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Friulforgia Srl

CODE OF ETHICS AND ANTI-CORRUPTION

This Code of Ethics and Anti-Corruption has been approved by the top management of Friulforgia Srl

Friulforgia S.r.l. unipersonale

Loc. Pannellia, 55
33039 Sedegliano (UD)

Cap. Sociale Euro 1.000.000
REA Milano n.1857682
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Sede Legale: Nerviano (MI)

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1 INTRODUCTION

The Code of Ethics is the fundamental document of moral rights and duties that defines the ethical and social responsibility that every member of the Friulforgia organisation must respect.

It constitutes an effective measure of preventing irresponsible and unlawful behaviour by those who operate within Friulforgia Srl and on behalf of the company.

The Friulforgia Srl Code of Ethics and Anti-Corruption therefore represents a distinctive and identifying element in relation to the market, customers and suppliers, employees and collaborators, the knowledge and sharing of which is required of all those who work in the Company or collaborate with it.

Its recipients are called upon to strictly respect the values and principles it contains and to protect the integrity of its economic, social and human assets and corporate know-how.

Friulforgia Srl, in carrying out its activities, is engaged to fighting corruption and preventing the risks of unlawful practices, at any work level and in any geographic area, both through the spread and promotion of ethical values and principles, and through the effective provision of rules of conduct and the effective implementation of control processes, in line with the requirements set forth by applicable national and international regulations.

Friulforgia Srl has always been sensitive to these arguments and committed to spreading within its organisation principles, values and behaviour aimed at complying with the laws and regulations on anti-corruption. For example, law 190/12 entitled "Provisions for the prevention and repression of corruption and illegality in the public administration" is strictly complied with, by which the penalties envisaged for corruption offences have been made more severe, introducing among other things the offence of bribery between private individuals.

It also undertakes to comply with the regulations contained in Legislative Decree 231/01 in order to prevent any offence of an administrative nature.

This code is issued and approved by the top management in the person of the special prosecuting attorney of Friulforgia Srl, who is responsible for the supervision and compliance with the content of this document.

2 PURPOSE AND CODE RECIPIENTS

This Code of Ethics and Anti-Corruption (hereinafter, the "Code") illustrates the set of ethical and moral principles that underlie the activities of Friulforgia Srl, as well as the lines of conduct adopted by the Company

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both internally (in relations between employees) and externally (in relations with institutions, suppliers, customers, business partners, political and trade union organisations, and the media ("Stakeholders")).

Respect for these principles is of fundamental importance to achieve the corporate mission of Friulforgia Srl and to guarantee its reputation in the socio-economic context in which it operates.

First of all, it should be pointed out that Friulforgia Srl firmly believes that every activity must be carried out ethically, recognising itself in the principle sanctioned by art. 41 of the Italian Constitution, according to which private economic initiative "cannot be carried out in conflict with social utility or in such a way as to damage security, freedom and human dignity".

This Code is binding for the directors and employees of Friulforgia Srl, as well as for all those who operate and collaborate, on a permanent or temporary basis, on behalf of the Company.

Friulforgia Srl undertakes to promote and its Code both within its organisation and externally, including through its website.

Employees must promptly report to the company's management any news and information they learn about the violation of this Code. In this way, the company will be able to immediately take all necessary actions to restore compliance with ethical standards and restore compliance with the law in the event of a breach, taking all sanctions against violators.

3 GENERAL PRINCIPLES

The conduct of the workers, at all company levels, is marked by the principles of legality, fairness, non-discrimination, confidentiality, diligence and loyalty.

Regulatory references and best practices

- from the regulations in force in the so-called 'domestic' markets, in particular Legislative Decree 231/2001, Decree Law 190/12 (anti-corruption) and the Italian penal and civil code;
- from international regulations U.S. Foreign Corrupt Practices Act (1977) and UK Bribery Act (2010);
- by the relevant Council of Europe Conventions (Civil and Criminal Law Conventions on Corruption - 1999);
- the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997) and the UN Convention against Corruption (2003);
- by self-regulatory regulations adopted by trade associations;

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- international best practices.

