	<p>ALPES s.r.l. ORGANISATIONAL MODEL CE - CODE OF ETHICS</p>	<p>Rev. n. 01 of 04/01/2020</p>
---	--	---

CODE OF ETHICS - CE



	ALPES s.r.l. ORGANISATIONAL MODEL CE - CODE OF ETHICS	Rev. n. 01 of 04/01/2020
---	--	--

TABLE OF CONTENTS

TABLE OF CONTENTS	2
1 STRUCTURE OF THE CODE OF ETHICS AND SCOPE OF APPLICATION	3
1.1 INTRODUCTION TO ETHICAL VALUES	
1.2 THE LEGISLATIVE DCEREE No. 231 OF 8 JUNE 2001	3
2 THE PRINCIPLES AND STANDARDS OF THE CODE OF ETHICS	4
2.1 GENERAL RULES OF CONDUCT	4
2.2 THE REFERENCE ETHICAL PRINCIPLES	4
2.2.1 HONESTY	4
2.2.2 LEGALITY	4
2.2.3 TRANSPARENCY	5
2.2.4 RESPONSIBILITY TOWARDS THE COMMUNITY	5
2.3 RULES FOR RCEIPIENTS	5
2.3.1 FAIRNESS	5
2.3.2 CONFIDENTIALITY	5
2.3.3 RESPCET FOR THE DIGNITY OF THE PERSON	5
2.3.4 TRACEABILITY OF OPERATIONS AND TRANSACTIONS	6
2.3.5 OUTSIDE COMMUNICATION	6
3 ETHICAL PRINCIPLES IN RELATIONS WITH STAFF AND COLLABORATORS	6
3.1 GENERAL CONDUCT CRITERIA	6
3.2 STAFF SELCETION AND RCERUITMENT	6
3.3 FORMALIZATION OF THE EMPLOYMENT RELATIONSHIP AND EMPLOYEE MANAGEMENT	7
3.4 TRAINING OF RESOURCES	8
3.5 SAFETY, PROTCECTION OF HEALTH AND WORKING CONDITIONS	8
3.6 PROTCECTION OF THE PERSON	9

	ALPES s.r.l. ORGANISATIONAL MODEL CE - CODE OF ETHICS	Rev. n. 01 of 04/01/2020
---	--	--

1 STRUCTURE OF THE CODE OF ETHICS AND SCOPE OF APPLICATION

1.1 INTRODUCTION TO ETHICAL VALUES

This document, the Code of Ethics (hereinafter the "Code"), defines the values and principles of conduct relevant to ALPES S.r.l. (hereinafter also "company") within the scope of its activities and any of its subsidiaries and associates for the purposes of proper functioning, reliability, compliance with laws and regulations in force in all countries in which the company operates, as well as for its reputation.

It contains the set of rights, duties and responsibilities towards internal and external interested parties (employees, managers, customers, suppliers, internal and external collaborators and members of corporate bodies including the Supervisory Body).

The company deals with the production of steel cables, extrusion of plastic materials, drawing of steel wires.


Ethical principles, which will be set out in this Code of Ethics, are relevant for the purposes of prevention, to prevent the perpetration of crimes under Legislative Decree no. 231/2001 and are an essential part of the preventive control system.

All subjects who work for the achievement of the company's objectives are required, without exception, to observe this Code of Ethics in conducting the company's purposes and activities; these subjects take the name of "recipients" of the Code of Ethics. In no case, the pursuit of an interest or an advantage for the company can justify incorrect behaviour.

The Code of Ethics is approved by the top management of the company.

1.2 THE LEGISLATIVE DECREE No. 231 OF 8th JUNE 2001

It arises from the ratification and execution of international Acts drawn up on the basis of Article K. 3 of the Treaty of the European Union, such as the convention on the protection of the financial interests of the European Communities, made in Brussels on 26 July 1995, as well as other Community conventions and OECD for the regulation of the administrative liability of legal persons and entities including those without legal personality

	ALPES s.r.l. ORGANISATIONAL MODEL CE - CODE OF ETHICS	Rev. n. 01 of 04/01/2020
---	--	--

2 THE PRINCIPLES AND STANDARDS OF THE CODE OF ETHICS

2.1 GENERAL RULES OF CONDUCT

Each operation and transaction must be correctly executed, recorded, authorized, verifiable, legitimate, consistent and congruous. This means that each action and operation must be adequately recorded and must be supported by suitable documentation, in order to be able to carry out checks at any time that certify the characteristics and reasons and identify who authorized, carried out, verified the operation itself.

