



**INTEGRATED SERVICES TO
BUSINESSES**

Knowledge

Organization

Dynamism

Excellence

INTEGRATED SERVICES FOR BUSINESSES



LEGISLATION COMPLIANCE

We offer support to companies to conform their own process to regulate standards, mandatory and voluntary



BUSINESS DEVELOPMENT

We provide consulting and training for the growth of company competitiveness

ABOUT CO.DE

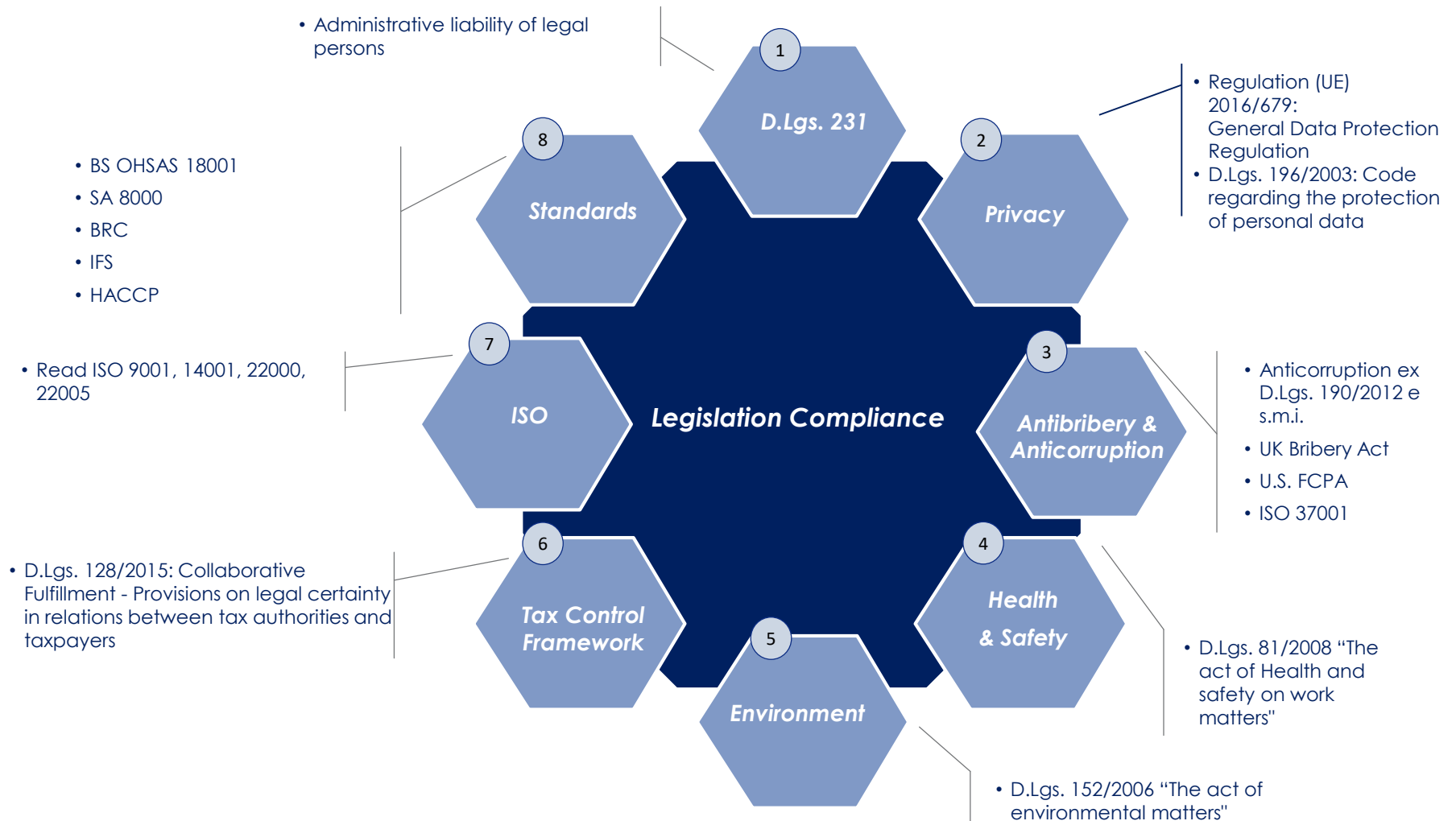
We are a consulting company founded with a new vision, to unite professionals of consulting and business management with one goal:

