

CODE OF ETHICS
ATTACHED TO THE ORGANISATION
MANAGEMENT AND CONTROL MODEL
OF GRANITIFIANDRE S.P.A.
in accordance with Legislative Decree no. 231 of 8th June 2001
and subsequent amendments and integrations
GRANITIFIANDRE S.p.A.
Registered office in Castellarano (RE) - Via Radici Nord 112
Share capital Euro 18,431.339 = fully paid up
Registered with the Business Register of Reggio Emilia
Fiscal Code: 03 056 540 374
Company subject to direction and coordination of Iris Due S.p.A.
Drawing up date Revision Date Revision Number
21/03/2008 13/11/2008 1

Organisation, Management and Control Model
Special Part A - Code of Ethics

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1. Preamble

1.1 Contents

The GranitiFiandre S.p.a. Code of Ethics:

- enunciates the set of rights, duties and liabilities of the Company for all the parties with whom it comes into contact for reaching its corporate purpose (customers, suppliers, employees and/or collaborators, partners, institutions); it is therefore a directive whose rules of conduct

must be considered in everyday work and it implies,

first of all, compliance with the laws and regulations in force, including internal ones;

- proposes to set the ethical reference "standards" and the behavioural regulations towards which the Company decision making processes and conduct must be oriented;

- requires that the management and all the parties to which it is addressed display coherent behaviour, i.e. actions

which are not, even only in spirit, discordant with the company's ethical principles;

- contributes to implementing the Group's social Responsibility policy, being aware that consideration for social and environmental issues contributes to minimising exposure to compliance and reputation-related risks, reinforcing a sense of belonging in its interlocutors.

2. Application modes

2.1 Adoption and updating

The present Code adopted by the resolution of the Company Board of Directors on 21st March 2008, far from being considered a non-modifiable document, must be seen as a tool susceptible to subsequent amendments and integrations according to the internal and external changes to the Company, as well as the experience acquired by the Company over time. The above aims to ensure full coherence between the guiding values, which are the Company's fundamental principles, and the behaviour to be displayed in compliance with the present Code.

The GranitiFiandre S.p.a. Code of Ethics is based on the guideline by Confindustria (Italian Employees' Federation) for drawing up

Organisation, Management and Control Models as per Legislative Decree 231/2001, updated on 31st March 2008 and is inspired by the ANCE guidelines for drawing up

Organisation, Management and Control Models as per Legislative Decree 231/2001, updated in August 2008 as well as by the Associazione Bancaria Italiana guidelines for the adoption of Organisational Models on the banks' administrative liability (Legislative Decree no. 231/2001), updated in February 2004.

2.2 Addressees

The present Code of Ethics is binding for partners, corporate body members, senior management, employees, including directors, as well as all people who, despite being external to the Company, act, directly or indirectly for the latter.

All the above-mentioned Addressees must therefore observe and, within their area of responsibility, make sure that the principles of the Code of Ethics are observed by others. Under no circumstances does the claim

of acting in the interest of the Company justify the display of behaviour in contrast with that enunciated in the present document.

The observance of the Code regulations must, furthermore, be considered an essential part of the contractual obligations for the Company employees in accordance with and as a consequence of art. 2104 and subsequent of the Civil Code.

2.3 General principles

The Company organisation and management model complies with the prescriptions contained in the present Code of Ethics which forms an integral part thereof. On this point, in fact:

- the Code of Ethics is voluntarily adopted by the Company and expresses the values and behavioural principles acknowledged as its own which all the addressees are called upon to observe as they constitute the first instrument for preventing any offence;

- the Organisation and Management Model pursuant to Legislative Decree 231/01, inspired by the principles of the

Code of Ethics, complies with specific legal prescriptions in order to prevent the perpetration of particular types of offences.

The Company works towards continuous improvement in operations and internal procedures in order to make the company management more effective, also encouraging, among other things, the use of IT tools, so as to reduce the repetitive and merely executory tasks in favour of more professional ones, guaranteeing timeliness and punctuality in meeting the requests from customers and collaborators, while respecting the regulations; through this the company is exclusively pursuing corporate interests and the interests of its partners.

The Holding Company requests that none of the subsidiaries display behaviour or make jeopardising decisions for the integrity and reputation of the Group. With respect to the autonomy of the subsidiaries, the Holding Company requests that the latter include in their Code of Ethics the same values expressed by the Code of Ethics of the Holding Company, making their behaviour conform to these, in observance of the laws and regulations in force.

