

	<h1>ETHICAL BEHAVIOUR MANUAL</h1>	Date: 28/01/2019
Prepared by: Management 	Approved by: DdL. Mr. Redini Marco 	Rev.: 02

TRERÈ INNOVATION aims at being the leader in the markets where it operates and therefore it intends to ensure an irreproachable image and reputation and to become known on the international market as a Company that pursues its **business objectives in an ethically correct and responsible manner**.

To this purpose TRERÈ INNOVATION has prepared an Ethical Behaviour Manual containing the **principles and standards of behaviour** both toward its employees and third parties.

These standards are based on the main international regulatory frameworks, but TRERÈ INNOVATION pays special attention to those it considers of the utmost importance for its image and reputation:

a. Integrity in the business transactions – The presence of TRERÈ INNOVATION on the international markets as well as its **relationships with the customers are exclusively based on a**

competitive offer of its products and services. The concepts of innovation, continuous improvement of quality and fair price are the cornerstones used to challenge the competitors with high performance and better products .

b. Corruption – **No corruption practice is fostered or put in place** by our employees or toward our customers/suppliers in order to obtain unlawful business benefits, such as money, private offers of travels or events, entertainments and gifts that are incommensurate to the commercial relationship and that have not been officially agreed upon between the concerned companies.

c. Conflict of interest – In the interest of TRERÈ INNOVATION all **decisions are taken upon assessment of objective data** and according to impartial criteria. **The business partners are selected on grounds of merit and ability** to bring added value to the company's products. In no case any family relations, friendships or


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any other special relationship may affect any company's transaction nor constitute an advantage or a selection criterion.

- d. Second employment – TRERÉ INNOVATION's employees and collaborators shall not engage in any **activity that is in competition with the Company**; they shall have no personal interest in the transactions entrusted to them and they shall not obtain any private advantages in concluding such transactions.
- e. Protection of the company assets – TRERÉ INNOVATION, through its employees and the allocated resources shall take all the measures necessary to **keep and maintain in the best conditions of efficiency the material assets** consisting of machinery, plants, buildings, equipment, and IT system (as described in the "Regulation for the use of the company IT resources"), together with any intellectual property and information which refer to the industrial secrecy. TRERÉ INNOVATION intends to raise awareness in its

employees concerning the fact that this set of assets constitutes a guarantee of the competing position on those marketplaces that TRERÉ INNOVATION intends to develop stronger.

- f. Safety of the production site – TRERÉ INNOVATION considers of the utmost importance to carry out an accurate assessment of the risks that may be present within the company, according to Legislative Decree no. 81/08 – Consolidated Act concerning Health and Safety on the workplaces. The company risk prevention system is described in detail and continuously updated by making use of the Risk Assessment Document.
- g. IT system safety – All employees and collaborators shall comply strictly with any provisions and instructions contained in the "Regulation for the use of the company IT resources".
- h. Accounting and administration integrity – TRERÉ INNOVATION undertakes to keep a complete internal documentation based on its

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computerized management information system. The Board of Auditors will be able to carry out **suitable audits in order to ensure the integrity** and correctness of the accounting and administration system. This also applies to the auditing firm entrusted with auditing the financial statements of the year, with which exchanges of information are kept on a regular basis and meetings are organized to know how the company is performing.

- i. Confidential information – TRERÈ INNOVATION has already communicated its intention of **keeping confidential some of the information** to which its employees may have access during the performance of their tasks.. The Company will take all the necessary measures to prevent an undesired disclosure of information and it will firmly condemn any attempt to misuse the internal information of the Trerè Innovation Group for any personal advantage.