



Control Cables & Systems

Cofle S.p.A. Code of Ethics

Article 1 - PREMISE

The Code of Ethics of Cofle S.p.A. (hereinafter nominated The Code) can be defined as the company's "constitutional charter", a bill of rights and duties defining the ethical and social responsibilities of every person within the organization. This code of Ethics outlines the obligations and ethical responsibilities expected from the company's collaborators as they carry out their various activities, with due regard for the legitimate interests of all associates, collaborators, customers, partners and the local communities where Cofle operates. With this Mission, we at Cofle make our intentions clear: a common aim in the activity of all individuals and groups who co-operate within the organization and manage relations outside the company.

The Code's specific job is to encourage and guarantee that all transactions and interpersonal relations inside and outside the company are carried out correctly and fairly, thus increasing the company's credibility at a national and international level.

All Recipients of The Code are required to carry out their tasks and responsibilities in full respect of the values, principles and regulations set out in said Code.

Article 2 – BEHAVIOURAL PRINCIPLES

Integrity, transparency, honesty and correctness are integral to Cofle's activity.

In particular, at Cofle we:

- ✓ pursue excellence and competitiveness in the market, offering our customers products and services which satisfy their requirements and needs;
- ✓ assure our stakeholders that the company is transparent in its business activities, preserving that confidentiality which is required in all business transactions, and protecting the competitiveness of the company's activities; this is the reason why all Recipients of The Code are required to guarantee the highest confidentiality concerning all information acquired or elaborated while carrying out their work;
- ✓ undertake to promote fair competition, as a guarantee for all customers and stakeholders;
- ✓ avoid and deplore any resorting to illegitimate or unfair behaviour in order to reach given financial targets, which are to be pursued solely through the company's performances concerning innovation, product quality, and economical, social and environmental sustainability.
- ✓ safeguard and value the human resources we employ;
- ✓ strive to respect the principle of equal opportunities in the workplace, with no distinction between sexes, marital status, sexual orientation, religion, political or trade union preferences, skin colour, ethnicity, nationality, age, physical ability;
- ✓ pursue and sustain the protection of internationally established human rights;
- ✓ use our resources responsibly, consistent with the aim at creating sustainable development while respecting the environment, the health and safety of our workers and the rights of future generations;
- ✓ do not tolerate any kind of corruption of public officials, or of any other party, in any way, shape or form, not even where this kind of practice is generally accepted, tolerated or not punishable by law. Gifts may be offered to customers and to other people in full respect of the law and on the condition that such gifts are normal (for example: Christmas presents) or where they are appropriate, and have a value of below 50 Euros. Even during festive periods, Cofle employees must not accept gifts or other benefits connected to their professional activity unless they are of modest value (less than 50 Euros). Any Cofle employee who directly or indirectly receives requests or offers of gifts or benefits over said value, must have the authorization of his manager or direct superior or, in their absence, of the Governing Board. The direct managers of the various offices must verify that their collaborators abide by this rule;
- ✓ safeguard and protect the company's property and finances, where necessary adopting tools for the prevention of phenomena such as misappropriation of funds, theft and fraud to the detriment of Cofle;
- ✓ deplore the pursuance of personal interests and/or the interests of third parties, to the detriment of social interests;
- ✓ respect the laws of the lands where we operate and commit to assuring that those laws are respected within our company;

Articolo 3 – STAKEHOLDERS

Cofle pursues sustainable and lasting growth with the aim at reaching an equal balance of expectations from whoever interacts with Cofle.



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Shareholders

Utmost transparency is the key to Cofle's relations and dialogues with our shareholders, in full respect of the principles of accuracy, timeliness and parity of access to information, and with the aim at guaranteeing that Cofle's performance is evaluated correctly.

Environment

We carry out our business while fully respecting the environment and the health and safety of everybody working in Cofle. In the company we manage our activities with the aid of a system for controlling the environment in conformity with regulation ISO 14001 and certificated by a Third Party Authority, adopting methods and production technologies aimed at reducing waste and conserving natural resources.

Customers

At Cofle, our intention is to provide our customers with products which fulfil their requirements and satisfy their needs, by responding to them promptly and competently and behaving in a way which assures correctness, courtesy and collaboration.

Human Resources

At Cofle, we recognize that our human resources play an important central role in reaching the company's targets. We are aware that the main factor in a company's success comes from the professional contribution of the people who work in that company, in a context of mutual loyalty and trust. Cofle safeguards health and safety in the workplace, both by applying management systems which are being continuously improved, and through a health and safety culture based on prevention, and also on the need to effectively manage professional risk factors. Cofle deems fundamental the respect of workers' rights when carrying out our business activities.

Suppliers and external collaborators

Our suppliers and external collaborators play an extremely important role in improving the company's performance and competitiveness. Relations between Cofle and our suppliers and external collaborators are based on loyalty, transparency and impartiality. At Cofle we require our suppliers and external collaborators to respect the principles and regulations set out in this Code.

External community

Cofle's relations with local, national and supranational authorities are inspired by full and active collaboration, transparency, respect for each other's mutual autonomy and for the values contained in the Code. Cofle does not give out contributions, benefits or other advantages to political parties or trade unions, or to their representatives or candidates, except where applicable by law.

Competitors

Cofle recognizes that correct and loyal competition is a fundamental element for a company's development and for the market, and we manage our business while promoting competition based on our products' innovation, compliance and performance. Cofle and all our employees must restrain from disloyal business practices and the belief that they are to Cofle's advantage can never in any way justify the use of any behaviour which goes against the principles contained within this Code.

Article 4 – RESPECTING THE CODE

Cofle requires all Recipients of the Code to behave according to the general principles set out herein. All Recipients of the Code are obliged to abstain from any behaviour which goes against the principles within the Code. Cofle undertakes to use policies/procedures, instructions aimed at assuring that the values contained in The Code are reflected in the actual behaviour of Cofle, our employees and our collaborators. Any violation of the principles contained in The Code can be considered a breach of the obligations required in the work and/or contractual relationship, and sanctions may be taken against the those who commit such breach, as prescribed by the law, by collective agreements or by contracts.

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