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1. Scope

The present Code of Ethics stresses the high principles and values which NSC intends to affirm and follow regarding all the activities which sublimates in its existence and activity.

The essence of the Code of Ethics are the expression of the cardinal points of the Rights to which the Company must always adhere and identify. Nonetheless, they are to be considered as the expression of the values of the Ethics and fairness of the Company and the Activity to which NSC desires to inspire its own action.

2. Application

All relationships through which the existence and activities of the Organization express.

3. Normative References

- UNI EN ISO 9001 I.e.
- UNI EN ISO 14001 I.e.
- OSHAS 18001 I.e.
- Laws in force.
- NSC Integrated Management System Manual.
- Crime and Offence prevention system NSC document.
- Data processing privacy document.

4. Definition

For the purposes of this document, the terms, acronyms and definitions applied are the same set out in the Integrated Management System Manual NSC.

5. Responsibilities

The responsibility of this document CE is of Board of Directors.

6. Code**6.1. Lao-Tzu's Moral Code**

Righteousness is the power to take a decision without delay.

Courage is doing what is right.

Kindness is respect for others.

Sincerity is expressed without disguising their thoughts.

Detachment from things: it is an action done without personal profit.

The Honor is keeping his word.

The Duty of Loyalty is to live, but also to die for an ideal.

Modesty is talk about himself without pride.

Respect: without respect no trust can be born, without trust no teaching can be given or received.

The Self-Control is knowing how to silence his anger.

The Friendship is the purest of human feelings.

6.2. Preface

The present Code of Ethics stresses the high principles and values which NSC intends to affirm and follow regarding all the activities which sublimates in its existence and activity.

The essence of the Code of Ethics are the expression of the cardinal points of the Rights to which the Company must always adhere and identify. Nonetheless, they are to be considered as the expression of the values of the Ethics and fairness of the Company and the Activity to which NSC desires to inspire its own action.

The principles and values that embody the Code of Ethics and the behavioral rules in which they materialize are constantly pursued and respected throughout the life of the Company as well as any situation the Company itself is called upon. Therefore it is the firm desire of NSC to make aware its own Administrator, its workers, collaborators, providers and clients of the content and spirit of the Code of Ethics so that everyone concerned be its interpreter and divulger.

The Code of Ethics is the essential component of the organizational and gestational model capable of preventing offenses, according to the crime and offence prevention laws, which concerns the administrative responsibility of the juridical persons of Societies, Companies and Associations.

The Internal Control Committee due to control the Activity System for the Crime Prevention- adopted by NSC has the aim to flawlessly carry out and innovate the contents of the Code of Ethics in parallel with the evolution of the normative complex and changes within the sphere of the Company objectives activity.

The violations of the Code of Ethics are prosecuted and sanctioned in accordance with the law, work-contracts and disciplinary System hereby adopted.

6.3. General principles

Having in mind, as the main goals, the profit and the economical growth of the Company, the NSC guarantees the assurance-protection of honesty values, correct behavior, integrity and reciprocal respect.

Every Company decision making is deeply and only animated by pure competitive logic.

NSC rejects any abusive practice, be it elusive or collusive.

NSC harmonizes its activity as well as its role with the socio-economic realities with which it's expected to interact. However the social, economical and cultural specific characteristics of the domains in which the Company operates may not constitute a motive of disregard of the values being sought.

NSC refrains from aiming at unethical goals, does not use dishonest means in order to reach personal targets and the imprint of its activity is the respect of the laws present in the Countries in which it operates; and this applies to the relationship with the Public and/or private Organizations. The same applies to the collectivity and the working force, to the protection of the environment, territory, safety and hygiene related to work.

NSC uses any modality for the purpose of avoiding any unjust damage caused by its activity.

NSC adopts procedures aimed at the creation and realization of decision, the managing of the resources, the control steps for assuring that the action/decision be legitimate, veritable, coherent, suitable and documented.

Any decision regarding the management of the Company is adopted in acquiescence of the distributed adequacies and related foreseen authorizations.

The persons who intra or extramurally exercise their activities ought to adhere their own organization, actions and principles to the content of this Code of Ethics with concrete and constant respect.

