

**TO ALL MANAGERS, EMPLOYEES AND EXTERNAL CONTRACTORS OF OCME S.r.l.**

On November 28th 2014 the Board of Directors of the Company resolved to adopt the new Organizational Model according to Legislative Decree no. 231/01.

The application of the Organizational model entails the formal and final adoption of the ethical principles which have been longlasting features of the company's life.

The Organizational model includes the documented traceability and control on management procedures in order to prevent the risk of committing certain offences within the Company.

The Organizational model is an important instrument; the specific indications are to be followed in order to avoid risks which may result in serious consequences for the Company.

The Model will be published in full and viewable on web portal Ocme Management of Procedures. A paper copy will be available at the Human Resources Dept.

The Organizational Model provides that a specific control body - Supervisory Body - shall carry out periodic controls on a sample basis to monitor the application of the envisaged procedures and protocols.

For this reason, in the same resolution of November 28th 2014, the Supervisory body was appointed, for a three-year term, in the persons of Mr. Giovanni Catellani (President), Mr. Pier Luigi Pernis and Mr. Pier Giuseppe Ferrari.

The failure to meet the afore-mentioned provisions could lead to the application of disciplinary measures as provided for in the Organizational Model.

All the Recipients of the Model are obliged to report to the Supervisory Body any anomalies or deviations from the ethical principles and protocols of the Organizational Model.

For this purpose, we ask you to send any report to the e-mail address [odv@ocme.com](mailto:odv@ocme.com) or contact the internal supervisor Mr. Jacopo D'Oro.

In the same way, or requesting for a conversation (even by phone), you may request for clarification or amplification on the Organizational Model.

The Supervisory Body will also be responsible for constantly adapting the Model in order to ensure that it is truly effective.

Training sessions will be held and the Supervisory Body shall implement actions aiming to raise awareness about the importance of the Organizational Model.

We accordingly ask you to take due account of the Organizational Model and its provisions.