

CORPORATE CODE OF ETHICS

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1. INTRODUCTION

In carrying on its activities, SA GA S.r.l. adheres to the principles and rules of conduct set out in the present Code of Ethics and prescribed under national and international regulations currently in force, where applicable.

The organization recognizes the importance of ethical and social accountability and of safeguarding the environment in running its affairs and activities, and to this end, promotes a management of the Company aimed at balancing the legitimate interests of its stakeholders and of the community in which it operates. Accordingly, the Code is founded upon an ideal of respect for all the interests of the parties involved.

Services provided by employees and co-workers of the Company are performed according to criteria of diligence, competence, professionalism and efficiency, in such a way that all stakeholders are presented with a correct corporate image and, above all, services marked by a high level of quality.

The company also gives importance to principles of social responsibility, taking the view that human resources (employees, co-workers), members, directors, suppliers, customers, the public administration, the community and, in a broader sense, anyone involved directly and/or indirectly in the company's activities, are all stakeholders.

It is the responsibility of the Management to approve the Code of Ethics. Verifying that the Code of Ethics suitably reflects the sensitivity of the Company and ensuring its implementation and enforcement is the responsibility likewise of Management, supported by Human Resources, Quality Assurance and Administration.

2. ETHICAL VISION

The organization has made it a priority to achieve the highest standards of quality and reliability for the products and services it provides.

The achievement of this objective is made possible by the following factors:

- clear strategic vision;
- secure financial stability;
- long years of experience;
- constant search for innovation;
- vocation to customer service.

SA GA S.r.l. aims at a continuous improvement of processes, inspired by certain fundamental values, seeking:

- to operate on the principles of satisfying customer expectations to maximum effect;

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- to manage customer relations with the utmost clarity and transparency, providing all necessary technical, business and financial information, and guaranteeing continuous and prompt assistance;
- to ensure maximum respect for the individual in all internal and external activities, in the belief that ethics in occupational safety management and environmental protection must be assured in parallel with the pursuit of success in business;
- to acknowledge that human resources have a strategic role to play and must be treated with mutual respect, rejecting any form of discrimination based on age, gender, sexuality, health status, race, nationality, political opinions or religious beliefs;
- to recognize the fundamental importance of training, empowerment and involvement of all personnel at every level, while ensuring that value is placed on physical and moral integrity;
- to rationalize all areas of corporate management;
- to operate in the market abiding by fundamental ethical principles, namely honesty, impartiality and observance of all applicable rules and regulations (national and European laws, internal regulations or codes, administrative measures, duties and obligations), undertaking not to initiate or carry on any relationship with parties disinclined to align themselves with this approach.

3. STRUCTURE OF THE CODE OF ETHICS

The present Code of Ethics comprises:

- *general principles*, which define the ethical values of reference;
- *criteria of conduct*, specifically providing the guidelines and standards to which SA GA S.r.l. and its Co-workers are required to adhere;
- *methods of implementation*, which describe the system of supervision designed to ensure compliance with the Code of Ethics and its improvement.

4. COVERED PERSONS AND SCOPE

Persons covered by the Code of Ethics include all members, directors, employees and co-workers, as well as all those who may engage in exchanges or relations with the organization directly or indirectly, permanently or temporarily.

Accordingly, the company promotes the widest possible dissemination of the Code among all stakeholders, likewise the correct interpretation of its contents, and provides the tools best able to facilitate its application.

The organization also puts in place the measures necessary for carrying out verification and monitoring activities regarding application of the code.

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5 CONTRACTUAL VALUE AND BREACH OF THE CODE OF ETHICS

The rules of the Code of Ethics form an essential part of the contractual obligations assumed by personnel pursuant to articles 2104, 2105 and 2106 of the Italian Civil Code.

As stated by article 2104 of the Civil Code, entitled "Diligence of the employee": "The employee must exercise the diligence required by the nature of the required task, by the interest of the enterprise and the higher interest of national production. Employees must also comply with directions for the execution and discipline of work as given by the employer and by co-workers of the employer, to whom they are hierarchically subordinate".

As stated by article 2105 of the Civil Code, entitled 'Duty of Loyalty': "The employee shall not do business, on his/her own account or that of third parties, in competition with the employer, nor divulge information relating to the organization and production methods of the enterprise or make use of them in a manner prejudicial thereto."

As stated in article 2106, entitled "Disciplinary sanctions": "Non-observance of the provisions contained in the two preceding articles can result in the application of disciplinary sanctions, depending on the seriousness of the breach".

