

ETHIC CODE

Ferfrigor Porto s.r.l.

Approved by the Administration Manager on Jan.28th 2020

FERFRIGOR PORTO SRL adopted its own model for the managing organization and control according to the law dated June 8th 2001, n. 231 and its own Ethic Code, lending our activity in the exclusive respect of those forecast in this Model and to the Ethic Code . FERFRIGOR PORTO SRL ask to third party the compliance of these documents, who invites to take note, since constantly revised, in his web site.”

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Chapter 1 – Ethic Code

1.1 Introduction

This Ethic Code list the principles, the engagements and the ethic responsibilities that found the Society' activities and the management of Ferfrigor activities.

Ferfrigor decidedly believe that it is necessary to adopt behaviour ethically correct, with full respect both of laws, statutes and rules..

For this reason Ferfrigor underwrite this ethic code (the "Ethic Code") together with the model of organization, management and control (the "Model"), according to that foreseen by D.lgs. 231/2001 that introduce in the Italian law the Administrative responsibility of the juristic persons.

The attention for the development of an ethic behaviour has been stated, before all, with the redaction of the Ethic Code, that has been submitted to the Administration Manager for approval..

Ethic Code is a collection of principles and guide lines fixed to inspire the Ferfrigor activities and tend the behaviour of his staff, but also everyone that meets the Society during his activity.

The target is to get efficiency and seriousness of Society together with an ethic behaviour.

The issuing of Ethic Code take care, furthermore, of indications given by Confindustria that has prepared the guide lines (the "Guide Lines") for the construction of models for the organization, management and control to be adopted for the prevention of offences covered by the D.lgs. dated June 8th 2001, n. 231, covering the administrative responsibility of the Society.

Guide Lines foreseen, between the more important systems of control, to adopt the ethic code and recommend that the components of the control system have been conformed to the principles that, in the present ethic code have been take in consideration.

The Ethic Code, therefore, results as a components essential for the organization model and the control system adopted by Ferfrigor, with the conviction that the management of the activity is the real base for the success of our Society.

The Ethic code is delivered to all personnel and complete the respect of civil and penal rules that all persons have to respond, including the obligations included in the National workers contract..

For this reason the general concepts here listed have to be taken in consideration as basic for our behaviour.

This Ethic Code has been approved by the Ferfrigor Administrator Manager.

1.2 Mission

The Society Ferfrigor is present in the field of mounting and repairs of naval and industrial refrigerating plants since 1951 and installation of heating and air conditioning plants for civil building since 1997.

The administrative and operative office is at Genoa, Via al Molo Giano.

Ferfrigor believes fundamental following worth's:

- The respect of persons as essential resource for the existence and development of Ferfrigor.
- Professionalism and correctness of each individual , both staff, co-operator or outsider, are essential values for reaching the Society' targets.. Our staff , at every level, must support and cooperate in order to keep inside the Society the reciprocal respect to maintain dignity and reputation of everybody.
- Environmental protection, as fundamental element for the development of Society , in respect with National prescription and interest of community. This protection shall be assured by means of accomplishment and monitoring of the Society' process, the competence and know out of staff , the respect of National rules, the attention during project plan and during its realization, the use of existing technologies , are applied in order to minimize the environmental impacts.
- Health and security protection, to be followed with the main engagement , by the use of all the measures in order to have a working site suitable to grant health and security of all the staff , and with the recording the risks connected with the job typology of Society..

Ferfrigor has always kept into consideration the respect of these values as essential element to carry out his activities.

In this contest the choice to adopt an organization model finalized to prevent the offenses foreseen by D. Lgs. 231/2001, as completion of the path of the Society' development and the implementation of relationships with commercial partners and National Authorities..

1.3 Consignees

The Ethic Code is finalized to the social bodies and their components, to internal staff, temporary workers, consultants and co-operator at any title, to every subject that can act in the name and for account of Ferfrigor and, generally to all that are in contact during their activities (here called " Consignees ").

1.4 Range of application

The rules of the Ethic Code are an essential part of the contractual obligations of personnel according to the articles 2104 and 2105 of the Civil Code.

The art. 2104 c.c. called " Care of the workers", said : " the worker shall use the required care for the work typology carried out, for the interest of Society and for the superior National production. He shall furthermore follow the instructions for the execution and for the discipline of work given by the Manager and his co-operators , from whom hieratically depends".

The art. 2105 c.c. called "Fidelity Obligations", said : "the worker shall not carry out affairs, for his own account or for third parties, in concurrence with the Management , neither divulge news referred to the organization and to the methods of production of Society , or use them to bring any prejudice".

1.5 Contractual value of the Ethic Code

The observance of the Ethic Code is an essential part of the contractual obligations of Ferfrigor personnel , according to the effect of the articles 2104, 2105 and 2106 and the civil code . The art. 2106 called "*disciplinary sanctions* ", said : "*the non fulfilment of the rules included in the two previous articles can bring to disciplinary sanctions, according to the gravity of the infraction*".

