

Code of Ethics and Conduct

Approved by the Board of Directors of Rossi S.p.A.
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1. Introduction

In keeping with those values expressed by the Habasit Group, to which Rossi S.p.A. belongs, and together with the guidelines on conduct contained in the "Rossi Corporate Policy" document - which every company employee has a copy of - Rossi S.p.A. has decided to adopt a Code of Ethics, capable of mitigating risks of irregularities and of limiting the danger from the crimes envisaged by Italian Legislative Decree 231/2001.

The Code of Ethics (henceforth the "Code") is the official document autonomously adopted by Rossi S.p.A. (henceforth "Rossi" or the Company) , which formalises the principles defining the fundamental values that Rossi undertakes to respect and to have respected within the scope of the company's business and the rules of conduct that the Corporate Bodies and all Rossi's Employees and Collaborators must observe.

The Code, which aims to ensure a high ethical standard in the performance of the company's business, is also one of the tools used by the Company to ensure that breaches of the legal norms in force and applicable to the Company are adequately prevented, detected and countered.

Rossi is convinced that ethics in running a business are a condition for its success and, at the same time, a tool for promoting its image.

The Code also constitutes a reference point for all those who carry out business on Rossi's behalf and in its interest.

This Code is the first formal step towards Rossi's adoption of a New Organisation, Management and Control Model (henceforth "Model 231") defined to prevent the crimes envisaged in Italian Legislative Decree 231/2001 and Italian Legislative Decree 61/02 (henceforth jointly the "Decree").

The Code is one of the fundamental Protocols for establishing Model 231 and is an integral part of it, together with the system of sanctions (henceforth "Disciplinary Code") which the Company has decided to introduce in order to strengthen all the rules both envisaged by the Code, and provided for by the Decree and therefore by Model 231.

The Code is in accordance with the principles indicated by Confindustria (the Confederation of Industry) Guidelines, in the latest version of 31 March 2008.

The Code is also a guideline for all foreign companies controlled by Rossi.

2. Scope of application and Addressees

The principles and provisions of this Code are binding on:

- Members of Corporate Bodies (Directors, Statutory Auditors and Members of the Executive Committee);
- managers and employees (henceforth, Personnel), with no exception; (the Corporate Bodies, Personnel, Collaborators and Consultants are henceforth jointly called the "Addressees");
- all subjects that, even if external to the Company, operate directly or indirectly for the same (henceforth the "other Addressees").

In particular, observing the rules of the Code must be considered an essential part of the contractual obligations of Rossi's employees under the terms and for the purposes of Articles 2104 and following of the Italian Civil Code.

3. Structure of the Code of Ethics

The Code of Ethics is made up of four parts:

- The first indicates the ethical principles that guide corporate conduct and decisions.
- The second indicates the specific rules of conduct to follow with regard to subjects obliged to observe the Code.
- The third governs the methods of communicating, providing training on and monitoring the Code of Ethics.
- The fourth summarises the cases of criminal acts for which the Company could be held liable.

With a resolution by the Rossi Board of Directors, the Code may be amended or supplemented, also on the basis of the suggestions and indications provided by the Supervisory Bodies.

SECTION 1

Ethical principles of reference

The ethical principles listed below represent the fundamental values which all Addressees must comply with in performing their duties and in pursuing the corporate mission. Just being convinced of acting in Rossi's best interests does not justify behaving in contrast to the principles of the Code.

1.1. Respect for personal dignity

Rossi considers respect for the person as a priority. No conduct is permitted that has discriminatory content based on political opinion, trade union affiliation, religion, race, nationality, age, gender, sexual orientation, condition of health and, in general, any personal characteristic. Rossi guarantees personnel the same employment opportunities, ensuring non-discriminatory treatment based on criteria of merit.

1.2. Observance of the law

Rossi considers it essential that laws, regulations, customs and, in any case, of all current legal rules are observed absolutely.

1.3. Honesty

The Addressees, in performing their functions or duties, are obliged to fulfil the commitments made.

1.4. Correctness in commercial transactions

Every operation and/or transaction must be legitimate, authorised, fitting, congruous, documented, recorded and in all circumstances verifiable.

