



Date 12.10.2015

Rv. 01

**ORGANISATION AND MANAGEMENT MODEL  
ACCORDING TO LEGISLATIVE DECREE 231/01  
SUPPLEMENTED WITH ART. 30 LEGISLATIVE DECREE  
8108**

# **Organisation, management and control model according to Legislative decree n. 231 dating back to June 8, 2001**

**Enclosure C**  
-  
**CODE OF CONDUCT**



## CODE OF CONDUCT

Index:

COMPANY VISION AND MISSION.....	2
FOREWORD.....	4
<b>1 GENERAL PRINCIPLES</b>	
1.1 RECEIVERS AND CODE APPLICATION FIELD.....	4
1.2 GENERAL PRINCIPAL AND RECEIVERS' OBLIGATIONS 4	
1.3 FURTHER OBLIGATIONS FOR THE COMPANY MANAGERS .....	5
1.4 CODE OF CONDUCT ENFORCEMENT AND CONTROL .....	5
1.5 CONTRACT VALUE OF THE CODE OF CONDUCT AND DISCIPLINARY SYSTEM 6	
<b>2 RELATIONSHIPS WITH THIRD PARTIES</b>	
2.1 REFERENCE PRINCIPLES 7	
2.2 RELATIONSHIPS WITH CUSTOMERS.....	7
2.3 RELATIONSHIPS WITH VENDORS.....	7
2.4 GIFTS .....	7
2.5 RELATIONSHIPS WITH THE PUBLIC ADMINISTRATION .....	8
2.6 RELATIONSHIPS WITH THE POLITICAL ORGANISATIONS AND TRADE UNIONS.....	8
2.7 RELATIONSHIPS WITH MASS MEDIA	
<b>3 TRANSPARENCY OF ACCOUNTING</b>	8
<b>4 POLICY ON THE STAFF</b>	
4.1 HUMAN RESOURCES .....	9
4.2 STAFF SELECTION AND RECRUITMENT .....	9
4.3 EMPLOYMENT .....	9
4.4 STAFF MANAGEMENT.....	9
4.5 HARASSMENT ON THE WORKPLACE.....	9
4.6 DRUG AND ALCOHOL ABUSE .....	9
4.7 SMOKE.....	10
<b>5 SAFETY, SECURITY AND ENVIRONMENT</b>	
5.1 REFERENCE PRINCIPLES 10	
5.2 RECEIVERS' OBLIGATIONS .....	11
<b>6 CONFIDENTIALITY</b>	
6.1 REFERENCE PRINCIPLES 11	
6.2 RECEIVERS' OBLIGATIONS .....	12
<b>7 INTERNAL CONTROL AND COMPANY ASSET PROTECTION</b>	
7.1 INTERNAL CONTROLS .....	12
7.2 OPERATION REGISTRATION.....	12
7.3 COMPANY ASSET PROTECTION.....	12



## **VISION**

In 1970 I did not know the meaning of the word “Vision” but I still had a vision of what Raccorderie Metalliche had to be. I wanted a leading company at the international level in its competence sector, offering excellent products and blameless behaviours.

## **MISSION**

- Daily involve all employee in looking for the required improvements to increase the company quality and process standards promoting commitment and talent
- Always respect and protect the environment and employees' safety, security and health
- Offering quality product, prompt services, competitive commercial conditions, flawless before- and after-sale service to our customers
- Increase our internationalisation process
- Reinforce our brand image
- Transfer the value of our production all over the word, 100% manufactured in Italy.
- Increase the company profitability through innovation and operating excellence

## **COMPETENCES**

- Strong market relationships
- Efficient cooperation with the customers
- Consistent technical-technological skills
- Efficient organisation and processes
- Knowledge of the applications
- Quality and reliability

2

## **VALUES**

- Entrepreneurship and innovation
- Social commitment
- Tradition, experience
- Bravery, credibility
- Ethics: legality, transparency, correctness and honesty

RACCORDERIE METALLICHE SPA  
The President  
CAV. Lav. PIER LUIDI CECCARDI  
Signature on the original

January 2013

## FOREWORD

The Code of Conduct summarises a series of principles (legitimacy, correctness, truth, transparency, professional expertise, accountability, impartiality, non harassment, loyalty and good faith), which the activities and behaviours of the company, its employees and whoever co-operates to carry out the Raccorderie Metalliche activities are to be based on, furthermore supplementing the behaviour of such subjects pursuant to the law and the applicable contracts.

