

Osnago, October 13th 2011

CODE OF ETHICS

TOP GLASS Spa has voluntarily adopted an own Ethic Code inspired to the Universal Declaration of Human Rights.

This code has been reasonably designed to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Compliance with applicable governmental laws, rules and regulations

1.1- Top Glass does not offer, promise, give, demand or accept bribes or other unethical advantage in order to obtain, retain or give business or other advantage.

1.2 -Top Glass employees who have access to privileged information (including proprietary and confidential information, whether belonging to Top Glass or others) must not use it to achieve personal gain for themselves or others

1.3 - All Top Glass employees shall be treated with respect and dignity. Accordingly, any harassment or bullying is unacceptable

1.4 – To Glass is committed to conducting all its activities in a manner which achieves the highest practicable standards of health and safety

1.5 – Top Glass is committed to ensuring that, as far as reasonably practicable, any detrimental effects of its activities, products and services upon the environment are minimized

1.6 – Top Glass Suppliers shall comply with the prevailing laws, customs and usages of their country, the prohibition, in staff recruitment of any discrimination based on race, nationality, sex and religion, the exclusion of child labour or of non-consenting detainees

1.7 – Top Glass adheres to all relevant government guidelines designed to ensure that products are not incorporated into weapons or other equipment used for the purposes of terrorism or abuse of human rights

The present Code of Ethics has been approved by the Board of Directors of Top Glass S.p.A.

Alfonso Branca

Managing Director

TOP GLASS S.p.A.

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