

**ETHICS
AND DISCIPLINARY CODE
OF THE COMPANY**

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Called reference byelaws and requirements source:

- a. Civil Code
- b. The D. Lgs. 81/2008 and ss.aa. and ii. "*Testo Unico* of Safety"
- c. Il D. Lgs. 231/2001 and ss.aa. and ii. "Discipline Accounting Resp. and Organisational Transp."
- d. The D. Lgs. 152/06 and ss.aa. and ii. "Environment *Testo Unico*"
- e. The D. Lgs. 196/03 and ss.aa. and ii. and the D.G.P.R. 679/2016 "Code about Privacy"
- f. Directives and rules, disciplinary, ethical codes executed with the Commission
- g. Applied national collective labor contract
- h. The by-laws of workers L. 300/1970 and ss.aa. ii.

Internal reference organisational documents:

- i. Document of Analysis and risks assessment of offence in force
- j. Company procedures and instructions in force
- k. Company Organisational chart in force
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- m. Document of risks assessment about health and safety in force
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1. Code of Ethics

KATO IMER S.P.A. undertakes to respect and act in accordance with any applicable law, directive, collective agreement and any supplementary agreement on human rights, protection of workers, environmental protection and Sustainability Principles.

KATO IMER S.P.A. undertakes to condemn corruption, even "private" corruption, and to act to combat all its forms, including extortions and bribes, exchange of political-electoral favours.

The use of sub-suppliers in the production process of KATO IMER S.P.A. it is conditional on acceptance of this code of ethics and discipline.

Respect for human rights, people and the work environment

The staff employed by KATO IMER S.P.A. must consist exclusively of employees and collaborators, the "Personnel", of which KATO IMER S.P.A. assumes the direct responsibility respectively for what concerns:

- (i) the management of the Personnel;
- (ii) direct relations with them, both with regard to the authorities responsible for the application of the regulations in force concerning work, security and social security, and in relations with any trade union organizations.

KATO IMER S.P.A. must comply with the Personnel to all the obligations placed on him in matters of work, health and safety, recruitment and remuneration, welfare and assistance, provided for by law, by the National Collective Labour Contract ("CCNL") for the Metalworking sector - Industry, from territorial or company agreements, also integrative, in force in the time in which the Contract takes place.

KATO IMER S.P.A. does not use child labour.

KATO IMER S.P.A. does not use or support in any way the use of forced or compulsory labor, and must not require to personnel to pay "deposits" or deposit identity documents at the beginning of the employment relationship.



KATO IMER S.P.A. does not withhold any part of the salary, indemnity, property or documents of the Personnel, using them in order to force Personnel to continue working in the employment relationship undertaken.

In any case, Personnel must have the right to leave workplaces upon completion of the standard working day and be free to terminate the employment contract by informing the employer as provided for by the CCNL.

KATO IMER S.P.A. must guarantee a safe and healthy working environment and takes effective measures to prevent potential accidents and injuries to the health and safety of personnel and any other worker, in relation to events occurring during work; in so doing, KATO IMER S.P.A., also takes into account the state of the prevailing knowledge in the sector and any other specific risk; it will reduce, as far as reasonably possible, the causes of risk present in the workplace. KATO IMER S.P.A. must also provide the Personnel with every means necessary for their own protection when required by the regulations in force in the place where the service takes place.

KATO IMER S.P.A. undertakes to instruct the Personnel on the different aspects of safety, standards and procedures so that the staff can familiarize themselves with the use of safety devices.

KATO IMER S.P.A. must guarantee the right of the personnel to form, participate and organize unions according to their own will and to contract collectively with KATO IMER S.P.A..

KATO IMER S.P.A. must not adopt or support any form of discrimination in employment, remuneration, access to training, promotion, dismissal or retirement of personnel, based on race, social class or national origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political opinions, age or any other condition that could give rise to discrimination.

KATO IMER S.P.A. must not allow threatening and offensive behavior, however aimed at exploitation, or sexually coercive, including gestures, language or physical contact, in the workplace.

KATO IMER S.P.A. must treat all personnel with dignity and respect and must not support or tolerate the use of corporal punishment, mental or physical coercion, verbal abuse against the Personnel.

KATO IMER S.P.A. must comply with applicable laws and industry standards on working hours, holidays and celebrations days. The standard work week, excluding overtime, must be established by law.

KATO IMER S.P.A. must ensure that the salaries of the Personnel and the composition of compensation payments are clearly and regularly detailed in writing for each pay period.

