



PRESSOFUSIONI s.r.l.

Die casting aluminium

Code of Ethics

Pursuant to Legislative Decree 231/01

This document is property of FBL srl, its diffusion or reproduction without authorisation is prohibited.

SUMMARY

1 – APPROVAL OF DOCUMENT AND AMENDMENTS	3
2 - GENERAL PRINCIPLES	4
3 – GUIDE TO USING THE CODE.....	4
4 – BUSINESS CONDUCT	5
5 - EMPLOYEES	7
6 – HEALTH AND SAFETY AT WORK AND PRIVACY.....	8
7 – RELATIONS WITH THE COMMUNITY AND THE ENVIRONMENT.....	10
8 – DISCIPLINARY SYSTEM	11

1 – APPROVAL OF DOCUMENT AND AMENDMENTS

Issued by:	Date:	Approved by:	Date:
Management, S.G. Quality,	28th February 2018	Management	28th February 2018

AMENDMENTS

Index:	Description:	Date:	Notes:
00	First edition	28th February 2018	
01	Revised and updated	22nd March 2019	Adapted to customer requests

2 – GENERAL PRINCIPLES

FBL srl (hereinafter also referred to as the "Company") IS AN ITALIAN BUSINESS WITH PLANTS FOR THE MANUFACTURING OF ALUMINIUM ALLOY COMPONENTS OBTAINED THROUGH THE DIE-CASTING PROCESS.

This code of conduct (hereinafter also referred to as the "Code") is intended as a guide and support for every manager and other employee of the Company to help them pursue the Group's mission.

At the same time, the Company undertakes to:

- ensure the dissemination of the Code;
- guarantee the updating of the Code;
- provide information support in case of doubts regarding the interpretation of the Code;
- ensure that anyone who reports violations of the Code in good faith is not subject to any form of revenge;
- adopt sanctions that are reasonable and commensurate with the type of violation and that such sanctions are applied consistently to all recipients of the Code;
- periodically monitor compliance with the Code;

3 – GUIDE TO USING THE CODE

Code description

The Code is a document approved by the Company's management that summarises the principles of business conduct and ethical behaviour for the Company's managers and employees. It contains the essential values, reference standards and rules of conduct, as well as the principles to which the conduct of those acting on behalf of and in the interests of the Company must be oriented.

Recipients of the Code

The Code applies to all Company employees acting in the name and on behalf of the Company. Recipients are obliged to report any suspected violation of the Code choosing between these two manners:

- by filling in the Form attached to this Code and hand delivering it to the Management;
- by filling in the Form attached and sending it by e-mail to the Management.

The Code is written in Italian and in the languages spoken in the countries where the Company's plants are located.

Obtainability of the Code

The Code is posted on all company notice boards and is available at the following network path: [All / Quality / Code of Ethics](#), to ensure dissemination to all employees.

A copy of the Code can be requested from the Human Resources.

Each Entity Manager must ensure that his or her employees are aware of the existence of the Code.

Any amendments to the Code will be made available in the manner set out above.

4 – BUSINESS CONDUCT

The Company will not tolerate the use of tools including bribery and extortion in any situation, not even to increase business or to acquire new orders from customers.

Relations with the Company's partners (customers, suppliers, credit institutions and authorities, etc.) must be based on honesty and respect for the laws in force.

The Company's management will never accept any of its employees being actively or passively involved in corruption with customers or supporting any action that could be suspected of corruption.

Before establishing business relations with third parties, the Company's employees must check **and operate**, as far as possible, **in accordance with international trade laws and** available information on potential counterparties (customers and suppliers) in order to ascertain their respectability and the legitimacy of their activities.

In particular, the selection of suppliers, external collaborators, the choice of purchases of goods, merchandise and services must be carried out according to the principles of this Code and of the internal procedures, by using the written form.

In dealing with the Company's partners, donations, gifts, benefits (both direct and indirect), free gifts, acts of courtesy and hospitality aimed at obtaining favourable treatment are prohibited; so-called customary gifts (i.e. those gifts that custom requires to be exchanged on the occasion of special festivities as for instance at Christmas) if practised as custom, shall meet the dual requirement of tenuity (i.e. modest symbolic value) and equality (i.e. equal cost in the choice of the gift for all recipients).

