

## Code of Ethics



**Specialtrasfo S.p.A.**

**Sede legale**

Via Rugabella, 1  
20122 Milano, Italy

**Uffici e stabilimento**

Via Firenze, 10  
20060 Trezzano Rosa (MI), Italy  
Tel. +39 02 95335248 - Telefax +39 02 95335256  
info@specialtrasfo.com

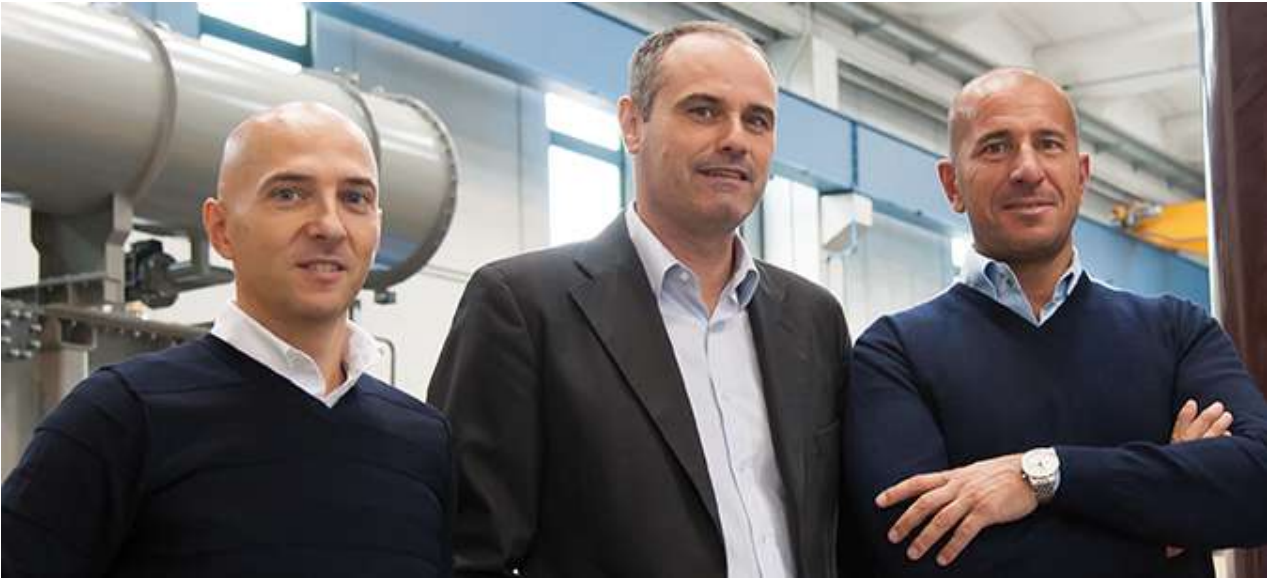


[www.specialtrasfo.com](http://www.specialtrasfo.com)

Capitale Sociale: EURO 200.000  
C.F. e Partita IVA: 13180160155  
R.I. N. 13180160155 C.C.I.A.A. Milano  
R.E.A. N. 1625570 C.C.I.A.A. Milano

## INDEX

1	Preamble .....	3
2	Build Trust and Credibility.....	4
3	Respect for the Individual.....	4
4	Create a Culture of Open and Honest Communication .....	5
5	Set Tone at the Top .....	5
6	Uphold the Law.....	6
6.1	Competition .....	7
6.2	Proprietary Information .....	7
6.3	Selective Disclosure .....	7
6.4	Health and Safety .....	7
6.5	Environmental protection.....	7
7	Avoid Conflicts of Interest.....	8
7.1	Conflicts of Interest .....	8
7.2	Gifts, Gratuities and Business Courtesies.....	9
7.3	Accepting Business Courtesies .....	9
7.4	Meals, Refreshments and Entertainment.....	9
7.5	Gifts .....	10
7.6	Offering Business Courtesies .....	10
8	Set Metrics and Report Results Accurately .....	11
8.1	Accurate Public Disclosures .....	11
8.2	Corporate Recordkeeping.....	11
8.3	Promote Substance Over Form .....	11
8.4	Accountability .....	12
9	Be Loyal .....	12
9.1	Confidential and Proprietary Information .....	12
9.2	Use of Company Resources.....	12
10	Do the Right Thing .....	13



## 1 PREAMBLE

This Code expresses the ethical commitments and responsibilities in the performance of business activities and corporate operations by the employees of Specialtrasfo and its subsidiaries, whether executives or employees of any sort of these enterprises.

