



ASSOCAMERESTERO
ASSOCIAZIONE DELLE CAMERE DI
COMMERCIO ITALIANE ALL'ESTERO

Ethical Guidelines for the operations of the Italian Chambers of Commerce Abroad

June 2025

Introduction: mission and identity of the CCIE

The mission of an Italian Chamber of Commerce Abroad (*Camera di Commercio Italiana all'Estero*, CCIE) is to foster economic and trade relations between Italy and the host country, providing Italian businesses and organisations with qualified advice and strategic connections through a tailored and business-oriented approach, and ensuring a constant continuous presence on the ground (including, where possible, for local lobbying activities) through the strong ties built up by its members and staff in the countries in which they operate. The CCIEs also cooperate with Italian authorities to plan and implement promotional and commercial development activities abroad, creating an ecosystem that facilitates the exchange of goods, services, technology, know-how and capital. They also serve the purpose of fostering a collaborative environment, achieved through sector-specific events, networking with qualified partners and advanced market analyses, as a means of strengthening the overall credibility of the CCIE brand and promoting the long-term success of businesses.

In a nutshell, Italian Chambers of Commerce Abroad, as an integral part of the Italian System, are partnerships established by companies committed to promoting Italy worldwide, growing and improving Italian business communities abroad and bringing them together with foreign companies interested in the Italian market. Each Chamber also contributes to building communities linked to Italy, attracting operators, tourists and investors to and from the host country, thereby creating an environment conducive to development. Independently run, they are primarily financed by the market and governed by a Board of Directors, comprising mainly business leaders from the private sector, who share the goal of spearheading sustainable prosperity for all their stakeholders.

Each CCIE acts by the laws and regulations of both the host country and Italy (since they also receive subsidies from the Italian State), to the extent that the latter are consistent with the former, and also complies with the principles of substantive democracy, fairness and transparency in their management.

In carrying out their operations, the CCIE requires its representatives and boards, as well as its partners, to comply with the principles of ethical and social responsibility, actively involving its partners and ensuring maximum transparency and the periodical renewal of the membership of their elected bodies, as well as the fairness of their practices, both within the CCIE network and towards third parties.

Furthermore, each CCIE, in its capacity as a partner, is required to comply with the rules and regulations of the umbrella association Assocamerestero.

1) General rules of conduct

Each CCIE, through the actions of its directors and Secretary General, is committed to:

- ☛ engaging in proper conduct and complying with standards of integrity, honesty and transparency, both within its organisation and in its external relations;

- ④ treating personal data and confidential information by the privacy legislation of the host country. In the absence of local legislation on the matter, the EU regulation shall be used as a yardstick;
- ④ not violating, directly or indirectly, under any circumstances, international laws on embargoes, checks and quotas on inbound and outbound trade flows;
- ④ complying with the rules and practices governing competition and conflicts of interest, and preventing the risk of money laundering or the financing of crime and terrorism, also by adopting ad hoc procedures, such as KYC (Know Your Customer) or other regulatory requirements laid down by European directives;
- ④ not carrying out activities that could constitute an administrative or criminal offence, under the laws of both the host country and Italy.

With regard to the first point, the President, the Secretary General and the entire Board of Directors shall ensure that the directors, employees and freelance contractors of the CCIE do not breach the conflict of interest requirements in the performance of their duties, as specified below. Should a potential conflict of interest arise, the Board of Directors shall immediately take all necessary steps to prevent the materialisation of the relevant risks. Any conflict of interest situations, along with the rules approved by the Chamber's Board of Directors for their effective handling, shall be communicated to Assocamerestero and recorded in an ad-hoc register kept by the CCIE. This register shall be promptly updated each time any changes in the situation are reported.