KATO IMER S.P.A. it must also ensure that salaries and compensation payments are transmitted in full compliance with applicable laws and that remuneration is paid in cash or incontrollable forms, according to the most convenient methods for workers.

KATO IMER S.P.A. guarantees not to enter into agreements that provide for the provision of illegal employment or false training schemes in order to avoid the fulfilment of obligations to the Personnel in compliance with applicable labor laws and social security laws and regulations.

Respect and protection of the environment

KATO IMER S.P.A. undertakes to:

- (i) implement the production cycle in full compliance with all applicable laws, regulations and / or regulations, with regard to the environment with respect for animals and plants protected by national and international laws applicable in the operational and Registered Office, applying in any case the most restrictive;
- (ii) use the utmost care and diligence in the choice of materials that KATO IMER S.P.A. must independently procure, in particular for the materials used in the execution of supplies and workmanship and for the realization of the Products and implement the processing cycle, of which KATO IMER S.P.A. must guarantee the legitimate origin, legitimate marketability and usability in full compliance with national and international regulations;
- (iii) act in respect of the environment and conscious use of environmental resources, with reference to the procurement of raw materials, the use and disposal of materials, having particular regard to problems related to recyclability and toxicity, emissions and energy savings.

2. Company disciplinary code

In application of the provisions of art. 7, paragraph 1, of the Law of May 20, 1970, n. 300 and the National Collective Labour Contract for Workers employed in the Metalworking sector - CONFAPI we bring to the attention of the workers, whose relationship is governed by the cited contracts, the following disciplinary rules related both to the procedure for contesting disciplinary infractions and to the applicable penalties for each of them. This Code will remain permanently deposited at the Administration Office. The Management will provide appropriate communication and dissemination of any changes or additions that should subsequently occur. The updated text will be present on the Company's intranet.

"LAWS REGARDING DISCIPLINARY AND WORKER OBLIGATIONS WHOSE NON-COMPLIANCE REQUIRES THE APPLICATION OF DISCIPLINARY SANCTIONS"

The provisions of the various sources that make up the disciplinary rules to which this Code of Ethics and Disciplinary refers are set out below:

2.1) The by-laws of workers

The provisions of art. 7 of the law of May 20, 1970, n. 300 "by-laws of Workers " and subsequent amendments and additions as compatible. In particular, the following is recalled:

Art. 7 Disciplinary sanctions

The disciplinary rules concerning the sanctions, the infringements in relation to which each of them can be applied and the procedures for contesting them must be brought to the attention of the workers by means of posting in a place accessible to all. They must apply what is established in the field by agreements and employment contracts where they exist.

The employer cannot take any disciplinary measures against the worker without having previously challenged the charge and without having heard him in his defence. The worker may be assisted by a representative of the trade union to which he is a member or gives a mandate.

Without prejudice to the provisions of the law of 15 July 1966, n. 604, disciplinary sanctions cannot be imposed that involve definitive changes of the working

relationship; moreover the fine cannot be arranged for more than three hours of basic pay and the suspension from service and pay for more than three days. Please refer to the CCNL of the category for details of specific disciplinary sanctions.

In any case, the most serious disciplinary measures of the verbal warning cannot be applied before five days have elapsed from the written challenge of the fact giving rise to the case. If the employer does not provide, within ten days from the invitation received by the employment office, to appoint his representative in the college referred to in the previous paragraph, the disciplinary sanction shall not have effect. If the employer appeals to the judicial authority, the disciplinary sanction remains suspended until the judgment is defined.

2.2) The Civil code

The present Disciplinary Code assumes and adopts the provisions of private law of the Civil Code referred to in the matter of diligence of the subordinate employee, fidelity obligation, company management and disciplinary sanctions, and in particular the following articles:

Art. 2104 "Diligence of the employee"

The work provider must use the diligence required by the nature of the due service, by the interest of the company and by the higher interest of the national production. It must also observe the provisions for the execution and for the discipline of work given by the entrepreneur and the collaborators of this from which he is hierarchically dependent.

Art. 2105 "Loyalty obligations"

The employer must not deal with his own business or third parties in competition with the entrepreneur, or divulge information relating to the organization and production methods of the company, or use them in such a way as to be able to cause it harm.

Art. 2106 "Disciplinary sanctions"

Failure to comply with the provisions contained in the two previous articles may result in the application of disciplinary sanctions, depending on the gravity of the infringement and in compliance with corporate regulations. It is important to underline that, like the concrete application of disciplinary sanctions, it does not require any criminal proceedings, since the rules of conduct are assumed by the

company in full autonomy, regardless of the unlawful conduct that may result.

