



Avimatic s.r.l.'s Code of Ethics

Index

Introduction

General provision

1.	2
1.1	Field of application and recipients	
1.2	Information and communication	
1.3	Fairness	
1.4	Conflict of interests	
1.5	Confidentiality	
2.	Business conduct	3
2.1	Business relations	
2.2	Defence of the competition	
2.3	Relations with customers	
2.4	Relations with suppliers	
2.5	Relations with the institutions	
3.	Health, safety and the environment	6
3.1	Environmental protection	
3.2	Health and safety at work	
4.	Internal policies	9
4.1	Policies with regard to employment and equal opportunities	
4.2	Harassment at work	
4.3	Alcohol or drug abuse	
4.4	Control and transparency of the accounts	
5.	Supervisory body	9
5.1	Responsibilities	
6.	Disclosure	9
6.1	Regulations for implementation	
7.	Conclusion	9
7.1	Compliance and modifications	

Introduction

In carrying out its business, AVIMATIC has always been committed to respecting strong human values and solid principles.

Therefore, this document expresses the commitments and ethical responsibilities of AVIMATIC towards its customers, its suppliers and its employees and collaborators.

These commitments and responsibilities are aimed at creating satisfaction for its customers and suppliers, value of the property and professional growth for employees and collaborators, and they are the inspiration behind the company's business activities as well as at the basis of its internal and external management.

To this end, AVIMATIC pledges to act in compliance with the principles of freedom, dignity of the human person and respect for diversity, repudiating any discrimination based on sex, race, language, religious and political beliefs and on any personal and social condition.

1. General provisions

1.1 Field of application and recipients

What is included in this Code of Ethics (Code) summarizes the general obligations of fairness and loyalty that qualify the performance of work and conduct in the workplace and it is binding for the directors of AVIMATIC srl, for its employees (also in a temporary employment relationship) and for all people (collaborators and consultants) who have a work relationships with the company.

1.2 Information and communication

AVIMATIC and the recipients commit themselves to carrying out their activities in compliance with the ethical and moral principles contained in this Code.

AVIMATIC is responsible for making this Code known to all recipients, urging its observance, and commits itself to updating it with regard to the requirements that may be necessary from time to time

1.3 Fairness

Every operation and/or transaction must be legitimate, coherent, reasonable, documented, recorded and verifiable.

Employees and entities that make purchases of goods and/or services, including external consultancy, on behalf of AVIMATIC must act in full compliance with the principles that animate the company.

The management and each function/area of the company is responsible for the fairness and coherency of their conduct in the performance of their activities.

The activities of sponsorship carried out by the company must be allocated in favor of institutions and/or organizations of absolute reliability and sound ethics that are able to provide adequate guarantees regarding the correct destination of the sums paid out.

1.4 Conflict of interests

The recipients pursue, in carrying out their activities and/or duties, the objectives and general interests of AVIMATIC avoiding any activity and/or situation of personal interest that could constitute a conflict between the individual interests and those of the company.

In particular, it is forbidden to adopt conduct oriented towards the exploitation of the privileged information held by the company for personal purposes and any type of conduct in competition with the company's activity and that is in any way contrary to the purposes and to the principles that it pursues is considered in "conflict of interests" with the company.

Any kind of pressure, proposal or report that could damage AVIMATIC must be communicated to the company

1.5 Confidentiality

It is forbidden to spread false information both inside and outside the company concerning the company itself, the property, employees, collaborators, consultants and third parties working for it.

All company information must be handled through institutional channels guaranteeing its protection in full respect of professional secrecy and safeguarding.

2. Business conduct

2.1 Business relations

AVIMATIC and its employees and collaborators, in conducting business relations, pursuing the interest of the company, must be inspired by the principles of legality, correctness, transparency and efficiency both in relations with customers and suppliers and with the Public Administration.

It is forbidden either directly or through a third party to ask for or accept any kind of compensation or personal benefit related to the management of the company.

It is forbidden to receive and/or offer any object, service, performance or do a favor for/receive a favor from Public Officials and Persons in Charge of Public Service or their relatives, also through third parties, as well as customers, suppliers and other subjects, except for gifts or other utilities of low value.

Recipients who perform activities on behalf of the company must ascertain that the persons with whom they have business relationships possess the legitimate powers conferred on them and must act in

compliance with and within the limits of the powers of attorney or proxy conferred upon them.

2.2 Defence of the competition

AVIMATIC undertakes to exercise fair competition by recognizing the same right to other companies.

For this reason the company establishes its commercial policy independently and free from any agreement or collusion with competitors and establishes fair relations with its customers and suppliers in accordance with the laws regulating competition.

2.3 Relations with customers

AVIMATIC recognizes that customer satisfaction is of paramount importance for its business success.

Therefore, it is committed to providing, with efficiency and courtesy, in compliance with the contractual conditions, high quality products that meet customer expectations by providing them with accurate and correct information about their work.