3.1 Legality

Friulforgia Srl operates in absolute compliance with Italian law and this Code.

Friulforgia Srl undertakes

1. to ensure the maximum diffusion of the Code of Ethics among employees and external collaborators
2. to provide any possible clarification regarding the interpretation and implementation of the rules of the Code of Ethics and in particular its application in company procedures
3. to carry out checks on any report of violation of the provisions of the Code of Ethics and, in the event of ascertained violation, to adopt the appropriate sanctioning measures
4. to adopt all security measures required by technological evolution and to ensure that the physical integrity and moral personality of employees are guaranteed.

3.2 Integrity

Fairness and moral integrity are an unfailing duty for all Recipients of the Code.

Recipients of the Code are bound not to establish any privileged relationship with third parties that is the result of external solicitations aimed at obtaining improper advantages.

In the performance of their activities, the Recipients of the Code are bound not to accept donations, favours or benefits of any kind (except for objects of modest value) and, in general, not to accept any counterpart for the purpose of improperly granting advantages to third parties.

In turn, the Recipients of the Code must not make donations of money or goods to third parties, or in any case offer unlawful benefits or favours of any kind (except for objects of modest value or commercial courtesy gifts authorised by the Company) in connection with the activity they perform for the benefit of Friulforgia Srl.

The intrinsic conviction that they are acting in the interest of the Company does not exempt the Recipients of the Code from the obligation to punctually observe the rules and principles of this Code.

3.3 Impartiality and Indiscrimination

In decisions affecting relations with its Stakeholders (choice of customers, personnel management or work organisation, selection and management of suppliers, relations with shareholders, relations with the communities and institutions that represent them), Friulforgia Srl avoids any discrimination on the basis of age, sex, sexual orientation, state of health, ethnicity, nationality, culture, political opinions and religious beliefs of its stakeholders.

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Friulforgia Srl acts by respecting the fundamental rights of every individual, protecting their moral integrity and ensuring equal opportunities.

3.4 Honesty and Trasparence

Within the scope of their professional activities, Friulforgia Srl employees and collaborators are required to diligently comply with current laws, the Code of Ethics and internal regulations.

Under no circumstances may the pursuit of Friulforgia Srl's interest justify dishonest conduct.

In the relationship with all its Stakeholders and in the reporting of its activities, Friulforgia Srl ensures truthful, clear and complete information.

3.5 Confidentiality and Protection of intellectual property

Friulforgia Srl is committed to ensuring the protection and confidentiality of the personal data of Recipients and Stakeholders, in compliance with all applicable data protection regulations.

Employees are required to maintain the strictest and absolute confidentiality on all information relating to the company and/or its employees of which they become aware by virtue of their work activities. This is in order to avoid the disclosure of confidential information relating to the organisation, production methods and any other information the disclosure of which could cause damage to the company.

In particular, personnel shall:

1. acquire and process only data that are necessary and appropriate for the purposes directly attributable to the function performed;
2. acquire and process data only within specific procedures
3. store the data in such a way as to prevent unauthorised persons from gaining knowledge thereof
4. disclose the data within the framework of pre-established procedures and/or with the explicit authorisation of superiors
5. ensure that there are no constraints on the possible disclosure of information concerning third parties connected to the company by a relationship of any nature and, where appropriate, obtain their consent.

3.6 Diligence

The relationship between Friulforgia Srl and its employees is based on mutual trust: employees are, therefore, required to work to further the interests of the company, in compliance with the values set out in this Code.

The Code Recipients must abstain from any activity that may conflict with the interests of Friulforgia Srl, renouncing the pursuit of personal interests in opposition to the legitimate interests of the Company.

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In cases where the possibility of the existence of a conflict of interest may be portrayed, the Code Recipients are required to contact, without delay, their hierarchical superior so that the Company may assess, and possibly authorise, the activity potentially in conflict.

In cases of violation, Friulforgia Srl shall take all appropriate measures to put an end to the conflict of interest, reserving the right to act for its own protection.

