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	<b>CODE OF ETHICS</b>	Rev. 00	January 2009

SMC Lavoro e Ambiente srl offers services and advice to businesses, institutions and individuals in the field of occupational health and safety. The goal of SMC Lavoro e Ambiente srl is to operate with high moral criteria, such as the full observance of the law, respect for the employees working within it and a fair competition to other structures in the same sector. In compliance with its labor and environmental goals SMC is based on the values of democracy, equality, equity and solidarity and it is bound to comply with this Code of conduct for all its internal or external acts. In this context, this Code, constitutes a reference to all stakeholders contributing to the SMC and Lavoro e Ambiente srl, and mainly to the ones called to handle and manage it.

## Principles

### Trust:

SMC Lavoro e Ambiente srl cannot succeed without the trust of all those who every day give their support and cooperation, even with partially conflicting interests. The trust is based on a shared mission, the compliance by any of the values and provisions of this Code: each person is committed, therefore to its strict observance. The failure to meet the standards of this Code is not compatible with the work done for the same goal at any level. Natural corollary to the above is the mutual respect within the assigned roles, leading to a cooperation between players, characterized by an overall urbanity of manners and language consistent with the attitude of politeness that, should reign inside and outside the company.

### Human Resources:

The development of human resources, the respect for their autonomy, the incentive based on their participation in decisions, are key principles for SMC manager's awareness that will arrange training programs and prepare to harness the specific professional skills while maintaining and enhancing the capabilities acquired during the cooperation.


### Honesty:

SMC Lavoro e Ambiente srl must ensure that its representatives and employees have an awareness of the ethical significance of their actions, do not pursue profit at the expense of personal or corporate compliance with rules and standards set forth. In particular, it must prevent that illicit benefits are attributed to customers or suppliers. SMC Lavoro e Ambiente srl must ensure that its representatives and employees do not operate in situations in which they are holders, direct or indirect of interests conflicting with those of their counterparts in the contract.

### Transparency:

The SMC Lavoro e Ambiente srl must ensure that its representatives and employees communicate with clarity, honesty and diligent image in all its dealings and will facilitate understanding. To that end they ensure that information at most complete and transparent as possible in regards to the guidelines of the activity of the company.

### Confidentiality:

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SMC Lavoro e Ambiente srl must ensure that its representatives and employees protect the confidentiality of personal data contained in databases and personal files, and must ensure that all the formalities required by current regulations regarding privacy are observed. The elaborations of the data collected with specific forms will be carried on exclusively for activities of SMC.

**Impartiality:**

SMC Lavoro e Ambiente srl must ensure that its representatives and employees operate taking into account the actual circumstances, not taking discriminatory and opportunistic conducts. SMC Lavoro e Ambiente srl undertakes not to discriminate on race, religion, sex, political opinion, and physical condition.

**Health and Safety in the Workplace:**

SMC Lavoro e Ambiente srl strives so that the following may be guaranteed:

- the physical and mental integrity of its employees
- working conditions respectful of individual dignity
- safe and healthy workplaces

in full compliance with the laws and regulations, in force to insure prevention of work accidents and protection at the work site.

**Fair Competition:**

SMC Lavoro e Ambiente srl's relationship with competitors is based on the principles of fair competition.