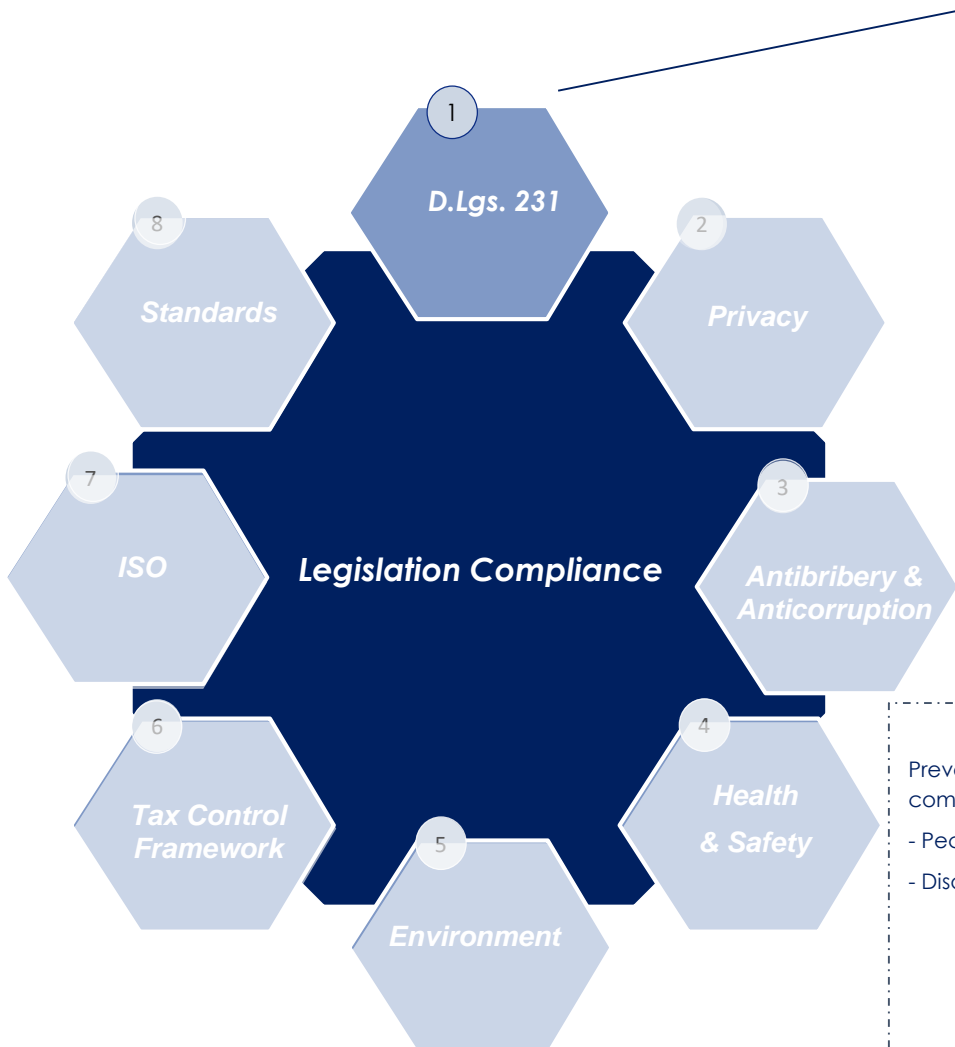
To support companies in the Compliance legislation and in the development of own Business through:

KNOWLEDGE, ORGANIZATION, DYNAMISM, EXCELLENCE

We are certified ISO 9001:2015 for the activity of «Planning consulting and training to companies and public entities in the legislation compliance and business management system ex D.lgs. 231/2001, Anticorruption, Privacy, Quality, Security and environment»

Below is a brief summary of the main areas, relating to the Legislation Compliance, of which CO.DE can provide support to companies that show interest in the implementation of Compliance System finalized to the legality of the business.





- We support our clients in preparing the necessary tools to prevent their responsibility in the event of crimes committed in their interest or advantage by their managers, directors or employees.

