



FI.MO.TEC. S.p.A.
Code of Ethics

1st Edition - Approved by the Board of Directors March 30, 2016

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1. PREMISE

FI.MO.TEC. S.p.A. (from here forward referred to as ‘The Company’) is a company which operates within the market of fastening systems and participates with its own registered brand FIMO (trademarked), one of the major global players of production lines of cable clamps for broadcasting and mobile network installation specialists.

The Board of Directors of the Company believe that defining the values and principles which guide FI.MO.TEC. is of great importance and that all business carried out is done in such a manner that respects the rules laid out in this code, ensuring fair competition, honesty, integrity and good faith and respecting the interests of all stakeholders associated with the Company.

FI.MO.TEC. S.p.A. Board of Directors has therefore adopted this most recent edition of the Code of Ethics, approved March 30, 2016, thus formalising the Company’s fundamental ethical principles and upholding the belief that there can be no dissociation of ethical conduct or respect for the law in doing business.

2. RECIPIENTS

The principles of this code and its conduct must be respected as a guide by all Employees, Administrators, Unions, Agents, Distributors and *Partners*, Consultants, Suppliers and Collaborators; any person operating in the name of or on behalf of the Company nationally or internationally (the “Recipients”)

Observance of the Code of Ethics is part of the contractual obligation of Employees: violation of the code by wrongful act (punishable according to the applicable regulations) and/or breach of contract could result in possible liability for damages sustained by the Company.

3. GENERAL PRINCIPLES

Recipients of this Code must recognise and respect the personal dignity, private sphere and personal rights of each and every individual.

There is zero tolerance of any form of discrimination when conducting business.

In all cases of selection, Employees must assess and verify the reliability and integrity of consultants, agents, suppliers, distributors, collaborators and *Partners*, related to this Code of Ethics.

Relationships with Recipients coming from other entities, public or private, must be established and managed respecting the values of honesty, integrity, fairness, transparency, moral integrity and good faith.

3.1. Legal Compliance

The Company operates within a multinational context and for this reason, requires that all Employees respect the laws and regulations which govern the countries in which work is being carried out.

Employees must carry out duties with maximum transparency and absolute respect for the laws and regulations in effect in the place and time in which they are working.

Each Employee must commit to having the best understanding possible of the rules related to his/her job and be accountable for violations of them.

Every Department of the Company must do its utmost to be as aware as possible of the rights associated with it, the rights laid out by the regulations of laws, contracts and relationships with Public Administration and must not behave in any way that may be damaging.

3.2. Countering Corruption

Operating honestly, with integrity, fairness and transparency within the limits of the law and what is internationally customary, are considered cornerstones of the Company.

Since the Company's operations extend beyond national borders, it is asked that Recipients strictly observe, both domestically and internationally, all regulations in the fight against corruption whether in the public or private sector. In no way is it justifiable to act in the interests of or to gain advantage for the Company, violating the rules and regulations of anti-corruption laws.

It is never permitted to directly or indirectly communicate or offer gifts, payments, material benefits and other advantages or benefits to third parties, public officials (including foreign officials), public service providers, or regional entities, public or private sector employees to influence acts performed by their offices, not even in places where corruption is customary or a tolerated norm.

Prohibited conduct includes offering or receiving on behalf of Company personnel, or on behalf of anyone related to the Company and for whom business could be economically advantageous or beneficial. Acts of favour are only permitted if they are outlined in the rules and insofar as they are of modest value or of a value that in no way compromises the integrity or reputation of one of the parties and can not be interpreted as a way of gaining advantage in an improper way.

3.3. Conflict of interest

All required to follow this Code of Ethics must avoid any and all situation which may create a conflict of interest for the Company. Information gained while doing one's job must remain strictly confidential and must not be shared unless permitted by the regulations in effect.

The following examples are situations of conflict of interest:

- Use of one's own position in the Company, or of information acquired while doing one's job in a way that creates a conflict between personal interests and those of the Company and results in a personal economic advantage;
- Accepting money, favours from people and/or entities which intend to enter into economic agreements with the Company;
- Businesses which could interfere with a person's ability to make impartial decisions in safeguarding the best interests of the Company. Included are cases in which the business owner of the conflicted interest is not the direct administrator, but the administrator's spouse, family member or relative;
- Profit sharing (explicit or hidden) in the businesses of suppliers, clients or competitors.

