

CODE OF ETHICS AND CONDUCT

The company Olimpia S.r.l. (“The Company” henceforth) shares, recognizes and is committed to acting in compliance with the highest moral and ethical values in the management of its activities, inspired by the principles of impartiality, fairness and transparency and in compliance with current legislation at international and national level.

This Ethical Charter (“Ethical Charter” henceforth) is to be considered as the expression of principles and values recognized by the Company in the conduct of its business.

Any non-compliance with the Ethical Charter from a supplier it is to be considered as a serious violation such as to determine the interruption of trading relations between the parties, in accordance with the conditions provided by the law, even when the aforementioned are not formalized by a written contract without prejudice to any other rights and actions that the Company could exert.

Social Responsibilities and Requirements

The Company is committed to complying with the laws, regulations, rules and customs with regard to labour in force in Italy, in particular what pertains to the following rules considered to be of key importance:

Illegal employment and forced labour: it is strictly forbidden to employ manpower unqualified to exert an independent or professional activity and the use of manpower coming from professional groups or geographic areas that are not explicitly stated in our terms of service.

Therefore it is forbidden to employ non-consenting subjects or employees required to perform compulsory labour. Any of the aforementioned should be regarded as unlawful along with any behavior apt to deny employees the capacity of self-determination.

Child Labour: it is strictly forbidden to use child labour. Under the expression of “child” it is meant to refer to any individuals under the minimum legal age to work in compliance with the local laws. The same applies to those individuals who have not yet finished compulsory education.

Harassment and abuse (mobbing): employees should be treated with respect and dignity. It is strictly forbidden to inflict physical punishments, to practice moral or psychological harassment and, in general, any abuse which causes damage or prejudice.

Discrimination: the company commits to treat each of its employees with respect and dignity regardless of sex, race, religion, age, state of health, sexual orientation, ethnicity, political, personal and social opinions. Consequently it complies to a fair and correct approach in matter of recruitment, access to continuing education, promotions and dismissals. It recognizes freedom of expression and association of each employee.

Freedom of expression and association: each worker is recognized, without sanctions or discrimination of any kind, the right to collective negotiation, the right to found, to join and/or to

attend a trade union of his free choice. Furthermore, our Suppliers guarantee, in all circumstances, the inviolable right of each to the free expression of their thoughts through the word, writing or any other means of communication.

Health and safety: The Company is committed, in relation to the specific risks associated with its industrial sector, to offer a healthy and safe working environment in order to avoid any type of accident or bodily harm that could be caused by the employment or that could occur during working hours or in any case at the workplace. For this reason it sets up systems that are capable of preventing, avoiding or neutralizing the risks involving the health and safety of its workers in compliance with the provisions of the current - national, co-unitary and international - regulations and laws.

Employment relationship: we have serious obligation with regard to (i) complying with the law and regulations in matter of labour, in particular what pertains remuneration and working hours, (ii) application of legal provisions regarding the employment relationship (recruitment, dismissals, etc.) including - in salaries - the fulfillment of any compulsory contributions (tax contribution, social security contribution, insurance contribution etc.) by the employer, granting that each employee and co-worker are in good standing with collective agreements, company agreements or any other provisions pertaining collective or individual negotiation that may be applicable.

Conduct of Business

The company is also committed to carrying out its business loyally, in good faith, diligently, effectively and fairly in terms of:

Compliance with the law: to act always and in any way in compliance with the current - national, community and international - law and regulations in force in its specific sector of activity.

Administrative and budgetary management: the preparation of the financial statements and any other type of accounting documents must comply with the laws and regulations in force, adopt the most advanced accounting practices and principles and be inspired by the principle of transparency, faithfully representing acts of management according to criteria of clarity, truthfulness and correctness in compliance with internal procedures.

Relations with the Public Administration: regarding the relations with Public Administration, the Company is committed not to offer, directly or through third parties, money or other benefits to the public official involved, to his family members or individuals in any way connected. Therefore the Company is also committed not to seek or establish personal relationship of favor, influence, interference which aim to affect, directly or indirectly, the activity.

Customs and Security Authorities: compliance with applicable customs laws, including those concerning the approach and prohibition of transshipment of goods in the importing country.

Anti-corruption: commitment to condemn and take action against corruption in all its forms, including extortion of funds and bribes.

CONFIDENTIALITY AND INTELLECTUAL PROPERTY

Particular attention is paid in order to keep information private and confidential. The Company is committed not to disclose to third parties any notion or information of any kind (including samples, collections and products) related to customers. Special care is given to keep private any data that was collected through the relationship with the Company, regarding activities carried out for the Company or in any way relatable and referable to this Company and not to make direct or indirect use of it through intermediaries, in the interest and respect of their own and others.

The use of trademarks and distinctive signs used by the Company in the context of its business is permitted only for the purpose of identifying the manufactured products, in accordance with the customers or licensors' directives.

ENVIRONMENTAL PROTECTION

The Company operates to create a safe and clean environment.

To this aim, the Company adopts:

- Implementation of an effective environmental management system;
- Suitable techniques for the treatment of waste, emissions to air and discharge to water and soil, in particular harmful emissions or waste cannot be improperly abandoned or discharged in the environment;
- Adequate continuing education and development of staff skills whose activities could cause a direct impact on the environment. The Company grants each employee the necessary means to carry out their tasks.

Date

Olimpia srl