The serious and continuous violation of these rules of the Ethic Code, compromise the trust existing with Ferfrigor and can bring to disciplinary actions and indemnity of damages , notwithstanding, for the workers the respect of the procedures foreseen by the art. 7 law n. 300/1970 (c.d. Workers' Statute) and by the national collective work contract.

The observance of the Ethic Code is an essential part of the contractual obligations of the co-operators. Any behaviour made by the co-operators that have relationship with Ferfrigor, in contrast with the rules foreseen by the Ethic Code, shall bring to an immediate resolution of the contract, other than eventual request of indemnity by Ferfrigor, if this behaviour cause damages to the Society.

1.6 Communication and diffusion of the Ethic Code

Ferfrigor provides to inform all Consignee about the application of the Ethic Code, and recommend the compliance of it. In particular , Ferfrigor provides, also by means of designation of specific inside functions:

- To the broadcasting of the Ethic Code to the Consignee;
- To the interpretation and clarification of the applicable arrangements;
- To the verification of the compliance of the Ethic Code;
- To update the rules according the exigencies that arise from time to time.

1.7 Monitoring on the application of Ethic Code and its updating

Ferfrigor engage himself to assure the respect of the Ethic Code, by means of the surveyors that have the task to control, monitoring , realize, update and apply the Code by take care of diffusion and clearness.

1.8 Information obligations

All personnel are asked to inform immediately and confidentiality to the Surveyors, who engage himself to assure the secrecy of the identity of the personnel involved, expert for the law engagements, any news received during their task, about the trespass of the giuridic, Ethic Code or other Society' rules that can regard or damage Ferfrigor at any title.

This signaling , as for any other trespass of the Ethic Code found upon this information activities, must be controlled and evaluated by the Surveyors. At the completion of this control and evaluation, to adopt eventual disciplinary actions, shall be the task of the appointed team.

1.9 Trespass of the Ethic Code

Trespass of the Ethic Code rules shall bring to disciplinary actions as foreseen by the National Work Contract in use , and furthermore, according to the gravity of trespass to eventual legal , civil and penal actions.

1.10 Revision of the Ethic Code

The revision , that is the updating of the Ethic Code, shall be approved by the Administration Manager of Ferfrigor also under proposal of the Surveyors..

Upon approval the document shall be immediately diffused to the Consignees.

Chapter 2 – Ethic principles.

2.1 Responsibility and carrying out of activities.

Consignees operate fairly, according the good faith, with care, efficiency and correctness, having its own management for the reciprocal cooperation and collaboration, with respect of the internal procedures , using equipments and time at best and assuming the connected responsibility related to the relevant job. The activity of everyone is inspired to the will to improve their competences and professionalism.

Each activity carried out for account of Ferfrigor shall be addressed to satisfy the agreement of the same. Therefore eventual clashing situations between personnel interest and those of Ferfrigor should be avoided, or preventively advised : since often at the clashing interest correspond the trespass of the applicable rules.

It is necessary in particular avoid that the involvement with institutions or associations, as well as all the situations connected with relationships of a personnel, can cause clashing interest with Ferfrigor.

During work's relation with third parties are forbidden gifts, benefits (both direct or indirect), premium, courtesy or hospitality, except those of nature and value not superior 500 Euro, so that it cannot be interpreted to get a treatment of favour, and anyway they cannot compromise directly or indirectly the image of Ferfrigor.

All actions or operations made and the behaviour kept by any Consignee during the function or carrying out of job shall be inspired at the legitimacy both under the formal and substantial aspect and at the protection of Ferfrigor, according to rules in force and internal procedure and furthermore at correctness.

The Consignee do not use for personal purposes information, capital goods and equipments, used during the carrying out of function or job assigned.

2.2 Protection of Society Property and information

Every Consignee is responsible of protection and preservation of Society Property , material and immaterial , got in trust for the accomplishment of their task, and furthermore of the use in a proper manner and in conformity at the Society's targets and to the specifications in force.

2.3 Gifts and other benefits.

The Consignees of the Ethic Code cannot accept, neither during festivities, gifts or other benefits referring to their activities and of small entity, as indicated in the procedure of Cash Management.

The Consignees shall avoid behaviours not accepted by specifications in force, from commercial use or eventual ethic codes of the societies or Administrations with which have performances.

Shareholders, Partners, Clients and Suppliers and anyone who have contacts with Ferfrigor will participate at the consolidation of the Society imagine faithful at valour's of correctness and loyalty.

Chapter 3 – Administrative and financial management.

3.1 Administrative management and final balance.

The issuing of the final balance or other type of administrative documents is carried out according to laws and rules in force, by using practice and accounting principles and reporting with fidelity the type of management according to clearness, trueness and correctness criteria.

Ferfrigor adopts the criteria of trueness, accurateness and clearness of information necessary to grant a transparent account report. These criteria represent and constitute a fundamental value for Ferfrigor and grant to the partners and third parties the possibility to have a clear evaluation of the economic, patrimonial and financial situation of Society.