All subjects must inspire their activities to the principles of honesty and professional correctness, respecting the laws and regulations in force and orienting their actions to the principles, objectives and commitments referred to in this Code.

All operations and transactions carried out must be inspired by compliance with current regulations, maximum management correctness, completeness and transparency of information and both formal and substantial legitimacy. Furthermore, they must be carried out in compliance with the instructions and procedures, as well as within the limits of the powers received. In any case, all subjects must refrain from engaging in or attempting to engage in conduct that could integrate the so-called "Prerequisite" crimes indicated in the Decree.

2.2

THE REFERENCE ETHICAL PRINCIPLES


2.2.1 HONESTY

Honesty is the fundamental principle for all the company's activities, for its initiatives, and constitutes an essential value of organizational management.

Relations with stakeholders, at all levels, must be based on criteria and behaviours of correctness, collaboration, loyalty and mutual respect.

2.2.2 LAWFULLNESS

The company undertakes to comply with all national and international rules, laws, directives and regulations and all generally recognized practices, and also inspires its decisions and behaviour to the care of the public interest entrusted to it.

	ALPES s.r.l. ORGANISATIONAL MODEL CE - CODE OF ETHICS	Rev. n. 01 of 04/01/2020
---	--	--

2.2.3 TRANSPARENCY

The company undertakes to operate in a clear and transparent manner, without favouring any interest group or individual, avoiding misleading situations in transactions carried out on behalf of the company.

2.2.4 RESPONSIBILITY TOWARDS THE COMMUNITY

The company, aware of its social role in the reference territory, on economic and social development and on the general well-being of the community, intends to operate in respect of local and national communities, supporting initiatives of cultural and social value.

2.3 RULES FOR RECIPIENTS

The subjects required to comply with the Code of Ethics are defined as "Recipients", as already defined in the introduction, and are bound by the following principles:

2.3.1 FAIRNESS


Compliance with the ethical and professional rules applicable to transactions carried out on behalf of the company.

2.3.2 CONFIDENTIALITY

Confidentiality of known information and processing of data, including sensitive data, as defined by Regulation (EU) 2016.679 (Data Protection Act) exclusively within the context and for the purposes of their work activities, on the occasion of transactions carried out on behalf of the company.

2.3.3 RESPECT FOR THE DIGNITY OF THE INDIVIDUAL

In internal and external relations, behaviours that have a discriminatory content based on political and trade union opinions, religion, racial or ethnic origins, nationality, age, sex, sexual orientation, state of health and in general any intimate characteristic of the human being are not allowed.

	ALPES s.r.l. ORGANISATIONAL MODEL CE - CODE OF ETHICS	Rev. n. 01 of 04/01/2020
---	--	--

2.3.4 TRACEABILITY OF OPERATIONS AND TRANSACTIONS

Each action and operation must be adequately recorded and supported by suitable documentation to proceed in carrying out checks that certify the characteristics and reasons and identify who authorized, carried out, registered, verified the operation itself at any time.

2.3.5 EXTERNAL COMMUNICATION

Each communication activity must comply with the laws and rules of professional conduct and must be carried out with clarity, transparency and timeliness; under no circumstances is it permitted to disclose false or biased news or comments.

3 ETHICAL PRINCIPLES IN RELATIONS WITH STAFF AND COLLABORATORS


3.1 GENERAL CONDUCT CRITERIA

The employee must act loyally in compliance with the obligations underwritten in the employment contract, with the provisions of the Code of Ethics and company regulations, ensuring high standards of performance. He must absolutely avoid behaviours that damage the company's assets, the relationship with the interested parties and the image towards the outside world. The decisions, made by each one, must be based on principles of sound and prudent management, carefully assessing potential risks, in the awareness that personal choices contribute to the achievement of positive company results.

