

# Code of Ethics



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## 1. INTRODUCTION.

The Code of Ethics (hereinafter, for the sake of brevity, "Code") - as the set of rights, duties and responsibility of those who adopt it (company, public body, consortium, cooperative, etc.) in the towards stakeholders - represents the "fundamental rule" of the system, adopted

on a voluntary basis, as it outlines and makes explicit the fundamental principles to which it is inspired the very existence of the entity, even before its own business.

This Code, in particular, has been developed to ensure that the principles and values di Nuova Everplastic Srl (hereinafter "Company" or "Company"), are clearly statements and constitute the basic element of the corporate culture. Compliance with the rules indicated in this Code is essential for existence itself, even before the correct functioning, reliability and image of The Company, and is therefore required of both employees and external collaborators. Therefore, it is responsible for identifying the commitments and ethical responsibilities that The Company assumes within the scope of the activity carried out, within the scope of the mission of "producing values by consolidating values".

This enunciation of principles has the purpose of guiding the recipients to respect values which inform all the Company's activities, acting as a guide for all types of operation and behavior in relations both internal and external to the company. In carrying out its business, the Company acts in compliance with the principles of freedom, dignity of the human person and respect for diversity. It favors a work environment that, inspired by respect, fairness and collaboration, allows the involvement and empowerment of Employees e Collaborators with regard to the specific objectives to be achieved and the methods for pursuing them.

The primary purpose of this Code is therefore to clearly define the whole of the values and principles that the Company recognizes, accepts and shares, ensuring a dissemination, information and awareness-raising program on the provisions of the this Code and on the application of the same to the subjects to which it refers, in a way that the Directors, Employees and all those who work for the same can attend to their duties according to a constant and strict observance of the principles e of the values contained therein. It is the Company's duty to supervise compliance with the Code and to adopt, for this purpose, the necessary prevention and control measures.

## 2. SCOPE OF APPLICATION AND STRUCTURE OF THE CODE.

The rules contained in the Code are intended to provide the Company, its employees and collaborators, the principles and lines of behavior to be followed in managing the business, in interpersonal relationships between Recipients and in relationships with interlocutors external members of the Company, understood as all individuals, groups, associations or institutions private or public, including, without limitation, customers and suppliers, whose contribution, in commercial, administrative and financial terms it is generally required to accomplish the object of the Company and who in any case have an interest or a role in your prosecution and all those who, in any capacity, work for the Company, even if they are alone occasionally (the "External Interlocutors").

The principles and provisions of the Code are exemplary specifications of the general obligations of diligence, correctness and loyalty, which qualify the fulfillment of the work performance and behavior in the workplace. They are binding on all members of the governance bodies (hereinafter "Directors"), for all persons linked by employment relationships with the Company (di hereinafter "Employees") and for all those who work for the same, whatever the relationship, even temporary, that is established with it (hereinafter "Collaborators"). The Directors, Employees and Collaborators are defined below jointly "Recipients". The Code - which must be brought to the attention of the Recipients so that it is constant availability on the part of everyone is ensured - it is structured according to the following scheme:

- general principles and values;
- rules of conduct relating to personnel;
- rules of conduct towards third parties;
- penalty regime;
- final provisions.

All employees are obliged to know the rules laid down by this Code, refrain from conduct contrary to them, contact superiors for clarification or complaints, collaborate with the structures appointed to verify violations and not hide to counterparties the existence of the Code. In contractual relationships, the counterparties must be informed of the existence of rules of conduct and must undertake to respect the principles, values and norms of the this Code as applicable to them.

Violation of the rules of this Code can lead to a breakdown of the relationship of trust of the Company with the Recipient who has committed it, with the legal consequences on bond with the Company. The principles and rules contained in this Code integrate the rules of behavior that each Recipient is required to observe, also in compliance with the general obligations of diligence, correctness and loyalty that must characterize the work performance also pursuant to articles 2104 and 2105 of the Civil Code and by collective bargaining.

In any case, these are principles and guidelines which, as such, will not be able to no way to be interpreted as derogations or limitations of the law or regulations contract that eventually govern the single relationships and the single subjects. Therefore, this Code is not intended to replace or supersede laws and regulations national or international applicable but has as a prerequisite compliance with every standard of national and international law, of internal and community regulations and the adoption of an ethically correct and equitable conduct on the part of the Recipients.

provisions and application of the Code, recommending compliance with it.

In particular, the Company takes charge, also through the designation of subjects to whom specific internal functions will be assigned by means of specific deeds:

- the dissemination of the Code to the Recipients;
- the interpretation of the provisions contained therein;
- verification of effective compliance with the Code;
- the updating of the provisions of the Code with regard to the needs that from time to time come to manifest themselves.