In carrying out its business relationships, Rossi is guided by the principles of legality, correctness, transparency and efficiency. No commercial or market logic can justify untrue information as an instrument for pursuing personal interests nor those of Rossi. In correspondence, in negotiations, in formulating contractual agreements, Rossi undertakes to make its intentions clear or to formulate its statements in a clear and comprehensible manner to the addressee.

1.5. Moral and physical integrity

Rossi protects its personnel and undertakes to ensure their physical and moral integrity, holding as unacceptable illegal or undue actions.

1.6. Correct management of accounts

The accounting records and documents must be based on precise and exhaustive information; they must reflect the nature of the operation to which they refer in compliance with external constraints (legal rules, accounting standards), and with internal policies, plans, regulations and procedures; they must also be accompanied by the relevant documentation and support needed to enable objective analysis and audits. Both internal and external auditors must have free access to the data, documents and information needed to perform their work.

Each Addressee must work in such a way as to prevent any form of illegal accounting, reporting immediately any anomalies to the Oversight Committee.

1.7. Fairness in relations with the competition

Rossi sustains the principle of the market economy and undertakes to practise fair competition and to observe all laws designed to protect competition and the market completely. No Addressee may be involved in initiatives or contracts with competitors which may appear to infringe regulations protecting competition and the market.

1.8. Safeguarding the environment

Within the scope of its business, Rossi believes that the environment is a primary asset and pursues the objective of protecting the safety and health of the Addressees, undertaking to observe current regulations on the subject of prevention.

1.9. Responsibility to the community

Rossi operates taking into account the needs of the communities in which it operates its business, contributing, where possible, to their economic, social and civil development.

1.10. Efficiency

In every working activity, economic management and corporate resource use must be pursued, in compliance with the most advanced quality standards.

Rossi also undertakes to:

- safeguard and maintain the corporate resources and goods, and manage its assets and capital adopting all the precautions needed to ensure full observance of the current laws and regulations;
- ensure an ongoing dialogue with the Swiss parent company Habasit Holding AG.

1.11. Spirit of service

Rossi adopts all the necessary initiatives so that the Addressees may orient their conduct, within the limits of their respective duties and responsibilities, in pursuance of the corporate mission with the aim of providing a service of high social value and usefulness.

1.12. Quality of relationships

In the area of relations with suppliers, customers and all third parties, Rossi operates with transparency, correctness and honesty.

1.13. Shareholder relations

Rossi safeguards the interests of its shareholders as a whole, with respect to the particular interests of individual shareholders.

Rossi asks its shareholders to accept the principles of the Code of Ethics completely and, in observing them, undertakes a duty of information on every action or decision that may have significant effects in relation to their investment, providing all forms of useful documentation in good time.

1.14. Personnel management

1.14.1. Relations with human resources

Rossi acknowledges the value of its human resources as a fundamental and essential factor for business development and for the growth of Rossi itself.

Honesty, loyalty, professionalism, seriousness, technical competence and dedication are therefore among the determining factors for achieving the company's objectives and represent the characteristics required by Rossi of its Directors, Statutory Auditors, Managers, Employees and Collaborators of various kinds.

Rossi undertakes to develop its personnel's skills and abilities so that, within the scope of the company's business, the energy and creativity of individuals may find full expression in realising their potential.

Rossi stresses its commitment to comply with the law on child labour, and to combat all forms of discrimination in the workplace including gender, nationality, religion, political views, trade union affiliation, personal opinions, and economic conditions.

Rossi undertakes to:

- create a working environment which guarantees every employee and collaborator, of any kind and level, conditions compatible with health, safety and personal dignity and in which an individual's characteristics cannot lead to discrimination or limitations. Personnel who believe they have suffered discrimination can report the event to the Human Resources Manager or to the oversight committee which will proceed to verify that the Code of Ethics has effectively been breached;
- safeguard the health of personnel, in compliance with the current legal rules, adopting all possible measures, necessary and appropriate to ensure the highest standards as regards safety and hygiene in the workplace;
- disseminate a culture of safety, protecting the health of personnel in the workplace;
- not establish any employment relationship with subjects involved in acts of terrorism.

