

Code of Ethics

Biffi Italia S.r.l.

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INTRODUCTION

This Ethics Code defines the collection of ethical and behavioural values, principles and rules, to which Biffi Italia S.r.l. (hereinafter known as "**Biffi**") aspires to in the pursuit of their objectives and interests, and the observance of which, they consider essential for the correct pursuance of company activities and to protect the reliability, reputation and image of Biffi Italia and the Group to which they belong within the market.

With the adoption of this Ethics Code Biffi establishes the rules of conduct and the behaviour that is relevant for the purposes of Legislative Decree no. 231 of 2001 (hereinafter "**Decree 231**") to be adhered to by all spokespersons for Biffi (for instance, the shareholders, employees, collaborators, members of the company Bodies, suppliers, outside contractors, consultants, agents, purchasers, distributors, business partners, the Public Administrations, Italian and foreign, private clients, and in general, all those persons who have a collaborative or business relationship with Biffi). As such Biffi requires all those who work with Biffi to strictly adhere to the rules contained in the Ethics Code, which is circulated by Biffi for this purpose. For the same purpose, this Ethics Code is distributed to all third parties with whom Biffi enters into business relations with.

This Ethics Code is integrated by the "*Ethics Behavioural Guide*" (in the version drafted by Tyco International Ltd.) which was already adopted by the Tyco Group some time ago and by Biffi on 30 May 2003, in order to encourage and ensure, amongst other things, the observance of the highest standards of individual and company integrity, and responsibility in the undertaking of their activities. This "*Ethics Behavioural Guide*" is an integral and substantial part of this Ethics Code.

This Ethics Code is furthermore an integral and substantial part of the Organisation, Management and Control Model adopted by Biffi as per Decree 231 (hereinafter "**Model**") in order to prevent the commission of the offences contained therein.

Failed adherence to the Ethics Code may be a source of damage for Biffi and constitutes a violation of the Model: it therefore includes behaviour that may be sanctioned according to that scheduled by the Disciplinary System adopted by Biffi in relation to Decree 231.

1. ADHERENCE TO THE LAWS AND REGULATIONS

Biffi believes in the value of work and considers the legality, the correctness and transparency of action arranged for the achievement of their own economic, productive and company objectives.

Biffi has as an essential principle, adherence to the laws and regulations that are in force in all the countries in which they carry out their activities; consequently, all the employees, the members of the Company Bodies, the agents, the purchasers, the distributors, the collaborators, as well as those that operate for and on behalf of Biffi are obliged to strictly and with diligence observe the laws and regulations that are in force in all of the countries in which Biffi operates, as well as the rules contained in this Ethics Code and, to a limited extent, the applicable aspects for the company regulations and procedures.

Even the consultants, suppliers, clients of Biffi and anyone who has relations with the latter, are obliged to adhere to the laws and regulations in force and the principles of loyalty, professional correctness and transparency, in the protection of company interests.

In no case may the purposes or interests of Biffi be pursued and/or achieved in violation of the current laws and regulations, or via behaviour that is not in line with this Ethics Code.

All those who operate within Biffi should be aware of the following laws and behaviour: the lack of awareness of the laws does not exonerate from any liability; if in doubt as to the behaviour to adopt or how to proceed, the necessary clarifications may be requested from the Supervisory Body, which will arrange to adequately inform on the laws and behaviour to be adopted.

Biffi will not initiate or continue any relations with those who do not intend to align themselves to the aforementioned principles.

2. RELATIONS WITH COLLABORATORS

In reference to the fundamental principle of adherence to the current laws and legislation, Biffi will actively ensure that all their collaborators act:

- with professional correctness with regard to current legislation in all the countries in which Biffi operates, with principles of transparency, verifiability, coherence and congruity;

- in observance of the organisational and management rules and procedures adopted by Biffi, in particular those that are expressly scheduled for the prevention of the commission of offences.

In no case, may any fees be paid to those, who in any capacity, operate for and on behalf of Biffi in any way that is not in accordance with the services rendered to Biffi.