2.3) D. Lgs. 81/2008 and ss.aa. and ii.

This Code of Ethics and Disciplinary assumes and adopts the provisions of Legislative Decree 81/2008 and subsequent amendments. and ii. and in particular the provisions of articles 18: Obligations of the employer and of the manager, art. 19: Obligations of the person in charge, art. 20: Workers' Obligations

Article 18 - Obligations of the employer and the manager

1. The employer, who carries out the activities referred to in Article 3, and the managers, who organize and direct the same activities according to the duties and powers conferred upon them, must:

a) appoint the doctor responsible for carrying out health surveillance in the cases provided for in this legislative decree.

b) designate in advance the workers in charge of the implementation of fire prevention and fire fighting measures, of evacuation of workplaces in case of serious and immediate danger, rescue, first aid and, in any case, emergency management;

c) in entrusting tasks to workers, taking into account their capacities and conditions in relation to their health and safety;

d) provide the workers with the necessary and appropriate personal protective equipment, having heard the person responsible for the prevention and protection service and the competent doctor, if any;

e) take appropriate measures so that only workers who have received adequate instructions and specific training access areas that expose them to a serious and specific risk;

f) request compliance by individual workers with the regulations in force, as well as with company regulations on occupational health and safety and on the use of collective means of protection and the individual protection devices made available to them;

g) request the competent doctor to comply with the obligations imposed on him in this decree;

h) adopt measures to control risk situations in case of emergency and give instructions so that workers, in case of serious, immediate and unavoidable danger, leave the workplace or the danger zone;

i) informing as soon as possible workers exposed to the risk of a serious and immediate danger about the risk itself and the provisions taken or to be taken with regard to protection;

- l) fulfil the information, training and training obligations set out in Articles 36 and 37;
- m) abstain, except for duly motivated by health and safety requirements, from requiring workers to resume their activity in a work situation in which a serious and immediate danger persists;
- n) allow workers to verify, through the workers' representative for safety, the application of safety and health protection measures;
- o) promptly deliver to the workers' representative for safety, at the request of the latter and for the performance of his function, a copy of the document referred to in Article 17, paragraph 1, letter a), and allow the same representative to access the data referred to in point r);
- p) draw up the document referred to in Article 26, paragraph 3, and, upon request of these and for the performance of its function, promptly deliver a copy to the workers' representatives for safety;
- q) take appropriate measures to avoid that the technical measures adopted may cause risks to the health of the population or deteriorate the external environment by periodically checking the continued absence of risk;
- r) to communicate to INAIL, or IPSEMA, in relation to their respective competences, for statistical and information purposes, the data related to accidents at work that result in an absence from work of at least one day, excluding that of the event; for insurance purposes, information relating to accidents at work leading to an absence from work of more than three days;
- s) consult the workers' safety representative in the cases referred to in Article 50;
- t) take the necessary measures for the purposes of fire prevention and evacuation of workplaces, as well as for cases of serious and immediate danger, in accordance with the provisions of Article 43. Such measures must be adapted to the nature of the activity , the size of the company or production unit, and the number of people present;
- u) as part of the performance of activities under contract and subcontracting, provide workers with a special identification card, complete with photography, containing the employee's particulars and the employer's indication;
- v) in the production units with more than 15 workers, convene the periodic meeting referred to in Article 35;
- z) update prevention measures in relation to organizational and production changes that have relevance for health and safety at work, or in relation to the degree of evolution of the prevention and protection technique;
- aa) communicate annually the names of workers' representatives for safety to INAIL;

bb) to ensure that workers for whom the health surveillance obligation is in force are not assigned to the specific work task without the required eligibility judgment.

2. The employer shall provide the prevention and protection service and the competent doctor with information on:

- a) the nature of the risks;
- b) work organization, planning and implementation of preventive and protective measures;
- c) the description of the plants and production processes;
- d) the data referred to in paragraph 1, letter r and those relating to occupational diseases;
- e) the measures taken by the supervisory bodies.

3. The obligations related to the structural and maintenance interventions necessary to ensure, according to the present legislative decree, the safety of the premises and buildings assigned to public administrations or public offices, including educational and educational institutions, will remain charged of the administration held, as a result of rules or conventions, to their supply and maintenance. In this case, the obligations established by the present legislative decree, with regard to the aforementioned interventions, are understood as fulfilled by the managers or officers in charge of the offices concerned, with the request of their fulfillment to the competent administration or to the person who is obliged to do so. legal.