1.14.2. Selecting personnel, establishing and managing the employment relationship

In full compliance with the legal and contractual provisions on the subject, Rossi undertakes to offer all its employees the same employment opportunities, ensuring that everyone may enjoy fair treatment, based exclusively on criteria of merit and competence, with no discrimination. Rossi undertakes not to favour forms of cronyism and nepotism. Personnel are employed only on the basis of regular employment contracts, as no form of irregular employment is tolerated.

1.14.3. Protecting privacy

Information and personal data are acquired, processed and conserved in accordance with specific procedures aimed at preventing unauthorised persons and/or entities from gaining access to them. These procedures are compliant with current legislation. In particular Rossi guarantees observance of the rules pursuant to Italian Legislative Decree No. 196 of 30 June 2003 (the so-called Privacy Code) and subsequent amendments and additions.

1.15. Relationships with customers

1.15.1. Impartiality and quality of information for customers

In supplying products and services to its customers, Rossi undertakes to act correctly and transparently, in accordance with current laws and regulations, and to meet these latter's needs, fulfilling its contractual obligations.

1.15.2. Transparency towards customers

With regard to contracts signed and communications with customers, Rossi undertakes to use clear and simple terms, so as to facilitate understanding on the part of the addressees, and clauses compliant with current legislation.

1.15.3. Relations with customers

With a view to ensuring correct and positive relationships with its customers, Rossi undertakes to manage any customer claim in a transparent and timely manner.

Rossi:

- in order to limit possible litigation with customers, undertakes to have recourse to the courts only when its legitimate claims are not duly met by the other party;
- undertakes to protect the privacy of its customers in full compliance with current legislation on the communication and dissemination of personal data.

1.16. Relationships with suppliers

1.16.1 Selecting suppliers

Suppliers are selected and the purchase terms determined on the basis of an objective assessment of the quality and price of the goods or service, and of the guarantees of safety, assistance and timeliness.

Rossi does not exclude for any supplier, in possession of the required requisites, the possibility of being asked to compete to be awarded an order by Rossi.

In any case, Rossi undertakes not to establish a commercial relationship with subjects, be they natural or legal persons, involved in acts of terrorism or that in any case are not able to ensure the absolute legitimacy of their work and compliance with the ethical principles of reference indicated in the Code.

1.16.2. Transparency and correctness in executing contracts

Rossi's personnel are obliged to observe the internal procedures for selecting and managing relationships with suppliers and external collaborators.

Rossi operates in order to establish a collaborative relationship of mutual satisfaction with its suppliers.

1.17. Relationships with institutions

Relationships concerning Rossi's and the Addressees' activities carried out with public officials or with persons responsible for public services, who operate on behalf of the central and peripheral Public Administration, or of legislative bodies, community institutions, international organisations and any foreign state, with the judiciary and with other independent authorities, must be maintained and managed in absolute compliance with current laws and regulations and with the Code, so as not to compromise their integrity and on the basis of the Code of Ethics.

No Addressee of the Code must make gifts (unless they are of insignificant value not exceeding normal commercial or courteous practices), promise or pay money, promise or grant goods in kind or other benefits to public officials on a personal basis for the purpose of promoting or favouring Rossi's interests, including after illicit pressure.

1.18. Relationships with associations, trade union organisations and political parties

Rossi does not finance associations nor sponsor events or conferences organised for the purpose of political propaganda. Rossi may make contributions and gifts to subjects with social, moral, scientific and cultural purposes, after scrupulous verification of the seriousness of the applicant.

1.19. Relationships with international operators

Rossi undertakes to ensure that all its relationships, including those of a commercial nature, with subjects operating at the international level, are carried out in full compliance with current laws and regulations. To this end, Rossi undertakes to adopt all necessary precautions to verify the reliability of these operators, and the legitimate origin of the capital and resources used by these latter within the scope of relationships carried out with Rossi. As far as is possible, moreover, Rossi undertakes to collaborate, correctly and transparently, with authorities, including foreign ones, which request information or carry out investigations on relations between Rossi and international operators.

1.20. Repudiation of all forms of terrorism

Rossi repudiates all forms of terrorism and does not establish any working or commercial relationship with subjects, be they natural or legal persons, involved in acts of terrorism. It also does not finance or in any way facilitate such activities.