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All the collaborators are obliged to respect private/privileged information and any "*price sensitive*" information, they may come across because of the position they hold or the activity they carry out for Biffi, not disclosing to anyone on the outside and not sharing this information with other persons - not even their own colleagues - if not in compliance with the current rules of law, principles of correctness, completion, suitability, timeliness and not selective of the disclosure of information and the applicable company procedures.

Furthermore, all the collaborators are obliged to respect sensitive information of a private nature belonging to Biffi, to not disclose to anyone on the outside and to not share this information with other people - not even their own colleagues - who do not need to know about it. For instance, confidential memos may not be disclosed where they concern contracts agreed with business partners, company information of a financial nature, news in relation to particular company operations (such as for example, acquisitions and/or resignations), lists of clients and contracts, data regarding market shares, contracts agreed with suppliers and anything else considered private in order to protect company business. Equally, collaborators will abstain from behaviour and declarations that might in any way damage the image of Biffi, and in general of the Tyco Group; to the contrary, they will promote this image also by means of the correctness of behaviour to which they are committed.

It is however expressly prohibited to use information that is not in the public domain, which they become aware of because of the position they hold or due to the fact that they have a relationship with Biffi, in order to negotiate for, directly or indirectly, company shares or bonds or, anyway, to obtain a personal advantage or the favour of others.

Furthermore, any information that is in the possession of Biffi and the data acquired and managed by the personnel and collaborators as part of their activity, also via appropriate databases, should be handled within the limits established by company procedures and always in adherence to current legislation on the subject of privacy and protection of personal data, also in order to prevent Biffi from being accused of appropriation and unlawful use of this information.

3. RELATIONS WITH PUBLIC INSTITUTIONS

Business affairs and relations with the Public Administration, public employees, managers and officials who act on behalf of the Public Administration and the Public Bodies or the like, including here the Supervisory Authorities and in any case, with institutional spokespersons, whether Italian or foreign, (hereinafter collectively the “**Public Institutions**”) of Biffi are conducted in compliance with the law and in adherence to the principles of loyalty, correctness, transparency and verifiability. In the event of doubt with regard to the qualification of an entity as a Public Institution or the subjects who are considered to belong to Public Institutions, the necessary clarifications may be requested from the Supervisory Body.

Biffi condemns any manifestation of corruption, bribery or conflict of interest and adopts all the most suitable measures for preventing and avoiding these events. In particular, with representatives, managers, officers or employees of Public Institutions, Italian and foreign, the following are expressly prohibited:

- the search for and foundation of personal relationships of favour, improper influence and undue interference that could condition, whether directly or indirectly, the decisions of counterparts, including those who act on behalf of the Public Institutions and/or the development of a correct relationship;
- all behaviour that is directly aimed at generating any opportunity of employment or other form of collaboration and/or commercial possibility and any other activity that might be of personal advantage to the representative of Public Institutions, both in Italy and abroad;
- the offers or the promises of money or assets or other services (in any form or way) to representatives, managers, officers or employees of the Public Institutions, or their relatives, whether Italian or from other countries, even indirectly and/or via a third person, except if this concerns donations or assets or other services of moderate value and are of an appropriate nature, in compliance with the current uses in the particular legislative and company context and with applicable legislation, and as long as these donations, assets or other services may not be understood as or interpreted as attempting to gain favours;
- the acceptance for oneself or for others of offers or promises of money or of assets or other services to promote or favour the interests of third parties in their relations with Biffi;
- the offers or the acceptance of any object, offices, services or favour of value to obtain or concede more favourable treatment in relation to any relationship held with the Public Institutions;

- actions aimed at requesting or obtaining private information from Public Institutions beyond that permitted by the law.

The employee and anyone who operates for and on behalf of Biffi who receives requests or offers, explicit or implicit, is obliged to promptly inform their managers or the Biffi legal representatives and inform the Supervisory Body, as well as suspend any relations with the third parties involved, until they receive specific instructions.

In all cases the acquisition of orders and the awarding of contracts and, in general, the calling of tenders with the Public Institutions should occur in compliance with the rules of law and internal company procedures and, however, always in adherence with correct business practices, including the economic principles and above-board competition with competitors. It is prohibited to advance pretexts towards the purchasing public, if not considered legitimate and in compliance with the contracts agreed or relations under way.