6.3.1. Impartiality

Regarding decisions capable to exert influence upon the relationship with clients, the managing of the staff or the work organization, the selection and managing of the suppliers and the rapport with the surrounding community, NSC declines every discrimination based on age, sex, sexuality, health status, race, nationality, political opinions as well as religious beliefs.

6.3.2. Honesty

The NSC collaborators, within the parameters of their professional activity, are expected to diligently respect the Law, the Code of Ethics and the internal rules.

6.3.3. Confidentiality

NSC warrants the information confidentiality in its possession and does not try to obtain confidential data excepting cases in which the existence of expressed authorization in accordance with the existing laws is in force. Furthermore the NSC collaborators are supposed to avoid the utilization of confidential information for reasons not connected with the carrying out of their own activities.

6.3.4. Human resources value

The NSC collaborators are an essential factor for its success. Therefore NSC protects and promote the human resources value in order to improve and enrich the quality and the preeminence owned by every collaborators, in compliance with current legislation on personal rights of each individual, with particular regard to the moral and physical integrity of the staff, in working conditions that respect individual dignity and safe working environments and healthy.

Therefore, requests or threats aimed at inducing people to act against the law and code of ethics are not tolerated, or to engage in behavior and moral beliefs and personal preferences of each.

NSC agrees not encourage cronyism and nepotism, and not to establish any relationship of working with persons involved in terrorism.

The staff is hired solely on the basis of regular employment contracts, not tolerated in any form of illegal work. The candidate must be made aware of all the features pertaining to the employment relationship.

Recognition of wage increases or other incentives and access to roles and senior positions (promotions) are linked, as well as the rules established by law and the collective bargaining agreement, the individual merits of the employees, including the ability to express organizational behaviors and skills geared to the ethical principles of the Company's reference, indicated by this CE.

6.3.5. Authority fairness

Regarding the management of the contractual rapports concerning hierarchy relationships - particularly with the collaborators - it's NSC policy to act in such a way that the authority is carried out with fairness and respect avoiding any misapply.

NSC makes also sure that the authority does not transform itself into an exercise of power able to damage the dignity and independence of a collaborator, and that the chosen organizational decisions about the work do protect the values of the collaborators.

6.3.6. Information transparency and completion

The principle of transparency is based on the truthfulness, accuracy and completeness of information both inside and outside the Company.

While respecting the principle of transparency, all operations and transactions must be correctly recorded, authorized, verifiable, legitimate, consistent and appropriate.

All actions and operations must be adequately recorded and it must be possible to verify the process of decision, authorization and performance.

Each operation must be adequately documented in order to be able, at any time, to make controls to certify the characteristics and reasons for the operation and identify who authorized, performed, recorded and verified the operation itself.

The Company uses objective and transparent criteria for the selection of suppliers. This choice, in compliance with current regulations and internal procedures, must be based on objective assessments of competitiveness, to the quality and practiced economic conditions.

The supplier will be selected in consideration of the ability to ensure:

- compliance with the CE;
- implementation of adequate quality systems of the Organization, if any;
- availability of means and suitable organizational structures;
- compliance with legislation relating to employment, including matters relating to child and women labor, health and safety of workers, trade union rights or otherwise of association and representation.

Specific functional procedures documentation of the overall process of selection and purchase are planned, in order to ensure maximum transparency of the assessment and choice of supplier.

The NSC collaborator are expected to give complete, transparent, comprehensible and accurate information, in particular when it comes to formulation of contracts; NSC places high priority in specifying in a clear and comprehensible fashion every details to the buyer.

6.3.7. Persistent attention and accuracy as to the execution of duty and contracts

The contracts and the work- duty must be executed according to what it has been established by the interest party.

NSC shall not take advantage of lack of knowledge situations or capacity shortcomings eventually present in the counterparts.

6.3.8. Correctness and fairness regarding management and eventual contract renegotiation

It is to be avoided the occurrence when anyone acting on behalf of NSC attempts to take advantage of contractual loop-holes or unforeseen happenings with the aim of renegotiating the contract in order to take advantage of the new position of weakness in which the contracting-party finds himself.

6.3.9. Services and products quality

NSC orients its own activity towards the satisfaction and protection of its clients by taking into consideration their requests which might produce an improvement of the services and products, always in full respect of the self-imposed rules like the certification ISO 9001 last edition.

