

CORPORATE QUALITY/SAFETY SYSTEM (OMM)

CODE OF ETHICS

Revision 7.0 of 02/03/2017

1.1 FOREWORD

This document represents the values the company believes in and which it applies in the exercise of its business, also providing a set of provisions useful to align the activities of all those who work in it with such principles, so as to contribute to the prevention of crimes from which liability may arise for the company.

1.2 ETHICAL PRINCIPLES AND REPUTATION VALUE

In carrying out its business, unethical conduct compromises the relationship of trust that represents an essential intangible resource for the company.

Compliance with an essential core of values enhances the company's reputation and is the first step in preventing the commission of crimes in the field of occupational health and safety, which may give rise to liability for the company pursuant to Italian Legislative Decree No. 81 of 2008 and Italian Legislative Decree No. 231 of 2001.

The Code of Ethics, therefore, consists of:

general ethical principles on relations with the company's habitual contacts;

principles of conduct towards each class of company habitual contacts, suitable for preventing the risk of unethical conduct;

principles of conduct expressly aimed at preventing

commission of the crimes provided for by Italian Legislative Decree 81/2008 and by Italian Legislative Decree 231/2001;

implementation mechanisms, which describe the control system for compliance with the Code of Ethics, for its continuous improvement and the corresponding sanction system.

The company undertakes to promote the knowledge of the Code by recipients, ensuring its most widespread dissemination (employees, collaborators and all those who cooperate in the functioning of the company).

1.3 DESCRIPTION OF THE CODE AND USER GUIDE

The Code indicates the principles and models of conduct of the Company's business, as well as the commitments and responsibilities of employees. In this regard, the Code provides information on the resolution of ethical issues. In particular, a guiding principle is the conviction that acting in any way to the benefit of the company does not justify the adoption of conduct contravening these principles. All actions and operations relating to the company's business must be undertaken and pursued in compliance with legality, managed with the utmost fairness, based on completeness and transparency of information, supported by documentary evidence and subjected to checks and controls.

Relations with the Authorities must be based on utmost transparency and collaboration, fully respecting their institutional functions.

1.4 SCOPE OF APPLICATION OF THE CODE

The company will ensure:

the most widespread dissemination of the Code among company representatives and collaborators;

in-depth review and updating of the Code;

investigation of all reports of ascertained violation of the Code;

in the event of an ascertained violation, application of adequate sanctions.

1.5 OBLIGATIONS OF RECIPIENTS OF THE CODE

All recipients of the Code, within the scope of their responsibility, are required to comply with and ensure compliance with its principles.

In particular, ***all company representatives have the duty to know the provisions contained in the Code and to:*** refrain from conduct contrary to these provisions;

contact their superiors in case of need for clarification on the methods and organisation to safeguard health and safety, making all the necessary financial and knowledge resources available to the related structures. Within the scope of their duties, company personnel must participate in risk prevention, environmental protection and protection of health and safety with regard to themselves, their colleagues and third parties. As of October 2012, in application of the provisions of Article 30 of Italian Legislative Decree 81/2008 and Article 6 of Italian Legislative Decree 231/2001, the company has adopted an "organisational model", at the same time establishing its supervisory body with autonomous powers of initiative and control, with the task of supervising the functioning of and compliance with the model.

1.6 APPLICABILITY OF THE CODE IN RELATION TO THIRD PARTIES

The Code of Ethics applies to the following parties:

company representatives (directors, employees);
those who act with powers of representation of the company;
external consultants;
partners;
suppliers;
third parties in general.

All company employees, recipients of the Code, each in accordance with their responsibilities, must inform third parties with regard to the contents of the Code of Ethics

2 GENERAL ETHICAL PRINCIPLES

All the company's activities must be carried out in compliance with the general ethical principles listed below:

HONESTY AND COMPLIANCE WITH THE LAW: the pursuit of the company's interests can under no circumstances justify dishonest conduct;

PROFESSIONALISM: all the company's activities must be carried out with professional commitment and rigour and in a spirit of mutual respect and collaboration;

IMPARTIALITY: any discrimination based on age, sex, sexual orientation, personal and social conditions, race, language, nationality, political and trade union opinions and religious beliefs in decisions concerning the company's activities, relations with personnel and third parties is excluded;