Specialtrasfo's mission is to provide its customers with the best quality products and services available on the market through continuous development of the individual skills of our human resources, improvement of design engineering and technology of our products.

A good reputation is an essential intangible asset.

Unethical conduct in the performance of business activities compromises the relationship of trust between Specialtrasfo and its stakeholders.

Inherent to the Code is an ideal of cooperation working to the mutual benefit of the parties involved, in accordance with the role of each. For this reason Specialtrasfo requests that each stakeholder deal with the Company in accordance with principles and rules based on similar idea of ethic conduct.

The principles and provisions contained in the present Code of Ethics have as their target the members of the Board of Directors, as well as managers, employees and associated linked with Specialtrasfo by the way of contractual relations of any type, including occasional and/or solely temporary contracts.

**Specialtrasfo S.p.A.**

**Sede legale**  
Via Rugabella, 1  
20122 Milano, Italy

**Uffici e stabilimento**

Via Firenze, 10  
20060 Trezzano Rosa (MI), Italy  
Tel. +39 02 95335248 - Telefax +39 02 95335256  
info@specialtrasfo.com



[www.specialtrasfo.com](http://www.specialtrasfo.com)

Capitale Sociale: EURO 200.000  
C.F. e Partita IVA: 13180160155  
R.I. N. 13180160155 C.C.I.A.A. Milano  
R.E.A. N. 1625570 C.C.I.A.A. Milano



## 2 BUILD TRUST AND CREDIBILITY

---

The success of our business is dependent on the trust and confidence we earn from our employees, customers and stakeholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to say what we must do, but the proof is in our *actions*.

When considering any action, it is wise to ask: will this build trust and credibility for Specialtrasfo? Will it help create a working environment in which Specialtrasfo can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximize trust and credibility is by answering “yes” to those questions and by working every day to build our trust and credibility.

## 3 RESPECT FOR THE INDIVIDUAL

---

We all deserve to work in an environment where we are treated with dignity and respect. Specialtrasfo is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success.

In endorsing and managing contractual relations which entail the establishment of hierarchical relations, in particular with employees, Specialtrasfo undertakes to ensure that the authority is exercised in a fair and correct manner, without abuse of any form. In particular Specialtrasfo guarantees the authority shall not lead to any exercise of power that proves detrimental to the dignity or independence of an employee, and the decisions involving the organization of working activities shall safeguard the value of employees.

Specialtrasfo guarantees the physical and psychological integrity of its employees, with working conditions that respect the dignity of the individual, regulations for conduct based on good manners, and workplaces that are safe and healthy. Furthermore, Specialtrasfo acts to ensure that there are no episodes of intimidation, mobbing or stalking in the workplace.

Specialtrasfo is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to CEO Office.

In Specialtrasfo any requests or threats designed to lead individuals to commit acts that are against the law or the Code of Ethics, or act in a manner detrimental to the moral or personal convictions or preferences of anyone else, are not tolerated.