Raccorderie Metalliche therefore is well aware that it is absolutely important for the correct enforcement of its activities, to apply a Code holding a series of principles inspiring its manager and its staff behaviour while at the same time clearly and transparently defining the values the company is inspired by to reach its goals. The sector association suggested a minimum structure companies should be inspired by when drafting their Code of conduct. Entrepreneurs and members of the association are requested to comply with some essential principles:

- ✓ Fully enforce the laws and the working contracts;
- ✓ Behave with justice towards their employees, supporting their professional improvements and providing for the workplace safety and security;
- ✓ Provide for correct and equal opportunities to customers, vendors and competitors;
- ✓ Develop relationships based on correctness and integrity with the Public administration and with political parties as well;
- ✓ Protect the environment and constantly avoid any form of pollution with due commitment.

Thus the present document was enforced (hereinafter "Code") approved by the Board of directors whose compliance by employees, consultants and stakeholders (hereinafter "Receivers") is essential for the correct Company operation, its accountability protection, fame

and image and for the highest possible customer satisfaction.

Each affected Receiver should be informed about the Code, and he/she should play an active role in enforcing and reporting possible deficiencies.

Raccorderie Metalliche will do its best to ease and promote the knowledge of the Code by the Receivers and to get their constructive and precious contribution on its contents, as it to be understood and effectively enforced. Thus a copy of the Code will be displayed in places and locations easily accessible by any members of the company personnel.

It is the company commitment to ensure that the Code is enforced and complied with, providing for suitable information and prevention and control tools and at the same time guaranteeing enforced transparent operations and behaviours, and should it be required, adopting any required corrective measure.

Any behaviour against the spirit of the Code will be sanctioned in compliance with what forecast in the Code and in the regulations in force.

3

## **GENERAL PRINCIPLES**

### **1.1 RECEIVERS AND CODE APPLICATION FIEL**

The Code rules are applied to employees, consultants and de facto representatives as well, to the company auditors and to everybody who directly or indirectly, constantly or temporarily have, at any title whatsoever, relationships with Raccorderie Metalliche or work in the name or on behalf of Raccorderie Metalliche.

The Receivers of the present Code in compliance with the law and with the regulations in force will adjust their activities and uniform their behaviours to the principles, goals and commitments forecast by the Code.

## **1.2 GENERAL PRINCIPAL AND RECEIVERS' OBLIGATIONS**

The Company maintains a trusting and loyal relationship with each of the Receivers.

All the actions, operations and deals and in general any behaviour of the Receivers reported in the present Code when carrying out their working activities are based on legitimacy, truth, correctness, integrity, transparency, clarity and mutual respect.

Any action and operation by Raccorderie Metalliche must be suitably recorded and whenever required the decision and enforcement process should be checked, according to the regulations in force and to the internal procedures as well.

For each relevant operation, there must be a suitable documentary support as to carry out, whenever required, any control and identify the decision and enforcement process managers.

Any activity is to be carried out with the due commitment and professional seriousness.

Each Receiver should provide for his/her professional contributions suitable to the assigned liabilities and he/she should work safeguarding Raccorderie Metalliche prestige.

Raccorderie Metalliche employers, besides being loyal and correct, enforcing their working contract in good faith, are forbidden to carry out any activity in direct competition with the company activities; they should comply with the company rules and the Code of conduct principles, whose compliance is required in compliance and pursuant to art. 2014 of the Italian Civil Code.

The Receivers should avoid any situation and/or activity leading to conflicts of interests with the Company or which could affect their capacity to take impartial decisions, while protecting the best company interests as well.

Each Receiver is requested to know the rules reported in the Code and in the reference regulations governing their activities and they are also demanded to:

- ✓ Avoid any behaviour contrary to the rules while complying with them;
- ✓ Address their superiors or managers if required for clarification on the rule enforcement modes;
- ✓ Promptly refer any information to their superiors or managers, directly or indirectly

reporting it as for possible breach to the Code rules;

- ✓ Promptly refer any request they receive to breach the rules to their superiors or managers;
- ✓ Co-operate with any liable authority to check possible breaches.

