	Document name	DS 03_P02	Revision of Document No.	1
	description	code of ethics	First document release	01/07/2012
	Author	Arka Service - Quality	Last Review	02/12/2013
	Approved by	Presidency	Next revision	N.A.



ARKA Service srl Ethical Code of Conduct

Buttiglieria Alta (TO)



	Document name	DS 03_P02	Revision of Document No.	1
	description	code of ethics	First document release	01/07/2012
	Author	Arka Service - Quality	Last Review	02/12/2013
	Approved by	Presidency	Next revision	N.A.

Table of Contents

1. Introduction.....	3
2. General principles	4
3. Scope and target groups	6
4. Principles of conduct towards third parties	7
5. Principles of conduct in relations with staff	8
6. Principles of conduct in relations with national and international institutions and public administrations	11
7. Principles of conduct in relations with customers	12
8. Principles of conduct in relations with suppliers, contractors, consultants, agents, intermediaries and joint venture partners	13
9. System of internal control.....	15

	Document name	DS 03_P02	Revision of Document No.	1
	description	code of ethics	First document release	01/07/2012
	Author	Arka Service - Quality	Last Review	02/12/2013
	Approved by	Presidency	Next revision	N.A.

1. Introduction

The success of a company is also based on values such as transparency, credibility, loyalty, honesty, integrity, moral integrity and reliability. These are principles that represent the fundamental and indispensable heritage of a company: its reputation.

The principles that inspire ARKA Service srl's activities ("ARKA" or the "Company") are those of strict compliance with the law, fair competition and consideration of the legitimate interests of its stakeholders.

Any conduct, whether corporate or personal, must lead to these principles.

It is therefore important to clearly define the set of values that ARKA recognises, accepts, shares and applies at all levels, without distinction or exception.


For these reasons, the "Code of Ethics" has been prepared, (from now on: 'the code') to regulate the complex of rights, duties and responsibilities that ARKA expressly assumes towards its stakeholders.

ARKA identifies as impacted people or stakeholders all the directors, executives and auditors, employees, collaborators, temporary workers, labour agency workers, consultants, consultants, agents, intermediaries, contractors, joint venture partners, suppliers, customers, national and international public administration.

In this context, ARKA pays particular attention to the human factor: promoting the valorisation and professionalism of personnel, ensuring compliance with safety, workplace health and privacy protection and taking into account, wherever possible, the needs of individuals searching for a work-private life balance.

Careful and rigorous compliance with the provisions of this code is a fundamental and inspiring line of all activities and initiatives undertaken by the Company. Ethics orientation is an indispensable approach for ARKA's reliability in relations with stakeholders with whom the company deals, both in Italy and abroad. Introduction of certain specific principles of conduct, to be observed while dealing with the public administration, the market and third parties, is a manifestation of ARKA's commitment also in relation to the prevention of the crimes referred to in the legislation in Italy.

ARKA acts in compliance with the laws of the background in which it operates, with the laws of Universal Declaration of Human Rights and conventions of the International Labour Organization.

	Document name	DS 03_P02	Revision of Document No.	1
	description	code of ethics	First document release	01/07/2012
	Author	Arka Service - Quality	Last Review	02/12/2013
	Approved by	Presidency	Next revision	N.A.

2. General Principles

ARKA in relationship with the partners conforms its conduct to the general principles set out below, which are the foundation of the corporate culture consolidated over time.

Accuracy

To adopt a correct behaviour in relations with stakeholders, enhancing their willingness to engage in dialogue and confrontation.

Equity and impartiality

Avoid discrimination on the basis of age, health status, gender, religion, race, political and cultural opinions in relations with stakeholders. In summary, work in a fair and impartial way, adopting the same behaviour towards all the representatives with whom we come into contact, respecting their role.

Respect of human rights


Promote and respect universally recognized human rights and make sure to not even indirectly become complicit in abuses of this principle.

Privacy

To ensure the confidentiality of personal and sensitive data in its possession, in compliance with current regulations, while maintaining full and punctual compliance with security and data protection measures.

