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D. Lgs. 231/2001

ETHIC CODE

SUMMARY:

1. ETHIC CODE – BODY OF SURVEILLANCE	3
2. “MISSION” AND VISION OF ETHICS	3
3. ADDRESSEES AND FIELD OF CODE APPLICATION	3
4. REFERENCE PRINCIPLES	3
4.1 LAW RESPECT	
4.2 HONESTY	
4.3 CLEARNESS AND COMPLETENESS OF INFORMATION	
4.4 CORRECTNESS IN THE SOCIETY MANAGEMENT AND IN THE RESOURCE USE	
4.5 PRIVACY OF INFORMATION	
4.6 RESPECT OF THE PERSON	
4.7 PREVENTION OF INTEREST CONFLICT	
4.8 PROTECTION OF ENVIRONMENT, SECURITY AND ECO-FRIENDLY DEVELOPMENT	
5. BEHAVIOR REGULATIONS	
5.1 ACTIONISTS	
5.2 CORPORATE NOTICE	
5.3 HUMAN RESOURCES	
Staff selection and constitution of the working contract	
Management politics of human resources	
Safety and security	
Information and privacy management	
Interest conflicts	
Use and protection of assets of Society	
Respect of regulations that are in the Code of Conduct	
5.4 Customers and Suppliers	
Integrity and independence in relationship with customers and suppliers	
Protection of ethics-environmental aspects in supplies	
5.5 Environment and security	
5.6 Collectivity	
Relation with politics and union organizations	
Relation with not-for-profit realities	
Relation with mass medias and diffusion of information	

5.7 Public Administration

INTERNAL CONTROL SYSTEM AND ETHIC CODE REALIZATION WAYS

INTERNAL CONTROL SYSTEM

Body of Control on Ethic Code

Communication and formation

Warning of interested subjects

Ethic code violations

Guide lines of sanction system

1. CODE OF CONDUCT – BODY OF SURVEILLANCE

Istituto Giordano SpA unified the conduction of its activities with the respect of principles and regulations of behavior, which are mentioned in the Ethic Code. IG admits the importance of ethic-social responsibility and the environment protection in the conduction of business and activities of the Society and, for this purpose, promotes a management of the Society based on a balance of allowed interests of its stakeholder and the collectivity in which it operates. The Code is, for this reason, oriented to a perfect cooperation and respect of all interests of the involved parts. The stakeholder are the human resources (dependent and workers), customers, actionists, suppliers, public administration, the collectivity and all subjects, who are involved directly or indirectly in the Society activities. In the field of internal control system, the Ethic Code is (according to the sixth and the seventh clauses of D. Lgs. n. 231 of 2001 and according to the “Guide Lines for the construction of organization, management and control models ex D.Lgs 231/01” issued by Confindustria on 07/03/2002) a requirement and a reference of the organization, management and control Model of IG (“Model 231/01” below) and of the expected sanction system. The test of Ethic Code realization and its application is carried out by Society Administration Council and the society management, which can promote proposals of integration or content changes. The Administration Council has to update the Ethic Code in order to adapt it to an eventual new regulation and to the civil sensibility evolution. For eventual violations, which are expected by D.lgs. 231/01, there is a Vigilance Body that verifies the operation and observance of 231/01 Model for the prevention of violations. The Vigilance Body can enter to all the information sources of the Society, can take the vision of documents and it can consult data, it suggests eventual Ethic Code and 231/01 Model updates, even on the base of warnings given by workers. With the purpose of guarantee the realization of 231/01 Model, the Society – in the respect of privacy and individual rights – gives information channels, which everyone can use and if someone finds out eventual illegal behaviors in the Society, can them reports, in the reserved way, directly to the Vigilance Body.

