

ETHICAL TRADING POLICY

Introduction

NEW BOX S.p.A. operates in a variety of institutional, economic, political, social and cultural rights in constant and rapid evolution. All activities in New Box S.p.A. must be performed in full respect of the law, in a context of fair competition, with honesty, integrity, fairness and good faith, respecting the legitimate interests of customers, employees, shareholders, business partners, lenders and the community in where the company is present with its activities.

All those that work in New Box SpA, without distinction or exception, are committed to comply with and ensure compliance with these standards as part of their duties and responsibilities. In no way whatsoever to act on behalf of the company can justify the adoption of behaviors that conflict with these principles.

In pursuing this policy, we seek to develop relationships with suppliers who share our values and operate in an ethical manner. Part of an ongoing effort to develop and strengthen relationships with our stakeholders, we have adopted and use the following guiding principles:

1. Establish a strong and direct relationship with employees, through open and honest communications.
2. Treat employees with fairness, dignity and respect.
3. Comply with all relevant labor laws, including those relating to working hours, pay and representatives of third parties.
4. Valuing Diversity, in the broadest sense of the term.
5. Consider each other are able to perform to the highest level.
6. Pay employees in a manner commensurate with performance.
7. Provide employees with opportunities for personal and professional development.
8. Ensure, together with our employees, the safety of the workplace.

We expect that our partners comply with all applicable laws and similar standards and principles in the countries in which they operate.

Work Environment

The number of employees and temporary employees should be judged on their ability to perform the work, and not to the physical characteristics or beliefs, affirming the principle of the absence of discrimination based on race, color, sex, religion, political opinions, nationality or sexual orientation.

Health and Safety

You have to set up secure jobs, applying policies and practices to minimize the risk of accidents and injuries and exposure to health risks.

You have to provide a work environment free from dangers and hygienic, keeping in mind the most important notions of the industry and of any specific risk.

Appropriate measures must be taken to prevent accidents and injury to health arising from, are associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

Employees receive training regular and recorded health and safety in the workplace and such training shall be repeated for new employees and when employees change department.

There is access to clean toilet facilities and potable water (you can drink), and if applicable, will be provided sanitary equipment where to store food.

In the event that the accommodation is also provided, it will be appropriate to the basic needs of the employees and security.

The company observing the code shall assign responsibility for health and safety to a senior management representative of higher.

Child or forced labor, violence and misconduct

Do not hire children under the age established by law, and will not tolerate physical violence or other forms of unlawful harassment, it is used in forced labor or otherwise obligated in any of the activities.

You do not require employees to "deposit" money or leave their identity papers with their employer.

Employees are free to leave their employer after reasonable notice.

These policies and procedures shall conform to the provisions of the relevant ILO standards ('International Labour Organization').

Physical abuse or physical disciplinary measures, the threat of physical abuse, torment of a sexual nature or otherwise, verbal abuse, and other forms of intimidation are prohibited.

Compensation and benefits

Employees must be paid in a fair and competitive compared to the market, in full compliance with the relevant local and national laws on wages and hours of work and must be given the opportunity to develop their skills and capabilities.

Working hours comply with National laws and standards of industry's benchmark.

Overtime shall be voluntary and shall always be compensated with a payment higher than the norm.

Third Parties

In the event that employees have lawfully chosen to be represented by third parties, these must be recognized in good faith and should not retaliate against employees for their legal participation in union activities.

In the event that the freedom of association and the right to collective bargaining should be limited by law, the employer facilitates, and does not hinder, the development of parallel means for independent association and free collective bargaining.

Environmental Practices

New Box S.p.A. is aware of the importance of the environment and on the optimization of the use of energy resources for the achievement of sustainable development, the environment can be also a competitive advantage in an increasing market of quality and conduct.

The Company's strategy is geared to the interests of investments and activities that meet the principles of sustainable development.

Therefore also all the partners of New Box must operate in order to protect and preserve the environment.

Relations with suppliers

New Box S.p.A. intended to indicate the principles under which the company selects its suppliers and intends to maintain relationships with them.

The selection of suppliers or counterparties in general and the formulation of contractual terms is inspired by values of fairness, impartiality, fairness in price, quality of goods and / or services, by comparing the different offers on the market and carefully assessing the guarantees given regarding the precise fulfillment of what was promised.

Procurement processes should be aimed at the pursuit of the ultimate competitive advantage for the Company and the fairness and impartiality towards all suppliers who meet the requirements, excluding any form of discrimination.

The signing of a contract with a third party must always be based on extremely clear agreements, avoiding, where possible, the recruitment of contractual obligations that involve forms of dependence on the supplier contractor.

Prior to establishing business relationships with third parties, targets must adequately verify the information available, including those of a legal and financial counterparties and of suppliers in order to verify their respectability and legitimacy in relation to the type of action proposed.

It is in any case forbidden to accept gifts or favors that could affect the choice of the supplier and / or contract conditions.

New Box is also aware of the working conditions in the mines of the Democratic Republic of Congo and other countries such as Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, Sudan, Tanzania, Uganda, Zambia and the fact that through the proceeds from these mines are financed serious internal conflicts in these countries.

Therefore, in order to:

- Implement purchasing policies ethically sustainable
- To promote fair competition, prevent corruption, strengthen the protection of the environment, ensure health and safety, protect human rights, prevent discrimination
- And in accordance with the directives of the "United Nations Global Compact" and the "Declaration of Human Rights"

New Box has decided not to purchase any products or raw materials that directly or indirectly result coming from these regions.