## 4 CREATE A CULTURE OF OPEN AND HONEST COMMUNICATION

At Specialtrasfo everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

Specialtrasfo will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

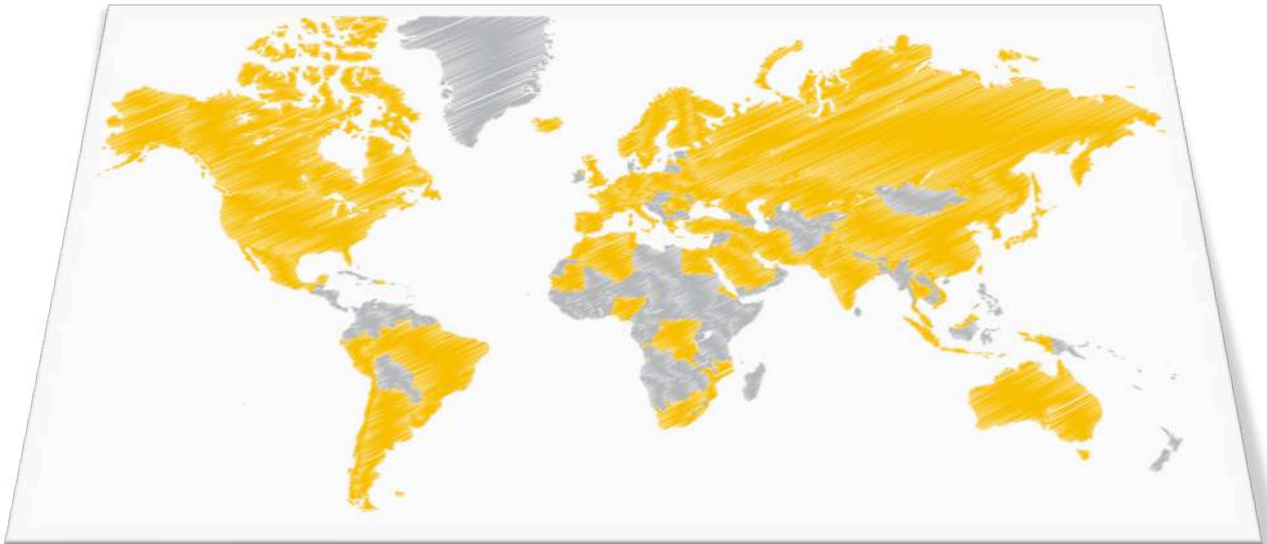
Employees are encouraged, in the first instance, to address such issues with their managers or the HR manager, as most problems can be resolved swiftly. If for any reason that is not possible or if an employee is not comfortable raising the issue with his or her manager, Specialtrasfo's CEO does operate with an open-door policy.

## 5 SET TONE AT THE TOP

Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At Specialtrasfo, we want the ethics dialogue to become a natural part of daily work.





## 6 UPHOLD THE LAW

Specialtrasfo's commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or Specialtrasfo policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

Personnel is hired with regular employment contracts. No form of irregular employment is tolerated. At the time the employment relationship is established, each employee receives accurate information regarding the characteristics of the function and the tasks to be performed, rules of employment and salary considerations, as governed by the national collective contract, regulations and procedures to be adopted in order to avoid possible health risks associated with his/her duty. This information is presented to the employee in such a way that acceptance of the job is based on an effective understanding thereof.

Because of the nature of our business, some legal requirements warrant specific mention.

**Specialtrasfo S.p.A.**

**Sede legale**  
Via Rugabella, 1  
20122 Milano, Italy

**Uffici e stabilimento**

Via Firenze, 10  
20060 Trezzano Rosa (MI), Italy  
Tel. +39 02 95335248 - Telefax +39 02 95335256  
info@specialtrasfo.com



[www.specialtrasfo.com](http://www.specialtrasfo.com)

Capitale Sociale: EURO 200.000  
C.F. e Partita IVA: 13180160155  
R.I. N. 13180160155 C.C.I.A.A. Milano  
R.E.A. N. 1625570 C.C.I.A.A. Milano

## 6.1 COMPETITION

We are dedicated to ethical, fair and vigorous competition. We will sell Specialtrasfo products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for Specialtrasfo or the sales of its products or services, nor will we engage or assist in unlawful boycotts of particular customers.

## 6.2 PROPRIETARY INFORMATION

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

## 6.3 SELECTIVE DISCLOSURE

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to Specialtrasfo, its securities, business operations, plans, financial condition, results of operations or any development plan. We should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material nonpublic information.

