



# **CODE OF ETHICS**

REDECAM GROUP S.R.L.  
Piazza Indro Montanelli, 20  
20099 Sesto San Giovanni (MI)

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## **1\_ MAIN PRINCIPLES**

### **1.1 Introduction**

Redecam Group s.r.l. (hereinafter called “Redecam”) adopted an organization model which prevents the risk of perpetrating the crimes set forth by Law Decree 231/2001 and further modifications and of limiting any related impacts in case some offences are committed fraudulently eluding it.

This Code of Ethics is an integral part of the Organization Model (hereinafter called “CMO”) adopted by Redecam.

### **1.2 Purpose of the Code of Ethics**

This Code of Ethics defines the relevant ethic principles and the behavioural rules with the purpose to prevent any crimes set forth by ex-Law Decree 231/2001 and specifically contains the set of rights, duties and responsibilities of Redecam towards the “stakeholders: employees, collaborators, suppliers, Public Administration, clients.”.

### **1.3 Recipients of the Code of Ethics**

The rules of this Code of Ethics are binding and apply to all Redecam’s employees, as well as collaborators, subcontractors and external consultants who operate on behalf of Redecam. The claim to be acting for an interest or benefit for Redecam never justifies the adoption of behaviours which are conflicting to those indicated in this document.

### **1.4 Contractual value of the Code of Ethics**

The observance of the rules of the Code, must be considered as an essential part of the contractual obligations of Redecam’s employees in accordance with the provisions set forth by art. 2104 and following articles of the Civil Code.

The breach of the rules of this Code harms the trustworthy relation established with Redecam and will be sanctioned proportionally to the seriousness of the infraction committed, in compliance with what is indicated in the disciplinary system defined by the Organization Model, of which the Code of Ethics is a part; being understood for the employees the observance of the procedures of the CCNL (Engineering and industry national collective labour agreement), and the Workers’ Statute (Law 300/1970).

Analogously, the third subjects who collaborate with Redecam due to work contracts, tenders, professional collaborations or partnerships must observe this Code of Ethics.

Any breaches committed by such subjects will be sanctioned according to the criteria indicated in the specific contractual clauses (expressed termination and/or which apply penalties) introduced in the relevant agreements.

### 1.5 Spread of the Code of Ethics

Redecam undertakes to ensure the knowledge and spread of the Code through:

- the distribution to all the employees, collaborators, subcontractors and consultants,
- the availability of the document at the Redecam head office,
- the notification and spread of specific information to clients, suppliers and all those who have any relationships with Redecam,
- the availability of the document for any consultation on its own internet website

### 1.6 Control and update of the Code of Ethics

Redecam undertakes to:

- adapt the contents of the Code to the legislative evolution,
- perform the appropriate checks in presence of any suspected breaches of the rules contained in this document,
- apply the sanctions set forth in case of a confirmed breach,
- ensure that no retaliatory act will be committed against those who may have provided some information about the offence,
- operate so that the personnel understands the importance of observing the rules of this Code.

### 1.7 Obligation of Redecam's directors, auditors, employees and collaborators

Any Redecam's Director, Auditor, Employee and Collaborator must know the principles and contents of this Code of Ethics and the ethical rules which govern the activity carried out due to his own function, as set forth by the Law or internal procedure and internal regulations.

In particular, such figures must:

- refrain from any behaviours which are conflicting to such rules, principles and regulations;
- turn to his own contact person and the Supervisory Body to ask for clarifications about their application;
- notify promptly the Supervisory Body of any cases or requests of breach of the Code of Ethics;
- collaborate, if required, in the check of any breaches;
- inform appropriately any third party about the existence of the Code of Ethics and the duties and obligations imposed to external subjects by it; indeed, any external subject which has relationships with Redecam (third parties, consultants, suppliers, clients, etc.) must observe, within such relationships, the laws and regulations governing the activities performed by Redecam itself.

Redecam does not start or continue any relationship with anyone does not observe such principle.

Redecam informs its own employees and collaborators about the laws and behaviours to be taken, in case of any uncertainty by them about this subject

### 1.8 Implementation of the Code of Ethics

The Supervisory Body (SB), established in accordance with art. 6 of Law Decree 231/01, must supervise about the implementation and observance of the Organization and control model ex-Law Decree 231/01, including the Code of Ethics, which represents its main preventive protocol, ensuring its update.

