



Farid Industrie S.p.A.

CODE OF ETHICS

1. ETHICS

Farid operates its internal and external activities in compliance with the principles set out in the Code of Ethics, which must be observed by all the Recipients, acknowledging that the success of Farid can not exclude respecting ethical considerations in the management of the business.

The key features of the Code of Ethics are based on the principles of legality, legitimacy, fairness and transparency in the management of the Company, and such principles must be observed by all the Recipients in carrying out their respective skills and work.

The Code of Ethics, which constitutes an integral and essential part of the Model, has been produced to introduce and make binding, for the Company and the individual Recipients, some rules of conduct which will prevent the perpetration of Relevant Crimes, and to reward the action and care taken by Farid in the conduct of its business, so as to not be held ultimately liable for eventual illegal actions that take place inside the Company, in breach of the rules provided by the Code of Ethics.

Therefore, the Recipients may never consider themselves authorized to act in breach of specific rules set out in the Code of Ethics; neither if such action aims to obtain an advantage nor to imply an interest of Farid. For such purposes, the Code of Ethics does not substitute, but only operates alongside, the laws adopted by the competent authorities. In the event that a Recipient acts contrary to the Code of Ethics, that person(s) shall be deemed to be solely responsible, with Farid taking no responsibility for the individuals actions.

2. LEGALITY

Farid and the Recipients run their business in full compliance with the Italian and the European Union Laws, and with the laws of all the States where they operate.

All the Recipients are required to know and observe National and European Union laws regulating their respective area of competence and the codes of ethics and conducts of their specific professional figures. Any decision taken in these areas must fully comply with the applicable laws and, in case of uncertainty about their interpretation, the Recipients are obliged to contact the Surveillance Body and to comply with its decisions.

Furthermore, the corporate bodies and all the Recipients are required to strictly comply with the Company procedures provided for by the Model and with the rules set out in the Code of Ethics.

3. OBJECTS

Customer satisfaction and excellence in the creation of returns for the shareholders and the investors are primary objects for Farid.

These targets are pursued, both during the decision making and the operating phases, through constant attention to the efficient employment and allocation of the resources, which is evident in the planning of the best industrial, commercial and financial strategies, characterized by clarity, reliability and fairness.

4. CONDUCT IN THE COURSE OF BUSINESS

In pursuing the objects set out in the previous article, and generally, in carrying out their professional activities, the Recipients are required to comply with the rules set forth in this article 4.

The Recipients must comply with both the regulations of the national and international environments where they operate and with the universal criteria of transparency, fairness and loyalty in the conduct of business.

The Recipients must strictly avoid encouraging or carrying out illegal and unfair actions against the community, public authorities, customers of Farid, employees, shareholders and competitors. They must aim to pursue their own objectives which, on the contrary, must be

represented by the maximization of performance, care of the customers, the pursuit of the quality and availability of the Company`s products.

Save as determined by the laws or by the public authorities, the Recipients must keep all confidential information they may be aware of in the exercise of their functions and relating to Farid, its customers, its suppliers and its competitors, as strictly confidential.

5. HUMAN RESOURCES POLICY

Human resources are an essential element for the success of the Company: therefore Farid improves its employees` skills and capabilities, supports their expertise and professionalism, protects the health and safety of their work place, and protects and recognizes their rights, including the right of privacy.

Farid, relies on certain key principles of human resource management for its success in the market. It selects each employee exclusively according to the Company`s requirements, and on the basis of the professional skills and personal profile of the candidates, fully respecting equal opportunities and the importance of the highest professional standards. In order to guarantee constant improvement of the employees` skills and potentials, Farid considers it fundamental, in reaching its objectives to encourage the professional development and technical skills of all the employees, at any level, to promote the development of the individual and of the entire Company.

In the management of the human resources, Farid strictly follows a policy based on the equal opportunities and treatment, avoiding any kind of discrimination and favoritism, and basing its evaluations of the employees` work and professionalism solely on the merit, giving to each employee and/or partner real, serious, concrete, reachable and measurable targets, to verify individual`s performance and to fairly recognize the contribute of the individuals, using clear and transparent criteria.

Farid supports and encourages the reciprocal respect, trust and loyalty in the relationships between the employees, and between the employees and the Company`s managers, acknowledging that a smooth and collaborative work environment is an essential condition for the profitable conduct of the business.

All the Recipients must undertake to do their works, in relation to their specific function, in the exclusive interest of Farid, avoiding any situation or position of conflict of interest which could damage professional collaboration and mutual trust. If a conflict of interest arises, each individual is required to immediately communicate it to his direct superiors, in order to deal with this circumstance in an optimal and profitable way, respecting all the interests involved.

6. PROTECTION OF SHAREHOLDERS AND INVESTORS

Farid guarantees to its shareholders to pursue the objects set out in article 3, to treat them in an equal way, avoiding any sort of favoritism or preference for any classes of shareholders or investors.

Farid protects the patrimonial integrity and safety of all its investors, taking the greatest care of the accuracy and transparency of the financial and accounting management of the Company, and through the implementation of efficient strategies for the reduction of risks.