In conducting any Biffi business, any situations should be avoided in which the subjects involved in the operations and transactions are or may appear to be, in a conflict of interest situation. The employee and anyone who operates for and on behalf of Biffi is obliged to promptly inform their managers or their spokespersons in the event in which there should be seen to be any situation of conflict of interest (even potential), which might, in any way, even apparently, influence in relations with the Public Institutions.

In the event in which in their relations with the Public Institutions, Biffi should be represented by a third party, this consultant and their personnel should adhere to the principles and prohibitions contained in this Ethics Code and the same prescriptions that are valid for the employees of Biffi will be applied against them or for the recipient parties of this Ethics Code and the Model.

In no case, should Biffi be represented in relations with the Public Institutions by a consultant or a third party, when situations of conflict of interest may be created.

Furthermore, adherence to current legislation should be guaranteed in the case in which Biffi should need to avail themselves of the professional services of employees of the Public Institutions as consultants.

The sponsoring of events, presentations, meetings and similar initiatives promoted by the Public Institutions may be undertaken only if in compliance with the law and the principles of loyalty, correctness, transparency and verifiability and with regard to the ethical principles and procedures adopted by Biffi and anyway, as long as they cannot be understood or interpreted in any way, such as to be looking to gain favour and/or as long as they do not include one of the prohibited behaviours as per

this Ethics Code. These same principles are applied to possible acquisitions and adhesion to initiatives carried out for beneficial aims, in whatever form.

All the aforementioned rules of behaviour regarding relations with members of Public Institutions should also be observed in reference to the members of the Bodies of the European Community and officials of the European Community and states outside of this, in general, foreign institutional spokespersons.

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Contributions, awards or finance obtained from the State, from another Public Entity or from the European Community should be used exclusively for the aims and according to the methods for which they have been granted.

It is prohibited to use the abovementioned payments for different purposes or according to different methods; it is furthermore prohibited to use or present false declarations or documents or to attest to facts that are not true, as well as to omit information that should be there or to resort to artifices or deceit in order to achieve contributions, grants, finance, tax breaks, payments or to acquire any unlawful profit to the detriment of the State or the Public Entities.

All representative acts, declarations issued and documents presented in response to a request for the achievement of the abovementioned donations should be correct, truthful, accurate and complete.

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In the event of access to computer or data processing systems belonging to the Public Administrations (for instance, computerised registers), all employees and collaborators and those who work for and on behalf of Biffi are prohibited from altering, in any way, the function of the computer or data processing systems, or to interfere without right in any way with data, information or programs contained within the computer or data processing system.

* * *

Financing to parties, individual candidates, associations, committees, organisations and public institutions will take place in accordance with the law and in full transparency and in the observance of the internal company procedures that are applicable. For the possible financing, as much information as possible should be provided to the Supervisory Body.

4. RELATIONS WITH PRIVATE SPOKESPERSONS

Relations with third parties (clients, suppliers, external collaborators, partners, consultants, etc.) these should be undertaken whilst strictly observing company procedures and should be prepared with loyalty, correctness, transparency and efficiency, with regard to the spirit of collaboration; the observance of these principles should furthermore be requested of third parties, who should be made aware of this Ethics Code.

The principles and behavioural laws that are applicable to relations with the Public Institutions are also valid for relations with private spokespersons.

Equally, these private spokespersons should adhere to these principles and laws whilst carrying out their activity for and on behalf of Biffi or, anyway, in favour of Biffi.

5. BIFFI ITALIA ACTIVITY AND VERIFIABILITY OF ACTIONS, OPERATIONS AND TRANSACTIONS

Each action, operation and transaction should be correctly and appropriately registered, authorised, legitimate, correct, coherent, transparent and verifiable. In particular, for each action, operation and transaction it should be possible to verify the decision-making, authorisation and implementation processes.

For each operation and transaction, it is obligatory to rigorously observe all the company procedures in relation to the given operation and transaction, as well as to provide appropriate documentary support that will allow controls to be carried out to confirm the nature and the reasons for the operation and to single out who has authorised, carried out, registered and verified the operation and the transaction.