3.7 Loyalty

Friulforgia Srl and the Code Recipients undertake to achieve fair competition, in compliance with national and EU regulations, in the awareness that virtuous competition is a healthy incentive for innovation and development processes.

3.8 Environmental and Health and Safety defence

In the performance of its activities and in the exercise of its economic initiatives, Friulforgia Srl always keeps among its objectives the improvement of the environmental impact and the prevention of risks to the population and the ecosystem, not only in compliance with the regulations in force, but also taking into account the development of scientific research and best practices on the subject.

Friulforgia Srl is committed to offering its staff a healthy, safe working environment that respects the dignity of workers, guaranteeing compliance with hygiene and health regulations.

Friulforgia Srl also guarantees the protection of health and safety in the workplace for its own personnel and for third parties, committing itself to comply with the regulations in force, promoting the culture of safety to the parties concerned and adopting continuous improvement actions based on the best technology available.

4 RELATIONS WITH EMPLOYEES AND COLLABORATORS**4.1 Recruitment**

Personnel evaluation and selection are carried out according to fairness and transparency, respecting equal opportunities in order to match the needs of Friulforgia Srl, with the professional profiles, ambitions and expectations of the candidates.

Friulforgia Srl undertakes to adopt all useful measures to avoid any form of favouritism in the personnel selection process, using objective and meritocratic criteria, respecting the dignity of the candidates and in the interest of the good performance of the company.

The personnel hired, also through the implementation of this Code, receive clear and correct information on their roles, responsibilities, rights and duties.

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4.2 Staff Management

Friulforgia Srl protects and enhances the value of its human resources, committing itself to maintaining the necessary conditions for the professional growth, knowledge and skills of each person, carrying out the appropriate training for professional updating and any initiative aimed at pursuing this purpose.

Friulforgia Srl promotes the participation of workers in the life of the company, providing participatory tools capable of gathering the opinion and suggestions of workers, guaranteeing their widest participation.

Without prejudice to the maximum availability towards the Company, no worker may be obliged to perform tasks, services or favours that are not due on the basis of their employment contract and their role within the company.

Friulforgia Srl is firmly committed to opposing episodes of mobbing, stalking, psychological violence and any behaviour that is discriminatory or harmful to the dignity of the person inside and outside company premises.

Relations between employees must be conducted with loyalty, fairness, cooperation and mutual respect, in compliance with the values of civil coexistence and personal freedom.

5 COMPANY MANAGEMENT

5.1 Compliance with internal procedures

Friulforgia Srl believes that management efficiency and a culture of control are indispensable elements for the achievement of objectives.

The Code Recipients are required to strictly comply with the company's internal procedures and instructions.

The Code Recipients must act according to their respective authorisation profiles and must keep all appropriate documentation to keep track of the actions undertaken on behalf of the company.

5.2 Accounting Management

In their accounting management activities, the Code Recipients are required to act in compliance with the principles of truthfulness, accuracy and transparency, in order to protect the reputation of Friulforgia Srl both internally and externally.

Compliance with these principles also allows the company to plan its operational strategies according to its real economic and equity situation.

All entries in the accounts must therefore be supported by complete, clear and valid documentation, avoiding any form of omission, falsification and/or irregularity.

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In the case of capital or economic elements based on valuations and estimates, the relative recording must be inspired by criteria of reasonableness and prudence.

All the instruments necessary to direct, manage and verify operating activities are adopted, with the aim of ensuring compliance with laws and internal procedures, protecting corporate assets, efficiently managing activities and providing true and complete accounting and financial data. To this end, a system of internal controls is in place, aimed at verifying and guiding the organisation.

In particular, internal controls

- ascertain the adequacy of the various corporate processes in terms of effectiveness, congruity, consistency, efficiency and cost-effectiveness;
- verify the compliance of behaviour with regulations, as well as with company directives and guidelines;
- they ensure the reliability and correctness of accounting records and the safeguarding of company assets.

