

Futura Robotica srl

Sede legale/operativa :

Via Mattei, 53/2 - 29010 ALSENO - PIACENZA (ITALY)

P.IVA IT 02914021205 R.E.A. PC 171376

Phone.: +39 0523.94.57.08 - Fax.: +39 0523.94.58.14

Sales office : +39 051.79.03.20 – Fax. +39 051 652.19.60

E-mail.: info@futarobotica.com

ETHICAL CODE E OF CORPORATE BEHAVIOR

INDEX

Sector "A"

- COMPANY VALUES Pag. 2
- THE "CODE OF ETHICS AND BEHAVIOR" Pag. 3
- COMPANY CODE OF ETHICS AND BEHAVIOR:
the management Page 3

Sector "B"

- NORMS OF THE "CODE OF ETHICS AND BEHAVIOR"
- Conflict of interest Pag. 4
- Gifts and gifts Pag. 4
- Anti-trust regulation Page 4
- Accuracy and transparency of accounting records Page 4
- Protection of company assets Pag. 5
- Protection of company information and intellectual property Pag. 5
- Relations with staff Pag. 5
- Relations with customers and suppliers Pag. 6
- Relations with consumers and the media Pag. 7
- Relations with the community and institutions Pag. 7

"C" sector

- VIOLATIONS OF THE "CODE OF ETHICS AND BEHAVIOR"
- Compliance with the "Code of Ethics and Conduct" Pag. 9
- Reporting violations Page 9
- Sanctions Page 9
- Disclosure of the "Code of Ethics and Behavior" Page 11

"A" SECTOR

COMPANY VALUES

The "Code of Ethics" of the Company is realized with the following values:

Impartiality

It confirms and ensures that there are no threats to impartiality in carrying out the company's business.

Competence

It ensures the commitment to choose and motivate human resources in order to ensure the highest level of competence and updating in the performance of corporate activities.

Credibility

The Company constantly strives to put particular attention to instill trust in all the parties involved in the operational credibility, in particular to Customers, suppliers, consultants, Authorities, Territorial Organizations and the community in general.

Achievement of excellence

The Company pursues the continuous improvement of the way of operating, maintaining a constant attention to detail in every phase of the work, using resources in the most efficient way, enhancing the employees in their professionalism.

Social, environmental and safety responsibility

The company conducts the activity in a precise responsibility towards the civil society, contributing to the progress of the local communities, in accordance with the primary role of the company in the territory, facilitating the recruitment of young operators, helping with safety interventions also elderly workers, especially in compliance with the rules in reference to motherhood and fatherhood.

The Company engages in a safe and responsible way to promote the reduction of the impact of the company's activity to preserve it unchanged in the long term.

Above all, the company respecting the environment intends to operate with non-polluting products, with procedures that respect the environment and with punctual interventions, suitable and functional to the external system.

The Company also ensures full and complete compliance with the legislation on health and safety at work with continuous updates, with constantly evolving programs, with reference to "Safety Project" and with the application "Uniail Work Safety Management System".

THE CODE OF ETHICS AND BEHAVIOR

The purpose of the code is to reiterate to the whole company management system, to the company personnel, the commitment to maintain ethical behavior in all circumstances, as follows:

- strictly comply with the laws in force in the national territory;
- operate with fairness and courtesy in the relationships between colleagues;
- respect the interests of every other interlocutor (customers, consumers, institutions, public authorities and the external community);
- carry out its role with professionalism and moral integrity in respect of human dignity.

The code also defines the procedures for verifying the effective observance of the operating procedures and the sanctions envisaged in the event of violation by the personnel, which does not respect the "Code of Ethics".

CODE OF ETHICS AND CORPORATE BEHAVIOR: MANAGEMENT

The rules of the Code apply, without exception, to all the Company's components, from the Employer to all the company staff, that operators in specialist collaboration and evaluators.

All components of the Company are therefore obliged to receive a copy of the "Code", to read it, to know its contents, to accept it, with a specific written declaration and to conduct a conduct in accordance with the principles contained therein.

Furthermore, the personnel is also required to report any violations of the Code, as better illustrated in the final part of this document.

"B" SECTOR

RULES OF THE CODE OF ETHICS AND BEHAVIOR

Conflict of interests

In carrying out their work, each employee is obliged to avoid any possible conflict of interests, with particular reference to personal and / or family interests that could influence the independence of their own judgment and conflict with their responsibilities.