6.3.10. Disloyal competition

NSC protects the loyal competition value keeping away from collusive, disparaging, behaviors and from committing "dumping" activity.

6.3.11. Privacy protection

NSC is committed to protecting the privacy of the addressee, in compliance with current regulations, in order to avoid communication or disclosure of personal data without informed consent of the person concerned.

The acquisition and processing, as well as the storage of information and personal data of staff and other parties of the Company has the data takes place in compliance with specific procedures designed to prevent persons and / or unauthorized entities may become aware. That procedures shall comply with applicable regulations.

6.3.12. Responsibility towards the collectivity / environmental protection

NSC, certified ISO 14001 last edition, has the intention of carrying out its activities in full respect of the ambience with high heed towards the local and national communities in view of the fact that NSC desires to protect the environment being it a primary gift of nature.

Therefore NSC plans a procedural set-up in order to acquire an harmonious equilibrium between the economical initiatives and the environmental necessities. In this contest it strives to minimize the ambience impact, to prevent risks for the population (in adherence to the applying laws) keeping also in mind the scientific developments and the new technologies.

6.4. Conduct general criteria

6.4.1. Information handling

NSC handles critical information with total respect and privacy for the benefit of the interest parties. For this purpose specific policies and procedures are applied constantly updated to protect information, in particular NSC:

- activates an organization for treating any information capable to assure the correct separation of the role and the responsibility;
- classifies the information according to its critical level adopting adequate countermeasures at any situation phase;
- induces any third party involved in the handling of the information to subscribe to the basic privacy code

6.4.2. Confidentiality

NSC assures the information confidentiality in its possession and refrains from seeking confidential data, except in cases where express and informed authorization and compliance with applicable legal standards. In addition,

NSC staff is required not to use confidential information for purposes unrelated to tasks of its activity, as in the case of market manipulation.

6.4.3. Gifts, presents and benefits

Any form of gift that can be interpreted as a way of exceeding the normal commercial or courteous practice, or at any rate as a mean for acquiring special favors during the management of any activity connected with NSC is in absolute not approved or tolerated by NSC. In particular, any type of gift to public Italian or Foreign officers or to their relatives capable to undermine the independent judgment or to obtain any kind of advantage is totally forbidden.

This norm, which is not germane to any exception even in those Nations where valuable gifts to commercial partners is a way of life, applies to gifts either promised, or offered, or received; it's hereby stressed that the diction "gift" is intended as any kind of benefit (gratis attendance to Conventions, acquisition of a job, etc.). In any case NSC refrains itself from activities not approved by the law, by the commerce ethic and Code of Ethics - if known- by the Companies or Agencies which NSC has connection with. The NSC collaborators who might receive presents or benefits are expected, according to the established procedures, to make NSC aware of, which in turn will evaluate the appropriate ethical value and make the sender aware of the NSC's policies on this subject.

Furthermore the Code of Business Conduct (CDC), attached to this CE, must be respected by each manager, employees of all levels and supervision.

6.4.4. External communication

Any communication activity upholds the laws, the rules, the professional conduct, and is realized with transparency, clarity and promptness, protecting price-sensitive information and the industrial secrets.

6.5. Conduct criteria about relationship with collaborators

6.5.1. Personnel selection

The evaluation of the personnel to hire is carried out on the basis of the credential-profiles of the candidates compared to those expected by the NSC parameters, always adhering though to the equal opportunity for all the interested candidates.

The requested information is strictly connected with the aspects set forth by the professional and psycho-attitudinal profile, still respecting the privacy and the opinions of the candidate.

The personal function, within the limits of the available information, takes appropriate measures with the scope to avoid partialities, nepotism or client-connected preferences during the selection- hiring phases (e.g. avoiding that the "selector" be somehow a relative of the candidate).

6.5.2. Work rapport constitution

The personnel is hired with a regular job-contract; any type of irregular work is not tolerated.

Upon establishing a work contract every collaborator is informed about:

- characteristics of the activity to be carried out
- norms and retributions elements as per rules spelled out in the national collective work contract;
- procedures and rules to be adopted in order to avoid health risks during the job activity.