In order to ensure the knowledge and observance of the Code and the required behavioural rules, the Supervisory Body promotes specific training initiatives which are differentiated according to the roles and responsibilities of the Recipients.

Redecam adopts appropriate contractual clauses to regulate the relationships with external collaborators and with which it has business relationships.

In order to ensure the observance of the ethical principles indicated in this Code, to which Redecam inspires its own company management and the performance of its own core business, it requires a written commitment by its commercial partners to observe the Code adopted by Redecam itself as they are aware of the contractual sanctions which are prescribed in case of breach.

### 1.9 Reference ethical principles

#### *Honesty*

Honesty represents the fundamental principle for all Redecam's activities and initiatives, and constitutes an essential value of the organization management. The relations with the stakeholders, at all levels, must be inspired to criteria and behaviours of fairness, collaboration, loyalty and mutual respect.

#### *Legality*

Redecam undertakes to observe all the rules, laws, directives and national and international regulations and all the generally recognized practices in force in all the countries in which it operates; moreover Redecam inspires its own decisions and behaviours to the care of the public interest entrusted to it.

#### *Fairness and Transparency*

Redecam is committed to pursue a communication of the information about its own financial, accounting and management activities, inspired to principles of transparency and fairness. Specifically, Redecam undertakes to:

- ensure that every operation is performed so to be correctly registered, authorized, verifiable,  
legitimate, consistent and congruous;

- foresee, for each operation, an appropriate document support to make it possible, in any moment, to check it and certify the features and reasons of the operation, and to identify those who authorized, performed, registered and checked the operation itself.

#### *Responsibility toward the community*

Redecam, aware of its own role and social responsibility as a company, intends to operate in observance of the surrounding community, supporting any cultural and social initiatives aimed to general wellness and sustainable economic development.

#### *Respect of Privacy in treating the information*

Redecam ensures the privacy of the information in its possession, the observance of the legislation about personal data protection and treatment and undertakes not to use any reserved information for purposes which are not allowed by Law Decree 196/2003 or the regulations in force in the countries in which it operates to which it may be subjected.

#### *Centrality of the person*

Redecam promotes the respect of the physical and cultural integrity of the person, the workers' freedom of association and the respect of the interpersonal dimension of relationships.

In particular Redecam protects and promotes the value of human resources, in order to improve and increase the assets and competitiveness of competences and knowledge of each employee and collaborator.

#### *Impartiality and equal opportunities*

Redecam avoids any discriminations due to age, sex, sexuality, state of health, race, nationality, political opinions and religious beliefs, in all the decisions which affect the relations with its stakeholders.

#### *Health and Safety*

Redecam ensures safe and healthy work conditions to its own employees and collaborators, as well as a healthy environment ensuring the presence of rules and a policy for their physical integrity.

#### *Diligence and fairness in managing the contracts*

The sale contracts of goods and service presentation contracts are stipulated according to what is consciously defined by the involved contractual parties. Redecam undertakes not to use, for its own benefit, any conditions of ignorance or incapacity of its own counterparties.

#### *Fair competition*

Since Redecam operates at international level, it has acquired the international value of "*fair competition*" and shapes its own business to principles of fair competition refraining from any corruptive and collusive behaviours or arbitrary or illegal dominating position.

#### *Quality Research*

Redecam orients its own activity to the satisfaction and safeguard of its own clients taking into account the requests which can improve the quality of its own services.

## **2\_ RULES OF CONDUCT**

In compliance with what is indicated by the Confindustria guidelines, Redecam defines the rules of conduct which must be followed by all the subjects who must observe the Code of Ethics identified in point 1.3, in implementing their own activities.

### *Fight against illegal behaviours*

Redecam, in accordance with the values of honesty and transparency, undertakes to implement all the measures required to prevent and avoid any perpetration of offences, thanks to the adoption of the OCM. In particular, it prohibits that any amounts of money are paid or other forms of corruption occur in order to obtain any direct or indirect advantages to Redecam itself. It also prohibits the acceptance of any gifts or favours by third parties which go beyond the usual rules of hospitality and kindness. As for the personnel management, Redecam undertakes to check the regular citizenship of the hired personnel and supervise the deadline of the residence permits.