Human resources value

Protect the value of human resources as a fundamental element for its development. Human resources management is based on respect for the personality and

	Document name	DS 03_P02	Revision of Document No.	1
	description	code of ethics	First document release	01/07/2012
	Author	Arka Service - Quality	Last Review	02/12/2013
	Approved by	Presidency	Next revision	N.A.

professionalism of each individual. This implies constant commitment.

Support and training of the resources employed in the value creation process, both in technologically advanced and developing contexts.

Health and safety

Ensure the necessary prerequisites for creating and ensuring safe and healthy workplaces and to apply the laws and regulations relevant to the place of activity in order to prevent accidents and damage to health and to the environment.

Business activity

Operate in the management of the company with criteria of economy and efficiency to provide solutions of products and services with a high quality/cost ratio and achieve full customer satisfaction.


Ensure that operations or transactions are correctly recorded in the company's accounting system according to the criteria indicated by law and applicable accounting principles, as well as authorized, verifiable and legitimate.

Fair competition and against corruption

Protect the principle of fair competition by refraining from collusive and improper conduct and contrasting corruption and extortion in all their forms.

Technological innovation and quality

Follow technological developments in order to achieve the highest levels of quality of the services/products provided, respecting the standards and rules in this area as established at national, European and international level.

	Document name	DS 03_P02	Revision of Document No.	1
	description	code of ethics	First document release	01/07/2012
	Author	Arka Service - Quality	Last Review	02/12/2013
	Approved by	Presidency	Next revision	N.A.


3. Application field and beneficiary

The regulation disciplines ARKA's behaviour in the context in which it operates.

If a disposition of the regulation results in conflict with any internal disposition or procedure, the regulation prevails on this disposition.

The regulation addresses to: administrators, executives and auditors, employees, collaborators, consultants, agents, middlemen, contractors, external societies joint venture partners, suppliers and every other subject that might act or represent ARKA interests.

ARKA commits to use the adequate tools to divulge the present regulation to the quoted subjects, none excluded, and to perform the suitable actions to make it clear.

	Document name	DS 03_P02	Revision of Document No.	1
	description	code of ethics	First document release	01/07/2012
	Author	Arka Service - Quality	Last Review	02/12/2013
	Approved by	Presidency	Next revision	N.A.


4. Principles of conduct to third parties

The parties that operate in ARKA's name (as an exemplifying title but not complete: administrators, employees, counsellors, agents, middlemen, contractors and joint venture partners) must maintain an ethical behaviour, respectful of laws and regulations, based on the top correctness, integrity, transparency and in any case respectful of the principles present in this Regulation with the third parties.

They must acknowledge and respect scrupulously and integrally the following behaviour principles:

- fraudulent practices and behaviours, corruption, play favourites and more in general any conduct opposite to what stated by the law, by the sector regulations and to the internal regulations and to the present regulation are prohibited;
- the usage of any royalty that might be interpreted as exceeding the normal business or courtesy practices or that might be interpreted as aiming to acquire advantages are prohibited;
- any royalty usage to state officials or to Italian and not Italian public services and/or to officials of national, international and super national and/or to employees and/or private directors that are related to them in any way and that might influence the fair judgement of those third parties are strictly prohibited;
- it's strictly prohibited to propose, to try or to effectuate any corruptible act, always illicit or, in any case, unappropriated, done with the purpose to obtain advantage both for the person and the company to any State official or representative and/or any third parties, relative, friend, collaborator or associated of any title.
- it is strictly prohibited to use any external collaborator, consultant, agent or third part to propose, to try or to effectuate any corruptive act, always illicit or, in any case, unappropriated, done with the purpose to obtain advantage both for the person and the company to any state official or representative and/or any third parties, relative, friend, collaborator or associated of any title.

Those conducts are forbidden and will be strongly sanctioned regardless the fact that they were attempted or realized, directly or by third parties, to obtain personal advantages or to obtain advantages to the company.

	Document name	DS 03_P02	Revision of Document No.	1
	description	code of ethics	First document release	01/07/2012
	Author	Arka Service - Quality	Last Review	02/12/2013
	Approved by	Presidency	Next revision	N.A.

