

Special Section A

CODE OF ETHICS

Angelo Po Grandi Cucine S.p.a.

Carpi, May 2017

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SECTION 1 - INTRODUCTION

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The Code of Ethics of Angelo Po Grandi Cucine S.p.a.:

- encompasses all the rights, duties and responsibilities of the Company with respect to all the persons with whom it relates in order to achieve its corporate purpose (customers, suppliers, employees and/or collaborators, shareholders, institutions); it is therefore a directive whose rules of conduct must be taken into account in the daily work and which presupposes, first of all, compliance with existing laws and regulations, including those of the Company;
- aims to set ethical reference standards and behavioural rules to guide the company's decision-making processes and the conduct of the Company;
- requires the management and all the subjects to whom it is addressed coherent behaviours, i.e. actions that do not appear, even in spirit alone, dissonant with respect to corporate ethical principles;
- contributes to the implementation of the corporate policy of the Group, with the awareness of the importance of focusing on social and environmental issues in order to minimise the company exposure to compliance and reputational risks, while strengthening the sense of belonging among its shareholders.

COMPANY POLICY

Angelo Po is constantly engaged in the achievement of quality objectives, environmental management, occupational health and safety, with a commitment to preventing accidents and illnesses and privileging preventive actions; this mission involves all group companies, entire business organisations, stakeholders, and every employee - regardless of their types of contract - that, aware of this responsibility towards the customers, addresses their actions and commitment to pursuit thereof.

The Company's Quality, Environment and Safety policy is defined and approved by the parent company's Board of Directors; Corporate Management requires that each Management implements and disseminates it to its employees at all levels.

Angelo Po, in particular, is committed to ensuring:

- the adoption and maintenance of procedures for the identification of hazards and the assessment of environmental and safety risks;
- the implementation of measures to eliminate or reduce such risks;
- the implementation of the necessary control and correction measures;
- the definition of continuous improvement objectives for the environment and safety, consistently with evaluations and controls;
- the commitment to consider health and safety at work and its results an integral part of business management by involving and consulting workers through their representatives.

In particular, Management assumes the responsibility to promote and disseminate this commitment through

an annual plan that, by identifying the areas most deserving of attention, prepares actions and resources to achieve the level of improvement expected from its customers, with particular attention to compliance with legal requirements and any other voluntary prescriptions that relate to their environmental, occupational health and safety aspects signed by the organisation.

The annual plan relating to quality improvement actions, environmental management and occupational health and safety are part of the Company's strategic plan and are approved by the Board of Directors and disseminated within the company; it is binding on all company employees, from management to operators.

The Company makes the policy known to interested parties through bulletin boards and availability on the corporate IT system. Hard copies may be provided to those who request it, subject to authorisation by Corporate Management.

The policy implementation status is periodically reviewed during the management review.

Hence, the Company commitment in five directions: a) to provide the human and instrumental resources needed; (b) to ensure that workers become aware and trained to carry out their duties; c) involve and consult workers, even through their security representatives; (d) periodically review the policy itself and the management system implemented; e) define and disseminate the safety objectives and related implementation programs within the company.

The company complies with the policies of the parent company Marmon Holdings Inc., in accordance with US laws and in particular, the FCPA.

The Company, in line with the policy of the parent company Marmon Holdings Inc., strictly complies with the laws and regulations that apply to the activities and operations carried out, or which may have a risk of liability for Marmon, Berkshire Hathaway Inc. ("Berkshire"), or Marmon Companies employees.

SECTION II - APPLICATION METHOD

Article 1: ADOPTION AND UPDATING

This Code, adopted by resolution of the Company's Board of Directors on **9 June 2017**, shall not be considered an unmodifiable document; it should be read therefore as a tool subject to be amended and supplemented according to changes that may occur inside or outside the Company, and the experience gained by the Company over time. All this in order to ensure full consistency between the guiding values assumed as fundamental principles of the Company and the behaviours to be held in accordance with this Code.

Article 2: RECIPIENTS

This Code is binding for shareholders, Corporate Bodies, Senior Management and employees, as well as for all those who, even outside the Company, act directly or indirectly for the same.

It also applies to any agent, consultant, representative, sales agent, reseller, distributor, partner, customs agent, freight forwarder, external collaborator, third party representative or other authorised person to conduct business on behalf of the parent company Marmon Holding Inc.

All the aforesaid Recipients are therefore required to comply with and, as far as pertains to them, have the

principles contained in the Code of Ethics complied with. Under no circumstance does the claim to act in the interests of the Company justify the adoption of behaviours that are contrary to those set forth in this document.

Compliance with the provisions of the Code must also be considered an essential part of the contractual obligations of Company's employees pursuant to and for the purposes of the provisions of art. 2104 et seq. of the Italian Civil Code.

Article 3: CODE OF ETHICS, ORGANISATION AND MANAGEMENT MODEL AND GROUP COMPANIES;

The Organisation and Management Model complies with the requirements of this Code of Ethics, which forms an integral part thereof. In this respect, in fact:

- o the Code of Ethics is voluntarily adopted by the Company and expresses recognised values and principles of conduct as being the ones all recipients must comply with and the first means of preventing any offence;
- o The Organisation and Management Model pursuant to Italian Legislative Decree 231/01, inspired by the principles of the Code of Ethics, responds to specific statutory requirements in order to prevent the commission of particular types of offences.

The Company is committed to continuously improving internal procedures in order to make business management more effective and efficient by encouraging, inter alia, where possible, the use of IT tools, in order to reduce repetitive and merely executive activities, to the benefit of more professional ones, ensuring timely and punctual delivery of the requests by all customers and employees, with strict compliance with standards; through this, the Company solely pursues the company's and its shareholders' business interest.

The Parent Company requires that none of the subsidiaries put in place behaviours or make any decisions that are prejudicial to the Group's integrity and reputation. With respect to Subsidiaries' independence, the parent company requests the latter to incorporate the same values expressed in the Parent Companies Code of Ethics into their own, adjusting their own conduct in compliance with the law and regulations in force.

Whoever holds corporate positions or mandates within the Group has the duty to perform the assignments entrusted thereto with loyalty and fairness, to foster communication between the Group's companies, to solicit and use the intra-group synergies by cooperating in the interest of common objectives.

The circulation of information within the Group, in particular for the preparation of the consolidated financial statements and other communications, must take place in accordance with the principles of truthfulness, loyalty, fairness, completeness, clarity, transparency and prudence, respecting each company's independence and specific scope of business.

Article 4: TRAINING

The Company will include initiatives aimed at promoting knowledge of the values of behavioural norms referred to in this Code of Ethics in the annual training plan.

