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PREAMBLE

APS Arosio S.p.A.'s Code of ethics and business conduct is the set of **values, principles** and **rules** that all those who operate, cooperate and act for the Company carrying out corporate activities must adhere to (recipients).

The Code of Ethics is an essential tool on which the activities controlling and monitoring APS' economic, financial and social activities are based, with particular attention to external relations and internal controls. The main objective of the Code of Ethics is to guide and uniform the behaviour of subjects at all levels while they carry out activities within their duties and responsibilities concerning both internal and external relations in accordance with the general principles of transparency, good faith, correctness, honesty, loyalty and impartiality.

This Code of ethics also constitutes an integral part of the organisational and management models adopted by APS pursuant to **Legislative Decree 231 of 2001** with the aim to prevent the perpetration of criminal offences covered by such legislation.

1. THE COMPANY

APS Arosio S.p.A. operates worldwide with different trade and company names. In the areas of greatest interest, where Air Handling Unit (AHU) manufacturers operate, Aps Arosio has a logistics, technical and commercial base. In addition to the historical offices in Milan, there are partner companies in Northern Europe, Canada, the United States and South-East Asia.

APS Arosio creates the containment frame of AHUs by using various technical solutions that cover all manufacturers' needs. It has been specialising in air treatment for years and has therefore developed an extensive experience in this field.

Arosio's System is based on the concept of a three-way corner as a system to connect the profiles that make up the frame. In addition to the numerous corner and profile variations, APS Arosio also has a wide range of accessories - dampers, droplet separators, louvers, vibration-dampers, hinges, handles, etc...

The level of technology applied, the high quality of the materials, the wide range of accessories and prompt service are the features that make the APS Arosio brand a leader on the AHU market.

This enables modules to be made with aluminum or nylon accessories or thermal break modules that can be customised and manufactured with different features, such as air-tightness, heat and pressure resistance.

Top international manufacturers use Arosio's System.

The ISO 9001 System

The procedures and instructions defined by APS Arosio's quality manual are documents that implement the regulations and principles set out by this Code.

2. RECIPIENTS AND SCOPE OF APPLICATION OF THE CODE OF ETHICS

In this Code, the following expressions will have the meaning provided below:

“Code” refers to this code and any attachment as integrated and amended or supplemented;

“Recipients” refers to the subjects to which the provisions of this Code apply and, in particular: members of corporate bodies; managers; employees, collaborators and subjects whose services are at the disposal and under control of the Company; all individuals involved in outsourcing arrangements concerning the supply of services and activities from APS Arosio.

“Employees” refers to those subjects who are employed by APS Arosio, including contract or part-time workers (as well as posted workers and those with employment contracts in accordance with law no. 30 of 23rd February 2003).

“Collaborators” refers to those subjects who have with APS Arosio agency or commercial representation relationships as well as other coordinated and ongoing collaboration relationships, mainly personal and without subordination (including but not limited to project-based work, temporary jobs, starter programmes, summer internships) and any other relationship included in art. 409 of the Code of Civil Procedure¹, occasional work and any other person subjected to the management and supervision of any person in a senior position within APS Arosio pursuant to Legislative Decree no. 231 of 8th July 2001.

Code of Ethics provisions are applied to the Recipients listed above as well as all those who cooperate to carry out business activities and to pursue its objectives. They must adjust their behaviour to comply with the provisions and principles set out by the Code of Ethics and avoid taking initiatives in contrast with the Code.

All recipients have the right and obligation to know and apply the Code, ask for clarification in case of doubt and report omissions, if any.

In particular, APS must apply the Code of Ethics and undertakes to:

- keep collaborators informed in accordance with the rules set out by the Integrated Management System;
- favour the maximum dissemination of the Code of Ethics;
- carry out all necessary verifications and inspections when a possible violation is reported
- and apply, if necessary, suitable disciplinary sanctions.

APS has adopted an Internal Control system to make sure that all corporate activities are carried out in compliance with internal and external regulations. It consists of a series of behavioural rules, procedures and methods to counter mistakes, fraud and risk factors while carrying out corporate activities.