The minimal conditions spelled out in the collective work contracts and the norms regarding "hiring", discipline of the individual work contracts are all adhered to. Labor Unions rights are protected and any type of discrimination is forbidden. All these information are submitted to the hired person so that the acceptance of the job is based upon an efficient comprehension.

6.5.3. Personnel management

NSC avoids any kind or form of discrimination towards its employees. In regard to the management processes and personnel development, as well as during the selection phase, the decisions are based upon the harmony between the expected profiles and those shown by the collaborators (e.g. in case of promotion or transfer) and/or upon merit consideration (e.g. incentive-allotment on the bases of acquired results).

Access to roles and encumbrances is decided upon according to competence and ability consideration.

Furthermore in harmony with the general efficiency work, certain flexibility in the work organization granting privileges during the period of maternity and in general in the care of children are favored.

The evaluation of the collaborators/employees is carried out in a wide fashion involving the responsible elements, the personal function and, whenever possible, the elements which have become a part of the relationship with the person under consideration.

Within the limits of the available information and the privacy protection, the personal function operates in order to prevent episodes of nepotism (e.g. by excluding hierarchy conditioning between collaborators related to each other).

6.5.3.1. Personnel policies distribution

The personnel management set-up is available to all collaborators through the instruments of Company Communication (organizational documents and communication of the responsible ones.

6.5.3.2. Resources valorisation and training

The responsible parties fully utilize and value all the professionalism acting in the structure through the activation of the available elements in order to enhance the development and the growth of the collaborators (e.g. job rotation, assistantship with expert personnel, experiences directed towards duties of major responsibility).

In this contest it becomes highly important the responsible parties informative-communication as to the strong and weak points of the collaborators so that the latter can work for improving his/her own knowledge through a targeted goal.

The goal is assigned to groups or single collaborators on the basis of specific requirements of professional development.

The shaping process route of every collaborator is carefully stored for the purpose of detecting the degree of formation attainment and for planning further formative routes.

6.5.3.3. Work time management of collaborators

Every responsible party is expected to evaluate the work-time of the collaborators requesting activities coherent with their jobs and with the organizational plans of the work. The request of personal favors or any attitude display that can be configured as violation of the present code of ethics constitutes authority position abuse.

The Code of Business Conduct (CDC), attached to this CE, must be respected by each manager, employees of all levels and supervision.

6.5.3.4. Collaborators involvement

The collaborators involvement during the carrying out of the work is approved, together with periods of discussion participation and functional decisions for the accomplishment of Company objectives.

The collaborator ought to partake in such situations with cooperation spirit and unbiased judgment.

Listening to the various points of view, compatible with the Company requirements, allows the responsible person to formulate the final decisions; the collaborators must, at any rate, always actively aim at the realization of the pre-formulated activities

6.5.4. Actions upon work organization

Whenever work reorganization is called upon, the value of human resources is protected although, when necessary, actions of formation and/or professional re-qualification are set up.

NSC adhere, therefore, to the following criteria:

- the work re-organizational burden must be distributed in a uniform fashion among all the collaborators in coherence with the efficient activity of the Company;
- if new and unforeseen events occur, which must be clearly explained and analyzed, the collaborator may be assigned to a different role as opposed to the previous one, provided that his/hers professional qualifications are protected.

6.5.5. Occupational health & safety

NSC, certified OHSAS 18001, consolidates a safety culture stressing the risk knowledge, promoting sense of risk responsibility among all the collaborators; and besides it acts in order to preserve, through prevention, the workers safety and health.

The NSC objective is to protect, from the patrimonial and financial point of view, his workers by constantly searching the necessary combined action not only within the Company but also with the suppliers, cooperating Companies and clients involved in its activity.

For this purpose NSC has privileged:

- healthiness of work places
- introduction of an integrated gestational system regarding risks and safety
- an ongoing analysis as to risk, procedural criticism and resources to be protected
- input of concrete interventions and communication
- adoption of ongoing measures of control.