All the company Directors or anyone employed within the Group is bound to carry out the duties attributed to him/her with loyalty and fairness, to facilitate communication between the companies in the Group, to

encourage and use intra-group synergies cooperating in the interest of common objectives.

The circulation of information within the Group, particularly with the purpose of drawing up the consolidated financial statements and other communications, must be made in accordance with the principles of truth, loyalty, fairness, completion, clarity, transparency and prudence, with respect for the autonomy of each company and its specific business scope.

2.4 Training activities

The Human Resource Department will provide to include within the annual training plan initiatives aimed at promoting the understanding of the values and behavioural regulations mentioned in the present Code of Ethics.

For the new recruits, a training programme is provided on the contents of the Code of Ethics as part of the induction courses.

3. General principles

3.1 Values

The actions, operations, transactions and in general all behaviour displayed by the Addressees, in exercising their functions and responsibilities must comply with the values of maximum integrity, honesty, fairness, loyalty, transparency, equity, impartiality as well as respect for people and responsibility in the wise use of company, environmental and social property and resources. Said values and behaviour must be translated into concrete actions.

Every person, within the duties relative to the role covered, must provide the highest possible level of professionalism in order to satisfy the needs of the customers and internal users in a suitable manner.

Every person shall carry out the duties assigned to him/her with commitment, contributing in a concrete way to reaching the company objectives and respect for the mentioned values.

The development of a sense of belonging to the Company and the improvement of the company image are common objectives that constantly motivate everyone's behaviour.

3.2 Integrity, honesty, fairness and loyalty

The observance of the values of integrity, honesty, fairness and loyalty implies, furthermore, the Company being committed to:

- promoting and demanding the observance of the internal regulations and/or all the laws by the personnel, collaborators, customers, suppliers and any other third party with which it has a legal relationship;
- strict observance of the money laundering regulations in force, being committed to refuse to carry out any operation whose fairness and transparency is suspect;

- promoting at all levels measures to prevent any local and international corruption phenomena;
- guaranteeing and promoting within the company the observance of all the organisational and legislative regulations of the Organisation and Management Model drawn up in order to prevent any offence pursuant to Legislative Decree 231/01;
- recording every operation and transaction only when it is supported by suitable documentation, in order to be able to perform inspections at any time to certify its characteristics and purposes and identify the person who authorised, performed, recorded and verified the operation itself; consequently, employees and/or collaborators must make all accounting records accurately, promptly and fully, strictly respecting civil law and fiscal legislation as well as the internal accounting procedures. Each record must reflect exactly the data contained in the supporting documentation, which must be carefully stored for any possible future inspections. The reliability of management records and accurate and timely recording, which make it possible to reconstruct the overall company situation, represent one of the objectives constantly pursued by the Company.

3.3 Equity, impartiality and protection of individuals

The Company sees the protection of people's safety, freedom and individual personality as an essential value. Therefore, it renounces any activity which could lead to damage to individual safety, such as the practice of female genital mutilations and any possible form of financing which could facilitate or encourage the exercise of said practices, as well as any possible exploitation or reduction to a state of subjection of people. Furthermore, the Company condemns any behaviour aimed at the illegal entrance of a foreigner into the territory of the Italian State, or into any other State of which the person is not a citizen or where he/she has

no right to permanent residence, in order to gain a profit, also indirectly.

The Company also assigns primary importance to the protection of minors and the repression of exploitation of any nature carried out against minors.

For this purpose, it is therefore forbidden and completely foreign to the Company to make any incorrect use of IT tools and, particularly, any use of the latter aimed at creating or even just facilitating possible conduct concerning the offence of child pornography, also in the form of virtual images.

Furthermore, in order to guarantee full respect for people, the Company is committed to respecting and ensuring

its employees, suppliers, collaborators and partners respect the legislation in force concerning labour protection, with particular attention to child labour.

Any employee who, carrying out his work duties, becomes aware of any offence or behaviour which could facilitate any damage of personal safety as identified above, as well as constituting exploitation or reduction to a state of subjection of the person, must give immediate notice to his line manager and to the Vigilance Institution, notwithstanding legal obligations.

Furthermore, respect for the values of equity and impartiality imply that the Company is committed to:

- refraining from any form of discrimination, particularly when associated with race, nationality, sex, age, physical disabilities, sexual orientation, political or union opinions, philosophical ideas or religious beliefs;
- not tolerating sexual harassment and physical or psychological vexation, in whatever form or context they may occur;
- listening to requests from colleagues, customers and suppliers without preconceived ideas or behaviour aimed exclusively at the defence of its own position and work;
- promoting the freedom to disagree and overcome hierarchical and bureaucratic conditioning;
- refraining from, while carrying out its duties, making decisions or performing activities that are contrary to or in conflict with the interests of the company or not compatible with the observance of the official duties;

- demonstrating sensitivity and respect towards others abstaining from any behaviour which could be considered offensive;
- condemning any behaviour destined to promote pornography, especially child pornography;
- condemning any behaviour aimed at facilitating illegal immigration, illegal circulation of drugs and psychotropic substances and tobacco smuggling.