In any case, the CCIEs shall complete a self-declaration questionnaire – similar to the those required under the Anti-Money Laundering and Combating the Financing of Terrorism (AML / CFT) policies, primarily with regard to any pending charges – possibly already in the early stages of the evaluation of the candidates to positions at each CCIE. This should be viewed as a measure to bar persons with a criminal record, convicted by a final judgment, for having intentionally or negligently committed serious crimes during the performance of business or trading activities, or while in public service, from holding senior positions (President, Vice-President, Board Member and Treasurer), as well as Secretary General, excluding minor offences (such as minor breaches of the highway code or the application of small fines, etc.) and/or matters relating to the personal sphere, albeit fully in accordance with the principles of integrity, fairness, good faith and good conduct. It follows that each CCIE shall undertake to ensure that any person holding any such position or employment within its organisation, who has been finally convicted of any such crime (other than a minor offence) shall be immediately and automatically removed from their position. The said self-declaration questionnaires – to be administered, subject to the privacy legislation of the host country, to all persons holding the positions of President, Vice-President, Board Member and Treasurer – shall be brought to the attention of Assocamerestero, in the person of its President and Secretary General, so that it may, if necessary, initiate the procedure referred to in Article 13 of the Bylaws and Implementing Regulations.

If criminal proceedings (other than with regard to minor offences) are initiated, or are likely to be initiated, against any of the above-mentioned officers, the interested party shall promptly inform the Chamber Council, which shall evaluate the relevance of the criminal proceedings and, based on the binding opinion of the Board of Presidents (*Collegio dei Presidenti*) of the relevant Region, shall

decide whether to suspend that officer until they are either convicted or acquitted, or until they resign from office. The subject of such criminal proceedings, initiated or at risk of being initiated, shall, in any case, provide regular updates on the progress and nature of such proceedings. Each CCIE may, in any case, consider the need to introduce less protective and more stringent measures in the specific area of application, for example by requesting a criminal record certificate – in the host country and/or in Italy – from the said officeholders.

It is also desirable that:

- ☛ the CCIE involves the Ethics and Disciplinary Committee (*Collegio dei Probiviri*) (or, if not provided for in the Bylaws, establishes an ad hoc committee), to assess whether the rules set out herein comply with the applicable regulations of the Country of origin;
- ☛ the Board of Presidents of each Region assesses the reputational impact on the chamber network of any conduct and events contrary to the general rules of conduct specified above, inviting the Council of the relevant CCIE to implement the necessary measures to combat such behaviour.

In any case, each CCIE undertakes to consistently oversee the conduct of its directors and partners (especially in the case of CCIEs whose Board of Auditors – *Collegio dei Sindaci o dei Revisori* – is composed of members elected from among its numbers) who do not enjoy a good reputation, in Italy or in the host country, so as to avoid problems for both the Chamber and the network of CCIEs, possibly also involving the local Italian diplomatic authorities.

Furthermore, the CCIEs may require any new partners to provide references from other partners (especially in the case of partners operating in the host country of the CCIE) or, in the case of Italian partners, from the competent Italian-based Chamber of Commerce (CCIAA). No more than ten business units belonging to the same group or holding, or three individuals with close personal ties (spouses, children, parents, siblings and other relations up to the second degree of kinship) may be registered as partners with voting rights of the same CCIE. In either case, such partners may not represent more than 10% of the partners with voting rights. In any case, no more than one representative or employee of the same company or business unit belonging to the same group, understood in its broadest sense, or holding, may serve on the Board of Directors of the same CCIE.

It is also emphasised that the members of the board (in particular, the President and Vice-President), the Treasurer and the Secretary General of the CCIE may not hold political office in Italy or abroad, nor accept a public position that could lead to the perception that the Chamber endorses their opinions. Should any of these roles decide to stand for elected political office, they will be required to suspend themselves from their position until the relevant elections and, in any case, to immediately tender their resignation if elected. In this case, too, it will be the Chamber Council – based on the binding opinion of the Board of Presidents of the relevant Region – that will decide which political offices – whether in the host country or in Italy – shall be affected by this measure.