### 3.2. RESPONSIBILITY.

Each Recipient carries out his own work and carries out his own performance with diligence, efficiency and fairness, making the best use of the tools and the time at his disposal and assuming the responsibilities related to the obligations, in compliance with current legislation, procedures and competences established by Society.

The Recipients, also in compliance with the legal provisions of the countries in which they operate, they must refrain from engaging in conduct contrary to the rules contained in the Code and must promptly report the following information:

- any news regarding the violation, or potential violation, of the provisions contained in the Code;
- any request for non-compliance or deviation from the Code was theirs submitted.

It is the responsibility of the heads of the individual company functions to make them known subordinates, colleagues and collaborators the importance of compliance with the provisions contained in the Code and direct them to the necessary observance and implementation.

### 3.3. CORRECTNESS.

All the actions and operations carried out and the behaviors put in place by each of the Recipients in the performance of their functions or assignments are inspired by legitimacy under the formal and substantive aspect, according to current regulations and internal procedures, as well as fairness, cooperation, loyalty and mutual respect.

The Recipients do not use either for personal purposes or for the undue advantage of third parties, information, goods and equipment, available to them in the performance of their function o of the assignment.

The Recipients are required to diligently comply with the laws in force, the Code and internal regulations. In no case can the pursuit of the Company's interest justify a conduct that is not honest and does not comply with current legislation. Employees must refrain from carrying out activities in competition with those of the latter (Article 2105 of the Civil Code), must comply with company rules and comply with the precepts of this Code, compliance with which is also required pursuant to e for the purposes of Article 2104 of the Civil Code (Diligence of the lender of work).

Each Recipient does not accept, nor carry out, for himself or for others, pressure, recommendations or reports, which could harm the Company or undue benefits for oneself, for the Company or for third parties. Each Recipient also rejects and does not make undue promises and / or offers of money or other benefits, unless the latter are in line with established uses and, however, always of modest value and not related to requests of any kind.

### 3.4. RESPECT FOR THE PERSON.

The Company promotes respect for the fundamental rights of the person, in accordance with the Universal Declaration of Human Rights of the United Nations Organization, and is committed to ensuring that its business never results in a breach of those rights. For this reason, the Company promotes respect for the psychophysical integrity of the person and guarantees working conditions that respect individual dignity and an environment of safe and healthy work.

The Company promotes the professional growth of Employees and undertakes to avoid any discrimination based on age, sex, sexual orientation, status of health, race, political orientation and religious beliefs. Recognizes and respects the freedom of its Employees to associate or not with any political or trade union organization.

Under no circumstances, the Company will make use of work performed under conditions of constraint, nor of child labor, in accordance with the I.L.O. (Organization Labor International) 138 of 1973 and 182 of 1999.

### 3.5. CONFLICT OF INTEREST.

In the exercise of any business activity, situations must always be avoided, too only potential, conflict of interest, i.e. situations in which an employee, a member of the corporate bodies, an employee or a partner pursues a different interest from that of the Company and / or to the detriment of the same or draws personnel benefit from business opportunities within the company.

The Recipients undertake that every decision concerning the Company's activity is taken in the exclusive interest of the Company, avoiding situations of conflict of interest between personal business and activity performed in fulfillment of one's work activity for the Company that could compromise objectivity and impartiality of judgment or choice.

The Recipients must promptly inform the corporate bodies of the Company of any relationship or situation relevant to the business activities in which they are involved



personal interests or of persons connected to them (such as, for example, family members, friends, acquaintances). The Recipients pursue, in carrying out their activity and / or assignment, the objectives and general interests of the Company, in compliance with current legislation and the this Code, informing the department managers without delay, or in any case i their contacts, situations or activities in which they could be carriers of interests in conflict with those of the Company (or if they are holders of such interests close relatives) and in any other case in which reasons of convenience arise. The Recipients respect the decisions that are taken by the Company in this regard, refraining, in any case, from carrying out operations in conflict of interest.

### 3.6. CONFIDENTIALITY AND PRIVACY PROTECTION.

The Recipients ensure the utmost confidentiality regarding news and information constituting the corporate assets or inherent to the Company's business, in compliance with the provisions of the law, the regulations in force in this Code and the procedures internal, keeping any news and information secret and confidential production, organization and management, company information and technical experience industrial, including commercial, of which they have come to know by virtue of the activity carried out.