The control and supervision bodies of the company must make sure that the Code is observed by all the subjects and complies with current regulations.

¹ Art 409. Individual occupational disputes. The provisions of this Chapter apply in case of disputes concerning: 1) private subordinate employment relations, even if not connected with the activities of a company; 2) sharecropping, share farming, agricultural sharing, rental to direct producers as well as relationships established by other agricultural contracts except for the competences of specialised agricultural sectors; 3) agency and commercial representation contracts as well as other relationships that concern coordinated continuous work, mainly personal, although not subordinated; 4) employment relationships of public body employees and other public law relationships provided that they are not appointed to another judge.”

3. OUR COMMITMENT

APS Arosio undertakes to act in compliance with the law and principles of loyalty and correctness. The management of the Company and all corporate activities are carried out with strict regard to the ethical principles set out below.

3.1 Legality

In the context of their tasks, Recipients are expected to know and respect the regulations set forth in the legal system in which they operate and must in any case refrain from violating these laws and regulations regardless of whether they attract custodial, economic, administrative or other sanctions. Recipients undertake to diligently acquire the necessary knowledge of the laws applicable to their tasks in force from time to time.

In addition to the general principles of diligence and loyalty set forth by art. 2104 of the Civil Code, Recipients must also observe the behavioural provisions set out in applicable collective contracts.

3.2 Honesty and responsibility

APS undertakes to promote and favour honest behaviour.

When carrying out the corporate mission, the recipients' conduct must be inspired by honesty and responsibility ethics.

Recipients must avoid finding themselves in conflict of interest with APS while carrying out their tasks.

Conflict of interest refers to a situation in which an administrator, auditor, manager, employee, consultant or collaborator engages in a commissive/omissive conduct for personal gain.

3.3. Transparency, Impartiality and Equality

APS believes in the value of transparency and undertakes to manage its relationships with stakeholders providing true, complete and clear information favouring an informed relationship and knowledge sharing.

APS considers impartiality a fundamental value for all internal and external relationships.

In the provision of its services and when making decisions that affect the relationships with stakeholders, it recognises that everyone has the same rights without any discrimination on grounds of age, sex, sexuality, health, race, nationality, political opinion, trade union membership and religious belief.

3.4. Respect for the individual

APS firmly believes in respect for individuals.

Recipients must respect the rights and dignity of others and favour ordered coexistence in the workplace.

3.5. Confidentiality

APS undertakes to respect the privacy policy and to guarantee the maximum confidentiality of the information in its possession. It also refrains from seeking out confidential data except when foreseen by regulation and in those cases where it has been expressly authorised anyway, always in compliance with current regulations. Recipients are expected not to use confidential information for purposes other than those for which they were collected.

3.6. Competition

APS intends to develop the value of competition by adopting principles of correctness, fair competition and transparency towards all operators.

3.7. Environmental protection

ASP is aware of the impact its activities have on the economical-social development and quality of life in the reference area, therefore it undertakes to implement policies for the safeguarding of the surrounding territory.

3.8. Administrative, managerial and control bodies

Personnel holding representative, administrative, managerial, supervision or control roles must behave with the utmost honesty, transparency, correctness and independence.

Senior management personnel and Statutory Auditors must carry out their tasks with awareness and a sense of responsibility, cooperating and keeping each other informed to achieve corporate objectives and guarantee the authenticity of documents and information provided while performing governance functions.

In particular, Statutory Auditors and other personnel in charge of control operations have free access to data, documents and other useful information for the performance of their tasks. Personnel holding representative, administrative, managerial, supervision or control roles must refrain from carrying out activities that are against the interests of the Company and from pursuing their own or third party interests even if only potentially conflicting with and/or harmful for the interests of the Company. In case such conditions occur, personnel involved must immediately report them in compliance with the law and internal regulations.

4. RELATIONSHIPS WITH PERSONNEL

4.1. Development of human resources

APS believes human resources are fundamental for the development of the company, recognises their value and respects their autonomy.

It feels it is essential that administrators, managers, employees and collaborators are involved and actively take part in corporate activities in an aware and informed manner and it undertakes to safeguard and promote their professional growth with the aim of enhancing its pool of expertise.