The Receiver is not entitled to carry out any personal inquiry or refer information to others if not his/her superiors or managers. Anonymous reporting or signalling forbidden.

## **1.3 FURTHER OBLIGATIONS FOR THE COMPANY MANAGERS**

Each company department manager is obliged to:

- ✓ Be an example for his/her subordinated employees;
- ✓ Promote the compliance with the Code of Conduct by the Receivers;
- ✓ Do its best as to allow the Receivers to understand that the compliance with the Code is essential for the working and activity quality;
- ✓ Enforce immediate corrective action whenever required;
- ✓ Do its best to avoid, within the limits of his/her competences and powers, any possible retaliation.

## **1.4 CODE OF CONDUCT ENFORCEMENT AND CONTROL**

Raccorderie Metalliche, in compliance with the regulations in force, will do its best:

- ✓ To prove the knowledge of the Code of conduct inside and outside the company and its compliance as well, and the Code will be displayed in locations easily accessible to anybody;
- ✓ To promote, with the support of the competent company managers, the enforcement of suitable operating procedures and the correct and concrete enforcement of the behaviour principles recalled in the present Code;
- ✓ To oversee the correct enforcement of the Code of conduct by the Receivers and sanction any non-compliant behaviour.

The company management is liable for the supervision of the operation and compliance with the Code. The management works with the due impartiality, authority, continuity, professional expertise, independence and it suggests possible

**RACCORDERIE METALLICHE S.p.A.**

updates to the Code according to what reported by the Receivers themselves.

As to make the Code enforcement more effective, it is compulsory that any Receiver reports any non-compliant behaviour, with no delays, to the Management, by whoever works at any level whatsoever on behalf or in the name of Raccorderie Metalliche.

Thus Raccorderie Metalliche opens dedicated communication channels to inform and report about illegal or contrary behaviours to the Code, freely, directly and with the due confidentiality to the company management. Anonymous reporting is not authorised.

It is up to Raccorderie Metalliche to provide for the demanded confidentiality to the identity of the person reporting, unless differently imposed by the regulations in force and to avoid the reporter to be retaliated, illegally conditioned as well as discomfort, discriminations whatsoever on the job, simply as he/she reported a breach to the Code contents. It is up to the management to consider any received signalled reporting and assess it.

All Receivers are required to co-operate with the company management, as to collect further information required for a correct and complete signalled reporting assessment. Possible consequent measures are enforced in compliance with what forecast by the Company sanction system.

## **1.5 CONTRACT VALUE OF THE CODE OF CONDUCT AND DISCIPLINARY SYSTEM**

The compliance with provisions in the Code is essential to the contract obligations of the Receivers, whatever their source.

The Company enforces a disciplinary system and section measures obliging the Receivers to comply with the principles and values reported in the enforced Code of conduct.

Thus, in compliance with provisions in the title VII of the ccnl dating back to January 20, 2008, as a consequence of the non-compliance with the present Code of conduct, it is possible to apply the relating sanctions against the employees, according to the severity of the event, its consequences and other facts, in the following modes:

- ✓ Verbal warning or written admonition in case of light, occasional and non-intentional breaches of the Code of

conduct;

- ✓ Fine in case of repeated breaches of the Code, light as well, which individually would justify the written admonition, breaches which are anyhow more severe than what forecast in the admonition or the verbal warning or in case of relapse that is non severe breaches in case of intention or gross diligence;
- ✓ Suspension in case of repeated breaches of the Code, light as well, which individually would justify a fine, or anyhow more severe than what forecast in case of a fine, or in case of relapse that is severe breaches in case of intention or gross diligence;
- ✓ Firing or dismissal in case of repeated breaches of the Code, which individually would justify the suspension or in case of more severe breaches than what forecast in case of a suspension or in case of a relapse, that is in case of severe and significant wilful breaches, being aware and conscious of the crime committed or the damages caused to the company or crimes committed leading to such consequences.

As for people who are not employed by the company but working in the name or on behalf of Raccorderie Metalliche with any type of contract, the Company, according to the severity of the crime, is entitled to terminate the working relationship.