The Company undertakes to protect the information relating to the Recipients, generated or acquired within the corporate structure and / or in the management of business relations, e to avoid any improper or undue use. The Company pays particular attention to the implementation of the provisions on protection and protection of personal data provided for by national legislation e supranational, committing itself to adopt and implement, if these concern sectors of interest, the guidelines drawn up by the Data Protection Authority Personal. In particular, it is not allowed, either directly or indirectly:

- a) disclose company information to others, including other employees, unless they do not have a legitimate need for it because of their work and, if not are employees, have agreed to keep them confidential;
- b) use company information for any purpose other than that for which they are destined;
- c) obtain and / or procure copies of documents containing company information o remove documents or other archived material or copies thereof from workstations, except in cases where this is necessary to perform specific and expressly authorized tasks;

d) improperly destroy company information.

All business documents, e-mails and other materials containing company information, as well as all materials drawn up with the use of these documents, are owned by the Company and must be returned to the Company at the request of the same or at the end of the employment relationship. Documentation that does not need to be kept must be destroyed in accordance with company policies and, if it contains personal data, in compliance with current regulations on the processing of personal data.

### 3.7. PRODUCT QUALITY PROTECTION.

The Company undertakes to guarantee the quality of the products manufactured and marketed through:

- a careful selection of raw materials and their suppliers;
- precise management of production processes, regulated by means of definitions procedures, prepared on the basis of current environmental regulations;
- constant control of all operational processes aimed at obtaining the finished product implemented by the proposed company functions, in compliance with all legal requirements and related sector regulations.

### 3.8. ENVIRONMENT.

Aware of its responsibility towards the present generations e future, the Company inspires its activities on the principle of safeguarding the environment e of the resources it offers and pursues the goal of protecting safety and health of all those who, for various reasons, are interested in the business activities to come managed in full compliance with current national and community legislation on prevention and protection. It meets the community's expectations regarding environmental issues, assuming every suitable instrument of protection and caution and condemning any form of damage and impairment of the eco-system. Research and technological innovation must be dedicated in particular to creation and promotion of increasingly compatible systems, products and processes with the environment and characterized by increasing attention to safety and health of all those who come, for whatever reason, into contact with the activities of the Society.

The Company, in accordance with the mission of “creating value by consolidating values”, sets itself up the goal of raising awareness and training its Employees and Recipients in general to promotion and application of environmental rules. The initiatives of Employees and Recipients who aim at exemplary behavior in compliance of the environment are encouraged and supported.

### 3.9. JOB SECURITY.

The Company is scrupulous in respecting the current safety regulations of the work and, in particular, those contained in the legislative decree 9 April 2008, n. 81 and following edits.

Therefore, it carries out constant monitoring of its own systems and of its own equipment, wherever located and functioning, beyond the legal obligations and the protection of imminent risks, to ensure maximum safety and quality of its services.

The Employees and Collaborators of the Company ensure maximum availability in against the Manager or anyone who comes to carry out inspections and checks for account of the Authorities in charge.

If one of the Recipients finds anomalies or irregularities in the matter, he must promptly inform the head of the prevention and protection service risks, the head of the company function to which he belongs and the head of human resources . The principles operating in the field of health and safety at work are better specified, hereinafter in the Code, in specific provisions.

### 3.10. FAIRNESS AND TRANSPARENCY IN ACCOUNTING MATTERS.

The Company undertakes to behave correctly, transparently and collaboratively, in compliance with the law and company procedures, in all activities aimed at preparing the financial statements and other corporate communications, in order to provide shareholders and third parties with true and correct information on the situation economic, equity and financial position of the company.

It also ensures the regular functioning of the Company and the corporate bodies, guaranteeing and facilitating any form of control over the company management envisaged by the law as well as the free and correct formation of the shareholders' will.

It also undertakes to carry out all the information promptly, correctly and in good faith communications required by law and regulations to the supervisory authorities, not placing any obstacles in the way of the exercise of the functions to be these exercised.

During the inspection activity possibly undergone, the Company undertakes to offer the maximum collaboration in carrying out the investigations, making available with timeliness and completeness the documents, the acquisition of which is deemed necessary.

The Company proceeds to carry out the distribution of profits or advances on the same, the reduction or increase in share capital, mergers or demergers, in compliance with the current legislation.

#### 4. RULES OF CONDUCT RELATING TO STAFF

##### 4.1. STAFF SELECTION AND FORMALIZATION OF THE RELATIONSHIP OF WORK.

The Company respects the principle of equality and equal opportunities in the phases of selection and recruitment of personnel, basing their choices exclusively on skills and abilities of candidates. As part of the selection process comes rejected any form of favoritism, nepotism or patronage and are used objective and commonly shared evaluation criteria. Where the selected person has ties of kinship, affinity, friendship / acquaintance, or interests attributable to Recipients, these will be required to inform the collegial bodies of the Company first to proceed with a proposal for insertion and wait for their clearance. The information requested from candidates during the selection process is only that which is necessary to verify the aspects foreseen by the personal profile, in full respect of life private of the candidate.