THE 231 OFFENSES

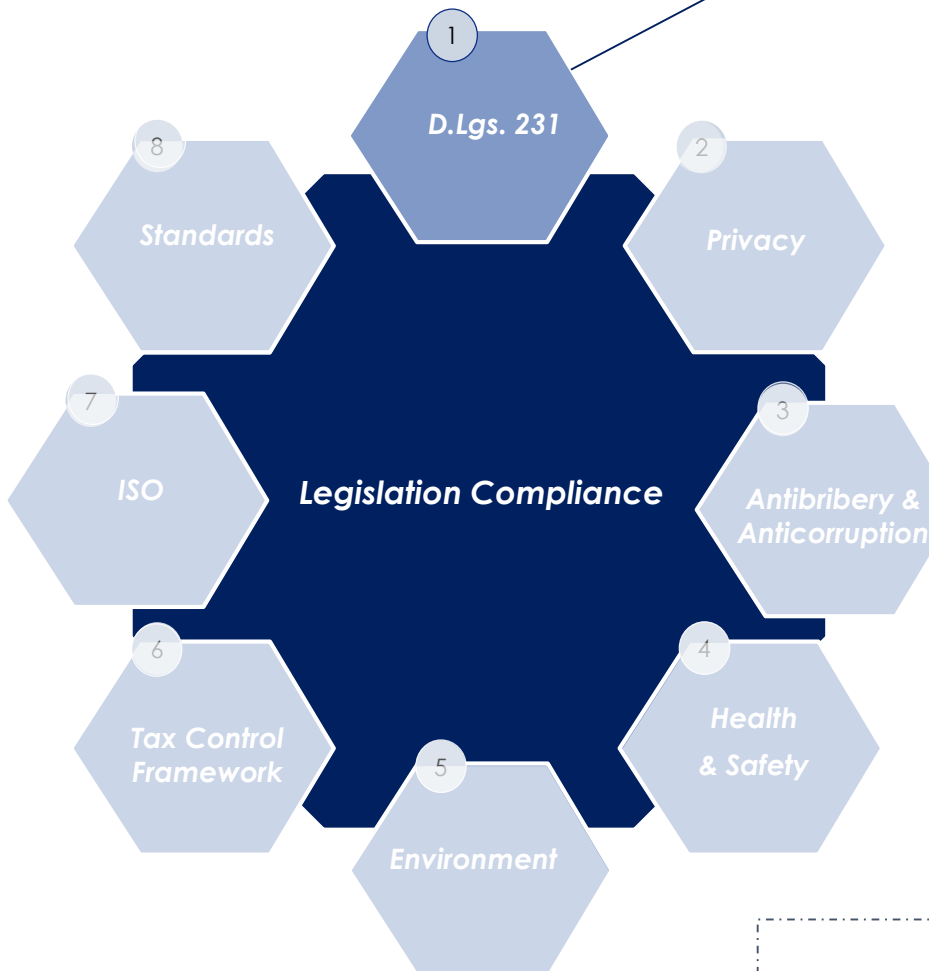
Among the offenses for which the company may be called to answer, as autonomous subjects with respect to the individual, pursuant to the Decree 231 there are::

- offenses against the Public Administration (eg. bribery and concussion);
- crimes of fraud against the State or another public body;
- computer crimes;
- crimes of organized crime;
- corporate crimes (eg. False corporate communications, bribery between private individuals);
- crimes of receiving stolen goods and money laundering;
- offenses relating to occupational safety;
- environmental crimes;
- food counterfeits.

THE PENALTIES

Preventing responsibilities means above all avoiding very serious consequences for companies such as:

- Pecuniary sanctions from a minimum of € 25.800 up to a maximum of € 1.549.000
- Disqualification measures such as
 - disqualification from the exercise of the activity, suspension or revocation of authorizations, licenses or concessions functional to the commission of the offense;
 - prohibition of contracting with the public administration;
 - exclusion from facilitations, loans, grants or subsidies and possible revocation of those granted;
 - prohibition of advertising goods or services.