To achieve all this, APS has implemented a procedure within its Quality Integrated Management System that defines the correct management of all activities connected to its personnel's working life.

In particular, APS' Integrated System describes:

- the procedure to select and recruit personnel;
- training.

Discrimination (on grounds of race, sexuality or sex, nationality, religion, language, membership to trade unions and politics) in recruitment, retribution, promotion and termination is expressly forbidden, as well as all kinds of favouritism.

4.2. Safety and health

APS undertakes to protect the safety, health and moral and physical integrity of its employees, consultants and Customers/Users.

With this aim in mind, it promotes responsible and safe behaviours and adopts all safety measures required by technological evolutions to guarantee a safe and healthy working environment in compliance with current regulations concerning accident prevention and workers' safety.

It therefore undertakes to implement and manage a safety management system in compliance with what set out by OHSAS 18001, as defined by a specific protocol for safety in the workplace.

4.3. Protection of individuals

APS is constantly at work to create a collaborative and non-hostile working environment and to prevent any kind of discriminating behaviour.

Recipients must collaborate with the company to maintain an atmosphere of mutual respect of everyone's dignity, honour and reputation.

Demands or threats aimed at inducing people to act against the law and the Code of Ethics or adopting behaviours detrimental to the moral and personal convictions of others will not be tolerated and will therefore be sanctioned.

4.4. Staff obligations

IAPS staff must respect the Code of Ethics, internal regulations and the law and conform its behaviour to the principles of integrity, correctness, loyalty and good face while carrying out its tasks.

4.5. Conflict of interest

Recipients must maintain their independence of judgement, integrity and impartiality, therefore preventing the making of decisions or carrying out of activities in conflict of interest situations.

All activities in contrast with the correct performance of tasks or that can damage the interests and image of the company must be avoided.

4.6. Corporate assets

APS personnel must use and take great care of the assets at its disposal for office reasons. The irregular use of corporate assets and resources is not admitted.

All employees are directly and personally responsible for the protection and legitimate use of assets and resources entrusted to them for the execution of their functions.

4.7. Use of computer systems

APS personnel must use the computer systems within the limits and interests of the company. Each employee is responsible for the safety of the systems used and is subject to applicable regulations.

APS expressly forbids any alteration of the functioning of computer or telecommunication systems and/or any manipulation of the data they contain that could cause unfair damage to others.

Personnel must not disclose their passwords to others and must pay the utmost attention and effort to prevent committing any crimes while using IT tools.

Anyone that becomes aware of the alteration of the computer system or data must immediately report it to the Office manager and internal control body.

4.8. Confidentiality

APS respects the privacy of its collaborators and protects the confidentiality of their personal data.

The Company is aware of and observes all current rules and regulations concerning the protection of personal data and implements the highest protection standards in all contexts.

It collects and processes sensitive and non-sensitive personal data on its employees and individuals and/or legal entities with which it has a relationship.

If required, data is processed with the consent of interest parties, in compliance with the procedures and limits set out by Legislative decree no. 196 of 2003.

Any investigation into ideas, preferences, personal tastes and the private life of workers in general is forbidden. These standards also forbid - except when required by the law - to disclose/release personal data without the prior consent of the interested party and establish the rules for the control of privacy protection regulations by each collaborator.

4.9. Information management

Personnel must preserve the confidentiality of information obtained while carrying out their functions in compliance with the law and regulations and use it only for the purposes for which it was collected.

Personnel must observe said obligation even after the termination of the working relationship, making sure the provisions set out by current privacy regulations are observed. They must also safeguard the deeds entrusted to them.

4.10. Obligations of collaborators

The provisions above are extended to all collaborators, even though occasional and working as APS consultants.

5. RELATIONS WITH CUSTOMERS

APS establishes with its Customers relationships characterised by extreme professionalism and based on availability, respect, courtesy, research and the provision of the utmost cooperation.

5.1. Contracts and communications

Contracts and communications with Customers must be:
clear and formulated using accessible language;
in compliance with current regulations.

