

Hausbrandt Trieste 1892 S.p.a.

Via Foscarini, 52
Nervesa della Battaglia (TV), Italy

Code of Ethics

(Article 6 of Legislative Decree no. 231/01)

Title	Code of Ethics		
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1. PURPOSE

By means of this Code of Ethics Hausbrandt Trieste 1892 Spa intends to define and explain the values and principles of conduct informing its activity and its relations with all the subjects with whom it enters into relation to achieve its corporate purpose.

The Company undertakes to ensure to all those having relationships with it, whether employees, customers, suppliers or, in general, interested parties, that the Company's activities will be carried out in full compliance with the law, within a framework of fair competition with honesty, integrity, fairness and good faith, in accordance with the legitimate interests of employees, shareholders, customers, business and financial partners.

This Code of Ethics is an integral part of the Organisation, Management and Control Model of the Company provided for in Articles 6 and 7 of Legislative Decree no. 231/2001.

2. PRINCIPLES OF CONDUCT

2.1 Legality, fairness and honesty

Hausbrandt Trieste 1892 Spa operates in compliance with the laws in force in Italy and, as applicable, with the legislation in force in the other countries in which it operates, as well as in compliance with professional ethics.

The pursuit of the Hausbrandt Trieste 1892 Spa interest may never justify any kind of conduct contrary to the principles of legality, fairness, honesty and professionalism.

It is therefore always refused any form of benefit, whether received or offered, which can be understood as an instrument intended to influence the independence of judgment and conduct of the parties involved.

Any practice of corruption, illegitimate favour, collusive behaviour, direct and/or through third parties' solicitation, personal advantages for themselves or others, is strictly prohibited.

Acts of commercial courtesy, such as gifts or forms of hospitality, are only permitted when they are of modest value and in any case such as not to compromise the integrity or reputation of one of the parties and that they cannot be interpreted, by an impartial observer, as intended to acquire advantages improperly.

2.2 Loyalty and good faith

Relations with recipients and with third parties in general must be based on good faith and honesty, to be carried out with reliable behaviour regarding the sustainability of the understandings, the fulfilment of agreements and promises, the enhancement of company assets and the pursuit of good faith behaviour in every decision.

2.3 Conflict of interest

In carrying out every activity Hausbrandt Trieste 1892 Spa operates without incurring situations of real or even potential conflict of interest, which can interfere with the ability to take impartially decisions in the best interest of the Company and in full compliance with the rules of the Code.

By way of example, the following situations lead to conflicts of interest:

- economic and financial interests of the employees and/or their family in the activities of suppliers, customers and competitors;
- use of their position in the company or the information acquired in their work so that this can lead to conflicts between personal interests and business interests;
- carrying out work activities, of any kind, with customers, suppliers, competitors;
- acceptance of money, favours or utility by persons or companies that are or intend to enter into business relations with Hausbrandt Trieste 1892 Spa.

2.4 Free competition

Hausbrandt Trieste 1892 Spa recognises free competition, provided fair, as a determining factor for the growth and constant improvement of the company.

2.5 Equity and Equality

In relations with all its counterparts, Hausbrandt Trieste 1892 Spa avoids any kind of discrimination based on age, racial and ethnic origin, nationality, political opinions, religious beliefs, gender, sexuality or the health of its interlocutors.

2.6 Professionalism and valorisation of resources

Hausbrandt Trieste 1892 Spa guarantees an adequate degree of professionalism in the execution of the tasks entrusted to its employees.

To this end, it enhances the skills of its resources, providing the same appropriate training, professional updating and development tools.

2.7 Confidentiality

Hausbrandt Trieste 1892 Spa guarantees, in accordance with current legal provisions, the confidentiality of the information in its possession.

Employees of Hausbrandt Trieste 1892 Spa are prohibited from using “confidential” information for purposes other than the performance of their professional activity.

2.8 Workers' health and safety protection

The employees of Hausbrandt Trieste 1892 Spa, regardless of the type of contractual relationship,

are guaranteed decent working conditions, in safe and healthy working environments.

In particular Hausbrandt Trieste 1892 Spa:

- considers compliance with legislation and agreements applicable to workers' safety and health as a priority;
- considers the management of workers' safety and health as an integral part of the overall management of the organisation;
- promotes the involvement, cooperation and collaboration of all company resources on the workers' safety and health themes;
- guarantees the necessary resources for the correct management of occupational safety and health issues.

2.9 Environmental protection

Hausbrandt Trieste 1892 Spa is committed to protecting the environment. Its choices are oriented in such a way as to ensure compatibility between its economic initiative and environmental needs, in compliance with current legislation.

2.10 Use of the Company's intellectual and material assets

The use of the Company's intellectual and material assets, including IT tools, must take place in compliance with the general rules and their intended use, in order to protect their preservation and functionality, avoiding their use in violation of any provision of the law.

3. GUIDELINES FOR RELATIONS WITH COUNTERPARTIES

3.1 Customer Relationships

Hausbrandt Trieste 1892 Spa orients its activities to the satisfaction and protection of its customers, paying attention to requests that can encourage an improvement of the quality of the products and services offered.

