

ETHICAL CODE

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INTRODUCTION

INTAV S.r.l. has the conviction that the business Ethics is a condition for succeeding and a tool for the promotion of its own image. This latter is a representing element with a primary and essential value for the Company. The rules contained in this document have as fundamental assumption the respect of each law regulation and the adoption of a fair and ethically correct conduct, on which are based the actions of all the Company Representatives and of everyone cooperating with the Company, in any guise and with any function, even if occasionally, considering also the accordance with the Legislative Decree 231/2001, through which have been introduced in our Jurisdiction the terms of penal responsibility to which the Company could be exposed in the event of committing an offence with the purpose of pursuing the obtainment of its own interests or advantages.

PRINCIPLES AND NORMS

1. Each Company Representative, in the course of performing his jobs, must respect the principles of moral correctness, good faith, transparency, fairness and loyalty, both towards his colleagues and third parties he relates with.
2. No Company Representative can solicit or accept money, goods, services or benefits neither in the name of/or on behalf of the Company nor for personal benefits, coming from Companies or Institutions, or collaborators of theirs, with the purpose of inducing, remunerating or influencing any action or event in the interest of the Company.
3. No Company Representative is allowed to solicit or accept money, goods, services or benefits of any kind coming from suppliers or customers, linked to his tasks, person or activities of the Company.
4. What has been established at points 2. and 3. is valid for relationships with people, companies or entities both having private nature and public, both in Italy and abroad.
5. Notwithstanding the foregoing at points 2. and 3., little gifts or courtesies are allowed, provided that there's a conformity to the local habits and not a law prohibition. Such derogations must be expressly authorised by the Supervisory Body.
6. No Company Representative is allowed to dispense in the name of the Company any financing or contribution to political parties, organisations, or political candidates.

7. In execution of the fidelity and loyalty duties previously assessed, each Company Representative must abstain from carrying out any activity or pursuing any interest conflicting with those of the Company.
8. Each Company Representative must abstain from divulging or using for his own profit or the one of third parties any private news or information pertinent to the activities of the Company; this latter prescription is particularly related to the fact that privacy is considered a fundamental Company Asset towards its Customers.
9. The forbidden activities as stated at points 2., 3., 6., 7. and 8. can't be pursued not even indirectly (for instance through family people, consultants as well as middlemen). Furthermore, it is forbidden any activity which, in any guise and with any function (for instance sponsors, engagements, consultancies, advertising), gets the same aims forbidden at points 2., 3., 6., 7., and 8.
10. Each Company Representative receiving requests or acquainting with facts contrary to the bans at points 2., 3., 6., and 8. must immediately inform his superior.
11. In carrying out activities, each Company Representative must avoid any conflict of interest or any activity pursuing a different interest than the one of the Company or one through which the Company Representative achieves personal advantages, for his own behalf or the one of third parties, by using the opportunities coming from the Company. Each Company Representative believing to be in a conflicting situation between his own personal interests – on his own behalf or on behalf of third parties – and the interests of the Company, must immediately notify the Company.
12. Company Representatives and other people or entities having the real chance to influence the choices of the Company must avoid to use their position in their own favour or in the favour of relatives, friends and acquaintances to aim at personal purposes of any kind.
13. INTAV S.r.l. does not employ any form of forced, mandatory or child labour, namely it does not employ people younger than the permissible age for working established in the legislation of the place in which the work is carried out and, in any case, younger than fifteen, unless an exception is expressly provided by international conventions and by local legislation. INTAV S.r.l. is also committed to not establishing or maintaining working relationships with suppliers that employ child labour, as defined above.
14. INTAV S.r.l. employees are free to join a trade union in accordance with local law and the rules of the various trade union organisations. INTAV S.r.l. acknowledges and respects the right of its Employees to be represented by a trade union or other in freely elected union representatives in compliance with laws and local policies in force.
15. INTAV S.r.l. is committed to providing equal opportunities to all its employees, both on the job and in their career advancement. The head of each department shall ensure that, in all the aspects of job relations such as recruitment, training, salary, promotion, assignment of roles, responsibilities and objectives, assessment of performance, transfer and termination of employment, employees shall be treated according to their abilities to meet job requirements, avoiding any form of discrimination and, in particular, discrimination based on race, gender, age, nationality, religion and personal beliefs.
16. INTAV S.r.l. considers absolutely unacceptable any type of harassment or unwanted behaviour, like those connected to race, to gender, or to other personal characteristics having the aim and the effect to violate the dignity of persons to whom such harassment or behaviours are aimed, both within and outside the work place.