3.4. Countering organised crime and terrorism

The Company abstains from dealings of any kind, either indirectly or through intermediaries, with natural or legal persons that are known to belong or suspected of belonging to a criminal organisation of any kind, including those associated with the mafia, human trafficking and child labour, or with persons or groups that operate with the purpose of terrorism, such to consider conduct that could cause serious damage to a country or an international institution with the aim of intimidating the population, forcing public authorities or an international institution to carry out or refrain from carrying out any act, or destabilising

or destroying a country or international institution's fundamental political, constitutional, economic and social structures.

While carrying out one's duties, should Recipients become aware of acts or behaviours which could constitute illegal activity of any kind linked to organised crime or terrorist networks as aforementioned, they must immediately notify the Supervisory Body or Managing Director.

3.5. Protection of trademarks, patents and intellectual property

The Company expressly prohibits any type of alteration, infringement or misuse of trademarks or brands, whether the design is for the domestic or foreign market.

The Company also condemns any unauthorised use of trademarks or distinctive marks, altered or counterfeited, within the Italian territory or any other state in which the Company operates. It also prohibits the marketing of products with trademarks or distinctive marks which display misleading information as to origin, source, or quality of the product.

Similarly, the Company prohibits manufacturing, marketing, distribution or use of simple objects and goods made by encroaching upon or violating industrial property rights.

The protection of intellectual property is considered of paramount importance and therefore any illegal infringement, unauthorized distribution, reproduction, use, sale, for whatever reasons or use and with whatever means is strictly forbidden.

3.6. Compliance with Antitrust law

The Company believes in free and loyal competition and focuses its actions on achieving competitive results that reward capability, experience and efficiency.

Arrangements of cooperation between companies, or being aware of other forms of coordination which have as their object or effect the prevention, restriction or distortion of competition are prohibited.

The adoption of marketing strategies which lead to the abuse of one's 'leading role', giving way to economic conditions enabling the Company to operate as a hegemony within the market, thus hindering free competition is also prohibited.

In no way will the pursuit of Company interests ever justify top management or collaborators disrespecting domestic or international laws or non-compliance with this Code.

The Company is also committed to not impeding inspections conducted by Antitrust Authorities, fully cooperating with and providing clear, transparent and accurate information to them.

All foreign correspondence, information regarding the Company and its business must be accurate, truthful, clear and verifiable.

3.7. Reserved information

It is absolutely prohibited to divulge to third parties confidential information which is not public knowledge regarding projects, acquisitions, mergers, marketing strategies, industrial processes, know-how, industrial secrets and in general, it is prohibited to disclose information to which they have gained access, as well as advise third parties on the basis of the same access in the execution of any type of operation within the financial market.

It is prohibited to buy, sell or carry out financial or business operations, even for personal reasons for the purposes of gaining advantage if the operations are based on or fostered by the possession of confidential information or any information Recipients have become aware of due to their tasks within the Company.

In addition, the Recipients mustn't divulge information about the Company which is not public knowledge or which could cause prejudice to the interests of the Company.

3.8. Respecting Privacy

Recipients must treat personal data with the utmost respect for *privacy* according to the following directives issued to them by the appropriate and qualified Company representatives.

Personal data, subject only to the Recipients charged with their treatment, must be:

- Treated legally and fairly;
- Gathered and recorded for specific and explicit reasons which are legitimate and to be used in other operations where the treatment of data is not incompatible with the reasons;
- Accurate and kept up to date;
- Pertinent, complete and not excessive in relation to the final purpose for which it was gathered and then treated;
- Saved in a form that allows for the identification of the subject for a period of time no longer than necessary for the purposes for which they were collected and subsequently processed.

The Recipients charged with this responsibility must adopt all appropriate measures and avoid risks of damage or loss, also accidental, of the personal documents, of unauthorised access to them or treatment of them which does not comply with the purposes for which the data was gathered. Those purposes are detailed and periodically updated within the context of the Company.

4. HUMAN RESOURCES

4.1. Safeguarding human resources and selection

The Company recognises, protects and promotes the value of human resources which are fundamental and irreplaceable factors for Company success and development of skills.

To this end, the Company is committed to creating, maintaining and protecting all the conditions needed to ensure the advancement of employees' skills, expertise and knowledge, in order to achieve corporate goals.