In effect, violation or disregard of the principles expressed in the Code of Ethics jeopardizes the relationship of trust established with the company and, depending on the case, can lead to disciplinary actions and compensation for damages, not excluding the application, where employees are concerned, of procedures envisaged under article 7 of Law 300/1970 (the so-called Workers' Statute) and applicable collective labour agreements.

Adherence to the rules of the Code of Ethics is also considered necessary in contractual relations with parties outside of the company.

6 MONITORING ENFORCEMENT OF THE CODE OF ETHICS

Firmly committed to ensuring compliance with the principles set out in the Code of Ethics, the company establishes a supervisory function, appointed internally of the organization, to which the duties of supervising, monitoring and implementing the selfsame Code of Ethics are entrusted.

The function in question is assigned the tasks, among others, of:

- promoting the implementation of the Code;
- promoting communication and specific training programmes for management and employees;
- examining reports concerning possible breaches of the Code of Ethics, promoting the most opportune verifications.

6. PRINCIPLES OF REFERENCE

6.1 Adherence to Law

Compliance with the law, transparency and propriety in management, trust and cooperation with stakeholders, are the ethical principles to which the company aspires and from which it derives its models of conduct, so that it can compete

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effectively and fairly in the market, improve customer satisfaction and develop the skills and professional growth of its human resources.

To this end, the company requires that its members, directors, employees, co-workers, agents, business partners, suppliers, contractors and anyone performing representative functions in any capacity, de jure or de facto, should comply with legislation and all current regulations and with the principles and procedures set out for this purpose, and conduct themselves in an ethically correct manner, so as not to prejudice the moral and professional reliability of the company.

The main regulatory standards for the organization are:

- Legislative Decree 81/2008 and subsequent amendments (Occupational safety)
- Legislative Decree 152/2005 and subsequent amendments (Consolidated Act on the Environment)
- European Regulation 679/2016
- Legislative Decree 231 of 8 June 2001 - "Administrative Liability of Entities" and subsequent amendments and/or additions
- Administrative regulations on human resources management
- Regulations on general obligations in labour-related matters
- National accounting standards
- Principles of good corporate governance
- Current tax regulations
- Applicable National Collective Labour Agreements
- Internal rules

6.2 Professional Integrity

Professional integrity is the fundamental principle underpinning all the activities of SA GA S.r.l., likewise all initiatives, reports and communications, and constitutes an essential element in the management and operational activity of its human resources.

Relations with stakeholders are based on criteria and attitudes of propriety, cooperation, loyalty and mutual respect. With this in mind, any form of benefit or gift, received or offered, that could be interpreted as an attempt to influence the independence of judgement and conduct of the parties involved is met with refusal.

Persons covered by this Code of Ethics are expected:

- to act loyally and in good faith, with diligence, efficiency and propriety;
- to base their conduct on mutual cooperation, always abiding by internal procedures and employing the tools provided by the company, and the time at their disposal, to best advantage.

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6.3 Transparency and completeness of information

The Company recognizes the fundamental value of correct information to members, bodies and competent functions, with regard to significant facts concerning corporate and accounting management, and in no way justifies actions by its co-workers that may obstruct or hinder inspection by the appropriate bodies or organizations.

The company encourages a continuous, precise and complete flow of information between corporate bodies, different corporate areas, management, senior figures, and where necessary, toward the Public Authorities.

In any event, information conveyed externally and internally of the organization itself will meet the requirements of truthfulness, completeness and accuracy, not least in relation to economic, financial and accounting data.

6.4 Propriety in corporate management and utilization of resources

SA GA S.r.l. pursues its corporate purpose adhering to the law and to its Articles of Association, ensuring the proper functioning of its corporate bodies, protecting the property and participation rights of its members and safeguarding the integrity of its share capital and assets.

6.5 Relations with members

SA GA S.r.l. undertakes, in accordance with the law and with its Articles of Association, to ensure that all members are informed on an equal basis, thereby encouraging their full and informed participation in the decision-making that involves them.

The company runs its activity with the satisfaction and protection of its members in view, striving to ensure that its economic performance will be such as to safeguard and increase the value of the business.

6.6 Confidentiality of Information

SA GA S.r.l. ensures the confidentiality of information in its possession, abides by regulations on the management of personal data, and refrains from seeking confidential data through illegal means.

All information at the disposal of the Company is treated with respect for the confidentiality and privacy of data subjects.