APS undertakes to notify promptly and in an appropriate manner any change and variation in the supply of services.

It is also essential to:

- avoid establishing relationships with subjects who are known to be or suspected of being involved in illegal activities;
- exclude financial relationships with those economic activities that, even indirectly, stand in the way of human development and contribute to the violation of basic human rights (e.g. exploitation of child labour or employing workers without providing protection and guarantees);
- establish relationships that are independent from all forms of internal and external conditioning.

5.2. Quality

APS undertakes to guarantee the achievement of quality, safety and environmental standards and to periodically monitor the quality of the services supplied to Customers. APS undertakes to favour interaction with Customers through the management and quick settlement of any formal claims by using appropriate communication systems and justifying its refusals.

6. RELATIONSHIPS WITH SUPPLIERS

The relationships with suppliers, including those of financial or consultancy nature, are subjected to the principles of this Code and are constantly monitored by the Company.

The Company uses suppliers that operate in accordance with current regulations and with the principles set out by this Code.

The selection of suppliers and establishment of the terms of purchase must be based on an objective evaluation of the quality, price of goods and services offered and of the capability of supplying and assuring goods and services with an adequate level to the Company's requirements. In no case a supplier may be preferred to another because of personal relationships, privilege or benefits other

than those in the interest of the Company.

In procurement relationships, Company employees must:

- Observe internal procedures for the selection and management of the relationships with suppliers;
- refrain from excluding suppliers that meet the specified requirements from competing to become a Company supplier by adopting objective assessment criteria according to stated and transparent procedures;
- suppliers of machinery and equipment will also have to be selected on the basis of the compliance of their supplies with regulations concerning safety and hygiene in the workplace. The supply of personal protection equipment and general safety and prevention devices must comply with the obligations concerning general and specific certifications and suitability relevant to the use for which they were intended.

7. RELATIONSHIP WITH PUBLIC ADMINISTRATION AND SUPERVISORY AUTHORITIES

In its relationships with the Public Administration, Public Safety Authorities and Bodies that carry out public benefit or public interest activities or that are related to the public sector, APS strictly observes all applicable Community, national and corporate regulations.

The management of negotiations, undertaking of commitments and relationships of any kind with the Public Administration, Public Safety Authorities and Bodies that carry out public benefit or public interest activities or anyway related to the public sector is reserved exclusively to appointed and/or authorised corporate functions.

In its relationships with the Public Administration and with Public Safety Authorities in particular, all employees, collaborators or consultants must refrain from improperly influencing the decisions of the institution concerned with the purpose of obtaining the performance of acts contrary to office duties and, in particular, offering or promising - either directly or indirectly - gifts, money, favours or benefits of any kind. Employees or collaborators that receive requests or indications to do so must immediately notify internal control bodies.

APS' relationships with Supervisory and Control Authorities are based on the maximum cooperation and respect of their institutional role. The company undertakes in fact to promptly implement their provisions. APS requires that all employees and collaborators offer the maximum availability and cooperation to public officials or similar subjects that carry out inspections and checks on the activities of the Company.

It is expressly prohibited to destroy or alter recordings, minutes, accounts and all other types of documents, lie or make false statements to competent authorities or attempt to persuade others to provide false or misleading information to such authorities.

8. TRANSPARENCY OF ACCOUNTS AND PREVENTION OF CORPORATE OFFENCES

Accounts are strictly based on the general principles of truthfulness, accuracy, completeness, clarity and transparency of the data recorded.

Management deeds must be represented in a correct, complete and prompt manner in accounting and company databases.

All transactions must be traceable and suitably documented in full observance - in substance and form - of regulations and procedures in force so as to enable their complete reconstruction at any given time.

Financial statements must strictly comply with the general principles of realistic and correct representation of the capital, economic and financial status in compliance with general and particular

regulations in force.

Assessment criteria refer to the Civil Code and general acceptance standards.

Employees and collaborators must respect accounting and organisational separation principles to guarantee the maximum correctness and transparency in the management of accounting operations in compliance with provisions in force.

Any omission, error and forgery of accounting records must be promptly reported to control bodies.