FI.MO.TEC. places great importance on the physical well-being and morale of its collaborators, guaranteeing work conditions respectful of individuals' dignity and a healthy and safe workplace. Requests or threats which cause the resources to act unlawfully, or violate this Code of Ethics and/or individual preferences or beliefs will not be tolerated. As well, any form of influencing statements to be handed over to Judicial Authorities will not be tolerated.

All Employees shall be treated with rigorous respect of the principles and the values outlined in this section within an atmosphere which favours communication and cooperation among employees and mutual respect and fairness between them and their superiors.

The Company endorses a policy of employee recognition and merit bonus awards and is committed to providing equal opportunities without discriminating on the basis of sex, race or ethnicity, nationality, age, political opinion, religious belief, health, sexuality, or socio-economic conditions.

Employee dedication and professionalism are fundamental elements in the Company's aim in achieving its goals. For this reason, the Company is committed to developing the skills, capabilities and talent of each employee, following a merit-based and equal opportunity policy.

Every Employee should aim to build a workplace that is stimulating and gratifying, thus favouring the potential of each worker.

4.2. Hiring of staff and compensation

The selection, ranking and career path of staff relate, without discrimination, exclusively and objectively to personal and professional characteristics necessary to carry out a job effectively.

Employment is regulated by collective bargaining and welfare, tax and insurance regulations. Personnel are taken on with legal employment contracts.

No form of illegal employment, child labour or exploitation shall be tolerated.

It being understood that mandatory rules must be followed, the remuneration system at any level, whether valued in money or in *benefits*, must always be based on only the principles of objective assessment concerning school training, specific professionalism, experience acquired, demonstrated merit and achievement of the objectives assigned.

Salary increases, procurement of other benefits or career advancement based on illegal activities, and activities which do not comply with Company procedures, this Code and other internal rules and regulations are strictly forbidden.

4.3. Obligations of Staff and Recipients

Loyalty, ability, professionalism, reliability, preparedness and dedication of staff represents the values and conditions which are the foundation of achievement of the Company objectives.

Employees, consultants and business partners of the Company are required to cultivate and encourage the leverage of new skills, abilities and knowledge, as well as to operate, when conducting its business, in full compliance with organizational structures.

The Recipients must take respect for a person, their dignity and value, into constant consideration. Any form of discrimination on the bases of sex, racial or ethnic origin, nationality, age, political opinion, religious belief, health, sexuality and socio-economic status is prohibited.

The Company rejects and condemns any behaviour that could be interpreted as sexual harassment or other forms of discrimination within the workplace or in trade relations.

To this end, the Company is committed to creating a workplace that is free of prejudice and any form of intimidation, but that respects the dignity of its people.

Employees are responsible for maintaining this professional climate of mutual respect, ensuring each person feels accepted and encouraged in the achievement of his/her objectives.

4.4. Alcoholic substances, illegal drugs and smoking

The Company asks that each Employee contribute to maintaining an environment characterised by decorum and sobriety.

The use of drugs or any substance that could create a psycho-physical imbalance is strictly forbidden.

Smoking is also strictly prohibited anywhere within the workplace other than the specifically designated areas. Anyone experiencing second-hand smoke due to these areas must inform his/her Supervisor.

4.5. Use of Company Assets

The use of company assets, save for the ones expressly assigned as Company *benefits* for Employees, which are not for personal use, is forbidden.

It is forbidden to use company assets and, in particular, information and networking resources for purposes contrary to the law, public order or morality, or to commit or induce the committing of an offence, or to promote racial hatred, the glorification of violence or the violation of human rights.

Employees are personally responsible for protecting the Company's assets by preventing the fraudulent or improper use of them, including allowing colleagues to use a personal ID and passwords to access information systems. In addition, the Employees must comply with all internal policies in accordance with information technology (IT) sector regulations.

The use of Company assets must be directly related to the carrying out of one's duties or within the limits set and authorised by the employee in charge of them. It is strictly forbidden to use the Company's IT resources for consultation, access or any form of activity related to media featuring child pornography.

It is prohibited for any Recipient to record or reproduce audiovisual, electronic, photocopied or photographed company documents, except for cases in which these actions are part of one's assigned duties.

It is expressly forbidden to engage in conduct, that could in any way impair, alter damage or destroy computer or telecommunications systems, computer data and programs belonging to the Company or third parties.

5. RELATIONSHIPS WITH THIRD PARTIES

5.1. Donations, gifts and sponsorships

Donations of modest value directly attributed to normal courtesy relations are permitted.