3.4 Transparency and confidentiality

The observance of the principle of transparency and confidentiality implies the Company being committed to:

- circulating true, complete, transparent and comprehensible information, so as to allow the addressees to make conscious decisions with regard to relationships to be maintained with the Group itself or in which the latter is involved;
- updating, circulating and enforcing the Company's policy regarding the management, treatment and communication to the public of confidential and inside information, the observance of which is enforced for the addressees;
- protecting the confidentiality of data and information which the employee and/or collaborator of the Company may come into contact with, particularly when such data and information can affect, if made public, the price of securities to be listed for negotiation in Regulated Markets. In this sense, the observance not only of laws, but also of corporate regulations and internal Company procedures concerning so-called "market abuse" is of great importance. The members of the boards of directors and auditors, employees and Collaborators must be fully aware of the fact that it is forbidden to carry out any buying or selling operation or other operations, even through a third party, or to suggest such operations, exploiting information received due to the role they cover.

More generally, all addressees of the present Code of Ethics must refrain from behaviour which could exercise or facilitate "insider trading" phenomena.

- considering confidentiality as the cornerstone of company activity, which is crucial for the Company's reputation and the trust that the clientele places in the Company. Employees and/or collaborators must strictly observe this principle, even after the termination of the employment or collaboration relationship, however it takes place. It is therefore expressly forbidden to communicate, circulate or make improper use of data, information or confidential news concerning the clientele or third parties in general, with which the Company has, or is about to have, a business relationship. Personal data can be made known only to anyone who effectively need to know it for the exercise of their specific responsibilities. Any party who has a relationship with the Company must refrain from abusive communication or circulation of such data and/or information.

Therefore, it is forbidden:

- in financial statements, reports or other company communications envisaged by the law, addressed to partners or the public, to expose material facts that do not correspond to the truth although being subject to evaluation or to omit information whose communication is envisaged by the law on the economic, asset or financial situation of the Company or the Group (even if the information relates to the assets possessed or administered by the Company on behalf of third parties), in such a way as to mislead the addressees on the aforementioned situation, potentially causing financial damage to the partners or creditors, with the aim of deceiving partners or the public and obtaining for his/herself or for others an undue profit;
- in reports or other communications, being aware of the falseness and intention to deceive the addressees of communications, to state a lie or to hide information regarding the economic, asset and financial situation of the Company or the Group, so as to mislead the addressees of communications on the aforementioned situation, in order to obtain for his/herself or for others an undue profit;
- to hide documents or, with other suitable devices, to prevent or hinder the exercise of the inspection or audit legally attributed to partners and/or to other company bodies;
- to divide profits or advance payments on profits not effectively generated or destined by law for reserves, or to divide reserves, even not constituting profits, which cannot by law be

distributed;

- aside from the cases envisaged by law, to buy or subscribe to company shares or stakes, provoking damage to the endowment or reserve fund which cannot be distributed by law;
- violating legal provisions regarding creditor protection, to make reductions to the share capital, causing damage to creditors;
- to fictitiously form or increase, even partially, the capital of the Company;
- to cause damage to creditors by dividing the company assets among partners before paying the creditors of the company or before allocating the sums required to pay them off;
- to use simulated or fraudulent actions to obtain the majority at meetings, with the aim of obtaining for his/herself or for others an undue profit;
- to circulate false news, or to use simulated operations or other concrete devices so as to cause a substantial alteration to the price of financial instruments.

Should the Addressees become aware of any omissions, falsifications or negligence in the accounting documentation

or the documentation on which the account records are based, they must inform the Vigilance Institution to that effect.

3.5 Responsibility

Observance of the value of responsibility implies that the Company's business is carried out:

- being inspired by the principles of sound and prudent management, with the aim of being a solid, reliable, transparent Company, open to innovations and an interpreter of the constantly changing requirements of customers,

attentive to shareholders' and partners' needs, interested in further development and use of the human resources and with a more efficient internal organisation;

- pursuing the company's interests in observance of the laws and regulations and with fair and loyal behaviour, seeing competitors as a positive incentive for constant improvement in the quality of the products and services offered to the clientele, basing its commercial behaviour on the principles of loyalty and fairness;
- protecting the reputation and assets of the company;
- aiming for compatibility between economic initiatives and environmental needs, not only in observance of the regulations in force, but also considering the most important experience in this field;
- supporting social and economic growth in the areas where the Company is located, also with cultural and sport initiatives and support for disadvantaged categories.