## **RELATIONSHIPS WITH THIRD PARTIES**

### **2.1 REFERENCE PRINCIPLES**

In case of any relationship with third parties, Raccorderie Metalliche is inspired by loyalty, correctness, transparency and efficiency.

The company employees and external consultants, whose actions can be credited to the company, should correctly behave when working on behalf and in the name of the company and in their relationships with the Public administration, independently from the market competition and the importance of the business negotiated.

Corruption, fraud, scam, illegal favours, collusive behaviours, direct instigations or through third parties to provide for personal or career advantages, are entirely forbidden.



**RACCORDERIE METALLICHE S.p.A.**

The Company recognises and complies with the Receiver rights to take part to any business activity, investment or other activities in general in the interest of Raccorderie Metalliche, on conditions that they are legal and compatible with obligations shared as employees and/or consultants.

Anyhow Receivers, the principles and rules in the present Code are destined to, should avoid any situation or activity which could be in conflict with the company interests or possibly affecting their capacity to take, at least impartially, decisions in the best Company interests and in full compliance with the Code principles.

More precisely the Receivers of the rules in the present Code are obliged to avoid any conflict of interest between economic personal and familiar activities and/or tasks carried out or offices covered in each single department.

The direct supervisor should be promptly informed about any different situation which can represent or lead to a conflict of interest as to be able to provide for the due information and directions on how to proceed.

It is not allowed to pay or offer, directly or indirectly any payment and material benefit to any third party, public or private as well which could influence or pay back any activity of their department.

## **2.2 RELATIONSHIPS WITH CUSTOMERS**

The Company, when managing its relationships with customers, aims at providing for its complete satisfaction.

More precisely the Receivers of the present Code are obliged:

- ✓ To comply with the internal procedures for the management of the relationships with customers;
- ✓ To provide, with efficiency and courtesy, within the limits of the contract, quality products and services;
- ✓ To provide for accurate and comprehensive information on the supplied products and services;

## **2.3 RELATIONSHIPS WITH VENDORS**

In the case of supply and in general in case of goods/services supply, the Receivers of the principles and rules in the present Code are obliged:

- ✓ Not to foreclose any entitled supplier beforehand, the possibility to compete as to be awarded the supply, enforcing a series of objective assessment criteria, according to declared and transparent modes in compliance with the regulations and the company habits;
- ✓ To comply with the internal procedures for the management of the relationships with vendors;
- ✓ To keep an open and sincere dialogue with the vendors, in line with the best commercial practices.

## **2.4 GIFTS**

It is absolutely forbidden to employees or their relatives to receive gifts (or any other present whatsoever) possible affecting or compromising their judgement independence, breach the law or cause prejudice to the company, or simply to its image.

It is a good practice that employees, within the limits of standard courtesy relationships, could accept only symbolic or limited value gifts. Should an employee receive a gift not compliant with such limits, he/she should promptly inform his/her Manager and once received the management opinion, he/she immediately return it.

With the exception of promotional company gadgets (diaries, gadgets, etc. with a limited economic value), employees are not allowed to accept gifts and presents. The exceptions, with a limited value and not be interpreted at all as aiming at acquiring illegal advantages for the company, are to be duly authorised by the company management. All the gifts or presents are to be delivered in public or by the company locations, as to avoid the risk it to be considered connected to a private interest.

Such rules, for offered and received gifts as well, apply for the countries as well where gifts are a habit.

## **2.5 RELATIONSHIPS WITH THE PUBLIC ADMINISTRATION**

The relationship with the Public administration is only reserved to the managers liable for them. It is not allowed to pay/offer any amount of money, object service, performance or favour of any value whatsoever to get a more favourable treatment. Gifts, donations, charities and other courtesies and hospitalities to government representatives, public officers and employees, are only allowed up to a limited economic value and however they should not affect the integrity or image of one of the parties and they should not at all be interpreted, by an impartial observer, as aiming at acquiring an improper advantage.

Anyhow, such costs are to be authorised beforehand in writing by the management and be duly documented.

During a business negotiation or a relationship with the Public administration or with private subjects, people entitled should try neither to incorrectly affect the counter-party decisions, including the decisions taken by decision-making officers, on behalf of the Public administration or the private subject nor to get confidential information.