Anyone that comes into possession of information concerning the company, or relating to any stakeholder, can on no account consider themselves at liberty to disclose or use it for operational purposes outside of those authorized by the company management.

6.7 Protection of company assets

All persons covered by this Code of Ethics are singly responsible for protecting and preserving tangible and intangible corporate assets entrusted to them for the performance of their tasks, also for using such assets in a manner consistent with corporate purposes.

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It is forbidden for these same persons to make personal use of any information, property and equipment they may have at their disposal when performing the function or office entrusted to them.

6.8 Value of Human Resources

The company acknowledges the centrality of “Human Resources” as a stakeholder and the importance of establishing and maintaining relationships based on loyalty and mutual trust, valuing the capabilities of the individual as highly as possible. In this sense, Human Resources are perceived as including employees, as well as co-workers who render their services to the Company under contractual forms other than that of subordinate labour.

All employees undertake to act loyally, so as to abide by the obligations assumed in their employment contract and by the provisions of this Code of Ethics, giving assurance of the services they are asked to provide and respecting the commitments they have undertaken, not least by explicitly stating their full acceptance of this document.

The physical and moral integrity of Human Resources is guaranteed, as also are working conditions conducive to individual dignity, and a safe and healthy working environment.

Accordingly, there can be no toleration of requests or threats aimed at inducing persons to act against the law and the Code of Ethics, or to behave in a manner contrary to their moral and personal convictions and preferences.

6.9 Impartiality and non-discrimination

In decisions that influence relations with its stakeholders, SA GA S.r.l. avoids any discrimination based on the age, gender, sexual inclination, health status, race, nationality, political opinions and religious beliefs of interlocutors in the decision-making process.

The organization operates at all times with impartiality, avoiding preferential treatment in whatever circumstance.

In order to guarantee that this impartiality is applied to full effect, the organization allows no form of gift or gratuity that might be construed as exceeding normal business practices or acts of courtesy, or in any event aimed at securing favourable treatment in the prosecution of any Company activity.

The organization ensures that in the management of hierarchical relationships, authority is exercised with equity and propriety, excluding any form of abuse.

6.10 Gifts, presents and other forms of benefits

All staff members of the organization are prohibited from accepting gifts or other benefits related to their activities, other than of a modest order (maximum 150 euros, indicatively).

Persons covered by the Code must absolutely refrain from practices that are not permitted by law, custom or business etiquette.

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The company allows only gifts of a symbolic nature or of modest value, commensurate with acts of courtesy. Accordingly, any form of gift exceeding normal business practices or acts of courtesy or in any event aimed at securing favourable treatment in the prosecution of any Company activity is strictly prohibited.

6.11 Prevention of corruption and management of conflicts of interest

SA GA S.r.l. guards against all forms of conflict of interest, while acknowledging and respecting the right of its employees, co-workers, directors and members to participate in investments, business deals or other activities not among those carried out in the interest of the Company, provided that such activities are permitted by law and by contractual regulations, and compatible with obligations undertaken in the Company's regard.

A conflict between personal interest and that of the Company arises whenever an action or decision committed or made in the workplace is liable, even potentially, to give rise to a wrongful advantage for the individual or the individual's family members, at the expense of the higher corporate interest.

The Compliance Function for the Prevention of Corruption has been assigned to an external business consultant and an internal figure.

It is dedicated to a mission of:

- implementing the necessary measures for monitoring suppliers;
- promoting a culture of Risk Based Thinking;
- promoting a Prevention of Corruption culture;
- improving the performance of the entire management system, as far as its remit allows.

Due Diligence

To the end of supporting its decision-making processes and making them as efficient as possible, the Company applies practices of due diligence in relation to all categories of transactions, projects, activities, business partners and staff members, regardless of their level of risk.

By way of example, safeguards used by the company include: official published data, searches in appropriate governmental, judicial and international sources of pertinent information, checks on public exclusion lists of organizations under restrictions or banned from participating in public or governmental procurement, drawn up by national or local governments or multilateral institutions, such as the World Bank.

6.12 Product Quality and Safety

SA GA S.r.l. pursues its mission by offering quality services, on competitive terms and in compliance with all mandatory regulations. This is also demonstrated by a willingness to be certified ISO 9001.

The conduct of the Company in its approach to customer relations is one of helpfulness, respect and courtesy, offered in the perspective of a collaborative and highly professional relationship. In particular, when communicating with customers,

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the company assures the completeness, propriety and clarity of all information concerning the features, content, nature and origin of the products.