### *Fight against terrorism*

Redecam undertakes not to provide directly or indirectly, even accidentally, any funds to subjects who promote, constitute, manage associations or who intend to carry out any terrorism crimes or violent acts with purposes of subversion of the democratic order.

### *Fight against organized crime*

Redecam strongly condemns and contrasts, with all the available instruments, any form of organized crime, even mafia-like ones. Redecam places significant care to check the proper requirements of reputation and reliability of the commercial counterparties such as, for example, suppliers, agents, consultants, contractors, clients, partners (even involved in a business partnerships). Such care will be paid both before the establishment of the relation and during it, by requesting the necessary information to verify their moral integrity, respectability, reliability and legitimacy of the activities carried out.

### *Prevention of receiving of stolen goods, money laundering and utilisation of money and goods of unlawful origin*

Redecam undertakes not to accept any requests which may arouse the suspicion of an attempt to legalize the proceeds coming from unlawful activities. In particular, it is forbidden to perform the following actions:

- receive and/or make payments on bank current accounts in “black list” countries or anyway in different countries from the country in which the head offices of the contracting companies are located;
- receive and/or make payments in cash for amounts higher or equal to the legal limit in force;
- receive and/or make payments on current accounts assigned to different subjects from the contracting company, even when such payments are presented as an offsetting transaction of credits;
- purchase and/or receive any goods which may be reasonably suspected to come from an illegal source.

- perform the operation in hypothesis of conflicts of interest which may compromise the objectivity, transparency or lawfulness of the operation itself or another one which is immediately connected or subsequent.

#### *Fight against conflicts of interest*

The Recipients must assume a correct behaviour. For such purpose, some specific practices are provided for the purchase office and the administrative offices, which deal with the parameter of objectivity of the operation and the reasonableness of the price. Therefore Redecam adopts the following principles of behaviour:

- The recipients must refrain from acquiring shares or participating to activities in a conflict of interest, direct or indirect, which, as such, prevent to correctly comply with the respective obligations and/or may affect the judgment or capacity to act correctly according to the rules of fair competition and efficiency optimization;
- In case of profit sharing the Recipients must promptly notify it to the Supervisory Body to the appropriate e-mailbox [Odv@recedam.it](mailto:Odv@recedam.it), so that it performs, in the ways and forms indicated for the information flows in compliance with Law Decree 231/2001, the required evaluations in collaboration with the Statutory Auditor Board and the body which is in charge of the accounting control;
- Redecam carried out its own business and related financial operations in compliance with the best international accounting principles and in accordance with the applicable provisions of the Sarbanes-Oxley Act;
- the Recipients must ensure that their own actions and decisions are not affected by any interests which may reasonably be configured as interests in conflict with those of Redecam.

#### *Presents, gifts and other forms of benefits*

The donation and acceptance of any gifts or other utilities must occur in compliance with the generally accepted commercial and ethical practices, in observance of the legislation in force and in accordance with the local habits and traditions.

Redecam, except for the commercial courtesy practices, adopts the following principles of behaviour:

- It is not allowed to give any presents, hospitality or other benefits which may compromise, in any situation, the independence of judgment toward any interlocutor, namely the independence of judgment of the beneficiary.
- It is not allowed to accept any presents, hospitality or other benefits which may compromise, in any situation, the independence of judgment toward any interlocutor, namely the independence of judgment of the granter.

The gifts or any other benefits are admitted only if they cannot be interpreted as ambiguous and deceptive, so that it may be reasonably intended to be aimed to obtain an illegal, arbitrary or undue favourable treatment with respect to the reference context of the operation.

### *Management of company operations*

Each operation and company transaction must be correctly registered, authorized, verifiable, legitimate, consistent and congruous all the actions and operations performed by the organization must be properly registered and it must be possible to verify the decision-making, authorization and development process.

For each operation an appropriate document support must be available in order to check it and certify the features and reasons of the operation, and to identify those who authorized, performed, registered and checked the operation itself

### *Accounting and administrative management*

The accounting documentation must indicate, in an accurate, correct and specific way, the details of the operation carried out. All the operations are authorized in compliance with the formalized delegation system and must be registered so to make it possible to have a correct drafting of the financial statement.

