian Competition Authority's</i> (A.G.C.M.) duties.....	18
6.	METHOD OF IMPLEMENTATION OF THE CODE OF ETHICS.....	19
6.1	Adoption, amendments, upgrading.....	19
6.2	Dissemination and communication.....	19
6.3	Violations.....	20



## INTRODUCTION

This Code of Ethics reports the ethical and moral principles which contribute to the formation of the *C.R. COSTRUZIONI SRL*'s corporate culture.

These principles represent the guidelines that all operators and top managers must follow in order to adopt the right behavior for operating and making decision within the company. Such principles are integrated with the Organizational, Management and Control Model adopted by the company pursuant to and by effect of the Legislative Decree 231/2001 (June, 8th).

The Code of Ethics represents a point of reference for all recipients, as subsequently indicated, and widely covers the role and the relationship that the company establishes with its own interlocutors.

## CHAPTER 1

### 1. GENERAL PRINCIPLES OF THE CODE OF ETHICS

This Code of Ethics highlights the set of principles, values and behaviors which constitute the basis of the company's activity, as well as the main rights, duties and rules of conduct in which it recognizes itself. The general inspiring ethical principles are: morality, equity, equality, health and safety, diligence, transparency, honesty, integrity and efficiency, confidentiality, impartiality, environmental protection and fair competition.

The Code must be made available to all recipients and the principles and behaviors contained in it must be accepted and adopted by all those who establish relationships with the company. The observance and adoption of this Code aims at guaranteeing the implementation of all corporate activities with the maximum result.

In this perspective, the company:

- assumes as fundamental commitment the compliance with the law and regulations in general;
- adheres to the general principles of honesty, transparency, good faith, fairness, integrity and confidentiality;
- undertakes to act with the utmost diligence, equity, loyalty, collaborative spirit, moral and professional strictness;
- promotes, in a context of social responsibility and environmental protection, the correct and functional use of resources for the execution of the work activities;
- guarantees fair and transparent management of commercial, economic and financial transactions;
- undertakes to abide by the principles of truth, transparency, accuracy, completeness and conformity with current regulations on accounting information and to adopt



efficient and effective internal control systems;

- undertakes to carry periodical checks for ensuring the adequate observance of the Code of Ethics and applies appropriate sanctions in case of verified violations;
- guarantees the maximum dissemination and understanding of the Code of Ethics, either within the internal organization and with third parties who establish and/or entertain business relationships with the company.

Furthermore, the business organization of the company, the current regulations and all the procedures in general are analyzed as a whole to verify their coherence and efficiency in order to prevent the commission of predicate offenses as provided by the 231 Organizational Model. To this aim, further improvements and/or implementations are carried out with the intention of ensuring constant development.

It will have to be continuously modified, revised and integrated in order to minimize the commission of offenses, it will have to be adapted to the changes regarding regulatory developments and social awareness, as well as to the indications provided by the Supervisory Body as required by the Legislative Decree n. 231/2001.

The company carefully monitors compliance with the Code and provides adequate information, prevention and control tools. To this effect, the company will ensure adequate training programs and accountability for any issue related to the Code of Ethics.

The recipients are indeed required to scrupulously observe the operating procedures regarding their own expertise as they rule all company activities, detect control elements and guarantee traceability and compliance with authorizations at different levels.

The acceptance and adoption of the Code of Ethics demands all recipients be accountable in the event of non-compliance and violation of company procedures or ethical principles. Such violations hinder the moral line pursued by the company, and undermines the co-established relationship of trust at its roots; hence, in order to prevent such behaviors, a disciplinary and sanctionary system is adopted, as a result of which those who will be responsible for non-compliance and violating the ethical principles will be sanctioned.





COSTRUZIONI

## CHAPTER 2

### RECIPIENTS OF THE CODE OF ETHICS

The recipients of the Code of Ethics are: shareholders, directors, managers, legal representatives, employees, consultants, all collaborators of the company (including investee companies, subsidiaries and associates) as well as all those who, directly or indirectly, permanently or temporarily, establish and entertain relationships with the company.