The Company is committed to the utmost cooperation and transparency towards new hires: all information relating to the employment relationship is presented to candidate so that his acceptance of the assignment is based on an understanding effective of all its contents.

#### 4.2. PERSONNEL MANAGEMENT.

Access to roles and positions is established solely in consideration of skills and abilities. Each department manager can and must request only from his own collaborators performance consistent with the performance of one's duties and needs organizational and production of the Company.

The working week must not exceed the maximum duration allowed by the forecasts applicable law. Overtime work, in general, will be contained within the limits of the CCNL and the law.

#### 4.3. PROVISIONS CONCERNING ILLEGAL IMMIGRATION AND CONTRAST TO THE EXPLOITATION OF LABOR.

The Company undertakes, in compliance with the relevant regulatory provisions, not to establish any employment relationship with subjects without a residence permit or not carry out any activity aimed at favoring the illegal entry, in Italy, of clandestine subjects.

The Company bans all forms of labor exploitation. In particular, it prohibits the use, hiring or employment of manpower, including through activities of intermediation, subjecting workers to conditions of exploitation and taking advantage of their state of need.

It undertakes to scrupulously comply with the regulations in force on the subject of remuneration and working hours, committing to:

- pay a salary proportionate to the quantity and quality of the work e compliant with the provisions of national or territorial collective bargaining;
- ensure compliance with working hours, regulating the performance of the so-called overtime, of the rest period, including weekly, of compulsory leave and of holidays;
- to guarantee decent working conditions, even excluding methods of surveillance not permitted by law or in any case harmful to the personality of the individual e not functional to satisfy objective and recognized needs.

#### 4.4. PROTECTION OF THE EMPLOYEE WHO REPORTS ILLEGAL.

The Company undertakes to protect its employees and / or collaborators who report to the Supervisory Body possibly established or, failing that, to the bodies of governance or to the Head of Human Resources (HR), in the ways and in the cases provided for by law no. 179, relevant illegal conduct pursuant to legislative decree 8 June 2001, n. 231, or submit complaints or deeds of complaint-complaint, however denominated, to the Judicial Authority or to any other Authority than this one is obliged to report for the same conduct, ensuring that they go exempt from any kind of negative consequence such as, for example, sanctions, dismissals, downsizing or other organizational measure with direct or indirect negative effects on the working conditions that are a consequence of said report as well as to protect them from any discriminatory or retaliatory acts of any nature connected to this.

The Company undertakes, also by creating appropriate information channels, to protect the confidentiality of the whistleblower and the content of the information, insofar as such confidentiality is permitted by law and for as long as the confidentiality is no longer valid is functional to allow the person to whom such reports refer to be able to excuse.

#### 4.5. USE OF RESOURCES.

All Recipients are responsible for the appropriate use and safeguarding of the corporate assets entrusted to them and they undertake to use it only in the interest of the Company. The company assets also include documents, work tools, systems and equipment and all other tangible and intangible assets (including intellectual property and trademarks), technologies in use, strategies and projects for the product development, business strategies and plans, customer lists, data relating to personnel, marketing and sales programs, telephone directories company, organizational charts, data relating to the cost of products, pricing policies of products, financial and accounting data and any other information relating to the activity, customers and employees of the Company.

For the purposes of the safety of company assets and guarantees of continuity of work, the Company applies access control systems to structures and systems informative. No employee will be able to use the computer equipment available, including computer networks and their own company e-mail inbox, on the contrary to the law or in a manner that may cause damage to the Company's reputation, or in in such a way as to compromise the efficiency and effectiveness of the activities or safety of the Company or third party systems.

## 5. RULES OF CONDUCT TOWARDS THIRD PARTIES.

### 5.1. CRITERIA OF CONDUCT TOWARDS SUPPLIERS.

The selection of suppliers and subjects with whom to establish business relationships in general must take place on the basis of objective criteria, such as quality and price of the marketed asset, the guarantees of timeliness and efficiency in provision of a service, seriousness and proven ability. In the supply and commercial relationships in general, the Company undertakes:

- a) to observe the internal procedures for the selection and management of relations with suppliers, as well as, in general, in the selection of subjects with whom to entertain business relations;
- b) not to preclude any supplier company or any interested party to entertain commercial relations if in possession of the required requisites, the possibility of competing for a supply or the stipulation of a contract with the Company, adopting evaluation criteria in the selection objective, according to declared and transparent methods;
- c) to obtain the collaboration of the suppliers and of the subjects with whom it has commercial relationships in constantly ensuring the meeting of the needs of the Company's customers in terms of quality, cost and delivery times, to an extent at least equal to their expectations;
- d) to maintain a frank and open dialogue with suppliers and with the subjects with whom commercial relations are maintained, in line with good commercial customs.

