

PROT: 02/2015

Gallarate, 23 November 2015-11-27

OBJECT: Company Ethical Code

Premise

This ethical code will be adopted by E.G.V.1 s.r.l. on indication of its unique administrator with effect 01/12/2015 and contains the enunciation of the general principles of legality, accuracy, clearness and moral integrity which represent an essential requirement for the development of E.G.V.1. s.r.l. activity and the reaching of the economicals, productive and social objectives the company has.

The ethical code in particular defines:

- The behavior rules in relations with external interlocutors, collaborators, market and surrounding, to which the society informs his internal and external activity, requiring the respect from all collaborators, consultants, and - to the extent applicabile – external interlocutors;
- The organisation and management rules of the business activity finalized for the realization of an efficient and effective programming, execution and control system of the activities as to ensure the constant respect of the behavior rules and to avoid the violation from any subject working for the company.

Spreading and updating

Is given a large internal spreading of the ethical code available for any interlocutor of the society.

Every society collaborator must know and respect the code predictions.

The company watches with attention the observation of the code, giving suitable information, prevention and control instruments, participating if necessary, with corrective actions.

This code can be modified and integrated by indication of the Sole Administrator.

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1. Relations with the external

1.1 Competition

The policy of E.G.V.1. s.r.l. is informed of free and loyal competition principles and all the actions in exercise of the business activity are headed to the obtaining of competitive results that pay capability, experience and efficiency. The society and his collaborators must maintain correct behaviors with affairs of business interest and with public administration relations. Any action directed to modify the correct conditions of competition is against the business politic of the company and it is forbidden to any subject which operates in account of it. In no case the persecution of the business interest can justify the behavior of the vertices or employees or collaborators of the company that would not be respectful of the laws effecting the rules of this code. In any communication with the external the information which concern the company and his activities must be truthful, clear and verifiable.

1.2 Relations with external interlocutors

The relations of the company with any external interlocutor, public or private, must be conducted according to the law and the respect of the fairness, clearness and verifiability. In particular the relationships with public employees must be accordant to the principles and previsions dectated by D.P.C.M. November 28, 2000 (Employees code of behavior of public administration). Presents or gifts which could appear excessive to the normal business or courtesy operations, or pointed to acquire favour treatments in the conduction of any activity are not admitted.

The research and instauration of personal favour, influence and interference relation suitable to conditionate, directly or indirectly, the result of the relation are forbidden; offers of goods or other utilities to representants, funcionaries or employees of public administrations, even with nominated person are also forbidden, except in the case of modest value and suitable to the uses but not to be intended as pointed to the research of undue favours.

The company does not deliver contributions , vantages or other utilities to politic parties or union organizations of the workers, neither to their representants, if not in respect of the appliable regulations in subject is always in agreement with the general principle of transparency.

1.3 Relations with clients and costumers

E.G.V.1. s.r.l. impresses his activity on the standard of quality, essentially intended as objective of the full satisfaction of the clients and other subjects to which the activity of the company is directed. In the relationships with clients and costumers, the company ensures fairness and clearness in the business negotiations and in the assumption of contractual obligations, as the loyal and diligent contractual accomplishment. All the behaviors, operations and transitions decided or implemented by the company and by the subjects acting in the name of it must be suitable to the law, to the professional integrity, the principles of transparency, consistency and congruety and duly authorized, documented and registered. The business negotiations and the relations with institutional and commercial interlocutors of the society must be conducted in accordance to the law and to the respect of fairness, transparency and verifiability principles.

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Participating or announcing tenders or in the ambit of commercial tradings of private negotiation the company carefully evaluates the congruity and execution of the requested performances, with particular attention to the technical and economical conditions, rapidly noticing, where possible, eventual anomalies. The formulation of the offers will be able to allow the respect of relevant qualitative standards, of congruous retributive levels of the employees and of the effective security measures. The company appeals to the contentious only when his legitimate claimings do not find in the interlocutor the owed satisfaction. In the conduction of any other trading situation, in which the subjects involved in the transactions could be or appear in conflict of interest, must always be avoided.

1.4 Relations with suppliers

The relationships with the suppliers of the company, comprehensive of the financial and advisory contracts, are regulated by the standards of this code and are subject of a constant and accurate monitoring from the company itself. The company makes use of suppliers, contractors or subcontractors that would operate – as far as it is possible to verify from itself – in accordance to the effective regulations and to the rules expected in this code.

1.5 Environment

The productive and commercial activities of the company are handled in the respect of the effective regulation in applicable environmental subject. When it promotes, projects or entrusts the projection of building works to third parties, the company performs the necessary investigations to verify the possible environmental risks deriving from the intervention to prevent damages.

2. Relations with collaborators

2.1 Work

The company recognizes the centrality of the human resources, principal factor of success of every business activity, in a framework of mutual loyalty and confidence between employer and employees. All the personal employed by the company is assumed with a regular working contract. The working relation is performed in respect of the collective contractual regulation from the sector and from the previdential, fiscal and insurant regulation. The company provides the continuous improvement of the professionalism of his employees, also through the performance of informative initiations. The company is committed, as far as its concrete possibilities, whereupon all the employees, directors, administrators, collaborators, as well as the personal and officials of other companies which activities would be performed with in common or between them coordinated – also temporarily – observed constant respect of the law and the effective regulation in all the countries where the company operates, as well as the organizational and procedural rules adopted, those particularly expected in the organization, management and control for the prevention of the commitment of a crime model.

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2.2 Health and security

The company guarantees work conditions respectful of the individual dignity and healthy and secure working environments, including movable and temporary yards, in full respect of the effective regulation in subject of prevention, injury at work and protection of the employees. The company performs his activity in technical, organizative and economical conditions as to ensure an accurate accidental prevention and a healthy and secure working environment.

The company is committed to spread and consolidate the consciousness of the risks by promoting responsible behaviors from all collaborators.

3. Execution mode

3.1 Prevention

In respect of the effective regulation and optics of pianification and management of business activities aimed to the efficiency, fairness, transparency and quality, the company adopts organizative and management measures suitable to prevent illicit behaviors or against the rules of this code from any subject that would act for itself. Because of the articulation of the activities and the organizative complexity the company adopts a delegation of powers and functions system, providing in explicit and specific terms the attribution of the tasks to persons with suitable capacity and competence. In relation to the extension of delegated powers, the company adopts models of organization and management which provide suitable measures to ensure the development of the activities in respect of the law and the rules of behavior of this code, as well as to find and rapidly eliminate possible situations of risk.

3.2 Controls

The company adopts specific modalities of control on the suitability of the behavior of anyone that acts for itself to the previsions of the effective regulation and the rules of behavior of this code.

3.3 Sanctions

The observance by the employees of the company of the regulations of the ethical code is to be considered an essential part of the contractual obligations under the sense of the article 2104 c.c. The violation of the regulations of the ethical code from the employees will constitute a failure to the primary obligations of the working relationship or illicit disciplinary, with any law consequence .

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