## 6.4 HEALTH AND SAFETY

Specialtrasfo is dedicated to maintaining a healthy environment. A safety manual has been designed to educate you on safety in the workplace. If you do not have a copy of this manual, please see your manager or HR or Company CEO

## 6.5 ENVIRONMENTAL PROTECTION

The environment is a primary resource that Specialtrasfo is committed to defending. To this end, and keeping in consideration the rights of future generations, in planning and carrying out its activities Specialtrasfo seeks to strike a balance between economic initiatives and vital environmental concerns. In addition to taking preventive actions against the risks to the population and the environment, Specialtrasfo is working to improve the impact of its activities on the environment, not only complying with regulations, but also taking into account best practices of the sector and the



development of scientific research.



## 7 AVOID CONFLICTS OF INTEREST

### 7.1 CONFLICTS OF INTEREST

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of Specialtrasfo may conflict with our own personal or family interests because of the course of action that is best for us personally may not also be the best course of action for Specialtrasfo. We owe a duty to Specialtrasfo to advance its legitimate interests when the opportunity to do so arises. We must never use Specialtrasfo property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Specialtrasfo.

**Here are some other ways in which conflicts of interest could arise:**

1. Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with Specialtrasfo.
2. Hiring or supervising family members or closely related persons.
3. Owning or having a substantial interest in a competitor, supplier or contractor.
4. Having a personal interest, financial interest or potential gain in any Specialtrasfo transaction.
5. Placing company business with a firm owned or controlled by a Specialtrasfo employee or his or her family.
6. Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all Specialtrasfo employees.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or company CEO.

**Specialtrasfo S.p.A.**

**Sede legale**

Via Rugabella, 1  
20122 Milano, Italy

**Uffici e stabilimento**

Via Firenze, 10  
20060 Trezzano Rosa (MI), Italy  
Tel. +39 02 95335248 - Telefax +39 02 95335256  
info@specialtrasfo.com



[www.specialtrasfo.com](http://www.specialtrasfo.com)

Capitale Sociale: EURO 200.000  
C.F. e Partita IVA: 13180160155  
R.I. N. 13180160155 C.C.I.A.A. Milano  
R.E.A. N. 1625570 C.C.I.A.A. Milano





## 7.2 GIFTS, GRATUITIES AND BUSINESS COURTESIES

Specialtrasfo is committed to competing solely on a merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by Specialtrasfo was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Specialtrasfo does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of Specialtrasfo or customers, or would cause embarrassment or reflect negatively on Specialtrasfo's reputation.

## 7.3 ACCEPTING BUSINESS COURTESIES

Most business courtesies offered to us in the course of our employment are offered because of our positions at Specialtrasfo. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at Specialtrasfo to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies that promote successful working relationships and good will with the firms that Specialtrasfo maintains or may establish a business relationship with.

Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when Specialtrasfo is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain Specialtrasfo business.

## 7.4 MEALS, REFRESHMENTS AND ENTERTAINMENT

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.

- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

## 7.5 GIFTS

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom Specialtrasfo does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than €100 may not be accepted unless approval is obtained from management.

Employees with questions about accepting business courtesies should talk to their managers.

## 7.6 OFFERING BUSINESS COURTESIES

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon [Company Name]. An employee may never use personal funds or resources to do something that cannot be done with Specialtrasfo resources. Accounting for business courtesies must be done in accordance with approved company procedures.

Other than to our government customers, for whom special rules apply, we may provide nonmonetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:





- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of Specialtrasfo.

## 8 SET METRICS AND REPORT RESULTS ACCURATELY

---

### 8.1 ACCURATE PUBLIC DISCLOSURES

We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

### 8.2 CORPORATE RECORDKEEPING

We create, retain and dispose of our company records as part of our normal course of business in compliance with all Specialtrasfo policies and guidelines, as well as all regulatory and legal requirements.

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with Specialtrasfo's and other applicable accounting principles.

We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of Specialtrasfo books, records, processes or internal controls.

### 8.3 PROMOTE SUBSTANCE OVER FORM

At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away.

At Specialtrasfo, we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that Specialtrasfo is committed to doing the

Specialtrasfo S.p.A.