These parties are obliged to be aware and comply with the provisions contained therein and to adapt their behavior and their actions to the principles expressed.

## CHAPTER 3

### MANAGEMENT OF THE BUSINESS ACTIVITIES

#### 3.1 General guidelines

In the execution and management of the activities the company is inspired by ethical principles such as: loyalty, good faith, integrity, careful use of company assets and resources, fair management, integrity and transparency of information.

All necessary measures are implemented in order to avoid and prevent the commission of unlawful acts, facts and behaviors or offenses, with particular reference to those provided for in the Legislative Decree 231/20021.

For this purpose, bribery practices, claims and/or concessions of illegitimate favors, collusive behaviors, solicitations of benefits for oneself or for others are explicitly prohibited.

All operations and transactions must be accurately supported by the relative documentation in order to certify roles, responsibilities, characteristics and reasons of the operations themselves.

#### 3.2 Conflict of interest

Everyone has the duty to avoid circumstances that can create conflict of interest, therefore no-one can take personal advantage by making use of opportunities encountered through the course of his/her own activities. For example, it is not permitted that a collaborator takes personal advantage of business opportunities of the company or seeks an interest other than the corporate one; likewise, it is not permitted that a client, a supplier or a Public Administration representative may act contrary to the fiduciary obligations connected to their own role.

Among others, the behaviors that determine conflict of interest - by way of example and without limitation, are listed as follows:

- employees, collaborators or others who get involved in activities concerning the

### Electrical information and software applications

- position of suppliers, clients, competitors, investors, and in general all other parties that try to establish business connection with the company;
- use of information acquired during the execution of company activities for personal gain and/or in favour of third parties and in contrast with the corporate interest;
  - execution of work activities or assumption of any type of corporate offices - also indirectly with clients, suppliers, competitors and third parties in general, in contrast with the interest of the company;
  - taking on mediation or business intermediation on behalf of third parties about operations regarding the company;
  - manipulation of the functional role in order to pursue interests in contrast with the social ones.

In the event that the employee identifies a situation of conflict he/she must promptly provide information to his/her direct superior and to the Supervisory Body.

Furthermore, all operators are required to maintain confidentiality to "know-how", company documents and information they have become aware of during the performance of their assigned functions. Information ruled by contractual obligations, patents, innovations and new technological adoptions, as well as information that may cause business damage or produce an illegal enrichment of personnel, is secret and confidential. The breach of confidentiality seriously damages the fiduciary relationship with the company and determines sanctions and measures.

### 3.3 Protection of company resources

In order to preserve and protect the corporate intellectual assets, the company trains the employees to use correctly all the resources and information entrusted to them for guaranteeing the correct execution of the activities.

### Use of company assets



## **COSTRUZIONI**

Employees and all other recipients of the Code, who recur to the company assets for the right performance of their activities are responsible for guaranteeing their preservation.

Their use must be carried out with the utmost diligence through the adoption of responsible behavior.

In particular, the employees and all other recipients of the Code are required:

- to maintain responsible and respectful behavior of the operational procedures provided to regulate the use of company assets;
- to avoid using company assets for purposes contrary to the law, public policy or morality.

It is all operators' responsibility to avoid the use of company assets for private purposes. Everyone is in fact accountable for preserving the efficiency of the company assets and avoid their improper use. Hence, everyone has the obligation to provide the direct superiors with possible information on any harmful actions suffered.

Each operator must:

- scrupulously adopt the provisions of the privacy policy and all security measures for not compromising the functionality and protection of IT systems;
- avoid surfing the Internet or using social media with indecent and offensive content;
- avoid loading software onto the company systems which is loaned or unauthorized and never make unauthorized copies of programs under licence for personal, company or third parties use;
- use company software for business purposes only and in strict compliance with the security measures for the protection of IT systems and company data.

### **Internal information**

Electrical information and software applications

Internal documents and information must be managed in compliance with company procedures.

Employees and/or all recipients of the Code that become aware of confidential information must not use it for personal gain nor to obtain benefits from third parties associated or related to them.

