

POLI SRL

ADDENDUM 1 TO THE WABTEC CODE OF CONDUCT

Poli srl (“the Company”) adopts the Wabtec Code of conduct (“Wabtec Code”) in its entirety and also modifies the Wabtec code as follows as applied to the Company:

In Section 2. SCOPE, the Company modifies the Wabtec Code to add the following sentence to the end of the first sentence of the Section:

“Furthermore the WABTEC Code applies to all those persons that directly/indirectly/temporarily/permanently have dealings with the Company, notably the suppliers.”

In Section 2. SCOPE, the Company modifies the Wabtec Code to add the following sentence to the end of the section:

“The Company appointed the Supervisory Body in charge of monitoring the respect of the Code of Business Conduct and of managing the reports/alerts received.”

In Section 2. SCOPE, the Company modifies the Wabtec Code to add the following language to the end of the section:

THE RELEVANCE OF WABTEC CODE TOWARD THIRD PARTIES

All recipients of WABTEC Code in their dealings with third parties must:

- **Correctly inform them about the obligations of the Code;**
- **Require to be in compliance with the obligations of the Code regarding their activities;**
- **Adopt the appropriate initiatives and precautions in order to be in line with the Code**

THE CONTRACT VALUE OF THE CODE

Pursuant to the Italian Civil Code (article 2104), compliance with the Code must be considered a fundamental obligation of the employees. The violation of the Code could affect the employment relationship and could involve damage legal actions. Concerning the suppliers and third parties, the observance of the Code represents a primary requirement for the continuation of the commercial relationship.

In Section 3. POLICY STATEMENT the Company modifies the Wabtec Code to add the following phrase at the end of the paragraph “Corporate opportunities”:
“guided by principles of fairness, transparency and efficiency.”

In Section 3. POLICY STATEMENT the Company modifies the Wabtec Code to add the following language after the paragraph “Diversity and equal opportunity”:

HEALTH AND SAFETY

The Company encourages a safety culture and responsible behaviors, by developing an awareness of the risks in order to guarantee the safety and health protection for all workers.

The Company also undertakes to guarantee the protection of working conditions by protecting the psycho-physical integrity of the worker, by respecting his / her moral personality, by avoiding any illicit conditioning or undue inconvenience.

RESPECT FOR THE ENVIRONMENT

The Company considers the environment as heritage of the community, respects the laws and regulations in force in environmental matters in the countries in which the Company operates and therefore promotes its protection and safeguard, also through an environmental management system in compliance with current legislation.

The Company encourages and promotes corporate behavior aimed at reducing the environmental impact, in particular through the limitation of atmospheric emissions and the reduction of waste.

In Section 3. POLICY STATEMENT the Company modifies the Wabtec Code to add the following language after the paragraph “Confidential information/Electronic information”:

PROTECTION OF INTELLECTUAL PROPERTY

The Company ensures compliance with internal, community and international regulations aimed at protecting industrial and intellectual property.

The Recipients promote the correct use, for any purpose and in any form, of trademarks, images, drawings, licenses, patents and other distinctive signs and of all creative intellectual works, including computer programs and data, to protect the property and moral rights of the author.

In Section 3. POLICY STATEMENT the Company modifies the Wabtec Code to add the following phrase at the end of the paragraph “Relationships with suppliers and vendors”:
“and the Supervisory Body”.

In Section 3. POLICY STATEMENT, paragraph “ Improper payments”, the Company modifies the Wabtec Code to replace the phrase “This prohibition on improper payments extends to government officials and commercial entities” with the following phrase:

“This prohibition on improper payments extends to government officials, commercial entities, Public Administration in general”.

In Section 3. POLICY STATEMENT the Company modifies the Wabtec Code to add the following phrase at the end of the paragraph “Procedures for the receipt, retention and treatment of complaints”:

“or contacting the Body of Surveillance, constituted in compliance with Legislative Decree n. 231, at the email address indicated in the following paragraphs”.

In Section 3. POLICY STATEMENT the Company modifies the Wabtec Code to add the following phrase at the end of the paragraph “Reporting of a violation of this policy or a violation of any law, rule or regulation”:

“or the Supervisory Body”.

In Section 3. POLICY STATEMENT the Company modifies the Wabtec Code to add at the end of the paragraph “Reporting of a violation of this policy or a violation of any law, rule or regulation” the following email address to contact the Supervisory Body:

“Body of Surveillance: pietrocravetto@pec.ordineavvocatitorino.it”.