



THE AMAPOLA CODE OF ETHICS

An important preamble

We have always had reservations about the codes of ethics we've encountered over the years. Why would an organisation ever say they don't adopt the principles of legality, fairness, honesty and integrity? Or declare that data confidentiality is not something that matters to them, that they neglect dignity and have no time for diversity? In short, is it really necessary to state the obvious?

But then we started wondering: are we being sanctimonious, are we drifting dangerously between arrogance and sloppy thinking? And that's the point. We cannot take anything for granted, especially where we ourselves are concerned.

So in drafting this code of ethics, we want to take a pause for reflection, an opportunity to establish who we are and make any necessary adjustments, with a project involving everyone in Amapola and our closest stakeholders. Equally important, setting out our code of ethics now, after we have become a benefit corporation, places that decision within a wider context that more clearly defines our identity.

Seen in this light, the code of ethics becomes a tangible and, we hope, useful tool.

ABOUT US

Making sustainability a lived experience

Let's start at the beginning. Amapola is a communication and public relations agency that specialises in economic, environmental and social sustainability strategies and projects. We decided on this positioning when the company was founded, in 2009, as a consultancy and communication partner for organisations that view sustainability as a strategic value. Since 2021, we have also been a *società benefit*, a benefit corporation, embarking on a journey that has involved everyone in the agency in the definition of our common benefit aims and work on our benefit projects. Responsibility for pursuing our common benefit is assigned to the impact board, whose members, as stated in our articles of association, must be under the age of 36, a "political" decision in some ways: we have put our trust in the younger generations and their undoubted ability to lead us to a more sustainable form of development.

As our journey shows, the ethical dimension of Amapola's business is a fundamental question. Inside the agency, it involves each single individual, externally, it involves our clients, our suppliers, the institutions, the media, the environment, the territory and the community.

Rather than talking about a mission and a vision (which is what this is about, of course: surviving, hopefully enjoying the journey and generating impacts that are more positive than negative), we prefer to talk about what we do and how we do it. Our ultimate goal could be summed up as "**making sustainability a lived experience**". It is true that sustainability has to be achieved, but we think it also has to be shared, discussed, nourished, and brought to life with passion, constancy and intensity. This belief is the basis of all our consultancy work, of every strategy and project we develop, for ourselves and for everyone else.

To make this possible, the interpretation of "communication" we identify with is the original meaning of "the sharing of ideas in common": ideas, messages, information but, above all, values, in order to shape discussions, comparisons, knowledge and culture.

THREE VALUES THAT EMBODY OUR APPROACH

Three values represent, inspire and guide us. Once again, nothing has been imposed from above; our values are the result of a general discussion among everyone in the agency.

EXCELLENCE

→ *We pursue excellence with passion, competence and enthusiasm*

CARE

→ *Caring for people, for relationships, for details. Attention and thoughtfulness underpin our work*

SHARING

→ *We generate value by sharing ideas, knowhow, concepts and objectives*

All the standards of conduct and principles set out in this code of ethics reference the values that inform our activities and distinguish our agency.

THE CODE OF ETHICS

This code of ethics has been drawn up by Amapola and shared with the entire team. It establishes the ethical standards and the rules of conduct we follow, both as a business and as individuals, in our day-to-day activities and in our relationships.

Application and circulation of the code of ethics

Compliance with the code of ethics is the responsibility and duty of everyone in Amapola – partners, employees, co-workers – regardless of role, seniority, location, type of contract. The code sets out the rules of conduct followed by the whole team and is circulated internally as an email attachment, storage in the agency repository, publication on the www.amapola.it website and constant internal communication intended to stimulate debate on the question. The code is a dynamic document where every suggested improvement and amendment is considered by the management board and the impact board. A copy of the code is given to every new employee, intern and apprentice, and to suppliers when a business relationship is formed. For all other external stakeholders, the code of ethics is available on the agency website. It is also shared directly with all new clients, when their contract is formalised and registered.