THE SOLUTION

The Decree provides, in Articles. 6 and 7, a way out to avoid the onset of responsibility. The company, in fact, is not liable for the offense if:

- a) Implemented Organization, Management and Control Models (Organizational Models) able to prevent the offenses of the same kind as that occurred.
- b) It has entrusted a Supervisory Body (ODV) with the task of supervising its observance.

To be eligible, the Models must:

- i. **identify, through a risk-assessment activity**, the company activities exposed to the risk of crime (eg. participation in public tenders for corruption offenses, production and / or treatment of waste for environmental crimes);
- ii. **provide specific decision-making protocols** suitable for avoiding the commission of offenses in carrying out company activities;
- iii. **establish a disciplinary system** that provides for sanctions in case of non-compliance with the Model.
- iv. **Appoint a Supervisory Body** in charge of overseeing the Model

THE ADVANTAGES

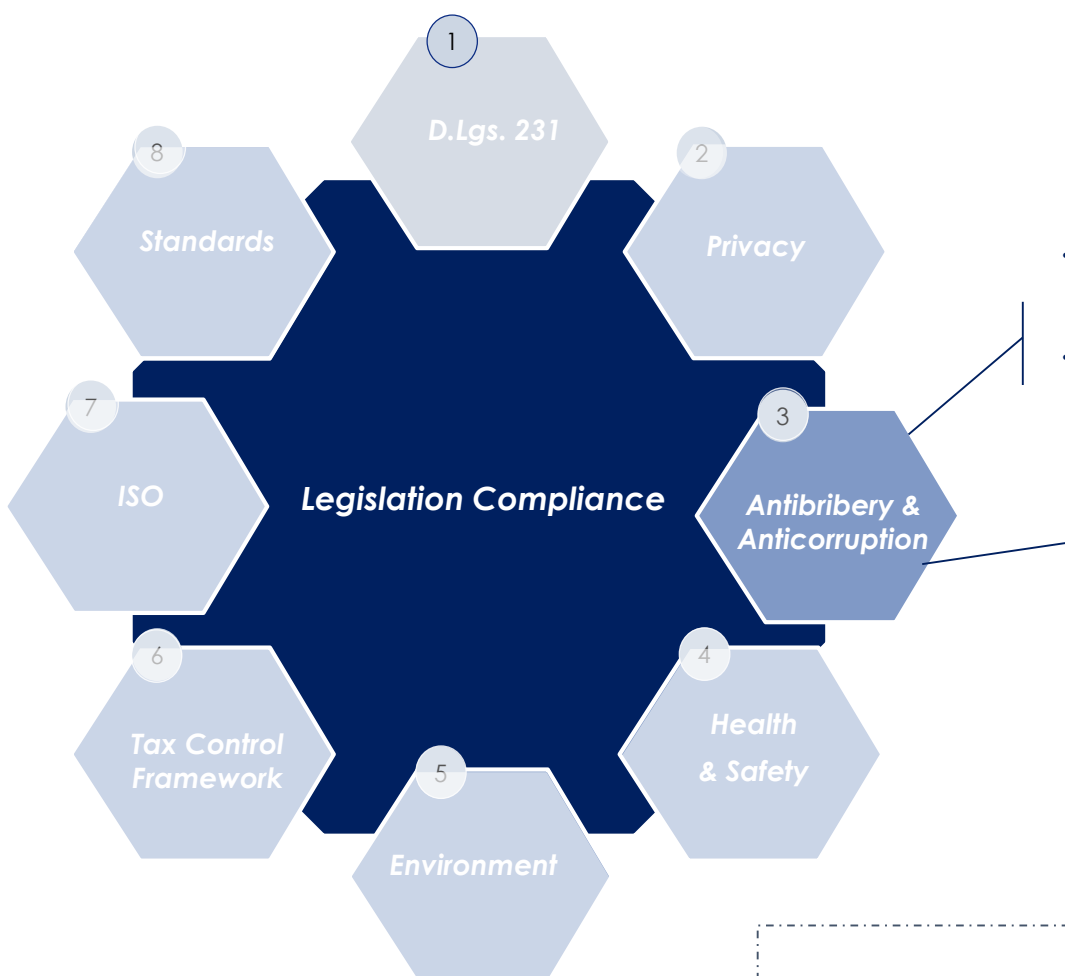
Adopting a 231 Model could prove vital to the Company.