2. “MISSION” AND VISION OF ETHICS

IG works in the certification and laboratory tests sector, and also the research sector, proposing itself to industrial operators and users, and final consumers as a solid and reliable partner, which is able to satisfy their needs and expectations. The Society works for a continuous improvement of processes, taking the inspiration from some essentials values:

- Working according to principles of impartiality, independence and professional integrity in order to support the certifications credibility, and give a qualified service, which is constant in its characteristics, sure and guaranteed;
- Rationalizing the society management in all its areas;
- Recognizing an irrevocable role of formation and the entire personnel involvement,
- Integrating into the efficacy and efficiency aims, the principles of sustainable development and prevention of injuries on workplaces, which are irrevocable requirements for a responsible and durable presence into the marketplaces.

3. ADDRESSEES AND FIELD OF CODE APPLICATION

The addressees of Ethic Code are all of workers and coworkers of Society, who, directly and indirectly, permanently or temporary, establishes relations with IG. For this reason, IG promotes the largest diffusion of the Code for all interested subjects, the good interpretation of its content, and gives the best in-

struments in order to support its application. IG also uses the essential measures in order to realize tests and monitoring activities of the application of the Code. For this purpose there is a Body of Control, with the task of monitoring on the Ethic Code application.

4. REFERENCE PRINCIPLES

4.1 LAW RESPECT

Values like compliance to laws, clearness and management accuracy, trust and cooperation with stakeholders are ethic principles, to which IG inspires of and from which are originated its conduct models, in order to efficaciously compete on the market, improve its customers satisfaction, increase the value for actionists and develop competences and professional growth of its human resources. For this purpose IG, requires from its business partners, administrator and workers, and everyone who realizes representation functions, the respect of legislation and all of the applicable regulations and principles and procedure, that are ethically correct behavior, such as not to compromise their moral and professional reliability.

4.2 HONESTY

Honesty represents the fundamental principle for all the activities of IG, its ventures, its audit reports, its communications and it constitutes an essential element of management. Every relation with stakeholders, aims at criterion and behavior of correctness, collaboration, loyalty and mutual respect.

4.3 CLEARNESS AND COMPLETENESS OF INFORMATION

IG recognizes the fundamental value of the correct information of actionists, to the competent bodies and functions, with regard to significant facts concerning corporate and accounting management.

4.4 CORRECTNESS IN THE SOCIETY MANAGEMENT AND IN THE RESOURCE USE

IG pursues its social object in respect of the law, of the Statute and social regulations, ensuring the correct functioning of social authorities and the protection of equity and participatory rights of its actionists, safeguarding the integrity of the social capital and assets.

4.5 PRIVACY OF INFORMATION

IG ensures privacy of its information, the observance of the regulation about personal data and it abstains from researching reserved data through illegal ways. Every information that is available of IG, are treated in the respect of privacy of interested subjects.

4.6 RESPECT OF THE PERSON

IG promotes the respect of physical and cultural integrity of the person and the respect of dimension of relation with others. It guarantees work conditions, which are respectful of the individual dignity an safe workplaces, and it applies to its workers the legislation and work contracts in force. The Society takes in principles of European Conduct Code which is issued on 27/11/91.

4.7 PREVENTION OF INTEREST CONFLICT

In order to avoid situations, even potential of interest conflict, IG, when it gives the role or starts a work report, it requires to its administrators, workers and various collaborators, to sign a specific declaration, which excludes the presence of condition of interest conflict between individual and Society.

IG even requires that, everybody, who knows about interest conflict, gives timely the communication to the Control Body on Ethic Code.

4.8 PROTECTION OF ENVIRONMENT, SECURITY AND ECO-FRIENDLY DEVELOPMENT

The environment is a primary asset that IG safeguards, in the respect of sustainable development principles. For this purpose, the Society organizes its activities, continuously researching a balance between economic initiatives and social and environmental needs and it spreads the culture of security and the prevention of risks in all the stakeholders.