5. Principles of conduct in the relationship to the employed

In this regulation as “Employed” includes: administrators, counsellors, employees, and collaborators that signed the regulation.

To the provisional workers, ARKA assures the same rights as the employed even without requiring them to sign the present regulation as exempt from contractual obligations to the company.

ARKA commits to treat its personnel with dignity and respect, avoiding any form of moral and physical violence; commits to apply regulatory and retributive condition not inferior to those resultant from the collective contracts in force during the period of time and in the place of the activity; commits to fulfil the insurance obligations, welfare obligations, following the laws, the regulations and the norms in force in the place of the activity; commits to not use in the process of activities both directly and indirectly any person of age inferior to the one stated by the law in force in the place of the activity; commits to respect any legal obligation regarding the protection of female workers, granting equity of the sexes, prohibition of discrimination, abuses and nuisance, freedom of union, of association and of representation; to not use any form of forced work, done by the workers under the threat of any punishment or to which the workers didn't offer them self spontaneously.

Independence and privacy of worker selection

ARKA protects the equality of the sexes in the workers selection, through evaluations to verify the professional profile, respecting the private sphere and the personal opinions of the candidate.

Equity and participation in the work relationship


ARKA assures to respect the equity of the sexes in the management of the work relationship and assures the absence of discrimination in the workplace.

Every supervisor has to give value to the job of his resources requesting performances which are coherent with the assigned activities.

Requesting the subordinates personal favours or requesting a behaviour that states a violation of the present Regulation is considered an authority abuse.

ARKA's workforce, their abilities and dedication are an indispensable factor for the company's success.

Therefore ARKA protects and promotes the value of human resources, aiming to improve and enhance the personal knowledge and competences of every employee.

	Document name	DS 03_P02	Revision of Document No.	1
	description	code of ethics	First document release	01/07/2012
	Author	Arka Service - Quality	Last Review	02/12/2013
	Approved by	Presidency	Next revision	N.A.

The company supports the freedom of association and assures the complete absence of any kind of minor work forced and obliged.

Privacy Protection

ARKA aligns itself to the prescription on the privacy of personal data present in the regulation on the data privacy.

The company informs all personnel on the nature of the personal data being object of this treatment, on the treatment and communication procedures and will adopt the necessary measures to guarantee privacy.

Zeal and Honesty

The personnel has to act trustworthy and with honesty, respecting the contract obligations signed and guaranteeing the requested performance.

ARKA has to adopt the adequate tools to inform the workers about these dispositions and of the procedures, asking to follow them strictly.

Conflict of interests


ARKA has a relationship of trust and loyalty to its personnel that has to pursue the objectives and the general interest of the company performing their tasks, avoiding circumstances that can lead to damage ARKA's activities or that can determinate illicit situations advantaging their own company.

As an exemplifying title but not complete, the following situation might lead to such circumstances:

- performing working task for competitors;
- accepting money, gifts or favours from people, companies or associations that are in business or are managing trading with ARKA, that are exceeding common business or courtesy practices

Every situation that might lead to the conflict of interest has to be communicated immediately to the company, reporting it to the administration council.

Protection of the workplace and the work environment

	Document name	DS 03_P02	Revision of Document No.	1
	description	code of ethics	First document release	01/07/2012
	Author	Arka Service - Quality	Last Review	02/12/2013
	Approved by	Presidency	Next revision	N.A.

ARKA guarantees to expand and to reinforce the security knowledge, developing the risk knowledge, the respect of the norm in force and promoting responsible behaviours. It also operates to preserve the health and the safety of the workplace with preventive, technical and organisational actions.

ARKA, in the respect of the norm, guarantees to adopt the measures necessary to reduce the environmental impact of its activities also through the sensitization of its stakeholder.

Company asset protection

The personnel has to operate with diligence to safeguard the society assets, avoiding improper usage that might lead to damage or efficiency reduction or is in conflict with the company's interests.