In fact, the advantages deriving from the adoption of the Organizational Model are numerous:

- a) avoid serious penalties in the event of a crime;
- b) save up to 28% the INAIL premium (OT/24);
- c) obtain recognition of the legality rating by the Italian Competition Authority;
- d) obtain a high business rating from the ANAC for public procurement purposes;
- e) increase competitive capabilities and business opportunities related to greater reliability offered to its customers and partners.

WHAT IS CO. DE

CO.DE offers companies a methodology that complies with national standards (Guidelines for Trade Associations) and international standards (ISO 31000 on Risk Management) and in line with the new standards for anti-corruption (ISO 37001).



THE ORIGINS

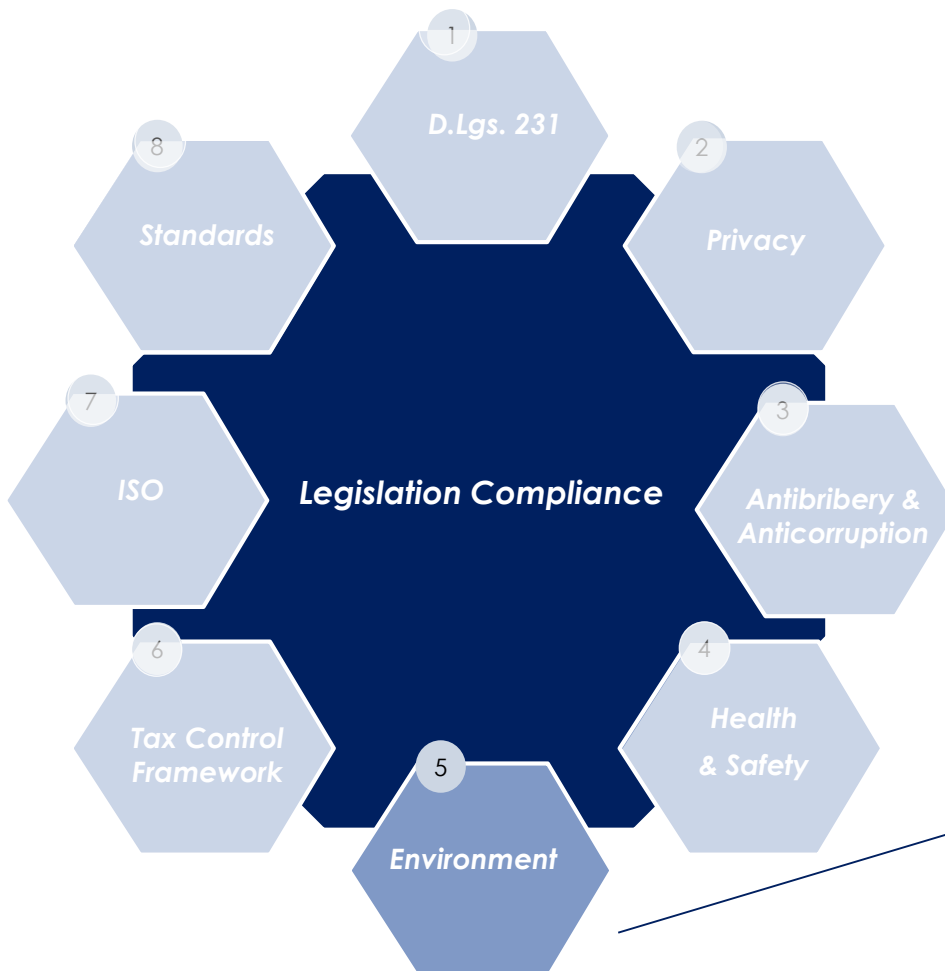
- The anticorruption arrived in Italy with the L. n. 190/2012 (Law Severino called also anti-bribery law). With it the legislature intended to strengthen the prevention and combating of corruption and forms of illegality in the P.A.;
- the anti-corruption law has introduced an organic system of prevention of corruption, whose characterizing aspect consists in the articulation of the process for the formulation and implementation of the strategies of prevention of corruption

FULFILLMENTS

- a) **appoint a person responsible for preventing bribery** and transparency;
- b) adopt a **Triennial Plan for the Prevention of Bribery** which, in view of an assessment of the corruptive risks, prepares **general and specific anti-bribery measures** for this purpose;
- c) Adopt a **Transparency Section containing the measures to fulfill the obligations to publicize the acts pursuant to Legislative Decree no. 33/2013.**

WHAT IS CO. DE

CO.DE offers public administrations, companies and economic public institutions a methodology conforming to national standards (National Anti-corruption plan) and international (ISO 37001) in the field of corruption (ISO 37001).



