

DEONTOLOGICAL GUIDELINES FOR THE ACTIVITIES OF THE ITALIAN CHAMBER OF COMMERCE IN JAPAN

Introduction

In this document, unless the contrary intention appears:

"ICCI" means Italian Chamber of Commerce in Japan.

The mission of ICCJ is to promote the development of economic and trade relations between Italy and Japan as well as to enhance their Members' value by implementing an accurate customer satisfaction policy according to laws and regulations in force in Japan and by observing equity and transparency management norms.

In order to carry out its activities, ICCJ must demand to its Representatives to adopt a code of conduct based on principles of ethic and social responsibility as well as fair trading in internal and external relations.

Moreover, ICCJ, as ASSOCAMERESTERO member, must comply with the rules and principles governing this association.

1) Code of conduct

ICCJ, through their Representatives, commit themselves:

- To take proper attitudes and respect integrity, fairness and transparency standards, both in and out the Chamber.
- To manage personal data and reserved information in accordance with Privacy legislation issued in Japan
- Not to infringe, under no circumstances, international embargo acts as well as contingent and control legislations on import and export.
- To respect trade competition and conflict of interests.
- Not to carry out activities that can bring about administrative and criminal offences in compliance with Italian legal system as well as the Japanese one.

2) Conflict of interests

Conflicts of attributions (or conflicts of interests) are situations of contrast for ICCJ Representatives vested, at the same time, both with administrative functions within ICCJ and controlling and decision-making functions in entities that, for several reasons, come into contact with ICCJ.

Typical situations of contrasts are those cases when consultancies or services requests addressed to ICCJ are first intercepted and then executed by the entities to whom the ICCJ representatives belong, as well as soliciting and/or making business on behalf of third parties while servicing tin the capacity of ICCJ Representative.

In case of situations of contrast, the relevant ICCJ Representatives on his own initiative must declare the situation of contrast to ICCJ and temporarily abstain himself for the role of Representative until the end of said situation of contrast. In case of doubt, the Board establishes whether there is a situation of contrast.

The lack of self-declaration by the ICCJ representative causes the immediate suspension and expulsion from ICCJ.

[&]quot;ASSOCAMERESTERO" means Association of the Italian Chambers of Commerce Abroad.

[&]quot;Representatives" means the President, the Board of Directors, the Secretary General and ICCJ Staff.



3) Internal relations

ICCJ, through its Representatives, Sector Managers and all the Staff, commit itself:

- To maintain a decorous working environment in observance of human dignity and laws in force
- To make a scrupulous use of all property belonging to ICCJ in order to protect the value.
- To offer equal promotion opportunity to all the Staff.
- To consider unacceptable any mobbing situation or undesired acts linked to religion race, gender, personal or physical discrimination that can violate human dignity.
- To appoint and elect ICCJ Representatives who must fulfil their office according to the exclusivity principle. This
 implies incompatibility with other possible professional activities in the country where they were elected or
 appointed as it could come into conflict or limit their office.
- Not to hold double office (i.e. President and Secretary General) in the same ICCJ or in more Italian Chambers of Commerce abroad (i.e. President or Secretary General in two Chambers of Commerce) but only for exceptional circumstance, a temporary and provisional situation, that must be restored by appointing or electing a new responsible of the office.

4) External relations

ICCJ, its Representatives, its Sector Managers and its entire Staff must act in professional relationship with third parties observing good faith, loyalty, fairness, and responsibility and transparency principles. In particular, they commit themselves:

- To perform their off in accordance with ICCJ mission.
- Not to utilize ICCJ to develop private business not related to ICCJ mission.
- To perform lobbying activities (where allowed) with Public Institutions both in Italy and in Japan through the
 responsible bodies and authorized by ICCJ statute (usually the President and/or the Secretary General) and observing
 rigorously the laws in force
- Not to allow the performance of any chamber activities that can directly or indirectly be involved in political and party purposes as ICCJ is an association with economic and trading aims.
- To select service suppliers according to their off product quality, innovation, costs and services.
- To maintain relations with media sector only through Representatives (usually the President or the Secretary General) or managers assigned to the relations with the information sector.
- To adhere as member of ASSOCAMERESTERO to the solidarity and collaboration principle among the Italian Chambers of Commerce abroad.

These guidelines have to be mandatorily read and accepted by signing this document by all the ICCJ Representatives. Automatically exclusion from ICCJ shall take place in case of failure in fulfilling this requirement.