On health and safety at work, the NSC staff must, in particular:

- take care of their health and safety and that of other people in the workplace, who incur the effects of his actions or omissions, according to the training, instructions and equipment provided by the employer;
- contribute, together with the employer, managers and supervisors, fulfill their obligations under occupational health and safety in the workplace;
- observe the provisions and instructions given by the employer, the managers and the supervisors, the purpose of collective and individual protection;
- properly use work equipment, dangerous substances and preparations, means of transport, as well as the safety devices;
- appropriately utilize the protection devices supplied to him;
- immediately report to the employer, manager or person in charge of the deficiencies of the equipment as well as any threatening condition which it has knowledge, acting directly, in urgent cases, within its powers and possibilities, and without prejudice to the obligation of the following point, to eliminate or reduce situations of grave and imminent danger, informing the workers' representative for safety;

- do not remove or modify without authorization, the safety devices, signaling and control;
- arrange for care of personal protective means at its disposal, without any modifications on its own initiative and pointed out any defects or drawbacks to the employer or manager or person in charge;
- not accomplish on their own initiative operations or maneuvers that are not within its competence or which may compromise their own safety or that of other workers;
- participate in training programs and training arranged by the employer;
- undergo the health checks required by law or otherwise ordered by the Company doctor.

6.5.6. Anti-money laundering, receiving stolen goods

Personnel shall take all means and appropriate safeguards to ensure the transparency and fairness of commercial transactions.

In particular, it is mandatory that:

- the tasks conferred to any companies and / or individuals that treat the economic / financial interests of the Company to be in writing, indicating the content and economic conditions agreed.
- the relevant departments to ensure the control of the regularity of the payments took place against all counterparts including by checking the coincidence between the person to whose name is on the order and the person who collects the sums;
- the check of the cash flows relating to the relationships (payments / intercompany transactions) with Group companies (including also foreign ones);
- they are scrupulously respected the established minimum requirements and requested for the selection of the bidders the goods and / or services that the Company intends to acquire;
- criteria for assessing the tenders are set;
- with reference to the commercial / professional reliability of suppliers and partners, you are requested and obtained all the necessary information;
- in case of conclusion of agreements / joint venture aimed at making investments, to ensure the utmost transparency.

6.5.7. Use of computer systems

The staff, in carrying out their professional activities, must use the tools and computer or telecommunications services in full compliance with current regulations (and, particularly, in the field of computer crimes, cyber security, privacy and copyright) and internal procedures.

In particular, to the staff it is prohibited:

- the unauthorized access to a computer or telecommunications system;
- unauthorized detention and unlawful distribution of access codes to computer or electronic systems;
- distribution of equipment, devices or programs aimed at damaging or interrupting a computer or telematics system;
- interception, prevention or illegal interruption of computer or electronic communications;
- damage to information, data and computer programs and computerized systems.

The staff is required to take carefully the provisions of corporate security policies, in order not to compromise the functionality and security of information systems; not to load software on corporate systems borrowed or unauthorized, just as it is forbidden to make unauthorized copies of programs, licensed for personal, corporate or third.

Personnel must use the computer and the computer tools made available by the Company solely for business purposes; consequently, the Company reserves the right to check the contents of your computer and the proper use of information technology in accordance with company procedures.

The staff is also obliged not to send e-mail messages that are threatening and insulting, that such linguistic expressions do not conform to the style of the Company, or otherwise inappropriate language and not to surf websites with indecent and offensive contents.

Furthermore the Code of Business Conduct (CDC), attached to this CE, must be respected by each manager, employees of all levels and supervision.

6.5.8. Privacy protection

The collaborators privacy is protected by adopting standards which detail the information gathered through the collaborator and the corresponding treatment and conservation modalities.

Any investigation on ideas, preferences, personal tests and in general the private life of the collaborators are excluded. Such standards include the prohibition (excluding the instances regulated by the Law) to communicate/ scatter personal data without the previous approval of the interested party and set forth the rules for the control of the norms for privacy protection.

6.5.9. Integrity and protection of the person

NSC protects the moral integrity of its collaborators and guarantees the right to enjoy worthy and dignified work conditions.

For this reason it protects the workers from instances of psychological violence and it's in open contrast as to any sort of discrimination or attitude offensive to the dignity of a person, convictions, preferences (e.g. nasty comments, threats, isolation, excessive verbal invasion, and persistent allusions).