For newcomers, a training program is provided on the content of the Code of Ethics for the company's placement courses.

SECTION III - GENERAL PRINCIPLES

Article 5: VALUES

The actions, operations, transactions and, in general, all Recipients' behaviour in the exercise of the functions of their own competence and responsibility must be based on maximum integrity, honesty, fairness, loyalty, transparency, equity, objectivity and respect for the person and responsibility for the prudent use of environmental, social and corporate assets and resources.

Everyone, within the scope of the responsibilities associated with the role played, must provide the highest level of professionalism available to adequately meet the needs of customers and internal users.

Everyone must undertake to engage in their assigned tasks, contributing in a concrete way to the achievement of the company's goals and compliance with the values set forth.

The development of the spirit of belonging to the Company and the improvement of the corporate image are common objectives, which should constantly address the behaviours of each one.

Article 6: INTEGRITY, HONESTY, FAIRNESS AND LOYALTY

Respect for the values of integrity, honesty, fairness and loyalty involves, inter alia, that the Company undertakes to:

- promote and require compliance with internal regulations and/or any applicable law by staff, employees, customers, suppliers and any third parties with whom the company has a legal relationship;
- strictly comply with the applicable anti-money laundering legislation, in any case refusing to engage in any suspicious transaction in terms of fairness and transparency;
- promote practices aiming at preventing at all levels any corrupting local and transnational situations;
- ensure and promote the compliance with the internal organisational rules as well as the organisational rules and regulations contained in the Management and Organisation Model developed for the purposes of preventing any offence pursuant to Italian Legislative Decree 231/01;
- record each transaction only if it supported by the appropriate documentation, in order to proceed at any time with an accurate inspection to confirm the nature and reasons as well as to identify who has authorised, performed, recorded and checked it; therefore, the employees and/or partners shall keep the accounting records in an accurate, timely and complete way, while strictly conforming to the civil and tax legislation as well as the internal accounting procedures. Every record shall accurately describe the data contained in the supporting documentation, and shall be kept carefully and made available upon request for any possible verification.
- prevent the formation of groups within the Company consisting of three or more persons, with the specific purpose of engaging in any illegal conduct or accessing any type of relationship able to facilitate any form of organised crime.

Article 7: EQUITY, OBJECTIVITY AND PROTECTION OF THE PERSON;

The absolute value of the Company is the protection of personal safety, freedom and individual personality. The company, therefore, repudiates any activity that may entail the violation of personal safety, as well as any possible exploitation or reduction of the person to a state of subjection.

In addition, the Company strongly condemns any illegal conduct aimed at encouraging the illegal admittance of a foreign person into Italy or any other Country of which the person is not a citizen or a permanent resident, for the purposes of making a profit on this, even indirectly.

The Company also attaches primary importance to the protection of minors and the suppression of any behaviours of exploitation towards individuals.

For this purpose, any improper use of computer tools and, in particular, the use of these tools to put in place or even to encourage any conducts relating to child pornography, even in case of virtual images, is therefore forbidden by the Company.

Furthermore, in order to ensure full respect for the individual, the Company is committed to respecting and ensuring respect by its employees, suppliers and partners for the labour protection legislation, with particular attention to child labour.

Any employee who, during their working activity, becomes aware of any act or behaviour that might prejudice personal safety as specified above, and causes the exploitation or subjugation of a person shall, without prejudice to legal obligations, immediately notify their superiors and the Supervisory Board.

In addition, for the purposes of encouraging the respect for the values of fairness and objectivity, the Company undertakes:

- to avoid any form of discrimination, in particular with respect to race, nationality, sex, age, physical disabilities, sexual orientation, political or trade union opinions, philosophical thoughts or religious beliefs;
- not to tolerate sexual harassment and psychological or physical bullying of any kind whatsoever;
- to listen to the demands of colleagues, customers and suppliers without any preconceived preconceptions or behaviour intended only to defend the Company's position and actions;
- to avoid, in the performance of its duties, making decisions or carry out activities which are contrary to or in conflict with the Company's interests or not compatible with the fulfilment of its obligations;
- to show sensitivity to and respect for others, and refrain from any conduct that may be deemed offensive;
- to condemn any behaviour intended to promote pornography, including child pornography;
- to condemn any behaviour intended to promote illegal immigration, illicit traffic in drugs and psychotropic substances and tobacco smuggling.

Article 8: TRANSPARENCY AND CONFIDENTIALITY;

In order to guarantee compliance with the principles of transparency and confidentiality the Company undertakes to:

- divulge truthful, complete, transparent and understandable information in order to allow recipients to

make informed decisions, concerning the relations to be maintained with the Company and in any situation in which the Company is involved;

- update, disclose and enforce the "Policy" issued by the Company in relation to the management, processing and communication to third parties of confidential information, with which the recipients must comply;
- protect the confidentiality of data and information available to Company employees and/or collaborators, particularly if such data and information may influence, if disclosed, the price of not quoted financial instruments admitted to trading on regulated markets. The members of the management and control bodies, employees and collaborators are forbidden to perform trading operations or any other operation, even through third parties, and to encourage the performance of these transactions, using information known by virtue of the activity carried out;
- regard confidentiality as the basis of the corporate activity, which is fundamental to the Company's reputation and its customers' confidence. The employees and/or collaborators of the Company are required to strictly adhere to this principle, even following the termination of the employment or collaboration contract. It is therefore expressly forbidden to communicate, disclose or make improper use of data, information or confidential information regarding customers or third parties in general, with whom the Company has or is about to entertain business relations. Personal data may only be disclosed to those who have a real need to know it in order to carry out their specific functions. Every person dealing with the Company shall avoid undue disclosure or circulation of said data and/or information.

Therefore, it is forbidden to:

- in financial statements, reports or other corporate communications required by law to the shareholders or to the public, expose facts that are untrue and subject to evaluation or omit information the disclosure of which is required by law on the economic, equity, or financial position of the Company (even if the information concerns assets held or managed by the Company on behalf of third parties), in a manner to mislead the recipients concerning the aforesaid situation, possibly causing a loss to shareholders or creditors, with the intention of deceiving members or the public, and in order to obtain an unfair profit for themselves or others;
- in reports or other corporate communication, with the awareness of untruthfulness and the intent to deceive the recipients of the communication, to make false declarations or conceal information concerning the economic, equity or financial position of the Company or the Group, in a manner to mislead the recipients of communication on the above situation, in order to obtain an unfair profit for themselves or others;
- conceal documents or otherwise prevent or hinder the development of supervisory or auditing activities legally attributed to shareholders and/or other corporate bodies;
- distribute profits or advanced payments of profits which have not yet been earned or which are required by law to be set aside as reserves, or the release of reserves which, even if not constituted by earnings, may not be distributed by law;
- except when permitted by law, purchase or subscribe shares or corporate investments, causing damage to the endowment fund or reserves which are not legally distributable;

- reduce the share capital thus causing damage to creditors, in violation of the provisions of law for the protection of creditors;
- either totally or in part, form or misleadingly increase the Company capital;
- cause damage to creditors by dividing assets among shareholders prior to paying creditors or allocating the amounts due thereto;
- with simulated or fraudulent acts, determine the majority in the meetings, in order to procure an unfair profit for themselves or others;
- disseminate false information, or put in place simulated operations or other mechanisms which may cause a significant alteration in the price of financial instruments.