Every employee must immediately report to his / her hierarchical superior and / or to the top of the Company any situation that constitutes or may generate a conflict of interests. In particular, the employee must communicate the existence of a permanent or temporary employment relationship, or a financial, commercial, professional or family relationship, with external entities that may influence the impartiality of their conduct or jeopardize the correctness of the activities carried out by him.

Gifts, gifts and benefits

It is not allowed to offer and receive forms of gift or benefit that can be interpreted as exceeding the normal commercial and courtesy practices, or that can be understood as a tool to acquire favorable treatment in the context of the performance of work activities.

Any kind of corruptive behavior towards public officials, officials, or employees of public administration, authorities and public institutions, in any form or manner, is not tolerated. The rules that regulate the Company's operating activity, in the national legislation, must be strictly observed and respected.

The aforementioned rules can not be circumvented by resorting to activities carried out by third parties and / or by procedures that are out of the way.

As a tribute then, we mean also those benefits that are identified, for example, as an offer to participate in seminars and / or training courses with promises of work and transfers outside the company, to encourage the use of materials and / or quant ' other.

Anti-trust regulation

The Company acts on the market in a fair manner, refraining from abuse of a dominant position or jeopardizing free competition. The company operates in a deontological respect towards fellow entrepreneurs.

Accuracy and transparency of accounting records

The company operates with maximum transparency at the administrative and accounting level, guaranteeing the truthfulness, accuracy and completeness of the information relating to each accounting entry for each individual site.

In order to prevent a distorted use of corporate funds or the registration of fictitious transactions, for each operation retained adequate documentation supporting the activity carried out, such as to allow the

carrying out of checks that verify the characteristics, the reasons for the operation and identify who authorized, performed, registered and verified the operation.

Every employee is required to scrupulously observe all the procedures in force in administrative and accounting matters.

Protection of company assets

Every employee is required to work diligently to protect company assets by using the instruments entrusted to him in a correct and responsible manner and avoiding improper use.

Every employee must operate, respecting the rule of art for care and maintenance.

With reference to the use of IT tools, each employee must scrupulously respect the provisions of the appropriate IT policy document, in order not to compromise the functionality and protection of IT systems.

In summary, it is not allowed:

- use the tools available (programs, e-mail, internet, telephone, fax, etc.) for purposes that are not related to work needs;
- download programs or install unauthorized software, or different from the one provided by the company;
- sending unsavory e-mails that could cause offense to persons and / or damage to the corporate image;
- browse on websites with indecent and offensive content;
- use company personnel for their own work extra-work activities.

Protection of information and intellectual property

Company information of any kind (commercial, financial, technological, etc ...) represents an asset that the Company intends to protect, in so far as it is a heritage of culture and continuous technological investment.

It is therefore forbidden to disclose to unauthorized persons (inside and / or outside the Company) information that may jeopardize the professional - commercial assets acquired over time.

The Company intends to apply the provisions of Legislative Decree 196/2003.

Relations with the staff

Compliance with the contract and regulations at work

The Company is committed to respecting fundamental human rights, laws and labor regulations. In particular, every employee is hired with a regular employment contract and no form of irregular work, child labor, or "illegal work" is tolerated; the company emphasizes the application of the principle of fair competition.

A written contract drawn up in compliance with the laws in force at national level is prepared for each employee.

Selection, management and development of human resources

The Company avoids any form of discrimination towards its employees / collaborators and adopts objective criteria in the selection, management and development of human resources.

In particular, the assessment of the personnel to be hired, of the consultants and evaluators by the Company, is carried out on the basis of the correspondence of the candidates' profiles, with respect to the company needs, in respect of equal opportunities for all the subjects involved.

The Company is committed to enhancing and enhancing the skills of its human resources and aims to offer all company staff development opportunities based on skills and abilities, avoiding any form of discrimination, related to age, sex, race, state of health, nationality, political opinions and religious beliefs.

Protection of moral and physical integrity

All company personnel, whose physical and moral integrity is considered the primary value of the company, are guaranteed working conditions that respect individual dignity, in safe and healthy workplaces.

In particular, the Company does not tolerate:

- abuse of power: constitutes abuse of the position of authority, requesting as due action to the hierarchical superior, personal benefits and favors, or assume attitudes and / or perform actions that are detrimental to human dignity and above all to the autonomy of the collaborator;
- acts of psychological violence: attitudes or behaviors that are discriminatory or harmful to the person and his convictions;
- sexual harassment, behavior or speech that may disturb the personal sensitivity of the operator;
- acts of bullying, which can seriously compromise the health of the worker on the job site;
- operational bullying, which can bring psychological situations with heavy consequences in the operative activity of the employee.

