



SAVER S.p.A with sole shareholder

Registered office: Via della Moscova 14

20121 MILAN (MI) – ITALY

Operational Headquarters: Via Soncino snc

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CODE OF ETHICS AND RULES OF CONDUCT

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Share Capital Euro 120,000.00

Registered with the Register of Companies of Milan register number 05918200154 - Chamber of
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Tax code and VAT number IT05918200154



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Premises

1.0.1 Objectives

Saver is aware that its work contributes, with responsibility and moral integrity, to the development process of the global economy and to the civil growth of its reference community.

Saver believes in the value of work and considers lawfulness, fairness and transparency of action to be essential prerequisites for achieving its economic, productive and social objectives.

To this end, Saver has decided to implement this code of ethics to adapt its organisational structure to the general principle of proper conduct and administration, in order to orient the company's activity with greater attention and commitment towards full and total compliance with the law.

1.0.2 Implementation

This Code of Ethics was first undersigned by Saver's legal representative on 12.03.2010 and subsequently updated to the current edition.

Through the implementation of this Code of Ethics, Saver has given itself the set of rules:

- of conduct, in relations with external stakeholders, partners, the market and the environment, with which Saver relates its internal and external activity, demanding compliance from all its components, whether top management or subordinates, as well as partners external parties, consultants and, to the extent applicable, external stakeholders including subcontractors and suppliers;
- of organisation and management, aimed at creating an efficient and effective system of planning, execution and control of activities such as to ensure constant compliance with the rules of conduct and prevent their violation by any person who operates with and for Saver in the aforementioned meanings.

1.0.3 Dissemination

The Code is widely distributed internally and is available to any of Saver's stakeholders also through its publication on the Saver website, deemed the means enabling maximum dissemination, in order to represent externally the expression and ethical involvement of the company's behaviour in full respect and pursuit of lawfulness in all its evidence and expression in corporate life. Each of Saver's partners is required to know and respect the provisions of the Code; Saver carefully monitors compliance with the Code, providing adequate information, prevention and control tools and intervening, if necessary, with disciplinary measures and corrective actions.

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1.0.4 Update

This Code can be modified and completed upon the decision of the legal representative of Saver, also and above all on the basis of the suggestions and indications coming from the company RSPP in possession of the legal requirements in fulfilment of the obligations established by Legislative Decree 81/2008 as amended.

PART I

Rules of business conduct

Section I

External practices

1.1 Free and fair competition on the global market

Saver pursues free and fair competition and aims its actions towards obtaining competitive results that reward ability, experience, efficiency and effectiveness.

Saver and its partners must behave correctly in matters of interest to Saver and in relations with the Public Administration and the relevant control bodies.

Any action aimed at altering the conditions of fair competition is contrary to company policy and is prohibited for any person acting for or with it.

In no case can the pursuit of Saver's interests justify the conduct of top management, such as subordinates or partners or consultants, which does not comply with the laws in force and with the rules of this Code.

In every external communication, the information regarding Saver and its activities must be truthful, clear and verifiable.

1.2 Relations

1.2.1. With external stakeholders.

Saver's relations with any stakeholder, public or private, must be conducted in compliance with the law and the principles of fairness, transparency and verifiability. In particular, relations with public employees must comply with the principles and provisions envisaged by Decree of the President of the Republic no. 62/2013 published in the Official

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Journal no. 129 dated 4 June 2013, which came into force on 19 June of the same year (Code of conduct for public administration employees).

Any form of gift that may even appear to exceed normal business or courtesy practices, or in any case aimed at acquiring preferential treatment in the conduct of any activity, procedure or otherwise, is not allowed.

With respect to representatives or public administration employees, the search for and establishment of personal relations of favour, influence or interference capable of influencing, directly or indirectly, the outcome of the relation, are forbidden; furthermore, even indirect offers of goods or other benefits to representatives, officials or public administration employees, even through third parties, are prohibited, unless they are gifts of modest value and in accordance with good practice and provided that they cannot be taken as means for seeking undue favours.

Saver does not provide contributions, advantages or other benefits to political parties and/or workers' trade union organisations, nor to their representatives, unless in compliance with applicable legislation.

1.2.2. With customers and clients

Saver bases its activity on the criterion of maximising quality standards, essentially understood as the objective of reaching full customer satisfaction.

In relations with customers and clients, Saver ensures fairness and clarity in business negotiations and in the assumption of contractual obligations, as well as faithful and diligent contractual fulfilment.

When participating in tenders, Saver carefully assesses the adequacy and feasibility of the services requested, with particular regard to the technical and financial conditions, the safety of its own personnel as well as that of other personnel with whom it interacts and environmental matters, promptly pointing out, when possible, any anomaly.

The formulation of the offers will be such as to allow compliance with adequate quality standards, appropriate levels of remuneration for employees and current safety and environmental protection measures.

Saver resorts to litigation only when its legitimate claims do not find due satisfaction on the stakeholder's part, even in a preferable friendly and conciliatory environment.

When conducting any negotiation, situations in which the parties involved in the transactions are or may appear to be in conflict of interest must always be avoided, trying to operate with the greatest possible transparency, in any case respecting the confidentiality of the company's know-how.

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1.2.3 With suppliers

Relations with suppliers, including financial and consultancy contracts, are governed by the rules of this Code and are subject to constant and careful monitoring by Saver.

Saver uses suppliers, contractors or subcontractors who operate in compliance with current legislation with reference to safety, the environment, tax and labour policies and the rules set out in this Code.

1.3 Environment

Saver's production activities are managed in compliance with current environmental legislation with reference to the chemical substances used, emissions into the atmosphere, approvals of lifting equipment, risk assessments, fire prevention regulations, etc.

When Saver promotes, plans or entrusts the planning of building interventions, Saver carries out or ensures that, among other things, all the necessary investigations are carried out to verify the possible environmental risks deriving from the intervention and prevent any damage, always with preventive presentation of the DIA.

Saver is committed to spreading and consolidating a culture of environmental protection and pollution prevention among all its partners and subcontractors, developing awareness of the risks and promoting responsible behaviour on the part of all its partners with reference to fuel saving, reduction of waste, and compliance with eco-sustainable policies.

Section II

Relations with partners

2.1 Work

Saver recognises the central role of human resources as the main success factor of every project, within a framework of mutual loyalty and trust between employer and workers.

All personnel are hired with a regular employment contract.

The employment relation is carried out in compliance with the collective contractual regulations of the sector and with social security, tax and insurance regulations.

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Saver promotes the continuous improvement of the professionalism of its employees, also and above all through the carrying out of training, information, verification and even disciplinary initiatives, all aimed at pursuing the company objectives in terms of quality and safety standards in constant monitoring and verification.

Any kind of discrimination based on gender, religion, sexual, political preferences and attitudes is strictly prohibited.

2.2 Safety and health

Saver guarantees the physical and moral integrity of its partners, working conditions that respect individual dignity and safe and healthy working environments, in full compliance with current legislation on accident prevention and protection of workers in the workplace.

To this end, Saver constantly monitors and updates its Risk Assessment Document (DVR).

Saver carries out its activity following technical, organisational and economic criteria and conditions in order to ensure adequate accident prevention as well as a healthy and safe working environment and, to this end, has implemented an integrated safety and quality system in constant verification and monitoring.

Saver undertakes to disseminate and consolidate a culture of safety among all its partners and subcontractors, developing awareness of risks and promoting responsible behaviour by everyone and **committing itself not to grant and/or terminate subcontracts towards third parties who engage in inappropriate conduct which violate mandatory health and safety regulations.**

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