5. BEHAVIOR REGULATIONS

5.1 ACTIONISTS

IG creates the conditions so that the participation of actionists to decisions of their competence is widespread and informed, it promotes the equality and completeness of information and protects its interest. The corporate governance System adopted by IG, is in compliance with that, predicted by the law and it is particularly addressed to:

- Realize the biggest clearness with stakeholders of the company;
- Control risks;
- Answer to legitimate expectancies of actionists;
- Avoid every type of operation in prejudice of creditors.

5.2 CORPORATE NOTICE

IG ensures the keeping of accounting records, the preparation and redaction of financial statements, the financial statements infra-annual, reports, prospectuses, corporate communications in general and anything else required for its operation, in compliance with the provisions of the law, the principles and the technical standards in force. IG monitors, for this purpose, on work of the administrators, general directors, or people, who are undergone to their surveillance with any title in activities of accounting, financial statement or other similar documents. IG supports a correct and timely information to all interested bodies and functions to the formation of financial statement of exercise, infra-annual financial statements, relations, prospectuses, social communications and what other is required for its functioning, in compliance with law regulations, principles, technical regulations in force. It determines the correct collaboration between the predicted bodies and society functions and it supports expected controls by competent bodies and functions. Every operation and agreement are correctly registered, authorized and a trace of it is conserved, in order to consent the correct accounting registration, individuation of different levels of responsibility and accurate reconstruction of operation, even to reduce chances of interpretive mistakes.

5.3 HUMAN RESOURCES

IG recognizes the focus of stakeholder Human Research and the importance of fixing and maintaining relations based on loyalty and mutual faith. In this sense, Human Resources are workers and collaborators who works in favor of Society in different contractual forms from those of the subordinated work. All workers/collaborators make an effort to operate with loyalty in order to respect the undertaken obligations from the work contract and from that is expected in the Ethic Code, ensuring performances, which are required from them and respecting the undertaken tasks.

Staff selection and constitution of the working contract

To be hired workers evaluation, is realized basing on the correspondence of contestant profiles compared to those expected and to the Society needs, in the respect of impartiality principles and equal opportunities for interested subjects. All the personnel is employed with a regular work contract; it isn't allowed any form of irregular or black work. When starts the collaboration, the worker/collaborator receives complete information regarding work and function characteristics, normative and remunerative elements and regulations and behaviors for the management of connected risks to the personal safety.

Management politics of human resources

It is forbidden any form of discrimination into regard of people. Every decision, which is taken in the field of management and development of human resources, are based on considerations of credit profiles and/or correspondence between expected profiles and owned profiles of collaborators. The same thing happens for the access to roles or different tasks. In the management of hierarchical relations, the authority is operated with equality and correctness, avoiding any violation. It is considered as a violation of authority position, requiring, as a deed due to the hierarchical superior, performances, personal favors and any behavior which constitutes a violation of Ethic Code. Human resources are completely valorized through the activation of available levers in order to support their development and their growth.

The competent functions must :

- Provide to selection, employ, form, pay and manage workers or collaborator without any discrimination;
- Create a workplace in which personal characteristics can't create any discrimination;
- Adopt credit, competence and strictly professional criterion for any decision related to a worker or collaborator.

Security and safety

IG promotes and spreads the security culture, developing the awareness of risks management, promoting responsible behaviors and preserving, overall with preventive actions, security and safety of all workers and collaborators. All workers and collaborators have to respect the regulations and obligations, which descending from the reference regulation in the theme of security and safety, and also all the measures of security and safety planned by procedures and internal regulations.

Information and privacy management

Workers and collaborators' privacy is protected in respect of the reference regulation, even through operative standards, which specify the received information and the relative ways of treatment and conservation. It is excluded every investigation on ideas, preferences, personal tastes and private life of people. Workers/collaborators have to know and realize what is expected from the Society politics in the theme of security of information, in order to guarantee the integrity, privacy and availability. It is an obligation of every worker/collaborator to ensure the privacy, required from circumstances for every news, learned in relation to the own working function.