The aforementioned donations must, however, not create - in the other party or in a third and impartial party - the impression that the donations are aimed to gain or grant undue advantage or generate an impression of illegality or immorality. Any and all donations must be appropriately documented.

Recipients are prohibited from soliciting the offering or concession, or the acceptance or receipt of benefits of any kind, even those of low value.

In the case that a Recipient receives gifts or special treatment that cannot be directly attributed to normal courtesy relations, he/she shall inform the Supervisory Board, or their direct Supervisor, who shall then notify the Managing Director.

Any Recipient who, for their duties, negotiates contracts with third parties, must ensure that such contracts do not foresee or imply donations in violation of this Code.

The Company can supply contributions and sponsorships in support of proposed initiatives by non-profit public or private entities and associations which are legally constituted.

These sponsorships and contributions may relate to social, cultural and artistic events and initiatives. They can also be aimed at initiatives, research projects and conferences of Company interest.

5.2. Relationships with Public Administration

Dealings with Public Administration in the name and on behalf of the Company will only be handled by specifically appointed and trained staff, in accordance with the relevant regulations and the provisions of this document.

The following are particular examples of prohibited behaviour whether exhibited in Italy or abroad:

- promising , offering or otherwise providing or making payments of money or kind or other benefits (unless the sum is modest or the use of the modest amount conforms with normal business practices), even as a result of unlawful pressure, on a personal basis, to public officials or private parties, when appointed to public service, with the aim of promoting or furthering the Company's interests. The aforementioned requirements cannot be circumvented by resorting to other forms of aid or contributions such as assignments, consulting, advertising, sponsorships,

employment opportunities, business opportunities or any other kind of opportunity and so forth;

- Holding and engaging in such conduct and actions with the spouses, relatives or people related to those indicated above;
- Engaging in behaviour intended to improperly influence the decisions of the officials who negotiate or make decisions on behalf of the public administration;
- Providing or promising to give, seek or obtain information and/or documents that are confidential or likely to affect the integrity of reputation of either or both parties in violation of the principles of transparency and professional integrity;
- Representing the Company through consultants or third parties when conflicts of interest can occur; in such cases all persons engaging in these activities are subject to the same provisions established by this Code of Ethics.

The behaviour described is prohibited both in the course of business negotiations as well as any relations with Public Administration, and is prohibited even after these processes have been concluded, if such processes were adopted towards persons in charge of the negotiations or decision makers on behalf of the Public Administration.

The Recipients must ensure that the statements and testimonies given to public officials are accurate and truthful.

The Managing Director must be immediately informed of any legal action to be taken and any form of communication or formal notice received from the Public Administration.

The Company must, in selecting independent third parties, such as agents, distributors, *Partners*, suppliers, consultants, collaborators, and all who operate nationally and internationally in name and on behalf of the Company, verify that their reliability, integrity comply with the principles contained in this Code.

5.3. Relationships with suppliers - consultants - *Partners*

FI.MO.TEC. intends to establish and maintain exclusive relationships with suppliers who offer the maximum guarantee of fairness and ethics.

In line with this principle, the Company contractually binds their suppliers and service providers to respect the laws, as well as to acquaint themselves with and adhere to the principles of this Code of Ethics.

The selection of suppliers of materials, or of services and the acquisition of materials and services of any type is performed by the appropriate staff, meaning those who are chosen, based on criteria which is objective and traceability, characterised as serious, of quality, efficient and economically priced.

In relationships with suppliers, the Company draws on principles of transparency, equality, legality and free competition.

In particular, with regard to these relationships, Recipients are required to:

- Operate within the law and regulations currently in force and observe whatever rules and/or internal business practices for the selection and management of relationships with suppliers;
- Establish efficient, transparent and collaborative relationships, maintaining an open and frank dialogue and line of communication of best business practices;
- Obtain the collaboration of suppliers by constantly assuring them the best quality, cost efficiency and delivery times;
- Enforce the contractual conditions set forth;
- Request that suppliers follow the principles of this Code of Ethics and include these specific provisions in contracts.

In the case of suppliers of materials, the Company will verify the extent to which the material received responds to how much had been ordered.

The selection of external consultants is performed by staff charged with this duty. To this end, the Recipients must respect the internal rules for selection and management of relationships with external consultants. Compensation for these consultants must strictly commensurate with the services described in the contract.

