

Legislative Decree No. 231 of 8 June 2001 introduced, for the first time in the Italian legal system, a complex system of sanctions that configures forms of administrative liability of entities for the offences contained in the Decree committed in their interest or to their advantage by persons in senior positions or by persons subject to the direction of others. This is in addition to the criminal liability of the natural person who materially committed the offence.

Aware the need to ensure conditions of correctness, transparency and legality in the conduct of business and corporate activities, to protect its image and position on the market as well as the work of all the staff employed, I.Blu S.r.l. has adopted its own Code of Ethics and has defined and implemented an Organisation, Management and Control Model pursuant to Legislative Decree no. 231/01 (in short).

In addition to the above, I.Blu's Model consists of the set of procedures and control systems defined in the Integrated Quality, Safety, Environment and Social Responsibility System together with specific additional protocols attached to the Model.

The purpose of the Model is to:

- determine, in all those who work in the name and on behalf of the company, especially in the Risk Activities identified in the Model, the awareness that they may incur, in the event of violation of the provisions therein, an offence liable to penal and administrative sanctions, not only against themselves but also against the Company itself;
- reiterate that such forms of unlawful conduct are strongly condemned by the Company since (even if the latter were apparently in a position to take advantage of them) they are in any case contrary not only to the provisions of the law, but also to the ethical-social principles to which it intends to adhere in the performance of its mission;
- inform all those who work in any capacity in the name of, on behalf of or in the interest of I.Blu that the violation of the provisions contained in the Code of Ethics and the Model entails the application of appropriate sanctions or the termination of the contractual relationship;

Subject: **Declaration of knowledge and commitment
to comply with D.231/2001**

Company _____
 Tax Code/VAT no _____
 with registered office in _____ (Prov. _____)
 Via _____
 in the person of the legal representative _____
 born on _____ in _____
 Tax code _____

The legal representative under his/her own responsibility expressly declares:

- (a) that I am aware of the regulations in force concerning the Administrative Responsibility of companies pursuant to Legislative Decree no. 8/6/2001 No. 231 and subsequent amendments and additions;
- (b) to be aware of the provisions of the Organisation, Management and Control Model adopted by I.Blu Srl, as well as of the Code of Ethics published on the website: www.iblu.it and of the relevant system of special powers of attorney and delegation of functions;

- enable the Company, by monitoring Risk Activities, to take timely action to prevent or counteract the commission of Crimes and Offences.

I.Blu S.r.l. has also appointed a Supervisory Body to which it has entrusted the task of supervising the concrete implementation and effectiveness of the Model, as well as any opportunities to adapt it.

The Model provides for precise obligations to inform the Supervisory Board, which constantly monitors the actual implementation of the adopted Model and the operating procedures by means of periodic checks. Reports to the Supervisory Board may be sent by e-mail to the address: organodivigilanza@iblu.it or in hard copy to the address: **I.Blu S.r.l. via Alpe Adria n. 6 – 33010 Tavagnacco (UD)**.

The Company emphasises that the reporting obligation applies to all recipients of the Model, such as employees, para-subordinate collaborators, corporate bodies, external parties such as suppliers, customers, anyone who performs activities in the name and on behalf of the Company, partners in companies, consortia, temporary groupings of companies and any other party that has relations, also of an institutional nature, with the Company, subsidiaries and/or associated companies or companies or entities that are subject to the management and coordination of I.Blu S.r.l.

The Supervisory Board, as well as all persons external to the Supervisory Board who may have to cooperate with it, are bound by an obligation of confidentiality with regard to any information they may become aware of.

For the purposes of the adoption and effective implementation of the Organisation, Management and Control Model, training and information to all recipients of the same Model represents an indispensable tool to ensure that the principles of conduct that the Company wishes to adopt in its broader actions are disseminated as widely as possible and that it is possible for everyone to comply with them.

To this end, the Code of Ethics and Model 231 are published and available on the website www.iblu.it in the Responsibility - the Social Responsibility System section.

The Managing Director
Roberto Conte

- (c) to be aware that I.Blu Srl has set up a Supervisory Board that can be contacted at organodivigilanza@iblu.it

The Legal Representative under his own responsibility also subscribes to the following commitments:

1. The Supplier undertakes not to carry out and to ensure that none of its directors and/or employees and/or collaborators carries out acts and/or behaviours that may lead to a violation of the rules and regulations contained in the aforementioned Model, as well as more generally behaviours that could lead to the commission of the offences referred to in Legislative Decree 231/2001 and to adopt and implement, where necessary, appropriate procedures to prevent such violations.
2. The Supplier acknowledges (and, as far as necessary, authorises) that the Supervisory Body set up by I.Blu may request information directly from the company departments responsible for the activity referred to in the contract, in order to carry out its control activities correctly.
3. In the event of any breach of the obligations set out in the previous articles, I.Blu shall be entitled, at any time and without any prior notice, to suspend the performance of the contract for checks or to terminate the contract, with the right to claim compensation for all damages, arising out of or consequent to such breach.

Place _____ Date _____

**Stamp and signature
Legal Representative**