Interest conflicts

Every worker/collaborator of IG is held to avoid every situation and activities in which a conflict of interests of Society can appear or they can meddle with their own abilities of taking impartial decisions in the best interest of the company and in the entire respect of Code regulations. Moreover,

he has to abstain of obtaining personal advantage from provision acts of social assets or from busy opportunities, which has known during his functions. IG recognizes and respects the right of its workers and collaborators to take part to investments, business or other type of activities which are external from those conduct in the interest of the Society, provided that they are activities approved by the law or the contractual regulations, that are compatible with the obligations employed in quality of workers and collaborators. Every situation, which can be or determine an interest conflict, has to be timely communicate by every worker/collaborator to their own superior or company representative, or to the appointed vigilance body on the Ethic Code. In particular, every worker and collaborator of IG have to avoid interests conflicts between economic activities (personal and family) and tasks that have in the membership structure. By the way of example, but not limited to, they determine conflicts of interest the following situations:

- Carry out functions of summit (managing director, counselor, function responsible) or have economic or financial interests by supplier, customers, contestants or commercial partners of IG;
- Use of own position in the Society or information obtained in the own work so that it is created a conflict between personal interests and Society interests;
- Conduction of working activities, by customers, suppliers, contestants who are in competition with IG;
- Approval or money offer, favors or utility from people or companies that are or want to begin a business relation with IG;

In the event that even only the appearance of a conflict of interest arises, every worker/collaborator has to inform its superior/representative and/or the Control Body on the Ethic Code.

Use and protection of assets of Society

Every worker/collaborator has to work with the perfect care and diligence in order to protect the assets of the Society, through responsible behaviors and in line with the operative procedure organized to regulated the use, documenting their purpose. Every worker/collaborator is responsible of the resources protection, which are given to him and he has the obligation to timely inform the appointed structures about eventually risks or damaging events for the Society or its assets.

In particular:

- Every worker/collaborator has to avoid improper uses which can cause undue costs, damages or reducing of efficiency or in contrast with the Society interest;
- Every worker/collaborator has to adopt what is expected by the internal politics and internal procedures, in order to not compromise the functionality, the protection and security of informatics systems, equipment and installation of the Society;
- Every worker/collaborator has to always work in the respect of security regulations, expected by the Law and internal procedures, in order to prevent possible damages to things, people and place;
- Every worker/collaborator has to use assets of the Society (every type and value), in the respect of the law and internal regulations with the care of "good father of the family";
- Every asset of the Society has to be used only for connected and instrumental aims to the exercise of working activity and it is forbidden, except for that is expected from the specific regulations, the use or the transfer of the assets by third parts or to third parts, even temporarily.
- Every worker/collaborator has to work, in the limit of possible, in order to reduce the risk of damages, thefts or other risks to assets and assigned or present resources, informing timely the appointed functions in case of abnormal situations.

Respect of regulations that are in the Ethic Code

Every worker/collaborator has to know the regulations contained in the Ethic Code and reference regulations that regulate the activity carried out in the field of its function, originating by the Law or procedures and internal rules. Every worker/collaborator has to accept explicitly his own obligations which descend from the Ethic Code, in the moment of establishment of work relationship or before the diffusion of the Code.

In particular, workers/collaborators have the obligation to:

- Abstain from behaviors opposite to the regulations contained in the Code;
- Speak to their supervisors, company representatives or the body appointed to the vigilance on the Ethic Code, in case of request of clarifications about the modalities of their application.
- Refer promptly to supervisors, company representatives or the body appointed to the vigilance on the Ethic Code, every news, directly detected or reported by others, regarding their possible violations and any request he has been made to violate them ;
- Collaborate with structures, which are assigned to verify possible violations;
- Correctly inform every third part, that are in contact with, in the field of work activity, about the existence of the Code and obligations and tasks imposed by it and external subjects;
- Require the respect of obligations that directly regard their activity;
- Adopt the suitable internal ventures and, if it is within their competence, external ventures in case of lacking compliance by third parts of the obligation to conform to the regulation of the Code.

