

ETHICS POLICY

The Company Management has prepared the Organizational Model so that allows all its employees and collaborators to be aware of their rights and to correctly assign tasks based on their experience, competence and suitability.

It has also prepared the Protocols that have been brought to the attention of all the managers and interested parties for compliance with these principles, through the practical observance of simple but effective rules, which have the purpose of providing adequate demonstration of compliance with the rules applicable in each circumstance.

The Ethics Policy promotes, within and outside the Company, behaviors inspired by the guiding values that are summarized in the Charter of Values shown on the last page of this document.

The Ethics Policy contains the rules of conduct that each collaborator at any level is required to observe and to enforce towards and for the benefit of all those who interact with the Company: work colleagues, customers, suppliers, executing companies, shareholders, entities, authorities, community members, financial market, etc.

The provisions contained in the Ethics Policy aim to recommend, promote or prohibit certain behaviors, in full compliance with the provisions of the law in force.

The Board of Directors, the Chief Executive Officer, the external Supervisory Body and all the Management Functions of the Company will take all the most appropriate initiatives to fully implement the rules of conduct contained in this Ethics Policy.

Principles

The Company believes that ethical principles must be respected by each of its members.

These principles are represented by the utmost respect for:

- human dignity in all its forms and racial, ethnic, national or religious equality;
- the care and protection of the health and physical and moral integrity of its workers and collaborators;
- fairness in commercial relations with suppliers and customers;
- transparency in relations with the Public Administration and / or supervisory and control bodies in all their forms and expressions.

The Company, with reference to the aforementioned racial, ethnic, national or religious equality, rejects and denies any type of expression of racism and xenophobia, as well as any form of participation in organizations, associations, movements or groups having among their own purposes incitement to discrimination or violence on racial, ethnic, national or religious grounds, as well as propaganda or incitement and incitement.

On the basis of the general principles summarized below, the Company Management has prepared the Organizational Model and all the documentation required by Legislative Decree no. 231/2001; this Model allows all employees and collaborators to be aware of their rights and the correct assignment of tasks based on their experience, competence and ability.

It has also prepared the individual Protocols that have been brought to the attention of all the managers concerned so that they ensure compliance with the principles contained therein, through the practical observance of simple but effective rules; the Protocols are intended to provide adequate demonstration of how the specific rules of each specific area are correctly applied and verified.

Validity, applicability and publicity of the Ethics Policy

The Ethics Policy applies to the Directors and employees of the Company. In addition, the Company strives to ensure that customers, suppliers and all external collaborators adopt behaviors inspired by the same rules of conduct represented therein.

The Ethics Policy, as defined in this document, is valid both in Italy and abroad; the methods of implementation of the principles contained therein will take care to respect the cultural, social and economic diversity of the various countries in which the company operates.

The Ethics Policy is brought to the attention of internal and external stakeholders in the most appropriate manner, in accordance with the local laws and customs of the various countries.

These methods of communication provide for the delivery of this document (and its future updates) and the relative acknowledgment of receipt for all employees.

This method is equivalent to the affixing of the Ethics Policy in the company register in accordance with current legislation on labor law.

For Company Collaborators, the Ethics Policy is available at the company Intranet address, while for all those who are interested it can be freely consulted on the company website.

The rules of conduct contained in the Ethics Policy are complementary to the provisions of the law, regulations, organizational communications valid in the various legal systems.

Rules of behavior

Compliance with laws, regulations and company procedures

The Company assumes as an essential principle, in the conduct of its business and in the management of internal and external relations, compliance with the laws, regulations and any other regulatory provisions in force in the countries in which it operates - including the "231 System".

Each employee is required to comply with the principles contained in the Ethics Policy, as well as to scrupulously observe all the laws, regulations and internal procedures adopted by the company and brought to their attention.

In no case will be allowed - nor justified by the pursuit of the corporate interest - deviant conduct and / or in violation of the aforementioned rules by employees or third parties acting in the name and / or on behalf of the Company.

The Company attaches primary importance to the full compliance with the provisions of Legislative Decree 8 June 2001 no. 231 "Discipline of the administrative liability of legal persons, companies and associations even without legal personality, pursuant to art. 11 of the Law of 29 September 2000, n. 300 "and its subsequent amendments and additions.

To this end, the Company has prepared and adopted an "Organization, Management and Control Model" consistent with the provisions contained in Legislative Decree no. 231/01.

The Organizational Model guarantees the right, without retaliation, of each worker to report to the Supervisory Body, unlawful behavior of colleagues or superiors of which they have had precise and detailed knowledge, in order to protect the superior good of continuity. of the company, through the so-called "whistleblowing".

