

Corporate Code of Ethics

Adopted pursuant to Legislative Decree 231 of 2001

Approved by the Board of Directors on 04.09.2015



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1. Company presentation

Silcart was established in 1962 and since then has specialized in the design and manufacture of undertile waterproofing sheeting materials and flexible supports for insulating panels.

Presently, under the leadership of Giovanni and Ugo Faotto, the company has consolidated its leadership in the domestic market and has undertaken its international expansion with a strong presence in foreign markets through the affirmation of its brand.

In 1962, Silcart began producing the first bitumen cardboard sheets for construction to become a leader in the industry in the '80s.

Since 1990, the Company started the production of undertile bituminous sheeting and panel supports for thermal insulation industries, also investing in the production of synthetic undertile sheeting as a response to the increasing needs of the global market.

Today, the Company continues investing in research and development with the aim to manufacture materials having an increasingly innovative and technological content and contribute to the evolution of modern architecture.

Today, Silcart is a reality with an international vocation, exporting about 80% of its production to Europe, South Africa, Japan, Australia and New Zealand.

Product development has always been the Company's leitmotiv and key success factor, essential for its permanence on the market.

Silcart products comply with European standards and the specifications issued by main certificating bodies, such as BBA, CSTB, DUKO, IAB, Sintef Byggforsk NBI, SP, ZVDH, only to mention a few.

Flexible and extremely prompt in responding to the ever-changing needs of its customers for advanced techniques, Silcart has always devoted substantial resources to research and development, even bringing forth important partnerships with some of the major Italian universities, including those of Udine, Venice, Padua, Milan, Perugia as well as national and international research institutes such as the Fraunhofer Institute.

The constant focus on research on raw materials, on the development of products and a continuous improvement in quality inspired Silcart to set up an internal laboratory for quality control in production. The lab is active 24 hours a day, along with a specific laboratory for research and development equipped with all the instruments prescribed by the international standards for material and product analyses.

2. Introduction and Company's formal statement

An ethical behaviour that is respectful of the laws and values of the people and culture with which the organisation has chosen to entertain trading and social relations must be for all Silcart employees and associates a strategic choice and a formal commitment.

Compliance with rules, in fact, reduces entrepreneurial risks and improves performance and corporate reputation, whilst creating value for all those involved in the company business.

To this end, Silcart has decided to adopt a corporate code of ethics that is in line with the principles of loyalty and honesty in the behaviour already shared within the Company and designed to regulate the Company activities through behavioural norms, also setting general principles to which the entire corporate structure will comply.

This Code is a comprehensive document in order to optimize its application even in small structures, where the relations among different players, including suppliers, are crucial to the quality of work.

The Code includes four main sections, and namely:

- Objectives and rules under which the Code was compiled and updated,
- Behavioural rules on how to behave during everyday activities,
- Procedures for reporting violations,
- Internal penalties and operational procedures.

Given the prescriptive nature of this document, the verb “*must*” is used throughout the text.

This Code applies as of the date of its approval by the Board of Directors. On such date, a procedure for the information and training of all subjects involved was also defined.

This document may be integrated with specific rules and regulations that are to be considered complementary to the rules of conduct described below, which however can in no way be waived.

This code must be understood as an instrument designed to prevent possible crimes and therefore, as applicable in accordance with Legislative Decree 231 of 2001.

A copy of this Code shall be made available to all employees of the Company and brought to the attention of customers, suppliers and anyone requesting it. Each revision or variation of this Code will be shared with the Company Board of Directors and later communicated to all the staff members and organisations concerned.

3. Scope of application of the Corporate Code of Ethics

The Corporate Code of Ethics was drafted to provide values and clear rules as well as guidance for those working for and collaborating with Silcart.

The Corporate Code of Ethics represents a concrete commitment for the respect of the needs of all stakeholders and its primary purpose is to prevent the commission of wrongful acts or crimes. This Code was prepared as a tool for improvement and for the prevention of possible crimes and improper conduct.