Article 19 - Obligations of the foreman

1. With reference to the activities indicated in article 3, the foremen, according to their duties and responsibilities, must:

- a) to supervise and supervise the observance by individual workers of their legal obligations, as well as the company provisions on health and safety at work and the use of collective protection and the personal protective equipment made available to them; in case of persistence of non-compliance, inform their direct superiors;
- b) verify that only workers who have received adequate instructions access areas that expose them to a serious and specific risk;
- c) request the observance of the measures for the control of the risk situations in case of emergency and give instructions so that the workers, in case of serious, immediate and inevitable danger, abandon the workplace or the danger zone;
- d) inform as soon as possible workers exposed to the risk of a serious and immediate danger about the risk itself and the provisions taken or to be taken with regard to protection;

- e) to abstain, except for duly motivated exceptions, from requiring workers to resume their activity in a work situation in which serious and immediate danger persists;
- f) promptly report to the employer or manager the deficiencies of means and equipment of work and personal protective devices, and any other condition of danger that occurs during work, which becomes aware on the basis of training receipt;
- g) attend special training courses as provided for in Article 37.

Article 20. Workers' obligations

1. Every worker must take care of his own health and safety and that of other persons present in the workplace, on which the effects of his actions or omissions fall, in accordance with his training, instructions and means provided by the employer .

2. Workers must in particular:

- a) contribute, together with the employer, to the managers and foremen, to the fulfilment of the obligations envisaged to protect health and safety in the workplace;
- b) observe the provisions and instructions given by the employer, the managers and the foremen for the purposes of collective and individual protection;
- c) to correctly use work equipment, dangerous substances and preparations, means of transport and safety devices;
- d) use the protection devices made available to them in an appropriate manner;
- e) immediately inform the employer, the manager or the foreman of the deficiencies of the means and devices referred to in subparagraphs c) and d), as well as any danger condition they may become aware of, and take direct action, in urgent cases, within the scope of their powers and possibilities and without prejudice to the obligation referred to in point f) to eliminate or reduce situations of serious and looming danger, giving notice to the workers' representative for safety;
- f) do not remove or modify security or warning or control devices without authorization;
- g) not carry out on their own initiative operations or manoeuvres which are not within their competence or which may compromise the safety of themselves or other workers;
- h) participate in training and training programs organized by the employer;
- i) undergo the health checks provided for by this legislative decree or otherwise arranged by the competent doctor.

3. Workers of companies that carry out activities under the contract or subcontracting procedure must display a special identification card, complete with a photo, containing the employee's data and the employer's indication. This obligation also is applied to self-employed workers who exercise their business directly in the same place of work, who are required to provide for their own account.

b) participate in specific training courses on health and safety at work, focusing on the risks inherent in the activities carried out, according to the provisions of article 37, without prejudice to the obligations established by special rules.

Article 22 - Designers' obligations

1. Designers of places and workplaces and facilities respect the general principles of prevention in the field of occupational health and safety at the time of design and technical choices and choose equipment, components and protective devices that comply with the laws and regulations in the field.

Article 23 - Obligations of manufacturers and suppliers

1. The manufacture, sale, rental and concession in use of work equipment, personal protective equipment and installations that do not comply with the laws and regulations in force concerning health and safety at work are prohibited.

2. In the case of financial leasing of goods subject to conformity attestation procedures, the same must be accompanied, by the grantor, by the relative documentation.

Article 24 - Obligations of installers

1. Installers and fitters of plants, work equipment or other technical means, for the part of their competence, must comply with the health and safety at work regulations, as well as the instructions provided by the respective manufacturers.

Article 25 - Obligations of the competent doctor

1. The competent doctor:

a) collaborates with the employer and with the prevention and protection service for risk assessment, also for the purposes of programming, where necessary, the

health surveillance, the preparation of the implementation of measures for the protection of health and psycho-physical integrity of workers, training and information to workers, for the part of responsibility, and the organization of first aid service considering the particular types of workmanship and exposure and the peculiar organizational modalities of the work. He also contributes to the implementation and enhancement of voluntary "health promotion" programs, according to the principles of social responsibility;

b) programs and carries out the health surveillance referred to in Article 41 through health protocols defined according to specific risks and taking into account the most advanced scientific guidelines;

c) establishes, also by accessing the health and risk records referred to in point f), updates and safeguards, under its own responsibility, a health and risk file for each worker subjected to health surveillance. In companies or production units with more than 15 workers the competent doctor agrees with the employer the place of custody;