WASTE

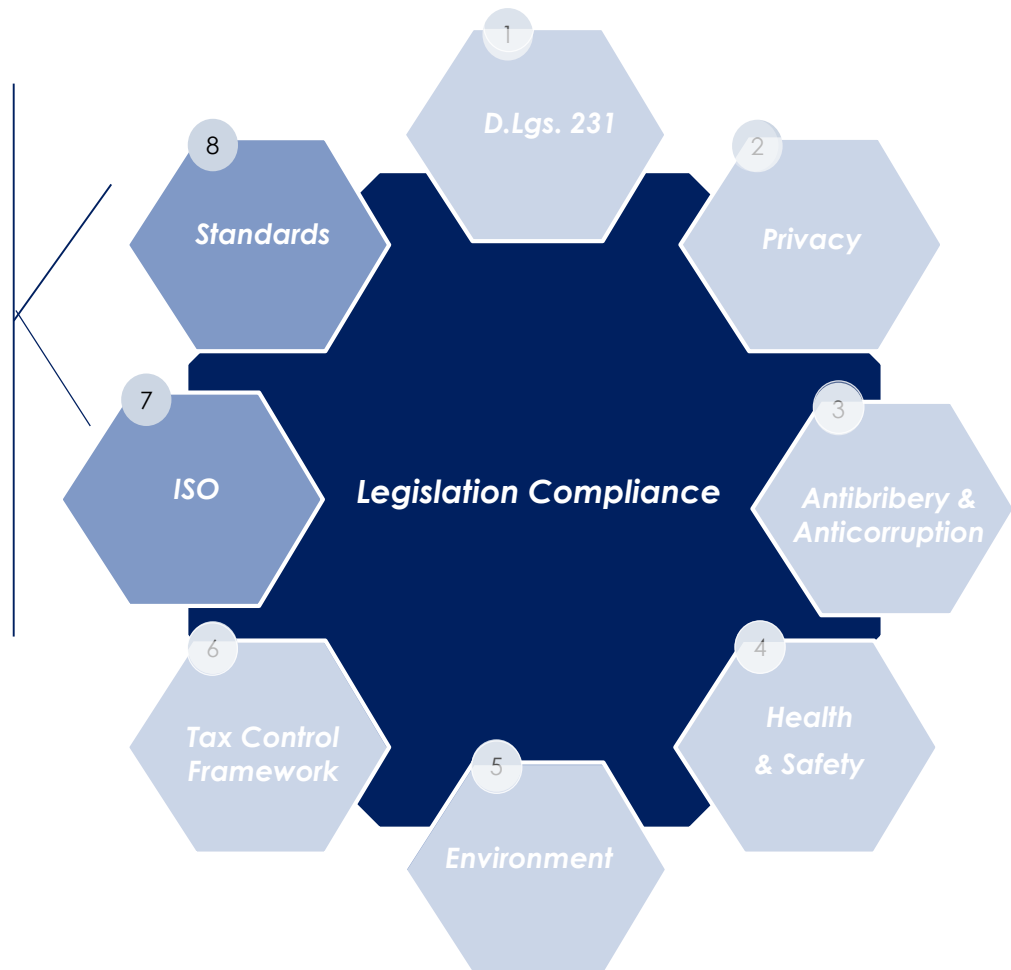
- Report identifying waste;
- Report MUD waste;
- Enrollment of Albo Gestori Rifiuti;
- Check the presence and compilation of the registers of Albo Gestori Rifiuti;
- Technical advice on vehicles for authorization of the transport of waste;
- Register to the SISTRI system.