**Sede legale**

Via Rugabella, 1  
20122 Milano, Italy

**Uffici e stabilimento**

Via Firenze, 10  
20060 Trezzano Rosa (MI), Italy  
Tel. +39 02 95335248 - Telefax +39 02 95335256  
info@specialtrasfo.com

[www.specialtrasfo.com](http://www.specialtrasfo.com)



right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we *should* do so.

Although Specialtrasfo's guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

## 8.4 ACCOUNTABILITY

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact our manager or the Company CEO.

Specialtrasfo takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

## 9 BE LOYAL

### 9.1 CONFIDENTIAL AND PROPRIETARY INFORMATION

Integral to Specialtrasfo's business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential supplier and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

### 9.2 USE OF COMPANY RESOURCES

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace. Employees and those who represent Specialtrasfo are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to nonprofit

organizations. We will not solicit contributions nor distribute non-work related materials during work hours.

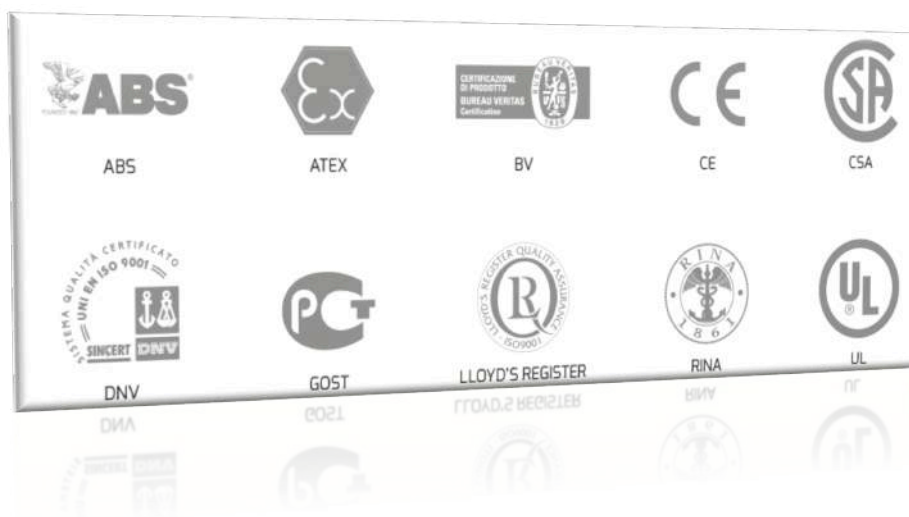
In order to protect the interests of the Specialtrasfo network and our fellow employees, Specialtrasfo reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or Specialtrasfo's intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your manager.

## 10 Do THE RIGHT THING

Several key questions can help identify situations that may be unethical, inappropriate or illegal. Ask yourself:

- Does what I am doing comply with the Specialtrasfo guiding principles, Code of Conduct and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- Am I being loyal to my family, my company and myself?
- What would I tell my child to do? Is this the right thing to do?





## Information and Resources

CEO : Mr. Francesco Pagano, [f.pagano@specialtrasfo.com](mailto:f.pagano@specialtrasfo.com)

Human Resources : Ms. Nicoletta Villa, [n.villa@specialtrasfo.com](mailto:n.villa@specialtrasfo.com)

Quality Manager .Mr. Igor Maino, [i.maino@specialtrasfo.com](mailto:i.maino@specialtrasfo.com)

**Specialtrasfo S.p.A.**

**Sede legale**

Via Rugabella, 1  
20122 Milano, Italy

**Uffici e stabilimento**

Via Firenze, 10  
20060 Trezzano Rosa (MI), Italy  
Tel. +39 02 95335248 - Telefax +39 02 95335256  
[info@specialtrasfo.com](mailto:info@specialtrasfo.com)



ISO 9001:2008

[www.specialtrasfo.com](http://www.specialtrasfo.com)

Capitale Sociale: EURO 200.000  
C.F. e Partita IVA: 13180160155  
R.I. N. 13180160155 C.C.I.A.A. Milano  
R.E.A. N. 1625570 C.C.I.A.A. Milano