

Subject: Adoption of the Organizational, Management and Control Model, ex LEGISLATIVE DECREE 231/01 and Legislative Decree 81/2008.

Dear Client/Supplier,

As you will know, **Legislative Decrees 231/01** and **81/08** introduced the "*Regulation of legal entities, companies and associations even if without legal entity status*" adjustment of Italian regulations to a number of international conventions.

Therefore, ***for criminal proceedings***, a responsibility for companies has been established alongside that for physical persons being material perpetrators of illegal conduct, with grave consequences in terms of financial and restrictive sanctions.

The legislator means to punish those company structures which commit:

- either unlawful acts pertaining to health and safety at work;
- or unlawful acts regarding aspects of an environmental character;
- or computer crimes and connected with unlawful handling of data;
- or company crimes;
- or crimes against Finance, Industry and commerce;
- or acts of corruption with regard to Public Administration Bodies;
- or crimes in relation to employing non EC workers;
- or violations against identified values and ethical principles.

Our company, in conformity with the prescriptions of the decrees and on the basis of the Guide Lines indicated in the model, with the aim of always ensuring conditions of correctness and transparency in the conduct of business and company activities, has considered that the adoption of an **ORGANIZATIONAL, CONTROL AND MANAGEMENT MODEL** conforms with its company policy.

That is substantially founded on a structured and organic system of procedures and activities, identifying the areas and processes of possible risk in the company activities, or rather that those activities in which sphere it is considered that there is the greatest possibility of crimes being committed.

This regards a system of company self-discipline, which application is subjected to a System of Vigilance.

The company has furthermore equipped itself with a **Code of Ethics** which governs and regulates the conduct of all its employee which must be carried out in a framework of:

- **Transparency:** All operations, actions, conducts placed into being by the work activities must be aimed at correctness, transparency, maximum clarity and truthfulness, as well as legitimacy under the aspect of formality and substantially;

- **Honesty:** Constitutes an essential element of good company management;
- **Impartiality:** In adopting its resolution, Biofer was inspired to safeguard and promote human rights, avoiding any kind of discrimination in relation to age, sex, health conditions, race, nationality, political opinions and religious beliefs of its representatives;
- **Entrepreneurship:** The company objectives, the promotion and realization of projects and investments must be shaped by the criteria of economy and efficiency to result in solutions and services with a heightened relationship between quality and cost, as well as to increase Biofer's asset, management and technological values;
- **Reciprocal respect:** All activities are carried out in the spirit of reciprocal respect;
- **Traceability:** All company activities must be suitably recorded in such a manner as to permit verification of decision, authorization and execution processes;
- **Client satisfaction:** Given the reference ethical principles, Biofer affirms the importance of attaining the total satisfaction of clients with the products supplied. For achieving such, the Company pursues the definition and maintenance of elevated standards of quality in relation to the market, the constant commitment to innovation of processes and products and monitoring the satisfaction clients;
- **Value of human resources:** The Company promotes and safeguards the value of its human resources, with the aim of maximising satisfaction and growing professionalism with regard to the dignity of the person. It values "savoir faire" and "knowing how to inspire" as development initiatives and the maintenance of leadership in its sector.

The above listed principles must influence the company's commercial relationships with its clients and suppliers, with which it is committed to developing relationships of correctness and transparency.

In particular, the selection criteria of the same are subordinate to objectives and transparent evaluations of their professionalism and business structure, as well as the esteem and consideration they enjoy in the market.

Thereby, suppliers and clients are persuaded to carry out their activities following standards of conduct which mirror those indicated in the Code of Ethics adopted by our company.

Yours sincerely,

Biofer S.p.a.