For this target the documents shall be:

- Recorded on accounting dept. to confirm registration,
- Complete, clear, true, accurate and valid.
- Kept at record, for every verification, for the time required by law.

Anyone shall knows of any omissions, falsification, irregularity in the accounting and basic documents keeping , or violation of the principles fixed by the Ethic Code or laws in force , is obliged to advise immediately the Surveyors.

Above violations have a disciplinary relief and are properly sanctioned, since injure the Ferfrigor trust.

3.2 Payments

Ferfrigor does not make illegal payments of any type and marks every financial activities at the principle of total traceability and transparency.

Chapter 4 – Relationship with third parties.

4.1 Relationship with Public Administration.

The relationship with Public Administration, public officials or anyone charged of public service shall be inspired by the more severe compliance of the law and rules applicable and do not compromise the integrity or reputation of Ferfrigor.

Obligations and the management of relationship with above said subjects are connected exclusively at the Society' functions and at the assigned authorized personnel, with the maximum respect of the internal procedures and at the transparency principle.

Inside the relationship of those subjects the Consignee should not offer, neither by third parties, money or other utilities to the public officer involved or his family or other subjects connected to him, or try to have personal relationship of favour, influence with the target to condition, directly or indirectly the activity.

Are permissible only gifts of small entity on the bases of specific authorization given by the manager.

4.2 Relationship with politic organizations, Labours and grade.

Ferfrigor do not give contributions, direct or indirect, of any type, to politic organizations, organizations , politic or Labours committee, to their representative or candidate, exception made to those foreseen by specific rules.

4.3 Relationship with suppliers.

The choice of suppliers is inspired by objectivity, competence, transparency, economy and correctness principles, in respect with the internal procedures and applicable rules.

To suppliers is required:

- The respect of law, usages and customs applicable;
- To uniform himself to the principles of the Ethic Code;
- To uniform himself to the principles of Organization, Management and Control of Ferfrigor;
- To respect the rules in force for work, with particular attention to juvenile work and to those indicate by the health and security law.;
- Do not support in any manner directly or indirectly terroristic associations or mafia;
- To grant and respect the human rights of workers.

4.4 Relationship with Clients

Relationship with Clients are marked to the full satisfaction of their exigencies with the target to create a solid relationship inspired by correctness, honesty, efficiency and professionals principles.

Chapter 5 – Human resources

5.1 Workers protection

Ferfrigor grants the liberty of workers associations. He rejects any discrimination due to age, sex, healthy, race, nationality, politic opinions or religion, repudiate all type of discrimination in the engagement and human resources management.

Furthermore Ferfrigor engages himself to prevent any type of mobbing and work exploitation , both direct or indirect, and recognize the criteria for the increase of retribution and career of each worker.

5.2 Respect and evaluation of human resources.

Human resources are an indispensable element for the existence, the development and the success of every society: Ferfrigor, therefore, keeps particular attention to the evaluation, protection and development of the capacities and competences of all his personnel, so that they can express at best their potentiality and professionalism and , therefore, aid to reach society' targets, in respect of social and environmental responsibilities, as established by Ferfrigor Manager.

Chapter 6 – Environmental, Health and Security.

6.1 Environmental protection

Ferfrigor is engaged for the protection of environmental as primary heritage. At this purpose choice his decisions in order to grant the compatibility between economic enterprise and environmental exigencies.

Ferfrigor is sure that the full compatibility of his activities with the territory and environmental is a primary condition both for the acceptability of his activities and for reach his development targets: of this responsibility are charged Administrators, managers and all personnel and co-operators of the Society.

6.2 Health and security protection

In full accomplishment to the Health and Security rules, Ferfrigor diffuses the culture of security on work sites, , promote responsible behaviours of personnel and supply suitable instruments to prevent work 'accidents' in order to protect the health of his personnel.

Therefore, each activity of Ferfrigor and each single personnel will be directed to the respect and protection of security on the work site, accurate respect of the rules and law obligations and furthermore to the respect of the measures required by internal rules and procedures.

The Consignee of the Ethic Code, inside their tasks, take part to the risks prevention process, for their own, for colleague and third parties.

6.3 Duties of workers for health and security on work site.

Worker must take care of his own security and health, and those of other persons in the work site, person who can have negative effects for his actions or omissions, in conformity with his training , instruction and means supplied by the manager, and observing the disposals and instruction given by managers, appointed person, for the protection of himself and other person.

Chapter 7 – Informatics system

7.1 Use of informatics system

In respect of the informatics system, every personnel of Ferfrigor is responsible for the security and care of the informatics system and subject to the general and society' rules in force and at the conditions of license' contracts.

Expectation made for what foreseen by civil and penal laws, is considered improper the use of capital goods and society' resources to connect the web site for reasons different from the ones connected to the work relations.

Every personnel is required to put the necessary care in order to prevent any crime by means of the use of informatics instruments.