Last but not least, it is established that:

- ④ any operations and projects carried out “in person” shall be carried out within the boundaries of the territory within which each CCIE operates (meaning the regions/administrative units of the cities where the CCIE has set up a permanent organisation, with an office – owned or rented – and employees) or, alternatively, shall be carried out jointly by the CCIEs concerned, unless specific bilateral agreements have been entered into between the Chambers involved (if the territorially competent CCIE is unable or uninterested in participating in the project) and without prejudice to the possibility of collaborating with the relevant Embassy and recruiting members outside the said boundaries;
- ④ in the case of two or more CCIEs operating in the same country, it is mandatory to clearly specify the region (or regions) over which each CCIE has jurisdiction, by including a clear reference thereto in the name of the Chamber, or in its Bylaws, or by entering into ad hoc agreements between the CCIEs, which shall be made known to all possible interested parties.

Assocamerestero firmly and clearly reprovves any form of trespassing or encroachment by one CCIE into the territory subject to the jurisdiction of another CCIE, and supports the application of appropriate sanctions for CCIEs that breach such regulations, by Article 13 of the Bylaws.

2) Internal relations

The CCIEs as a whole – representative bodies, management bodies, employees at all levels – undertake to:

- ④ maintain a decent working environment, respecting the dignity of all people and complying with the applicable laws;
- ④ scrupulously use the CCIE’s assets in a manner that protects their value;
- ④ promote gender equality in appointments to offices and positions within the association;
- ④ offer equal opportunities for career advancement to all employees (equal opportunities);
- ④ consider as unacceptable any kind of harassment or undesirable behaviour that may violate human dignity, in relation to religious beliefs, race, gender and other personal and physical characteristics;
- ④ prevent the occurrence of repeated and intentional abuse, intimidation, harassment or psychological violence in the workplace (mobbing).

Furthermore, it should be noted that the offices of President, Vice-President (where applicable) and Secretary General are incompatible with other positions in entities and companies (as defined in point 4 of this document) that may influence and compromise the impartiality and effectiveness of the decisions relating to the activities of the CCIE. Such incompatibilities shall in any case be verified and reported in order to prevent their occurrence. Furthermore, each CCIE is obliged to:

- ④ ensure that the Secretary General performs their duties, in accordance with the “Profile of the Secretary General of Italian Chambers of Commerce Abroad” approved on 10 July 2009 by the inter-departmental committee of the Ministry of Economic Development;
- ④ ensure that the same individual does not hold two positions (e.g. President/Vice-President and Treasurer) in the same CCIE, except in exceptional circumstances, on a temporary and transitional basis, pending the return to normality (appointment of the new officeholder). In any case, the Secretary General shall not also hold the offices of President, Vice-President or Treasurer in the same or other CCIE with which they have no employment ties.

3) External relations

The CCIE, its employees, representative bodies and management, are required to act by the principles of good faith, loyalty, fairness, responsibility and transparency in their relations with third parties. In particular, they undertake to:

- ④ engage in behaviour that is consistent with the purpose of the CCIE;
- ④ carry out lobbying activities (where permitted) towards public institutions, both in Italy and in the host country, through the responsible bodies (generally the President and/or Secretary General) and in strict compliance with the applicable laws;
- ④ not allow any activities that may be directly or indirectly linked to political and/or party purposes on the Chamber's premises, nor to sponsor or promote such activities. In the case of guest speakers affiliated with a political party speaking at an event hosted by a Chamber, it shall provide for the participation of other politically-affiliated speakers to speak on equal terms;
- ④ select service providers based on their ability to offer quality, innovation, costs and services, also taking into account the applicable procurement regulations, if any, in the host country;
- ④ maintain relations with the media and public institutions, as a rule, only through designated officeholders (generally, the President and Secretary General), authorised to engage in relations with the media and to use social media. The members of the Chamber Council are nevertheless required to exercise restraint and moderation in their comments, including any personal statements, which should always be aimed at promoting cohesion between the members of the Chamber and the other actors in the Italian System;
- ④ not disclose information and documents acquired in connection with the Chamber;
- ④ as part of the CCIE network, adhere to the principle of solidarity and collaboration with other CCIEs, by the “General Rules of Conduct”.