## **2.6 RELATIONSHIPS WITH THE POLITICAL ORGANISATIONS AND TRADE UNIONS**

The company does not pay any contribution to political parties, movements, committees or political organisations and trade unions, unless according to specific regulations or agreements. Then such contributions are to be suitably registered and documented.

Any Receiver involvement in political activities can only be personal, during his/her leisure time, at his/her own costs and in compliance with the regulations in force.

Raccorderie Metalliche respects its worker right to set up trade union organisations, to be member of any trade union and to carry out any trade union activity on the workplace and it guarantees that workers are not discriminated on the workplace for their trade union membership or activity.

## **2.7 RELATIONSHIPS WITH MASS MEDIA**

The information to the outside should be true and transparent.

The company should be accurately and homogeneously presented in the communications with mass media. Only the company management is liable for any relationship with mass media.

The Receivers can't provide for information to the mass media representatives nor be committed to supply them without the management authorisation.

## **TRANSPARENCY OF ACCOUNTING**

The transparency of accounting is based of truth, accuracy and completeness of the information used for the accounting registrations.

Each Receiver is obliged to co-operate as the management facts are correctly and promptly represented in the accounting. For each operation, suitable supporting documents are being available relating to the activity carried out as to:

- ✓ Make the accounting registration easy;
- ✓ Identify the different liability levels;
- ✓ Accurately trace back the operation, to cut the interpretation mistake probability to the bare minimum.

Each registration should accurately reflect what reported in the supporting documents.

The Receivers, informed about omissions, counterfeiting, negligence in accounting or documents which the general accounting is based on, are obliged to report to their supervisors or the Supervisory committee.



## **POLICY ON THE STAFF**

### **4.1 HUMAN RESOURCES**

Human resources are what really matter for the company on-going activity.

Commitment and professional expertise of the Receivers are values and conditions required to reach the company goals.

Raccorderie Metalliche will do its best to develop skills and competences of each of its employees and it expects its employees, at any level, to cooperate to create a mutual respect climate of dignity, honour and image and reputation of everybody.

### **4.2 STAFF SELECTION AND RECRUITMENT**

The assessment and selection of the employees to be hired is based on the correspondence of the candidate profiles with the company requirements and expectations, offering equal opportunities to everybody.

The demanded information and selection criteria are strictly connected to the control of the qualification on professional and psychological aptitude profiles, at the private and candidate opinion level as well.

### **4.3 EMPLOYMENT**

The employees of Raccorderie Metalliche are all regularly employed. No employment is accepted which is not compliant with the regulations in force and with the national labour contracts, applicable for the sector.

When employing a new person, each employee gets from the Human resource department and from the direct managers accurate information on:

- ✓ Activity features and tasks to be carried out;
- ✓ Information on regulations in force and salary, according to the national sector labour contract;
- ✓ Rules and procedures to enforce as to avoid any possible risks for the employee security, safety and health on the workplace.

It is not allowed to examine or offer job

opportunities to benefit any public administration representative, which the company has on-going relationships with.

### **4.4 STAFF MANAGEMENT**

The access to the different offices/activities is based on the competences and capacities of each single employee, consistently with his/her general efficiency on the workplace.

Raccorderie Metalliche does its best to support and drive the development of all its employees, both professional and personal as well.

There is an abuse of power in the case, upon order from a superior, services, personal favours or other behaviour which enters into the bounds of a violation of the Code of Ethics, are requested.

Self-employed workers and consultants are involved in the activity, through sharing information and discussions and functional debates to reach the company goals.

Self-employees workers and/or consultants will take part to the activities in a spirit of cooperation, objectively and with independence of judgement.

### **4.5 HARASSMENT ON THE WORKPLACE**

The company aim at offering in any business and working relationship inside and outside the company, an harassment-free environment, therefore it is absolutely forbidden:

- ✓ To create a workplace violating the dignity of a person and leading to an intimidating, hostile, degrading, humiliating or offensive environment against single or group of workers;
- ✓ To interfere with no justification with the other worker performances;
- ✓ To hinder individual working perspectives for simple personal competitiveness;

The company does its best to prevent and anyhow condemn and pursue personal mobbing and harassment, whatsoever, sexual as well.

