

ANODICA TREVIGIANA S.p.A. Società Benefit is committed to respecting the highest ethical standards, including the Ethical Code of Conduct in its company policy. The Company has also adopted an Organisational and Management Model pursuant to Legislative Decree 231/01 of which this Code of Ethics is part and of which it summarises the principles and rules which the Company draws inspiration from for the prevention of predicate crimes of the aforementioned legislation. Through this Code of Ethics, the Company intends to define and explain the values and principles of behaviour that inform its activity and its relationships towards all the subjects with whom it enters into relations for the achievement of its corporate purpose with the aim of preventing irresponsible or illicit by all those who operate in the name and on behalf of the Company itself.

The following aspects will be under close supervision:

- a standard of excellence will be maintained in all aspects of its activities in any country of the world.
- a responsible ethical behaviour will be maintained in all activities.
- all individual rights will be respected and guaranteed.
- the respect for the environment and the principles of health and safety legislation in the workplace are guaranteed.

ANODICA TREVIGIANA S.p.A. Società Benefit 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 16 years old. In all cases the minimum age in which compulsory education is completed will be respected.
Obligated/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, organise and contract collectively with the employer legally and peacefully, without any kind of interference or fine, will be respected. To employees it's also guaranteed the right to join any trade union recognized nationally or locally.
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 40 working hours weekly; 12 hours of voluntary 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.

Suppliers

ANODICA TREVIGIANA S.p.A. Società Benefit requests their own suppliers to respect SA8000 standards and the availability to be audited on their sites.

Sub suppliers/Subcontractors

ANODICA TREVIGIANA S.p.A. Società Benefit requests their own suppliers to respect and inform us of the eventual use of subcontractors/sub suppliers for the production of its products or components used by ANODICA TREVIGIANA S.p.A. Società Benefit. The use of sub suppliers/subcontractors must be explicitly authorised by ANODICA TREVIGIANA S.p.a. Società Benefit, and is subject to the acceptance of the named sub supplier/subcontractor by the Company Ethical Code of Behaviour of ANODICA TREVIGIANA S.p.a. Società Benefit.

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. Società Benefit, 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.


No-Gift policy from suppliers

Anodica employees and collaborators cannot accept nor solicit gifts or benefits of any kind from Suppliers.

Suppliers undertake not to offer gifts or benefits of any kind to Anodica employees and collaborators, so that business relations are not influenced or contaminated by a conflict of interest or the semblance of it.

Signature of acknowledgement:

(Supplier)

DRAFTED	VERIFIED	APPROVED
DG	AQ	AD
	Roberto Tasso	