Sexual offenses, attitudes or talks which might disturb the sensibility of a person (images exposition with explicit sex. references, allusions) are not tolerated.

The collaborators who believe of having been the object of offenses or discrimination related to age, sex, sexuality, race, health status, nationality, political opinions or religious belief, etc. may report the happening to the Company which will investigate and act according to the Code of Ethics. The disparity, however, is not to be considered discrimination if justified or justifiable on the basis of objective criteria.

The "modus operandi" is set up in such a way that periodical statistical analysis are carried out, so that the existence of discrimination against certain groups can/cannot be asserted; such analytical results acquire the attribute of informative-feeding at the disposal of the Company's executives functioning as audit set-up.

Furthermore the Code of Business Conduct (CDC), attached to this CE, must be respected by each manager, employees of all levels and supervision.

6.5.10. Duties of the collaborators

The collaborator must act loyally in order to respect the obligations stipulated in the employment contract and the provisions of the code of ethics, ensuring the required performance. The collaborator is required to report through the appropriate channels, any violation of the rules of conduct established by internal procedures.

6.5.10.1. Information management

The collaborator ought to be aware and enforce whatever is embodied in the Company procedures as to information certainty for the purpose of assuring their integrity, security and availability. He/she must work out his/her own documents through the use of a clear, objective and exhaustive language so that eventual controls by coworkers, responsible or external personnel can be carried out.

6.5.10.2. Conflict of interest

All the NSC collaborators must avoid situations where conflict of interests can result and avoid getting personal advantages from knowledge of business opportunities during the course of their own activities.

The following examples can be cause of conflict of interest:

- exercising a certain activity (administrator, counselor, function-responsible), having economical interests with providers, clients or competitors (possessing stocks, professional appointments, etc.) even through family members;
- taking care of rapports with providers and exercising work activity, even by a family member, with suppliers;
- accepting money or favors from persons or Companies who/which are or are about to start business with NSC.

In case the slight possibility of a conflict of interest should appear then the collaborator ought to inform his/her responsible, who, according to the set forth modalities, shall inform the NSC "audit function" which will singularly evaluate its effective value. The collaborator must, furthermore, inform about the activities carried out outside his/her work-time, provided they appear to be in conflict of interest with NSC.

6.5.10.3. Company's properties utilization

Every collaborators is expected to act diligently in order to protect the Company's property, through responsible actions and in conformity with the operative procedures regulating its utilization documenting, with precision, their use. Furthermore every collaborators must:

- utilize scrupulously and with frugality the properties being used;
- avoid improper utilization of the Company's property which can be cause of damage or efficiency reduction, or be in contrast with the Company's interest.

It is the responsibility of the collaborator to protect the Company's property entrusted to him /her.

6.6. Behavioural criteria regarding relationship with clients

6.6.1. Impartiality

NSC devotes itself to the rejection of discrimination towards its clients.

6.6.2. Contracts and communicaton to clients

The contracts and the communications to the NSC clients are:

- clear and simple, formulated with a language similar to the one usually used by the interest party
- adherent to the norms in force without using elusive or improper actions;
- complete and deprived of any loop-hole which could influence the client's final decision;

In addition it's the duty of NSC to rapidly forward any information concerning:

- eventual modification to the contract;
- eventual variations of the economy condition and modalities of service-supplying and/or products sale.

6.6.3. Collaborators behavioural style

The NSC behavioral style regarding the clients is based on availability, respect and courtesy, collaboration and high professionalism.

6.6.4. Quality Control and Customer Satisfaction

NSC assures adequate quality standard of the service and products on the basis of pre-defined levels and periodical monitoring of the quality obtained.

6.7. Conduct criteria related to the relationship with the providers.**6.7.1. Choosing the provider**

The system-processes are oriented towards the detection and acquisition of the maximum competitive advantage for NSC and promoting equal opportunity for every provider; all this is also based on the setting up of contractual and pre-contractual manners within the parameters of an indispensable and reciprocal loyalty, transparency and cooperation.

In detail, the NSC collaborators in charge of such processes should:

- not hinder anyone, possessing the required qualification, the opportunity to compete in the contracts stipulation, adopting, for the choosing process of the list of candidates, objective and documental criteria;
- make sure that every "auction" has sufficient bidders, e.g.: selection of a provider among many Companies.