**Contributions and sponsorship**

The company can adhere to sponsorship requests through the payment of contributions to non-profit and duly constituted associations as long as their activities do not cause conflict with the principles set out in this Code. Associations operating in the social, environmental, sports, artistic, cultural field or related to other similar type of activities can be sponsored.

**Confidential information**

Employees and/or all other recipients of the Code may come across with personal information which are protected by the privacy law. The confidentiality of such information is ensured by compliance with legislation on the protection of personal data (EU Regulation n. 679/2016).



COSTRUZIONI

### **3.4 Transparency of accounting and internal controls**

To manage and prevent financial and operational risks, each operation and transaction must be carried out by employees and/or all recipients of the Code in a way that will be verifiable, properly authorized and registered in strict compliance with the current company procedures. In order to achieve this goal the company pays particular attention to the importance of having an efficient and effective control system within the internal organization able to lead to a real improvement of the processes involved.

The main objective is to safeguard resources, guarantee compliance with current regulations in force on the matter and provide economic and financial spending plans as well as truthful, reliable and correct financial statements to protect the company against corporate risks.

### **3.5 Principles regarding environment and safety**

The company is sensitive to environmental issues so as to promote the dissemination and adoption of environmental policies. Hence, it promotes activities aiming at the continuous improvement of all those objectives regarding the environmental protection, management and pollution prevention.

Therefore, it is the company's goal:

- to manage energy and natural resources in a sustainable way by enhancing use and reducing waste;
- to conduct production activities taking into account the pollution prevent criteria and the reduction of environmental risks, with particular attention to the environmental aspects of the various stages of production;

Electrical information and software applications

- to reduce waste production with an increase in recovery activities in the place of disposal;
- to ensure strict compliance with environmental legislation and carefully follow its evolution by observing the relative prescriptions.



COSTRUZIONI

## 4. RELATIONSHIPS WITH STAKEHOLDERS

### CHAPTER 4

#### Relationships with Stakeholders

##### 4.1 Relationship with Shareholders and Bondholders

Management bodies undertake to provide detailed, truthful and timely information to stakeholder, in order to encourage their participation in strategic business decisions. It is the company's commitment to increase the value of its own business in the face of shareholders investments, by enhancing the management and improving the production standards. The company's business aims at protecting, consolidating and increasing corporate assets in order to protect the company itself, shareholders and creditors.

##### 4.2 Relationships with clients

Full customer satisfaction – with reference to the expected quality standards in full compliance with current and contractual obligations is part of the company's mission.

The company has set up “customer satisfaction” activities aimed at verifying the achievement of the improving quality standard targets.

The company evaluates the adequacy and feasibility of services and performances requested from the clients having as reference not only the authorization, the regulatory and technical conditions, but also the economic ones. This in order to evaluate the possible assumption of commitments within logical, productive and financial sustainability that is suitable for the company without compromising the quality and standards of the services offered, as well as safety at work or financial and economic balance.

In managing relationships with clients, the company guarantees clarity and integrity in commercial negotiations, and thereafter, once awarded the contract, it ensures an adequate supervisions of the activities to provide a faithful fulfillment of the commitment undertaken.



COSTRUZIONI



COSTRUZIONI

### 4.3 Relations with HR

#### General Principles

Human Resources cover a precious, necessary and indispensable role for the conduct of the business. Professionalism, abilities, fairness, loyalty and commitment are all essential conditions required by the company for managers, employees and all other collaborators to achieve corporate objectives.

It is the company's commitment to adopt careful behaviors which respect the cardinal principles of social responsibility and which are all oriented towards the respect of worker's rights.

They can be summarized as follows:

- do not use or support child labor;
- do not encourage or support "forced and compulsory labor";
- do guarantee a safe and healthy workplace;
- do respect workers' rights and join the trade unions organizations;
- do not engage in any kind of discrimination;
- do not use or support disciplinary practices such as corporal punishment, physical or mental coercion;
- do adjust the working hours to the national and local laws and agreements;
- do pay employees in compliance with the *Collective Labor Agreement (CLA)*



COSTRUZIONI

### **Recruiting**

The recruiting process is constrained by the correspondence between the candidates' profiles and the company's needs and expectations.

