

Code of Conduct



*Document approved on January 11th, 2016 by the
Company's Board of Directors*

This Code of Conduct has been edited by the Human Resource Management in accordance with Board of Management to ensure that the Eurofork S.p.A.'s basic ethical values are clearly defined and constitute the cornerstone of the political behavior of all employees, cooperators and business consultants, in conduct of its affairs and activities.

Eurofork S.p.A. is committed to promote the values, ethical principles and rules of conduct contained in this Code, in the way it deems most appropriate and effective.

The Code of Conduct is available on the website www.eurofork.com from which is freely downloadable.

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Art. 1. Introduction, general aspects

- This document defines the values, ethical principles and rules of conduct relating to the efficient operation, reliability, compliance with laws and regulations as well as the image of Eurofork S.p.A. (Hereinafter "Eurofork" or the "Company").
- This document contains a set of rights, duties and responsibilities of internal and external parties of the Company, beyond and independently from the provisions of regulations.

Art. 2. Recipients

- All parties who operate on the achievement of corporate goals, whether they are employees and/or co-workers and/or external consultants and/or suppliers and/or business partners, are required to comply with this Code in conducting business and corporate activities.
- They must adopt an attitude based on the respect of the fundamental principles of honesty, integrity, transparency, fairness, objectivity and respect for the individual personality in the pursuit of corporate goals and in all relationships with individuals and / or organizations, internal and / or external to the Company.
- Under any circumstances, the pursuit of Eurofork cannot justify a non-compliant operate and a dishonest line of conduct.
- Consequently, Eurofork reserves the right not to undertake and / or continue any relationship with anyone adopts conflicting behaviors and / or different behaviors from the provisions of the Code of Conduct.

Art. 3. Entry into force

- The Code of Conduct was approved on 11/01/2016 by the Company's Board of Directors.

Art. 4. Publication and distribution of the Code

- The Code of Conduct is available on the website www.eurofork.com from which is freely downloadable.
- New employees will receive a dossier containing a copy of the Code of Conduct.
- Consultants, suppliers, partners and anyone who carries out activities for Eurofork, will receive a copy of this Code of Conduct by electronic mail.

Art. 5. Updates

- The update of this Code is delegated to the General Management, after consultation / proposal by the Board of Directors who, at the first meeting, provides for the ratification of the above.

Art. 6. Ethical principles and values

- Hereinafter the definition of the ethical principles to which Eurofork adheres and the values that inspired to orient their strategies, their choices and their daily activities.

Legality

- Eurofork is committed to work in full compliance with laws and regulations in force in the countries in which it operates. Eurofork does not implement any conditioning which may in any way affect the statements to be made to the judicial authorities.

Fairness and transparency

- Eurofork intends to base its relations with all parties concerned in accordance with the principles of fairness and transparency, avoiding misleading communications and behavior designed to take unfair advantage of another's weakness positions and / or unawareness.

Customer orientation

- Eurofork is oriented to achieve the satisfaction of its customers by committing to establishing with them extremely loyal and collaborative relationships and proposing itself them as a reliable partner with more than 20 years of know-how in the industry.

Technological innovation

- Eurofork considers investments for technological innovation as fundamental and indispensable elements necessary to strengthen its competitiveness and to build its own future in the more than 30 countries, in which it currently operates.

Flexibility

- Eurofork consider that to fit with extreme flexibility to dynamic market in which it operates is an essential element of its business and a necessary condition for success.

Knowledge sharing - Best Practice

- Eurofork encourages team spirit, believe in the sharing of experiences (Best Practice) and in enhancing human resources through the contribution of each individual as a means to achieve its goals.

Respect for individuals

- Eurofork, by applying what recognized by the Universal Declaration of Human Rights of the United Nations recognizes as cardinal principle of its identity and its actions the respect for the individual, his dignity and his values and reject all forms of intolerance, violence and discrimination, whether based on gender, race, nationality, age, political opinions, religious beliefs, sexual orientation, state of health, economic and social conditions.
- Eurofork is committed to ensure and maintain healthy work environments, serene, safe and functional, allowing everyone to express the best of its human and professional qualities.
- Eurofork ensures full respect of national and supranational rules governing employment relationships.

Merit and equal opportunities

- Eurofork undertakes to offer the same work opportunities to its employees and / or contractors and / or external consultants and / or to all those who intend to join it, and to ensure a recruitment system, management and personnel development solely based on merit criteria, free from favoritism, benefits and / or any type or form of discrimination.