It is his responsibility not only to protect the assets but also to prevent the improper usage in the advantage of third parties.

The personnel also has to:

- monitor that the company's security norms are respected also for the activities done by collaborators or third party societies that operate on ARKA's mandate.
- Use the company email and internet tools for authorized purposes and avoiding to send offensive, threatening and inadequate emails harmful to the company's image;
- not to navigate on illicit, immoral or non work related websites.


Data treatment

The information, data and knowledge taken, elaborated and managed by the personnel during work activities has to remain strictly confidential, conveniently protected and cannot be used, communicated or divulged, both inside or outside of the company if not under the respect of current laws and the company procedures.

The personnel has to observe the highest confidentiality level on information, documents, studies, initiatives, projects, contracts, plans, etc., known on the workplace with particular reference to those who can compromise the image or the interest of the clients and of the society.

ARKA enables the necessary measures to protect the information managed and to avoid that those becomes accessible to unauthorized third parties.

The norms stated also apply to auditors, agents, suppliers, consultants, contractors, joint venture partners and middlemen that are involved in the management of data and information gathered during the activities expected according to the contractual agreements with ARKA.

	Document name	DS 03_P02	Revision of Document No.	1
	description	code of ethics	First document release	01/07/2012
	Author	Arka Service - Quality	Last Review	02/12/2013
	Approved by	Presidency	Next revision	N.A.

6. Relationship with Institutions and public national, international and supranational administration's principles of conduct


ARKA's relationships with institutions, the public administration, the state officials or the state representative must inspire from the ideal of transparency, clarity, accuracy and to the strict observation of legal provisions and of the applicable regulations without compromising ARKA's integrity and reputation.

Engaging to any commitments and the relationship management with institutions and with the public administration are reserved exclusively to the company's authorized personnel.

Regarding the relationship between ARKA, institutions or the public administration, even without commercial purpose, the beneficiary of the present regulation mustn't:

- Offer, even through a middleman, any amount of money or other utilities that might consist in job or commercial opportunities to the State official, to his relatives or to any person that is linked to him;
- Research or establish personal relationship that might act as influence, inference, able to condition directly or indirectly the result of the relationship.

The courtesy and hospitality behaviour that belongs to the routine of the normal business and relationship conduct have to be coherent with what is reported in the "Principles of conduct to third parties" paragraph of this regulation.


	Document name	DS 03_P02	Revision of Document No.	1
	description	code of ethics	First document release	01/07/2012
	Author	Arka Service - Quality	Last Review	02/12/2013
	Approved by	Presidency	Next revision	N.A.

7. Principles of conduct in the customer relationship

The primary objective of ARKA is the fulfilment of the customers needs, aiming to the purpose of creating a solid relationship inspired by the general virtues of honesty, efficiency, decency and professionalism.

ARKA assures its customers the best execution of the agreements and is constantly oriented to propose advanced and innovative solutions in a perspective of integration, efficacy, efficiency and low costs.

The agreements signed with the customers and all the communications are based on the simplicity, clarity and completeness criteria, avoiding the usage of any unfair or deceptive practice.

	Document name	DS 03_P02	Revision of Document No.	1
	description	code of ethics	First document release	01/07/2012
	Author	Arka Service - Quality	Last Review	02/12/2013
	Approved by	Presidency	Next revision	N.A.

8. Principles of conduct in relations with suppliers, contractors, consultants, agents, intermediaries and joint venture partners

ARKA's conduct in the procurement of goods and services is based on the search for the maximum competitive advantage, the granting of equal opportunities of participation for each interested party, loyalty and impartiality of judgement.

There must be no undue pressure to favour one person at the expense of another, which would undermine the credibility and confidence of the Company.

ARKA is committed to require assurances from the parties involved in the selection process in regards to means, including financial, organisational structures, skills, know-how, quality systems and resources, appropriate to meet the needs of ARKA and its international customers.

In order to guarantee the integrity and independence of supply relationships, ARKA bases its purchasing process on the utmost transparency and efficiency, in particular by means of the following:


- the adoption of formalities suitable to adequately document the choices made;
- the retention of official information and documents regarding the offer or selection, as well as contractual documents, for the periods established by current regulations and referred to in the internal purchase procedures.