6. BUDGET – ACCOUNTS - COMPANY COMMUNICATIONS AND RULES OF BEHAVIOUR

Adherence to the rules of law and full observance of the principles of transparency, veracity and correctness of the accounts and any other document in which economic, share capital and financial items are set out, are essential values and criteria for Biffi. Therefore, Biffi will ensure suitable basic training for the persons involved, in order to ensure that they are informed of the fundamental principles and rules to be adhered to.

All employees and collaborators with Biffi who are in any way involved in operations to draft the budget or other similar documents should ensure maximum collaboration, completion and clarity of the

information supplied, as well as the accuracy of the data and the documents.

Transparency is founded on truthfulness, accuracy, completeness and timeliness of all the documents and information of an accountancy nature, both internal and external: all operations should be duly authorised and fully and accurately registered on the basis of the rules of law and the principles of accountancy that are generally included and in force, as well as on the basis of company procedures prepared to protect accountancy activities, the strict observance of which is requested and imposed on all the persons involved.

Each operation should be based on adequate support documentation and verification of the activity carried out, which should always be able to be traced and consulted. In every case the work done must be correctly and duly represented in the accounts, keeping the related documentation.

If it should be found or it should come to light that there have been falsifications, omissions or negligence in the accounts or in the related documentation, the directors, the statutory auditors, the auditors, the managers arranging the drafting of the company accounts documents, those that hold senior positions, the employees, collaborators and consultants are obliged to inform their respective spokespersons (the Board of Directors, the Statutory Board of Auditors, the auditing company, their managers, etc.) and inform the Supervisory Body.

The violation of company procedures on the matter of the budget and the accounts will entail the application of disciplinary sanctions and measures indicated within the Disciplinary System adopted by Biffi in compliance with Decree 231, in order to prevent the commission of the offences scheduled in it.

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Considering the above, the behaviour and conduct that is prohibited as per this Ethics Code is indicated as follows:

- a ban on false company communications: within the budgets, reports and other company communications scheduled by law, it is expressly prohibited to add material facts that are not truthful (even if it is the subject of assessment) or to omit information (the communication of which is imposed by law) about the economic, share capital or financial situation of Biffi or the Group to which it belongs;
- a ban on falsifications in reports or communications from the audit company: in reports or other communications from the audit company, it is prohibited to confirm falsehoods or to hide

information in relation to the economic, share capital or financial situation of Biffi.

- a ban on obstructing controls: it is prohibited, by means of any behaviour, to prevent and impede the undertaking of control or audit activities that are legally attributed to the share holders, the other company bodies or the audit companies;
- a ban on unlawful return of capital: outside of those cases of legitimate reduction of capital, it is forbidden to return capital, also by means of concealed channels, to the shareholders or to free them from the obligation of awarding;
- a ban on the illegal allocation of profit and reserves: it is forbidden to allocate profits that have not been effectively achieved or are legally destined for reserves or spread reserves (even though not established with profits) not able to be distributed by law; it is furthermore prohibited to allocate interim profits;
- a ban on carrying out illegal operations on shares or securities of the holding company: aside from cases permitted by law it is prohibited to acquire or underwrite company shares or securities, including those of the holding company, if this should cause harm to the integrity of the share capital and the reserves that cannot be distributed by law;
- a ban on completing operations in prejudice of creditors: it is forbidden to carry out operations to reduce the share capital or mergers or divisions, in violation of the rules of law in protection of creditors and causing harm to the creditors themselves;
- a ban on the fictitious formation of capital: it is prohibited to fictitiously form or increase capital by means of the attribution of company shares or securities in greater measure than the amount of share capital, reciprocal subscription of shares or securities, significant over-valuation of the capital value of goods in kind or financial assets or of the share capital in the case of transformation;
- a ban on illegal influence over the assembly: it is expressly prohibited for anyone to determine the majority in Assembly with fake or fraudulent acts and behaviour, in order to procure an unlawful profit personally or for others;
- a ban on market manipulation: it is prohibited to circulate false news or to practice any other deceit that is aimed at causing a notable alteration in the price of unquoted financial instruments, for which a request for admission for business has not been presented in a regulated market, or

rather if this should impact significantly on the credit-worthiness of the capital stability of banks or banking groups. The use of knowledge which has come about during work relations or relations with Biffi in order to gain an advantage of private information in relation to other subjects, could constitute a violation of the law. It is prohibited to use private information in share operations by employees and collaborators of Biffi, as well as the circulation of information in relation to securities and financial instruments quoted on the stock exchange;

