

QUALITY ASSURANCE

ETHICAL CODE

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1. GENERAL PRINCIPLES

This Ethical Conduct Code contains the basic principles that govern the business activities and relationships that Universal Selecta engages with stakeholders.

The core values on which these principles are built are: Fairness, Honesty and Respect.

Fairness means the spontaneous observance of the rules of culture reference, education, loyalty and the consequent refusal of lies and betrayal. Honesty means acting rightly and justly and in a coherent way with those moral principles commonly believed as valid. Consequently Honesty rejects deception and concealment in any form.

Respect means the recognition of rights, the role, the dignity, the decency of people or property and the consequent abstention to bring them offense or harm.

The application of these three values has, as its first fundamental result, the absolute respect of the moral principles of the Western civilization.

In particular, Universal Selecta guarantees:

- Full respect for human rights;
- The rejection of race, religion, gender and social background discrimination;
- The absence of any form of discrimination in respect of employment and occupation;
- Abstaining from the use of child labor.

In second instance, the application of these values implies the strict observance of all rules and all civil laws, of penal code and of jurisdiction, as well as the compliance of national laws and regulations in force in the localities where the product is placed or the service is delivered.

Finally, the adoption of the Code founding values is coherent with the company's first social mission: the value creation that guarantees durability and development. The profit, meant as remuneration for the business risk and for the factors of production organization, does not contrast the ethical values of reference. On the contrary, there is a relationship of reciprocal functionality

within the two of them.

This Code considers as relevant the following stakeholders:

- Human Resources,
- Partners,
- Customers,
- Suppliers,
- Financial Institutions,
- Civil Community,
- Public Administration,
- Environment.

Universal Selecta aims to draw all the above listed subjects' attention to the Code, it commits to regular updating and preparation of the tools that will lead to its application.

To promote knowledge, sharing and divulgation of the set forth principles, the Company agrees to keep transparent, clear and open-to-dialogue relationships with the stakeholders.

2. HUMAN RESOURCES

The Human Resources are a crucial part for the success of a company. The ability of individuals and their degree of involvement constitute an intangible asset, which can't be reconstituted in a short time, and one of the most difficult competitive advantages hardly emulated by competitors.

The Code ratifies the commitment not to discriminate among the Human Resources because of the employment contract established, be it on a temporary basis or an open-ended one. Equal consideration must also be ensured irrespective of qualifications, business role and task being performed. Social relationships that are created and developed at construction site affect personal and emotional spheres of each individual. The contractor helps ensuring a peaceful business environment that encourages dialogue and discussion among the employees, in respect of the work duties and personal opinions.

Moreover, it is appropriate that working needs are reconciled with the personal ones, using the tools of available flexibility and taking advantage of new technologies.

Finally, we place particular emphasis on employee training, necessary tool for improving the effectiveness and

efficiency of the work, but also crucial to guarantee professional dignity of the employee within an "economic community" constantly evolving.

Universal Selecta undertakes:

- To pursue a responsible and consistent behavior even in critical situations, such as corporate restructuring and recessions;
- In vocational training activities;
- To promote internal communication through regular meetings, in order to gather requirements and proposals by all employees;
- To pursue a policy of equal opportunity in hiring, training, career, being inspired by the merit principle criterion in the management of relationships with staff;
- To avoid and disapprove forms of discrimination;
- To encourage a peaceful business environment;
- To promote a culture of safety, developing a risk-awareness, promoting responsible behavior on every part of the staff, in order to preserve health;
- To respect all cultures and religions, preparing actions that favour their integration into the company;
- To facilitate the staff in organizing the working time with the private time, using flexible instruments such part-time, hours account and other facilitating tools;
- To include in its corporate policies projects for the integration of disabled people into the labor market;
- To promote opportunities of meetings and gatherings among the staff even outside the workplace.

3. CUSTOMERS

The commercial fairness is the core principle that governs the relationship with customers.

It must implement all the necessary tools to understand their needs.

The selection of products and services must comply with the actual production capability and must be coherent with the real needs of the customer.

The trading relationship does not end with the delivery of the product or the service and the consequent payment of the amount.

Therefore it's advisable to seek dialogue and discussion with the client even in

the post-sale. The customer expects consistent quality and continuity of production.

In order to maintain an honest, fair and respectful relationship, it is necessary to provide the customer some prompt information on all the facts that might affect the production or modify the commercial offer.

Finally, the company commits to protecting the principle of competition, not adhering to cartels or consortia which may affect the free market.

Universal Selecta undertakes:

- To offer services and products whose quality is assured and whose modes of production are in compliance with industry regulations;
- To encourage dialogue in all possible forms and prepare listening channels, such as a phone number or an email address, to receive any proposals, needs and demands;
- To make economic proposals to customers that, despite the competitive dynamics, retain the characteristics of transparency and consistency;
- To verify the satisfaction of the customers and process the resulting data for continuous improvement of product and service;
- To inform the customers about all corporate events that can impact on them.

4. SUPPLIERS

The principle of fair trade is the basis of the relationship with suppliers, too.

The continuous search of maximum efficiency, competitiveness and the improvement of the products and the business success, is not possible without a strong partnership.

The price should not be the only parameter to be considered.

Ethical behavior, fair trade, transparency, the environmental impact of products and production processes are variables to consider when choosing a supplier as well.

The supplier plans its production also based on the performance of our business.

An honest and fair business relationship requires, therefore, the activation of channels through which to exchange

timely information on all the facts that could compromise our application or modify our purchasing power.

Finally, the company commits to protecting the principle of competition, not adhering to cartels or consortia which may affect the free market.

Universal Selecta undertakes:

- To comply with contractual agreements;
- To select and monitor suppliers on the basis of assessments related to the criteria of economy, efficiency, opportunity, quality, ethical behavior, avoiding prejudice and discrimination;
- To communicate to companies that offer themselves as potential suppliers the selection criteria and the outcome of the assessment carried out;
- To issue orders and contracts in a clear and transparent way;
- To verify the satisfaction of its suppliers and process the resulting data for continuous improvement of the relationship;
- To inform the suppliers of all corporate events that can impact on them.

5. CIVIL COMMUNITY

The relationship between business and the community is characterized by the relationship that develops on one hand with the Territory and on the other with the Associations.

The company interacts with and affects in a strong way the local context in which it is inserted, its operational and commercial vocation, its success and development. Economic activity gives impetus to the emergence of new initiatives, triggering a process of widespread entrepreneurship. Likewise, the creation of economic districts, relocation, internalization and outsourcing are phenomena that involve the territory, generating stresses to which the community must respond and adapt.

It is appropriate that the community is promptly informed about the relevant facts of their economic and participating in the definition of strategic choices.

The company is also itself a community, the bearer of interests, values and culture. So, it must confront with

other associations and institutions, contributing to the dialectical relationship necessary for the proper functioning of any representative democracy.

Universal Selecta undertakes:

- To develop the awareness of the role of business in the local community;
- to dialogue with movements, associations and institutions, sources of ideas and incentives to better understand the needs of the civil society;
- To promote the comparison between corporate culture and social consciousness;
- To participate actively in the life of trade associations, aware of the importance of the dialogue with other entrepreneurs and "representative democracy";
- To communicate promptly and timely the relevant events to the business community.