Adequate measures are adopted to ensure equal opportunities by avoiding any kind of favoritism, nepotism, discrimination and/or cronyism.

The staff is hired with a regular contract; irregular forms of contracts or instrumentalization of other forms of collaboration are not allowed. Each collaborator must receive clear information regarding:

- functions and duties;
- salaries and contributions as per *Collective Labour Agreement (CLA)*;
- procedures for the preventions of any health risks.

It will be necessary to check at the beginning of the employment contract that the collaborator has correctly understood this information.

### **Enhancement of Human Resources**

Company managers who rely on the contribution of several professionals must aim at enhancing their position by promoting growth and improvement.

It is the company's commitment to provide training and information tools in order to guarantee such professional development. The enhancement and development of employees takes place through a meritocratic and equal opportunity process.

### **Safety at work**

The company is shaped by a workplace safety culture which guarantees respect for personal dignity



## COSTRUZIONI

and healthy work conditions in which – under no circumstances cases of discrimination regarding gender, age, race, nationality, sexual orientation and religious beliefs could be even potentially permitted. Moreover, privacy policies are protected in accordance with current regulations.

### **4.4 Relationships with suppliers**

The identification of suppliers for the purchase of goods takes place in compliance with principles of transparency and equal terms regarding both price and quality. The potential supplier participates directly or indirectly in the production of services meant to be rendered to the clients, towards which the company is committed in compliance with the principles listed above; the potential supplier must therefore guarantee quality, technical organizational structures and adequate financial resources, in order to not incur or let others incur contractual breaches.

The company monitors congruity and quality of the services and goods required. The operator in charge must guarantee impartiality and confidentiality and must not accept salaries, assignments, benefits in cash or similar.

### **4.5 Relationship with partners**

The law in force and the Code of Ethics must always be respected wherever it is necessary or required to entertain relations with Companies or third parties as a result of a joint participation in public procurement procedures, or consorzia or other forms of aggregations, albeit temporarily, as well as in the event of executing extraordinary corporate strategic transactions (by way of example, sales or acquisitions of company branches, mergers or demergers, etc.).

Partners must be identified among examples of integrity, moral and professional competence; likewise relations with them must be based on



COSTRUZIONI

transparency, fairness and equity.

#### **4.6 Relationship with competitors**

The company supports the principle of the market economy, by committing to fair competitions and recognizing the same right to the other companies. It acknowledges competitions as a constant stimulus for improving quality and efficiency of the services offered to the clients.

Relations with partners are based on principles of loyalty, fairness in full compliance with the antitrust regulations and the principles of this Code of Ethics.

Any action or initiative aimed at altering ordinary market processes is prohibited.

#### **4.7 Relationship with the Supervisory Body and control authorities**

The company undertakes to observe the regulations dictated by the Supervisory Body and control authorities in compliance with current regulations.

At the time of managing relations with these entities, maximum collaboration and respect for the institutional roles as well as commitment to the execution of their prescriptions is provided.

#### **4.8 Relationship with parties, Trade Union Organizations and Associations**

Provided that any actions will be performed in compliance with current regulations and provisions explained in this Code - with particular attention to the legislation on impartiality and independence, individuals with legitimate powers can claim the authority to give contributions to political parties, committees, public organizations or political candidates. To this effect, it is their obligation to keep the relative documentation.



The company entertains with the trade unions types of relations which are compliant with the current legislation in an optical of respect, transparency and spirit of co-operation to further confirm the role that the Company itself has recongnized to the trade union relations.

Everyone has the right to choose which trade union organization to join and no form of discrimination or favoritism based on membership in trade union organizations, associations or political parties is allowed.

Any form of involvement in political activities must be done in a personal capacity, at his/her own expense and in accordance with the law.