Internal relations - Protection of workers' rights and dignity

The Company considers respect for human rights in general, the protection of working conditions and the protection of the physical and moral integrity of its employees and collaborators in particular a primary value.

The relationships between colleagues who operate, at any hierarchical level, in all the realities (national and international) of the Company must be based on mutual respect, transparency, fairness and good faith, without discrimination of sex, nationality, religions, customs and costumes.

In the corporate sphere, relations between colleagues must aim at building a climate of professional collaboration and mutual cordiality; the Managers are entrusted with the role of example with respect to their collaborators.

Each Manager must strive to enhance the human resources entrusted to him and ensure that the professional activity takes place in a climate of motivation, participation and responsibility; the assessments must be carried out exclusively on the basis of principles of individual meritocracy and for no reason behaviors aimed at obtaining personal benefits through one's professional activity will be tolerated.

The implementation of the aforementioned principles is entrusted, in particular, to the highest hierarchical levels who must implement every initiative aimed at promoting, in cascade, the involvement of all employees in the achievement of company objectives and in the fulfillment of their specific tasks.

Behavior that does not comply with the principles adopted with this Ethics Policy must be promptly detected and will be sanctioned in compliance with the laws and regulations in force regarding the employment relationship.

Confidentiality of Information – Privacy



The Company guarantees, in accordance with the relevant legal provisions, the confidentiality of the information in its possession or of which it becomes aware of.

The right to privacy is an inalienable right for each collaborator and employee and, as such, must always be respected and harmonized, with company provisions that protect and safeguard the assets, know-how and image of the Company.

Loyalty and Conflict of Interest

Each employee and collaborator of the Company at any level and in any role is required to behave in loyalty and correctness towards the company and undertakes to operate in the absence of conflict of interest in the performance of their duties and in the management of operations and / or transactions of one's own responsibility.

A conflict of interest, actual or potential, occurs when an employee or collaborator of the Company carries out, within or outside the Company, activities or behaviors that:

-  may in any way harm the interests of the company;
-  imply the obtaining of direct and / or indirect benefits in favor of the employee, the collaborator, his family members or third parties by using or abusing the assets, resources, know-how and function held within the Company .

Assets owned by the Company:

Corporate assets

All tangible assets of which the Company owns, possesses or rights of use and which are made available to employees for the exercise of their work (by way of example: hardware tools, software licenses, e-mail, equipment telephone, motor vehicles, machinery, plants, etc.) constitute company assets and as such:

- ✚ can be used by employees and collaborators only if expressly authorized;
- ✚ must be used correctly and for the purposes for which they were made;
- ✚ if transported or transferred outside the companies, they must be properly guarded in order to avoid theft, loss and / or damage resulting from negligence, inexperience, etc.

Company-owned assets, unless expressly derogated, must be used exclusively for business and non-personal purposes, with the absolute prohibition of:

- ✚ use to benefit and / or profit for oneself or for third parties;
- ✚ use (with particular reference to IT tools and the internet) for leisure and non-professional purposes, especially if they can damage the decorum and ethics of the company and its employees.

Intellectual property

The exclusive Intellectual (or Industrial) Property on which the Company has the widest faculty of use, consists of all technical information, know-how, patent, trademark, written and anything else created by the Company and / or by its employees as part of their professional activity in the company or for the company.

The Company may take any appropriate initiative, in compliance with the provisions on the matter by the various legal systems, aimed at preserving Intellectual Property and to verify that employees and collaborators do not carry out acts aimed at violating or damaging in any way the rights deriving from the Intellectual Property itself..

Gifts

No form of gift is permitted that can be considered as exceeding normal commercial or courtesy practices (and in any case not exceeding the modest amount established in Euro 150.00) or interpreted as aimed at

acquiring favorable treatment in the conduct of any activity related to the interests of the Company and its Stakeholders.

External relations:

Customers / Clients

The relations with customers / clients must aim at excellence in the execution of the work, in service and quality; they must be inspired by principles of transparency and correctness and good faith; they must comply with market and competition rules

Providers

The selection of suppliers and negotiation must take place in a transparent manner, in compliance with the regulations applied in the various countries and must comply with rigorous parameters of competitiveness, objectivity, fairness, price and quality of the good and service.