The Company is committed to spreading and consolidating a culture of safety, developing awareness of the risks for all its operators, inasmuch as it considers its employees as vital force and dynamic lymph of how "doing business";

The Company is committed to spreading and consolidating a culture of safety, developing awareness of the risks for all its operators, inasmuch as it considers its employees as vital force and dynamic lymph of how "doing business";

the Company deems it appropriate to proceed with the health protocol, apply the emphasis of the Italian language, create information and training for its employees, through training information planning (formerly Article 9 of Legislative Decree 626/94, resumed with Legislative Decree 81 / 08); the Company stimulates responsible behavior by all employees, adopting suitable work methods, ensuring adequate training and operating in full compliance with the legislation on safety and prevention; the Company intends to use updated, suitable and increasingly lowered technologies to help the worker, in order to eliminate unnecessary workload and / or fatigue situations.

Privacy protection

The privacy of the staff is protected respecting the rules established by law and adopting appropriate methods of processing and storage of the information that the company requires.

Investigations on personal opinions and preferences, and, in general, on the private life of company personnel are not allowed.

Relations with customers and suppliers

The reports and communications with the customers of the Company are based on the utmost correctness and compliance with the regulations in force, including all the rules regarding accreditation, without any recourse to commercially incorrect practices. Great importance is attached to the attestations of important safety principles and operational prevention.

In the purchasing processes, suppliers are selected on the basis of objective criteria, such as price and quality of service, offering each supplier equal opportunities, establishing the principle of cost / value analysis, in order to always check the suitability of evaluation and acceptance. .

Relations with consumers and the media

The Company undertakes to guarantee consumers an immediate, qualified and competent response to their needs, providing correct and truthful information on the validity of the certifications issued.

The communication of the Company towards the outside is based on respect for the direct information correct, precise and based on transparency procedures, strictly eliminating news, false or biased comments.

The Company in the delivery of the final product, attaches all the necessary documentation of suitability to the final user.

Relations with communities and institutions

Environmental policy

The Company is aware of the influence, even indirect, that its activities may have under the conditions, on economic and social development, and on the general well-being of the community through the continuous creation of work situations so that future job security can exist. family in economic tranquility and create so right ring of

continuous gestation, with respect to the law included in the Italian constitution at the level of work, respect for human dignity, entrepreneurial social responsibility.

Economic links with parties, trade unions and associations

The Company with its own "Code of Ethics" applied in a vision of careful operational morality does not finance either political parties, their representatives or candidates in Italy or abroad; does not sponsor congresses or parties that have a political propaganda purpose. The Company intends to remain absolutely free from any direct or indirect pressure to

political exponents.

The Company does not make contributions to organizations such as trade unions, environmental associations or consumer protection associations.

The Company, however, in the context of proper moral attention, can cooperate with such organizations only when the following conditions exist simultaneously:

- purpose attributable to community social respect;
- clear and documentable destination of resources in a correct code of ethics;
- express and clear affirmation of the organizations mentioned for social and community purposes.

On the other hand, the Company can accept requests for contributions limited to proposals from bodies and associations, openly without profit, without human exploitation, without speculative hidden ends, but with precise and regular statutes, constitutive deeds that must be attached to requests for contributions; in any case, the Company can also join those bodies of a humanitarian medical support nature, of a national value initiative.

Relations with institutions

Relations with the Public Administration, the State Institutions must be organized according to precise implications of laws and regulations, without altering the company's "Code of Ethics".

To this end, the Company undertakes to:

- establish transparent, stable channels of communication with institutional interlocutors at community, territorial level,
- provincial and municipal;
- represent the interests and positions of the company in a transparent and consistent manner avoiding any collusive attitude, always putting the precise code of ethics for its own activity and for safeguarding the work of its employees.

"C" SECTOR

VIOLATIONS OF THE "CODE OF ETHICS AND BEHAVIOR" AND SANCTIONS OBSERVANCE OF THE CODE OF ETHICS AND BEHAVIOR

Compliance with the rules of this Code must be considered an essential part of the contractual obligations of employees.

It must also be considered an essential part of the contractual obligations assumed by collaborators, even subordinates and / or subjects having business relations with the Company.

The Company is responsible for ensuring that its expectations of conduct towards employees are understood and implemented by them. The Company must ensure that the other commitments expressed in the Code are implemented at the level of the various functions.

VIOLATION SIGNALS

In order to ensure the effective application of the code, the Company requires all those who become aware of any cases of non-compliance with this Code to make an alert.

Employees and collaborators must report any violations or suspected violations to the direct superior or corporate functional referent, or, in cases where the report is not effective or appropriate, they must directly contact the top management.