Before establishing relations or entering into contracts with suppliers and business partners, Friulforgia Srl ensures the moral integrity and reputation of the counterparty, committing itself to comply with all national and international regulations and provisions on anti-money laundering.

5.3 Relations with customers and suppliers

The Code Recipients shall deal with third parties with courtesy, competence and professionalism, in the conviction that the protection of the company's image and reputation, and consequently the achievement of corporate objectives, depends on their conduct.

In particular, the code Recipients must refrain from any form of unfair or deceptive behaviour that may lead customers or suppliers to rely on unfounded facts or circumstances.

The Code Recipients are required to make constant efforts to offer punctual and high quality services to customers, seeking to limit any form of inefficiency or delay in order to maximise customer satisfaction. What is budgeted must be carried out in a complete, precise and punctual manner.

Relations with suppliers are characterised by loyalty, fairness and transparency.

Suppliers are chosen on the basis of objective criteria of cost-effectiveness, expediency and efficiency.

The choice of suppliers on purely subjective and personal grounds or, in any case, on the basis of conflicting interests is precluded.

1. In procurement relations and, in general, the supply of goods and/or services, employees are required to
2. observe the internal procedures for the selection and management of relations with suppliers;

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3. obtain the cooperation of suppliers in constantly ensuring that customer requirements are met in terms of quality, cost and delivery times

4. observe and enforce contractual conditions and maintain a frank and open dialogue with suppliers, in line with good business practice

5. bring problems arising with a supplier to the attention of management so that the consequences can be assessed.

Code Recipients must put in place every possible control so that suppliers and customers are also able to comply with the fundamental ethical principles set out in this Code.

5.4 Privacy Protection

Friulforgia Srl complies with the requirements on the confidentiality of personal data set out in the regulations.

With reference to this legislation and the processing of employees' personal data, each employee is informed of the nature of the personal data being processed by the company, the processing methods, the areas of communication and takes appropriate measures to ensure confidentiality.

5.5 Asset Company Protection

The employee is required to ensure the utmost respect for the company's infrastructures, means, tools and materials, promptly reporting to his or her supervisor any non-compliant use of such equipment that he or she believes others are making. These categories include, for example, facilities, furniture and furnishings, operating equipment and work equipment, functionalities offered by the company information system (such as processing procedures, software, internet access and databases and the like), books, manuals, newspapers and magazines in general.

Employees are obliged to use the company's equipment only for the performance of the work tasks to which they are assigned. It is therefore strictly forbidden for employees to act with company equipment, whether IT, technical or any other kind, for the pursuit of private ends or interests or in competition with company activities.

Employees are only permitted to use company equipment and/or material outside the company facilities in cases of use for company reasons, such as, for example, business travel to locations other than the usual one, work on secondment, and the like. In all other cases, express authorisation from one's superior is required.

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5.6 Conflict of interest

In order to avoid conflicts of interest, every operation and activity must be undertaken solely and exclusively in the interest of the company and in a lawful, transparent and correct manner.

Employees must avoid all situations and activities in which a conflict may arise with the interests of the company or which may interfere with their ability to make impartial decisions in the interest of the company and in full compliance with the rules of this Code of Ethics. Employees are required to avoid conflicts of interest between personal and family economic activities and the tasks they hold within the structure they belong to.

Any situation that may constitute or lead to a conflict of interest must be promptly reported to the Management.

By way of example but not limited to, it is recalled that the following determine a conflict situation:

1. economic and financial interests of the employee and/or his family exercised in competition or conflict with those of the company;
2. performance of work activities, of any kind, with customers, suppliers, competitors of the company;
3. acceptance of money, favours or benefits from persons or companies that are or intend to enter into business relations with the company.

Given the variety of mentions that may arise, in case of doubt as to whether or not a conflict of interest exists, employees should contact their manager for clarification.

5.7 Gifts

Friulforgia Srl in all business relations is inspired by the principles of loyalty, fairness, transparency, efficiency and competition in the market.

Friulforgia Srl's employees and collaborators, including external collaborators, whose actions may, even indirectly, be referable to Friulforgia, must behave correctly in business and in relations with customers, regardless of the importance of the business being transacted.