All subjects (employees and/or consultants) who, in any way, even as simple data providers, are involved in the formation of the financial statement, or documents which represent the economic, assets/liabilities or financial situation of Redecam, as well as in particular the Directors, Auditors:

- must provide the maximum collaboration for the specific aspects ensuring the completeness and clarity of the information provided as well as the accuracy of data and elaborations;
- must not expose any facts not corresponding to truth, even if they are object of evaluation, namely omit any information or hide any data in direct or indirect breach of the legislative principles and internal procedural rules, so to mislead the recipients of the above-mentioned documents.

It is forbidden to prevent or even obstruct the implementation of the control or audit activities which are legally attributed to the shareholders, board of auditors, the Supervisor Body or the audit firm.

It is forbidden to spread any false news or carry out any simulated operations or other artifices in order to provoke a sensible alteration of the price of financial instruments, listed or not.

All those who have relations with the public supervisor activities, as well as the directors, auditors and those who hold top positions, must not obstruct its functions.

It is also forbidden, in the notifications to such authorities, to expose any facts not corresponding to truth, even if they are object of evaluation, about the economic, assets/liabilities or financial situation of Redecam, or to hide with other fraudulent means, whole or in part, any facts concerning the situation itself which should have been notified.

The employees and consultants must refrain from any behaviour which may, directly or indirectly, cause any phenomena of insider trading even by third parties.

The employees, consultants, members of the board of directors, auditors and, more generally, all the subjects who have access to reserved information, not accessible to the public and such to affect the value of shares and –more generally- any other share released to the public, must refrain from using such information for the trading of such shares, in order to ensure the maximum market transparency.

The money and activities must be registered in compliance with the accounting principles adopted by Redecam. It is strictly forbidden to use Redecam money and activities for

unlawful and unjustified purposes; the administrative manager must pay full attention to ensure the observance of such prohibition.

The Redecam registers and account books must be maintained in compliance with the reference provisions and legislation in force, even to ensure the transparency, legality and reliability of Redecam's financial statement.

#### *Cash management*

It is forbidden to counterfeit, hold, spend or even circulate any banknotes, coins, public credit cards, counterfeit or altered duty stamps. Those who receive any banknotes or coins or public credit cards which may be counterfeit or stolen, must inform his own direct superior, so that he can appropriately report to the authorities.

#### *Management of computer instruments*

Those who use computer instruments must strictly observe the Redecam policies about computer security and must use the company resources – such as personal computers, telephones and other communication instruments – in compliance with such policies, refraining from any behaviours which may compromise the functionality and protection of the computer system of the company and/or third parties. It is forbidden, in any way, to alter the operation of a telematic or computer system of the company, namely of the data and information contained in it, or to intervene on programs and archives, for any purposes it is performed. The prohibition is strengthened if the damaged party is the State or a public organization.

#### *Protection of industrial and intellectual property rights*

Redecam acts in full compliance of the industrial and intellectual property rights which are awfully held by third parties, as well as with laws, regulations and agreements, also at an EU and/or international level, to protect said rights.

In this regard, all recipients must respect the legitimate industrial and intellectual property rights of third parties and shall refrain from any unauthorised use of said rights, aware that infringement of said rights may have negative consequences for Redecam.

In particular, the personnel, in carrying out their activities, must refrain from any conduct that may encroach industrial property rights, alter or counterfeit distinguishing marks of industrial products, or of patents, drawings or industrial models, whether national or international, and must also refrain from importing, marketing or in any case using or circulating industrial products with distinguishing marks that are counterfeit or altered or that encroach industrial property rights.

The recipients must refrain from unlawfully and/or improperly using, in their own interests or in the interests of the company or of third parties, intellectual works (or parts thereof), which are protected pursuant to copyright law.