3.6 Management of relationships in relation to culpable offences regarding safety in the workplace

The company must clearly explain and make clear the essential principles and criteria on which decisions of any type and level are made,

concerning the protection of health and safety at work through a formal document.

Such principles and criteria can be identified as follows:

- preventing risks;
- evaluating risks which cannot be prevented;
- fighting the risks at source;
- adapting the work to the individual, particularly with regard to planning the layout of the work environment and the choice of work equipment and work and production methods, especially to minimise monotonous and repetitive work and to reduce the effects of the latter on health;
- taking into consideration technical evolution;
- replacing dangers with things that are not dangerous or that are less dangerous;
- developing a coherent overall prevention policy which integrates technique, work organisation, working conditions, social relationships and the influence of the working environment;
- giving collective protection measures priority over individual protection measures;
- giving appropriate instructions to the workers.

Such principles are used by the Company to take the necessary measures for the safety and health protection

of the workers, including prevention against professional, information and training risks, as well as the preparation of an organisation and the necessary equipment. The Company, including both the Management and the operators, must observe such principles, in particular when decisions or choices have to be made and later when they must be applied.

4. Code of Conduct

4.1 Relationships with personnel

The Company, recognizing the personnel as an essential and fundamental element for company development, considers it important to establish and maintain relationships with employees and collaborators based on mutual trust.

The Company is, therefore, committed to developing the skills and potential of the personnel in the implementation of their skills, so that the abilities and legitimate aspirations of the individuals may be fully achieved while reaching the company objectives.

For these purposes, it must be inspired by the efficiency of all the Company structures and in particular of the human resources department.

The Company is committed to offering equal work opportunities and professional growth to all its employees based on their skills and professional qualifications, without discrimination, or any form of nepotism or favouritism. Therefore, the Company insists that in all internal and external working relationships no harassments of any kind occur, such as for example the creation of a working environment that is hostile to individuals or groups, the unjustified interference with other people's work or the creation of obstacles and impediments to others' professional prospects.

In particular, upon being hired, the evaluation of the candidates is performed based on their correspondence with the profiles required by the Company, also verifying the professional and aptitude characteristics that can be usefully developed with the company organisation. The Personnel is solely hired with legal working contracts, no form of illegal work being tolerated. The candidate must be informed of all the characteristics regarding the working relationship.

Upon the establishment of the working relationship, the personnel must receive clear and specific information on the regulatory and salary-related aspects. Furthermore, for the entire duration of the working relationship, the employee or collaborator receives indications that allow him/her to understand the nature of his/her role and that allow him/her to carry it out properly, with respect for his/her qualification. Communication to all employees is based on and continues to be implemented according to the values of listening, clarity, transparency and cooperation.

The Company is committed to properly training all its employees and to facilitating their participation in training courses or programs so that the abilities and legitimate aspirations of the individuals may be achieved while reaching the company objectives.

It follows that:

- the Company, through the corporate departments, selects, hires, pays and manages the personnel based on meritocratic and competence criteria, without any form of political, union, religious, racial, language or sexual discrimination in observance of the laws, employment contracts, regulations and directives in force;
- the company assessment system is managed transparently and impartially. It must take into consideration the observance by the personnel of the regulations in the present Code, which is a prerequisite for the application of the incentive and career progression systems envisaged in the contractual legislation for reinforcing motivation, awarding benefits with equity and facilitating the achievement of excellent results.

The protection of the moral and physical integrity of employees is a necessary condition for carrying out the work activities. Therefore, the Company is committed to guaranteeing the protection of the health and safety of its employees and collaborators and it is further committed to consolidating and

circulating its safety culture, developing awareness of the risks and promoting responsible behaviour on the part of all the personnel.

The Company is committed to observing and ensuring its suppliers observe the regulations in force regarding work, with particular attention to child labour and women's work.

4.2 Obligations of the personnel

The professionalism and commitment of the personnel represent a specific obligation as binding preconditions for the achievement of the Company objectives. The employees and collaborators cannot be exempted from the observance of the present Code of Ethics.

