

Code of ethics

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and revised on January 25, 2018

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1 Introduction

It is 45 years that the company is active in vehicles accessories sector.

As time passes G3 spa has grown up (developed) thanks to its modern systems of planning and production.

The company focuses on quality security and design of their accessories. Thanks to these guidelines, the company was able to reach agreement with the most important national and international car companies.

Fiat, Alfa Romeo, Lancia, Maserati, Audi, Volkswagen, Seat, Skoda, Kia, Hyundai, Ford, Mitsubishi, Nissan, Opel, Peugeot, Citroen, Dacia e Renault has chosen G3 spa.

If we speak about extension and geographical dimension, the company has an important role in promoting economic development and social welfare of the area.

For this reason the ethics code has been created and it is based on ethics legality and transparency, whose observance has a fundamental importance both for the operation and the affability of the company and for the prestige, the image and the know-how

The ethics code contains the values and the guidelines, which must be respected by all the stakeholders of the company.

G3 spa appreciates and encourages the constructive contribution in order to improve the set of values and the principles that it recognizes has its own.

2 Our values

The values are considered as the image of the company all over the world.

Since 1973, the most important values are quality, research and development.

Beside these, during the years the company has increase its set of values and nowadays one of the most important is the respect and the guardianship of the environment.

G3 spa strongly believes that preserve and respect our planet could be led to the development of the sense of responsibility towards costumers. These values make our product unique.

In addition, the company pays attention to the guardianship of the workers. It is obtained throw the respect of the safety rules and training courses for the employees. This kind policy stimulates and improves the ability of workers.

All the national and international activities of G3 spa must be performed in compliance with the law.

That means respecting the principles of honesty, integrity, correctness, good faith, transparency, efficiency and opening to the market.

All the people that work or operate in the company, without exceptions, have to observe the principle within their functions and responsibilities.

With implementation of the code, G3 spa undertakes to comply with the Universal declaration of the Human Rights of the U.N. (Organization of the United Nations) and the Fundamental conventions of the ILO (International Labour Organization).

3 Addressed

The ethic code is applied and binding for member of member of corporate management, directors, auditors, shareholder and all the employees of G3 spa.

The company intend to oppose every behaviour contrary to its values, principles and directives even if this behaviour is supported by the conviction to act for the benefit of the firm.

The observance of the Code is an essential part of the contractual obligations of the recipients.

The violation of the norms of our code can constitute a breach to the obligations of working relationship or disciplinary offence, with every consequence provided by law. Furthermore, that may entail the compensation of damages.

For the full compliance of the code, every recipient should refer to his superior or consulting and/ or to the direction. It also possible apply the procedure laid down by the whistleblowing policy.

4 Conduct of business

4.1 General principles

Every function executed by the company in performing the business must be inspired by the principles of honesty, fairness, integrity, transparency, legitimacy, efficiency, clarity, opening to the market, reciprocal respect as well as check according to the law and all the dispositions of the countries in which the firm works.

Moreover, every transaction and business operation must be recorded, authorized, verifiable, legitimate, and coherent.

The recipients which actions may be referred to the company will have to follow correct behaviours during the business or during the relationship with third parties, regardless of the competitiveness of the market and the importance of the deal.

The economic resources, as well as the goods of the company, shall not be used for unfair or not legitimated purposes.

Any advantage can come from illegal practices, illegitimates economic utilities or similar.

4.2 Conflict of interest

Every decision or business choose made by G3 spa correspond to its best interest.

The company recognizes the administration and Mayor's right to participate in activities of other kind, out of those made following the interests of the firm. Provide that, these external activities must respect the law and they don't have to be in conflict with society's actions.

Moreover, these activities must be compatible with obligation of the law and with those assumed towards the company.

Personnel must respect the obligations laid down by the law and the labours contracts. They also have to follow fidelity obligations towards the society and refrain from dealing on own account or on behalf of third parties.

It is forbidden divulgate news of the society as established to the following paragraph 4.3

4.3 Confidentiality obligation

The knowledges developed by the company constitute an important resource and every recipient must protect it. The protection of confidentiality of information sources and personal datas is an important value for the reputation of the firm and for the truth that its own clients puts back.