5.4 Customers and Suppliers

The behavior style of the Society towards customers and suppliers, is based on the availability, respect and courtesy, in order to create a collaborative and high professional relationship. IG pursues its mission through the offer of quality services and in compliance with every regulation set up to protect the fair competition.

IG employees and collaborators are required to:

- Provide with efficiency, courtesy and promptness, within the limit of contractual provisions, high quality services, which satisfy the reasonable expectation and customer needs;
- Provide, when is necessary and in the forms and modalities expected by company politics, accurate and exhaustive information about Society products, so that the customer can take informed decisions;
- Be truthful in advertising or other communications;

Relationship with customers and suppliers – Choose of the supplier

The correct and clear relationship with customers and suppliers represents a relevant aspect of the Society success.

The selection of suppliers and the determination of purchase conditions, are made basing on objective standards like the quality, the convenience, the price, capacity and efficiency.

For IG are reference requirements:

- Interlocutor professionalism;
- Availability, appropriately documented, of means, including financial ones, organized structures, capacity and project resources, know-how, etc. ;
- The existence and effective implementation of quality, security and environmental systems.

In contracts, procurement and, in general, the supply of goods and services, IG:

- Adopts, in the supplier selection, the evaluation criteria expected by existing procedures, in the objective and clear way;
- Doesn't impede to anyone, who has the required requirements, the possibility to compete during the contracts stipulation, adopting in candidates choose, objective and documentable criteria;
- Ensures to every order/contract sufficient equal conditions: eventual exceptions have to be authorized and documented;
- Observes the expected contractual conditions;
- Maintains a frank and opened dialogue with suppliers, in line with good business practices.

Integrity and independence in relationship with customers and suppliers

In business relationships with customers and suppliers are forbidden donations, benefits, (both direct and indirect), gifts, courtesy acts and hospitality, unless they are of such a nature and value as not to compromise the image of the Company and cannot be interpreted as aimed at obtaining a favorable treatment that is not determined by market rules. In every case, eventual gifts, courtesy and hospitality acts have to be communicated and undergone to the decision of the supervisor Responsible. The worker who receives gifts or favor treatments by customers or suppliers that cross the ordinary courtesy relationships, has to immediately inform the supervisor, who will immediately give the news to the specific authority and/or to the competent company function, which after the suitable check, will take suitable measures. The stipulation of a contract with a supplier and the management of the relationship with him, are based on relationship of extreme clearness, avoiding, in the limit of possible, excess of mutual dependence.

In order to guarantee the extreme clearness and efficiency of the buying process, IG arranges:

- A suitable traceability of the choices made;
- The conservation of information, as well as official documents relating to the order and/or contract for periods established by the regulations in force.

Protection of ethics-environmental aspects in supplies

In order to conform the activity of procurement of goods and services with reference ethics-environmental principles, IG will be able to require, for particular supplies, social and/or environmental requirements (for example, the existence of an Environmental Management or SA8000 certification). For this purpose, in single contracts will be able to arrange specific clause.

5.5 Environment and security

IG considers the themes connected with the environment and safety very important. To this purpose, in the management of company activities, the Society, keeps in mind of the environmental safeguard and energetic efficiency, pursuing the improvement of security and safety conditions in workplaces. The technical research and innovation are based in particular to the promotion of products, activities and processes, as much as possible compatible with the environment, security and safety of operators. Workers/collaborators, in the field of their tasks, take part to the prevention process of risks, environ-

ment safeguard and protection of security and safety towards themselves, colleagues and third parts. In particular, IG, even through the active collaboration of its workers/collaborators:

- Promotes and implements every reasonable venture finalized to minimize risks and remove the causes which could put a risk the security and safety of people;
- Takes continuous attention and task to the improvement of its environmental performance, minimizing the negative impact on the environment and operating an informed and responsible use of natural resources;
- Values early the environmental impacts of all new activities and company processes;
- Cooperates with its own stakeholder , both internal (ex. Workers) and external (ex. Institutes), in order to optimize the management of profiles related to themes like Safety, Security and Environment;
- Maintains high standards of environment security and protection through the implementation of specific systems of management and monitoring.