### 5.2. PAYMENTS.

Any payment required for a product or service must be made directly to the Company and not to a single individual and must be duly recorded in the appropriate accounting books by the company function in charge of this. Likewise, any payment will be made by the Company, in compliance with the company procedures, only upon receipt of the required accounting and / or tax documentation, and only where it is attributable to the Company's business.

### 5.3. COINS, BANKNOTES AND STAMPED VALUES.

Any persons in charge of managing money and revenue stamps who work on behalf of the Companies, must carry out the control of the coins, banknotes and stamps processed e provide for the immediate withdrawal from circulation of the same, in case of ascertained or even if only suspected falsehood.

In the event of receipt of coins, banknotes or values deemed to be counterfeit or altered, the Directors must be informed immediately so that they can proceed with the appropriate reports.

### 5.4. MANAGEMENT OF MONEY, GOODS OR OTHER UTILITIES.

It is absolutely forbidden to entertain economic and financial transactions involve the replacement or transfer of money, goods or other utilities coming from crime; or carry out, in relation to them, other operations, in such a way as to hinder the identification of their criminal origin. It is also forbidden to use the aforementioned assets in economic or financial activities.

### 5.5. RELATIONS WITH SHAREHOLDERS.

The relations of the Company with the shareholders are maintained by each Director and each Employee, whatever the function or position, or, if of case, by each Collaborator, in compliance with current legislation and on the basis of general principles of fairness and loyalty.

### 5.6. PUBLIC FINANCING.

In the event that the Company can benefit from financing of any kind, provided by national and / or supranational public entities, it prohibits and contrasts any artifice or deception (also through false declarations or omissions) put in place by a own component and by any means to obtain, unduly, such loans, grants or provisions paid by the public administration or by the body that distributes it, or to divert its restricted destination.



Recipients are expressly prohibited from promising gifts, money or other benefits to competent judicial authorities or whoever physically carries out the aforementioned inspections e checks, in order to undermine their objectivity of judgment in the interest of Society. It is also forbidden to exert pressure of any kind on the person called to make statements before the judicial authorities or other administrative bodies, in order to induce you not to make statements or to make false statements.

It is forbidden to help anyone who has committed a criminal offense to evade investigations by the authority or to evade the research of this. In any case, relations with the Public Administration must always be based on the utmost correctness, loyalty and transparency. The Company does not accept in any way that the pursuit of its objectives takes place through corrupt practices or in any case contrary to the law.

## 6. RULES OF CONDUCT REGARDING HEALTH AND SAFETY IN WORKPLACES.

### 6.1. PURPOSE.

The Company considers the protection of safety in the workplace an absolute value, from preserve and defend by any means technically possible, making use of tools and / or knowledge provided by the science and experience of the moment, including not only life and physical integrity, but also other aspects fundamentals of personality (for example, the dignity of the worker).

Safety in the workplace is therefore the primary objective that the Company intends to achieve and, for this purpose, it shares, acknowledges and adopts the principles and indications contained in the Directive of the Council of the European Communities of 12 June 1989, n. 89/391 / EEC.

In particular, the Company undertakes to guarantee the safety and health of workers in all the aspects connected with the work, obliging itself to do so even in the event that make use of skills (services and external people) of the company and plants. The Company will therefore make the entire company organization responsible, so that everyone, in his role and taking into account his own duties and responsibilities, provide the necessary contribution to the achievement of the set objectives.

## 6.2. OBLIGATIONS OF THE EMPLOYER REGARDING THE ASSESSMENT OF RISKS AND PREPARATION OF SUITABLE SECURITY MEASURES.

The Company, through the person designated as the Employer, undertakes:

- a) to adopt the necessary measures for the protection of safety and health of workers, including professional risk prevention activities, information and training, as well as the preparation of an organization e the necessary means;
- b) to constantly update these measures, to take into account changes in circumstances and aim at improving existing situations.

