



Organization, management and control model

In terms of legislative decree no.231,
dated 8 June 2001

CODE OF ETHICS

S.O.S. Italia S.r.l.

Sede amministrativa: Via dell'Acacia, 20 - 28021 Borgomanero (No) - Tel. +39-0322-834477 - Fax +39-0322-831209 - E-mail: sositalia@sositalia.com

Sede legale: C.so Liberazione, 56 - 28041 Arona (No)

P. IVA, C.F. e Registro Imprese di Novara n. 01495040030, REA 177588



INTRODUCTION

The values and principles stated in this **CODE OF ETHICS** reflect the ethical standards on which the work of SOS Italia s.r.l. continuously takes into consideration the needs and requirements expressed by each individual **COMPANY** stakeholder.

SOS Italia s.r.l. has been working for over 20 years in the sanitary faucet industry, introducing an innovative relationship between its industry and corresponding markets: think local and produce global. SOS Italia s.r.l. has the task of producing its own articles with qualified technical personnel, to achieve the highest quality and productive efficiency, evolving and emerging with its customers thanks to a mindful corporate culture, open to change.

OUR VISION

To achieve product excellence and offer exceptional service, representing a strategic global partner for operators of multinational corporations in the sanitary fittings industry.

OUR MISSION

To respond to global market challenges by studying ad hoc solutions, fully complying with international, technical, environmental norms and standards as well as safety in the workplace. To develop every individual project based on a continual product improvement approach, concentrating on material quality, maximizing process efficiency, implementing knowledge and expertise, while fully respecting and valuing the diverse cultures of the countries where we operate.

SCOPE OF APPLICATION

The provisions outlined in the **CODE OF ETHICS** are applied by all those who, according to the principles of a stable and provident management, and in compliance with the regional, national and EU community laws, as well as internal policies, plans, regulations and procedures, contribute to the activities of the **COMPANY**.



In particular:

- all **STAKEHOLDERS**, without exception, are responsible for the accomplishment and performance of their duties as part of their responsibilities to the **CODE OF ETHICS** principles;
- The **SUPPLIERS** are encouraged to respect the principles defined in the **CODE OF ETHICS**, for this purpose the **COMPANY** will disseminate its **CODE OF ETHICS** according to the methods considered most appropriate.

It is the **STAKEHOLDER'S** duty to know the contents of the **CODE OF ETHICS**, to understand its meaning, requesting any eventual information for clarification, and activate themselves to comply by the rules and regulations outlined in the code.

ETHICAL REFERENCE PRINCIPLES

By adopting the **CODE OF ETHICS**, the **COMPANY** reaffirms its commitment to respect, in the course of all its activities, the international, national and regional laws in force in Italy and in each country where it also operates through local branches.

In compliance with above principles of Legality, the **COMPANY** commits itself to perform its activities guided by the following principles:

- **HONESTY:** within the relationship with **CLIENTS**, among **STAKEHOLDERS** and **SUPPLIERS**, the acceptance and the practical implementation of anything declared in the **CODE OF ETHICS** is the essential element for a good company management.
- **TRANSPARENCY:** the **COMPANY** focuses on **STAKEHOLDER** relationships, communicating with full clarity and transparent context, avoiding any purposeful concealment of information, while simultaneously respecting all obligations of classified information.
- **IMPARTIALITY:** the **COMPANY** bases all its relationships on an objective criteria, treating or affecting all equally, absent of any discrimination regarding race, color, religion, national or ethnic origin, ancestry, age, disability, gender, pregnancy or maternity, marital status, sexual orientation, gender identity or expression, political or personal belief, or union membership.