- a ban on the obstruction of the exercise of functions of the Supervisory Public Authorities: for all those who have relations with the Public Supervisory Authorities, it is prohibited in any way, also by omitting communications that they should have, to obstruct their functions. Furthermore, it is prohibited to expose any Public Supervisory Authority in communications scheduled on a legislation basis, in order to hinder the exercising of supervisory activities, material facts that are not in compliance with the economic, share capital or financial situation of Biffi, it is also prohibited, for the same reason, to hide even partially, with fraudulent means, any facts that should be communicated. These bans are also applied in the event in which the information is related to possible assets owned or administered by Biffi on behalf of third parties.

7. FALSIFICATIONS OF BANK NOTES, COINS, LEGAL TENDER AND REVENUE STAMPS

It is forbidden to falsify, hold, spend or however put into circulation any banknotes, coins, legal tender, or revenue stamps that have been counterfeited or altered. In the event in which falsifications or alterations should come to light or falsifications or alterations are suspected, the employee and the collaborators should inform their spokespersons (direct manager or person in charge) and inform the Supervisory Body, subject to the obligations of the law.

8. PROTECTION OF HEALTH AND SAFETY IN THE WORK PLACE

Biffi commits to adhere to current legislation on the subject of health and safety in the work place. Biffi in managing health and safety, aspires to the following principles and criteria, to which the whole company, whether at a managerial level or at an operational level, should adhere to, in particular when decisions need to be taken or choices have to be made, or when these need to be implemented:

- a) avoid risks;

- b) assess the risks that cannot be avoided;
- c) combat risks at the source;
- d) adjust the work to the person, in particular as concerns the design of workstations and the choice of work equipment and methods of work and production, in particular to be able to minimize monotonous work and repetitive work and to reduce the effects of this sort of work on the worker's health;
- e) consider the level of evolution of techniques;
- f) substitute the dangerous with the non-dangerous or less dangerous;
- g) plan prevention, by looking at a coherent complex that includes within it the technique, organisation of work, the conditions of work, company relations and influence of the work environment factors;
- h) give priority to the collective measures of protection with regard to individual measures of protection;
- i) give out suitable instructions to the workers.

9. PROTECTION OF THE INDIVIDUAL, OF THE DEMOCRATIC ORDER, THE ENVIRONMENT AND OTHER PRINCIPLES AND RULES OF BEHAVIOUR

Biffi condemns any activity that might imply the exploitation or reduction into a state of subjection of any individual and furthermore recognises the primary importance of the protection of minors and the repression of any form of exploitation of child labour.

Biffi commits to not use any form of exploitation or reduction into a state of subjection of any individual and/or minor. Each employee, collaborator and anyone who operates for and on behalf of Biffi who should become aware of, within the sphere of their work or activity, of any acts or behaviour of exploitation or reduction to a state of subjection of any individual and/or a minor, is obliged to promptly inform their superiors or spokesperson and the Supervisory Body, subject to the obligations of law.

Biffi commits to also make their suppliers aware of this.

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All Biffi collaborators are obliged to use the computer instruments at their disposal, exclusively as a work instrument, with regard to current legislation and applicable company procedures. Biffi condemns the use of the information networks for the use and exchange of pornographic material (especially produced by means of the sexual exploitation of minors) by Biffi personnel.

Each collaborator with Biffi is responsible for the safety of the computer programs used, adherence to the legislative procedures in place and the conditions of the license agreements, and is obliged to give the necessary commitment in order to prevent the possible commission of offences by means of the use of computer instruments.