#### **4.9 Relationship with the Public Administration**

Relations with Companies and Public Institutions are based on principles of fairness, transparency and co-operations. Any type of behaviour which can prejudice the principles expressed in this Code is rejected.

Undertaking commitments with Public Administration and Public Institution is a right reserved to a trained personnel by means of powers of attorney specifically conferred, except for special powers of attorney which might be eventually conferred to others within the internal organization. These bodies are required to operate in strict compliance and observance with laws, rules and regulations in force.

Any relationship with Institutional interlocutors within a community and territorial framework, either at national or International level, must be notified to the represenatives in charge, who will be undertaking their interests and positions transparently, rigorously and consistently with the principles expressed in this Code.



**COSTRUZIONI**

Regarding all relations with the Public Administration, the company cannot be represented by third parties consultants in the event that conflicts of interests may arise.

## CHAPTER 5

### PREVENTION AND FIGHT AGAINST CORRUPTION.

#### 5.1 General Principles

The following behaviors are prohibited:

- attempting to obtain confidential information from public officials for personal benefit;
- adopting behaviours which can unlawfully alter the level playing field among the competitors;
- attempting to influence unduly the decision-making-process of the contracting authority;
- planning agreements with other economic operators aimed at distorting competition.

Proximity to the risk of corruption, creation of conflict of interest, lack of transparency and in general all those behaviours that can promote active and passive corruption are prohibited.

#### 5.2 Further principles in compliance to the self-regulation codes adopted by the related business associations.

##### **Company management replacement**

**A.** The company will immediately replace its top managers in the case that any of them, in relation with the offenses listed below, is condemned with a criminal sentence even if not definitive:

Crime against the Public Administration and the administration of justice



COSTRUZIONI

Embezzlement against the State. (art. 316-bis penal code)

Undue receipt of funds to the detriment of the State (art. 316-ter penal code)

Concussion (art 317 penal code)

Corruption for the exercise of the function (art. 318 penal code)

Corruption to obtain an act contrary to official duties (art. 319 penal code)

Aggravating circumstances [applicable to own corruption referred to in the art. 319 of the penal code], (art. 319- bis- penal code)

Corruption in judicial acts (art. 319-ter- penal code)

Undue inducement to give or promise benefits (art. 319-quater- penal code)

Brabery of a person in charge of a public service (art. 320- penal code).

Penalty for the corrupter (art. 321- penal code)

Incitement to corruption (art. 322 - penal code)

Above-mentioned offenses with regard to EU entities and bodies (art. 322-bis - penal code)

Influence trafficking (art. 346-bis - penal code)

Disturbed freedom of enchantements (art. 353 - penal code)



COSTRUZIONI

Disturbed freedom of choice of the contractor's procedure (art. 353 bis- penalcode)

Crimes against the economic order, competition, ownership and possession.

Crimes against property:

Aggravated fraud for the achievement of public funds (art.640-bis- penal code)

Usury (art. 644 - penal code)

Handling stolen goods (art.648 - penal code)

Laundering (art. 648-bis penal code)

Use of money, goods and utilities of illicit origin (art. 648-ter penal code)

Self-laundering (art. 648-ter.1 penal code)

Bankruptcy crimes provided and punished by the Royal Decree 267/1942:

- Fraudulent Bankruptcy (artt. 216 e 223)

Participation or co-operation in crime, aiding and abetting criminal organizations, or with the aim of subverting the democratic order

Subversion of the democratic order

Criminal association (art. 416 p.c.)



COSTRUZIONI

A. Mafia-type association (art. 416 bis p.c.) or any crime committed making use of the conditions provided for by art. 416 bis of the penal code or rather with the aim of facilitating the business of the company whose subject is the owner, technical director, legal representative, or anybody else linked to the ownership or the administration of the company.

B. The company will immediately replace its top managers in the case that of one of them is the recipient of a final criminal conviction for offenses other than those indicated above involving the inability to contract with the Public Administration ex art. 32-quater- of the penal code.

A. The company will immediately replace its top managers in the case that of one of them is the recipient of the judgment of an anti-mafia prevention measure.