For certain merchandise-categories, NSC has at its disposal a board of providers whose qualifying criteria do not constitute

an access barrier. NSC holds on the following requirements:

- documentation of availability regarding materiel and finances, organized structures, know-how, project resources etc.;
- existence of effective adoption of quality system (e.g. ISO 9000) whenever required by the NSC procedures.

At any rate, in the hypothetical situation where a supplier, while carrying out his activity for NSC, decide to adopt a behavioral attitude not adherent or in line with the general principles of this Code, NSC has the legitimate right to take the appropriate necessary steps till even precluding other collaboration opportunities.

6.7.2. Integrity and independence in relationships

At NSC the relationship with the providers are regulated by common rules and are constantly monitored by NSC Srl.

Financial and consultant contracts are hereby also included. The draw up of a contract with a supplier must always be based on rapports of extreme clarity, avoiding whenever possible, situations of dependence. Examples are hereby described:

- usually binding projects of long period with contracts of short periods necessitating ongoing updating with price revision, or consulting contracts without a suitable know-how transfer, etc. are to be avoided ;
- it is not recognized correct to induce a supplier to settle a contract unfavorable to him and letting him believe in a successive more attractive contract.

To assure the highest transparency and efficiency in the buying process, every Company offers:

- an adequate historical accountability of the decisions made
- preservation of all the information as well as the official auction and contracts concerning the periods spelled out by the legislative norms and recalled in the internal procedures of acquisition.

6.7.3. Protection of the ethical aspects regarding the supplying

With the desire to conform the providing activity to the adopted ethical norm, NSC subscribes favoring in particular situations social type requirements (e.g.: the presence of an Environment Management System).

6.8. Conduct criteria in the relationship with the collectivity**6.8.1. Environmental policy**

It is the intention of NSC to pursue objectives coherent with those connected with the environment handling.

With the aim to take advantage of all the possible cooperating energies deriving from the integrated quality-environment-health and safety Management System, NSC's definition of the environmental policy and its realization are carried out in a unitary and coherent fashion; this managerial action:

- defines the environmental policy and connected conceivable industrial development;
- elaborates the realizing guiding lines for environmental policy actuation;
- chooses the indicator-targets and assures the monitoring and control of the ongoing Company actions regarding the environmental impact;
- keeps track of the evolution process of the national and international environmental legislation;
- acts in harmony with agencies and institutions working in the environmental world;
- makes provision for having on its staff personnel able to confront duties and problems related to environment.

6.8.2. Environmental policy strategy and instruments

The NSC Srl environmental policy derives strength in its knowledge that the surroundings can represent a vantage competitive point in a market that constantly widens its confines, also expects improvements in the quality field and behavioral.

NSC strategy (certified according to the international standard ISO 14001) and directs its attention to the constant improvement of the environmental development, holds in its activity the reaching of investments which coincide with the basics of sustained development; in details:

- to encourage actions and attitudes whose core is to view the environment-variable highly strategic;

- a cyclic acquisition system of the environmental data, which assures the activities control in the contest of the various industrial functions;
- awareness and environmental training activity for the collaborators aimed at the internal divulgence of the initiatives capable to increase the knowledge and professionalism of the workers at large;
- programs for a rational use of renewable resources,
- keeping under control the use of non-expendable resources.

6.8.3. Environmental communication

On a yearly basis the results of the environmental policy and the harmony between the objectives and the obtained gains are scrutinized and reports given which elucidates:

- the most significant environmental happenings (e.g.: certification of environmental management system, adequate set-ups, voluntary agreements, initiatives of various types for the protection of the territory and environment);
- the most important environmental results (energy efficiency, development of renewable sources, water use, emission reduction, refuse, rubbish management, etc.)
- environmental budget (systematic compilation of the last five years data regarding the consumption of resources and expenditures, etc.) and the indicators (e.g.: analysis spread out in the determined time concerning the environmental activities).

NSC Srl believes that the dialog with the associations represents a strategic importance for a correct development of its own business; therefore it sanctions reply to the observations of all the associations and those elements which contributes to it.