FAIRNESS: situations in which the parties involved have a conflict of interest must always be avoided;

CONFIDENTIALITY: the company ensures the confidentiality of the information in its possession and refrains from soliciting confidential data from third parties, except in the case of express authorisation and compliance with current legal provisions; every recipient of the Code is required to operate in full compliance with current legislation on privacy and has the obligation to refrain from disclosing or using, for their own benefit or that of others, information relating to the company, so as to harm it (including, for example, the list of customers or documents relating to the company's organisation);

COOPERATION AND MUTUAL RESPECT IN THE WORKING RELATIONSHIP: the company entertains and concludes employment and collaboration relationships in compliance with current legislation, and relations between employees, at all levels, must be based on criteria of fairness, collaboration, loyalty and mutual respect;

CARE: the company as a whole, and each individual recipient of the Code, scrupulously preserve the tangible and intangible assets that constitute the company's equity.

3 HEALTH AND SAFETY

The company carries out its activities in accordance with current legislation protecting working conditions. Within the scope of its activities, the company is committed to disseminating and consolidating the culture of safety, developing, through the employer and company guarantees, risk awareness and using all the resources necessary to ensure the health and safety of employees, external collaborators and customers. For these reasons, the company undertakes to comply with current legislation on the prevention and protection of risks, adopting technical and organisational measures to protect health and safety, making all the necessary financial and knowledge resources available to the related structures.

Within the scope of their duties, company personnel must participate in risk prevention, environmental protection and protection of health and safety with regard to themselves, their colleagues and third parties.

As of October 2012, in application of the provisions of Article 30 of Italian Legislative Decree 81/2008 and Article 6 of Italian Legislative Decree 231/2001, the company has adopted an "organisational model", at the same time

establishing its supervisory body with autonomous powers of initiative and control, with the task of supervising the functioning of and compliance with the model.

4 EFFECTIVENESS OF THE CODE AND ITS VIOLATION

Compliance with the Code must be considered an essential part of the contractual obligations of employees pursuant to Art. 2104 of the Italian Civil Code.

Violation of the provisions of the Code may constitute a breach of the primary obligations of the employment relationship or a disciplinary offence, in compliance with the procedures provided for in Art. 7 of the Workers' Statute, with all legal consequences, also with regard to preservation of the employment relationship, and may entail compensation for damages resulting from the same. Compliance with the Code must be considered an essential part of the contractual obligations undertaken by company representatives. With regard to external consultants, suppliers and partners, VIOLATION OF THE PROVISIONS OF THE CODE may constitute a breach of contractual obligations, with all legal consequences, including termination of the contract and/or assignment and may result in compensation for damages resulting from the same.

Pursuant to Italian Legislative Decree No. 231/06, the Supervisory Body is assigned the following tasks for implementation of the provisions contained in the Code of Ethics:

take decisions regarding violations of the Code of significant importance;

express opinions on the review of the most important policies and procedures, in order to ensure their consistency with the Code of Ethics and the Organisational Model;

ensure the periodic review and amendment of the Code of Ethics and the Organisational Model.

The Supervisory Body operates with impartiality, authority, continuity, professionalism and autonomy and suggests any updates to the Code, also on the basis of reports received from the recipients.

The Supervisory Board also operates with ample discretion and with the full support of the Company's top management, with whom it collaborates in absolute independence.

5 REPORTS IN THE EVENT OF VIOLATION

In order to ensure the effectiveness of the Code, the Company provides information channels, also provided for by the organisational model, through which all those who become aware of any illegal conduct inside the Company can feel free to report it, directly and confidentially, to the EMPLOYER and to the Supervisory Body.

All employees and collaborators are required, without delay, to report any conduct, also of third parties, that does not comply with the principles of the Code.

Confidentiality of the identity of the whistleblower, as well as immunity of the latter from retaliation, unlawful conditioning, discomfort and discrimination of any kind in the workplace, is guaranteed for having reported a violation of the contents of the Code.

Should employees wish to lodge an appeal regarding a violation (or alleged violation) of the Code, they must contact their direct superior. If the dispute remains unresolved, or if employees feel uncomfortable talking to their direct superior, they may report to the Supervisory Board. Should third parties wish to lodge an appeal regarding a violation or alleged violation of the Code, they must contact the Supervisory Body.