Recipients who become aware of any omissions, falsifications or negligence in accounting or in the documents on which accounting is based are required to report these facts to the Supervisory Board.

Article 9: FINANCIAL PROVISIONS

The provisions relating to accounting require the company to keep accounting books and records which, in reasonable detail, accurately and fairly reflect the transactions and use of assets.

This requirement extends not only to general ledgers, but also to all documents that describe business transactions and dispositions of assets such as invoices, receipts, expense reports, purchase orders, and shipping documents. Incomplete, false or misleading items in company accounting books are forbidden.

The management of funds or accounts not registered or not made public are also forbidden.

Since the provisions relating to accounting records do not include the requirement of materiality, any false information concerning any amounts may be a violation of law in addition to this Code of Ethics.

Therefore, employees must be liable for compliance with the requirements concerning accounting book requirements. No employee should assume that the responsibility for the accuracy of accounting books is the sole responsibility of accounting department employees.

The internal control system ensures that: (1) transactions shall be carried out in accordance with the specific or general authorisations of management; (2) transactions shall be recorded in the manner necessary to: (a) enable the preparation of financial statements in accordance with generally accepted accounting policies or any other criteria applicable to such statements; and (b) manage the responsibility of the assets; (3) access to assets is permitted only in accordance with specific or general authorisation by management; (4) responsibility for individual assets is compared to existing assets at reasonable intervals and appropriate action is taken in case of differences.

It is good practice to record all transactions in a timely, coherent and accurate manner with respect to the

amount, accounting period, purpose and accounting classification.

In addition, the company complies with the following standards:

- Any transaction or provision of assets carried out must have the appropriate authorisation. All travel, gift or entertainment receipts provided to government officials must be retained. Applications for refund for such expenses must be accompanied by supporting documentation including: (a) a description of the expenditure; (b) its purpose; (c) identification data of who has received the amount; (d) the amount of money used; (e) the payment method. These reports must be periodically checked.
- Secret or unregistered funds or assets should not be created or managed, and account balances which are partially or totally false, not reasonably founded and lacking valid supporting documentation must not be created or managed.
- No checks shall be made payable to the "bearer" or independent representatives of a party entitled to payment. Unlike documented transaction amounts, no cash transactions shall be made unless said transaction is demonstrated by a receipt signed by the recipient, and the recipient is a party with which the Company has a written contract.
- All amounts contained must be managed with strict controls to ensure that no money is released without the necessary approvals. Approvals must be subject to the demonstration by the receiver that the money was spent exclusively for appropriate purposes. The use of cash should be limited as much as possible and all cash uses must be documented appropriately with receipts from the Company's employees who have received and paid the money. Documentation supporting the transactions of contained amounts must include: (a) the commercial purpose and date of cash use; (b) the amount paid; (c) the name of the person who has paid the money; (d) the name of the person who received the money from the company account and the name of the last recipient of the cash.
- Payments to the Intermediaries shall be made exclusively in the country in which the Intermediary provides the services or, if otherwise, in the country in which the Intermediary is headquartered. The practice of transferring funds to accounts in countries other than the Intermediary headquarters or the place where the services are provided is not permitted unless the Intermediary provides valid reasons and the correct supporting documentation and the transaction is authorised Marmon's compliance officer.
- Unauthorised persons cannot gain access to accounting systems or financial records. The removal or transfer of accounting records must be made exclusively in accordance with the company's internal policy and Marmon's policy.

Article 10: LIABILITY

In order to guarantee the respect for the value of responsibility, the Company shall act as follows:

- drawing on the principles of sound and prudent management, in order to be a solid, reliable and transparent Company, open to innovations, capable of meeting the ever-changing needs of customers, attentive to the needs of shareholders and members, interested in better developing and using human resources, as well as in a more efficient business organisation;

- pursuing business interests in compliance with applicable laws and regulations and acting in a correct and fair manner, recognising competition as a positive stimulus to the continuous improvement of the quality of products and services offered to customers, basing its business relations on the principles of loyalty and fairness;
- protecting the reputation and corporate assets;
- ensuring the compatibility between economic and environmental needs, not only in compliance with the current regulations, but also taking into account the most significant experiences in this field;
- encouraging the social and economic development of the territories where the Company is present, also by means of cultural, sporting and support projects for disadvantaged groups

Article 11: MANAGEMENT OF RELATIONSHIPS IN RELATION TO UNINTENTIONAL CRIMES CONCERNING OCCUPATIONAL SAFETY;

The Company shall clearly explain and disclose, by means of a formal document, the fundamental principles and criteria on the basis of which decisions are made, of any kind and at all levels concerning occupational health and safety.

These principles and criteria can be identified as follows:

- avoiding risks;
- assessing risks which cannot be avoided;
- fighting risks at the source;
- adapting the work to the individual, especially as regards the conception of workplaces, the choice of work equipment and methods of work and production, in order to reduce monotonous work and the effects of the work on health;
- take the level of technological evolution into account;
- replace what is dangerous with what is safe or less dangerous;
- schedule prevention, aiming at a coherent system that integrates technology, work organisation, working conditions, social relationships and the influence of the work environment factors;
- giving priority to collective protective measures with respect to individual protective measures;
- giving appropriate instructions to workers.

These principles are used by the Company to take the necessary measures to protect the health and safety of workers, including prevention of occupational, information and training risks, as well as the provision of the necessary organisation and means necessary.

The Company, both at management and operative levels, shall comply with these principles, in particular when decisions or choices are made and, subsequently, when these are implemented.

Article 12: MANAGEMENT OF CORPORATE ACTIVITIES CONCERNING ENVIRONMENTAL OFFENCES.

The Company undertakes to protect the environment, its objective being the continuous improvement of their environmental performance.