In any case, any gift made on a personal initiative or from one's own funds or not previously allocated for that purpose is forbidden ; this implies an unavoidable obligation to document the expenses made and to report them transparently.

The Company also wants to guarantee the full satisfaction of its customers' needs in order to create a solid relationship inspired by values of fairness, loyalty, efficiency and professionalism, ensuring relationships based on respect for the law.

To this end, it is necessary that:

- customers are adequately informed about what is done in the performance of activities in their favour;
- customers are not promised, in any way, results that are not the responsibility of the Company;
- customers are not advised and/or suggested to act or behave in a manner contrary to applicable legislation;
- donations, contributions, fees, reimbursement of expenses and any other form of economic relationship with customers shall be established with the utmost transparency and in compliance with current legislation.

5 – EMPLOYEES

The Company:

Supports and respects the protection of internationally recognised human rights.

1. Takes care that there is no complicity in the abuse of human rights.
2. Defends the freedom of association and the effective recognition of collective bargaining rights.
3. Eliminates all forms of forced and compulsory labour.
4. Rejects the use of child labour.
5. Removes discrimination in respect of employment and occupation (equal opportunities).
6. Combats corruption in all its forms including extortion and bribery.

This Code is an integral part of the employment relationship for every employee of the Company. Consequently, the Company requires strict compliance with the provisions of the Code by all employees.

It is the obligation of those concerned to document all activities related to important processes and to report the results to the bodies responsible.

It is forbidden for all employees to accept payments of money or goods/benefits or services of any kind that may be aimed at the recruitment of an individual as an employee or his transfer or promotion.

Any relations with public institutions, or with their relatives and relatives-in-law, must be conducted in such a way that they cannot be interpreted as aimed at acquiring undue advantages for the Company itself.

In this regard, any requests for or offers of money or favours of any kind that may be interpreted as exceeding normal business practices or courtesy, or in any case aimed at acquiring favourable treatment in the conduct of any operation related to the Company's business unduly formulated to those, or by those, who operate on behalf of the Company in the context of relations with the Public Administration shall be immediately brought to the attention of the Management and the consequent measures shall be taken.

All employees are therefore required to:

- read the Code;
- adopt actions and behaviours consistent with the Code;
- promptly and in good faith report any violations of the Code;
- consult Management for clarification on the interpretation of the Code;
- support FBL's interests by avoiding anything that might create a conflict of interest, for example private work by one of our employees for one of our clients or competitors no earlier than 3 years after leaving FBL;
- maintain a level of confidentiality when disclosing sensitive FBL information.

6 – HEALTH AND SAFETY AT WORK AND PRIVACY

The Company recognises Health and Safety in the workplace as a fundamental right of employees.

Employees and partners are an essential resource for the success of the Company and, therefore, the Company protects and promotes the value of human resources, in order to improve and increase the experience and skills possessed by each collaborator and guarantees working conditions that respect individual dignity.

The Company adopts health and safety policies that comply with the provisions of current legislation. These policies are based on preventive measures, both individual and collective, in order to minimise potential risks in the workplace.

The Company also fosters a culture of accident prevention through training and information courses.

The Company shall therefore carry out its activities according to the following principles :

- making the entire company organisation, from the Employer to each worker, responsible for aspects relating to health and safety at work, each according to his or her own powers and competences, in order to avoid prevention activities being considered the exclusive competence of some subjects with a consequent lack of

- active participation by some recipients;
- commitment to consider these aspects related to health and safety in the workplace as an integral part of corporate management, the knowledge of which must be guaranteed to all addressees;
 - commitment to continuous improvement and prevention;
 - commitment to provide the necessary human and instrumental resources, evaluating the appropriateness of investments for new facilities, and considering in this assessment, in addition to the economic and financial aspects, also the aspects of safety and protection of workers' health;
 - commitment to promote collaboration with the competent authorities (e.g. INAIL, ASL, etc.) in order to establish an effective channel of communication aimed at continuously improving performance in terms of safety and health protection of workers;
 - commitment to constantly monitor the situation of company accidents in order to guarantee control, identify critical points and related corrective actions.