Farid takes the greatest care to ensure that the Recipients who hold executive positions within the Company strictly avoid any kind of conflict of interest, even if potential, with Farid.

7. PROTECTION OF CUSTOMERS

Customer care and ongoing customer satisfaction are considered extremely important elements by Farid. Therefore it acts fairly and with goodwill in the drafting of contracts, always ensuring excellent standards in the supply of products and services, requiring its employees to act with a high level of professionalism and skill, and managing the relationships with the customers with great loyalty and fairness.

Farid has always based its relationships with the customers on total loyalty, *goodwill*, fairness and transparency, both during the negotiation and the execution of the contracts, avoiding any abuse of eventual dominant positions aimed at imposing imbalance and oppressive conditions, firmly believing that the success of Farid solely comes from its performance and the total satisfaction of its customers.

Therefore Farid guarantees to its customers, together with the quality and availability of its products and the experience of its employees and partners, constant assistance and helpfulness, correctness and kindness by all the Recipients in the exercise of their commercial relationships and at all levels.

Furthermore, Farid respects the right of privacy of its customers, obliging the Recipients to keep any sort of information regarding the customers and acquired in their function as employees or partners of the Company, as strictly confidential, in compliance with the regulation of this matter.

8. PROTECTION OF ENVIRONMENT

Farid is aware of the crucial importance of such values as environmental protection and sustainable development aimed at protecting future generations.

Therefore the Recipients are required to carefully weight the environmental impact of their choices and decisions and to minimize their negative effects.

Furthermore Farid, through continual investment in the research and development, constantly encourages the Recipient to find new and more advanced solutions to reduce the environmental impact of its products.

Within the negotiation and the execution of contracts and, more generally, during its whole operations, Farid pays particular attention to (i) use processes, technologies and materials

which allow the greatest reduction in the use of natural resources and waste, and which have the minimum environmental impact; (ii) minimize the wastes through the reuse and recycling as far as possible; (iii) ensures the correct storage and disposal of waste; (iv) make its employees and partners more aware of environmental protection, through clear conduct, rules and an appropriate policy of information and action.

9. RELATIONS WITH THE COMMUNITY

The Recipients are required to make the greatest efforts to integrate of Farid with the local entities where it operates.

By respecting the mutual autonomy and independence, Farid promotes the economic development, the progress and the improvement of the local entities, respecting their individual characteristics and basing its business on the consent and prestige of the Company as a whole, considered as fundamental values for its success in the market.

10. RELATIONS WITH THE PUBLIC AUTHORITIES

The Public Administration is the set of private and public entities which are responsible for a "public function" or a "public service".

For "public function" we mean, generally and approximately, all the activities regulated by public laws; while, for "public service", we mean, briefly, every activity for the production of goods and services of general interest, subject to the state control and aimed at guaranteeing the fundamental rights of the person.

The relationship between Farid and the Public Authorities and local Public Bodies, both national and international, are based on full collaboration and transparency. The Recipients are strictly prohibited, unless legally allowed, to give to the Public Authorities, the Public Bodies and the Public officers and employees any sort of contribution, benefit, inducements or gift.

In the course of business negotiations, calls of tenders and any kind of relationship with the Public Authorities and the Public Bodies, both directly conducted by Farid and conducted by its intermediaries, the Company undertakes not to influence in any unlawful or improper way the relevant decisions, and to avoid the following behaviours: (i) to propose job opportunities or personal benefits, both commercial or of any other kind, and to offer gifts or inducements; (ii) to obtain and use confidential information which may damage mutual integrity and reputation; (iii) to act in a way which may cause illegal, unlawful or preferential behaviour and damage the transparency, impartiality, loyal competition and the actions, procedures and conditions required of the public servants.

The Recipients must cooperate with the Public Authorities using the greatest loyalty and *goodwill*, and must promptly and correctly provide them with all the information ultimately required in compliance with the applicable regulation, concerning Farid`s operation, its economic, financial and accounting position, its relations with employees, partners and competitors.

Save as provided for by the laws concerning the "union deductions" (for Italian Laws purposes "*trattenute sindacali*"), Farid supports or benefits, neither directly nor indirectly through the

Recipients, any party, political organization and/or committees, union trade and their candidates or representatives.

11.COMPLIANCE WITH THE CODE OF ETHICS

All the Recipients are obliged to be aware of and observe the rules provided for by this Code of Ethics of which Farid undertakes to circulate internally and externally.

Farid asks its employees and partners, and any third person entertaining more or less occasional relations with the Company, to notify the relevant responsible person in the Company and the Surveillance Body, expressly created in compliance with the Decree, with details of any violation of the obligations set forth by the above articles ultimately carried out by the Recipients.

Compliance with the rules provided for by the Code of Ethics must be deemed as an essential part of the contractual obligations arising from the employment by or partnership relationship with the Company and of the execution and development of the foreign relations.

Furthermore, Farid encourages and supports communication to the Surveillance Body, by the subjects mentioned in the previous paragraph, of non compliance with the Code of Ethics or the Model.

12.SANCTIONS

The Recipients who act in breach of this Code of Ethics shall be subject to disciplinary action, in addition to those provided for by the criminal, civil and administrative laws applicable whenever and wherever such a breach occurs.