The information and documentation provided to its acquired or potential customers about the products and services offered or the experiences and references owned by Hausbrandt Trieste 1892 Spa are true, accurate and comprehensive so that customers can make informed decisions.

The negotiations conducted directly by Hausbrandt Trieste 1892 Spa staff or through its sales network, the contractual relations and communications of Hausbrandt Trieste 1892 Spa are inspired by the principles of ethics, honesty, professionalism, transparency and in any case based on greatest collaboration.

Compliance with these principles is required of all those who provide and/or promote and/or sell goods and/or services on behalf of Hausbrandt Trieste 1892 Spa and, in general, to anyone representing it.

3.2 Relationships with the market and users/consumers

Hausbrandt Trieste 1892 Spa believes in free and fair competition and orients its actions to obtain competitive results rewarding capacity, experience and efficiency.

Hausbrandt Trieste 1892 Spa is committed to respecting the right of users and consumers not to receive products harmful to their health and physical integrity and to have complete information about the products and services offered.

Any action aimed at altering the conditions of correct competition is contrary to the policy of Hausbrandt Trieste 1892 Spa and is forbidden to any person acting for it.

3.3 Relationships with partners and suppliers

Partners and suppliers of Hausbrandt Trieste 1892 Spa make possible, thanks to their collaboration, the concrete realisation of the business activity.

The Company undertakes to:

- develop fairness and cooperation relationships with partners and suppliers based on a communication aimed to enable mutual exchange of skills and information and to promote creation of common value;
- guarantee to each company meeting the required requirements the possibility to compete to win a supply, adopting objective evaluation criteria in the selection procedure, in accordance with declared and transparent methods;
- observe the contractually stipulated conditions and terms.

3.4 Relationships with collaborators

Hausbrandt Trieste 1892 Spa recognises the importance of its employees and collaborators as one of the fundamental factors for the achievement of company purposes and adopts procedures and methods of selection, development, evaluation and training aimed at ensuring maximum fairness and equal opportunities without discrimination of gender, race, age, sexual orientation, religious beliefs and any other factors. People are recruited on the basis of their experience, aptitude and skills. Recruitment is based solely on the correspondence between expected profiles and required profiles.

The Company undertakes to offer all its collaborators the same opportunities, ensuring that everyone can enjoy fair treatment based on strictly professional merit criteria for any decision relating to professional life, without any discrimination.

Hausbrandt Trieste 1892 Spa manages the activities in compliance with the mandatory regulations concerning the conditions of the working environment, committing itself to create a decent and respectful environment for all.

The Company is committed to spreading and consolidating the culture of safety by developing risk awareness and knowledge and compliance with current legislation on prevention and protection by promoting responsible behaviour by all workers.

Hausbrandt Trieste 1892 Spa expects all employees to cooperate in maintaining a business atmosphere based on respect for individual dignity, honour and reputation and will intervene to prevent abusive or defamatory interpersonal attitudes.

3.5 Relations with the Public Administration and other external parties

Hausbrandt Trieste 1892 Spa, through its own staff and facilities, cooperates actively and fully with the Authorities.

All relations with the Authorities and the Public Administration are based on principles of fairness, transparency, collaboration and non-interference, in compliance with each other's roles and procedures.

It is forbidden to make, induce or favour false statements to the Authorities.

Hausbrandt Trieste 1892 Spa does not support demonstrations or initiatives with exclusively or predominantly political purpose and refrain from any direct or indirect pressure on politicians.

4. SOCIAL COMMUNICATIONS AND PROTECTION OF SOCIAL HERITAGE

Hausbrandt Trieste 1892 Spa ensures the keeping of accounting records, the formation and preparation of the financial statements, reports, social communications in general and anything else provided, in accordance with law provisions, international principles, technical standards in force.

Hausbrandt Trieste 1892 Spa promotes correct and timely information to all the bodies and functions involved in the preparation of the financial statements, reports, social communications in general and whatever required for its operation.

Moreover, the company determines the correct cooperation between the bodies and the corporate functions and encourages controls by the competent bodies.

All are required to comply with the rules aimed to protect the integrity and effectiveness of the share capital, in order not to undermine the guarantees of creditors and third parties in general.

5. IMPLEMENTATION

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

In compliance with current legislation and in view of planning and management of business activities aimed at efficiency, fairness, transparency and quality, Hausbrandt Trieste 1892 Spa adopts organizational and management measures suitable to prevent unlawful conduct or otherwise contrary to the rules of this Code of Ethics by any individual acting for the Company.

Cases of violation of this Code of Ethics may be reported by each recipient in confidential or anonymous form directly to the Supervisory Body.

The procedures for reporting and verifying infringements are based on criteria of privacy and

protection of confidentiality in order to prevent retaliation of any kind against the reporting individual but also in order to ensure the ascertainment of the facts.

6. SANCTIONS

In order to ensure the correct and effective implementation of this Code of Ethics, the collaboration of all is necessary.

Breach of its provisions shall constitute a disciplinary offence and failure to comply with the contractual obligations of the employment or functional employment relationship or professional cooperation.