Every news, information or material relate to business organisation, negotiation, financial and commercial operation (such as photos, contracts, acts, software, studies and relations); or more in general every information relate to G3 spa, its know-how, its criterions of design, of planning, of production, of sales, of advertise, of price policy and more in general each element concerned the activity of the company.

As well as every information received by third parties (costumers, suppliers, workers) during the company activity they are owned by the company or by the third that has communicated it to the firm.

Therefore it is not allowed to divulgate, communicate or use those information, if not for fulfil the task or their submitted duties.

The confidential obligations remain, even after the terms of the relationship with G3 spa; Up to when the information become public beyond the control of the addressees.

4.4 Presents and other utilities

It is prohibited for employees to receive or give cash, gifts, assets, services, favors or any item of value form customers, suppliers, government representatives and, in any event, from any third party with whom G3 entertains relationships.

Tokens of courtesy, such as compliments or form of hospitality, are allowed when they have a moderate value (maximum 50 euros) and they do not have to be interpreted by any impartial person as finalized to obtain improper advantages.

Employees who receive gifts of higher values are required to give notice to their direct superior or to the Supervisory Body, which will assess the entity and relevance of the gift.

4.5 Competition

In line with the principles above, the company recognizes the importance of competitive markets and it tries to reach the success through the supply of products, technologies and innovative services.

The recipient must respect the norms about competitions, avoiding some practises (creation of cartels, divisions of markets, limitations to the production or to the sale, conditioned accords, etc.) that represent a violation of competition law.

5 Personnel

5.1 General principles

The company recognize that the motivation of its employees is an essential factor for the competitiveness of the firm, for the creation of value for the stakeholders and for the satisfaction of the costumers.

Every employer must work in a free place where aren't allowed discrimination of any kind related to gender, race, language, religion, political opinion, personal and social conditions.

The company undertakes to develop the skills and the attitudes of each worker and it encourage the participation to courses of updating and formative programs in order to reach the business objectives. The Society protects the psico-physics integrity of employees and the respect of their personality avoiding illegitimate conditionings or difficulties.

All the employers are hired according to regular contracts and every form of irregular work is not admitted.

5.2 Employees in responsibility position

All the employees that assume responsibility position must represent an example of behaviour. They also represent a leadership guide in accordance with the behaviours rules laid down in the ethics code. All the manager have to guarantee guardianship of the people who have reports any violation of the code.

5.3 Same opportunity

The society offers the same opportunity of job and professional growth and it must ensure an equitable treatment, based on criterions of merit its and without and kind of discriminations

5.4 Harassment

The company strictly prohibits harassment of any type such as those connected to the race, to the sex or to other personal characteristics.

There aren't allowed harassment neither inside nor outside the workplace

5.5 Workplace

The employers must keep a decent workplace where the dignity of everyone is respected.

In particular each employee:

- He is not allowed to use drugs, hallucinogens or any other mind-altering substances during regular performance of their duties or during working hours.
- He must respect the smoking law smoking especially in areas where cigarette smoke can be a hazard to the health and safety of other individuals and the work environment.
- He must avoid harassment, intimidation and verbal offence against colleagues or other parties

5.6 Presents and other utilities

It is prohibited for employees to receive or give cash, gifts, assets, services, favors or any item of value (not including small tokens of courtesy) from customers, suppliers, government representatives and, in any event, from any third party with whom the company entertains relationships, for the purpose of Influencing decision-making to obtain better treatment, undue services, or any other purpose.

Employees, who receive gifts of higher value, excluding tokens of courtesy, are required to give notice to their direct superior or to the direction.

5.7 Corporate assets

The corporate assets is composed by material goods, such as furnishing, decors, infrastructures, equipment, machineries, computer and immaterial goods such as reserved information, know-how, technical knowledge which are developed and diffused to and from the members of the Management and from the Employees, rights of license, brands and brevets.

The security, the protection and the reservation of these goods is an important value for the company and for the safeguard of company law and interest.

Every member of the management and every employee it is personally responsible of the maintenance of the company goods, through the respect of the business laws.

Managers and employers have to prevent the fraudulent or improper use of the business patrimony. The use of these goods must be functional to the company activity or to the purposes authorized by the functions business parties.