d) delivers to the employer, upon termination of the appointment, the medical documentation in his possession, in compliance with the provisions of the legislative decree of 30 June 2003 n.196, and with safeguarding professional secrecy;

e) hands over to the worker, upon termination of the employment relationship, the medical documentation in his possession and providing him with information regarding the need for conservation;

f) sends to ISPESL, exclusively by electronic means, the health and risk records in the cases provided for by this legislative decree, upon termination of the employment relationship, in compliance with the provisions of Legislative Decree 30 June 2003, n. 196. The worker concerned may request a copy of the aforementioned folders to ISPESL through his general practitioner;

g) provides information to workers on the significance of the health surveillance to which they are subjected and, in the case of exposure to agents with long-term effects, on the need to undergo health checks even after cessation of the activity involving exposure to such agents. He also provides, on request, similar information to workers' safety representatives;

h) informs each worker concerned of the results of the health surveillance referred to in Article 41 and, at the request of the worker, issues a copy of the health documentation;

i) informs in writing, at the meetings referred to in Article 35, the employer, the person responsible for the risk protection prevention service, the workers' representatives for safety, the anonymous collective results of the health surveillance carried out and provides indications on the meaning of said results for the purpose of implementing measures to protect the health and psycho-physical integrity of workers;

- l) visits the workplaces at least once a year or at a different frequency which establishes on the basis of the risk assessment; the indication of a different periodicity from the annual must be communicated to the employer for the purpose of his annotation in the risk assessment document;
- m) participates in the planning of workers' exposure control, the results of which are provided promptly for the purposes of risk assessment and health surveillance;
- n) communicates, by self-certification, the possession of the qualifications and requirements referred to in Article 38 to the Ministry of Health within the term of six months from the date of entry into force of this decree.

Article 26 - Obligations related to procurement, work or supply contracts

1. The employer, in the event of assignment of work to the contractor or self-employed workers within their company, or of a single production unit thereof, as well as within the entire production cycle of the company itself:

a) verifies, in the manner provided for in the decree referred to in Article 6, paragraph 8, letter g), the professional technical suitability of the contracting companies or self-employed workers in relation to the work to be contracted or by contract of work or administration. Until the date of entry into force of the decree referred to in the preceding period, the verification is carried out through the following methods:

1) acquisition of the certificate of registration to the chamber of commerce, industry and crafts;

2) acquisition of self-certification by the contractor or self-employed workers in possession of the requisites of professional technical competence, pursuant to art. 47 of the Consolidated Law on Administrative Documentation, as per the Decree of the President of the Republic of 28 December 2000, n. 445;

b) provides the same subjects with detailed information on the specific risks existing in the environment in which they are intended to operate and on the prevention and emergency measures adopted in relation to their activities.

2. In the hypothesis referred to in paragraph 1, employers, including subcontractors:

(a) cooperate in the implementation of measures to prevent and protect against occupational hazards which affect the work activity which is the subject of the contract;

b) coordinate the actions of protection and prevention from the risks to which workers are exposed, informing each other also in order to eliminate risks due to

interference between the work of the various companies involved in the execution of the overall work.

3. The contracting employer promotes the cooperation and coordination referred to in paragraph 2, by developing a single risk assessment document that indicates the measures taken to eliminate or, where this is not possible, to minimize the risks from interference. This document is attached to the contract or work contract. For contracts stipulated before 25 August 2007 and still in progress as of 31 December 2008, the document referred to in the previous period must be attached by that last date. The provisions of this paragraph do not apply to the specific risks inherent in the activity of contractors or individual self-employed workers.

4. Without prejudice to the provisions of the law in force concerning joint and several liability for non-payment of salaries and social security contributions and insurance, the contracting contractor shall jointly and severally liaise with the contractor, as well as with any of the subcontractors, for all damages for which the employee, dependent on the contractor or the subcontractor, is not indemnified by the National Institute for Insurance against Accidents at Work (INAIL) or the Institute for Occupational Safety for the Maritime Sector (IPSEMA). The provisions of this paragraph shall not apply to damages resulting from the specific risks specific to the activity of contracting or subcontracting companies.