5.6 Collectivity

IG is aware of its own activity effects on the reference contest, the economic and social development and the general wealth of the collectivity and it pays attention, in its work, to temper these interests. IG thinks that the dialogue with stakeholders is strategically important for a correct development of its own activity and it establishes, when it is possible, a fixed canal of dialogue with associations of representation of stakeholder, in order to cooperate in the respect of mutual interests.

Relation with politics and union organizations

IG abstains itself to give any contributions, direct or indirect, in any form, to factions, movements, committees and political and union organizations, to their delegates and contestants, except the due contributions based on specific provisions on the law.

Relation with not-for-profit realities

IG considers with favor and gives support to social and cultural ventures oriented to promotion of the person and the improvement of the life quality.

Relation with mass medias and diffusion of information

Relations with press, communications and information means and, more in general, external interlocutors, have to be kept only by subjects, expressly to this delegate, in compliance to procedures adopted by the Society. Communications to external, follow the guide principles of truth, accuracy, clearness, prudence and they want to support the knowledge of company politics and Society programs and projects. Relations with mass medias are based on this principle and are exclusively reserved to functions and responsibilities to this delegated. Workers/collaborators can't give information to the external, or make an effort to give them, without the authorization of competent functions. In any way or form, workers/collaborators can offer payments, gifts, or other advantages finalized to influence the professional activity of functions of mass medias, or can reasonably be interpreted as these.

5.7 Public Administration

Relations relating to the Society activity kept with public officials or appointed of public service (that work for the Public Administration, central and device, or legislative bodies, community instructions, international public organizations and any foreign State) , with judiciary, public authorities of vigilance

and other independent authorities, and also with private partners concessionaire of a public service, have to be kept and managed with absolute and rigorous respect of laws and norms in force, fixed principles in the Ethic Code and in internal register of 231/01 Model, in order not to compromise the integrity and the reputation of both parts. To this end, the assumption of tasks with Public Administrations and Public Institutions is exclusively reserved to appointed and authorized functions which realize them in the due respect of laws and principles of Ethic Code and in the complete observance of internal register in 231/01 Model. IG forbids, to their own workers, collaborators or delegates, and more in general, to all that work in their own interest, name or value, to accept, promise or offer, even indirectly, money, gifts, assets, services, performances or not due favors (even in terms of work opportunities) in relation to relationships kept with public officials, appointed of Public Service or workers, in general of Public Administration or other Public Institutions, or private subjects, in order to influence their decisions, in view of treatments more supporting or undue performances or for any other purposes. Every worker, collaborator or delegate of IG, who receives directly or indirectly requests or offers of money or favors of any type (ex. Gifts with not modest value) , formulated illegitimately to those, who work for IG in the contest of relationships with public functionary, appointed of public service or workers in general of Public Administration (Italian or other foreign countries) or other Public Institutions, or with private subjects (Italian or foreign), has to inform immediately the Vigilance Body and the competent internal function for the assumption of consequent measures.

Every relation with institutions of the State or international institutions is exclusively attributable to communication forms aimed to explicit the IG activity, answer requests or deeds of union inspective (interrogations, interpellation), or to keep famous the position of the Society about relevant themes. To this end, IG :

- Works, without any type of discrimination, through communication canals to this appointed with institutional interlocutors in a national and international level, community and territorial;
- Represents its own interests and positions in a clearness, rigorous and coherent way, avoiding attitudes of collusive nature;
- Avoids falsifications and/or alterations of audit reports or documental data in order to obtain an undue advantage or any other benefit for the Society and avoids destinations of public assets to different purposes from those for that they are obtained.