The Code was requested and approved by the Board of Directors. It is reviewed periodically and integrated with the operating procedures for managing specific activities, as it may be necessary.

The Board of Directors is responsible for the effective application of the Code and its availability to the subjects involved.

The members of the Board of Directors, executives and senior managers must set an example in the application and dissemination of the Code, therefore sanctions against them should always be the most severe.

The Board of Directors supervises the Code and is involved in any possible issue that may arise from its application or interpretation. The Board is also responsible for any information about the Code, given both inside and outside the organisation.

Any waiver granted to any employee must be subsequently granted to anyone else, without any discrimination whatsoever, in a transparent and documented fashion.

All staff members, collaborators and suppliers must accept this Code.

In no way must this Code violate the fundamental rights of workers.

4. Our goals

1. High quality of products and technological innovation,
2. Being a true, reliable, long-term partner,
3. Respecting people and the environment.

These objectives are managed through a set of basic tools, chief among them the application of systems of managing quality and environmental aspects, according to the international standards of good practice ISO 9001, ISO 14001 and OHSAS 18001.

The integration of systems allows for more accurate monitoring of production processes, in compliance with environmental regulations.

5. General principles

Compliance with standards

As part of professional activity, the Company's employees and consultants are required to fully comply with the applicable laws as well as with this Code and the protocols and procedures adopted by the Company.

Transparency in external communication

All forms of communication must be oriented to meeting the information needs of all stakeholders, and must be truthful, accurate, not misleading and oriented to the principle of caution and respect of the values of the community.

Enhancement of investment and human resources

The Company acts with the aim of safeguarding and enhancing its own value and as well as that of the investment made by its shareholders.

With regard to the enhancement of human resources, the Company's employees and consultants are a key factor for its success. For this reason, the Company protects and promotes training of human resources in order to improve and enhance the experience and wealth of knowledge of each employee and collaborator.

The Company is committed to protecting the physical and moral integrity of its employees and collaborators, ensuring that their working conditions respect personal dignity and taking good care of the safety and health of the workplace. Individual rights and diversity must always be respected, avoiding all form of discrimination.

All investigation on ideas, preferences, personal tastes, and in general on the privacy of employees and collaborators is prohibited.

All behaviour that might disturb personal sensitivity must be avoided.

In no way, links with persons or groups who pursue terrorist purposes are allowed.

As for the work environment, all safety laws in the workplace must be implemented with the aim of preventing risks, accidents or occupational

disease. Any possible issue that may arise should be promptly corrected and its recurrence prevented with the aim of improving the levels of risk.

6. Commitment

Conflicts of interest

In conducting any activity of interest for the Company, all situation where the parties involved are in conflict of interest must be avoided.

It is believed to be a conflict of interest when an employee, a collaborator or a director pursues an objective other than that pursued by the Company, or he or she voluntarily procures or attempts to procure or provide a third party personal benefit in connection with the performance of the activities carried out in the interest of the company.

No employee should ever take advantage from any situation and event related to the Company.

Confidential information and copyright protection

Any information sensitive or potentially related to commercial activity or to aspects of personal life should be always considered as confidential and never be disclosed in any way, even after termination of the employment period or contract, if not required by law.

It is reminded that the privacy of employees or collaborators is protected by adopting all suitable protection measures for the processing and storage of the information required under current legislation.

The Company's employees and consultants must conform their behaviour to strict confidentiality even outside working hours, in order to safeguard the technical, legal and administrative expertise and concerning staff management and sales activities.

Everyone who, as a result of carrying out their duties relating to management, control and service possess information of confidential and significant nature must not in any way abuse of their privilege.

Even with a positive approach to the dissemination of knowledge, the rules on intellectual property and patent protection must be respected, particularly in connection with software and creative works.

Relations with the market

Commercial activity must be always based on the respect of the operators on the market, as well as on a spirit of mutual respect with competitors.

Communications and Silcart customer contracts must be clear and simple and making use of a language that is as close as possible to that normally used by the partners, in compliance with standards and in no way related to elusive or improper practices. They must also be complete and not overlook any material issues may be important in the customer's decision.