1.21. Protecting the individual personality

Rossi acknowledges the need to protect individual and personal freedom and repudiates all actions which facilitate phenomena such as prostitution and/or child pornography.

1.22. Protecting transparency in commercial transactions

Rossi has as a principle maximum transparency in commercial transactions and prepares the most appropriate tools in order to counter the phenomenon of money-laundering, and receiving and investing illicit capital. Observance of the principles of correctness, transparency and good faith must be guaranteed in relationships with all contractual counterparties, even if they are part of the Rossi Group.

SECTION 2

Rules of conduct

2.1. Rules of conduct for members of Corporate Bodies

As well as observing the provisions of laws and by-laws, members of Corporate Bodies are obliged to observe the provisions of Model 231 and of the Code of Ethics which is an integral part of it. In particular, Corporate Bodies must:

- ensure conduct based on autonomy, independence and correctness in relationships both with public institutions, and with private subjects (including social creditors, economic associations, and national and international operators);
- ensure conduct based on integrity, loyalty and sense of responsibility in relations with Rossi;
- ensure assiduous and informed attendance at the meetings and activities of the Corporate Bodies;
- abstain from performing actions in situations of conflict of interest within the scope of their activity;
- facilitate control and/or auditing activities on the part of Shareholders, other Corporate Bodies, including the Oversight Committee and the independent auditing firm;
- make confidential use of information of which they become aware for reasons of office, not making use of their position to obtain personal advantages. Communications to the outside must comply with the law and safeguard information covered by industrial copyright;
- as far as is their duty and within the limits of their responsibilities, observe the rules of conduct laid down for personnel in paragraph 2.2. below.

2.2. Rules of conduct for Personnel

Personnel must observe current legislation and the principles identified by Model 231 and by the Code of Ethics.

Personnel must:

- a) avoid performing, causing or collaborating in the creation of conduct classifiable as any of the cases of crime referred to in Decree 231/01.

The crimes envisaged by the Decree are specified in SECTION 4.

This Decree introduces into Italian legislation a system of administrative liability (referable to criminal liability) of companies for certain crimes committed, in their interest or to their advantage, by:

- natural persons who hold positions of representation, administration or management of the companies themselves or of one of their organisational units;
- natural persons subject to the management or supervision of one of the subjects indicated above. These liabilities are in addition to that of the natural person who has actually committed the deed.

The liability provided for in the above decree also applies in relation to crimes committed abroad.

- b) collaborate with the oversight committee (henceforth "OC") during the auditing and supervisory activity that this performs, providing it with the information, data and news requested by it;
- c) make the communications to the OC provided for in Model 231;
- d) report to the OC any malfunctions or infringements of Model 231 and/or of the Code of Ethics.

Personnel may at any time contact the oversight committee, in writing, verbally and also by e-mail at the following address:
odv.rossi@rossi-group.com,

or at the following address:
Organo di Vigilanza Rossi (Rossi Oversight Committee)
Via Emilia 915/a
41123 Modena

in order to request clarifications and/or information on the subject of, for example:

- interpretation of the Code of Ethics and/or of other protocols related to Model 231;
- legitimacy of certain concrete behaviour or conduct, and its appropriateness or compliance with respect to Model 231 or the Code of Ethics;
- or to report any breaches and illegal actions they become aware of.

In addition to the provisions of a general character described above, personnel must also comply with the principles and rules of conduct indicated below.

In any case the OC will take action to ensure that people who have made reports are not subject to revenge, discrimination or, in any case, penalisation, thus ensuring the confidentiality of such subjects.

2.2.1. Correct use of computer systems

Within the limits of their functions and tasks, personnel are responsible for the security of the computer systems used and are obliged to comply with the current legislation and with the terms of the licence contracts.

Personnel are forbidden to load borrowed or unauthorised software onto the corporate systems, and it is also forbidden to make unauthorised copies of licensed programmes, for personal or corporate use or for third parties.

