

THE COMPANY ETHICAL CODE OF BEHAVIOUR

ANODICA TREVIGIANA S.p.A. pledges to respect the highest ethical standards

The following aspects will be under close supervision:

- That a standard of excellence will be maintained in all aspects of its activities in any country of the world.
- That a responsible ethical behaviour be maintained in all activities.
- All individual rights be respected and guaranteed.
- Guaranteed the respect for the environment.

ANODICA TREVIGIANA S.p.A. will maintain the following duties, and expects the same to be done by all of its suppliers:

Infant/Minor Workforce:

Infant/minor underage workers will never be used.

A "minor" means any person under the age of 15 years old (14 where local law allows). In all cases the minimum age in which compulsory education is completed will be respected.

Obliged/Forced Work:

Forced work will not be used, neither work carried out by prisoners, nor by people who are in any way repaying a social debit or similar situation.

Health & Safety:

A safe, healthy workplace will be provided in accordance with all existing norms, equipped with drinking water and sanitary facilities. Fire prevention is guaranteed. A suitable ventilation and lighting system provided. All health & safety standards will be ensured even in the accommodation which might be provided to our own collaborators.

Freedom of Association and the Right to Contract Collectively:

The rights of the employees to freely associate, organize and contract collectively with the employer legally and peacefully, without any kind of interference or fine, will be respected.

Discrimination:

No form of discrimination will be applied when employing or dealing with staff (especially regarding the salaries, promotion, disciplinary action, sacking or retirement), based on breed, religion, age, nationality, social or ethnic origin, sexual orientation, type, political opinion or handicap.

Disciplinary Procedures:

Towards the internal collaborators no kind of physical punishment, threats or any other form of physical, psychological or sexual intimidation will be used.

Hours of Work and Salaries:

The collaborators will be paid sufficiently to cover all primary needs. As a minimum, it is requested the complete conformity with the set minimum applied salaries and relative working hours. In particular, the regulations relating to guaranteed minimum salary, overtime, maximum working hours, piece rate system and other elements which are part of the payment of the salary. All requirements will be fulfilled in accordance with existing laws and regulations. Except for exceptional cases governed differently by the law, the Company pledges not to exceed the 48 working hours weekly or the 12 hours daily. If the local law does not regulate the working hours, the 12 hours of overtime of the normal working hours will not be exceeded. At least 1 day off weekly will be guaranteed.

The Company pledges to pay all overtime of its collaborators as requested by applicable laws. Where no regulation may exist, overtime will be paid in accordance with the agreed hourly sum.

Subsuppliers/Subcontractors:

ANODICA TREVIGIANA S.p.A. requests their own suppliers to respect and inform us of the eventual use of subcontractors/subsuppliers for the production of its products or components used by ANODICA TREVIGIANA S.p.A.

The use of subsuppliers/subcontractors must be explicitly authorized by ANODICA TREVIGIANA S.p.a., and is subject to the acceptance of the named subsupplier/subcontractor by the Company Ethical Code of Behaviour of ANODICA TREVIGIANA S.p.a.

Respect of the Environment:

The Company pledges to show its own conformity with the applied rules and regulations.

Legal Regulation:

The Company pledges to respect all rules and regulations applied to the products of ANODICA TREVIGIANA S.p.a., including those related to production, labelling and distribution of the product. Included in the legal regulation all National and International Technical Standards, either voluntary or obligatory.