The basics – otherwise known as “the bare minimum”

In relations with all our stakeholders (and competitors), Amapola and everyone in the agency operates in accordance with the principles of fairness, integrity, honesty, legality, confidentiality. A necessary minimum foundation in a civil society, to which we add a constant commitment to transparency, to respecting diversity, to promoting inclusion, to taking a responsible approach to our impact on the environment, people and the community, to sharing experiences, knowledge and ideas, to acting with courtesy in all relationships, to fostering the sustainability culture, to keeping up to date with best practices in ethics and conduct in the communication sector.

Our activities reference a number of important national and international documents:

- The United Nations Universal Declaration of Human Rights and the European Convention on Human Rights.
- The Italian Constitution.
- The UN 2030 Agenda 2030 and the 17 Sustainable Development Goals.
- Industry codes of ethics and conduct: the International Code of Ethics (Code of Athens) adopted by the CERP-Confédération Européenne des Relations Publiques and the IPRA-International Public Relations Association, and subsequent developments; the Global Alliance code of ethics, the code of conduct of the IAP-Istituto dell'Autodisciplina Pubblicitaria.

Like Global Alliance and FERPI (Federazione Relazioni Pubbliche Italiana), we support the introduction of an 18th SDG, on responsible communication.

In depth

With regard to our people

For Amapola, the core asset of a company are its people, with all their diversity, experience, traits, stories. We believe working with others is a driver for growth and important personal and professional enrichment: by embracing diversity, listening and sharing, we become better people, but also better professionals.

- In our agency, we are committed to upholding the principles of inclusion and safeguarding diversity, in gender, age, culture, sexual orientation, gender identity and expression, religious beliefs, ethnicity, nationality, health, disabilities. We combat any type of discrimination in our organisation. The agency and all its people are also committed “ambassadors” for diversity and inclusion in the wider community: this includes the use and promotion of inclusive, non-discriminatory language in our professional interactions.
- We are committed to building a positive, collaborative, respectful workplace where ideas and experiences are shared, and full empowerment is fostered. This includes training opportunities, plenary discussions on key issues (agency performance, benefit goals, team-building), regular team happiness surveys, annual individual interviews to discuss work issues, requests and professional opportunities.
- Courtesy is a fundamental requirement, not just in relations with clients but also in all relations among amapolers.
- We respect everyone’s right to disconnect.

- We pay great attention to the work-life balance. Flexibility and smart working are a real competitive advantage for us. Working from home is agreed with the line manager and posted on the agency calendar.
- We place great importance on our communication. Each one of us communicates in the name of Amapola and is expected to pay due attention to this. Every member of the team communicates our projects to the outside world (through press office activities, media relations, social activities, advertising and so on) in a transparent, measured way, highlighting the results achieved but also linking them to the work still to be done.
- Everyone in the agency undertakes to be environment-friendly: this includes using water and energy sensibly, differentiating trash, avoiding waste (printing only when necessary, for example).
- No amapoler may accept work-related gifts for any reason.
- Everyone in Amapola undertakes to use the agency's equipment and fittings with care.

With regard to our clients

Building client relationships based on trust, loyalty and dialogue is a priority for us.

- Our commitment to our clients starts with the quality of our work: the pursuit of excellence is one of the values with which Amapola closely identifies. This means offering not only our skills, experience, analytical research and updating capabilities, but also the ability to listen and understand, and intellectual honesty, proposing strategies and measures we believe will be truly useful for the client.
- Client relations are based on integrity, probity, confidentiality and, something to which we attach particular importance, transparency: from the formulation of our quotes to project management, from administration to meeting deadlines, we communicate with clients in a clear, comprehensible and precise manner. We also undertake never to overlook critical issues and possible image and reputational risks, and to compare our assessments with those of the client. At the same time, we avoid drawing foregone conclusions before discussing the merits of a question with our interlocutors.
- We undertake to promote a sustainability and social responsibility culture among our clients.
- We pay great attention to analysing our clients' local business identity (including those with multiple locations who operate on an international scale) and their relations with local communities.
- Our consultancy work is highly personalised and so is necessarily based on listening to and truly understanding the client.
- Amapola requests a fair remuneration for its work, commensurate with the quality and quantity of the services it provides, for which it details the resources involved.
- Our consultancy work is performed diligently and in accordance with the agreed deadlines.

With regard to suppliers

As stated in our articles of association as a Benefit Corporation, we want to be the best client for our suppliers.