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Biffi condemns any form of activity that is aimed at terrorism or subversion of the democratic order and the principles of free political choice. It is expressly prohibited to exhibit any behaviour that might constitute or be connected to terrorist activities or subversion of the democratic order of the State. Any employee, collaborator or anyone who operates for and on behalf of

Biffi who becomes aware of, in the sphere of their tasks or activity, acts or behaviour that has terrorism purposes (including therein, help and financing of these activities) or subversion of the democratic order, is obliged to promptly inform their superiors or spokespersons and the Supervisory Body, subject to the obligations of law.

* * *

Biffi condemns any form of receipt, laundering and use of money, assets or services of an illegal origin: the following operations or activities are strictly prohibited:

- to acquire, receive or hide money or property originating from any offence, or anyway to be involved in acquiring, receiving or hiding them;
- substitute or transfer money, assets or other services originating from a non culpable offence or rather carried out in relation to these other operations, in order to hinder the identification of their illegal origin;
- use in economic or financial activities of money, assets or other services that originate from an offence.

Every employee, collaborator and anyone who operates for and on behalf of Biffi who within the sphere

of their work or activities becomes aware of acts or behaviour by other employees, collaborators and subjects who operate for and on behalf of Biffi who have the aforementioned aims, is obliged to duly inform their managers or the legal representatives for Biffi and the Supervisory Body, subject to the obligations of law.

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Biffi acknowledges the primary importance of the environment and carries out their activities with respect towards the environment and observing the current laws and regulations. Biffi monitors the environmental impact of their activities and encourages respect for the environment. Equally, Biffi places primary importance on the health and safety of the workers, implementing and respecting the legislation of reference.

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Biffi condemns any form of criminal association and/or Mafia association or anyway aimed at tobacco contraband or the illegal traffic of narcotic or psychotropic substances, as well as clandestine immigration both within a national and international sphere. It is prohibited to engage in any behaviour that might constitute or be connected to the abovementioned activities. Every employee, collaborator and anyone who operates for and on behalf of Biffi who within the sphere of their work or activities becomes aware of acts or behaviour by other employees, collaborators and subjects who operate for and on behalf of Biffi who have the aforementioned aims (including help and financing of this activity), is obliged to duly inform their managers or the legal representatives for Biffi and the Supervisory Body, subject to the obligations of law.

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Biffi condemns any form of induction to not render declarations or to render threatening declarations to the legal authorities, as well as any form of personal favouritism, whether in a national or an international sphere. It is prohibited to engage in any behaviour that might constitute or be connected to the abovementioned activities. Each employee, collaborator and anyone who operates for and on behalf of Biffi who should become aware, within the sphere of their work or activity, of any acts or behaviour that is contrary to the principles and laws that are applicable and protected by Biffi, are obliged to promptly inform their superiors or spokesperson and the Supervisory Body, subject to the obligations of law.

10. COMMUNICATION, TRAINING AND IMPLEMENTATION - DISCIPLINARY SYSTEM

In order to implement the principles to which to aspire within this Ethics Code and to guarantee their observance, Biffi shall:

- adopt specific methods to control the compliance of the behaviour of the managers and employees to the provisions of current legislation, to internal regulations, to this Code and the Organisation and Management Model;
- verify that all the operations should be carried out with regard to the legislation in force in all the countries in which Biffi operates, even availing themselves of documentation in relation to the process of decision, authorisation and development to be arranged for each operation (see above, subsection 5);
- make all the collaborators aware of the legislative regulation, the behavioural rules and the procedures to adhere to, in order to ensure that the activity is carried out with adherence to the ethical principles considered in this Code and the procedures highlighted in the Model;
- circulate to anyone who has relations with Biffi the principles contained within the Ethics Code and the Model, requiring adherence to these in so far as it should concern them. For this purpose, in the contractual document the commitment to the principles of the Ethics Code and the Model adopted by Biffi will be expressly scheduled, and for those who do not intend to either align themselves to these, Biffi will not initiate or not pursue the contractual relations;
- ensure a suitable activity of continuous training and awareness on the aspects that are inherent to the Ethics Code and the Model, differentiated according to the role and responsibility of the subjects involved;
- adopt a suitable Disciplinary System for the failed observance of this Ethics Code and the Model.

The task of supervising this Ethics Code falls to the Supervisory Body established as per Decree 231.