#### *Protection of market and free competition*

Redecam undertakes to carry out its activities inspired to the principle of a company operating on a free market. Therefore it is forbidden to carry out any anti-competitive activity aimed to obtain a different result from the one which would be otherwise obtained by the normal functioning of the market. Therefore it is forbidden to stipulate any agreements with the competitors aimed to:

- eliminate or limit the competition in one or several geographic markets or in relation to one or several products or aimed to produce such effect;
- boycott or obtain certain behaviours or conditions from a supplier or a client or aimed to produce such effect;
- the award of a tender;
- orient, directly or indirectly the prices, or aimed to produce such effect;

#### *Protection of health or safety*

Redecam undertakes to spread and consolidate a safety culture, developing the risk awareness and knowledge and observance of legislation in force about prevention and protection, promoting and demanding some responsible behaviours by all employees – as well as by contractors and subcontractors, if specifically authorized and admitted, in the related competences – and operating to preserve and improve, especially with preventive measures, the work conditions and the workers' health and safety.

The activities of the company must be carried out in full observance of the legislation in force about prevention and protection, with particular reference to what is set forth by the applicable specific prevention legislation; the operating management must refer to advanced criteria of environmental protection and energy efficiency, improving the conditions of health and safety at work.

In order to take the required measures to protect the workers' safety and health, including the activities to prevent any professional risks, information and training activities, as well as the arrangement of an organization and the required resources, Redecam undertakes in particular to:

- eliminate any risks and, if it cannot be ensured, reduce them to the minimum in relation to the knowledge acquired thanks to the technologic progress;
- evaluate all the risks which cannot be eliminated;
- reduce the risks at the source;
- observe the ergonomic and healthiness principles at workplace in the work organization, the conception of workplaces and the choice of the work equipment, in the definition of the work and production methods, in particular in order to reduce the effects on health of the monotonous and repetitive work;
- replace what is dangerous with what is not or is less dangerous;
- program the required measures to ensure the improvement over time of the safety levels, even by adopting some codes of good behaviour and good practices;
- give the priority to the collective protection measures with respect to the individual protection measures;
- order some appropriate instructions to the workers.

#### *Environmental protection*

Redecam undertakes to observe the legislation about environment protection and take prevention measures to prevent or at least minimize the environmental impact.

For such purpose Redecam undertakes to:

- adopt the measures which limit and, if possible, eliminate the negative impact of the economic activity about environment not only when the risk of damaging or dangerous events is proved (principle of preventive action), but also when it is not certain if and in what extent the company activity exposes the environment to risks (precaution principle);
- privilege the adoption of measures which prevent any damages to the environment, instead of waiting for the moment of the repair of a damage which has already taken place;
- program an accurate and constant monitoring of the scientific progresses and development of the rules about environmental protection;
- promote the values of the training and sharing the principles of the code among all the subjects which operate in the company, at top positions or employees, so that they observe the established ethical principles, in particular when it is required to take some decisions and, later, when they must be implemented.

In particular it undertakes to:

- manage energy, water and the raw materials used in a responsible way, avoiding any wastefulness;
- regularly perform the storage and disposal of the waste generated by the implementation of the company activities, by availing itself, if required, to specialized and qualified subjects;
- privilege, if possible, the choice of suppliers and subcontractors, if they are specifically authorized and admitted, who are committed in the environmental protection;
- perform a continuous monitoring about the related legislative evolutions in order to ensure the compliance to them.

### **3\_ PRINCIPLES IN THE RELATIONS WITH THIRD PARTIES**

#### **3.1 Personnel selection**

The evaluation of the personnel who may be hired by Redecam, is carried out in accordance to the correspondence of the applicants' profiles with respect to those which are expected and to the organizational requirements, in observance of the principles of impartiality and equal opportunities for all the stakeholders.

All the personnel must be hired with a regular work contract; no form of irregular work is allowed.

In the moment when the collaboration starts, the employee/collaborator must receive some exhaustive information about the characteristics of the tasks and function, the legislative and remunerative elements and the legislation and behaviours for the management of the risks connected to health, safety and privacy protection.

He must also explicitly accept his own tasks indicated in the Code of Ethics.

### 3.2 Relations with the employees

Redecam demands that its own employees know and observe the provisions of the Code of Ethics.

The employees must notify the Supervisor Body indicated to point 4 of any breach of the Code of Ethics by colleagues, collaborators and consultants they may gain knowledge of. Redecam reserves the right to prepare any disciplinary reports following any unfounded notification which may have been made in bad faith in order to cause a voluntary damage to colleagues and/or collaborators or following omitted founded notifications.