### 5.3 Reporting obligation to the Judicial Authority

The company undertakes to report immediately to the Judicial Authority and to their trade association that they have undergone:

- an extortion or other crime which directly or indirectly has limited the company's economic activity in favor of others (businesses and/or people somehow traceable with criminal associations);
- an attempted bribery.

### 5.4 Legality rating - *Italian Competition Authority's (A.G.C.M.) duties*

The company undertakes to comply with the following additional principles:

- to respect the contents of the legality protocol signed by the Ministry of Interior and *Confindustria* (General Confederation of Italian Industry), to respect the guidelines that constitute the protocol implementation and to respect all those contents signed by the Ministry of Interior and the League of Cooperatives, as well as, at local level, by the Prefecture and trade associations;



COSTRUZIONI

- to use payment traceability systems also for amounts lower than those ones set by the law; to adopt processes for guaranteeing forms of Corporate Social Responsibility, also through Certification SA 8000:2014 or similar;
- to integrate this Code of Ethics with the principles indicated in the self-regulation codes adopted by the main business associations;
- to integrate the current 231 Organizational Model with the principles of prevention and fight against corruption.

Also, according to the *Italian Competition Authority's* protocol, the company must be registered in one of the so-called "White Lists" of suppliers, service providers or work executors which have explicitly introduced particular anti-corruption measures or which are simply not blacklisted referred to in the Decree-Law of 18 April 2013, which recalls the activities indicated in the art. 1, paragraph 53, of the Legislation Decree No. 190 of 6 November 2012.

## CHAPTER 6

### METHODS OF IMPLEMENTATION OF THE CODE OF ETHICS

#### 6.1 ADOPTION, AMENDMENTS, UPGRADING

The Code is brought to the attention of all interested parties both internal and external through specific ways of communication.

The Code is published on the official website.

Explicit reference to the Code of Ethics published on the official website will be made to all third parties who enter into contractual relationships with the company. All recipients are required to understand, observe and respect the principles expressed in the Code – whatever reason they operate for in favour of the company.

Instructions will be given through the dissemination of the Code on the official website or through refresher training courses to all internal recipients of the company.

The publication of the Code on the company website will be brought to the attention of third parties in order to demand compliance with the principles.

#### 6.2 Dissemination and communication

##### Training information activities

The company is committed to disseminating and promoting the ethical principles and all the obliged issues related to the ethical features in the context of business activity, with reference to the prevention of crimes which may give rise to administrative liability ex Legislative Decree n.231/2001.



COSTRUZIONI

For this purpose the company pays particular attention to the professional development of its employees and co-workers, all with a view of understanding the Legislation referred to in the Decree.

Training activities will differ for contents and delivery methods according to the qualification of the recipients, taking into account the level of risks of the area in which they operate and considering powers and duties conferred to them.



COSTRUZIONI

### 6.3 Violations

The violation of the rules and non-observance of the principles set out in this Code affects the relationship of trust established with the company; for all employees, the observance of these principles is part of their contractual obligations. Likewise, for what concerning relationships with third parties, it is explicitly prescribed in the contract the observance and respect of the Code.

All operators, internal and external, are required to report in non-anonymous form any non-compliance with the Code of Ethics. The reports are sent to the Supervisory Body who separately convenes the author of the report and the person responsible for the violation. The authors of the report are protected by the Supervisory Body who keeps their identity reserved.

The only exception to the obligation of confidentiality concerns the following cases:

- when a consent by the reporting party is expressed;
- in the case of liability for slander and defamation pursuant to the provisions of the penal code or to the article No. 2043 of the civil code;
- whenever anonymity cannot be affixed by law (e.g. criminal or tax investigations, inspections of supervisory bodies, etc..).

All those who are consequently involved in the handling reports are required to protect the confidentiality of such information.

The violation of the provisions set up in the Code of Ethics is sanctioned with immediate disciplinary measures depending on the severity of the sanction, regardless of any criminal judgement if the behaviour assumed constitutes a crime.