9. PREVENTION OF TERRORIST OFFENCES, SUBVERSION OF THE DEMOCRATIC ORDER AND CRIMES AGAINST INDIVIDUALS

APS Arosio carries out its activities in full compliance with regulations against terrorist offences, subversion of the democratic order and crimes against individuals and undertakes to refuse to engage in suspicious transactions in terms of fairness and transparency.

Therefore, APS Arosio:

- carries out a prior verification on information available on commercial counterparts, suppliers, partners and consultants to assess the respectability and legitimacy of their activities before establishing business relationships with them;
- conducts its activities in a way that avoids any implication in operations that favour such offences, even if only potentially.

10. RELATIONSHIP WITH THE ENVIRONMENT

The environment is a primary resource for the community that APS Arosio wishes to contribute safeguarding. The company plans its activities seeking a balance between economic initiatives and environmental needs, in compliance with applicable laws and regulations and ensuring the maximum cooperation with the Public authorities concerned with the monitoring, control and protection of the Environment. The Recipients of this Code contribute to the environmental protection process. In particular, those involved in the production processes must pay the utmost attention to avoid any illegal dumping or emission of harmful materials and handle hazardous waste or residues in accordance with specific provisions.

11. CONTROLS AND REPORTS

11.1. Reporting obligations

Should a company representative, employee, collaborator or third party learn about the violation of one or more provisions set out by this Code for any reason, he must immediately use the following communication channels:

- the hierarchical superior if the reporter is an employee;
- internal controlling bodies in case it is not possible (e.g. there is no hierarchical superior) or advisable (e.g. the hierarchical superior is involved) to proceed with the notification of the hierarchical superior or if the reporter holds a managerial position.

The heads of each corporate department must oversee the work of their employees and report any possible violation of the provisions set out by this Code and related procedures to internal control organs.

The company protects those who report breaches in good faith from any form of retaliation,

discrimination or penalty and guarantees not to disclose their identity except for legal obligations.
Reports can be sent to the following address: odv231@apsarosio.com

11.2. Sanctions and measures

Anyone who carries out acts or omissions that violate the rules set out by this Code will be sanctioned by the Company with disciplinary measures in proportion to the severity or repetition of the infringement or the degree of fault, also according to what envisaged by the **Disciplinary system** attached.

If the provisions are violated by collaborators, external consultants or suppliers of goods and services, the sanctions will be established by competent bodies and, in the most serious cases, may lead to the suspension or termination of the contract, without prejudice to APS' right to obtain compensation for damages suffered due to the unlawful conduct.

12. APPROVAL AND UPDATE

This document was approved by the Assembly on 20th April 2015 and entered into force on that date.

Attachment: Disciplinary system

Objective of the disciplinary system

Aps Arosio intends to bring its conduct into compliance with the principles set out by the Code of Ethics, therefore condemning illegal or dishonest conduct.

Such commitment is outlined by management and organisational models and the relative procedures and regulations. Respecting such documents is therefore essential so the company can grow healthily and shielded from any legal risk.

This document formalises and constitutes the Penalty System envisaged by corporate compliance models to guarantee the respect for its provisions and the relative protocols and procedures as well as its refrain from engaging in unlawful and unfair practices.

The objective of the Penalty System is to discourage Aps Arosio staff and other recipients from carrying out unlawful or unfair practices, sanctioning behaviour that violates the compliance with those protocols and procedures that aim at guaranteeing a fair and lawful behaviour while carrying out working and contractual performances.

The Penalty System is also effective in case some corporate procedures are violated - although such violations are not considered as offences pursuant to Legislative decree no. 231 of 2001, they must be considered relevant for technical-organisational, legal and economic purposes.

This Disciplinary System supplements and does not replace the more general penalty and disciplinary system concerning the relationships between employer and employee as governed by public and private labour law.

Scope of application

The Disciplinary System forms part of the more general employee due diligence and obedience obligations set out by articles 2104, 2105, 2106, 2118 and 2119 of the Civil Code and of the employer's right to design and implement dedicated disciplinary tools as integrated by the CCNL (National Collective Employment Contract) and Workers Statute.