In the development of relationships with other Partners by way of signing agency contracts or procurement, the constitution of the new company and/or the underwriting of joint venture contracts and that which is similar, Recipients must respect the principles of this Code of Ethics. They must also identify potential Partners or their members who have respectable reputations, ensuring they are carrying out only legal business and are operating on a similar basis of ethical principles as contained in this Code.

The Company recommends its suppliers, consultants and Partners abstain from offering gifts of any kind to the Board of Directors and to the Company's staff beyond what is a normal practice of courtesy.

5.4. Relationships with clients

The success of the Company is based on its ability to satisfy the needs of its clients while maintaining the highest levels of quality, performance and reliability. Recipients must adhere to this policy, identifying client needs and seeking out ways to go above and beyond their expectations, optimising Company resources.

In relationships with clients, the Company draws on the principles of transparency, equality, legality, and the free market. The Company assures fairness and clarity in business negotiations and in contractual obligations, and also in fulfilment of contracts.

Specifically, in dealings with clients, Recipients are required to:

- Operate within the law and adhere to regulations and possible internal business rules and/or practices in the management of clients;
- Not arbitrarily discriminate against clients, nor unduly exploit their positions with clients;
- Respect obligations undertaken with clients;
- Deliver information accurately, completely and truthfully.

In initiating business relations and management of relationships already underway, the Recipients must avoid relations with subjects involved in illegal activities or with those who do not meet the necessary requirements of business ethics and reliability.

Recipients must be most diligent in verifying and constantly monitoring this reliability.

5.5. Relationships with political organisations and trade unions

The relationships with political parties, union organisations and other interest associations are obliged to respect the regulations of this Code, especially with regard to impartiality and independence.

Representing the Company and any payments to associations of any type made in the name or on behalf of it, must be duly authorised by the Board of Directors and respect any internal rules and/or practices in force. This may be permitted only to organisations whose objectives are aligned with the economic and industrial policies, ethics and business conduct of the Company.

5.6. Relationships with media organisations

Information about the Company that is addressed to the mass media may be provided only by company departments specifically authorized to do so or with their authorization, in accordance with established business practices currently in effect for each subject; the Recipients, should they be asked to provide information or give interviews, must inform the company department in charge of such matters and obtain prior authorisation.

In any case, outside communication of data or information must be truthful, transparent and complete and must reflect in a uniform way, the company image and strategies, promoting company policy.

6. ACCOUNTING DATA

6.1. General Principles

All Recipients must ensure maximum levels of truth, transparency and completeness of information in every area of business development, each person responsible for his/her own area of expertise. All Recipients participating in the development of data contained in the balance sheets, corporate reports and all the social communications established by the law, should comply with such principles and accurately check the correctness of information.

All accounting entries which constitute the foundation of the balance sheets must be reported clearly, truthfully and fairly and stored with care within the corporate structure. The statutory financial statements must be dealt with clearly and according to the law and must show a true and fair representation of the financial and economic situation of the Company and the economic results of its business.

6.2. Financial resources

The Company is committed to ensuring that every operation and transaction is properly recorded, authorised, verified, legal, coherent and congruent, ensuring that all actions and operations are adequately recorded and it is possible to track the decision-making, authorization and implementation processes behind them.

The acquisition and disbursement of financial resources, and their administration and control, shall always be consistent with local and international approval and authorisation processes, as well as the internal regulations and/or business practices of approval and authorisation.

6.3. Bookkeeping

Each accounting record shall exactly reflect the information set out in the relevant support documents and shall be complete and fully auditable.

Accounting is based on the generally accepted accounting principles and systematically records the events deriving from the management of each single company.

Each accounts entry that reflects a company transaction must be supported by appropriately filed documentation by the Management. Each transaction must be supported by adequate documentation, enabling easy accounting, the reconstruction of the transaction and the identification of responsibility.

This documentation must assure the identification of the reason for the operation that generated the accounts entry and its relative authorisation. The documentation must be

easily available and filed according to appropriate criteria which make consulting and checking the documents by internal or external personnel easy to do.

The Recipients are required to cooperate in ensuring that every accountable transaction is recorded correctly and promptly so that management performance is represented correctly and promptly in order for the administrative accounting system to achieve its goals.