Health protection and safety workplace

- Eurofork considers health and safety in the workplace as a paramount importance issue. In this sense Eurofork strives to ensure the respect of national and supranational legislation, promoting initiatives to spread and consolidate the culture of safety in the workplace.

Sustainability

- Eurofork focuses the environment concerns at the center of its strategies and it is committed to work in compliance with national and international legislation in force and aimed to adhere to a model of sustainable development, by ensuring the minimization of environmental impact, maximum energy efficiency, the reduction and recycle of waste and the reduction of polluting emissions.

Responsibility towards society

- Eurofork commits itself to promote an ongoing relationship of dialogue and collaboration with the local communities in which it operates. In this particular case, it is actively engaged in cooperation with Institutions, Schools and Universities, tightening relations of mutual and fruitful cooperation.

Art. 7. Criteria of conduct in relations with employees and collaborators

- Human resources are an indispensable element for the existence, development and success of a business. For this reason, Eurofork protects and promotes the value and the development of human resources, considering it is a significant factor of success for the Company, so as to facilitate, on the basis of merit, the full professional realization.
- Concerning relations that involve the establishment of hierarchical relationships, Eurofork requires that authority is exercised fairly and correctly, by prohibiting any behavior that might be detrimental to the dignity and autonomy of the employee, contractor or consultant.
- The workplace, in addition to its suitability from the point of view of health and safety, promotes mutual cooperation and team spirit, in the respect of individuals morality, and it is free from prejudice, intimidation, illegal and any form of conditioning.
- All forms of discrimination must be avoided and, in particular, any discrimination based on race, nationality, sex, age, disability, sexual orientation, political opinions or trade union, philosophical or religious beliefs addresses to any internal and / or external party.
- Sexual harassment and / or acts of physical and / or psychological violence are not tolerated
- Eurofork undertakes to safeguard the moral integrity of human resources and to guarantee the right to work in the respect of individuals dignity.
- Any form illegal labor is not accepted.

Art. 8. Confidentiality and privacy protection

- Eurofork pays particular attention to the execution of requirements in terms of protection of personal data regulated by the Legislative Decree. no. 196/03.
- At the beginning of an employment relationship, every employee shall receive accurate information about the characteristics of his function / department, responsibility for his own role and tasks to be performed, regulations and salary, rules and procedures to be observed in order not to act by contrasting law and Company policies.
- The staff should avoid creating or facilitating actions involving actual or potential conflicts of interest with the Company, the less activity that interferes with the ability to take decisions in the best interest of the Company, and in compliance with this Code.
- The staff, in particular, should not have any financial interest in choosing a supplier, a competitor or a customer and cannot carry out working activities that could create conflict of interest. For anything not listed above, please refer to Confidentiality Agreement.

Art. 9. Criteria of conduct in relations with suppliers

- With regards to tenders, procurement and, generally, to the supply of goods and services, it is forbidden, on the base of public information or information available in accordance with law in force, to establish and maintain relationships with:
 - parties involved in illegal activities, in particular related to crimes recognized by Legislative decree 231 / 2001, and in any case parties without the necessary seriousness and reliability requirements;
 - parties who, even indirectly, obstruct human development and contribute to not respect human dignity and to violate the fundamental rights of the individual;
 - with parties that do not respect the law in force about to employment, with particular attention to child labor and health and safety of workers, and more generally of the principles laid down in this Code of Conduct.
- it is also forbidden:
 - to provide services to the partners that are not adequately justified in the context of the relationship established with them.
 - to pay fees to external consultants who cannot find adequate justification in the activities to be performed.

- The relationship with suppliers is based on principles of transparency, fairness, integrity, confidentiality, professionalism and objectiveness of judgment.
Staff responsible for purchasing processes ensures compliance with all relevant regulations.
- Eurofork recommends its suppliers to refrain from offering goods and services, (particularly in the form of gifts) to the Company's employees that exceed the normal standards of courtesy and also advises its employees not to offer goods and services, (particularly in the form of gifts) to personnel of other companies or entities that exceed the normal standards of courtesy.