5. In individual contracts for subcontracting, procurement and administration, even if in force at the time of entry into force of this decree, as per articles 1559, excluding contracts for the supply of essential goods and services, 1655, 1656 and 1677 of the Italian Civil Code, the costs relating to the safety of work must be specifically indicated under penalty of invalidity pursuant to Article 1418 of the Italian Civil Code, with particular reference to those relating to the specific contract. With reference to the contracts referred to in the previous period stipulated before August 25, 2007, labour security costs must be reported by December 31, 2008, if the same contracts are still underway at that date. These data can be accessed, upon request, by the workers 'representative for security and by the local bodies of the comparatively most representative workers' union organizations at national level.

6. In drawing up tenders and assessing the anomaly of tenders in the procurement procedures for public works, services and supplies, contracting entities are required to assess whether the economic value is adequate and sufficient in relation to the cost work and the cost related to safety, which must be specifically

indicated and be consistent with the size and characteristics of the works, services or supplies. For the purposes of this paragraph, the cost of labor is periodically determined, in appropriate tables, by the Ministry of Labor and Social Security, based on the economic values established by collective bargaining stipulated by the comparatively most representative trade unions, social security and welfare regulations, of the different product sectors and of the different territorial areas. In the absence of an applicable collective agreement, the cost of labor is determined in relation to the collective agreement of the product sector closest to that taken into consideration.

7. For anything not otherwise provided by the legislative decree 12 April 2006 n. 163, as last amended by article 8, paragraph 1, of the law of 3 August 2007, n. 123, the provisions of this decree are applied to public procurement.

8. In the context of carrying out activities under the contract or subcontracting procedure, the personnel employed by the contractor or subcontractor must be provided with a special identification card with a photograph containing the details of the worker and the indication of the employer .

2.4) Legislative Decree 231/01 and ss.aa. and ii.

This Disciplinary Code assumes and adopts the provisions of Legislative Decree 231/01 and in particular in the "Organization, management and control way" approved by the company, including all procedures, corporate institutions, communications, provisions and service orders for the parties in which the correct conduct is disciplined to prevent or prevent the occurrence of the crimes contemplated in the decree itself. The organization, management and control model is defined by internally approved documents, of which the present Code of Ethics and Discipline is an integral and complementary part thereof:

2.4.1 Document of Analysis and Assessment of the Risks of Crime in force

2.4.2 Current company procedures and instructions

2.4.3 Company organization chart in force

2.4.4 Company job descriptions in force

2.4.5 Circulars and internal communications in force

2.4.6 Risk Assessment Document for Health and Safety in force

2.4.7 Emergency plans and procedures in force

2.4.8 Acts of the Organ admitted to the management of the company organization

2.4.9 Corporate internal regulations

The procedural, behavioral and process requisites referred to above are to be considered for all the workers covered by this Code of Ethics and Disciplinary Code.

2.5) The National Collective Labor Contract

The present Disciplinary Code assumes and adopts the provisions contained in the National Collective Labour Contract of reference for Workers in the Mechanical Engineering sector - CONFAPI.

Rights and duties of the worker

The worker, regardless of level or salary level, in carrying out his duties, must scrupulously follow the instructions provided by his hierarchal superiors. In case of difficulty in the application of the indicated or proceduralized, it is not authorized to deviations or exceptions, and is obliged to contact his immediate superior. For matters relating to health and safety, can contact his Workers Safety Representative.

The worker towards colleagues must maintain a correct and polite behaviour. In the event of disagreements and discussions, differences of opinion are required to report to their hierarchical superiors for decisions of merit. Physical or verbal assault, threats, dissemination of false or false information about the honorability of a colleague may be subject to serious disciplinary measures, including termination of the employment relationship, regardless of whether the person injured or not complains complaint-lawsuit .

The superiors will report with subordinate employees in compliance with the rules of dignity, decorum, collaboration and education.

The company will take care to put workers in a position to avoid possible misunderstandings or interpretations about people to whom for organizational and work needs, as well as to the direct superior, each worker is required to apply. The organization chart and the company job title in force are published and posted in the places of free and frequent access of the Personnel.

The worker must behave correctly with reference to the duties inherent in the task of entrusting him, aware of the fact that an omission or deviation from the expected behaviour can cause economic damage and corporate image, administrative sanctions, legal proceedings against company bodies .