The Employer implements the above measures based on the following general principles prevention:

- a) avoid risks;
- b) assess the risks that cannot be avoided;
- c) combat risks at source;
- d) to adapt work to man, in particular as regards the conception of jobs and the choice of work equipment and methods of work and production, with the aim of alleviating monotonous work and repetitive work e to reduce the effects of these works on health;
- e) take into account the degree of technical evolution;
- f) replace what is dangerous with what is not or less dangerous;
- g) planning prevention, aiming at a coherent complex that integrates in the same technique, work organization, working conditions, social relations and the influence of factors of the work environment;
- h) individual protection;
- i) give adequate instructions to workers.

Furthermore, the Employer, taking into account the nature of the business activities and / or of the establishment, it undertakes:

- a) to assess the risks for the safety and health of workers, including in their choice work equipment and chemical substances or products and / or preparations e in the arrangement of workplaces. Following this evaluation, what if necessary, the prevention activities, the working and production methods adopted by the employer must: ensure a better level of protection of the health and safety of workers; be integrated into the complex of business and / or plant activities at all hierarchical levels;
- b) when entrusting tasks to a worker, take into account the skills of the same in matters of safety and health;

- c) ensure that programming and the introduction of new technologies form subject to consultations with workers and / or their representatives, as far as concerns the consequences on the safety and health of workers associated with the choice of equipment, the reorganization of working conditions e the impact of factors in the working environment;
- d) arrange appropriate measures so that only the workers who have received adequate instructions can access the areas that have a serious and specific risk.

In the event that the workers of several companies are present in the same workplace, the Company undertakes to cooperate with other Employers, so that:

- a) the provisions relating to safety, hygiene and health;
- b) the means of protection and risk prevention methods are coordinated professional;
- c) there is complete information (both from the Employers and the workers involved) about the risks that characterize the performance of the work activity. Measures relating to safety, hygiene and health at work must not in any case involve financial burdens for workers.

### 6.3. THE PROTECTION AND PREVENTION SERVICE: OBLIGATIONS OF THE EMPLOYER OF WORK AND OF THE BELONGING TO THE PREVENTION SERVICE E PROTECTION.

Without prejudice to the obligations regarding risk assessment and the preparation of related security measures, the Employer undertakes to designate one or more workers, who deal with risk protection and prevention activities professional. The workers designated, in order to fulfill the obligations under this Directive, they must be given adequate time. In any case:

- a) designated workers must possess the necessary skills and make use of means required;
- b) the number of designated workers and external persons or services consulted it must be sufficient to carry out the protection and prevention activities, taking into account the size of the company and / or the establishment and / or the risks workers are exposed to, as well as the risk sharing as a whole company and / or factory.

#### 6.4. OBLIGATIONS RELATING TO FIRST AID, FIRE FIGHTING, EVACUATION OF WORKERS AND SERIOUS AND IMMEDIATE DANGER.

The Company, in the person of the Employer, undertakes:

- a) to adopt, in the field of First Aid, fire fighting and evacuation of workers, the necessary measures, appropriate to the nature of the activities and to the size of the company and / or establishment, taking into account other people present;
- b) to organize the necessary relationships with external services, in particular with regard to First aid, emergency medical assistance, rescue and fire fighting.

The Company, in the person of the Employer or a delegate, must in particular designate for first aid, for fire fighting and for the evacuation of workers, the subjects in charge of applying these measures. These workers must be trained, be in sufficient numbers and have equipment adequate, taking into account the size and / or specific risks of the company and / or specific production unit.

The Company must:

- a) inform, as soon as possible, all workers who are or who may be exposed to the risk of a serious and immediate danger about the risk itself and the provisions made or to be taken on protection matters;
- b) give instructions and arrange safeguards so that workers can, in case of serious, immediate and cannot be avoided danger, cease their activity and / or get to safety, leaving the workplace immediately;
- c) except for duly justified exceptions, refrain from asking workers to resume their activities in a work situation in which danger persists serious and immediate.

The worker who, in the event of serious danger, is immediate and cannot be otherwise avoided or contained, leave the workplace and / or a dangerous area, do not may suffer any prejudice for this behavior, nor blamed for the conduct put in place.

## 6.5. ADDITIONAL OBLIGATIONS OF THE EMPLOYER.

The Company also undertakes:

- a) to carry out an assessment of the risks to safety and health during work, including risks concerning groups of workers exposed to particular risks;
- b) to establish the protective measures to be taken and, if necessary, the equipment of protection to use;
- c) keep a list of accidents at work;
- d) draw up, for the competent authority and in accordance with legislation and / or practices national reports on accidents at work suffered by their own workers.

## 6.6. INFORMATION ACTIVITIES FOR WORKERS.

The Company ensures that the workers and / or their representatives in the company and / or in the plant or in the single production unit receive all the information necessary regarding:

- a) the risks to safety and health, as well as protective measures and activities e prevention concerning both the company and / or the establishment in general and each type of job and / or function;
- b) the measures taken in application of the employer's obligations in relation to the first aid, fire fighting and evacuation of workers.