- **VERIFIABILITY:** all the activities of the **COMPANY** are adequately registered to allow the verification of decision processes, authorizations and development processes.
- **ENVIRONMENTAL AND SOCIAL WORK VALUES:** the **COMPANY** pursues the achievement of its goals, considering the social and environmental effects resulting from the implementation of its activities, and committing itself in minimizing any possible negative impact it may cause.
- **GLOCAL APPROACH:** the **COMPANY** works at a global level, promoting the potentiality of its geographic origin (the Sanitary Fittings District of West Piedmont), developing and expanding local and international partners.
- **RESPECT:** the **COMPANY** and any **STAKEHOLDERS** are committed to recognize rights, decorum, dignity and personality of all the subjects with whom they collaborate. The **COMPANY** provides a work environment that is free from harassment and bullying of any kind and any other offensive or disrespectful conduct.

COMPANY MANAGEMENT PRINCIPLES

The **COMPANY** implements an administrative, accounting and financial management to ensure, in addition to an accurate and balanced management, a business continuity in the interest of all **STAKEHOLDERS**, **SUPPLIERS**, **CLIENTS** and all stakeholders entrusted in the **COMPANY**.

The **COMPANY'S** accounting system guarantees the registration of all transactions of an economic and financial nature in accordance with the principles, criteria and procedures for drafting and archiving the accounts imposed by current regulations.

CLIENT RELATIONSHIPS

The **COMPANY** pursues and maintains consistent quality standards in the conduct of its business in the various areas in which it operates.

The **COMPANY** believes in building a relationship with the **CLIENT** through trust, fairness, loyalty and recognition of the various professional and technical traits.



It is strictly forbidden to the **STAKEHOLDERS** to allow and perform any favoritism among the **CLIENTS**, which is likely to create inequalities in treatment or privilege positions in the service provided.

Any communication directed outside of the **COMPANY**, made in the form of documents, radio, television, internet or verbal speech, is made in compliance with the rules, business policies and the present **CODE OF ETHICS**.

To guarantee and provide complete and coherent information, it is defined that the relationship between the **COMPANY** and the mass media are held only by the **STAKEHOLDERS** expressly selected from time to time by the company directors.

RELATIONSHIP WITH STAKEHOLDERS

The **COMPANY** aligns its selection and recruitment process of its **EMPLOYEES** respecting the principles and values declared in the **CODE OF ETHICS** according to merit-based comparative criteria. The **COMPANY** also envisages optimizing the use of human resources by aligning its decision-making processes to the criterion of seeking maximum efficiency and achieving goals. For this purpose the **COMPANY'S** human resources are committed according to criteria of merit, competence and efficiency, with respect of the law, specific contractual obligations and of the ethical principles of reference.

The **STAKEHOLDERS** fulfill their office duties according to the commitments established within the signed contract with the **COMPANY** and shall comply its actions to the regulations implemented by the **COMPANY** and the present **CODE OF ETHICS**.

The **STAKEHOLDERS** are required to work according to the conditions specified by the **COMPANY**, in terms of technical/economic efficiency and accountability towards the various clients, both national and international.



Code of Ethics

It is absolutely forbidden that the **STAKEHOLDERS** give or receive money, presents or any benefits (whose small value does not constitute a sign of mere courtesy¹) from **CLIENTS** nor from **SUPPLIERS**.

The **STAKEHOLDERS** receiving presents or other benefits have to promptly inform the OdV, who will evaluate the extent and the relevance of it, will eventually arrange for the restitution, and to inform at the same time the **CLIENT** or the **SUPPLIER** about the **COMPANY** policy on the matter.

STAKEHOLDERS must respect the principles stated in the present **CODE OF ETHICS** each time he/she engages with other **STAKEHOLDERS**, **CLIENTS** and/or **SUPPLIER** by any means of communication, including mass communication or declarations which may reflect in any way on the **COMPANY** image and/or reputation.

The **STAKEHOLDERS** are committed to build and maintain the **COMPANY** value, even intangible, represented by a trustworthy relationship and reliability towards **CLIENTS** and **SUPPLIER**.

Compliance with the **CODE OF ETHICS** regulations constitute an essential and integral part of the contract obligations of the **STAKEHOLDERS**. The infringement of the principles at the base of the present **CODE OF ETHICS** will result in the application of what is prescribed in the disciplinary code, included in the General Part of the **ORGANIZATIONAL, MANAGEMENT AND CONTROL MODEL (MODEL 231)**.