Subject to the provisions of civil and penal laws, personnel are also obliged not to send threatening and insulting e-mail messages, using improper language. In the same way, it is forbidden to activate information traffic on the corporate telecommunications network such as to reduce its efficiency significantly with a negative impact on Rossi's relational and productive capacity. Personnel may not surf websites with indecorous and offensive content, and must adopt the provisions of corporate security policies scrupulously, in order not to compromise the functions and protection of the computer systems.

Personnel must make the necessary commitment in order to prevent the possible commission of crimes through use of the computer systems.

2.2.2. Conflict of interests

In the performance of their activities and/or duties, the Addressees pursue Rossi's general objectives and interests, in compliance with current legislation and with the Code.

Rossi's Directors and employees must avoid and report conflicts of interest between their personal and their family's economic activity and the duties they perform within the company. Addressees must not use assets nor equipment, which are available to them in the performance of their function or duties, for their personal ends.

Rossi personnel may not operate a business in competition with that of the company and must observe the corporate rules and comply with the provisions of the Code, observance of which is also required under the terms and for the purposes of Art. 2104 of the Civil Code. Whenever they find themselves in a conflict of interest situation, even only a potential one, personnel must communicate this circumstance to the company's Human Resources Department, and abstain from carrying out any operation.

2.2.3. Relationships with representatives of the Public Administration

Addressees acting on Rossi's behalf in relations with Italian or foreign Public Administrations must act in accordance with criteria of transparency and fairness complying with current legislative provisions and with the Code. In any negotiations or relationship with the Public Administration it is explicitly forbidden for any Addressee to influence the counterparty's decisions improperly, for example by means of offers, promises, gifts of money or any other useful thing, for the purpose of promoting or favouring Rossi's interest, including after illicit pressure. In the same way, members of the Corporate Bodies and Rossi personnel may also not accept money, goods, gifts or in any case, useful things from representatives of the Public Administration. In any case, personnel must collaborate in the performance of control or auditing activities attributed to the appointed auditing bodies so that these subjects are provided with true, honest, complete and transparent information.

If the activity that entails contact with a representative of the Public Administration is demanded by an external consultant, the employee who has a relationship with the same must ensure, as regards his or her duties, compliance with the ethical principles indicated above.

2.2.4. Business relations

Addressees are not authorised to make use, for their own advantage or for the advantage of third parties, of business opportunities that could instead be seized in Rossi's favour.

2.2.5. Relationships with the competition

Personnel may accept invitations to certain events from Rossi's competitors provided that they are authorised in advance.

2.2.6. Relationships with suppliers

Personnel who contact suppliers, for reasons of their office, must base their conduct on the maximum transparency and correctness.

In particular, in no case may there be favouritism and the principles contained in the specific procedures must be observed.

It is forbidden for personnel to receive gifts or awards, and to accept benefits (either direct or indirect, in the form of a promise), presents, acts of courtesy or hospitality, unless they are of an insignificant amount and such as not to compromise Rossi's image and/or be interpreted as aimed at obtaining or ensuring unduly favourable treatment.

The rules of conduct indicated above are valid also in relation to any relationships maintained with international operators.

2.2.7 Relationships with customers

Personnel must maintain correct and transparent relations with customers. The primary aim of every employee/manager must be to satisfy customers completely. Gifts and awards, and accepting benefits (either direct or indirect, in the form of a promise), presents, and acts of courtesy or hospitality are forbidden, unless they are of an insignificant amount and such as not to compromise Rossi's image and/or be interpreted as aimed at obtaining or ensuring unduly favourable treatment.

Any gifts and/or benefits and/or useful things of any kind (with the exception of those of little value or insignificant amount) given by or to personnel and connected with relationships with customers must promptly be reported to the hierarchical superior or by this person to the Oversight Committee, or directly to the latter.

The rules of conduct indicated above are valid, and as such must be observed, also in relation to any relationships maintained with international operators.

2.2.8. Diligence in the use of Rossi's resources and assets

Personnel must protect and maintain Rossi's valuables and goods when entrusted to them, avoiding situations that can have an adverse effect on the integrity and security of Rossi's assets.

Abuse of personnel resources or of company property for purposes not connected to corporate activities is forbidden.

