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## Implementation of Italian Legislative Decree 231/2001 to avoid commission of crimes such as bribery, corruption, modern slavery and breach of safety at work legislation

Forgital Italy S.p.A. recognizes the importance of having a system that guarantees the correctness and integrity within its organization. The values of **honesty** and **integrity** are of utmost importance and Forgital Italy s.p.a.

Italian Legislative Decree 231/2001 has introduced in Italy a liability for companies whose directors/employees/any other persons managing and/or acting in the interest of the same company are convicted for a certain number of crimes (including bribery, corruption and modern slavery, breach of safety at work legislation), when such crimes are committed in the interest or for the benefit of the company itself. Italian Legislative Decree 231/2001 requires Italian companies, on a voluntary basis, (i) to adopt an internal risk prevention and control system with appropriate relevant procedures (the so-called Organization, Management and Control Model “*Modello di organizzazione, gestione e controllo*”, hereinafter referred to as “Model 231”) and (ii) to appoint an internal Supervisory Body (the so called “*Organismo di Vigilanza*”) which should control the implementation of the Model 231 and its effectiveness in order to prevent the crimes provided for by Legislative Decree 231/2001.

Forgital Italy s.p.a. has implemented the Model 231 in order to avoid the commission of crimes (including bribery, corruption, modern slavery and breach of safety at work legislation) in the conduct of its business.

A Supervisory Body has been appointed to verify the correct implementation of the Organization, Management and Control Model and its continuous updating.

Specific procedures have been set up to ensure that no crimes such bribery, corruption, modern slavery and breach of safety at work legislation will take place.

The Model 231 includes an Ethical Code to ensure that all the activities of our company are conducted in compliance with the highest standards of prevention of crimes. The key principles of this code are **Legality, Morality, Dignity, Equality** and **Professionalism**.

Compliance with the Model 231 and the Ethical Code is an integral part of the contractual obligations of Forgital Italy directors, managers, employees and supply chain.

Velo d'Astico, 01 March 2018

Forgital Italy Spa  
President 