In addition to the Company, employees must also:

- comply with the provisions and instructions given by the Employer, Managers and the Person in charge, for the purposes of collective and individual protection;
- correctly use machinery, equipment, tools, dangerous substances and preparations, means of transport and other work equipment, as well as safety devices;
- properly utilize the protection devices made available to them;
- immediately report to the Employer, the Manager, the Person in charge the inadequacies of the means and devices of the previous points, as well as any other dangerous conditions of which they become aware, taking direct action, in case of urgency, within their competences and possibilities in order to eliminate or reduce such deficiencies or dangers.
- not remove or modify safety, signalling or control devices without authorisation;
- take care of the personal protective equipment made available to them, without making any changes on their own initiative;
- not carry out on their own initiative operations or manoeuvres that are not within their competence or that may compromise their own safety or that of other

workers;

- take part in the education and training programmes organised by the Employer;
- undergo the health checks provided for them in order to define the implementation and control of workers' health care in each of the Company's depots.

Privacy

In compliance with current legislation, the Company undertakes to protect the privacy of information concerning the private sphere and opinions of each of its workers and, more generally, of those who interact with the Company.

In particular, respect for the dignity of workers shall be ensured also through the respect of privacy in correspondence and interpersonal relations between staff, through the prohibition of intrusions or forms of control that may harm their personality.

7 – RELATIONS WITH THE COMMUNITY AND THE ENVIRONMENT

In carrying out its activities, the Company is committed to safeguarding the surrounding environment and contributing to the sustainable development of the territory.

The Company, sensitive to the issues of sustainable development and environmental protection, considers among its primary objectives the commitment to research and continuous improvement of production processes in compliance with current regulations, environmental requirements and the common interest by applying the best available technologies economically feasible in order to minimise the direct and indirect environmental impact.

In order to implement a concrete environmental policy, the Company shall raise the awareness of management and employees and promote initiatives, actions and improvement programmes for widespread environmental protection.

The Company's commitment is expressed through the implementation of the following actions:

- the reduction of energy consumption and the rational and increasingly efficient use of energy;

- the reduction of all forms of waste of resources, favouring prevention and recovery actions;

In particular, all collaborators are required to:

- strive for a correct use of energy resources and avoid wasting them, through simple daily behaviours such as: turning off the light and electrical equipment when leaving the workplace, checking that water taps are turned off, printing documents only when strictly necessary;
- ensure adequate separation of waste materials to enable their proper disposal and recovery.

8 – DISCIPLINARY SYSTEM

General criteria for imposing sanctions

The Company provides for a graduation of the applicable sanctions, in relation to the degree of severity that the conduct may present with respect to the carrying out of unlawful acts.

In individual cases, the type and extent of the specific sanctions shall be applied in proportion to the seriousness of the misconduct and, in any case, in consideration of the following elements listed below:

- subjective element of the conduct, depending on whether it is intentional or negligent;
- relevance of the breached obligations;
- level of hierarchical and/or technical responsibility;
- presence of aggravating or mitigating circumstances with particular regard to professionalism, previous work experience, the circumstances in which the act was committed;
- any sharing of responsibility with other persons who contributed to the failure to act;

If several infractions, punished with different sanctions, have been committed in a single act, the most serious penalty may be applied. Any imposition of a disciplinary sanction, regardless of whether or not proceedings have been instituted and/or the outcome of any criminal trial, shall be inspired, as far as possible, by the principles of timeliness.

Sanctions

In the event of non-compliance with the provisions set out in the Code, and in proportion to the seriousness of the infringements, the following sanctions shall be applied to employees:

- verbal warning;
- written warning;
- fine of up to four hours' pay and cost-of-living allowance;
- suspension from work and pay for a period not exceeding three days;
- dismissal for misconduct in accordance with the relevant CCNL;

In case the above-mentioned employees have a power of attorney with the faculty to represent the Company externally, the imposition of the sanction may entail the revocation of such power of attorney.

MANAGEMENT