The Company undertakes to ensure that the Employers of the workers of the companies and / or of the external establishments, which intervene in your company or factory, receive adequate information, intended for the workers in question, on the points of referred to in the previous paragraph.

The Company ensures that the employees or employee representatives owning a specific function regarding the protection of the safety and health of workers have access, for the performance of their functions:

- a) risk assessment and safety and health protection measures during work;
- b) the list and reports on accidents at work;
- c) information from protection and prevention activities and from inspection services and competent bodies for safety and health.

## 6.7. FUNCTIONAL OBLIGATIONS TO CONSULTATION AND PARTICIPATION OF WORKERS.

The Company undertakes to consult the workers and / or their representatives and to allow the participation of workers and / or their representatives in all matters that they concern safety and health protection at work, this implies both consultation of workers, both the right of workers and / or their representatives of formalize proposals.

Workers or workers' representatives holding a specific function in the matter prevention of safety and health of workers participate in a manner balanced and are consulted in advance and promptly by the employer:

- a) on any action that may have significant effects on safety and on health;
- b) on the designation of the workers assigned to the prevention service e protection and of those who have to take care of the emergency room, of the fight firefighters and in charge of managing the evacuation of workers;
- c) on information to workers on workplace safety;
- d) on the possible use of skills (people or services) external to the company and / or to the factory;
- e) on the conception and organization of adequate training in the field of health and safety in the workplace.

The workers' representatives, holders of a specific function in the field of protection safety and health of workers, have the right to ask the employer to work to take appropriate measures and to submit proposals to this effect in order to contain any risk for workers and / or to eliminate the causes of danger.

Workers and workers' representatives cannot be harmed by respective activities contemplated by this Code. The Company undertakes to grant a sufficient exemption from work, without loss of remuneration, to the representatives of the workers holding a specific function on the matter to protect the safety and health of workers, and to place them provide the means necessary to exercise the rights and functions that concern them. Employee representatives must have the opportunity to present their own observations during the visits and checks carried out by the competent authority.

## 6.8. FUNCTIONAL OBLIGATIONS TO THE TRAINING OF WORKERS.

The Company undertakes to ensure sufficient training for each worker e adequate in terms of safety and health, in the form of information and instructions, on occasion:

- a) of the recruitment;
- b) a transfer or change of function;
- c) the introduction or change of work equipment;
- d) the introduction of a new technology, specifically focused on its own workplace or function.

This training must be adequate for the evolution of risks and the onset of new risks and, if necessary, periodically repeated. The Company undertakes, in order to ensure that the workers of the companies and / or of external establishments, which intervene in your company and / or in yours establishment, have received adequate instructions about the safety and security risks health during their activity in your company or establishment.

The representatives of the workers holding a specific protection function safety and health of workers have the right to adequate training. The training will take place during the working time and cannot be charged to the workers, nor their representatives.

## 6.9. OBLIGATIONS OF WORKERS.

It is the obligation of each Recipient to carry out their work on behalf of itself, or in any case frequent the workplaces of the Company itself, take reasonably care for their own safety and health as well as those of other people who may be affected by the effects of his / her actions or omissions on work, in accordance with his training and the instructions given by the employer work.

In order to achieve these objectives, workers must, in particular, comply their training and the instructions provided:

- a) correctly use the machinery, equipment, tools, dangerous substances, transport equipment and other means;
- b) correctly use the personal protective equipment placed on them arrangement and, after use, put it back in its place;

- c) not to put out of service, neutralize, change or arbitrarily move i own safety devices, in particular, of the machinery, of the equipment, tools, systems and buildings and use them safety devices correctly;
- d) immediately report to the employer and / or workers that they have a specific function regarding the protection of the safety and health of workers any employment situation that, for reasonable reasons, they believe it could constitute a serious and immediate danger to safety and security health, as well as any defect detected in the protection systems;
- e) allow the workers holding a specific function regarding the protection of the safety and health of workers to carry out, for the necessary time, of all duties or the fulfillment of all obligations imposed by the competent Authority in order to protect the safety and health of workers at work;
- f) contribute, together with the Employer and / or workers who have a function specific for the protection of the safety and health of workers, a make the environment and the conditions in which they perform as safe as possible your work activity.

#### 6.10. SECURITY OF INFORMATION SYSTEMS

The Company, in carrying out its business activities, uses tools and i IT and telematic services in full compliance with the relevant regulations, the contractual provisions and internal policies and procedures.