Contracts and communications addressed to customers of SA GA S.r.l. (including advertising messages) are always and will always be clear, truthful and complete.

The company ensures that products and services placed on the market are compliant with pertinent national and EU laws, activating all the necessary checks for this purpose.

6.13 Responsibility to the community and the environment

SA GA S.r.l. undertakes to manage its processes according to environmental protection and efficiency criteria, through identification, management, and control of the environmental aspects, also by using energy resources rationally and minimizing emissions, adopting a development model compatible with the territorial and environmental setting.

7. RULES OF CONDUCT

7.1 Members

SA GA S.r.l. creates the conditions for a broad and informed participation of members in decision-making.

The strategies of the organization in respect of members are designed predominantly:

- to achieve maximum transparency in relations with company stakeholders;
- to respond to the legitimate expectations of members;
- to avoid any kind of transaction that could prejudice creditors;
- to avoid any discrimination of members on the basis of gender, race, language, religion, nationality, political opinions or personal and social conditions;
- to ensure that members are able to participate fully in the corporate activity and governance of the company.

Equally, SA GA S.r.l. requires that its members adhere fully to the rules contained in the present Code of Ethics.

7.2 Corporate disclosure

SA GA S.r.l. ensures that the keeping of accounts, the preparation and drafting of financial statements, profit and loss statements, reports, prospectuses, corporate communications in general and any other items required for its operation, are accomplished in compliance with current statutory provisions, principles and technical standards.

Every operation and transaction is correctly recorded, authorized and tracked, routinely and with the aid of computerized systems, in order to facilitate the input of accounting entries, the identification of responsibility at different levels, and the accurate reconstruction of single operations, not least in order to reduce the likelihood of errors in interpretation.

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7.3 Management of financial resources in the sphere of corporate activity

Operations and transactions carried out by SA GA S.r.l. and by persons acting in the name and on behalf of the organization are in keeping with the law, with business propriety, with principles of transparency, verifiability, consistency and fairness, and must be duly authorized, documented and recorded.

The Company monitors the correct use of financial resources constantly, to the end of ensuring that no offences will be committed, and manages them according to criteria of transparency and traceability.

Outgoing financial transactions (payments) are completed on the agreed due dates, with remittance direct to the intended recipients and not in cash, except in special situations that justify a deferral or an exception for non-compliance as permitted under Article 1460 of the Italian Civil Code.

7.4 Administrative Management and financial statements

The preparation of annual financial statements and any other type of accounting documentation must comply with national primary and secondary legislation, EU regulations, and moreover, the pertinent accounting standards must be adopted in order to ensure a truthful and proper representation of the company's situation and management record.

Criteria of truthfulness, accuracy, completeness and clarity of information are of fundamental value to SA GA S.r.l. and allow all stakeholders to make clear assessments as to the economic, asset-worth and financial situation of the company. Should anyone become aware of possible omissions, falsifications, irregularities in the keeping of accounts and in basic documentation, or breaches of the principles set out in the Code of Ethics, they must inform the Prevention of Corruption function without delay.

The above noted breaches take on disciplinary importance and are suitably penalized.

7.5 Human Resources

7.5.1 Personnel Selection

The assessment and selection of personnel for recruitment is carried out based on the extent to which the profiles of candidates correspond to those expected, and on the needs of the Company, observing principles of impartiality and equal opportunities for all interested parties and avoiding any form of favouritism, patronage or nepotism. All decisions taken in the area of human resources management and development are based on considerations of profiles indicating merit and/or of matches between expected profiles and the profiles of individual co-workers. The same applies for access to sundry roles or appointments.

7.5.2 Human Resources Management

Any form of discrimination against individuals is forbidden.

In the management of hierarchical relations, authority is exercised with equity and propriety, avoiding any abuse.

It is an abuse of a position of authority to request services or personal favours, or to invite any behaviour constituting a breach of this Code, as an act of deference to a hierarchical superior.

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Human resources are fully valorized through activation of the mechanisms available to them for fostering their development and growth.

Accordingly, the competent functions are required:

- to select, recruit, train, remunerate and manage employees or co-workers without any form of discrimination;
- to create a working environment in which personal character traits cannot give rise to discrimination;
- to adopt criteria of merit, competence, and in any event of a strictly professional nature, in making any decision that concerns an employee or co-worker;
- to ensure a healthy and safe work environment for all employees, members and co-workers;
- to inform all employees and co-workers regarding all statutory, contractual and regulatory provisions and all operational and safety practices.