In particular, they are committed to complying diligently and loyally with the following behavioural rules:

- any situation or personal activity which could lead to a conflict of interest, even potentially, with the company or which may interfere with the ability to make impartial decisions in the interest of the Company must be avoided;
- the personnel cannot accept, even indirectly, money, gifts, goods, services, or favours relative to relationships with any third party with which the Company has a relationship in order to influence decisions, receive more favourable treatments, or undue services or for any other aim;
- any requests or offers of money, gifts, favours of any kind, received by the Personnel, must be promptly communicated to the relevant line manager and to the Vigilance Institution according to the previous point;
- information acquired during the assigned activities must remain strictly confidential and must be appropriately protected in observance of Legislative Decree no. 196 of 30/06/2003, and cannot be used, communicated or divulged to third parties;
- it is necessary to take care of one's own skills and professionalism, enriching them with experience and collaboration with colleagues creating, in this way, an atmosphere where all the colleagues feel welcome and motivated to achieve their own professional objectives;
- the activity of each employee and collaborator of the operative, management and commercial network structures, must be inspired by maximum collaboration in order to obtain customer satisfaction;
- the decisions made must be based on the principles of sound and prudent management, through a wise evaluation of the potential risks, being aware that one's own choices contribute to the achievement of positive company results;
- each individual must work with diligence in order to protect the company assets, scrupulously and responsibly using the resources assigned to him/her, avoiding any improper use which could cause damage or reduction of efficiency, or in contrast with the Company's interests;
- the activity of drawing up the financial statements or other similar documents must be based on maximum collaboration, completeness and clarity of the information supplied, as well as the accuracy of the data and documents, by those who are responsible for this task;
- it is necessary to cooperate with the Judicial Authority for any inquiries and legal proceedings performed by the latter.

4.3 Relationships with union and political organisations

The principles of transparency, independence and integrity must also characterise the relationships entertained by the corporate departments with political and union organisations. The relationships with the latter aim to promote fair communication, without any discrimination or difference in treatment, in order to facilitate a climate of mutual trust and a solid dialogue in the search for highly flexible solutions.

Relationships with representatives of political and union organisations are reserved for the relevant authorised departments in the Group.

The participation of the Addressees of the Code of Ethics, on their own behalf, in political organisations, takes place outside working hours and without any connection to the role covered within the Company. The Company does not support events or initiatives which have a solely political aim;

furthermore, it abstains from any direct or indirect pressure towards political exponents and does not allow the assignment of direct or indirect contributions, in money, nature or any other form to political parties, movements, committees or political and union organisations, or to their representatives or associations with which a conflict of interests can be envisaged.

4.4 Behaviour of Company Bodies

The Company bodies, aware of their own responsibility, as well the observance of the law, the regulations in force and the articles of association, must observe the prescriptions and the principles in the present Code of Ethics. In particular, their components are required:

- to display behaviour inspired by autonomy, independence and fairness towards public institutions, private parties, economic associations, political forces, as well as any other national and international party;
- to display behaviour inspired by integrity, loyalty and a sense of responsibility;
- to guarantee constant and informed participation in the meetings and activities of the corporate bodies;
- to evaluate the situations where there is a conflict of interests or incompatibility of departments, roles or positions inside and outside the Company, abstaining from any actions in situations of conflicts of interests within their own activity;
- to make confidential use of the information they are aware of for official reasons, avoid making use of their position to obtain direct and indirect personal benefits;
- to respect the requests for information from the Board of Auditors regarding the application of specific regulations to the Company;
- to present at meetings only deeds and documents which are true, complete and unaltered, concerning a particular agenda;
- not to acquire or subscribe company stakes or reserves which cannot be distributed by law;
- not to carry out reductions to the share capital, mergers with other companies or spin-offs, which could cause damage to creditors;

4.5 Relationships with customers and suppliers

The Company demonstrates constant sensitivity and attention to the quality of its relationships with the clientele and to its continuous improvement, the latter being a required prerequisite for the process of creation and distribution of the company value. The Customers are, in fact, an integral part of the Company assets.

In relationships with customers, each Addressee of the present Code of Ethics represents the Company, of which he/she is an

integral part. Accordingly, the Addressees must carry out their activity with the Customers with professionalism, competence, willingness, courtesy and transparency.

The excellence of the products and services offered and the guarantee of giving an immediate and qualified answer to their requests are the characteristic elements in relationships between the Company and the clientele.

Behaviour must always be marked by professional respect for the confidentiality of the information acquired during the working activities, as well as the regulations in force regarding the protection of personal data.