The Supervisory Body is represented by the Owner or Holders of the Company, with a technical and / or administrative employee and with the Safety Workers Representative and the Prevention and Protection Service holder with autonomous powers of initiative and control.

The Supervisory Body ascertains the validity of the report, punctually checks the news transmitted with due attention, in the eventual application of disciplinary sanctions or for the activation of resolution mechanisms

contractual. The Supervisory Body also guarantees that nobody in the workplace can suffer retaliation, illicit conditioning, inconvenience and discrimination, for reporting the violation of the content of the Code of conduct or internal procedures.

Any form of retaliation against those who have carried out in good faith reports of possible violations of the code is also a violation of the Code. Furthermore, the violation of the Code should be considered the behavior of those who accuse other employees of the violation, with the awareness that such violation does not exist.

SANCTIONS

The violation of the principles established in the Code of Ethics and Conduct and in company procedures compromises the relationship of trust between the Company and anyone who commits the violation (directors, company staff, customers, suppliers, consultants, craft firms, specialist operators, artisans and evaluators).

Once verified, the violations will be promptly and promptly pursued through the adoption, consistent with the provisions of the current regulatory framework, of adequate and proportionate disciplinary measures, regardless of the possible criminal relevance of such behavior and the establishment of a criminal procedure

in cases where they constitute a crime.

The disciplinary measures for violations of this Code are adopted by the Company in line with the laws in force and with the relevant national labor contracts.

These measures may also include the removal from the Company of those responsible for such illegal conduct.

The Company, in order to protect its image and safeguard its own resources, will not enter into any kind of relationships with subjects that do not intend to operate in strict compliance with current legislation, and / or refuse to behave according to the values and principles set forth in the Code of Ethics and of Behavior.

The Company wants to establish precise disciplinary measures so that abnormal situations are not created at work such as to create discrepancies in a homogeneous management of behavior and procedures.

More precisely, the company introduces disciplinary measures:

- verbal reprimand;
- written reprimand (temporalized n ° three times);
- fine not higher than the amount of three hours of remuneration;
- suspension from work and pay for up to three days;

More precisely, the employer has the right to apply the fine when the employee:

- does not perform the work according to the instructions received;
- leave the workplace without justified reason;
- is absent from work without justified reason;
- introduce alcoholic beverages at the work site, without prior authorization, in cases of nature
- special (occurrences and / or anything else);
- is in a state of inebriation at the beginning and during work;
- in some way violates the provisions of this Code or commits shortcomings that affect the discipline at the work site;

The Company also announces that it may proceed with the dismissal of the employee for serious cases carried out by the employee and thus resulting:

- insubordination or offense towards superiors;
- theft, fraud, voluntary damage or other crimes for which, given their nature, the continuation, even provisional, of the employment relationship is incompatible;
- any negligent act, which could jeopardize the stability of the works even provisional, the safety of the building site or the safety of the personnel and the public, constitutes damage to the works, plants, equipment or materials;

- stealing of sketches, tools, or other objects owned by the Customer;
- unjustified abandonment of the workplace by the guardian or custodian of the warehouse or the building site in the workplace or serious offenses against the workmates;
- unjustified absence;
- recurrence in any of the shortcomings that gave rise to two suspensions in the previous year.

DISCLOSURE OF THE CODE OF ETHICS AND BEHAVIOR

This "Code" issued by the Company is brought to the attention of company personnel and any other third party that can act on behalf of the company. All the aforementioned subjects are required to learn and respect their contents.

A copy of the "Code of Business Conduct" must be present on every work site in view;

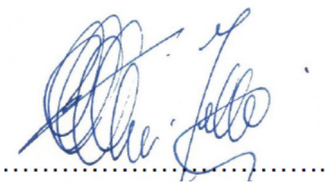
the Company gives each person the "Code" with the document "promoting safe behavior" (SUVE - Lucerna - Ch); in every company bulletin board it must be exposed on sight.

All customers, suppliers, consultants, external collaborators, artisans, artisan firms, operators in specialist collaboration, all other collaborations provided by external professionals in contact with the Company, all Institutes of any type and nature always in contact with the business operations, all the work protection and prevention bodies relevant to the activity

company, all territorial political institutions, must absolutely receive a copy of the "Code of Ethics and Business Conduct", so as to understand that the company has established a precise process of well-being, attention, safeguarding the work of its staff, to consider man at the center of moral interest and

of the company, to bring the principle of social utility also for the external community.

FOR APPROVAL

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke, positioned above a dotted line.

Legal Representative

Futura Robotica srl