7.5.3 Health and Safety

SA GA S.r.l. promotes and spreads a culture of safety, developing awareness of risk management, not least through specific training, promoting responsible behaviour and preserving the health and safety of all employees and co-workers, especially through preventive actions.

All employees, co-workers and partners are expected to exercise meticulous observance of the rules and obligations deriving from pertinent health and safety legislation, and similarly to abide by all health and safety measures set out in internal procedures and regulations.

7.5.4 Information Management and Privacy

The privacy of employees, co-workers, agents, partners, directors and members and the confidentiality of information is protected in accordance with pertinent legislation, and by compliance with operational standards specifying the information received and the relevant methods of processing and storage, as set out in the security policy document, which must be adhered to conscientiously by all personnel. There can be no inquiry into the ideas, preferences, sexual inclinations and personal tastes of individuals, or into their private life and state of health.

7.6 Duties of Human Resources

7.6.1 Obligations of Conduct

Every employee, director, member and co-worker engaged in whatever capacity at SA GA S.r.l. is expected to be familiar with the rules contained in the Code of Ethics and with pertinent rules governing the activity carried out within the scope of his or her function, deriving from legislation or from internal procedures and regulations.

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Every employee, director, member, agent and co-worker engaged in whatever capacity at SA GA S.r.l. must also indicate explicit acceptance of their commitments deriving from this Code of Ethics, at the moment of entering into a relationship of employment or when the Code of Ethics is first circulated.

In particular, each of these individuals is under obligation:

- to familiarize themselves with the provisions and rules contained in the Code of Ethics and refrain from conduct contrary to them;
- to contact their superiors or internal relations officers should they need clarification as to how the rules are applied;
- to apprise superiors or internal relations officers promptly of any episode, whether observed directly or reported by others, regarding possible breaches of the Code or a simple request for a breach to be made;
- to cooperate with structures appointed to verify possible breaches;
- to inform any third party with whom they come into contact when at work, giving a suitably full account, as to the existence of the Code of Ethics and the commitments and obligations it imposes on external parties;
- to insist on the observance of obligations that directly affect their activities;
- to take the appropriate internal initiatives, and external initiatives if within their competence, in the event of failure by third parties to fulfil the obligation of compliance with the Code of Ethics.

7.6.2 Information Management

Employees, co-workers, partners, directors and members are expected to be familiar with the content of the security policy document and to implement the intentions expressed by the policies of the Company with regard to information security, in order to guarantee its integrity, confidentiality and availability.

It is the obligation of every employee, co-worker, partner, member and director to ensure the confidentiality, as dictated by the circumstances, of each new intelligence they acquire due to the nature of their work.

In this regard, it is reiterated here that anyone who, for whatever reason, may come into possession of information concerning the company or relating to any stakeholder, must keep such information confidential and can in no way consider themselves at liberty to divulge it or put it to any use other than the operational purposes for which authorization was given by the company management.

Obligations of confidentiality under the Code of Ethics continue to apply even following termination of employment and/or of contractual relations, since the disclosure of confidential information can damage the activities of the company, its customers and its business partners at any time.

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7.6.3 Conflicts of Interest

Every employee, co-worker, director and member of SA GA S.r.l. is expected to avoid all situations and all activities that could give rise to a conflict with the interests of the Company, or could interfere with their ability to make decisions impartially, in the best interests of the company and in full compliance with the rules of the Code of Ethics.

Any situation that could constitute or give rise to a conflict of interest must be reported promptly to a superior or internal relations officer by the employee, co-worker, director or member concerned.

In particular, all employees, co-workers, directors and members of SA GA S.r.l. are expected to avoid conflicts of interest between personal and family business activities and the positions they hold within the structure to which they belong.

By way of example, but implying no limitation, the following situations give rise to conflicts of interest:

- performing functions or having economic or financial interests in the activities of suppliers, customers, competitors or business partners;
- using one's position in the Company, or information acquired as part of one's job, in such a way as to create a conflict between one's personal interests and those of the Company;
- engaging in work activities of any kind for customers, suppliers or competitors.
- offering or accepting money, favours or benefits to or from persons or companies currently in or intending to enter into business relationships.

7.6.4 Utilization and safeguarding of Company property

Every employee, co-worker, agent, partner, member and director of SA GA S.r.l. is expected to act with due care and diligence in protecting property owned by the Company, conducting themselves responsibly and in line with the operating procedures drawn up to regulate the use of such property, and documenting its use where appropriate.

