

CODE OF ETHICS

In F.A.I.-F.T.C. we commit to integrity, respect, reliability and sustainability. In our Company, building a culture and a brand that is based on these principles is everybody's responsibility.

We respect human rights and environment in our business activities.

We do not tolerate any form of discrimination based on gender identity, race, religion, age, sexual orientation, disability, nationality, political opinion, union affiliation, social background and ethnic origin.

We comply with the laws of the Countries where we conduct business and internationally recognized standards to promote social and environmental responsibility, such as the Universal Declaration of Human Rights and the Declaration of Fundamental Principles and Rights at Work of the International Labour Organization (ILO).

We value fair employment conditions and a healthy and safe working place and we respect all applicable laws and regulations regarding working hours and employee compensation.

F.A.I.-F.T.C. has adopted a Supplier Code of Conduct wherein we ask our suppliers to comply to standards equivalent to those set forth in this Code. Adherence to the terms of the F.A.I.-F.T.C. Supplier Code or equivalent forms the basis of our business relationship with our suppliers.

This Code is divided into the following sections:

- Fair Working Conditions;
- Health & Safety;
- Environmental Responsibility and Sustainability;
- Ethical Principles.

FAIR WORKING CONDITIONS

F.A.I.-F.T.C. ensures fair working conditions in conformity with laws and internationally applicable standards such as Universal Declaration of Human Rights and the Declaration of Fundamental Principles and Rights at Work of the International Labour Organization (ILO).

F.A.I.-F.T.C. is thus committed:

- to provide a safe working environment, that ensures dignity and equal opportunities, that is free from any form of harassment, discrimination, or exploitation, in compliance with the regulations;
- to assure training, development and enhancement of the skills and talents of employees and partners, thus promoting their personal and professional growth;
- to recognise the rights of freedom of association and collective bargaining and to abide by all applicable laws and regulations regarding working hours and employee compensation;
- to not engage in or benefit from any form of forced or involuntary labour nor any form of child and under age labour;
- to require and expect that employees and third parties behave in full loyalty, correctness, and integrity, according to their position in the organization.

We ask our suppliers and third parties to comply to standards equivalent to those above mentioned.

HEALTH & SAFETY

F.A.I.-F.T.C. is committed to a culture of safety within its organization, as well as in its supply chain. The Company carries out its business in compliance with the regulations governing the health and safety of employees.

F.A.I.-F.T.C., in order to minimize the risk of exposure to health hazards, is thus committed:

- to comply with the legislation on safety and hygiene in the workplace;
- to regularly train and inform employees, third parties and contractors working in our facilities regarding safety and emergency management;
- to implement regular and frequent maintenance of facilities, in conformity to regulations and best practices;
- to operate in full compliance with environmental regulations, endeavouring to avoid or reduce waste or emissions resulting from our business activities;
- to not tolerate any conduct aimed at discouraging or preventing workers from reporting cases of accidents.

We ask our suppliers and third parties to comply to standards equivalent to those above mentioned.

ENVIRONMENTAL RESPONSIBILITY AND SUSTAINABILITY

We, at F.A.I.-F.T.C., believe that our personal commitment to environmental responsibility must be at the core of our choices and actions and we are committed to achieving the highest standards of sustainability.

We manage our operations and factories in a responsible manner with a view to fulfilling the environmental requirements defined by applicable laws and regulations.

We take responsibility for managing, measuring and minimizing the environmental impact of our facilities, products and projects.

F.A.I.-F.T.C. is thus committed:

- to abide by environmental regulations and to carefully manage any potentially hazardous material used in the production cycle;
- to have all the environmental authorizations required by law;
- to reduce energy consumption, waste or emissions resulting from our business activities and to dispose of waste in a legal and responsible manner;
- to contain emissions (air and water) by monitoring them and ensuring compliance with the limits imposed by industry standards and regulations;
- to report any environmental accident;
- to pay the utmost attention to the supply of raw materials, especially to materials that may come from areas affected by conflicts and / or characterized by social instability. FAI-FTC does not directly purchase minerals and metals from those Countries and verifies that this procedure is followed within its supply chain.

We ask our suppliers and third parties to comply to standards equivalent to those above mentioned.

BUSINESS ETHICS

We are committed to conducting our business with integrity and in compliance with legal requirements by adhering to applicable laws and international standards of business ethics.

F.A.I.-F.T.C. is thus committed:

- to abide by all applicable laws and regulations in the countries where we conduct business;
- to not engage in or tolerate any form of corruption, bribery, extortion, or embezzlement;
- to comply with antitrust and fair competition and to avoid conflicts of interests;
- to protect our intellectual property rights by appropriate restricted disclosure, confidentiality and licensing arrangements and other measures; to respect intellectual property rights of third parties in the same manner;
- to collect, process and retain personal data of our employees and business partners in a way that is consistent with data privacy and protection laws and regulations and only for legitimate business purposes;
- to manage all company's assets with care and to protect them against loss, theft, damage, or misuse, with specific efforts to reduce environmental impact;
- to promote social and economic development;
- to guarantee the accuracy of its books and records, providing appropriate internal control standards in order to maintain the confidence of our shareholders and authorities that our company's books and records are correct and complete and reflect the state of our assets in a transparent manner.
- to keep confidentiality towards those who report irregular or unethical situations and to defend them from any form of retaliation.

Anyone who becomes aware of a violation of this Code is invited to report this violation to the Guarantor in order to ensure the correct application of the principles contained in the Code of Ethics.

The compliance officer (the Guarantor) who is in charge to ensure that the aims and principles of the Code of Ethics are followed is Ms. Patrizia Garavaglia.

The Guarantor:

- ensures the distribution of the Code of Ethics to employees and third parties and in general to all the Company stakeholders
- keeps up-to-date the Code of Ethics on its effectiveness, on changes in business and on regulation codes;
- receives reports on violations of the Code of Ethics, coordinates their assessments and involves, if necessary, the related functions of the Company.
- reports to the Board of Directors and draws up reports, periodically or whenever it is deemed fit.

This code is approved and released by the Executive Board and is available on the Company website.

To report to the compliance officer, please write to compliance@fai-ftc.it