In order to protect the image and reputation of the Company, built up through the commitment, devotion and professionalism of its structures, it is fundamental that relationships with the clientele are based on:

- complete transparency and fairness, also with the aim of creating a solid relationship which helps the customer understand the characteristics and value of all the available products and services, bought or offered to him/her;
- maintenance of high quality standards of the services and the optimisation of customer satisfaction; The internal procedures and IT technologies used support these aims also through continuous monitoring of the clientele itself;
- the accurate identification of the risk profile of customers, which is a fundamental starting point for offering products suitable for their needs;
- timely feedback to complaints, aiming towards a substantial resolution of controversies. Complaints constitute an opportunity for improvement, for overcoming

conflicts and regaining the trust and satisfaction of customers;

- care and attention to each Customer or category of Customers, without any discrimination for their nationality, religion or gender;
- the elaboration of a price policy in line with the quality of the service offered;
- the commitment to making their centres or services accessible to the disabled, eliminating any architectural feature that deny access to the disabled;
- the observance of the law, with particular reference to the provisions regarding money laundering, as well as the battle against the handling of stolen goods and the use of money, goods or utilities of illicit origin;
- the independence from all improper conditioning, both internally and externally;
- the regular monitoring of the achievement of the satisfaction and loyalty objectives for the customers, which is awarded with the aim of circulating the culture of the relationship. The Company is open to customers' suggestions and proposals regarding the services and products.

Furthermore, when initiating commercial relationships with new customers and managing the existing ones, given the information available, it is necessary to prevent the following:

- entertaining direct and indirect relationships with parties whose implication in illegal activities is known or even only suspected, in particular when they are connected to arms and drug trafficking, money laundering and terrorism, and with people who do not have the necessary commercial reputability and reliability requirements;
- financing activities aimed at the production or marketing of highly polluting or dangerous products for the environment and health;
- entertaining financial relationships with economic activities which, even indirectly, hinder human development and contribute to violating fundamental human rights (for example, exploiting child labour).

The principles applied to the relationships with customers must characterise the commercial relationships of the Company with its suppliers with whom it is committed to developing relationships based on fairness and transparency. In particular, the Company guarantees:

- standard methods for the selection and management of suppliers, ensuring equal dignity and opportunities for them. In the Supplier selection process, objective and transparent assessments will be taken into account

regarding their professionalism and entrepreneurial structure, quality, price, delivery and service methods. Their reputation on the market,

their ability to manage confidentiality obligations, required by the service offered, as well as their social responsibility criteria, compatibility and suitability to

the size and needs of the Company will also be taken into account;

- criteria and systems for constant monitoring of the quality of performance and goods/services provided;
- supply agreements based on equity, especially with reference to the terms of payment and cost of the administrative obligations.

The adherence to the above-indicated principles is guaranteed through the adoption and respect for internal procedures regarding purchasing and supplier selection.

The suppliers are encouraged to carry out their business following conduct standards which are coherent with those indicated in the Code. In particular, they must guarantee conscientious business, observe the rights of their workers, invest in quality and responsibly manage the environmental and social impacts.

4.6 Relationships with shareholders

It is a priority of the Company to improve the investment of its shareholders with an industrial policy which guarantees an adequate economic return over time, through the optimisation of the resources available as well as an increase in competitiveness and financial solidity.

In the observance of its own fundamental values, the Company, in order to build continuous and durable relationships, guarantees its shareholders:

- timely and transparent communication of the status of implementation of the strategies and results of the Company with the aim of supplying clear, complete and accurate information;

- equity of information, as described in the previous point, and the best and constant attention to all partners without discrimination or preferential behaviour;
- the largest participation of the shareholders in the Meetings, promoting awareness among them in exercising their right to vote.

4.7 Relationships with Public Administration

The Company identifies and defines the communication channels with all interlocutors of the Public Administration (solely by way of example, Ministries, Italian Authority on Fair Competition, Communication Regulatory Authority, Authority for the Protection of Personal Data, Revenue Office...) on a local, national and international level.

In particular, the undertaking of commitments with the Public Administration (hereinafter referred to also as PA) is reserved for the corporate departments who are responsible and authorised to do so, who must accomplish their tasks with integrity, independence and fairness. The relationships are also marked by maximum collaboration, avoiding, in any case, hindering the institutional activity and are carried out, maintaining in the relationships with the authorities, the right amount of mutual independence, avoiding any action or attitude which may be interpreted as an attempt to improperly influence decisions.