- Relations with suppliers are based on fairness, honesty and integrity. This includes equitable, previously agreed remuneration, on-time delivery, clear briefs and contracts.
- We select our suppliers on a quality and cost basis, but also with regard to their stance on the environment, social issues and human rights.
- We assess the quotes we receive from suppliers in a fair and transparent manner.
- Our supplier relations prioritise engagement: every year we organise a survey to map satisfaction with the agency, and, depending on the results, make any necessary adjustments.
- Collaboration with suppliers is based on continuity and the development of synergies and partnerships, when deemed appropriate by both parties.
- We are attentive to the local size of our suppliers.

With regard to the trade and professional associations we belong to

Amapola and some members of the agency belong to industry and trade associations (mainly in the areas of sustainability and communication). We are committed to open and constructive collaboration with the various networks on joint projects and partnership initiatives and to sharing know-how and experience. Furthermore, every relationship, either personal or in the name of Amapola, is based on transparency, probity and integrity, to avoid conflicts of interest or inappropriate behaviour.

With regard to Benefit Corporations and B-Corps

Amapola is committed to developing synergies and promoting collaboration with Benefit Corporations and B-Corps in order to boost the positive impact of working together. Specifically, we see the Benefit Corporation as the entrepreneurial reference model for a sustainable economy. We take an active part in promoting the benefit approach through membership of associations and participation in educational events

With regard to the media

In our line of work, we have a lot to do with the media – online and offline – and with journalists. Every relationship is based on professional respect for our respective roles, collaboration, transparency, fairness, trust and, above all, credibility. This involves a commitment not only to not divulging false information, but also to not circulating information that is incomplete, deceptive, misleading, out of context or in any way manipulative. In the services we provide for our clients, we always recognise the complete freedom of the media to publish or not publish a release, in whole or in part. We also undertake to adapt our style and language to the specific medium.

With regard to the institutions

Our relations with the institutions are guided by the rules of behaviour set out in this code of ethics. At the institutional level too, our focus is on collaboration, promotion of culture, synergy, probity, transparency, compliance with regulations.

With regard to competitors

Relations with our competitors are informed by honesty and absolute respect for the professionalism of others. We comply with Italian and European regulations governing free competition. We reject unlawful and improper practices.

With regard to the community, the environment and new generations

Becoming a Benefit Corporation was a deliberate choice. It has helped us establish a concrete commitment to people, communities, the environment and the new generations.

- We work to ensure that, as far as possible, our impact on people and the planet is positive. This means analysing and measuring that impact, then adapting our activities accordingly. We do this every year with our Impact Report.
- Communication is our business: we put our expertise at the service of the sustainability culture, promoting it at local and national level through pro-bono training and participation in educational events.
- We work on practical projects to support the communities where our offices are located, ranging from pro-bono consultancy for micro-entrepreneurialism to support for voluntary associations through corporate volunteering schemes and lectures on sustainability in local schools.
- The new generations are particularly important to us. Our impact is managed by a board of under-36-olds (as stated in our articles of association), and we take active steps to facilitate the entry of young people into the workplace with projects where we make our know-how available. Even if our environmental impact is low, we keep it under control and are always looking for new ways to minimise it and be responsible: using green forms of transport and avoiding unnecessary travel, digitalising documents as much as possible, differentiating waste and keeping waste volumes down.
- Through our channels, we provide a constant voice for important social issues – life in prison, homelessness, people living in war zones or under dictatorships – that cannot be ignored or put to one side after a brief spell in the spotlight.

Compliance with and breaches of the code of ethics

Everyone at Amapola is required to comply with this code of ethics. The Amapola management board and the line managers are responsible for ensuring compliance, verifying reported breaches and intervening if breaches are found.

All our people may report any breach of the code of ethics to their line manager or to one or more members of the management board. The report is made in writing. Should a breach be reported and ascertained, the procedure provides for an initial verbal or written warning (depending on the seriousness of the breach), which may be followed by a formal reprimand in the case of a repeated breach.

Publication and validity

This first edition of the Amapola code of ethics came into effect in May 2023. It will be updated whenever necessary and reviewed in any case every two years. Any change or addition must be approved first by the management board in a joint session with the impact board and subsequently, as a final formality, by the board of directors.