All employees, co-workers, agents, partners, members and directors of SA GA S.r.l. are responsible for safeguarding the resources entrusted to them, and duty bound to inform the appointed structures promptly of any threats or events of a nature damaging to the Company or to its property.

In particular, every employee, co-worker, partner, member and director of SA GA S.r.l. is under obligation:

- to avoid improper uses that might cause undue costs, damage or reduced efficiency, or in any event prove contrary to the interests of the Company;
- to take every precaution, when using means of communication made available by the Company (PCs, land-line and mobile phones, web connection tools, etc.), that will prevent any form of use contrary to the law and to the internal regulations of SA GA S.r.l.; in cases where the means of communication in question are used for purposes other than those approved contractually, formal authorization from the Company is required;
- to ensure that the rules of policies and of internal procedures are adopted conscientiously, so as not to compromise the functionality, protection and security of IT systems, and of other systems and equipment used by the Company;

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- to operate unfailingly in compliance with the safety rules prescribed by law and by internal procedures, so as to prevent possible damage to property, persons or the environment;
- to observe and conscientiously abide by the indications on company signage regarding access and the use of Personal Protective Equipment;
- to utilize property belonging to the Company, of whatever type and value, in accordance with the law, with internal regulations and with the principles of this Code of Ethics;
- to utilize Company property exclusively for purposes connected with and instrumental to the needs of the job; it is forbidden in any event, except when permitted by specific regulations or company agreements, for property to be utilized or transferred by third parties, or to third parties, even temporarily;
- to operate, as far as possible, in such a way as will reduce the risk of theft, damage or other threats to property and resources allocated or on hand, informing the appointed functions in a timely manner should abnormal situations arise.

7.7 Customers

7.7.1 Code of conduct toward customers

The conduct of the Company in its approach to customer relations is one of helpfulness, respect and courtesy, offered in the perspective of a collaborative and highly professional relationship.

SA GA S.r.l. pursues its mission by offering quality products/services, on competitive terms and in observance of all regulations put in place for the protection of fair competition.

Employees, co-workers, partners, members and directors of SA GA S.r.l. are under obligation:

- to provide products or services of high quality that meet the reasonable expectations and needs of the customer, within contractual limits, acting efficiently, courteously and promptly;
- to provide accurate and comprehensive information concerning the company's products or services, where necessary and in the manner and form expressed in company policies, so that the customer can make informed decisions;
- to meet customer expectations in terms of honesty, transparency and full compliance with the law and with contractual agreements;
- to maintain truthfulness in advertising or other communications.

Customer relations are inspired by the principles of propriety, good faith, transparency, professionalism and efficiency. The goal of achieving increasingly high levels of customer satisfaction is dependent on:

- a constant search for the right balance between cost-effectiveness and the quality of service provided;
- the preparation of personnel in such a way that enquiries and requests are handled expertly and courteously;

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- the explicit rejection of any relationship with criminal or mafia organizations and with persons who engage in unlawful conduct.

7.8 Suppliers

7.8.1 Selection of suppliers and contractors

The selection of suppliers and contractors and the determination of purchasing conditions are made on the basis of objective parameters, namely quality, affordability, price, capacity, efficiency, ethical values and compliance with the law.

Accordingly, fundamental requirements for SA GA S.r.l. are:

- professionalism of the counterpart;
- availability, suitably documented, of adequate means, not least financial, organized structures, planning capabilities and resources, know-how, etc;
- existence and effective implementation of quality, safety and environmental management systems;
- adoption of environmentally friendly conduct and sustainability policies;
- adoption of conduct that does not reflect negatively on the image and good name of the company.

In matters of contracting, procurement, and in general the supply of goods and services, SA GA S.r.l. seeks:

- when selecting suppliers, to adopt the evaluation criteria envisaged in existing procedures, objectively and transparently, and before a choice is made, requesting documentation that shows the technical and professional skills of candidates, their fulfilment of contribution and legal obligations, and their equipment levels in terms of technical instrumentation and safety in the workplace;
- not to preclude anyone, in possession of the required attributes, from competing for contracts, adopting objective and documentable criteria in the selection of candidates;
- to ensure an appropriate level of competition when organizing any tender or call for bids; any departures from procedure must be authorized and documented;
- to observe contractual conditions and verify full compliance with them over time;
- to maintain a frank and open dialogue with suppliers, in line with good business practices;
- to observe and expect compliance with all obligations imposed by current legislation, with regard to the environment, safety, public procurement, social security and tax payments;
- to ensure the transmission of all the necessary information that will guarantee services are performed in full compliance with mandatory regulations.