Should any Recipients become aware of falsifications or omissions or inaccuracies in accounting records or in any financial statements or any related documents, they are obliged to inform their department head and then possibly the Managing Director.

6.4. Fiscal management

The Company's approach is designed around maximum transparency and collaboration with relevant authorities, applying the tax law properly, thus complying with all relative requirements and deadlines. The Company rejects any operation aimed at evading tax law.

The Company guarantees that changes to tax regulations and fiscal matters are promptly communicated to relevant employees who must then become informed of all principal concepts and legal and accounting problems which could impact the Company's fiscal obligations.

6.5. Relations with the Supervisory Bodies

The Company maintains sound and ethical relations with Supervisory Bodies, ensuring the utmost diligence, professionalism, transparency, collaboration, availability, and full respect of their institutional role, accurately and promptly responding to any formal requests made.

All data and documents made available must be precise, clear, objective and thorough, in order to ensure the completeness, accuracy and truthfulness of the information provided avoiding, and if necessary reporting, in the proper way, any situations of conflict of interests.

6.6. Anti-laundering

The Company runs its business in full compliance with the regulations in force against money laundering and in compliance with the provisions issued by the competent authorities, for this purpose pledging to refuse to engage in suspicious transactions in terms of fairness and transparency.

Particular attention must likewise be given to relationships involving receipt or transfer of any sums of money or other benefits: In order to prevent the risk of performing, even

unintentionally or unawares, operations of any nature which concern money, assets or other benefits that are the proceeds of crimes, the Company shall abstain from accepting any cash payments whatsoever, bearer shares or payments through unauthorised intermediaries or through any third parties in such a manner as to make it impossible to identify the payer, or from any relations with persons having their main offices or operating in countries where the transparency of corporate business is not guaranteed and, in general, from performing operations that might preclude the reconstruction of cash flows.

The Recipients are required to promptly report to the Supervisory Body or the Managing Director any possible relationships with third parties not aligned with the provisions of the following paragraph.

The Recipients are therefore obliged to:

- Pre-emptively verify available information on business counterparts, on suppliers, *Partners*, agents, distributors, collaborators and consultants to establish whether their businesses are respectable and legitimate before establishing business relationships;
- Avoid any involvement whatsoever in business that could favour money laundering for illegal or criminal activities, and strictly respect the laws and regulations governing money laundering and internal control procedures;
- Not make payments to any parties other than the counterparties to the agreement nor to countries other than the country of the parties or where the contract is executed.

7. WORKPLACE AND ENVIRONMENTAL SAFETY

7.1. Workplace safety

The Company resolves to maintain the highest levels of well-being and safety and guarantees all necessary measures be taken to prevent accidents in the workplace and illness at work.

All Employees must contribute to maintaining a safe and healthy work environment in which they operate.

The principles and fundamental criteria for prevention, the basis of which constitutes decision-making of every type at every level, in matters of workplace health and safety are the following:

- Avoid risks;
- Evaluate risks which cannot be avoided;
- Reduce risks to a minimum in relation to the knowledge gained due to technical progress;
- Combat risks at their source;
- Respect ergonomic principles in the organisation of work and adapting the work to the individual, especially as regards the design of workplaces, the choice of work equipment and the choice of working and production methods, with an aim, in particular, of alleviating monotonous work and work at a predetermined work-rate and to reducing their effect on health;
- Take into account the degree of evolution of technique in the compliance of machinery and equipment and any other device in use;
- Replace that which is dangerous with what isn't hazardous or with what is less dangerous;
- Supply workers with measures to prevent and protect individuals from risks which are adequate with respect to identifying risks to prevention, working conditions, demands and needs of the workers;
- Plan risk prevention, developing a coherent overall prevention policy which covers the latest technology, organization of work, working conditions, social relationships and the influence of factors related to the working environment;
- Give priority to measures of collective prevention rather than individual prevention;
- Provide appropriate instructions to workers;
- Guarantee health checks of workers;
- Participate in the consultations and periodic meetings of matters which safeguard health and safety in the workplace;
- Provide adequate and sufficient information and training to all workers and managers. The specific education and training must occur during the establishment of the employment relationship or as the temporary labour relationship begins; in cases of relocation or changes to job description, with the introduction of new

equipment or new technologies and when new equipment, technologies, substances and hazardous matters are introduced;

- Training is facilitated by a qualified expert on the workplace premises. Training of workers and their representatives must be periodically repeated considering the evolution of risk or the onset of new risk. The contents of the training must be easy for employees to understand and enable them to gain knowledge and skills necessary in matters of health and safety in the workplace;
- Take appropriate measures to guarantee improvements in safety through the adoption of best practices;
- Provide for emergency measures to apply in cases of first aid, fire, evacuation of workers, and immediate and serious threats to health or safety;
- Use warning and safety signals.

