

POETIC.01

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OPERATING PROCEDURE FOR THE ETHICAL CODE OF BUSINESS CONDUCT

PROVISION OF QUALITY

This procedure is

- ▶ Issued by the System of Quality Management

(Signature)

- ▶ Verified and approved by the CEO

(Signature)

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1 Purpose and applicability

The code of conduct that OCAM LTD presents to its employees, contractors, customers, suppliers and subcontractors has been written with the participation of all, in respect for the opinions, sharing aspirations and aims, above all, to safeguard the figures considered "weak" in processes and business operations.

This document collects a set of principles and rules of general and specific, which will be today and tomorrow for their cogency, the reference model in terms of Security and Protection of Health of all the works forces, including employees and subcontractors.

This document is therefore entrusted to the conscience of those who will put it in place and enforce it: so is due to the values of ethical and legal.

The principles of "Respect for Safeguarding" in the fullest sense will form the basis of every action and will be a reminder of the report without any other aspect, condition, personal or business interest.

Uniformity of aspiration and action by all is a key prerequisite for the affirmation of the identity of OCAM LTD.

OCAM LTD also intends, with this document, to publicize the principles and criteria by which decisions are made in health and safety at work.

A warm thank you to all those who constitute due diligence to lavish on every occasion and to disclose the principles contained here.

2 References

- UNI EN ISO 9001
- System Manual Quality Management MANQUA
- System Management of Work's Health and Safety (SGSL)

3 Responsibility

The role of the manufacturer in the department metallic structures is certainly one of the activities that are most at risk in the area. Attention, awareness, training of staff working in the yard has always been the primary mission of the property, together with the research and development of the specific activity. The area considered "poor" and represented by a strong competition still has favorably acknowledged the commitment of the company. The attention and the study of methods of organization, management and control of activities to ensure the safety and protection of workers, constitute a serious commitment to ensure that all activity serene and secured environment. For this reason, the company intends to implement procedures to verify that equilibrate working environment with working conditions appropriate to the factors that influence the activity. It follows that a worker who, for example, often work in the winter on sites such as disadvantaged will have the right to use a rest superior to operators engaged in some less exposed.

OCAM LTD has adopted the concept of the European Directive distinguishing the principle of "maximum security reasonably practicable" and that of "maximum security technologically possible", using the latter is equipped with the collaboration of experienced staff to achieve the objective in favor of workers.

Planning prevention becomes a warning that the company intends to pursue at all costs. For this plan to establish an adequate system of sanctions and a bonus incentive system, and lends credence to justify appropriate balance with each specific kind decision.

4 Working documents

- Letter of warning.

5 Operating procedures

5.1 Introduction

OCAM LTD is a company represented by worker-members, operating for over thirty years in the field of metal constructions mainly of industry, all over the country.

The company's activity combines the dimensional development and growth of profitability anchoring processes and methods to the Safeguarding of assets represented by the human resources for employees, partners and suppliers.

The company mainly playing a role of service as well as the manufacturer in the supply chain of the construction industry, organizes and focuses the work through roles and tasks projected in the pursuit of customer satisfaction.

The principles that underpin the activities are essentially and primarily paying attention to the respect of all labor force, their roles and tasks, risks arising from the expense and to the detriment of workers.

The succession of roles, looking for methods that will address labor organizations of repetitive and monotonous, are additional principles that the company believes the priority to ensure health and safety in the workplace.

5.2 The quality of relationships

OCAM LTD considers it essential to the pursuit of quality with its stakeholders including employees, contractors, agents, customers, partners, suppliers and consultants in order to fulfill the realization of its mission.

Function of code to manage the system security

OCAM LTD considers fundamental respect for the roles and tasks undertaken by its stakeholders including employees, contractors, agents, customers, partners, suppliers and consultants for the attainment of its mission. Everyone is called to the dissemination of the principles and even cultural characteristics of this Code of Conduct through the respect of their role and their job.

5.3 Compliance with standards

OCAM LTD considers fundamental respect for the roles and duties in compliance with the standards adopted by its stakeholders including employees, contractors, agents, customers, partners, suppliers and consultants which are an integral part of the contractual obligations.

5.4 Legality

In the performance of their professional stakeholders including employees, contractors, agents, customers, partners, suppliers and consultants they are required to strictly comply with the regulations in force in any case, the report will be brought to their advantage. The company will not tolerate or justify illegal or improper.

5.5 Integrity

In the performance of their professional stakeholders including employees, contractors, agents, customers, partners, suppliers and consultants they are required to run their own business without placing themselves in situations that are at the expense of the Company or OCAM LTD respectively the role of the other party, damaging the image.