The style of behaviour of Silcart staff with customers must be inspired by a spirit of availability, respect and courtesy, in a collaborative and highly professional way of relating.

Lobbying must be transparent, readily identifiable and linked to the protection of the values of this Code.

Relations with Public Administration

The behaviour with the officers of the public services must be respectful of their code of ethics, which all staff is committed to know. Under no circumstances should it give the impression that activities are related to exchanges of favours or similar behaviours. This principle also applies to political parties, representatives or other entities pursuing collective aims.

No Silcart employee must give money or offer any financial or other type of benefits to representatives of the Public Administration, in order to obtain assignments or other benefits, neither personal nor corporate.

In conducting operations and entertaining relationships with the Public Administration, maximum transparency and traceability of significant information must be ensured.

Specific care must be observed in any transactions regarding authorisations, concessions, licences, or any requests for funding from public sources (regional, national or EU).

In the event Company needs the professional services of employees of Public Administration, as consultants, all regulations in force must be complied with.

Sponsorships, presents, gifts and benefits

Any event organized, promoted or sponsored must always have a predominant dimension of professional or social purpose. This principle should also be applied to the events of social life or of development for the Company, such as conventions or technical activities.

In order to allow for transparency, such events must always be recorded in detail.

It is forbidden to give or in any or form promise presents, gifts or grant benefits to people entertaining commercial or entrepreneurial relations with the Company, except in cases where such forms of presents, gifts or benefits are of modest value and within the ordinary habits.

However, each employee or collaborator of the Company must seek express authorization from the management prior to offering presents, gifts or benefits that exceed a modest value.

It is forbidden to the Company's directors, auditors, employees or collaborators to receive presents, gifts or benefits from entities operating with the Company in dealings related to the activities of the Company itself.

This principle also applies to forms such as donations in cash or kind, sponsorships, invitations or benefits of any kind. Any waiver, including those for countries having different cultural situations, must be expressly approved by the management.

Use of corporate assets

Each working tool provided by the Company should in no way be used for purposes contrary to the objectives of this Code or for personal gain.

Selection of suppliers and partners

In choosing their suppliers, the Company operates with the aim of achieving the maximum competitive advantage by adopting a non-discriminatory behaviour. Suppliers must always be selected and evaluated according to objective and verifiable criteria, with reference to the specific nature of the services to be provided.

In choosing its suppliers, the Company must operate in full compliance with current regulations. Purchasing activities must be conducted based on clear contracts and the most economically favourable performance possible. Records must be kept to prove this activity.

Relationships between employees and collaborators

Professional relationships should always be characterised by cooperation and transparency, in order to improve the quality of work and that of the working environment. All possible forms of violation of human rights and associations thereof must be avoided.

Staff members are hired under employment contracts, as prescribed by law and by collective negotiation legislation. No working position is tolerated to be irregular or illegal.

Before the commencement of the employment relationship, the employee shall receive adequate information about the related regulatory and remuneration norms, as the assignment is based on their substantial knowledge. The Company chooses to avoid any form of discrimination against its employees or collaborators.

Public funds

They must be used always and exclusively for the purpose for which they were granted. Funded activities of significant value must be subject to specific accounting and destination audit to be carried out by qualified independent professionals.

7. Penalty system

The measures and penalties for any violation or infringement of the provisions of this Code shall be sanctioned in accordance with the provisions of labour law to the most severe degree, according to the contractual obligations and the contractual provisions in force.

For further details, please refer to the document: **Disciplinary System**.

8. Reports

The entire staff and any other affected person may report the management or the supervisory bodies provided, even anonymously, any risk of violation of this Code. These must manage the report promptly and do everything that is in their hands to solve the problem, including appealing to public authorities. No action or discrimination must be conducted with respect to the person who reported the violation, even should it unfounded (principle of good faith). The highest level of confidentiality must be guaranteed to the staff members involved.

Reports can also be sent to a dedicated service at **odv231@silcartcorp.com**