Assignment of professional tasks

ARKA is committed to adopt criteria for awarding professional assignments based on principles of competence, cost-effectiveness, transparency and fairness, as well as assessing the moral and professional integrity of the professionals to be involved.


More specifically, the fees and/or sums paid to the assignees of professional assignments must be adequately documented and proportionate to the activity carried out, also in consideration of market conditions.

Assignment of tasks to agents and intermediaries

	Document name	DS 03_P02	Revision of Document No.	1
	description	code of ethics	First document release	01/07/2012
	Author	Arka Service - Quality	Last Review	02/12/2013
	Approved by	Presidency	Next revision	N.A.

Same way as mentioned above, ARKA undertakes to adopt criteria for the conferral of tasks and mandates to agents and intermediaries inspired by the principles of competence, cost-effectiveness, transparency and correctness, also assessing the moral and professional integrity of the subjects to be entrusted.

ARKA is committed to implementing internal procedures so that the principles are effective and operational.

	Document name	DS 03_P02	Revision of Document No.	1
	description	code of ethics	First document release	01/07/2012
	Author	Arka Service - Quality	Last Review	02/12/2013
	Approved by	Presidency	Next revision	N.A.

9. Internal control system

Roles and responsibilities

The Internal Surveillance Team is an authority that must supervise the functioning and compliance of the Code.

It consists of individuals who possess the requisites of autonomy, independence, professionalism, integrity and respectability.

This Team must monitor the compliance with the provisions of the Code, its effectiveness in relation to the corporate structure and the opportunity for adjournment.

The internal surveillance team consists of:

- ARKA Service Management Committee
- Quality Manager(Internal Auditor).

Communication and training

The Code is brought to the knowledge of stakeholders through corporate communication tools and is disseminated to the recipients in the most appropriate manner for the purpose, including meetings and training materials.


Reports

The addressees of this Code may report an alleged violation of the Code to the Internal Surveillance Team, which will assess the report, also by consulting the sender, the person responsible for the alleged violation and each person potentially involved, undertaking to ensure the confidentiality of the identity of the reporter, without prejudice to legal obligations.

Reports made in good faith may not have negative repercussions to the detriment of the reporting agent even if they result in unfounded.

Disciplinary proceedings

The internal Supervisory Team is responsible for verifying and scrutinize any violations of the principles set forth in this Code and for transmitting the results of the investigations carried out to the Directors Board.

	Document name	DS 03_P02	Revision of Document No.	1
	description	code of ethics	First document release	01/07/2012
	Author	Arka Service - Quality	Last Review	02/12/2013
	Approved by	Presidency	Next revision	N.A.

Penalties

The Company, in relation to the seriousness of the illegal activity carried out by the defendant, will adopt the appropriate measures, regardless of whether or not the prosecution is carried out by the Judicial Authority. In particular, any violation of this Code, committed by employees and/or executives, will entail the adoption of disciplinary measures, proportionate to the seriousness or recidivism of the lack or degree of guilt, in compliance (in Italy, with the rules set forth in the article. 7 of Law no. 300 of 20 May 1970, "WORKERS STATUTE ") of the provisions contained in the applicable employment contracts.

With regard to directors, counselor and statutory auditors, the violation of the provisions of this Code may entail the adoption, by the Board of Directors and the Board of Statutory Auditors respectively, of measures proportionate to the seriousness or recidivism of the lack or degree of guilt. This until the revocation of the mandate for just cause to be proposed to the Shareholders' Meeting. In the latter case, ARKA shall be entitled to any damages suffered as a result of the unlawful conduct carried out.

As far as the other recipients called upon to sign the Code are concerned, the violation of the precepts included therein entails the adoption of measures proportionate to the gravity or recidivism of the lack or degree of fault, until the termination of the existing contracts with them. Also in this case, ARKA can claim compensation for the damages incurred as a result of such damage.

_____ ○ _____