With reference to the relationships with the PA, it is forbidden for the Addressees to promise or offer to Public Officials or employees of a Public Service, or to employees in general of the Public Administration gifts (not only in the form of money, but also goods), benefits or other utilities in order to promote or favour the interests of the Company upon the undertaking of commitments and/or management of relationships of any nature with the Public Administration (for example, in the event of drawing up and issuing contracts, adjudication and management of authorisations, inspection and control activities or in the context of legal proceedings...). In particular, it is forbidden to:

- offer to the above-mentioned subjects, also on holiday occasions, gifts with the exception of symbolic presents directly attributable to normal relationships of commercial courtesy and such that they cannot create in the other party or an outsider and impartial person the impression that they are aimed towards acquiring from the Company or granting to the Company undue advantages, such that they could generate the impression of illegality or immorality;
- instrumentally examine or propose employment opportunities for the employees of the Public Administration (or to relatives and extended family) and/or commercial opportunities of any kind which might undeservedly advantage them, outside the ordinary treatment of the clientele;
- make unjustified entertainment expenses or not envisaged by the contract, with different purposes from the sole promotion of the company image;
- supply or promise to supply, ask for or obtain confidential information and/or documents or that could compromise the integrity or the reputation of one or both parties;
- facilitate, in the purchasing process, suppliers and sub-suppliers only because they are indicated by the Public Administration employees as a condition for the subsequent development of the activities;
- consciously exhibit false documents or containing false or altered data, remove or omit documents, omit due information, in order to unduly direct in one's own favour or a customer's favour the decisions of the Public Administration;
- have deceptive conduct which could mislead the Public Administration in the technical/economic evaluation of the products and services offered/supplied, or which could unduly influence the decision of the Public Administration;
- use or present false declarations or documents stating false information or omitting required information, in order to unduly obtain contributions, funding, loans at preferential rates or other contributions of the same kind from the State, the European Union or other public institutions.

The Addressees must verify that public disbursements, contributions or funding at preferential rates granted in favour of the Company are used for the implementation of the activities or the realisation of the initiatives for which they were granted; any different use from that for which they were granted

is forbidden.

In the implementation both of periodic communications and notifications and relationships of a specific nature, the Company guarantees the completeness and integrity of the information supplied and the impartiality of assessments, seeking to be prompt with the fulfillments required of it.

Anyone who receives explicit or implicit requests or offers of benefits of any nature from Public Officials or Employees of a Public Service must immediately:

- suspend all relationships with them;
- inform his/her line manager and inform the Vigilance Institution in writing.

With regard to relationships with national, community or foreign Vigilance Institutions and in particular in carrying out periodic communications and notifications, the Company guarantees the completeness and integrity of the information supplied and the impartiality of assessments, seeking to be prompt with the fulfillments required of it by the P.A. Furthermore, the relationships with the Vigilance Institutions are also marked by maximum collaboration, avoiding, in any case, hindering institutional activity.

4.8 Relationships with mass media

The Company recognises the fundamental informative role of the Mass Media for the public. To this end, it is committed to fully collaborating with all the information bodies without discrimination, in observance of the mutual roles. Company communications to any information organisation must be true, clear, transparent and not ambiguous or instrumental; furthermore, they must be coherent, uniform and accurate, compliant with company policy and programs.

The relationships with the press and other means of mass communications are reserved for the corporate bodies and relevant departments.

With the aim of guaranteeing univocal information and supporting those who come into contact with the media, the declarations given on behalf of the Company must be subject to the prior authorisation of the relevant corporate bodies and departments.

The promotion of the Company respects the ethical values of the present Code and renounces the use of vulgar or offensive messages. The Company takes care of the information published on the institutional website so as to make it a complete, efficient instrument in line with market expectations.

4.9 Relationships with competitors

It is of paramount importance that the market is based on fair competition. The Group and its collaborators are therefore committed to maximum observance of the laws regarding the protection of competition and the market in any jurisdiction.

No collaborators can be involved in initiatives or contacts with competitors (e.g. price agreements) which could appear as a violation of the regulations for the protection of competition and the market.

5. Methods of implementation

5.1 Vigilance Institution and Code of Ethics

The control, implementation and observance of the present Code of Ethics is entrusted to the Vigilance Institution appointed as per articles 6 and 7 of Legislative Decree 231/01. In particular, the tasks of the Vigilance Institution,

without prejudice to the appropriate document called "Regulation of the Vigilance Institution", are as follows:

- to verify the observance of the Code of Ethics, with a view to reducing the risk of the offences envisaged by Legislative Decree 231/01;
- to follow and coordinate the review of the Code of Ethics, also through its own proposals for changes and/or updates;
- to promote and monitor the initiatives aimed at facilitating the communication and circulation of the Code of Ethics to all parties who must comply with the relative prescriptions and principles;
- to suggest an ethical training plan according to the GranitiFiandre S.p.A. Organisation and Management Model;

- to formulate its own opinions regarding assumed violations of the Code of Ethics of which it is aware, notifying any breaches to the relevant corporate bodies.