#### **4.6 DRUG AND ALCOHOL ABUSE**

Raccorderie Metalliche asks each Receiver to actively and personally play his/her role to create a working environment respectful of the other sensitivity.

Being found or simply being under the influence of alcohol, drugs, or substances that induce similar effects while at work or in the workplace:

- ✓ Will be considered as conduct jeopardizing the above atmosphere of mutual respect;
- ✓ As well as drinking alcohol on the workplace;
- ✓ And similarly using any drug or substance during a working activity

#### **4.7 SMOKE**

Comprehensive bans on smoking in all enclosed public places, in compliance with the law and however within any workplaces, as reported. Raccorderie Metalliche duly takes, when sharing the same workplace, the condition of people suffering from physical discomfort in case of smoke into account and asks to avoid any "passive smoke" on the workplace.

### **SAFETY, SECURITY AND ENVIRONMENT**

#### **5.1 REFERENCE PRINCIPLES**

Among its activities, Raccorderie Metalliche does its best to take part to the welfare and development of its surrounding community where it works, aiming at guaranteeing employees, consultants, customers and affected communities safety and security while trying to cut the environmental impact to the bare minimum.

The company actively plays its role in the promotion of the scientific and technological development aiming at the environmental protection and safeguard of available resources. The company operating management should refer to updated criteria in terms of environmental protection and energy efficiency, improving health conditions and safety on the workplace.

Technological research and innovation should

lead to the promotion of processes and products which are more and more environmental-friendly while paying the due attention to the worker safety and security.

Thus Raccorderie Metalliche clearly displays the present document to accessible locations to everybody, including the leading principles and criteria which decisions are based on at any level whatsoever in terms of safety, security and health on the workplace. Hereinafter defined such principles and criteria:

- ✓ Avoid risks;
- ✓ Assess risks which can't be avoided;
- ✓ Combat risks at source;
- ✓ Duly keep the technical evolution into account;
- ✓ Replace what it is dangerous which what it is not or it is less dangerous;
- ✓ Schedule prevention, aiming at a consistent interventions involving technique, work organisation, operating conditions, social relationships and influence on the main factors on the workplace;
- ✓ Prioritize collective protection measures against individual protection;
- ✓ Provide for correct instructions to workers.

Such principles are promoted within the company to enforce all the required measures providing for the worker security and safety, including prevention activities against professional risks, information and training as well as setting a suitable organisation and intervention means.

The company at any level, management and operations as well, should comply with such principles, when decisions or choices are to be made and then when they are to be enforced [refer to art. 6, paragraph 2, letter b, of the Legislative decree n. 231/2001].

#### **5.2 RECEIVERS' OBLIGATIONS**

The Receivers of the present Code of conduct, as part of their duties and offices, take part to the risk prevention, safety, security, health and environmental protection processes for themselves, their colleagues and third parties as well.

More precisely, the effects on safety, security and health on the workplace are recalled in the main worker duties, inspired by art. 20 of Legislative decree n. 81/2008, hereinafter annexed, integral to the company disciplinary rules.

Legislative decree n. 82/2008, art. 20 - Obligations of the employees:

1. - Each employee must take care of his or her own health and safety and the health and safety of others present in the workplace, as far as they are affected by the employee's own actions and negligence, in compliance with his or her own training and instructions and tools supplied by the employer.
2. In particular the employees should:
  - a) contribute, together with the employer, managers and supervisors, to the fulfilment of all the requirements imposed by the qualified authority necessary to protect the health and safety;
  - b) obey the instructions given by the employer, managers and supervisors, for individual and collective protection;
  - c) use correctly machinery, equipment, tools, dangerous substances and mixtures, means of transportation, and other work apparatus, as well as safety devices;
  - d) use appropriately the protection devices supplied to them;
  - e) report immediately to the employer, the managers or the supervisor the lack of means and devices according to lines c) and d), as well as other possible conditions of danger they are informed of, acting directly, in case of emergencies, according to their competences and possibility to intervene, notwithstanding the total compliance with letter f) to eliminate or reduce such deficiencies or danger, reporting them to the workers' safety representative;
  - f) do not remove or modify without authorization the devices for safety, signals or control;
  - g) do not carry out on their own initiative, operations or manoeuvres which they are not able or trained to do or that could compromise their own safety or that of others;
  - h) take part to the training and education programmes organised by the employer;
  - i) have the required health check-ups forecast by the present legislative decree and anyhow specified by the competent medical

doctor;

3. Workers of companies liable for contracting or subcontracting activities must exhibit and display their badges, including a photograph, including the general information relating to the employer and the information on their employer. The manager of the independent workers carrying out their activities on the work place are liable for such obligations, to be independently complied with".