Public Administration

Relations with the Public Administration can be managed exclusively by the company functions specifically delegated and authorized for this purpose; such reports must:

- be based on transparency, correctness, independence and impartiality;
- comply with the regulations applicable in the various countries;
- guarantee certainty of the methods of communication in order to avoid incorrect interpretations in the reconstruction of the procedures followed

The same principles must be followed by all those who are responsible for corporate and corporate communications.

Health, Safety at Work and Environment Policy

Respect for health, individual and collective safety and the environment are fundamental and mandatory principles of the Company and of the entire Management; the achievement of these objectives must guide all the Company's decisions and guide the individual behavior of all employees and collaborators.

Industrial development must be "sustainable", balanced, responsible and appreciated by the social community.

The Company is committed to achieving this goal through two main areas of intervention: applicazione delle migliori tecnologie disponibili

- involvement of all people through targeted training actions that foster responsible behavior in all those who work and interact with the company.

In relation to activities with possible environmental impact, the Code of Ethics sets out the commitment of top management to comply with current environmental legislation and to implement preventive measures to avoid or at least minimize the environmental impact.

The sharing of these values should also be extended to other parties outside the company structure, linked to the Company by contractual relationships, through specific contractual clauses.

In particular, in the Code of Ethics, the Company can propose to:

- a. adopt measures to limit and - if possible - cancel the negative impact of economic activity on the environment not only when the risk of harmful or dangerous events is demonstrated (principle of preventive action), but also when it is not certain whether and to what extent the business activity exposes the environment to risks (precautionary principle);
- b. favor the adoption of measures to prevent any damage to the environment, rather than waiting for the time to repair a damage that has now been done;
- c. plan an accurate and constant monitoring of scientific progress and regulatory changes in environmental matters;
- d. promote the values of training and sharing the principles of the code among all the subjects operating in the Company, top management or subordinates, so that they adhere to the established ethical principles, in particular when decisions must be made and, subsequently, when they must be implemented.

Relationship with shareholders

The Company aware of the importance of the role played by the Shareholders, undertakes to provide accurate, truthful and timely information and to improve the conditions for their participation, within the scope of their respective prerogatives, in corporate decisions.

It is the Company's commitment to protect and increase the value of its business, in response to the commitment made by the shareholders with their investments, through the enhancement of management, the pursuit of high standards in productive uses and the solidity of assets. The Company also undertakes to safeguard company resources and assets.

In particular, the Company undertakes to ensure the regular participation of the Directors in the meeting proceedings as well as to guarantee the orderly and functional conduct of the meetings, in compliance with the fundamental right of each Shareholder to request clarifications on the various topics under discussion and to express their own opinion.

Contractual value of the Ethics Policy

Compliance with the rules contained in the Ethics Policy must be considered an essential part of the contractual obligations of all employees, pursuant to and for the purposes of the applicable regulations.

The violation of the principles and contents of the Ethics Policy may constitute a breach of the primary obligations of the employment relationship or a disciplinary offense, with all legal consequences also in relation to the preservation of the employment relationship and lead to compensation for damages deriving from the same. It may also form the basis for the application of the penalty system expressly provided for by Legislative Decree no. 231/01.

CHARTER OF VALUES

INTERNAL REFERENCE VALUES	MEANING OF VALUE (EXPECTED BEHAVIOR)	
	IN POSITIVE	IN NEGATIVE
Determination and Belief	To be a stimulus and example in supporting the corporate mission / vision even in the face of difficulties .	Accepting compromises for quiet living and / or indifference.
Respect and Trust	Taking into account the diversity of opinions and characters, always placing oneself on the same level at the human level. The only difference lies in the different responsibilities.	Believing that you know more and more about others.
Transparence and Honesty	Speak clearly and without subterfuge with people, not people.	Do the opposite of what is claimed.
Pursuit for continuous improvement	Finding new stimuli from the results achieved and from the comparison with colleagues.	Limit yourself to doing what is "due".
Reliability and consistency	Keeping commitments made even when they cost us.	Not respecting the commitments made.
Commitment and dedication	Doing one's duty with the heart, spending oneself freely.	Only focusing on one's own task
Simplicity and concreteness	To think, be simple, aiming for the essence and the results.	Orienting oneself to the task and not to the result.
Taste for challenge	To bet that normal people, together, can do exceptional things.	Saying "impossible" before you even thought about it.
Taking responsibility	Filling in company gaps and / or dysfunctions with personal initiative.	Do nothing, stick to your task strictly.
Equality	Respect all types of diversity (eg religious, racial, ethnic, linguistic, sexual, etc.) human dignity and guarantee equal rights and opportunities.	Discrimination, incitement and incitement to racism.