For this purpose, the commitments include:

- Compliance with national and Community environmental legislation;
- prevention of pollution;
- awareness of members, employees and collaborators on environmental issues;
- an approach to design activity aimed at minimising environmental impacts that could be the result of the design choices made.

consequently, the recipients of this Code of Ethics are obliged to maintain the following conduct:

- other than in the permitted circumstances, not to kill, capture or hold specimens belonging to a protected wild animal species;
 - other than in the permitted circumstances, take or hold specimens belonging to a protected wild animal species;
 - outside the cases permitted by law, do not destroy a habitat within a protected site or otherwise damage it so as to compromise its state of conservation;
 - do not discharge industrial waste water without authorisation, or after authorisation has been suspended or revoked;
 - do not carry out collection, transport, recovery, disposal, trading and brokering activities in the absence of the prescribed authorisation;
 - do not cause soil, subsoil, surface water or groundwater pollution by exceeding risk threshold concentrations and, if necessary, perform reclamation;
 - In the preparation of a waste analysis certificate, provide the correct information on the nature, composition and physical and chemical characteristics of the waste;
 - do not illicitly deal in waste;
 - do not exceed the air emission limit values specified by applicable authorisations, prescriptions and regulations;
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- do not import, export, transport, hold, use for profit, purchase, sell, display or hold for sale or for commercial purposes specified in EC Regulation no. 338/97 in the absence or inadequacy of the prescribed certifications or licences; do not offer for sale or otherwise transfer the aforementioned specimens without the prescribed documentation;
 - do not keep live mammal and wildlife reptile specimens, and live mammal and reptile specimens from captive reproductions which pose a health and public safety hazard.

SECTION IV - RULES OF CONDUCT

Article 13: RELATIONSHIPS WITH STAFF

The Company, recognising the staff as a fundamental and inalienable factor for business development, believes it is important to establish and maintain relationships with the employees and partners based on mutual trust.

The Company, therefore, is committed to developing the skills and capabilities of the staff in carrying out their responsibilities, so that the skills and aspirations of individuals can be fully met while achieving corporate objectives.

These goals should guide the activities of all Company divisions and, in particular, the human resource department.

The Company is committed to providing equal employment and career growth opportunities to employees on the basis of their skills and qualifications, without any discrimination, as well as any form of nepotism or favouritism.

In particular, at the time of recruitment, candidates shall be assessed on the basis of their correspondence to the profiles required by the Company. Staff is hired solely under legal employment contracts, since no form of illegal labour is permitted. The candidate shall be made aware of all the main aspects of the employment contract.

When establishing the employment relationship, the staff receives clear and specific information on regulatory and wage aspects. In addition, for the entire duration of the employment contract, employees or collaborators receive instructions which enable them to understand the nature of their job and allow them to perform it appropriately, in compliance with their qualifications.

It is the Company's responsibility to oversee the training of the employees, and encourage their participation in refresher courses and training programs in order to ensure that the skills and legitimate ambitions of individuals are fulfilled along with the achievement of corporate objectives.

It follows that:

- the Company, through the relevant functions, selects, hires, remunerates and manages staff based on merit and competence criteria;
- the corporate assessment system is managed in a transparent and objective manner.

The Company undertakes to respect and requires that its suppliers comply with the regulations concerning labour, with particular attention to child labour and women's work.

Article 14: STAFF OBLIGATIONS

The professionalism and commitment of the personnel represent a specific obligation, as they are essential prerequisites for the achievement of the Company's objectives. Employees and partners cannot be exempted from compliance with the provisions of this Code of Ethics.

In particular, they undertake to work with the utmost diligence and loyalty, in accordance with the following rules of conduct:

- avoid any situation or personal activity that could lead to conflicts of interest, even potential, with the Company or that could interfere with the ability to make impartial decisions in the best interests of the Company;
- it is forbidden to accept, whether directly or indirectly, money, gifts, goods, services, benefits or favours from any third party with which the Company has an existing relationship, in order to influence their decisions and obtain a more favourable treatment or undue services, or for any other purpose;
- any request or offer of money, gifts, favours of any kind that Staff may receive, as provided for in the

previous paragraph, shall be promptly brought to the attention of their superiors and the Supervisory Board;

- any information acquired while performing the assigned tasks shall remain strictly confidential and shall be appropriately protected in accordance with the provisions of Italian Legislative Decree no. 196 dated 30 June 2003, and shall not be used, communicated or disclosed to third parties;
- staff shall develop their own skills and expertise, enriching them with the experience and collaboration of colleagues, hence creating a climate in which all colleagues feel welcomed and encouraged to achieve their professional goals;
- the activities of every employee and partner of the operating, management or sales network, shall be based on the maximum collaboration in order to achieve customer satisfaction;
- decisions taken shall must be based on principles of reasonable and efficient management, through the careful assessment of the potential risks, with the awareness that any choice contributes to achieving positive business results;
- each individual is required to work diligently to protect the company assets, properly using the resources assigned and avoiding improper use which may damage or reduce efficiency, or otherwise be contrary to the Company's interests;
- to cooperate with the judicial authority during investigations and any other auditing process it may conduct and the following is specifically prohibited:
 - to exert any pressure on any person making statements to the judicial authority in order to induce him/her to make no statements or to make false statements;
 - to assist anybody who has committed a serious crime to help them elude any investigations by the authorities or to withdraw themselves from the research.

Article 15: CONFLICT OF INTEREST

Inventions and ideas created by employees during their employment with the Company are the property of the Company. Even company information and techniques relating to the Company and its associated Companies are also the property of the Company and must be kept confidential by the employees. An employee cannot be involved in any conflict of interest and must disclose any activity, interest, or circumstance that might be a conflict of interest.

Employees may not be involved in any conflict of interest situation as defined below without the written consent of the Company's Board of Directors and legal advisors. Any activity or interest that is potentially or possibly a conflict must be considered a conflict.

A conflict of interest is:

- Any involvement in any external, business, company or employment which can realistically conflict with the duties or responsibilities of the employee or is incompatible with the Company's best interest.
This includes in particular any involvement of the employee, remunerated or not, with any competitor, customer or supplier, current or potential, of the Company or its associates.
- A circumstance in which a relative (defined as a person with blood or similar ties, including

marriage) or a person with whom the employee has a personal relationship is either involved or becomes involved in a company or activity, including employment, which may conflict with the employee's duties or responsibilities or influence the employee's judgment in making a decision that could affect the Company or its associates.

- A circumstance in which related employees are allowed to have positions in which a relative can influence the performance or performance evaluation of the other, for example supervise a relative in the same department, gain access to confidential material that can benefit the relative, be assigned positions that may endanger the correctness of the internal control procedures or, in the case of a chairman/GM, employ a relative in any position within the Company.
- Any personal activity that would interfere with the proper performance of the duties of an employee or affect the ability of the employee to perform his or her duties, or resulting in a loyalty conflict involving illegal activities.