5.6 Fairness

In the performance of their professional stakeholders including employees, contractors, agents, customers, partners, suppliers and consultants they are required to run their own business with objectivity and justice.

5.7 Impartiality

In the performance of their professional stakeholders including employees, contractors, agents, customers, partners, suppliers and consultants they are required to run their own business without benefit of preferential treatment and discrimination than others.

5.8 Transparency

In the performance of their professional stakeholders including employees, contractors, agents, customers, partners, suppliers and consultants they are required to run their own business in a clear and accurate, timely and comprehensive in relation to the legitimate interests of the various stakeholders.

5.9 Special rules

5.9.1 Type of employment

All employees are hired under a regular employment contract. The conditions of the relationship are those provided by the National Contract category.

5.9.2 Flexibility

In the management of staff and to ensure maximum efficiency all employees, the Company takes into account the benefit of needs in relation to maternity and child care, all legitimate forms of organization of full or part time.

5.9.3 Equal opportunities and confidentiality of the relationship

OCAM LTD provides its employees a treatment commensurate with the quality and quantity of the service performed. The management report is required by both sides, in accordance with local regulations, the maximum privacy in the management of the information received.

5.9.4 Protection of information

The information and documents within OCAM LTD, including the personal information of members and employees as well as customers and suppliers, the strategies and the know-how of the company, should be kept with the utmost care and properly protected.

5.9.5 Conflicts of Interest

Each employee is bound by the obligation of fairness and non-competition under the terms established by art. 2105 of the Civil Code. Each employee shall not create a conflict between their interests and those of the company being incorporated in each case a detriment to the company or to employees or third parties in general, especially if the interest prejudice in any way the safety of workers, whether they are employees of the same employee.

Respect for the dignity and the dignity of the human person view to safeguarding the safety of all workers.

Each employee, employees, agents, partners, and consultant both in relationships with subordinates and superiors in general to all colleagues was held to discuss maintaining a behavior and an attitude in keeping with the decorum and dignity of the human person and of the places where is explicit activity. For example, blasphemy, foul language and offense will be subject to recall by the managers. Such attitudes, if repeated over time, will be sanctioned. In addition, a similar procedure will be triggered by the company when in the conduct of the employee will make it dangerous for security purposes, for their own and other people's person. The Supervisory Board and the personnel in charge of the supervision and implementation of procedures implemented to protect the worker and the activity of all workers must constantly monitor the behavior of each individual, so that no one submits, even if in good faith, to risk of injury to their person or others.

5.9.6 Principles of conduct in relations with customers

Each employee, employees, agents, partners, and consultant must lavish order to respect a good customer satisfaction. The report will be more profitable in proportion to the achievement and compliance with the safety requirements of each individual site. The activity of OCAM LTD must meet more than the minimum standards required by law, even the training and information of customers, which

due to inexperience are not aware of the various problems arising from the business.

5.9.7 Principles of conduct in relations with agents, consultants and suppliers

The standards of conduct set out express general principles to be carried out also in operations with brokers, banks or brokers.

The relationship with any employee, agent, consultant partners and is intended to be part of us, a key and strategic role defined in the farm system. Each employee shall be an active and supportive to the achievement of customer satisfaction to ensure mission in strict compliance with the procedures of organization and control of security to protect the activity of each employee.

5.9.8 Principles of conduct in relations with the market

The standards of conduct set out the general principles expressed in the respect of competition and operations based on when provided by trade associations Confindustria.

OCAM LTD is committed to promote and disseminate information that is useful to the customer with the utmost respect of competition. Also undertakes to maintain an attitude and financial behavior that ensures reliability and robustness in relation to their customers. Compliance with all regulations regarding safety and protection of employees in the workplace, is a clear message to corporate transparency and reliability to all customers.

5.9.9 Accounting and internal control.

OCAM LTD operates with the utmost transparency by preparing financial statements that guarantee reliability and reliability to customers. The dividend is reinvested in the development of the business and to promote strict compliance with the regulations in terms of safety and protection of workers, even when the market did not want to recognize the costs. It also promotes all the processes required to ensure analyze and effectively manage the business risks associated with the business. Employees and auditors of financial statements are required to keep true and accurate records of all business transactions. Compliance with all regulations regarding the safety and protection of workers through a financial planning and investment in the workplace, is a clear message to corporate transparency and reliability to all customers.

This procedure is given to all workers and employees under current OCAM LTD. Similarly, it will be delivered to employees and prospective employees.

6 Distribution

This procedure is given to all workers and employees working in **OCAM LTD**. Similarly, it will be delivered to employees and employees hired in the future.