6.9. Conduct criteria in relations with public bodies and subjects performing public functions or public services.

Any NSC activity in conjunction with Public Bodies of the Italian Country, European Community, Foreign States and with Subjects which exercise public functions is carried out in full respect of the Law or any other norm concerning the Company and the principles of respect and transparency.

NSC refrains from any kind of offer, promise or money donation or similar utility that might condition the duty of the office or service by a public official or someone in charge of a public service.

NSC refrains from any type of fraud at the expenses of Public Bodies.

NSC refrains from any type of fraud with the intent of getting contributions, financing, preferred loans, helps or other offers from Public Bodies.

NSC allots the contributions, financing, preferred loans, helps and other offers obtained from the Public Bodies to the pre-arranged goals in full respect of the conditions and use modalities.

The relationship of NSC with public Organization, political Party, Organizations, Committees and any other helping force whose activity is not identifiable with the Company's objectives are carried out in full adherence and coherence with the principles and content of the Code of Ethics.

The contributions to Public Organizations, political Party, Organizations and Committee is done in full respect of the norms and laws in force.

6.9.1. Administration, accounting and finance

The respect of the procedures for programming, regulating and controlling the set up and realization of the Company's decisions are fully protected and guaranteed.

The observance of the procedures aimed at programming, regulating and controlling the management of the Company's financial resources is assured.

NSC takes care in an ordinate and complete fashion the preservation of the documentation concerning its own activities.

The personnel is supposed to act in such a way that the management activities are correctly and completely presented in the laid down documentation.

Every management activity is recorded and documented for the purpose of allowing its chronological reconstruction as well as an easy, complete check.

The Company's accounting is kept in respect to the norms and regulatory principles.

NSC observes all the norms, principles and procedures able to show a correct and complete economy, patrimonial and financial situation of the Company as well as the Group it could belong to.

NSC assures the truthfulness, honesty, and completion of the budgets, relationships, social communications, prospects and any other documentation related to the Company's economical, patrimonial and financial situation.

NSC holds itself away from any conduct or attitude that might cause an obstacle to controls and revisions.

NSC respects the Civil Code parameters related to Societies and Consortiums.

6.10. Implementing and monitoring compliance with the Code of Ethics

6.10.1. Tasks of Internal Control Committee

The monitoring of the implementation and observance of the Model and the Code of Ethics is entrusted to the Internal Control Committee. The tasks of the Internal Control Committee are, among others, the following:

- monitoring compliance with the Model and the Code of Ethics, in order to reduce the danger of the commission of offenses relating to the applicable laws;

- making comments about both the ethical issues arising in the context of business decisions, both to alleged violations of the Model or the Code of Ethics of which they become aware;
- providing to stakeholders, all the clarifications and explanations required, including those relating to the legitimacy of a specific behavior or conduct, that the correct interpretation of the provisions of the Model or the Code of Ethics;
- following and coordinating the updating of the Code of Ethics, including through its internal proposals for changes and / or updates;
- promoting and monitoring the implementation, by the Company, communication and training activities on the Model and, in particular, the Code of Ethics;
- reporting to the competent corporate bodies of any violations of the Model or the Code of Ethics, proposing the sanction to be imposed and verifying the effective application of any penalties imposed.

6.10.2. Reporting requirements to the Internal Control Committee

The addressee are required to give prompt notice to the Internal Control Committee, if they are even aware of violations, even if potential violations, in the area of activities of NSC, of laws or regulations, the Code of Ethics, the internal procedures.

The communications to Internal Control Committee can be made, even anonymously, either by mail (at ResponsabilitaAmministrativaOdV@nsc-it.com) or in writing at: Internal Control Committee, NSC Srl, Strada Regina, 29 - 62018 Potenza Picena (MC).

In any case, the Internal Control Committee shall ensure that the person making the notification, if identified or identifiable, is not the subject of retaliation, discrimination or otherwise penalties, in order to ensure the confidentiality (except for the occurrence of any legal obligations that dictate differently)

6.10.3. Violations of the Ethics Code and sanctions

As for the various types of violations of the Model, including matters relating to the Code of Ethics, as well as the penalties and the procedure to contest the violations and imposition of sanctions, reference is made to the provisions of the disciplinary system adopted by NSC.

7. Documented information

- Annex 1 – Code of Business Conduct.