It is not permitted to offer money or gifts to directors, officers or employees of customers or their relatives, unless they are gifts or utilities of modest value. In any case, the type of expenditure must be specifically authorised and accurately documented, identified in the accounts and properly processed for tax or other internal control purposes.

Any employee who is offered or receives gifts or gratuities from third parties, which cannot be attributed to normal acts of business courtesy, shall immediately inform his/her superior. In the case of Christmas or other

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gifts intended for individual employees, such gifts shall be brought to the attention of the management, which shall make its own assessment on possible acceptance. External collaborators who are not employees must also comply with the principles contained in this Code of Ethics.

5.8 Accounting Transparency

Every operation and transaction must be properly recorded, authorised, verifiable, legitimate, consistent and appropriate. All actions and transactions must be properly recorded and it must be possible to verify the decision-making, authorisation and execution process. Accounting transparency is based on the accuracy, completeness and authorisation of the basic information for the relevant accounting records. Each employee is obliged to cooperate in order to ensure that management events are correctly and promptly represented in the accounts.

Adequate supporting documentation of the activity carried out is kept for each transaction in order to allow for the easy recording of accounts, the identification of the different levels of responsibility and the accurate reconstruction of the operation, also to reduce the likelihood of errors of interpretation.

Each record must reflect exactly what is shown in the supporting documentation.

All documentation must be promptly and systematically filed so that the relevant accounting picture can be reconstructed at any time: in addition to filing in the appropriate paper binders, if provided for, documents must also be stored in electronic media from which they can be quickly traced and viewed using special document software. In any case, it is the duty of each employee to ensure that the documentation relating to his or her activity is easily traceable and ordered according to logical criteria.

In any case, the company payments to be made shall be exclusively commensurate with the service and modalities indicated in the contract and may not be made to a party other than the contractual counterparty.

The use of company funds for illegal or improper purposes is strictly prohibited.

Payments not based on properly authorised company transactions or illegal forms of remuneration shall not be made to anyone for any reason.

Any neglect, omission or falsification of which employees become aware shall be promptly reported to management.

5.9 Communication

Friulforgia Srl provides the Stakeholders with suitable communication tools through which they can interact with the company to forward requests, ask for clarifications or make complaints. Friulforgia Srl's communication

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with its Stakeholders is based on respect for the right to information; in no case is it permitted to divulge false or tendentious news or comments.

All communication activities respect the laws, rules and practices of professional conduct and are carried out with clarity, transparency and timeliness, safeguarding, among other things, sensitive information and industrial secrets.

Friulforgia Srl promotes effective corporate communication that is able to put the company in contact with civil society, in order to acknowledge instances, needs and requirements of the community and to disseminate its values and mission.

The information disseminated to the Stakeholders is complete and accurate so that the recipients can make correct and informed decisions.

The marketing of Friulforgia Srl only provides information that corresponds to reality and respects ethical values, protecting minors and repudiating vulgar or offensive messages.

5.10 Relation with Authority and Public Administration

Relations with the Authorities and the Public Administration must be based on maximum clarity, transparency and collaboration, in full compliance with the law and according to the highest moral and professional standards. Unless expressly authorised, the Addressees may not have relations in the name and on behalf of Friulforgia Srl with the Authorities and the Public Administration.

In relations with Public Officials, Persons in Charge of a Public Service, and the Public Administration in general, the authorised Addressees shall adhere to the highest levels of correctness and integrity, refraining from any form of pressure, explicit or veiled, or offers of money or goods aimed at obtaining any undue advantage for themselves or for Friulforgia Srl.

In this regard, authorised recipients will be required to strictly comply with the provisions of this Code, as well as, more generally, with the directives issued by the management.

5.11 Relation with political and labour organisation

Friulforgia Srl does not favour or discriminate against any political organisation or labour organisation.

The Company refrains from making any undue contribution in any form to political parties, labour organisations or other social formations, except for specific exceptions and in any case always within the limits of what is permitted by the laws in force.