RELATIONSHIP WITH SUPPLIERS

In selecting suppliers of any nature, the **COMPANY** chooses parameters of comparative evaluation to identify the best contractors, based on the quality of goods/service, confronting the best offer or the most advantageous offer, as well as the sales condition of the requested goods/service.

¹ For implementation of the present **CODE OF ETHICS** and of the **ORGANIZATIONAL, MANAGEMENT AND CONTROL MODEL (MODEL 231)/2001** of the **COMPANY** with "small value that constitutes a sign of mere courtesy" is understood to be a value not exceeding € 150,00 (one hundred and fifty euros) valued within the course of the solar year.



Code of Ethics

The **STAKEHOLDERS** are absolutely forbidden to carry out favours to **SUPPLIER** utilities, to constitute unequal treatment or give privilege in the procedures related to buying goods or services.

The **STAKEHOLDERS** responsible for issuing contracts or assigning tasks of any nature on behalf of the **COMPANY** must show the negotiation process in pursuit of the maximum advantage of the **COMPANY**, in the light of the criteria established by the sectorial rules and by the executing company orientation to guarantee the choice of the contractor, by standardizing its action to the principles of Transparency and Impartiality and in compliance of what the procedures state.

The **STAKEHOLDERS** mentioned in the previous paragraph, while performing the duties assigned to them, must act in the exclusive interest of the **COMPANY**, refraining from behaving in a way in which a conflict of interest may be perceived, or constituting a criminal offense or other illegal actions.

The infringement of the principles of the present **CODE OF ETHICS** made by **SUPPLIERS** may result in the termination of the standing contract, as well as give the right to the **COMPANY** to claim compensation for damage suffered as a result of the harm of its image and reputation.

For this purpose, the regulation of the relationship between the **COMPANY** and the **SUPPLIERS** may provide clauses for notice of termination with the above content.



GLOSSARY

COMPANY	<p>SOS Italia S.r.l. Registered office: CORSO LIBERAZIONE, 56 – 28041 ARONA (NO) Administrative office: VIA DELL'ACACIA, 20 – 28021 BORGOMANERO (NO) Operating seat: VIA DELL'ACACIA, 48/50 – 28021 BORGOMANERO (NO) VAT number: 01495040030 And all its organizational units.</p>
CLIENT	Any person, physical or legal, who in relation to the COMPANY , benefits from the services provided.
CODE OF ETHICS	COMPANY 's official document declaring the values, rights, duties and responsibilities of the entity to its "bearers of interest" (employees, suppliers, clients etc...). It is an integral part of the ORGANIZATIONAL, MANAGEMENT AND CONTROL MODEL (MODEL 231) .
DECREE	the Legislative Decree of 8 June 2001, No 231 and the following additions / amendments.
STAKEHOLDERS	all EMPLOYEES , trading partners and COMPANY members with any function or qualification.
EMPLOYEES	Means all EMPLOYEES in the COMPANY with any function and qualification as well as those who, acting in accordance with any of the rules laid down by the applicable law, provide services in a coordinated and continuous manner in the interest of the COMPANY .
ENTITY	Means any legal entity to which the provisions of the Decree are fully applied.
ORGANIZATIONAL, MANAGEMENT AND CONTROL MODEL (MODEL 231)	Corporate self-discipline system adopted by the Company, whose application is subject to the control of a Vigilance Body. The procedures to be followed while performing standard activities, are recalled to prevent crimes ex d.lgs. 231/2001 in compliance with the values and principles set forth in the CODE OF ETHICS .
VIGILANCE BODY (OdV) "ORGANISMO DI VIGILANZA"	A committee formed of statutory auditors, having "autonomous powers of initiative and control" compared to the Company's management body in charge of monitoring the effectiveness and observance of the Organisation, Management and Control Model (Model 231).
SUPPLIER	Any person, physical or legal, who has one or more benefits in favor of the COMPANY or who, in any case, has any relationship with the same without being qualified as EMPLOYEE .