INTERNAL CONTROL SYSTEM AND ETHIC CODE REALIZATION WAYS

Internal control System

It is a politic of the Society, to spread on every level, a culture, characterized by the awareness of existence of controls and assumption of an attitude oriented to the control exercise. The attitude to controls has to be positive for the contribution that they give to the improvement of efficiency. With internal controls we intend all the instruments that are necessary or useful to address, manage and verify the activities of the company with the aim to ensure the respect of the law and procedures, protect Society assets and safety/security of people, manage efficiently the activities and give accounting and financial data that are accurate and complete. The system of internal control in its completeness has to reasonably consent :

- The respect of laws in force, procedures and Ethic Code.
- The respect of strategies and politics of the Society.
- The protection of material and immaterial assets of the Society.

- The efficacy and efficiency of the management.
- The reliability of financial, accounting and management information, internal and external.
- The efficacy of politics of social responsibility that are adopted.

The responsibility to realize an internal control system efficient, is common in every level of the organizational structure; consequently, every collaborator, in the field of the conducted functions, are responsible of the definition of the correct functioning of the control system.

Body of Control on Ethic Code

It is established a Control Body on the Ethic Code, which has the following obligations connected to the realization of Ethic Code :

- Monitoring the application of the Ethic Code by interested subjects, through the application of specific compliance programs, and welcoming eventual warnings gave by internal and external stakeholder ;
- Periodically relating to the Administration Council about the results of conducted activity, signaling eventual warnings of the Code that are of significant relevance;
- Express opinions about the revision of the most relevant politics and procedures, with the aim of guarantee the coherence with the Ethic Code;
- Provide, where it is necessary, to the proposal of periodic revision of the Ethic Code.

Communication and formation

The Ethic Code is brought to knowledge of all interested subjects, internal and external, through the specific communication activities. With aim of ensure the correct comprehension of the Ethic Code, the Administration function of the staff, prepares and realizes, even based on the eventual indication of the Control Body on the Code, a periodic plan of communication/formation that is aimed to support the knowledge of principles and ethic norms contained in the Code. The ventures of formation, can be differentiated according to the role and responsibility of collaborators.

Warning of interested subjects

The Society provides to establish communication canals through that the interested subjects will be able to inform about their own warnings for the Code or its eventual violations. Alternatively, all the interested subjects, can signalize, in a written and anonymous form, every violation or violation suspicion of the Ethic Code to the Control Body, which provides to a test of the warning, hearing eventually the responsible of the violation. The Control Body acts in such a way as to guarantee the informers against any type of retaliation, understood as an act that it can give open also to the only suspicion of being a form of discrimination or penalization. It is even ensured the privacy of the identity of the informers , without prejudice to legal obligations.

Ethic code violations

In case of verified violation of the Ethic Code, the Body of Control, informs about the warning and eventual advices, believed necessary to the Managing Director, and in more relevant cases, to the Administration Council. In case violations concern one or more members of the Administration Council or Managing Director, the Control Body will report warnings to the Administration Council, as a collegial body, and Board of Auditors. The competent functions, started by the bodies above, define the measures that are to be adopted according to the norms in force, they cure the actuation and report the result to the body appointed to the vigilance.

Guide lines of sanction system

The violation of fixed principles of Ethic Code and in the procedures, expected by internal registers of 231/01 Model, compromises the relationship based on trust between the Society and its own administrators, workers, consultants, collaborators with various titles, customers, suppliers, commercial and financial partners. These violations will be pursued by the Society incisively, promptly and immediately, through disciplinary measures provided by the 231/01 Model, in a correct and proportional way, independently from the possible criminal relevance of these behaviors and the establishment of a criminal proceedings in cases they are a crime. The effects of the violation of the Ethic Code and internal protocols of 231/01 Model, have to be taken into serious consideration by all those who any title have relations with IG: to this end, the Society provides to spread the Code of Ethic, internal protocols and to inform about expected sanctions in case of violation and about the methods of imposition.