In particular he must:

1. Respect the working time and comply with the formalities prescribed by the Company for the control of attendance, travel and company missions.
2. Report any absence to his manager by the morning of the first day of absence and, in the event of absence due to illness, send the medical certificate to the "Administration" office by the second day of absence;
3. To carry out his activity diligently, observing the provisions of the contract, the provisions issued by the Management, as well as the instructions given by the hierarchical superiors.
4. Keeping the secret of the Company's interests, not taking advantage of what is the subject of his functions, carrying out activities that are contrary to the interests of the company's production or to his corporate image and reputation.
5. Takes care of the material, the equipment, the work tools; keep the toilets clean and tidy; do not throw loose or occlusive objects into the toilet and sinks; use in the toilets civil behaviour in respect of all employees;
6. Takes care of his own safety and health and that of other people in the workplace, which may affect the effects of his actions or omissions, in accordance with the training and instructions received and the means provided by the employer;
7. Observes the provisions and instructions given by the Management for the protection of collective and individual health and safety
8. To use correctly the equipment, the means of transport, even private if used in the exercise of company functions, the safety devices;
9. Reports immediately to the employer the deficiencies of the means and safety devices, as well as any other dangerous conditions, making direct efforts, in an emergency, within the scope of their skills and possibilities, to eliminate or reduce these deficiencies or dangers
10. Do not remove or modify safety, warning or control devices without authorization
11. Do not carry out operations on his own initiative that are not within your own competence and which may compromise his own safety or that of other workers

12. Undergo the health checks provided by the Management and the Competent Doctor
13. Contribute, together with the employer, to the fulfillment of all the obligations imposed by the competent authority or in any case necessary to protect the safety and health of workers at work
14. Contribute, together with the legal representative and managers, to the fulfillment of all the obligations imposed by the competent authority or necessary to protect the security and integrity of the information, whether sensitive or ordinary data, with reference to: Customers , Users, Customers, Corporate Bodies, Workers, Suppliers.
15. Not to issue to Customers or their relatives, to colleagues or managers or their relatives, to suppliers, and in general to unauthorized third parties, information and data concerning the production and provision of related services, status of payments, contract holder , or any other information for any reason or reason.
16. Promptly report to his supervisor any irregularities in the progress of work in production or management of services, or in the management of the relationship with the Customer / User of which he becomes aware.
17. Do not introduce alcoholic beverages in the company premises and work areas without authorization. Do not take alcoholic beverages during and outside meals if the use of company or private means for business purposes is foreseen due to work circumstances.
18. Do not use alcohol, drugs or psychotropic substances before entering work, working hours or breaks from work.
19. Do not show up or stay at work or drive company or private vehicles in a state of alteration and / or intoxication or under the influence of drugs or psychotropic substances.
20. In the event that you are driving vehicles inside the company car park, keep a moderate speed and a correct driving behavior, avoiding maneuvers that may cause damage to people, animals or things.
21. Take care of the assigned vehicle, promptly report any failure or malfunction to the manager and return it in perfect condition

22. Use company vehicles for work-related reasons, unless they have been granted for promiscuous use. The use of the vehicle on non-working days is not allowed, unless otherwise authorized by the Management.
23. Check the presence of an updated fuel card in the vehicle.
24. Observe the provisions of the Highway Code in the handling of the vehicle, as well as all the possible precautionary safety measures designed to prevent possible health risks for the safety of themselves and third parties; in the event of a traffic accident, complete the necessary documentation and promptly inform the employer.
25. In the use of company transportation or the use of private vehicles during working hours and service commanders, avoid transporting third parties or personal or private goods not related to the performance of the activity.
26. Respecting the absolute ban on smoking in business premises, including with reference to "electronic cigarettes".
27. Uses the company telephone, landline or mobile, as well as fax, internet and e-mail for work-related purposes
28. Keeps his workspace tidy and clean.
29. Requests any written permission, at least one day in advance or, in the case of unexpected needs arising, at least within the first half hour of working time
30. Respect the holiday rounds agreed with the company
31. Promptly communicate any change of domicile and/or residence and give the company the obligatory documentation
32. Present himself to work in a dignified manner and with clothing that does not involve health and safety problems, and to behave correctly and urbanely.
33. Do not carry out gifts or other benefits on his own initiative to Public Officials, Customers, Consultants or other figures indicated by them, and not to deliver on account of KATO IMER S.P.A. gifts or other utilities without

authorization expressed by the Legal Representative and always in compliance with the principles of the Code of Ethics.

34. Comply with the provisions of the Company Code of Ethics in force in terms of behavior, communication and collaboration obligations. Any violation of the Code of Ethics that is ascertained by the Company may be subject to sanctions and disciplinary measures imposed according to the procedures established by the CCNL of reference and by Law 300/1970 and ss.aa. and ii.