#### 6.11. RESPECT FOR INDUSTRIAL AND INTELLECTUAL PROPERTY

The Company, in carrying out its business activities, guarantees the constant e punctual compliance with legitimate industrial and intellectual property rights to third parties, as well as the laws, regulations and conventions to protect these rights. In in particular, it is mandatory for employees and collaborators, in the exercise of their own activities, to refrain from any conduct that could constitute usurpation of securities of industrial or intellectual property of third parties.



#### 6.12. EFFICIENCY

The principle of efficiency requires that it be carried out in every work activity the cost-effectiveness of the management of the resources used in the provision of services and is assumed the commitment to offer an adequate service with respect to customer needs and according to the most advanced standards.

#### 6.13. SPIRIT OF SERVICE

The principle of the spirit of service implies that each Recipient of the Code is always oriented, in their behavior, to sharing the corporate mission aimed at providing a service of high social value and usefulness to the community, which must benefit from the best quality standards.

#### 6.14. DECOROUS BEHAVIOR

As part of the duties and tasks assigned, any person who works for account of the Company, must maintain a decent and respectful behavior the sensitivity of others and the image of the Company. Therefore, i behaviors that can damage the reputation of the Company towards its interlocutors.

#### 6.15. ABUSE OF THE POSITION OF AUTHORITY

The Human Resources function, within the limits of possible information, adopts appropriate measures to avoid favoritism, nepotism or forms of clientelism both in the phases of selection and hiring and in the management of employment relationships.

It is an abuse of the position of authority to request, as an act due to the superior hierarchical, performance, personal favors, or any behavior that sets one up violation of this Code of Ethics. Corporate officers and other persons or entities with the objective possibility of influencing corporate decisions must absolutely avoid using, even if only implicitly and indirectly, its position to influence decisions relating to the hiring of personal in favor of relatives, friends and acquaintances, for personal purposes of any nature they are and with discriminatory criteria.

In the case of work reorganization, the value of human resources is safeguarded, providing, where necessary, training and / or professional retraining actions, ensuring, where possible, that the burdens deriving from the reorganization of the work are distributed as evenly as possible among all employees, consistently with the effective and efficient exercise of the business activity.

Employees who believe they have suffered discrimination can report the incident to the own manager who will proceed to ascertain the actual violation of the Code. The recruitment of staff takes place on the basis of regular employment contracts, not any form of non-compliant or otherwise working relationship is allowed elusive of the provisions in force.

## 7. PENALTY REGIME.

### 7.1. EMPLOYEES AND DIRECTORS.

Compliance with the rules of the Code must be considered an essential part of the Contractual obligations of employees, pursuant to and for the purposes of article 2104 of Civil Code. The obligations of the code may be the default of the primary of the employment relationship or disciplinary offense, in compliance with the procedures set out in the law in force and in particular by the Workers' Statute, with all legal consequences, also with regard to the preservation of the employment relationship, being able in any case and in any case entail compensation for the damages deriving from them.

In the event of the adoption of an Organization and Management Model («OMM») drawn up in Compliance with the provisions of the legislative decree 8 June 2001, n. 231, will be also subject to disciplinary power for directors who are not employees, i which will be obliged to submit to the sanctioning power of the Company, exercised in a manner and in the presence of the conditions envisaged by the OMM. The sanctions, also against the Directors, must satisfy the needs of effectiveness, proportion and prevention.

## 7.2. THIRD PARTIES.

The Code can be considered an essential part of the obligations contracts assumed by Collaborators and / or by subjects having business relations with Companies where contractual clauses are expressly provided for in this sense. Violation of the rules of the Code may include in the fulfillment of obligations contractual, with all legal consequences, also with regard to the resolution of the contract and / or the assignment and may result in compensation for damages from the same arising.

To this end, as far as possible, the Company will endeavor to bind the Collaborators and / or the third parties who have business relations with it, also with respect to existing relationships, in compliance with the provisions of the Code, taking care to disseminate knowledge thereof.

## 7.3. DISCIPLINARY SANCTIONS FOR UNFOUNDED REPORTS.

The Company, Fat Salve the further legal consequences and criminal and civil actions undertaken by the successors in title, undertakes to sanction from a disciplinary point of view reports that are unfounded and that occur with willful misconduct or gross negligence.

## 8. FINAL PROVISIONS AND ENTRY INTO FORCE.

This Code, which recognizes the Company's practices, is approved by the Board of administration and will be in force, for each of the Recipients, after 10 (ten) days from the delivery of a copy of the same. Any variation and / or integration of the same will also be approved by the Board of administration and promptly disseminated to the Recipients.