Suppliers are required:

- to maintain observance of the law in general;

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- to comply with the principles of this Code of Ethics;
- to ensure compliance with current labour legislation, giving particular attention to child labour and to the provisions of legislation regarding occupational health and safety, and environmental matters;
- to refrain from giving any kind of support to mafia or terrorist associations, whether directly or indirectly;
- to abide by anti-corruption and anti-trust guidelines.

7.8.2 Safeguarding ethical aspects of procurement

With a view to bringing the procurement of goods and services into line with ethical and environmental principles of reference, SA GA S.r.l. may ask that social and/or environmental requirements be met for particular supplies. To this end, single contracts may be drafted with special clauses included.

7.9 Environment and safety

SA GA S.r.l. considers issues connected with the environment and with occupational safety to be of high importance..

To this end, the company takes environmental protection and energy efficiency into account in the management of its business activities, pursuing the improvement of conditions in the areas of health and occupational safety.

Through the active cooperation of its employees, co-workers, agents, directors, members, partners and external service providers, in particular, SA GA S.r.l. also:

- promotes and implements every reasonable initiative aimed at minimizing risks and removing causes that might jeopardize the health and safety of individuals, excluding any form of exception to or departure from the internal procedures adopted for this same purpose;
- gives continuous attention and commitment to improving its environmental performance, minimizing its negative impact on the environment and making informed and responsible use of natural resources;
- works together with its stakeholders, both internal (e.g. employees) and external (e.g. institutions), to the end of optimizing the management of Health, Safety and Environment profiles;
- maintains high standards of safety and care for the environment, in compliance with current legislation;
- adopts a policy of using products that are compatible with care for the environment and with the safety of workers;
- transmits and asks to be provided with all information, documentation and certifications necessary to ensure full compliance with mandatory regulations, with particular reference to safety and hygiene in the workplace, care for the environment, and proper management of labour relations.

Decisions on occupational safety and health are taken by the Company based on a number of fundamental principles and criteria set out in pertinent international and national regulations and, in particular, in Legislative Decree 81/2008 and subsequent amendments. These principles and criteria can be summarized as follows:

- avoidance of risks;

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- assessment of risks that cannot be avoided;
- tackling risks at source;
- adaptation of work to human capabilities, for example in the design of work stations, in the selection of equipment and of working methods;
- taking into account the degree to which engineering has evolved;
- replacing what is dangerous with what is not dangerous or is less dangerous;
- planning prevention, aiming at a consistent whole, integrating technology, organization of labour, working conditions, social relations, and the influence of factors related to the work environment;
- prioritization of collective protection measures over individual protection measures;
- providing workers with full and proper instructions;
- preparation of a detailed two-way training and information system involving employees, co-workers, agents, members, directors, corporate bodies, partners, contractors and suppliers generally;
- in any event, depending on the particular nature of the work, on experience and on technical factors, ensuring the adoption of all measures necessary in order to protect the physical integrity and moral personality of workers.

7.10 Community

Aware as to the effects of its activity on the setting in which it operates, on economic and social development and on the general well-being of the community, SA GA S.r.l. is careful in its actions to reconcile the interests of others.

SA GA S.r.l. believes that dialogue with stakeholders is of strategic importance to the sound growth of its business and, where possible, maintains a stable channel of communication with the associations representing its stakeholders, in order to enable cooperation in accordance with mutual interests.

7.11 Relations with public Institutions

Relations with public, local, national and international institutions are restricted exclusively to the functions and offices duly appointed for the purpose.

SA GA S.r.l. undertakes to establish stable channels of communication, refraining from any discrimination of whatever nature, with all institutional stakeholders at local, national and EU level.

Such relations must always be guided by criteria of maximum transparency and propriety, rigour and consistency, avoiding attitudes of a collusive nature.

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7.12 Relations with political and trade union organizations

SA GA S.r.l. makes no contribution to parties, movements, political and trade union committees and organizations, or to their representatives and candidates.

7.13 Relations with non-profit organizations

SA GA S.r.l. looks favourably on, and where appropriate, provides support to social and cultural initiatives aimed at promoting the individual and improving quality of life, subject to the approval of the company managers.

7.14 Media Relations and spread of Information

Relations with the press, communication and information media, and external interlocutors more generally, must be conducted only by persons expressly appointed for the purpose, in accordance with procedures and policies adopted by the Company.