Any idea, invention, discovery, development, improvement, process, machinery, production, material composition, method of production, method of carrying out business activities, products, software and other works subject to copyright, trademarks, service, commercial secrets and any other information relating to the Company's activities ("Inventions") conceived, developed or put into practice by an employee, alone or in association with others, in part or in its entirety, employment with the Company or using any of the Company's assets, are and shall remain the sole and exclusive property of the Company.

Business and technical information that is not generally available and is owned, developed, licensed or owned by the Company or its affiliates must be kept confidential. Every employee must keep said information confidential during their employment with the company and following termination of the employment.

Any claim regarding an employee's confidentiality obligations or what is meant under "confidential information and commercial secret" as defined in the Code of Ethics, in the Policy and in the Agreement, must be addressed to the Chairman/GM of the Company or Marmon Group LLC lawyer or legal department responsible for the Company.

Article 16: RELATIONSHIPS WITH POLITICAL AND TRADE UNION ORGANISATIONS

The relationships established by the competent business functions with political organisations and trade unions shall be based on the principles of transparency, independence and integrity. These relationships contribute to a proper communication and should avoid any discrimination or unfair treatment, in order to foster a climate of mutual trust and dialogue in the search for solid high flexibility solutions.

Relations with political and trade-union organisation representatives fall within the responsibilities of the Group's authorised departments.

The personal participation of the Recipients of this Code of Ethics to political organisations takes place outside regular working hours and without any connection to their role within the Company.

The Company does not support any event or activity of a purely political purpose; nor can it directly or indirectly distribute contributions in cash to political parties, movements, committees and political or trade-union organisations, in compliance with applicable laws.

Article 17: CONDUCT OF THE CORPORATE BODIES

The Corporate Bodies, aware of their responsibility, are required to comply with the law, current regulations and articles of association, as well as to comply with the requirements and principles of this Code of Ethics. In particular, their members are required to:

- to behave independently, fairly with regard to the public institutions, private individuals, business organisations, political parties, as well as any national or international individuals;
- to behave with integrity, loyalty and sense of responsibility;
- ensure continuous and informed participation in the meetings and activities of the Corporate Bodies;
- assess the situations of conflict of interest or incompatibility of functions, responsibilities or positions inside and outside the Company, while abstaining from taking part in situations of conflict of interest;
- ensure the confidentiality of information of which they are aware in relation to their duties, avoiding the use of their position to obtain personal benefits, whether direct or indirect;
- to comply with the requests for information by the Board of Auditors in relation to the application of specific regulations;
- to submit at the Meeting, in relation to a specific agenda, only true, complete and unaltered papers and documents;
- not to acquire or subscribe to shares or other reserves which are not legally distributable;
- not to execute any reduction of the share capital and/or mergers with other companies or divisions, which could damage creditors.

Article 18: RELATIONSHIPS WITH CUSTOMERS AND SUPPLIERS

The Company shows a constant sensitivity and attention to the quality of the relationship with customers and its continuous improvement, as this is a prerequisite of the process of value creation and distribution in the company. In fact, customers are an integral part of the Corporate assets.

In relationships with customers, the recipients of this Code represent the Company, of which they are an integral part. To this end, the Recipients are required to carry out their activities towards Customers with professionalism, competence, availability, accuracy, courtesy and transparency. The excellence of the products and services offered and the guarantee of an immediate and qualified response to any request, are the distinctive elements of the Company's relationship with its customers.

The behaviours undertaken are based on professional respect of the confidentiality of information acquired during business, as well as the current legislation on the protection of personal data.

In the business relationships, all those who work with and for Angelo Po Grandi Cucine S.p.a. are required:

- to promote in every sector of business, including commercial relations, fair and correct conduct, condemning any possible form of disturbance to the industry or commerce freedom and any possible form of illicit competition, fraud, counterfeiting or forbearance of industrial property rights, recalling all those who operate in the interest of the Company to respect existing

- legislation, to protect the instruments or marks of authentication, certification or recognition, as well as the industry, commerce and copyright;
- to counteract and reject any conduct aimed at obtaining confidential information relating to its competitors on the market in compliance with the existing antitrust and fair competition rules by committing themselves not to take any action that might constitute a breach of such legislation;
 - to protect their own intellectual property rights and others, including copyrights, patents, trademarks and recognition marks, subject to the policies and procedures for their protection.

In order to protect the image and reputation of the Company - built through the commitment, dedication and professionalism of its structures - it is indispensable that the relations with customers are characterised by:

- full transparency and correctness;
- maintenance of high quality standards of their products and maximisation of customer satisfaction;
- accurate identification of the customers' risk profiles;
- timely response to complaints, aiming at a substantive dispute settlement;
- provision of the care and attention for every Customer or category of Customers, without any discrimination based on their nationality, religion or gender;
- development of a price policy in line with the quality of the product offered;
- commitment to make their centres and services accessible to people with disabilities, eliminating any architectural barriers,
- compliance with the law, with particular reference to anti-money laundering provisions, as well as the fight against the confiscation and use of money, property or utilities of illicit origin;
- independence from any improper conditioning, both inside and outside;
- regular monitoring of the achievement of customer satisfaction and loyalty objectives.

In addition, when starting business relationships with new customers and managing existing ones, it is necessary, taking into account available information, to avoid:

- having direct or indirect relationships with people who are known or suspected of involvement in illicit activities, in particular relating to arms and drug trafficking, money laundering and terrorism, and, in any case, with people lacking the necessary requirements of seriousness and commercial reliability;
- financing activities aimed at the production or marketing of highly polluting or dangerous products for the environment and health;
- maintaining financial relationships with those economic activities that indirectly hinder human development and contribute to violating the fundamental rights of the person (for example by exploiting the employment of child labour).

With regard to customer relations, it is forbidden for the Recipients to promise or offer the same customers benefits or other usefulness to promote or favour the Company's interests when assuming commitments and/or managing relationships of any kind.

In particular, the following is prohibited:

- to offer to the above mentioned subjects, even on occasions of festivities, any gift, except for gifts of nominal value directly attributable to normal business relations and, however, that cannot give rise, in the other party or any foreign and impartial third party, to the impression that they are designed to acquire from the Company or grant the Company an unfair advantage, or which results in the impression of illegality or immorality;
- to consider or instrumentally offer employment opportunities and/or any other kind of business opportunities that may unduly benefit them, other than the ordinary customer care;
- to make unjustified or non-contractual expenses, for purposes other than mere promotion of the Company image.