2.6 Specific regulation for the use of corporate IT tools

The employees and collaborators of KATO IMER S.P.A. are required to comply with the following rules and behavioral rules, the failure to comply with, involves the direct assumption of responsibility arising from misconduct and determines, in application of the current national collective labor agreement, the contestability of behavior susceptible to measures disciplinary:

(a) to avoid the serious danger of introducing computer viruses into corporate information systems, only installed programs or data used by management may be used. In particular, it is forbidden to download files and software - even free - taken from Internet sites, unless expressly authorized by the Company Management or delegated function.

b) it is not allowed to use computer programs or tools to intercept, falsify, alter or suppress the contents of communications and/or IT documents for illegal purposes

c) avoid copying files of uncertain or external origin on magnetic/optical media for purposes not related to one's work performance

d) network units and management applications are areas intended to share strictly professional information and cannot be used for different purposes. Therefore, not even temporarily, in these areas, files that are not relevant to the work activity should not be placed.

e) the use of removable external media not owned by the company is not allowed, the staff is always required to use, also with external parties, removable corporate media, avoiding in any case, to place external third-party support in the company network. Before delivering the company removable media to other employees / external parties, check that there are no confidential documents / data or documents / data whose sharing has not been previously authorized by the Management.

f) it is not allowed to access websites with content that is criminally relevant, in case the worker or collaborator involuntarily accesses these sites it is his duty to promptly inform the legal representative of the fact.

g) it is not allowed to carry out any kind of financial transaction through the Internet, including remote banking transactions, online purchases and similar, except in cases where the functions are performed and compliance with the normal purchasing procedures .

h) it is recommended to avoid any form of registration, even personally, on sites whose contents are not related to work.

i) it is not allowed to participate, for non-professional reasons, in forums, the use of chat lines, electronic bulletin boards even using pseudo mini or fancy names.

j) e-mail, both internal and external, is a means of communication made available to the employee to enable him to carry out his work. Private e-mails are to be considered as ordinary correspondence for which the employee is required to provide separate e-mail addresses for the purpose of sending and receiving private messages.

k) any written communication (internal / external) sent and / or received through computer systems and / or fax that concerns or contains commitments for the company must be viewed and authorized by the Management; if incoming, it must be handed over to the management.

2.6.1. Instructions for persons in charge of data processing on computer support

- For the purposes of this document, "Computer System" means any computer system in which there are data that the Customer or User is entitled to, in the form of databases, or even just a portion of them.
- • For access to computer systems, authentication credentials are given to the Distributor. These credentials are strictly individual and must not be communicated or made known by anyone. Only the Manager is aware of all the credentials assigned to the Distributors to ensure the performance of work activities in the event of absence or impediment of the incharged.
- • Access to the Information System must be protected by an authentication procedure based on identification credentials uniquely associated with the person in charge or the data processors.
- • The confidential component of the credentials (for example the password) must be kept secretly by the Data Processor, any devices containing the reserved part of the credentials (cd-card, smart-card, or other storage medium) must be kept with the maximum care by the Authorized person in a locked place
- • Each Distributor who will use the Computer System will have to take appropriate precautions to protect the system during its absence from the session treatment, with the use of the keyword at the start of the work session and for the screen-saver.

- In the event of prolonged absence or impediment of the Data Processor on the Information System, the credentials associated with the Disclosure no longer operational will be rendered unusable.
- It is absolutely forbidden to make public or communicate to others their personal access password.

3. Disciplinary measures

The company informs all its employees that for the verification of violations of this code of ethics and disciplinary direct and indirect controls may be arranged, using appropriate means to ascertain the facts in compliance with the rules on privacy and the rights of persons subject to assessment. **The entire staff, directors, members and collaborators who become aware of acts or conduct falling within the cases specified above are required to communicate the circumstances to both the Supervisory Body and the Legal Representative.** Except in cases where the worker's behaviour is criminally significant, in which cases the dismissal for "just cause" can always take place, the adoption of disciplinary measures, for violation of the duties incumbent on the worker, will be carried out in compliance with the rules contained in the 'art. 7 L. 300/1970 and ss.aa. and ii., and of the current category CCNL. The worker who in any way transgresses the provisions of the disciplinary regulation or who, in any case, commits a deed that is prejudicial to morality, hygiene, and discipline, is involved in the provisions. The company cannot take any disciplinary measures against the worker, without having previously challenged the charge and without having heard him in his defence. The worker may be assisted by a representative of the Syndicate to which he is a member or gives a mandate.

Text approved by the Legal Representative on 10/01/2018

Trade unions representants:
