



ETHICAL & ENVIRONMENTAL CODE

GENERAL PRINCIPLES **2**

WORK PRINCIPLES **3**

<i>General principles</i>	3
<i>Gifts and bonus</i>	3
<i>Special rules</i>	3
<i>Safe and healthy working conditions</i>	4
<i>Salary and working time</i>	4
<i>Right of association</i>	4
<i>Prohibition of discrimination</i>	4
<i>Prohibition of child labour</i>	5
<i>Prohibition of hard labour</i>	5
<i>Prohibition of disciplinary sanction</i>	5

ENVIRONMENTAL VALUE **6**

<i>General principles</i>	6
<i>Consciousness and training</i>	6
<i>Infrasstructures and operations</i>	7
<i>Use of energy and water</i>	7
<i>Emissions and effluents</i>	7
<i>Waste Recycling</i>	7
<i>Precautionary approach</i>	7
<i>Suppliers and other partners</i>	7

APPLICAZIONE E CONFORMITÀ **8**

<i>General principles</i>	8
<i>Supervision, evaluation and compliance,</i>	8
<i>Regular updates</i>	9

GENERAL PRINCIPLES



All Companies of **GATTO GROUP** adopt a fair work ethic, our ethical code ensure that the best work practices are followed to guarantee the fundamental human rights.

All the people working in the Group, indiscriminately and without any exception are committed to the observance of these principles, while also assuring that they are being observed within their roles and responsibilities.

In no way any actions in contrast to these principles are to be justified, even if aimed for the Company's benefit.

All the Stakeholders of the Group (Shareholders, Managers, Employees, Partners...) commit to a sustainable business model. All companies within the Group act according to a 'spirit of trust' towards the principals of an ethical Business.

Thus they recognize that commercial secrecy, intellectual property, truth, veracity, transparency and reliability contribute to stable and long lasting business relationships.

WORK PRINCIPLE



All companies within the GATTO GROUP act according to a 'spirit of trust' towards the principals of an ethical Business. Thus they recognize that commercial secrecy, intellectual property, truth, veracity, transparency and reliability contribute to stable and long lasting business relationships.

GIFTS AND BONUS

GATTO GROUP and all its branches do not offer in any form, to people inside other structures, incentives bribes or other forms of payment that could compromise fair and impartial business decisions.

SPECIAL RULES

GATTO GROUP and all its branches guarantee that all productions, supplies and related activities, involving attainment of legal permits, will only commence once the permits are granted.

SAFE AND HEALTHY WORKING CONDITIONS

GATTO GROUP and all its branches provide a safe and healthy working environment for its employees, in accordance with the local laws and codes in force in the industries in which they operate.

SALARY AND WORKING TIME

GATTO GROUP and all its branches abide by local laws for minimum wage, working time and employees' indemnity.

Overtime is voluntary and fully paid according to normal or increased rates , following local and legal requirements.

As an exception, it might be requested to employees to work overtime for a certain limited period. In this case, the additional working hours and following working days will be in conformity with the local regulations and planned to guarantee safe and fair working conditions.

RIGHT OF ASSOCIATION

GATTO GROUP and all its branches do not prevent their employees from taking part in legal and pacific associations of workers, or labor unions. Whereas local working laws should limit this freedom, employees are encouraged to join in other similar associations.

PROHIBITION OF DISCRIMINATION

GATTO GROUP is a multi-cultural organization and does not discriminate any employee or any applicant for employment because of race, social position, nationality, religion, sex, sexual orientation, age, political orientation or labor union associations.

PROHIBITION OF CHILD LABOUR

GATTO GROUP and all its branches do not employ anyone under 16 years of age or of a lower age than what is accepted in the country for termination of compulsory education, should it be higher than 16 years.

GATTO GROUP and all its branches adhere to all local laws intended for young workers, especially those related to working hours, salary, health, safety and to general working conditions. For young worker we intend every worker under 18 and over 16 years of age.

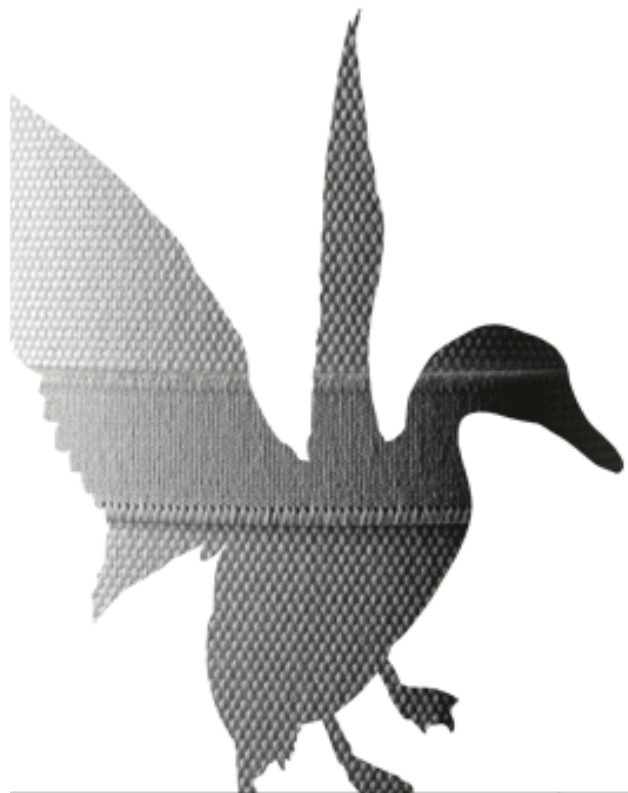
PROHIBITION OF HARD LABOUR

GATTO GROUP and all its branches do not make use of any form of forced or compulsory labor. Forced labor is any work or service which people are forced to do against their will or it is imposed under penalty of sanction if refused, and each sort of work which is not accepted in a free state of mind.

PROHIBITION OF DISCIPLINARY SANCTIONS

GATTO GROUP and all its branches do not tolerate any type of harassment, physical punishment and violence threatening, as well as all forms of financial penalties, mental and physical abuse, coercion nor intimidations.

ENVIRONMENTAL VALUE



GATTO GROUP and all its branches commit to act as responsible citizen while conducting its business activities, respecting the environment and promoting sustainable use of natural resources.

The nature of products and service does not indicate a direct involvement of the Group in areas with strong environmental impact.

The principles illustrated in this document confirm the commitment of GATTO GROUP to act in conformity with the national and international environmental laws.

GATTO GROUP and all its branches therefore demand that all their employees contribute to supporting the environment by implementing the following principles.

CONSCIOUSNESS AND TRAINING

In compliance with the principles of this document, GATTO GROUP and all its branches will communicate their environmental policy to all employees, suppliers and partners of all projects and activities in which GATTO GROUP is a buyer or seller.

INFRASTRUCTURES AND OPERATIONS

GATTO GROUP and all its branches manage their industrial activities with the aim to minimize the negative impacts of such activities on the environment.

GATTO GROUP and all its branches will do their best to guarantee that the construction, conversion and renovation of their plants, will be in compliance with the local environmental laws, and respecting environmental harmony and surroundings.

USE OF ENERGY AND WATER

GATTO GROUP and all its branches control the use of water, energy, oil, natural resources and other materials used in its operations, in order to optimize their usage and reduce their waste. This includes heating, lighting, ventilation and air conditioning. The Logistics department apply an «efficient use of energy» strategy, through an accurate planning and arrangement of shipments.

EMISSIONS AND EFFLUENTS

The factories guarantee a strict observance of the environmental laws and industrial regulations related to pollution, by installing adequate retention and filtering systems.

WASTE RECYCLING

GATTO GROUP and all its branches adopt a waste sorting process, with specific regulation on dangerous materials. Whenever possible, the materials are properly recycled.

PRECAUTIONARY APPROACH

GATTO GROUP and all its branches periodically update their design and production tools and processes, as well as the use of products and services, in order to reduce the impact of such processes on health, safety, or on the environment.

The purpose is to introduce in the market products which follow the safety standards of the European Regulations.

GATTO GROUP and all its companies have developed and constantly update emergency plan and risk analysis, cooperating with the local competent authorities.

SUPPLIERS AND OTHER PARTNERS

GATTO GROUP and all branches encourage their suppliers to adhere to the principles stated in this Code of Environmental Ethics and promote improvements in their procedures, where possible, in order to be more aligned with the procedures of the Group.

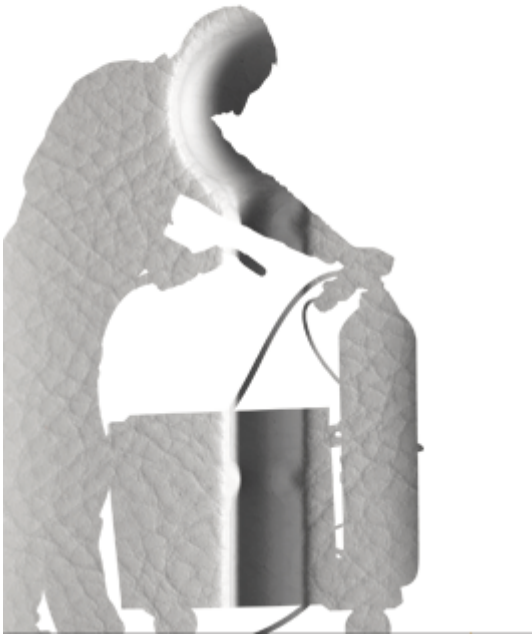
Any potential concern or improvement proposal must be directly reported to Management.

IMPLEMENTATION AND COMPLIANCE

GATTO GROUP and all its branches require that all parties share the principles of the "Ethical Code" to their employees, subcontractors and any other third party, in order to guarantee the observance of "the code" in all operations.

SUPERVISION, EVALUATION AND COMPLIANCE

GATTO GROUP plants are regularly inspected to monitor their performances.
All non conformities must be promptly reported together with the corrective action plan.
Any compliancy issue can be anonymously reported to : compliancy@gatto.it.
The Management matter will evaluate the matter and enforce a corrective action.



REGULAR UPDATES

This Ethics & Environmental code is periodically updated, edited and reviewed by the Group management in order to meet the continuous demands made by an ethical and responsible environmental management whenever a problem emerges.



GATTO ASTUCCI SpA

www.gatto.it

PO 06.03 REV. 0 – 01/09/15