In general, employees, agents, and intermediaries of the company do not have to pay or offer assets of value to customers or potential customers or their employees to obtain orders for the Company, to influence its actions or to incorrectly gain other advantages. Company employees and Intermediaries are forbidden to be directly or indirectly involved in commercial corruption. In addition, they should not receive such payments from any person or business in exchange for incorrect benefits, such as the award of orders to such persons or companies.

Principles applied to customer relationships should characterise the Company's business relationships with its suppliers, with which it undertakes to develop fairness and transparency. In particular, it is important to ensure:

- standard methods of selection and management of suppliers, while ensuring equal respect and opportunities. While selecting the Suppliers, it is required to take into account objective and transparent assessments of their professionalism and business structure, as well as the quality, price, terms and conditions for the provision of services and delivery. In addition, it is necessary to evaluate their market value, their ability to meet the obligations of confidentiality, as required by the nature of the service, and the criteria of social responsibility and their compatibility and suitability to the size and needs of the Company;
- systems and criteria for the continuous monitoring of the quality of services and goods/services provided;
- fair supply contracts, especially with reference to the terms of payment and the administrative processes.

Adherence to the principles set out above is guaranteed by the adoption and compliance with internal procedures in terms of purchasing and supplier selection.

The suppliers are required to carry out their activities according to standards of conduct consistent with those specified in this Code. In particular, they shall ensure the utmost reliability of their activities, respecting the rights of their workers, investing in quality and responsibly managing the environmental and social impacts.

With reference to Suppliers, it is strictly forbidden for anyone who has any business relationship with them to request gifts (not only in the form of money, but also assets), benefits or other advantages, in order to facilitate their employment position with the Company, to the detriment of others and to the harm of the Company itself.

Article 19: RELATIONS WITH THE PUBLIC ADMINISTRATION

The Company identifies and defines the channels of communication with the Public Administration (including but not limited to, Ministries, Italian y the Authority for the protection of personal data, Italian Revenue Agency, etc.) at a local, national and international level.

In particular, the acceptance of commitments with regard to the Public Administration (hereafter referred to as PA) is the responsibility of the duly appointed and authorised corporate departments which are required to discharge their duties with integrity, fairness and independence. Business relations are also based on maximum cooperation, having in any case not to hinder the institutional activities, and are carried out by preserving mutual independence and avoiding any action or conduct that could be interpreted as an attempt to improperly influence decisions.

With reference to relations with the PA, Recipients are prohibited to promise or offer Public Officials or the Public Administration Employees, any gift (whether in the form of money or assets), benefits or other advantages to promote or favour the interests of the Company at the time of assumption of the obligations and/or management of any kind of relations with the Public Administration. In particular, the following is prohibited:

- to offer the aforementioned individuals, even on holiday occasions, gifts with the exception of gifts of symbolic value directly attributable to normal commercial courtesy and in any case not to be able to be created in the other party or in a third party impartial, the impression that they are intended to acquire from the Company or to give the Company undue advantages, or to generate any impression of illegality or immorality;
- to consider or instrumentally offer employment opportunities in the Public Administration to the employees (or their relatives and the like) and/or any other kind of business opportunities that may unduly benefit them, other than the ordinary customer care;
- to make unjustified or non-contractual expenses, for purposes other than mere promotion of the Company image;
- to provide or promise to provide, solicit or obtain confidential information and/or any document which could compromise the integrity or reputation of one or both parties;
- in the purchasing process, to favour the suppliers and sub-contractors suggested by the employees of the Public Administration as a condition for carrying out the activities required;
- to knowingly submit false documents or documents containing false or altered data, omit any document or information so that the Recipients or their customers could benefit from the decisions of the Public Administration;
- to have a deceptive behaviour which might lead the Public Administration into error in its technical and economic evaluation of products and services offered/provided, or unduly influence the decision of the Public Administration;
- to use or make false statements or submit false documents or prove things that are untrue or omit information, in order to achieve improperly grants, loans or other funds of the same type by the State, the European Communities or other public bodies.

Recipients are required to ensure that the public funds, contributions or loans provided to the Company, are used for the performance or implementation of activities or realisation of the initiatives for which they were granted; any use other than the one specified herein is expressly prohibited.

Anyone who receives explicit or implicit requests or offers of benefits of any kind from Public Officials or Employees of the Public Service shall immediately:

- terminate all relations with them;
- report the incident to their superiors and inform in the Supervisory Board writing.

Article 20: RELATIONS WITH MASS MEDIA

The Company acknowledges the crucial information role played by mass media to the public. For this purpose, the Company agrees to fully cooperate with the media, without discrimination, respecting each other's roles. Communications from the Company to any media shall be truthful, clear, transparent, unambiguous or non instrumental; they shall also be consistent, cohesive and accurate, and comply with the corporate policies and programs.

Relations with the press and other media shall be maintained by the duly authorised corporate departments and bodies.

In order to ensure unique information and support those who come into contact with the media, the statements made on behalf of the Company shall be subject to the prior approval of the competent corporate bodies and departments.

Promotion of the Company's image shall be done in accordance with the ethical values referred to in this Code, rejecting the use of coarse or offensive messages. The Company undertakes to properly manage the information published on the website, in order to create a complete and effective instrument, in line with market expectations.

Article 21: RELATIONSHIPS WITH COMPETITORS

It is essential that the market is based on fair competition. Therefore, the Company and its employees are committed to completely complying with the laws concerning competition and markets applicable in any jurisdiction.

No employee shall be involved in activities or establish a relationship with competitors (e.g. agreements on prices) that may appear as a violation of laws concerning laws concerning the protection of competition and markets.

The prices that the Company must apply must be determined by the same and only by it. There will be no agreement or understanding - implicit or explicit, formal or informal, written or oral - with the competitor regarding prices or pricing policies; the offers (including the decision to offer, not to offer or to decide on an offer price); discounts or promotions; deals with customers or plans to do so in the future; division of customers, markets or territories where the Company plans to sell the products; what product lines the Company intends to sell in the future; costs or volume of production; or the terms or conditions regarding the sales of the Company or any other business. No employee can contact a competitor to verify the affirmation

of a customer that a competitor has sent an offer. To avoid the appearance of improper conduct, it is absolutely forbidden to consult or discuss with any competitor in any way with reference to these areas. Similarly, agreements with a supplier or customer for the division of specific customers or territories or to boycott any individual or business are prohibited.

Unless specifically approved by the Company's General Consultant's Office, bundling (conditioning the sale of a product to the purchase of another) is prohibited and its reciprocity practice (which requires suppliers to purchase the products or services of the company as a condition for the purchase of the services and products of the supplier by the company). Resale price maintenance agreements (deals with customers, including traders, on the price at which they will sell a given commodity) are prohibited unless they are approved by the General Advisory Office. In addition, laws prohibiting price differences, promotional concessions, and services offered to customers are complex. Price discrimination, as well as other discrimination, between buyers of merchandise for resale is forbidden unless specifically approved by the Company's General Advisory Office.