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The Recipients are required to abstain from any direct, indirect or boastful pressure on political representatives or labour Union representatives.

6 INTERNAL CONTROL SYSTEM AND REPORTING (WHISTLEBLOWING POLICY)

Compliance with the provisions of this Code is entrusted to the prudent, reasonable and careful supervision of each of the Code Recipients, within the scope of their respective roles and functions within the company.

All Code Recipients who suspect or are aware of violations of this Code or violations of anti-corruption regulations are invited to report to their direct superiors any facts and circumstances that are potentially in conflict, using the tools made available to them in accordance with the Whistleblowing Policy.

The top management of Friulforgia Srl shall assess the reports and take all necessary measures to put an end to the violations, and may resort to any disciplinary measures in compliance with the law and workers' rights, including labour organisation rights.

7 STAFF TRAINING AND SPREADING THE CODE OF ETHICS

The Management promotes knowledge of the Code to all Personnel, who are therefore required to observe it and contribute to its implementation.

The Management defines the annual planning of training activities in compliance with the constraints of the Code and manages, with the operational support of designated operators, the training of Personnel on the contents of the Code. The company acquires and records documented information on the training provided to employees.

In this context, communication actions include

- the inclusion of the Code on the Friulforgia Srl. website
- the availability of the Code to all Personnel and distribution to new employees at the time of hiring, with a signature certifying receipt and commitment to knowledge of and compliance with the relevant provisions.

Friulforgia Srl promotes the knowledge and observance of the Code also towards customers and suppliers and all collaborators in any title of the Company.

Friulforgia S.r.l. unipersonale
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33039 Sedegliano (UD)

Cap. Sociale Euro 1.000.000
REA Milano n.1857682
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Cod. Fisc. e P.IVA 05910660967



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Per informazioni, assistenza tecnica e commerciale:

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Sede Legale: Nerviano (MI)

8 SANCTIONS SYSTEM

The internal control system is geared towards the adoption of tools and methodologies aimed at countering potential corporate risks, in order to ensure compliance not only with the law, but also with internal provisions and procedures.

In fact, the violation of the principles set forth in the Code and in the procedures indicated in the internal controls compromises the fiduciary relationship between the Company and its directors, employees, consultants, collaborators in various capacities, customers, suppliers, commercial and financial partners.

Such violations will therefore be immediately pursued by Friulforgia Srl in an incisive and timely manner, through the adoption of appropriate and proportionate disciplinary measures.

The effects of violations of the Code of Ethics and internal protocols must be taken into account by all those who, for any reason, have relations with Friulforgia Srl. Depending on the seriousness of the conduct engaged in by the person involved in one of the unlawful activities envisaged by the Code, Friulforgia Srl will take the appropriate measures without delay, regardless of any criminal action that may be brought by the judicial authorities. Without prejudice to the foregoing, conduct in violation of the Code of Ethics constitutes

- serious breach for employees (blue collars, white collars, middle managers and executives), with the sanctions, applied depending on the seriousness, provided for by the CCNL for the category (verbal reprimand, written reprimand, fine not exceeding three hours' pay, suspension from work and pay up to a maximum of three working days, dismissal for just cause or justified reason) if criminal proceedings are pending or if a measure restricting personal liberty is taken against the employee, before adopting the disciplinary measure, the sanction of suspension from work and pay may be adopted, for the duration corresponding to the outcome of the criminal proceedings or until the end of the duration of the measure restricting personal liberty;
- just cause for revocation of the directors' mandate;
- cause for immediate termination of the relationship, in the most serious cases, for external collaborators and para-subordinates;
- cause for immediate termination of the relationship, in the most serious cases, for suppliers, contractors and subcontractors.

The identification and application of sanctions shall always take into account the general principles of proportionality and appropriateness with respect to the alleged violation.

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In all the aforementioned hypotheses, Friulforgia Srl also reserves the right to take all the actions it deems appropriate to claim compensation for damages suffered as a result of conduct in violation of the Code of Ethics.



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