5.8 Tools of mobility and business computer systems

Every employer, during his work, must protect the tools of mobility and the business computer systems.

Workers must respect the policies and avoid every improper use that can damage or reduce the efficiency or the value of these tools and systems.

To clarify the tools of mobility, the informatics and telematics resources and the electronic mail are works instrument so every recipient must keep in mind that the use of this instrument is inspired to the principles of legality, diligence and correctness.

In particular, the recipients that make use of the business computer systems must adopt the inside rules, direct to avoid incorrect behaviours or damages to the Society, to other recipients, to commercial partner or to third parties.

The unities of net are sharing areas of professional information and they cannot be used for different purposes.

The company has the right to remove every file or application that could be dangerous for the safety of the system. Therefore, it is not allowed file purchased or installed in violation of the present Code and of the policies in force.

In case of contractual and juridical violation, either the firm or the single recipient that use the informative systems are potentially prosecutable with sanctions, also of penal nature.

The company will verify the respect of the rules and the integrity of its own computer system, also adopting measures to prevent the access to indecorous, offensive or illegitimate web site.

5.9 Collaboration and information requirement

All the employees have to:

- Show their own collaboration in order to find out the possible violation of the code
- Contact their direct superior in a position of authority and/or the direction so as to receive some explanations on the formalities of application of the code
- Directly report to their hierarchical superior and/or the direction and/ or using the procedure specified in the Whistlerblowing policy

6 External relationship

6.1 General principles

The society is committed to promoting and to asking for the respect of the law and of the principles of this code from any third subject with which has a juridical relationship.

6.2 Relationship with costumers

The company pays attention to the costumers in order to achieve quality relationship with everyone who realize or purchase products or services from the society, in view toward achieving greater collaboration and higher professionalism.

The clients constitute an important part of the business assets of the society

During the relationship with the costumers, every recipient represent the company and to that they have to stamp their behaviours to the professional respect of the privacy of information gained throw the activity as well as of the in force normative in theme of guardianship of personal data.

The company consider it is important that the clients are treat in a correct and honest way. Therefore, every relationship and contact with the clients must be based on the full respect of society's values.

In particular, in terms of its relationships with customers, each addressee of this Code of Ethics is required:

- To act in compliance with the law and the internal procedures for the management of clients relationship.
- to provide comprehensive and truthful information about the products and services provided by the society
- to fulfil with professionalism to every contract stipulated by the society in order to satisfy every reasonable expectation and necessity of the clients
- to oppose and to reject any facing behavior to get confidential information in the respect of the in force law about antitrust and loyal competition
- to protect every intellectual right of ownership and every author's right, brevet, mark and sign of recognition in accordance to the available procedures for their guardianship

6.3 Relationship with vendors

The society recognizes that the attention to the selection and the control of those suppliers that provide goods and services to the company, including the free professionals, it constitutes an essential element for offering quality, sure and competitive products and services on the market.

Also during the relationship with vendors, every recipient represent the company so they have to stamp their behaviours to the professional respect of the privacy of information gained throw the activity as well as of the in force normative in theme of guardianship of personal data.

The company consider essential that vendors are treat in a correct and honest way. Therefore, every relationship and contact with the clients must be based on the full respect of society's values.

In particular, during the selection-process of suppliers, the company must take into account the objective and transparent evaluations of their professionalism and their entrepreneurial structure.

Furthermore, the society considers the quality, the price and the formalities of carrying out and

delivery the service in order to reach the best possible conditions in terms of safety, quality and costs of the products and/or offered services. Besides that, the company will evaluate the appreciation on the market, their ability to face the obligations of reservation as well as the criterions of social responsibility and their compatibility and adequacy to the dimensions and the necessities of the Society.

The employees must maintain an open dialogue with vendors in accordance with the good commercial customs.

The vendors must develop their activities following the standard of behaviour consistent with the code. In particular, they must ensure the seriousness during the business, the respect of workers' rights, the investment in quality and the responsible management of the environment and of the social impact

6.4 Relationship with competitors

The society pursues the success on the market through the supply of products and innovative and competitive services under the national and international law put on guardianship of honest and fair competition

In particular, thanks to the in force national and international law in theme of competition, the activities of the Society and the behaviours of the recipients must inspire to the most complete autonomy and independence in comparison to the behaviours of the competitors on relevant markets.