Article 22: MANAGEMENT OF DOCUMENTS AND IT SYSTEMS

It is forbidden to falsify, the form and content of public or private computer documents. It is also forbidden to use any form of falsified computer documents, like the suppression, destruction, or concealment of genuine documents.

It is forbidden to abusively access a computer or electronic system protected by security measures or to remain on the same against the express or silent desire of the system owner.

It is forbidden to retrieve, reproduce, disseminate, deliver or communicate codes, keywords or other means capable of accessing a secure computer or electronic system, or even providing instructions or instructions appropriate to the purpose.

It is forbidden to procure, produce, disseminate, deliver or, in any case, make available to the company or third parties any equipment, devices or programs capable of harming a computer or electronic system of others, information contained therein or alter its operation in any way.

It is forbidden to intercept, prevent, or interrupt communications relating to one or more electronic or computer systems. Any form of disclosure, even partial, to third parties of the content of intercepted information is also prohibited. In addition the installation of equipment designed to prevent, intercept or interrupt the aforementioned communications is prohibited.

The destruction, deterioration, deletion, alteration or abolition of computer or electronic systems and information, data or programs contained therein, privately owned or used by the State, other public entity or pertaining thereto or however of public utility is prohibited.

Article 23: PROTECTION OF TRADEMARKS AND PATENTS AND COPYRIGHT

It is forbidden to counterfeit or alter trademarks or distinguishing marks, whether national or foreign, of industrial products, that is to alter, make use of such trademarks or counterfeit or altered marks.

The alteration of national, or foreign patents, designs or industrial designs, or use of said counterfeit or altered patents, designs or models is prohibited.

It is forbidden to introduce industrial products with trademarks or other national or foreign distinguishing marks, counterfeited or altered in the Country in order to obtain profit.

The unlawful duplication of computer programs for the purposes of importing, distributing, selling, holding for commercial or business purposes programs contained in media not marked by SIAE (Italian Royalties Collection Society) is prohibited.

It is prohibited to reproduce, transfer onto another media, distribute, communicate, introduce or demonstrate in public the contents of a database without the authorisation of the author, that is to extract or reuse the database.

The recipients of this Code of Ethics are prohibited from:

- using corporate secrets;
- adopting measures designed to impede the normal operation of economic and business activities of companies competing with the company;
- putting in place fraudulent acts capable of producing misuse of other customers' and damages to companies competing with the company;
- reproduce abusively, imitate, tamper with trademarks, distinguishing marks, patents, industrial designs or models owned by third parties;
- use, in the industrial and/or commercial field, trademarks, distinguishing marks, patents, industrial designs or counterfeit designs from third parties;
- to introduce into the territory of the Country for the purpose of trade, to have to sell or put any industrial products in circulation in any way by means of trademarks or distinguishing marks which are counterfeit or altered by third parties.

Article 24: ANTI-MONEY LAUNDERING, SELF-LAUNDERING AND THE FIGHT AGAINST TERRORISM

The recipients of this Code must not, in any way and under any circumstances, receive payments or accept promises thereof, or risk being involved in money laundering or deriving from illicit or criminal activities or engage in self-laundering, that is, transferring or using in economic or financial activities any sums of unlawful origin by the same person who has obtained such money illegally.

In relation to all commercial transactions undertaken on behalf of the Company, the Recipients must ensure that partners, customers, suppliers or third parties provide adequate integrity and reliability guarantees.

The Company undertakes to comply with all national and international standards and provisions on anti-money laundering and self-laundering.

The company strictly complies with all commercial sanctions and embargoes provided by national and US laws, United Nations resolutions, foreign laws and regulations. Compliance requires careful checks, and sometimes prohibitions, of transactions involving certain countries, regimes, people, entities, ships and aircraft (for example terrorists, creators of weapons of mass destruction and drug traffickers).

The company complies with all US applicable anti-boycott laws. No Marmon Company and any of its employees may undertake any action that directly or indirectly supports the Israeli boycott or any other foreign boycott non-sanctioned by the United States.

The company also complies with the provisions laid down in the US ITAR (International Traffic in Arms Regulations)

ARTICLE 25: PROHIBITED OFFERS AND PAYMENTS

The company, in line with Marmon's policies, also strictly complies with the United States law known as FCPA and any other anti-corruption law. The FCPA prohibits bribes, recommendations, and favours to government officials to obtain incorrect benefits such as assigning government orders or contracts, obtaining tax benefits or reducing VAT or income taxes, obtaining a permit or licence or speeding up procedures for permits, tax incentives or goods imports, among other examples.

In particular, the company or its agents or intermediaries shall not provide, promise or offer to supply value-added assets to a government official through corruption for any of the following purposes:

- To influence the officer;
- To guarantee themselves improper benefits;
- To influence any official decision;
- To assist the Marmon Company to obtain or retain business activities or direct business activities to any other person or company.

Similarly, the Company, its employees or Intermediaries may not authorise a third party to offer or promise to supply value-added assets to a government official for one of the purposes listed above.

The prohibition of inappropriate payments does not apply only to people who work actively in government positions. For the purpose of this Code of Ethics, as foreseen by the FCPA, the following are also considered government officials:

- Any executive or state employee of any department, agency or government agency;
- Elected officials;
- Any manager or employee of public international organisations such as the United Nations or World Bank;
- Any person acting in an official capacity for or on behalf of an agency, department or state agency or international public organisation;
- Any manager or employee of a company of owned or controlled by the government;
- Political parties outside the United States and their relative employees;
- Candidates for Political positions outside the United States;
- Any member of a royal family who may not have formal authority but who may be influential in any other way, including the ownership or management of owned or controlled state companies.

It is important to note that employees of state owned or controlled entities (partially or fully owned or controlled by the state) are considered government officials according to the FCPA irrespective of location, nationality, or classification according to local law.

In any case, it is forbidden to promise, supply, or offer value-added goods to employees or agents of state-

owned companies for the purposes described above, even if those companies pursue purely commercial activities.

For the purpose of this Code of Ethics, in line with FCPA regulations, the immediate family members of government officials (for example brother, sister, mother, father, husband, wife or children) are treated as government officials to whom the company, its executives, employees or intermediaries cannot promise, offer, authorise or supply valuable goods for corruption purposes. Similarly, the prohibitions introduced by it apply to former government officials in cases where the former official still maintains a quasi-official status.