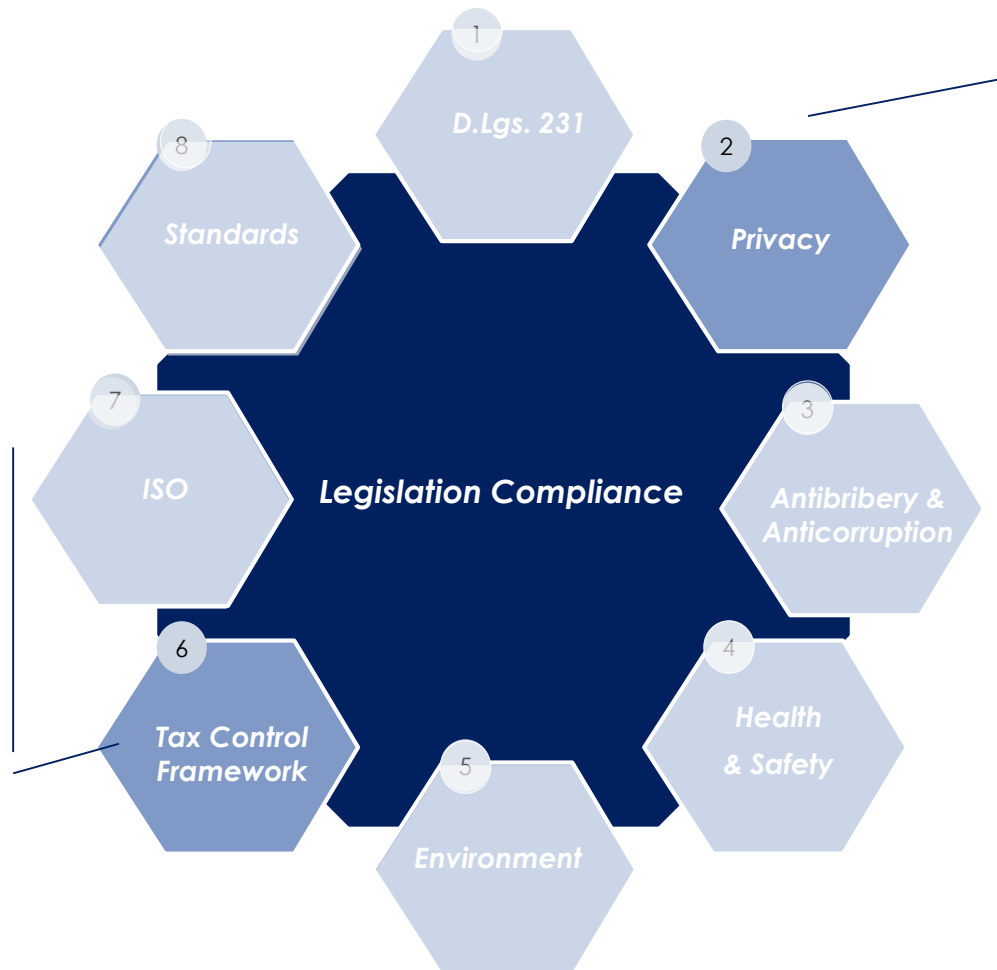
WATER

- Authorization to discharge industrial water and civil waters into surface waters;
- Authorization to discharge industrial water and civil waters into the sewage system;
- Request concessions for the extension and reporting of wells for drinking and for IRRIGUO use (agriculture);
- Annual statement of the quantity and quality of water discharges;
- Annual statement of the amount of water taken from the well.

CERTIFICATION

- Assistance, support and coaching activities for the implementation of certified management systems:
- ISO 9001 Certification system for quality management;
- ISO 14001: Environmental management system;
- BS OHSAS 18001: Occupational health and safety management system;
- SA 8000: Management System for Corporate Social Responsibility;
- ISO 22000; ISO 22005; GLOBAL G.A.P.; BRC;
- IFS: Management Systems for Food Safety and Traceability of food for HACCP;
- ISO 13009 "Tourism and related services. Requirements and recommendations for the operation of the beach".