2.2.9. Diligence in performance of duties

Within the scope of their tasks and complying with the limits set by the current legislation, all employees must:

- increase by all means their skills and professionalism;
- contribute to the professional development of their collaborators;
- take decisions and assume risks according to the logic of healthy and prudent management, ensuring economic and efficient use of the resources in accordance with the law and the internal regulations, and correct use of the control procedures and system; in particular, when called upon to manage credit and business relationships in general, they must do so in accordance with the delegated powers received and safeguarding in any case the corporate assets;
- consider the corporate results as their own responsibility and reason for satisfaction;
- treat customer claims and/or reports aimed at suggesting improvements in procedures and services as opportunities for improvement.

2.2.10. Confidentiality

Personnel are forbidden to disclose confidential information or industrial secrets (for example financial data, corporate strategies, planned operations) to unauthorised third parties, including after termination of their respective employment contracts. Moreover it is forbidden to use, whether directly or indirectly, confidential corporate information to their own advantage or to the advantage of third parties, or to Rossi's disadvantage, including after termination of their respective employment contracts. Personnel must ensure that third parties are prevented from gaining any access to confidential information (protection against industrial espionage). Of great significance, in the area of the confidentiality principle, is the protection of personal data, that is any information relating to natural or legal persons, entities or associations, identified or identifiable, even indirectly, through reference to any other information, including a personal identification number.

2.2.11. Managing disputes and arbitration

Personnel responsible for managing in-court and out-of-court litigation, and managing arbitrations, must scrupulously observe the principles contained in the Code.

Relations with consultants and counterparties must be clear and based on principles of fairness and correctness. In no case is it admissible to adopt conduct non-compliant with these principles on the mistaken assumption that doing otherwise could procure an advantage for Rossi.

2.2.12. Managing environmental actions

Personnel performing duties in the area of environmental action management activities must comply with the following rules of conduct:

- check carefully the truthfulness and correctness of information provided in documentation prepared to obtain authorisations/licences;
- maintain a collaborative and proactive attitude in the event of personal contact with representatives of the Public Administration also in the case of inspections or audits;
- in accordance with the authorisation order/licence, always have a balanced, loyal, transparent and honest attitude in managing relationships with representatives of the Public Administration.

Personnel must not adopt conduct which is non-compliant with the principles identified in the Code, even if an advantage may result for Rossi.

2.2.13. Managing extraordinary operations

In the performance of extraordinary operations, Rossi bases its conduct on criteria of:

- a. maximum confidentiality of information relating to such operations; to this end the subjects involved must keep such information confidential and not abuse it;
- b. maximum transparency in relation to third parties with which Rossi maintains business relationships; to this end Rossi ensures all appropriate, timely and complete disclosure on the salient aspects of corporate operations. All communication activities must therefore observe the laws, rules and practices of professional conduct, and must be carried out with clarity, transparency and timeliness, safeguarding, among other things, sensitive information and industrial secrets.

2.2.14. Responsibilities in the area of internal controls

An internal control is a process, managed and carried out by Directors, Managers and other Rossi employees, defined in order to provide reasonable certainty as to achieving objectives, such as the effectiveness and efficiency of corporate operations, the truth of information and compliance with applicable laws and regulations. Every person who is part of the Rossi organisation is an integral part of its internal control system and has a duty to contribute to its correct operation, within the scope of the duties and activities performed.

Moreover, all Rossi's employees must report to their manager any shortcomings encountered in the control system or any negligent conduct or conduct in bad faith, of which they become aware.

2.2.15. Duties in the area of accounting books

Truthfulness, accuracy, completeness and clarity of information represent the necessary conditions that permit an activity of transparent accounting and constitute a fundamental value for Rossi, also in order to guarantee for shareholders and third parties the possibility of having a clear image of the economic and financial situation of the Company.

Personnel must reserve particular attention to the activity of preparing the financial statements and the other corporate documents.

To this end, it will be necessary to ensure:

- adequate collaboration with the corporate units responsible for corporate documents;
- completeness, clarity and accuracy of the data and information provided;
- observance of the standards for compiling accounting documents.

Anyone who becomes aware of possible omissions, falsifications, irregularities in bookkeeping and in obligatory documentation, or at least of the principles laid down by the Code and by the specific protocols must report them promptly to the Oversight Committee.