The prohibition on improper payments or gifts not only applies to payments or offers of direct payments, but also to indirect offers or payments through intermediaries. Care should be taken to ensure that the Company's Intermediaries, such as sales representatives, consultants, advisers, lobbyists, retailers, distributors, partners, customs agents, freight forwarders or other external collaborators do not authorise, promise, offer or provide valuable goods to a government official for one of the afore-described prohibited purposes.

In accordance with local laws, no political contributions can be made to obtain or maintain contracts, to make commissions to other persons or entities, or to obtain illegal benefits.

SECTION V - METHODS OF IMPLEMENTATION

Article 26: SUPERVISORY BOARD AND CODE OF ETHICS

Monitoring, implementation and enforcement of this Code of Ethics is entrusted to the Supervisory Board, which is appointed pursuant to articles. 6 and 7 of Italian Legislative Decree no. 231/01. In particular, the tasks of the SB, except as provided in the appropriate document entitled "Supervisory Board Regulations", are as follows:

- monitor the compliance with the Code of Ethics, in order to reduce the possibility of perpetration of an offence as specified in Italian Legislative Decree no. 231/01;
- monitor and coordinate the updating of the Code of Ethics, also through its proposed amendments and/or updates;
- promote and monitor activities to foster communication and divulgation of the Code of Ethics to all parties required to comply with the regulations and standards specified herein;
- suggest the ethics training plan as provided in the Organization and Management Model of Angelo Po Grandi Cucine S.p.a.;
- express its opinion on the alleged violations of the Code of Ethics of which it is aware, notifying the competent corporate bodies of any observed violations.

Article 27: DISSEMINATION AND REPORTS

The Code of Ethics and its amendments are made available to all Recipients (whether internal or external) through appropriate communication and dissemination activities, in order to ensure the acknowledgement and application of the values and principles contained therein and avoid that any individual activity would generate behaviour which is not consistent with the reputational profile pursued by the company.

The Code of Ethics is published in many languages, including English, on the website accessible to everyone.

A hard copy of the Code is delivered to each director, employee or collaborator when respectively appointed, hired or the establishment of a relationship with the Company takes place. The Code of Ethics is subject to specific awareness campaigns to customers or other stakeholders through the press or by mail or in the manner which is deemed to be the most appropriate from time to time.

Recipients of this Code are required to report any instructions received which are in conflict with the law, the employment contracts, the internal regulations and this Code of Ethics.

Failure to comply with the reporting obligation is expressly sanctioned.

In particular, any violation of the principles and provisions contained in this Code of Ethics shall promptly be reported by the Recipients, in writing, even anonymously, to the SB or the Official/Service Manager who, in turn, will report directly to the SB.

If in doubt concerning illegal behaviour, non-ethical or incorrect actions or violations of the Code of Ethics, each recipient must promptly report his/her concerns.

The Company will not tolerate any kind of retaliation, for reports even if the behaviour reported is not illegal or improper

The Supervisory Body assesses the existence and the risk of violations highlighted in relation to corporate values and current laws; it also assesses violations of the Code and the existence of criminal misconduct, always within its powers and functions under It. Legislative Decree no. 231/01.

The contact with the SB can be done by any means either by sending a letter by post, even internally, or by e-mail addressed to the e-mail address reserved for the SB.

The SB addresses are as follows:

Matteo Colombo matteo.colombo@laborproject.it tel. 031-704381 fax 031-3515331 (Chairman)

Antonio Bambino antonio.bambino@lexlecis.com tel. 02-76398404 fax 02-76006457

Alberto Cavicchioli a.cavicchioli@angelopo.com tel. 059-639411 fax 059-639404

With the necessary involvement of the SB, reports may also be addressed to one's supervisor and/or to compliance officer Daniel Hanrahan, at 312-845-5312 or at daniel.hanrahan@marmon.com. Reports can be made via the Berkshire Ethics & Compliance Hotline at 800-261-8651 (USA and Canada) or other region-specific toll-free numbers, with call charged to the recipient at 704-752-9679 or online <https://www.brk-hotline.com>.

Article 28: VIOLATIONS OF THE CODE OF ETHICS AND SANCTIONS

With reference to the identification of the possible violations of the provisions and principles of this Code of

Ethics, as well as the applicable sanctions, please refer to the provisions of the Penalty System, specially issued by the Company, which is part of the Organisation and Management Model of the Company.

The Penalty System, in brief, identifies the following:

- o the recipients;
- o the types of material breaches;
- o the criteria for the identification and imposition of sanctions;
- o the type of applicable penalties;
- o the procedure to adopt for the actual imposition of disciplinary measures.

In particular, the Penalty System, within the limits and under the conditions specified herein, is intended for:

- o Employees;
- o Members of the Corporate Bodies;
- o Shareholders;
- o Auditing Firms; Consultants (Consulting Firm, Lawyers...); Collaborators [quasi-subordinate workers agents (e.g. promoters...), trainee...]; Suppliers; any Third Parties which have established a business relation with the Company (for example Outsourcing Company, Temporary employment agencies and commissioned employees, etc.) - hereafter referred to as Third Parties.

With reference to Employees, disciplinary sanctions are applied as specified in the respective National Collective Labour Agreement applied by the Company in accordance with the procedures provided for by Italian Law no. 300/1970 the so called Workers' Statute. The disciplinary measures applied are the following:

- o written warning;
- o fine not exceeding the amount of 3 hours of work;
- o suspension from service or remuneration for a period not exceeding 3 days;
- o dismissal for substantial breach of the employee's contract obligations (justified reason);
- o dismissal for such gross negligence to lead to the immediate termination of the employment contract (just cause).
- o Removal from service with maintenance of remuneration for workers subject to criminal proceedings pursuant to It. Legislative Decree 231/2001.

With regards to the members of the SB, the Board of Directors and Auditors, the applicable disciplinary measures for them are letter of warning, reduction of emoluments or, in the most serious cases, convocation of the Meeting for the adoption of a suspension or revocation order.

With reference to Third Party Beneficiaries, by virtue of special clauses specified in their contractual relations, any failure to comply with the principles and rules contained in this Code of Ethics, implies the imposition of sanctions as a result of a warning letter, application of a penalty or termination of the contract.

With regards to shareholders, in the event of serious breaches of the obligations deriving from the law or the contract or the prescriptions and principles established in this Code of Ethics, with relevance for the purposes of Italian Legislative Decree 231/01, exclusion from the Company may be imposed against them.



Finally, with regard to the members of the SB, the Board of Directors takes appropriate action in relation to the provisions of the Disciplinary System for the respective category of the different members (employees or self-employed persons) and in accordance with the rules contained in the SB Regulation.