Every activity of the Company and individuals, whether at executive levels of decision-making or at levels of operations where decisions are implemented, must be aimed at respecting these principles.

In addition, workers are obliged to:

- Properly use machinery and systems, individual protection equipment, as well as safety devices;
- Report any serious or immediate danger in the workplace as well as any defect of protection systems;
- Comply with all requirements relating to matters of health protection in order for the employer to guarantee that the work environment and working conditions are safe and free of risk;
- Contribute along with the employer and managers to the fulfilment of obligations set out to safeguard health and safety in the workplace.
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The Company handles communication with contractors regarding specific risks to the work environment and cooperates with them in developing measures for prevention of and protection from risks relative to each contractor.

7.2. Environment

The Company considers respect for the environment a fundamental value and so is committed to operating within the law in effect, applying the best technologies possible.

The principles and fundamental criteria for prevention, the basis of which constitutes decision-making of every type at every level, in matters of safeguarding the environment are the following:

- Combat risks at their source;
- Reduce risks to a minimum in relation to the knowledge gained due to technical progress;

- Take into account the degree of evolution of technique in the compliance of machinery and equipment and any other device in use;
- Provide adequate and sufficient information and training to all workers;
- Plan measures necessary to guarantee, over time, an increase in levels of environmental safeguarding;
- Regulate the maintenance of systems' equipment aiming at eliminating or reducing pollution.

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To this end, the Company pledges to:

- Adopt suitable environmental management systems which assure the prevention of environmental risks;
- Define specific goals and improvement programmes aimed at minimising significant environmental impacts;
- Provide institutions with the necessary information to understand the possible environmental risks involved with business activities;
- Develop, where necessary, specific emergency plans.

The Company also encourages its collaborators, suppliers and *Partners* to comply with the principles of safeguarding the environment outlined in this Code of Ethics, requesting, where necessary, the adoption of appropriate safeguards, thus aligning themselves with the Company's environmental policy.

8. SUPERVISORY BOARD

The task of monitoring the implementation of and compliance with this Code is charged to the Supervisory Board (OdV in Italian).

Without prejudice to compliance with any provision envisaged by regulations or collective contracts in force and subject to statutory obligations, the Supervisory Board is authorised to receive information on potential or real breaches of this Ethical Code.

All communication can be addressed to the Supervisory Board at this e-mail address odv@fimoworld.com or by regular post, FI.MO.TEC. S.p.A. Via Milano, 121, angolo Via Asti, 3 - 20093 Cologno Monzese (MI).

The Supervisory Board (OdV), under present Italian legislation, is subject to an obligation of strict confidentiality, and operates in accordance with impartiality, authority, continuity, professionalism and independence with a wide range of discretion and with the complete support of the Company's upper management, with whom it collaborates in absolute autonomy.

Each Recipient of this Code is obliged to report, without delay, any conduct by a Recipient that is not congruent with the principles of the present document.

9. SANCTIONS FOR VIOLATION OF THE CODE OF ETHICS

9.1. General Principles

Observance of the rules contained in this Code are to be considered part of the contractual obligation of FI.MO.TEC. Employees and also for agents, distributors, *Partners*, consultants, collaborators, suppliers and anyone working both domestically and abroad in the name of or on behalf of the Company and for all with current contracts who become 'Recipients' of the present code.

9.2. Sanctions

The Company, through the bodies and the functions it is appropriately in charge of, imposes, with consistency, impartiality, and uniformity, penalties which are proportionate to the respective violations of the Code and conform with the provisions in force regarding the regulation of working relations.

The penalties for Employees are consistent with measures indicated in the applicable National Collective Employment Contract (CCNL in Italian) and are detailed in the same contract and also in the Organisational, Management and Control Model.

Infractions committed by the Recipients who are not Employees of the Company must be promptly communicated in writing to the Supervisory Body, by whomever becomes aware of them.

Such infractions are punishable by the appropriate bodies based on the internal rules in force and by what is specifically prescribed by the relative contractual clauses.