The Disciplinary System lays down penalties commensurate with the gravity of the offence and

must comply with the provisions of the Workers Statute and CCNLs in force in consideration of the elements listed below:

- a) the subjective element of behaviour, depending on wilful default or recklessness;
- b) importance of the violation;
- c) level of hierarchical or technical responsibility;
- d) the presence of aggravating and mitigating circumstances, especially for what concerns professionalism, previous work experience and the circumstances in which the violation was committed;
- e) possible sharing of responsibility with other workers who have helped in determining the wrongdoing;
- f) behaviour that may compromise, if only just potentially, the effectiveness of organisational models.

Should several punishable violations be committed with one single act, the most severe penalty will be applied.

The potential recipients of disciplinary sanctions are mainly senior personnel and subjects subordinate to the management of others.

Implementation responsibility

Aps Arosio, represented by its Sole Administrator, is responsible for the formalisation, implementation and revision of this Disciplinary System.

In compliance with what set out by the Workers' Statute, the control bodies of the company have the right to be informed about any imposition of penalties and may provide their assessment as regards the circumstances without any obligation for the corporate function in charge with the decision and implementation of the sanction.

In addition, the Disciplinary System may also be activated upon reports from internal controlling bodies in charge with investigating and imposing the sanctions.

Operational Procedures

The operational procedures for the application of the Disciplinary System according to the different types of Recipient and sanctions are described below.

Measures against employees

Failing to observe or violating the law, general principles of this document, behavioural rules imposed by the Code of Ethics and corporate procedures constitute a breach of the obligations under the employment relationship and a disciplinary offence.

For what concerns non-management employees, it is necessary to respect the limits related to the disciplinary power imposed by art. 7 of law no. 300/1970 and the CCNL concerning applicable sanctions (generally speaking these are typified in relation to their connection to specific disciplinary offences) and in respect of the way in which this power is exercised.

With reference to applicable penalties, it must be pointed out that they will be adopted and implemented in full compliance with the procedures envisaged by applicable national and corporate collective agreements.

In particular, the following CCNL penalties will be applied for non-executive employees:

- 1) verbal reprimands for minor faults;
- 2) written reprimands;

- 3) a fine not exceeding the amount of 4 hours of normal remuneration;
- 4) suspension from work without pay;
- 5) disciplinary dismissal without notice and with other reasonable or statutory consequences.

The minimum penalty will not be applied for the violation of the Code of Ethics or related documents - a "written reprimand" will be considered. With regards to internal procedures, the following are part of category 2) by way of example: minor violations of behavioural rules for aspects not related to safety in the workplace, environmental rules and the privacy and confidentiality of information. Violations related to safety in the workplace (e.g. failure to use personal protection equipment, specific tools, specific on-board instructions or violations of supervision obligations), the respect of environmental obligations (e.g. failure to register waste), data privacy and confidentiality (e.g. circumvention of network access and PC use procedures) are part of category 3). Any attempt to corrupt personnel with over 3 years of experience or executive responsibilities is considered a serious shortcoming and will be sanctioned with immediate suspension followed by an assessment from the administrative body.

Measures against executives

Should executives violate the behavioural principles set out by the Code of Ethics and connected regulations and procedures, Aps Arosio will apply the most suitable measures towards those responsible according to position held, severity of the violation and the particular fiduciary relationship between Aps Arosio and the executive.

The Administrative Body is responsible for the management of disciplinary procedures and implementation of penalties.

Measures against Administrators, auditors, Mayors and external or internal control bodies

In case of offences and violations of the Code of Ethics, Organisational and management Models or corporate procedures by the subjects above, internal control bodies will notify the Administrative Body or Assembly, which will then take appropriate action.

Measures against other collaborators (advisors and outsourcers)

All violations of laws, general principles and behavioural rules set out by the Code of Ethics is sanctioned in accordance with the specific contractual clauses included in the relative agreements (termination or suspension clause).

Extract from the National Collective Tertiary Contract - distribution and services

CHAPTER XXI - Staff obligations and disciplinary rules

Art. 212 Worker obligations

Workers have the obligation to strictly observe their duties and professional secrecy, be courteous towards the public and behave in compliance with civic duties.