## **CONFIDENTIALITY**

### **6.1 REFERENCE PRINCIPLES**

The activities of Raccorderie Metalliche can ask for the acquisition, storage, treatment, communication and spreading of information, documents and other data relating to the technological processes, administration procedures, financial operations, deals, know-how, etc.

Each Receiver should guarantee the confidentiality of any information provided during his/her operating activity anyhow.

The company is committed to protect all the information relating to employees and third parties, generated or acquired inside the company or through business relationships ad to avoid any illegal or incorrect information use.

More precisely the information available to Raccorderie Metalliche is processed and treated in compliance with confidentiality and privacy, in compliance with Legislative decree n. 196 dating back to June 30, 2003 [Code on personal data protection] and its following amendments and changes.

Information, knowledges and data acquired or processed by the Receivers during their office or activities belong to the Company and they can't be used, communicated or spread out without the due authorisation by Raccorderie Metalliche management.

Each communication of documents or information relating to Raccorderie Metalliche outside in any form whatsoever, should be compliant with regulations, laws and professional conduct practices in force, transparently, clearly and promptly as well.

Strategic plans, working projects, processing processes, features and costs of products, data on the company management and their evolution,

financial year forecasts, equity, financial operations, economic results and accounting data in general, operating methods and strategies, investments and disinvestments with relating projects, personal data of the company entities and employees, lists of customers, vendors, consultants and experts are all the be considered confidential information.

## **6.2 RECEIVERS' OBLIGATIONS**

Without prejudice to the prevention of spreading information as for the organisation and the activity processing methods of the company or of using such information to affect the company, each Receiver should comply with what specified on confidentiality in the Strategic document on Safety and in the Company regulations on data safety and security, drafted by the Company to enforce the relating legislative decree, suitably spread out among the Receivers.

## **INTERNAL CONTROL AND COMPANY ASSET PROTECTION**

### **7.1 INTERNAL CONTROLS**

Internal controls include all the tools required or necessary to address, manage and check the company activities, aiming at:

- ✓ Providing for the compliance with the law and company procedures;
- ✓ Providing for accurate and complete financing and accounting data and for the correct exposure and communication of data and information on the financial statements, reports and other communications to the shareholders or to the public;
- ✓ Supporting the correct control and auditing activities;
- ✓ Protecting the integrity and effectiveness of the company share capital and equity;
- ✓ Supporting the free meeting decisions;
- ✓ Providing for the demanded protection of the creditor rights;
- ✓ Efficiently managing the company activity.

The Receivers should be well acquainted with the control procedures and aware of their contribution in reaching the company goals and efficiency.

The management should enforce an internal effective control system at any operating level, and as a consequence, all the Receivers, according to their offices, are liable for the definition, enforcement and correct operation of controls relating to the operating activities they carry out.

Within their competences, the unit/department managers are obliged to take part to the company control system, involving their direct employees as well.

### **7.2 OPERATION REGISTRATION**

Any action and operation by Raccorderie Metalliche must be suitably recorded and whenever required the decision and enforcement process should be checked, according to the regulations in force and to the internal procedures as well.

For any operation, there should be correct documentary evidence as to carry out, whenever required, all the necessary controls to prove the many features and reasons the operation is based on while identifying the person authorising, enforcing, registering and finally controlling the operation itself.

### **7.3 COMPANY ASSET PROTECTION**

Raccorderie Metalliche enforces management operating modes suitable to a correct company asset management, as to allow any asset to be consistently available whenever required for the demanded use.

Each Receiver is the guardian of the company assets (tangible and intangible), instrumental to his/her activity.

No Receiver can incorrectly use the company assets or resources or is entitled to allow anybody to profit from them.