Art. 10. Criteria of conduct in relations with customer

- Fairness, availability, professionalism and competence are the guiding principles and style of conduct to be followed in relations with customers.
- Thus, it is essential that relations with customer are characterized by full transparency, respect for law and independence against any kind of conditioning, both internally and externally the Company.
- Communications to customer shall be:
 - clear and simple;
 - in compliance with laws in force;
 - in compliance with company trade policies and parameters defined therein;
 - Complete, so as not to overlook any evidence that could affect the customer's decision.
- In no case it is allowed to disclose false and tendentious information.
- Eurofork, ensures the confidentiality of the information in its hands and refrains from seeking confidential data, except where expressly authorized and in accordance with applicable legal standards.
- Employees, cooperators or external consultants must not use confidential information for purposes not related to the exercise of their activities and must not to treat the same information in a way which differs from received authorizations.
- All information about involved parties are treated in full compliance with applicable laws about data protection.

Art. 11. Criteria of conduct in relations with other companies

- Eurofork and its employees, collaborators or external consultants respect the principles and regulations of fair competition and do not violate any applicable laws. It is forbidden to create any conduct that violates the usual exercise of trade and industry.
- Eurofork and its employees and collaborators, also undertakes not to infringe rights of third parties relating to intellectual property and to comply with all rules protecting trademarks and patents.

Art. 12. Criteria of conduct in relations with public administration

- It is not allowed to offer or promise money, either directly or indirectly or through a third party, or to exert unlawful pressure to managers, officers or employees of the Public Administration or to any person in charge of a public service or their relatives or partners in order to create office proceedings or not in line with official duties.
- The only allowed forms of courtesy, are referred to and solely aimed to promote Eurofork's image and its initiatives.
- It is not permitted to omit information or set up false statements or documents with the goal to achieve contribution, funds or other payments granted by the European Union, the State or a Public Entity.
- It is also prohibited to use any obtained contributions for a different purpose from which they were assigned.

Art. 13. Criteria of conduct in the administrative, financial and accounting activities

- Each operation or financial transaction must be verifiable and legitimate. Consequently, every action and operation must be adequately recorded and supported by documentation, in order to allow inspections.
- It is forbidden to prevent or hinder public supervisory authorities' inspections.

Art. 14. Criteria of conduct in relations with judicial authorities

- The Company cooperates with the judicial authorities, law enforcement agency and any public official in inspections, investigations and judicial proceedings sphere.
- It is prohibited to put under pressure (in any form) the person called to testify in front of judicial authorities in order not to render statements or to make false statements.
- It is forbidden to help individuals who commit a criminal act, to circumvent the authority investigations, or to evade cooperation with investigations authorities.

Art. 15. Criteria of conduct in the use of company assets

- Working tools, documents and any other material, whatever tangible or intangible, are of Eurofork property and / or at its availability and must be used for working related activities; They cannot be used for non-legitimate purposes and must be used and stored with the utmost diligence.
- Any improper use shall be punished and eventually pursued in accordance with law in force.
- The Company protects all parties' personal data in accordance with current privacy regulations.
- Telematics and IT tools (phones and fax machines, e-mail, internet, hardware and software), as described by a specific procedure, at employees and / or collaborators and / or consultants disposal, are working tools and therefore are of Company property.
- The above-mentioned tools must be used for Company purposes only. Although in a marginal limit with respect to the total use, they can be used for private purposes, provided that any irregular use will be punished, regardless of whether they represent conduct pursued under current law as mentioned in the specific internal procedure.

Art. 16. Protection of health and safety at work

- Eurofork, as an integral part of its activities, continuously seeks targets aimed at improving safety of workers. Eurofork is therefore committed to:
 - Spread and consolidate the culture of safety and health at work, by promoting the responsible conduct of all the human resources employed;
 - carries out a training at predefined times.
- It promotes and implements every single activity aimed at minimizing the risks and to eliminate the causes might jeopardize the safety and health of workers.

Art. 17. Sponsorships and donations

- The Company undertakes to sponsor events that have a high beneficial value, and that are of national and / or international scope and comply with the spirit of generosity and forbids its employees to make donations against any service.
- The Company may grant donations to medical and research institutions, associations, non-profit organizations of social interest and / or local amateur sports clubs.
- Eurofork prohibits its employees to adhere to proposals for sponsorships or donations if there may be a possible conflict of interest.

Art. 18. Observance of the Code of Conduct

- The observance of this Code of Conduct from employees, contractors and consultants side must be considered as an integral part of the contractual obligations also according to the provision of Art. 2104 c.c.
- It is at each employee's responsibility, to refer to the direct reference person concerning the interpretation or application of this Code.

Art. 19. Sanctions

- Violations of this Code of Conduct will generate penalties against directors, employees, executives of the Company and will be applied in full respect of the law and the applicable national collective labor agreement.