6.5 Relationship with public institutions

During the relationships with the Authorities and the Italian or foreign Public Institutions and with their officials and employed, the recipients must act in the full respect of the principles and the norms of the present Code and, however, with correctness and transparency.

Undertaking commitments with the government and public institutions is reserved exclusively to officers authorized and designated to do so.

With reference to the authority and to the public institutions, except as provide in the paragraph 4.4, recipients are not allowed to promise or offer, directly or indirectly, to public employees or public officials every kind of gifts (not only under the form of amount in money, but also goods), benefits or other utilities to promote or to favor the affairs of the Society.

The company cooperates in a full, transparent and effective way with the Authorities and the Public Institutions also during their usual activities of verification and control.

It is mandatory for addressees to ensure that the public grants, contributions, loans and discounts received are used only for the business activities or initiatives for which they have been granted, as any other use is prohibited.

6.6 Relationship with political and social organizations

Relationships with political parties or their representatives are marked by the strictest respect for transparency and correctness principles. These relationships are focus on favor a correct dialectics, without any discriminations or unequal treatments, with the aim to establishing a climate of confidence.

Undertaking commitments with the political and social organization is reserved exclusively to officers authorized and designated to do so.

Economic contribution from the society are admitted if expressly allowed by the law and if authorized by the responsible company organs. Possible contributions from single employees are defined as personal and volunteers contributions

6.7 Relationship with community

The company and its employees must maintain a responsible behavior, respecting the essential values of a clean environment, which led to a healthy and sure workplace. Moreover, G3 spa assures to respect every culture and tradition of the country where work .

In conformity with the convention of O.I.L G3 spa doesn't involve children labor, it means that the society doesn't employ people under the age established by the normative of the place where the work performance is performed. In every case, the work performances made by people under the age of 15 are not admitted, subject to the exception provide for international conventions and eventually for the local legislations.

The society also undertaken not to establish relationships of business with suppliers that employ minor labor, as above defined.

6.8 Communication and company information

The Society recognizes the primary role of a clear and effective communication both in the internal and external relations. In fact, the communication and the external relationships influence, directly and indirectly, the business development.

It is necessary that all the activities are organized according to clear and homogeneous criterions, taking into account both of the necessities of the different lines of business and of the economic and social role of G3 spa.

The information from the outside must be, in every case, timely and coordinates with the direction in order to achieve the benefits from the dimension and from the potential of the Society.

The employees must divulgate information connected to the sector and the geographic area in a form of speeches, conferences shares, publications or any other form of presentation, which must follow the guidelines issued by the direction. Furthermore they must be authorized by the C.E.O

6.9 Relationship with media

The communication and the media have an important role in order to improve and maintain the image of G3 s.p.a. Consequently, every information concerning the company must be truthful, accurate, homogeneous and in compliance with the policy and the business programs.

Only persons who have been specifically identified by company management maintain relationships between the company and the media.

The promotion of the society respect the principles set forth in this Code of Ethics and it reject every use of vulgar or offensive messages. Furthermore, the society takes care of the information published in the institutional web site in order to make it a complete and efficient communication instrument.

7 Health, safety and environment

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The aim of the society is to protect the human resources and to guardianship of the environment, looking for the necessary synergies both inside and outside thanks to its customers, vendors, subcontractors, commercial partners and companies involved in the activities of G3 spa. The company respects the legislations and the rules on health, safety and environment. In addition, the company tries to inform all the stakeholders about these themes, in order to improve the health and safety conditions in the workplace with the purpose to prevent accidents or professional illnesses. The company respects the principles of minimization of the environment and of the optimization of the use of the resources. The society undertakes to product and sell, in compliance with the law, products meeting the higher standard of in terms of environmental and safety performance. The company informs all the employees around the specific assignment and it required the maximum effort to reach the goals above mentioned. No dependent must set the other employees in front of useless risks that can provoke damages to their health or physical safety.