All operations and transactions must be inspired by the utmost correctness from the point of view of management, completeness and transparency of information, legitimacy under the formal and substantive aspect.

3.2 STAFF SELECTION AND RECRUITMENT

The evaluation of the candidacies must be carried out on the basis of the correspondence of the candidates' profiles, the needs and requirements of the company, respecting equal opportunities for all interested parties, rejecting any form of favouritism, nepotism or cronyism, favouring decisional and evaluation processes based on commonly shared objective criteria.

	ALPES s.r.l. ORGANISATIONAL MODEL CE - CODE OF ETHICS	Rev. n. 01 of 04/01/2020
---	--	--

The information requested from candidates must be strictly connected to the verification of the professional and psycho-aptitude profile of the individual, as well as to the verification of compliance with the national and international legal requirements and suitability in relation to the prevention of the crimes referred to in Legislative Decree 231 / 2001, always in compliance with the principles of non-discrimination and protection of personal data, defined in this Code of Ethics and provided for by law. Employee privacy is protected by adopting standards that specify the type of information to be requested from the employee and the related processing and storage methods. Any investigation into ideas, preferences, personal tastes and, in general, information of collaborators not relevant to the purposes of personnel selection and management of the employment relationship is excluded, according to the criteria indicated in this Code of Ethics. These standards also provide for the prohibition, except for the cases provided for by law, to communicate or disclose personal data without the prior consent of the interested party.


3.3 FORMALIZATION OF THE EMPLOYMENT RELATIONSHIP AND EMPLOYEE MANAGEMENT

The staff is hired with a regular employment contract and no form of irregular work is tolerated.

All company staff favours maximum collaboration and transparency towards the new employee, so that the latter has a clear awareness of the assignment assigned to him; at the establishment of the employment relationship each employee must receive accurate information relating to:

- characteristics of the function to which they belong, responsibility for their role and tasks to be performed;
- regulatory and remuneration elements as regulated by the national collective bargaining agreement or by collaboration agreements;
- rules and procedures to be adopted in order to avoid conduct contrary to the law and company policies.

This information is presented to the employee so that the acceptance of the assignment is based on a proper understanding.

	ALPES s.r.l. ORGANISATIONAL MODEL CE - CODE OF ETHICS	Rev. n. 01 of 04/01/2020
---	--	--

Every manager is required to enhance the employees' working time by requesting performance consistent with the exercise of their duties and with the organization of work plans.

It is an abuse of the position of authority to request, as an act due to the hierarchical superior, services, personal favours or any behaviour that constitutes a violation of this Code of Ethics. The involvement of employees in carrying out work is ensured also by providing moments of participation in discussions and decisions functional to the achievement of the company's objectives. The employee should participate in such moments with a spirit of collaboration and independence of judgment.


3.4 RESOURCE TRAINING

The company provides all employees with information and training tools with the aim of enhancing the specific skills and implementing the professional value of the staff. Institutional training is carried out, provided on certain occasions / moments; for example, for new recruits, training relating to safety at work, to the Legislative Decree no. 231/2001 and to the relative risk prevention, training targeted on the basis of needs spceifiche.

3.5 SAFETY, SAFEGUARD OF HEALTH AND WORKING CONDITIONS

The company is committed to spreading and consolidating a culture of safety and health at work by developing risk awareness and promoting responsible behaviour by all collaborators.