4) Incompatibility and conflicts of interest

The employees and Directors of the CCIE or Assocamerestero who become aware of any potential cases of incompatibility, or, as specified below, a conflict of interest situation that has been poorly managed or not managed at all, shall immediately report the situation to the Board of Directors of the competent CCIE and to the President and Secretary General of Assocamerestero, who are obliged to take prompt action to resolve the situation of incompatibility.

Incompatibility arises when the President, Vice-President, where applicable, or Secretary hold the position of (direct or indirect) shareholder, President, Chief Executive Officer or employee of a private or public company that provides services in direct competition with the CCIE or provides services to the CCIE. This incompatibility does not extend to other members of the Board of Directors or to employees or freelance contractors of the CCIE; in such cases, however, it constitutes a potential conflict of interest that shall nevertheless be declared and managed effectively, to remove any potential risks associated with the conflict.

A conflict of interest arises when a member of the Board of Directors, an employee or freelance contractor of the CCIE, in making decisions on behalf of the CCIE, is exposed to the risk of a personal interest (financial, economic or personal ties) that could influence their impartiality and lead them to take decisions that are not in the best interests of the CCIE.

For example, an employee, freelance contractor or director of the CCIE who holds a position (director, employee, consultant or collaborator) or is a (direct or indirect) shareholder or has close personal ties (spouses, children, parents, siblings and other relations up to the second degree of kinship) with persons who have a significant role in a company that offers services in direct competition with the CCIE or that offers services to the CCIE itself, may be in a potential conflict of interest since they may be influenced in their decision-making, thereby disadvantaging the CCIE. An example of how to manage such a conflict of interest is when the employee, freelance contractor or director of the CCIE is not involved in taking decisions regarding the selection or management of a supplier, or does not have access to sensitive information about the operations of the CCIE that could compete with the company in which they hold a position (as a director, employee, freelance contractor or consultant) or is a (direct or indirect) shareholder or has close personal ties with persons holding senior positions.

5) Dispute management

In the event of disputes arising out of or with regard to the interpretation and application of these ethical guidelines, and the consequences thereof, Assocamerestero shall first engage in an attempt to reach an amicable settlement. If this proves unsuccessful, a sanctioning mechanism will be applied in accordance with Article 13 of the Assocamerestero Bylaws, which, taking into account the role of the Ethics and Disciplinary Committee in resolving disputes arising from any conduct that is clearly contrary to the purposes of Assocamerestero, may facilitate compliance with the above rules.

Pending a specific assessment of the specific cases of violation of this Code and taking into account the opinion of the Ethics and Disciplinary Committee (and, where necessary, the opinion of the Board of Presidents of the Region involved), at least three types of sanctions may be identified, on a preliminary basis:

- ① firstly, with regard to the rules of conduct applicable to internal and external parties (for any behaviour contrary to the purpose of the Association, including the encroachment of one CCIE on the jurisdiction of another), suspension from the Association for a period of between six months and two years;
- ② secondly, with regard to administrative or criminal offences, under the legislation of both the host country and Italy, committed by representatives of the CCIE (specifically, the President, Vice-President, Treasurer, directors and the Secretary General), in the absence of the self-suspension or immediate resignation of the interested party, a disciplinary action taken against the CCIE, namely suspension from the Association for a period of between three months and one year;
- ③ thirdly, in the case of a clear situation of incompatibility of the President, Vice-President (where applicable) and Secretary General, as well as of conflicts of interest that have been poorly managed or not managed at all, a disciplinary action taken against the CCIE, namely suspension from the Association until such time as the incompatibilities are removed or the conflict of interest is resolved satisfactorily, for a period of at least 3 months.

At the end of the specified suspension periods, if it is found that the breach has not been resolved, the General Council of Assocamerestero may, in accordance with the Bylaws, decide to revoke membership and/or request the initiation of the procedure for revoking their recognition by Italian Ministries (MIMIT and MAECI).