Communications with external parties are governed by the guiding principles of truthfulness, propriety, transparency and prudence, and aimed at favouring awareness of the Company's policies, programmes and projects.

Relations with the mass media are based on these same principles and restricted exclusively to the office of the Chair, which manages them in accordance with the policies adopted by the Company.

Employees, co-workers, directors and members can neither provide information to outside parties, nor undertake to provide it, without the authorization of the Chair.

In no shape or form can employees, co-workers, agents, directors or members offer payments, gifts, or other benefits that are aimed at influencing the professional activity of mass media functions, or that can reasonably be interpreted as such.

7.15 Relations with contracting clients

In its relations with contracting clients, SA GA S.r.l. guarantees observance of the principles of propriety, honesty and transparency in commercial and contractual negotiations.

The company strives constantly to ensure an increasingly high degree of satisfaction to contracting clients.

7.16 Relations with users

SA GA S.r.l. conducts its business while pursuing the objective of maximum user satisfaction. All company operators connected with the organization are committed to ensuring a high-quality service both from a purely technical and operational standpoint and in terms of relations with users.

Through its public relations offices, SA GA S.r.l. also guarantees to provide users with appropriate and comprehensive information on how services are provided.

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7.17 Relations with competitors

SA GA S.r.l. strictly forbids the use of violence or fraudulent means in order to impede or disrupt the operation of an industrial or trade activity. In relations with competitors, the company avoids and condemns any act of unfair competition and undertakes not to engage in conduct liable to damage other operators, aware of the serious detrimental effects that can derive from a breach of the laws protecting fair competition, which include long-term reputational damage.

7.18 Public Administration

Relationships pertaining to the dealings of the Company with public officials or public service officers (those operating on behalf of the Public Administration, central and peripheral, or of legislative bodies, of EU institutions, of international public organisations and of any foreign state), with the judiciary, with public supervisory authorities and with other independent authorities, as well as with private partners holding a concession on a public service, must be undertaken and managed in absolute and strict compliance with current statutory and regulatory requirements, and with the principles stated in the present Code of Ethics, so as not to compromise the integrity and reputation of either party. To this end, the undertaking of commitments with Public Administrations and Public Institutions is restricted exclusively to the appointed and authorized functions, which will fulfil them in due compliance with the law and with the principles of this Code of Ethics.

SA GA S.r.l. prohibits its employees, co-workers, members, partners, directors or representatives, and more generally all those working in its interests, in its name or on its behalf, from accepting, promising or offering money, gifts, goods, services or favours that are not due (including employment opportunities), even indirectly, in the context of relations with public officials, officers of a Public Service or employees, generally speaking, of the Public Administration or of other Public Institutions, or private parties, in order to influence their decisions with a view to securing more favourable treatment or unwarranted services or for any other purpose.

Any employee, co-worker, agent, member or director who receives requests for or offers of money or favours of any kind, directly or indirectly (including, for example, gifts or presents of more than modest value), made improperly either to or by those who work on behalf of SA GA S.r.l. in the context of relations with public officials, officers of a Public Service or employees, generally speaking, of the Public Administration (Italian or of other foreign countries), or with other Public Institutions, or with private parties (Italian or foreign), must report the matter immediately to the competent internal function for the adoption of the appropriate measures.

Any relationship with institutions of the State or with international institutions is therefore concerned strictly with forms of communication serving to perform the activity of responding to enquiries.

7.19 Funding management

When applying for and managing subsidies, contributions and funding of whatever nature obtained from the state, from other public bodies or from the European Union, SA GA S.r.l. expects its employees, co-workers and directors to comply with the principles of legality, transparency and propriety.

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To this end, SA GA S.r.l. and its employees, co-workers, members and directors, and representatives acting in whatever capacity, are under obligation:

- to operate through the communication channels designated for this same purpose, engaging with institutional counterparts at national and international, European and territorial level without making any kind of discrimination;
- to represent the interests and positions of the Company with transparency, rigour and consistency, avoiding attitudes of a collusive nature;
- to avoid falsifications and/or alterations of statements or documentary data aimed at obtaining an unfair advantage or any other benefit for the Company, and avoid any use of public funds for purposes other than those for which they were obtained;
- to carry out a meticulous verification of data contained in declarations made to public bodies.

The company and its employees, co-workers, members and directors undertake in any event to report any knowledge that may come to their attention of conduct contrary to the above noted principles, even if displayed by competitors and/or partners.

For receipt, acceptance and acknowledgement