17. Employees shall spare no effort in maintaining a good working environment in which the dignity of each person is respected. In particular, INTAV S.r.l. employees: may not serve under the effect of alcoholic or narcotic substances; where smoking is not forbidden by the law, they shall be susceptible to the needs of those suffering some discomfort due to the effects of “passive smoking” in the workplace; they shall avoid behaviour causing an intimidating or offensive environment for colleagues or subordinates aiming at marginalisation or discredit in the workplace.
18. Salaries or benefits with which INTAV S.r.l. Employees are granted satisfy at least the established law requirements. Concerning working time and paid leave, INTAV S.r.l. shall adhere to the legislation in force and to the practices of the country in which it operates.
19. On INTAV S.r.l. Employees is imposed the ban of accepting or solicit promises or payments of money, goods, benefits, pressure or services of any kind that could be intended to promote the recruitment, transfer, or promotion of an employee.
20. INTAV S.r.l. recognise health and safety at the workplace as a fundamental right belonging to its Employees. All the decisions made by INTAV S.r.l. shall respect health and safety in the workplace. INTAV S.r.l. adopts and will be continuing to improve a health and safety policy in the workplace, based on preventive measurements, of individual and collective nature, in order to reduce at the minimum the risk of injuries at the workplace. INTAV S.r.l. intends to ensure excellent work conditions at the industrial level, in accordance with hygiene principles, industrial ergonomics and individual organisation and operative processes. INTAV S.r.l. believes in spreading a culture of prevention of incidents and of awareness of the risks among workers promoting it in an active way, in particular through suitable information/training courses. Employees shall be considered personally responsible for the adoption of preventive measurements established by INTAV S.r.l. concerning the protection of their own health and safety, which will be notified through specific directives, instructions, training and information. Each employer is responsible for the adequacy of the safety management and shall not expose himself or other workers to dangers possibly causing injuries or endangering themselves.
21. INTAV S.r.l. considers the environment protection as a factor key to promote the general approach of the Company activities. INTAV S.r.l. is committed to continuously improve the environmental performance of its production processes and to act accordingly to the main law and rule requirements concerning these issues. INTAV S.r.l. incentives and encourages its Employers to actively participate in the execution of these principles by spreading information and by regular training courses and it expects that Employers play an active role in the execution of such principles in their work tasks.
22. INTAV S.r.l. is committed to produce and sell – by fully respecting the law and rule requirements – products responding to the highest standard in terms of environmental performance and safety. Furthermore, INTAV S.r.l. is concerned for developing and implementing innovative technical solutions able to reduce at the minimum the environmental impact and to safeguard security at the highest level.
23. For anything which is not expressly provided in the previous articles, please refer to the applicable law rule.

INDICATIONS FOR METHODS OF EXECUTION AND CONTROL

Application Area of Ethical Code

This Ethical Code is addressed to all Company Representatives, with no exception, and to all those who, directly or indirectly, permanently or temporarily, establish relationships with INTAV S.r.l. and cooperate to reach its goals.

Each Company Representative is obliged to respect this Ethical Code, by considering this aspect of the utmost importance to pursue a company pattern ethically responsible.

The Company Representatives of INTAV S.r.l. have therefore the obligation of being aware of the norms, to abstain from behaviours contrary to them; questioning a Superior to receive clarifications or to complain; cooperating with the dedicated structures to verify the violations; not hiding to the counterparts the existence of an Ethical Code. In business relationships, the counterparts shall be informed about the existence of norms of behaviour and they must respect them.

The violation of the rules of this Ethical Code might compromise the trust relationship between INTAV S.r.l. and the Company Representative which has committed the violation, with the addition of all the law consequences concerning the relation with the Company. The observance of the norms of the Ethical Code is to be considered as an essential part of the contractual obligations of all the employers according to the Article no. 2104 of the Italian Civil Code.

INTAV S.r.l., through its Company Representatives, commits itself to cooperate with judicial authorities, to favour a company culture characterized by the awareness of the existence of control systems and by the mentality accustomed to the application of the control. INTAV S.r.l. commits itself, furthermore, to deepen and update the Ethical Code, with the aim of adapting it to the evolution of civil sensitiveness and to the relevant rules for the Code itself.

In particular, the management is due to observe the Ethical Code when proposes and realises its projects, actions, investments of the company and the enterprise goals. All those in position of responsibility in INTAV S.r.l. are indeed due to be an example for their employers, to address them to the observance of the Ethical Code and to favour the respect of the rules.

Supervisory Board responsible for Monitoring

To HR Department (INTAV S.r.l.) is assigned the task of supervisory and monitoring regarding the implementation of the Ethical Code, by particularly taking care of:

- Constantly monitoring the application of the Ethical Code of the interested parties, also by accepting eventual recommendations and suggestions;
- of reporting eventual violations of the Ethical Code particularly significant;
- of expressing binding opinions regarding the eventual review of the Ethical Code or of the most relevant procedures and company policies, in order to ensure their coherence with the Ethical Code itself.

Communication and spreading of the Code of Ethic Conduct

INTAV S.r.l. commits its self to favour and guarantee a suitable knowledge of the Code of Ethic Conduct and to spread it – by employing all the means considered the most appropriate and suitable – among all the interested parties through apposite and adequate spreading and communication activities.