Workers also have the obligation to diligently store the goods and material and cooperate towards the company's prosperity.

Art. 213 Prohibitions

Personnel must not return to company premises or stay beyond working hours except for service requirements and with the authorisation of the company, and except for what set out by art. 30 of this contract. Personnel must not leave the workplace during working hours except for work-related reasons and with express authorisation.

Employers may not keep personnel at work longer than normal working hours except in case of overtime.

Workers may leave the workplace even for non-work-related reasons with the prior authorisation of the company. Employers have the right to require workers to make up for the working hours lost without having to grant extra pay up to a maximum of one hour per day.

Art. 214 Absence justification

Except in case of legitimate impediment, for which workers must anyway provide proof, and without prejudice to the obligation to notify the employer immediately, all absences must be justified in written form within 48 hours for possible investigations.

In case of unjustified absences, retribution will be withheld in the measure of as many days as the days of absence in compliance with art. 187, except for the application of the sanctions set out by art. 217 below.

Art. 215 Adherence to working hours

Workers must adhere to working hours. Should a worker arrive late, an amount of money will be withheld from the retribution equal to the hours of work missed, without prejudice to the sanction set out by art. 217 below.

Art. 216 Change of address notification

Workers must immediately notify the company of any change of address both during service and time off.

In addition, workers have the obligation to respect any other provision implemented by the company as long as it does not contradict this contract and current regulations and complies with the normal powers of the employer.

Such regulations must be made known to personnel in written form or by means of posting a notice on the company premises.

Art. 217 Disciplinary measures

Should workers fail to observe their obligations, the employer shall take the following measures in accordance with the entity of the faults and circumstances:

- 1) verbal reprimands for minor faults;
- 2) written reprimand in case of category 1) faults are repeated;
- 3) a fine not exceeding the amount of 4 hours of normal remuneration as set out by art. 185;
- 4) suspension from work without pay for a maximum of 10 days;
- 5) disciplinary dismissal without notice and with other reasonable or statutory consequences.

A fine will be issued against workers who:

- start working late without a justification, for an amount equal to the hours missed;
- carry out their tasks with negligence;
- miss work without providing justification for up to three days in a solar year;
- do not notify the company about address changes both during service or time off.

Suspension of work without pay shall be applied to those workers who:

- are responsible for the damaging of goods they use or are supplied with;
- arrive at work drunk;
- commit the same fault for which a fine is issued more than three times in a solar year, except in case of unjustified absence.

Except for all other legal actions, the provision of point 5 (disciplinary dismissal) is only applied for the following:

- unjustified absence for longer than three days in a solar year;
- arriving late without a justification over five times in a solar year and after a written reprimand has been issued;
- severe violation of the obligations set out in art. 212, paragraphs 1° and 2°, Part Two;
- violation of regulations concerning the safety of processing, storing, selling and transporting;
- breach of trust, competition, violation of professional secrecy; carrying out work outside working hours in competition with corporate activities either personally or on behalf of third parties;
- repeating one of the faults for which suspension is envisaged over three times, except for what envisaged for repeatedly showing up late.

The money collected with the fines will be destined to the Employee pension fund. Workers have the right to access all documents concerning the transfer of such money.

Art. 218 Disciplinary code

Pursuant to and as an effect of art. 7 of law no. 300 of 20th May 1970, the provisions set out by the articles in Chapter XXI and those in the regulations or corporate agreements concerning disciplinary sanctions must be made known to all workers by posting them in a place accessible to all.

Workers subjected to a disciplinary action who wish to appeal may recourse to the conciliation procedure set out by art. 7, law no. 300 of 20th May 1970 or by SECTION THREE of this contract.

Art. 219 Disciplinary measures regulation

The implementation of disciplinary measures must be made known to workers via registered letter with return receipt within 15 days from the deadline when the worker may provide his counter-arguments.

In case of difficulties during the counter-argument evaluation phase or in reaching a decision, the deadline may be extended by 30 days, provided that the company immediately notifies the interested party in written form.