### 3.3 Relations with collaborators

Redecam identifies and selects its collaborators with absolute impartiality, autonomy and independence of judgment, and according to the curricula and required professional figures. Redecam demands that its own collaborators know and observe the provisions of the Code of Ethics.

Any behaviours which are conflicting to the principles expressed in the Code of Ethics can be considered, by Redecam, a serious non-fulfilment of the duties of fairness and good faith in implementing the contract, reason for harming the trustworthy relation and just cause of termination of the contractual relations.

Any collaborators who maintain a relation with Redecam must avoid any situation of conflict of interest with it, with the obligation, in case of conflict, to immediately notify it to the Supervisory Body.

### 3.4 Commercial relations with clients and suppliers

On starting any commercial relations with new clients and/or suppliers and in the management of the ongoing ones, it is forbidden, on the basis of the public and/or available information in observance of the legislation in force, to establish and maintain relations with any subjects:

- who are involved in unlawful activities, in particular those which are connected to the crimes set forth in Law Decree 231/01 and, anyway, with any subjects who do not have requirements of professionalism and commercial reliability;
- who, even indirectly, behave in ways which are not respectful of human dignity and individual person and/or violate the fundamental rights of the person (exploiting the underage work, favouring the emigrants traffic or sex tourism, etc.)
- who do not observe the legislation about the workers' health and safety and, in general, all the rules contained in this Code of Ethics.

### 3.5 Relations with clients

As for the relations with clients, Redecam undertakes to behave according to the principles of professionalism, competence, helpfulness, respect and fairness.

To protect the company's image and reputation it is required that the relations with clients are based on:

- the full transparency and fairness;
- the observance of the law;
- the independence from any form of influence, both internal and external.

The contracts and notifications to the clients must be:

- clear and simple, formulated with a language which is as close as possible to that usually used by the interlocutors;
- compliant with the legislation in force, without recurring to elusive or unfair practices;
- compliant with the company commercial policies and the parameters defined in them;
- complete, so not to overlook any element which is relevant for the client's decision.

Purposes and recipients of the notifications must define, every time, the choice of the most appropriate contact channels for the transmission of the contents committing not to use any misleading or untruthful advertising instruments.

### 3.6 Relations with suppliers

All the purchases made by Redecam must be conducted with loyalty, integrity, secrecy, diligence, professionalism and objectivity of judgment, by qualified personnel who has the responsibility of their own evaluations and judgments, ensuring in the purchasing activity the observance of all the relevant legislation provisions.

The subjects who are in charge of the purchasing process:

- must respect the principles of impartiality and independence in the implementation of their tasks and functions, operating according to the adoption of objective and documentable criteria;
- must maintain relations and conduct the negotiations with the suppliers so to create a solid base for relations which are mutually convenient and appropriately lasting;
- must keep themselves free from any personal obligations toward the suppliers; any personal relation of the employees and/or consultants with the suppliers must be notified to the related direction before any negotiation;
- must not offer money, gifts or rewards, in any form; must not promise any object, service or favour to directors, auditors, managers or employees of another organization so that they make or omit any acts which concern their task, damaging their companies;
- must not accept goods or services by any external or internal subjects in exchange of the release of reserved news or the beginning of actions or behaviours which aim to favour such subjects, even in the case there are no direct impacts for Redecam;
- must peremptorily and immediately notify to the Supervisor Body any attempt or case of alteration of the normal commercial relations.

In order to ensure the maximum transparency and efficiency of the purchasing process, the company procedures must guarantee:

- the separation of duties between the organizational function requesting the supply and the function stipulating the agreement with the supplier;

- an appropriate traceability of the choices adopted;
- the conservation of information as well as all the relevant documents to manage the relation.

Any breaches of the principles defined in the Code of Ethics entail sanction mechanisms. For such purpose, the single contracts must contain some appropriate clauses to ensure the observance of the Code of Ethics within the supplies.

### 3.7 Relations with the Public Administration

The relations with the Public Administration and the Supervisor Bodies, must be conducted with the maximum transparency and fairness, in order to establish a relation of maximum professionalism and collaboration. Redecam undertakes to promptly implement any related provisions.