The company favours working conditions that protect the psycho-physical integrity of people by providing workplaces that comply with current health and safety regulations. The employee, however, must comply with all applicable laws and standards regarding safety and environmental protection and respect company policies. In relation to the culpable offenses provided for by art. 25-septies of Legislative Decree no. 231/2001, the company will clearly explain and make known, by means of a formal document, the fundamental principles and criteria on the basis of which decisions, of all types and at all levels, regarding health and safety in the workplace are taken; these principles and criteria will be identified for:

	ALPES s.r.l. ORGANISATIONAL MODEL CE - CODE OF ETHICS	Rev. n. 01 of 04/01/2020
---	--	--


- a) avoiding risks;
- b) evaluating the risks which can not be avoided;
- c) combating the risks at source;
- d) adapting the work to the individual, in particular as regards the design of jobs, the choice of equipment, the working and production methods, in particular, to alleviating monotonous work, repetitive work and to reduce the effects of these works on health;
- e) taking into account the degree of evolution of tecnica;
- f) replacing what is dangerous with what is not dangerous or which is less dangerous;
- g) planning prevention, aiming at a coherent complex that integrates in the same the tcenics, work organization, working conditions, social relations and the influence of the factors of the working environment;
- h) giving priority to collective protection measures over individual protection measures;
- i) giving appropriate instructions to workers.

These principles are used by the company to take the necessary measures to protect the safety and health of workers, including the prevention of occupational risks, information and training, as well as the preparation of an organization and the necessary means.

The whole company, both at management and operational levels, must abide by these principles, in particular when decisions must be made or choices made and, subsequently, when they must be implemented.

3.6 PROTECTION OF THE INDIVIDUAL

The company undertakes to protect the moral integrity of its collaborators by guaranteeing the right to working conditions that respect the dignity of the person. For this reason, acts of physical or psychological violence, sexual harassment, any discriminatory or harmful attitude or behaviour of the person, his beliefs and preferences are not tolerated. Employees who believe they have been subjected to harassment or have been discriminated against for reasons related to age, sex, race, state of health, nationality, political opinions and religious beliefs etc., can report the incident to the Supervisory Body which will assess the violation of the Code of Ethics.

	ALPES s.r.l. ORGANISATIONAL MODEL CE - CODE OF ETHICS	Rev. n. 01 of 04/01/2020
---	--	--

4 IMPLEMENTATION AND CONTROL OF THE CODE OF ETHICS

It is up to the Supervisory Board to facilitate and promote awareness of the Code by means of appropriate communication and dissemination activities through information and training programs defined according to the rules established by the Organizational Management and Control.

Furthermore, the same provides for the periodic review of the Code of Ethics, receiving and analyzing the reports of violations of the Code of Ethics by all the interested parties. The Code of Ethics is distributed to all employees in the recruitment phase and to all third parties who enter into business relationships with the company, even for parts or extracts of related interest..

It is the responsibility of each employee to consult their direct manager for any clarification relating to the interpretation or application of the rules of conduct contained in the Code of Ethics.


5 DISCIPLINARY SYSTEM AND SANCTIONING MECHANISMS

Any behaviour contrary to the letter and spirit of the Code will be sanctioned according to the seriousness of any infringements committed, in compliance with the provisions of the disciplinary system defined by the Organizational Model, to which reference should be made, of which the Code of Ethics is an integral part.

The disciplinary system is aimed at employees, managers, suppliers, customers, internal and external collaborators and members of corporate bodies including the Supervisory Body.

With regard to sanctions, in the case of an employment relationship, any sanctioning measure must comply with the procedures provided for by art. 7 of the Workers' Statute and / or by special regulations and / or the provisions of collective chaffer and disciplinary codes of the company where applicable.

The definition of an adequate disciplinary system is an essential prerequisite for the correct applicability of an organizational and control model inspired by principles of lawfulness, transparency and ethics. This principle also finds further confirmation in the regulatory basis of Legislative Decree 231/2001, for the purpose of defending the model itself with respect to the administrative liability of entities.

	ALPES s.r.l. ORGANISATIONAL MODEL CE - CODE OF ETHICS	Rev. n. 01 of 04/01/2020
---	--	---

If the rules contained in this Code and in the other provisions in force concerning the prevention of offenses are not respected, the sanctions provided for in the Organizational Model will be applied, even if the "unethical" event does not come to fruition.

The complaint, the investigation of offenses and the application of disciplinary sanctions shall be borne by the company's governing bodies, in accordance with the powers conferred in proxies and competences.

Infringements by third parties shall be sanctioned according to the criteria indicated in the specific contractual clauses that must be provided for.