All employees must:

- To correctly use the equipment, the resources and the safety devices.
- To report the weakness of the equipment and the resources as well as the eventual danger condition and, in case of urgency, directly using their own competences in order to eliminate or reduce such problems or dangers.
- No change or remove, without the authorization, the security or control devices
- No complete on their own initiative operations which can compromise the proper security or of other workers or of the surrounding environment;
- To undergo to the medical visit and to the sanity control in accordance with the in force law.

Each employee must takes care of his own safety and his own health and of that of the present people on the workplaces, whether they are internal or external. In this last case, every employee has to take care that someone properly manages the interferential risk and he have to avoid every potential dangerous situation even on the surrounded environment where can revert the effects of its actions or omissions

8 Administration, financial and control

The society commits to operate with the maximum transparency toward the shareholder.

The principle of transparency of the account records doesn't concern only the managers and the employees of administrative offices but it is applied to every member of the management and every employee, in any business he operates.

The transparency of accounts is based on truthfulness, comprehensiveness, and transparency.

Management and employees must collaborate so that the facts of management are represented in a timely and correctly way.

All the conducted operations must be authorized, verifiable, legitimate and coherent between them.

To this end, every transaction must include records that provide complete and comprehensive supporting documentation of the activities performed, in order to allow:

- Accurate bookkeeping;
- Immediate identification of the level of responsibility and reasons underlying each transaction;

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- Subjective imputability of the operations
- accurate formal reconstruction of the transaction in order to reduce interpretative mistakes

Every recording must exactly reflect what it results from the documentation of support. Therefore, it will be the responsibility of each employee assigned to ensure that the supporting documentation is easily accessible and maintained in order according to logical criteria.

All the bookkeeping or financial documents and, particularly, those destined to the Public Authorities or that will be made public must be complete, accurate, reliable, clear and comprehensible.

Every financial or monetary transaction is recorded in respect for the principles, criteria and methods of preparation and maintenance of accounting dictated by the in force law.

The society assure manager decision (inclusive those related to investments and transfers) based on solid economic analyses that understand a prudent evaluation of the risks and which guarantee that business goods are employed in an optimal way.

9 Violation and information request

The code and its upgrades are brought to the knowledge of all the Recipients (internal and external) through suitable activity of communication and diffusion so that the values and the principles contained in it are known and applied.

The code of ethics is published on an available to everyone website: www.g3spa.it

Every addresser who learns of alleged violations or conduct that does not comply with the rules of conduct adopted by the company must immediately notify their direct superior and/or the competent authority with the terms and with the formalities explained in the previous paragraphs.

Every reports coming from the addresser of the violation of the norms and the principles of this code and or every explanation regarding it must be sent in a writing form as it follows:

- If it comes from the employees to their own hierarchical superior as part of the normal business relationship or directly to the Direction.
- for every other recipient directly to the Direction;
- And/or using the suitable procedure of Whistlerblowing.

The hierarchic superior, in present of reports received by from the employees, must inform the Direction on the reports, on the progress of the possible checks and on the possible assumed sanctions.

The report can be achieved in every way, both through a letter (also inside the Society) and through an e-mail addressed to the box of the electronic mail of the hierarchic superior or to the box mail reserved to the direction.

Anonymous reports are allowed even if the identification of the reporters is incentivized with the purpose to get a best and more complete collection of information.

Every form of retaliation against who has made the reports in good faith or who has asked for explanation about the implementing rules constitutes a form of violation of the present code. It constitutes a similarity violation the behavior of whom accuse other employees of the violation of the code with the awareness that such violation does not exist.

Every recipient is encouraged to ask for more information or explanations regarding the principles of the present Code.

10 Procedure and disciplinary sanctions

The violation of the norms of the code, understood as actions or behaviors not complying with the code, from the employees in can be considered such as a violation of the contractual obligations undertaken, implying the legal consequences laid down by law as to contract termination or termination of the assignment granted and settlement of any resulting damages.

Law, norms and the collective bargaining in force provide the different sanctions. They will be proportionate to the gravity of the violation but they never affect the dignity of a human person. The sanction is imposed by the competent business function.

As for the non-observance to the dispositions of the present Ethical Code from other receivers, the sanctions will be those provided by the law and\or set out juridical relationships in force with the law.