In particular the required relations must be maintained, in respecting the duties and functions assigned by the law, as well as in a spirit of maximum collaboration with the state administrations, in Italy or other countries. The relations with any public officials must be limited to the structures of the organization which are appointed and regularly authorized by respecting the most rigorous observance of the provisions of the law and the regulations and must not, in any way, compromise Redecam's integrity and reputation.

Any consultants or "third" subjects who are delegated to relate with the Public Administration on behalf of Redecam must follow the same rules which are indicated for the employees and the collaborators of Redecam itself.

Redecam cannot be represented in the relationships with the Public Administration by a consultant or a "third" subject when some situations of conflict of interests may take place.

The following rules of conduct must be observed toward the officials of the Public Administration and supervisor bodies:

- it is forbidden to carry out any active or passive corruption activity, or collusive behaviour of any kind and in any form within the relation of such officials:
  - for the request and management of authorizations, permissions and/or grants for any company activities,
  - on occasion of audit and inspection activities,
  - during any kind of reporting activities,
  - in concluding any commercial transaction;
- it is forbidden to offer money, gifts or any kind of utility or carry out any acts of commercial courtesy in favour of officials of the Public Administration or their relatives, unless they are utilities of modest value, given in observance of the company procedures and after an explicit authorization of the related company figures, and provided that, in any case, they cannot by any means be construed as instruments to influence the official.
- it is forbidden to propose or examine any employment and/or commercial opportunities which may ensure personal benefits to the employees of the Public Administration;

- it is forbidden to request or obtain reserved information which may compromise the integrity or reputation of both parts;
- the relations with the Judicial Authorities and the judicial police bodies must be inspired to the maximum transparency, fairness and collaboration; all the recipients refrain from adopting any reticent behaviours, omissions or behaviours which may be, even indirectly and/or unintentionally, a hindrance to the work of the Justice Bodies.

Similarly, the recipients must refrain from any pressure or threat, as well as any offer of money or other utility, in order to induce a subject not to make statements or to make false statements before a Judicial Authority.

As for the conduct related to the statements and attestations to the Public Administration, it is forbidden to use or present any statements or false documents or documents certifying untruthful things, or to omit any information to obtain, for the company's benefit or interest, contributions, funding or other disbursements of any kind granted by the State, a Public Body or the European Union.

It is also forbidden to mislead anyone with artifices or deceptions to obtain an unjust profit for Redecam causing damage to others. The breach of such prohibition is even more serious if it is the State or a public body to be misled.

#### **4\_ SUPERVISION ABOUT THE APPLICATION OF THE CODE OF ETHICS**

##### **4.1 Supervisor Body**

The Supervisory Body is autonomous and independent and ensures consulting and supervising activities about the correct application of the principles of this Code.

##### **4.2 Obligations of information**

If the subjects gain knowledge, even through third people, of illegal or ethically unfair situations, or situations which are potentially illegal or unfair, they must promptly notify the SB; the notifications can be performed in written or oral form, or by computer, and must be collected and archived by the Supervisor Body.

The SB will act so to protect the notifying people against any form of reprisal, discrimination or penalization, also ensuring the secrecy of their identity, save for any obligations of law and the protection of the rights of the people who are accused by mistake and/or bad faith.

All the notifications will be promptly checked by the SB itself which, in case of ascertained breach of the Code of Ethics, will notify the Board of Directors or Board of Auditors about it.

Any failed observance of the relevant duty of information can be sanctioned by the SB itself.

#### 4.3 Breaches

In case of breaches of the Code of Ethics, Redecam adopts, toward the People who have been found guilty of the breaches – if it is required for the protection of the company interests and in accordance with what is set forth by the legislation framework and the sanction system indicated by the model 231- disciplinary measures, which can entail the dismissal of the responsible workers according to the provisions of the related CCNL (Engineering and industry national collective labour agreement).

The breaches committed by third subjects will be sanctioned according to the criteria indicated in the relevant contractual clauses.

Redecam, in the cases of ascertained breach of the principles of the Code of Ethics which present some elements of criminal offence, reserves the right to judicially proceed against the involved subjects.