The company adheres to truthful advertising or other communications.

2.4 Relations with suppliers

The selection of suppliers, of any goods and/or service, and the determination of the subsequent contractual conditions must take place on the basis of an objective evaluation of the quality and price of the goods and/or service, as well as guarantees of assistance and rapidity and in any case always in consideration of the satisfaction of its customers. AVIMATIC does not forbid any company, in possession of the required requisites, from being able to establish supply relationships with the company and commits itself to maintaining an open and frank dialogue with its suppliers in line with commercial practices.

2.5 Relations with the institutions

AVIMATIC and its employees and collaborators must maintain relations with the Public Administration (local, national, European and international Public Administration) and its representatives (Public Officials) in compliance with current legislation and on the basis of the general principles of fairness and loyalty.

The company commits itself to not creating situations of clear conflict of interest in relations with the Public Administration.

In case of access to/request for funding, grants or subsidies from the State, the European Union or other public body, the company pledges to scrupulously respect the current legislation and not to assign what has been granted to purposes other than those for which such financing, grants or subsidies have been granted.

3. Health, safety and the environment

3.1 Environmental protection

AVIMATIC, in carrying out its business activities, is inspired by the principle of environmental protection in compliance with current legislation.

Technological innovation must be particularly dedicated to the improvement of processes with a view to increasing environmental compatibility and the safety of the consumers.

3.2 Health and safety at work

AVIMATIC, considering personnel and human resources as the most important corporate assets, promotes the culture of health and safety in the workplace.

In strict compliance with the accident-prevention regulations in force, the company works to prevent accidents and occupational diseases, adopting systems for safety management focused on prevention, encouraging the spread of a strong culture of safety at work in every business setting and providing its employees and collaborators, at all levels, with adequate training, general and specific information and any support to working in conditions which are healthy and safe.

AVIMATIC ensures that risk assessments are carried out and appropriate corrective measures are taken to avoid risks to health, human safety and the company's activities.

AVIMATIC works so that the machines, processes, systems, practices and work environment are constantly improved in order to optimize their safety and accident prevention performances.

With a view to the total dissemination of the health and safety culture, AVIMATIC considers accident prevention and health of the workplace as an essential element in the selection of its suppliers.

4. Internal Policies

4.1 Policies with regard to employment and equal opportunities

AVIMATIC offers all workers the same job opportunities so that everyone can enjoy fair treatment based on criteria of merit.

The identification and selection of personnel must take place via the assessment of the specific skills, the professional profile and the technical and aptitudinal skills of the candidate, meeting the needs and requirements of the company, and all the information acquired during this phase must be strictly linked to meeting the required requisites.

The company regulates its working relationship with its employees and collaborators in full compliance with current legislation on the subject, incorporating any possible updates to it.

4.2 Harassment at work

AVIMATIC strives to ensure that no harassment takes place in the internal and external work relationships that lead to the creation of a working environment that is intimidating, hostile or isolating towards individuals or groups of workers or that hinders the individual prospects of others for mere reasons of personal competitiveness.

4.3 Alcohol or drug abuse

AVIMATIC requires its employees and collaborators to contribute to the maintenance of a work environment that respects the sensibility of others. Therefore, drinking alcohol or taking drugs or any other narcotics while working as well as distributing drugs under any circumstances at work is considered an awareness of the risk of acting in the prejudice of these environmental conditions.

4.4 Control and transparency of the accounts

AVIMATIC condemns any conduct, by anyone, aimed at altering the clarity, correctness and truthfulness of the data and information contained in the financial statements, reports or other corporate communications required by law, addressed to the business partners or to the public. Any type of corporate transaction or conduct likely to cause unjust damage to creditors or cause damage to the integrity of the company's assets is also prohibited.

The company requires that both its directors and employees and collaborators, within the scope of their specific competences, should maintain correct and transparent conduct aimed at providing truthful and correct information upon legitimate requests from business partners, corporate bodies as well as during audits and inspections by the competent Public Authorities.

5. Supervisory body

5.1 Responsibilities

The ownership of AVIMATIC, represented by its business partners, is responsible for the supervision, operation and compliance with the organizational processes and principles contained in the Code of Ethics; the ownership is also responsible for the constant updating of the same and for making sure that they are made known to employees, collaborators, customers, suppliers and, in general, to all interested third parties.

All the subjects involved in the activities of the company are required to cooperate fully in order to allow for full implementation of the provisions of this Code.

6. Disclosure

6.1 Regulations for implementation

This Code must be brought to the attention of the business partners, employees and collaborators of the company (to which a hard copy must be delivered), and of all those who can act on behalf of the company, and it is published on the AVIMATIC website so that it can also be accessible to customers and suppliers.

7. Conclusion

7.1 Compliance and modifications

Compliance with this Code must be observed by the business partners, employees and collaborators and by any person having business relations with the company.

Any modification to it must be approved by AVIMATIC.