5.2 Circulation and notifications

The Code of Ethics and its updates are made known to all Addressees (both internal and external) by means of suitable communication activity and circulation so that the principles and values expressed therein are known and applied and individual initiatives that may generate behaviour which is not coherent with the reputational profile pursued by the Company are prevented. The Code of Ethics is published, also in the English version, on the website which is accessible to all. A hard copy of the Code is delivered to all directors, employees and collaborators upon appointment, hiring or starting the relationship with the Company, respectively. The Code of Ethics is subject to specific circulation campaigns for the clientele or other interested parties also in print, by post or in the most suitable way according to the situation.

The Addressees of the present code must notify any instructions which are in contrast with the law, the employment contracts, the internal regulations or the present Code of Ethics. Failure to observe the obligation to notify is expressly sanctioned.

In particular, any violation of the principles and dispositions contained in the present Code of Ethics must be promptly notified by the Addressees in writing, also anonymously, to the Vigilance Institution or the Manager of the Department/Service who, in turn, must directly inform the Vigilance Institution.

The Vigilance Institution evaluates the existence and risk of the violations reported in relation to the company values and the regulations in force; it also evaluates the violations of the Code and the existence of the possibility of criminal conduct, still within the context of its attributions and departments as per Legislative Decree 231/01.

The Company shall not tolerate any type of retaliation, discrimination or criminalisation for notifications reported in good faith, notwithstanding the binding obligations of the law and the protection of the rights of those who are accused erroneously and/or in bad faith.

The contact with the Vigilance Institution can be made in any way, either by sending a letter by post, including internal post, or via email sent to the email address dedicated and reserved for the Vigilance Institution.

The contact details of the Vigilance Institution are as follows:

- organismodivigilanza@granitifiandre.it;
- mail box set up GranitiFiandre S.p.A. reception.

5.3 Sanctions

With regard to the classification of violations of the prescriptions and principles in the present Code of Ethics, as well as the relative sanctions applicable, please refer to the prescriptions of the Sanctionatory System, especially issued by the Company, which is an integral part of the Company's Organisation and Management Model.

The Sanctionatory System, in brief, identifies:

- the addressees;
- the type of relevant violations;
- the criteria for the identification and issue of the sanctions;
- the type of applicable sanctions;
- the process for the actual issue of the disciplinary provisions.

In particular, the Sanctionatory System, in the limits and based on the requirements established therein, is for:

- Subordinate employees;
- Members of the company bodies;
- Partners;
- Auditing companies; Consultants (Consultancy companies, Lawyers...); Collaborators [para-subordinate workers, agents (e.g. promoters...), trainees ...]; Suppliers, other Third Parties which have contract relationships with GRANITIFIANDRE S.p.a. (e.g. Outsourcing companies, temporary employment agencies and personnel on leasing contracts...) - and therefore, Third Parties.

With reference to Subordinate employees, the sanctions envisaged by the respective National Collective Labour Agreement applied by the Company are applied, in observance of the procedures envisaged by Law no. 300 of 1970, namely the Statute of Workers' Rights. The disciplinary provisions issuable thereto are as follows:

- verbal warning;
- written warning;
- suspension of work and salary for a period of no longer than 10 days;
- dismissal for severe non-fulfillment of the contractual obligations of the employee (justified reason);
- dismissal due to such a serious non-fulfillment as not to allow even temporary continuation of the working relationship (just cause);
- dismissal from work but maintaining the salary for workers subject to criminal proceedings as per Legislative Decree 231/2001.

With regard to the Administrators and Auditors, the disciplinary provisions applicable thereto are a warning, reduction of remuneration or, in the most serious cases, convocation of a Meeting for the adoption of the suspension or revocation provision.

With regard to Third Party Addressees, by virtue of the special clauses included in the relative contractual relationships, any failure to observe the principles and regulations contained in the present Code of Ethics implies the issue of the sanctions of warning, the application of a penalty or the termination of the contract.

With regard to partners, in case of severe non-fulfillment of the obligations prescribed by the law or by the contract, or the prescriptions and principles stated in the present Code of Ethics as per Legislative Decree 231/01, they may be excluded from the Company.

Finally, with regard to the members of the Vigilance Institution, the Board of Directors provides the appropriate provisions in relation to the Disciplinary System for the respective category of the different components (subordinate employees or self-employed workers) and in observance of the rules envisaged by the Vigilance Institution Regulation.