2.3. Rules of conduct for the other Addressees

Besides the members of the Corporate Bodies and personnel, the Code of Ethics applies to the other Addressees (as defined in the introduction), within the limits of their respective duties and responsibilities, as do the ethical principles of reference and the rules of conduct laid down for Rossi personnel.

The other Addressees must formally undertake to observe the Code of Ethics (as well as Model 231) and, in the absence of this express commitment, Rossi will not conclude and/or continue any relationship.

Rossi includes in the letters of appointment or contracts specific clauses that envisage, in the event of infringement of the Model 231 rules, specific sanctions, as provided for in the disciplinary system adopted by the company.

SECTION 3

Disseminating, implementing and controlling observance of the Code of Ethics

3.1 Disseminating and training on the Code of Ethics

Rossi undertakes to ensure punctual internal and external dissemination of the Code of Ethics through:

- distribution to all members of the Corporate Bodies and all personnel;
- posting it in a place accessible to all, making it available to other Addressees and to any other interested party.

The OC appointed by the company, in collaboration with the Human Resources Department, shall promote and monitor implementation of periodic training initiatives on the principles of the Code, planned in consideration of the need to differentiate the activities on the basis of the role and responsibilities of the resources involved, that is through planning more intense training characterised by deeper, more detailed study for subjects classifiable as “top management” pursuant to the decree, and for those operating in areas classifiable as “at risk” under the terms of Model 231.

Moreover, clauses and/or the signing of statements aimed at formalising the commitment to observe Model 231 will be introduced into contracts with other Addressees.

3.2. Controlling the Code of Ethics, monitoring methods

Implementation and observance of the Code must be monitored continually by the Oversight Committee which, in particular, must:

- verify observance of the Code of Ethics on the part of the Addressees;
- formulate its observations on the subject of the problems of an ethical nature which arise in the area of corporate decisions;
- provide, to the subjects involved that request them, clarifications and explanations on the interpretation of the Code or on the legitimacy of their own or others' conduct;
- stimulate and coordinate revisions of the Code, also through its own proposals for updates or revisions;
- promote and monitor development of the activities of communication and training on Model 231 and in particular, on the Code, determined by Rossi.

3.3. Breaches of the Code of Ethics and related sanctions

As regards breaches of the Code of Ethics, and the sanctions applicable, as also the proceedings of contesting the breaches and imposing sanctions, in accordance with the provisions of Italian Legislative Decree 231/2001 and suggested by the industrial associations, the company has prepared a specific disciplinary system (Disciplinary Code).

SECTION 4

Type of crimes

1. Crimes against the Public Administration (Arts 24 and 25 of Italian Legislative Decree 231/2001)
2. Corporate Crimes (Art. 25 ter of Italian Legislative Decree 231/2001)
3. Crimes committed in breach of laws on accident prevention and on the protection of health in the workplace (Art. 25 septies of Italian Legislative Decree 231/2001)
4. So-called transnational crimes (Art. 10 of Italian Law 146 of 16 March 2006)
5. Crimes of receiving, laundering and using money, goods or useful objects of illegal origin (Art. 25 octies of Italian Legislative Decree 231/2001)
6. Organised crimes (Art. 24 ter of Italian Legislative Decree 231/2001)
7. Crimes for the purpose of terrorism or subversion of the democratic order (Art. 25 quater of Italian Legislative Decree 231/2001)
8. Computer crimes and illegal data processing, Art. 24. bis of Italian Legislative Decree 231/2001)
9. Crimes in the area of forged money, credit cards and revenue stamps (Art. 25 bis of Italian Legislative Decree 231/2001)
10. Crimes against the individual personality (Art. 25 quinquies of Italian Legislative Decree 231/2001)
11. Crimes against industry and commerce (Art. 25 bis-1 of Italian Legislative Decree 231/2001)
12. Crimes in the area of breach of copyright (Art. 25 novies of Italian Legislative Decree 231/2001)
13. Crimes of abandonment of solid waste on and in the ground (Art. 192, paragraph 4 of Italian Legislative Decree 152/2006)
14. Crimes of inducement to not make statements or to make false statements to the judicial authorities (Art. 25 novies of Italian Legislative Decree 231/2001)

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