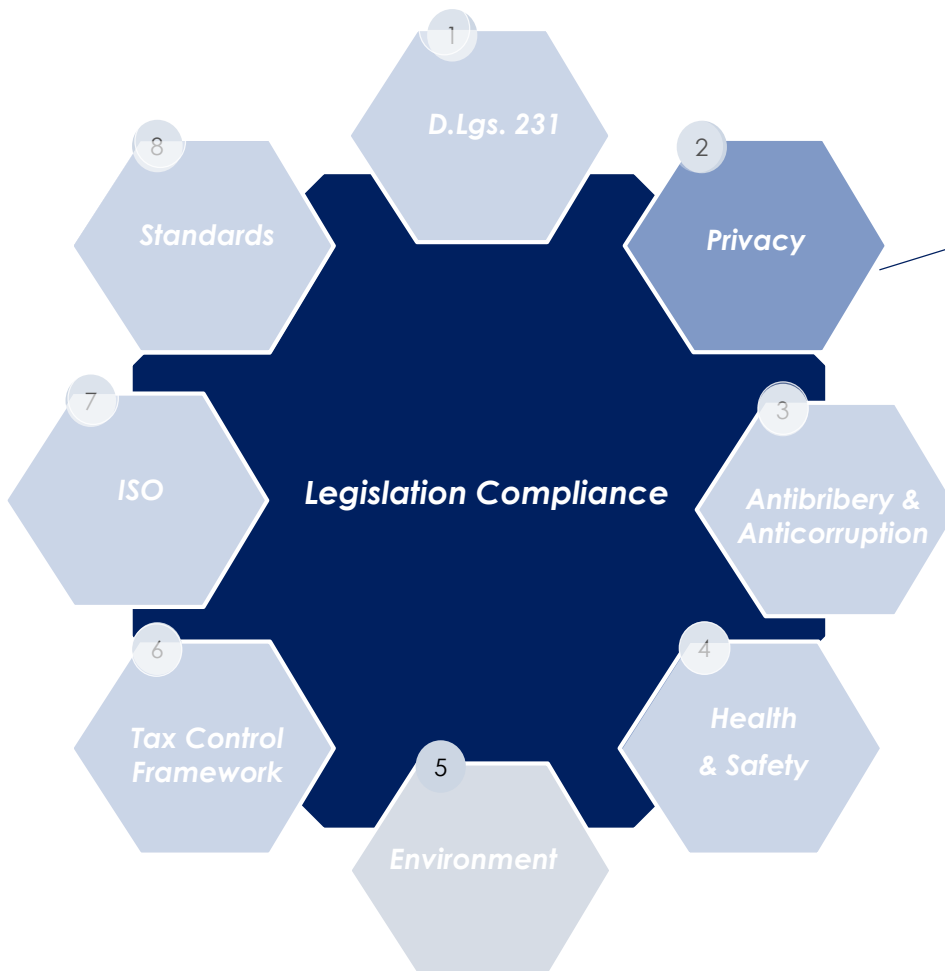


TAX

D. Lgs. 128/2005, Collaborative Compliance - Provisions on legal certainty in relations between tax authorities and taxpayers: design and implementation of a model for the management of fiscal risk - Tax Control Framework - also integrated with the 231 Model.

PRIVACY

- Regulation (EU) 2016/679: European Regulation on the protection of personal data;
- D. Lgs. 196/03: Code regarding the protection of personal data, from the preparation of information to gap analysis of the measures provided by the company on privacy and subsequent remediation plan, as well as professional training activities.



PRIVACY IMPACT ASSESSMENT

Analysis of risk management parameters of the impact of data processing on the freedoms and rights of the persons concerned

REMEDIATION PLAN

- establishment of the **Register of Treatments**
- Preparation of improvement actions (**Procedures, information, etc.**)

DATA PROTECTION OFFICER (DPO)

Appointment of a professional who performs day by day consultancy on the implementation of the system and on the updates that become necessary

DATA BREACH

In the event of a personal data breach, the controller shall **notify the competent supervisory authority of the violation**

- Implementation corporate training plans funded through Interprofessional Funds;

- Support in the management and organization of human resources, also with reference to the drafting of job description

- Support in dimensional and strategic growth processes

MANAGEMENT CONSULTING

- Definition and implementation of the corporate communication mix

- Governance Analysis and Design, from the analysis of the system of delegations and powers of attorney to the organizational definition as a whole through the preparation of Organizational Communications, Operating Instructions, Procedures, Circulars, Organization Charts, etc.

- Drafting of marketing and communication plans

- Support in internationalization processes

www.codesrl.net

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