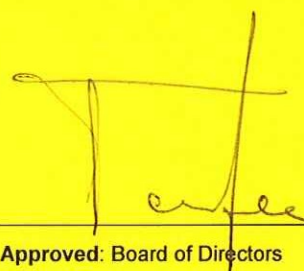


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1. DEFINITIONS

In this document the following expressions have the meaning indicated below:

- **“Addressees”**: corporate organs (directors and control bodies), Employees, Personnel, agents, special attorneys, outsourcers and Partners.
- **“Code of Ethics” or “Code”**: the document, officially desired and approved by the Board of Directors of the Company as an expression of the Company policy, which contains the general principles of conduct - or recommendations, obligations and/or prohibitions which the Addressees must observe and the breach of which is sanctioned.
- **“Company”**: d'Amico International Shipping S.A..
- **“Crimes” or the “Crime”**: the complex of crimes or the individual crime referred to in Legislative Decree 231/2001 (as may be modified and integrated in the future).
- **“Disciplinary System”**: the complex of the sanctioning and disciplinary measures applicable in the case of breach of the rules of procedure and conduct provided by the Model.
- **“Employees”**: all those physical individuals which have a subordinate employment relationship with the Company.
- **“Group”**: for the purposes of this document, Group means d'Amico Società di Navigazione S.p.A., d'Amico International Shipping S.A. and its subsidiaries.
- **“Guidelines”**: the guidelines for the construction of the Models of Organization, Management and Control under Legislative Decree 231/2001, approved by Confindustria (Italian Confederation of Industry) on 7 March 2002 and updated on 31 March 2008, which have been considered for the purposes of the preparation and adoption of the Model.
- **“Legislative Decree 231/2001” or “Decree”**: Legislative Decree n. 231, of 8 June 2001, containing the “regulations on the administrative liability of legal entities, companies and associations even without legal personality pursuant to article 11 of Law n. 300 of 29 September 2000” published in the Official Journal of the Republic of Italy n. 140 of 19 June 2001 and subsequent amendments and additions.

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- **“Operating Procedure”**: the organizational, physical and/or logical measure provided by the Model in order to prevent the commission of Crimes.
- **“Organizational Management and Control Model under Legislative Decree 231/2001” or “Model”**: the Organization, Management and Control Model considered, by the corporate organs, capable of preventing the Crimes and therefore adopted by the Company pursuant to articles 6 and 7 of the Decree in order to prevent the commission of the Crimes by Top Level Personnel or Personnel under the Management of Other.
- **“Partners”**: subjects with whom the Company enters into contact in the performance of business dealings and most specifically subjects which do or do not have a legal autonomy of their own even belonging to the Group. Partners are considered as “Addresses” in the meaning of the present regulations only if includable in the present definition.
- **“Personnel”**: all the physical individuals who have an employment relationship with the Company including the Employees, the temporary workers, the collaborators, the “interns” and the freelance professionals which have received an appointment from the Company.
- **“Personnel under the Management of Others”**: the persons under article 5, paragraph 1, letter b) of the Decree, that is, all Personnel operating under the management or supervision of the Top Level Personnel.
- **“Sensitive Activity”**: the process, operation, act, or series of operations and acts, that might expose the Company to the risk of a Crime being committed.
- **“Supervisory Committee” or “S.C.”**: the corporate body provided under article 6 of the Decree which has the duty of supervising the functioning and observance of the Model, of the Code of Ethics as well as the updating of the same.
- **“Top Level Personnel”**: the persons under article 5, paragraph 1, letter a) of the Decree, that is, the persons who perform functions of representation, administration and management of the Company or one of its organizational units endowed with financial or functional autonomy; in particular, the members of the Board of Directors, the Chairman, the Chief Executive Officer, the members of the Executive Committee (if any), the management, any proxies and the attorneys.

2. PURPOSE AND SPHERE OF APPLICATION

The Supervisory Committee has been established at the Company with the task of supervising and checking the operation, effectiveness, adequacy and observing of the Model adopted by deliberation of the Company's Board of Directors of 12 March 2008 in order to prevent Crimes.

The present regulations, for the correct application of which the Supervisory Committee is responsible, govern the activities of this Committee with respect to the deliberation of the Board of Directors of the Company that created the Model and with it the Supervisory Committee itself.

The S.C. also has the task of supervising the correct application of the Model with specific functions of supervision as regards those infringements that may affect the functionality of the Model itself.

In this regard, respecting the terms established by the law, a part of the activities of the S.C. is established by the Disciplinary System, to which reference is made for matters not governed by the present regulations.

3. OPERATING METHODS

The operating methods and operations of the Supervisory Committee are described in the present chapter.

3.1. Appointing and composition of the Supervisory Committee

In consideration of the specificity of the tasks of the S.C., the relative appointment has been entrusted to a collegial body composed of three members at most, one of whom acting as Chairman, appointed by majority decision by the S.C., unless this function is directly attributed by the Board of Directors of the Company through the deliberation of appointment on members.

The Board of Directors of the Company appoints the members of the Supervisory Committee by means of a specific board resolution.

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The members of the S.C. are chosen from among natural persons, from both inside and outside the Company, who are capable of guaranteeing the following characteristics:

- autonomy and independence, understood as:
 - the functional autonomous subjectivity of the committee itself;
 - possession of autonomous powers of initiative and control;
 - absence of operational tasks;
 - placement in a hierarchical position as a body at the top of the Company, which reports to and is responsible directly to the Board of Directors;
- honourableness, professionalism and expertise, understood as:
 - knowledge of the organization and the main Company processes typical of the sector in which the Company operates;
 - legal knowledge such as to allow the identification of cases liable to configure hypotheses of Crime and the identification and evaluation of the impacts, following from the regulatory context of reference, upon the Company's reality;
 - knowledge of the specialist principles and techniques of the activity performed by Internal Auditing and in general of those who conduct "inspection" activities ¹;
- continuity of action, to be realized through the presence in the S.C. of an internal person dedicated to monitoring the Model.

The possibility is ruled out of appointing as a member of the S.C. any person who:

- is responsible, inside the Company, for other operational tasks ²;
- is a member of a body of the Company that, even though indirectly, has a link with the top management of the Company that is not immune from conditioning;
- represents (in law or in fact) or is a relative of persons that, due to the points stated, are incompatible with the position of member of the S.C.;

¹ Cf. Guidelines, chapter 2.2, page 36. By way of example: statistical sampling, techniques of analysis and evaluation of risks, measures for containing these (authorization procedures, mechanisms for balancing tasks, etc.), flowcharting of procedures and processes for the identification of weak points, interview techniques and the preparation of questionnaires, elements of psychology, methodologies for the identification of frauds, etc...

² Cf. Guidelines, chapter 2.2, page 35. Operational appointment are understood to be those connected with the power to adopt decisions that produce economic-financial effects for the Company.

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- in accordance with the law, has been declared incapable, banned, disqualified, bankrupt, or has been sentenced to a punishment that involves to be banned, also temporarily, from public offices or the incapacity to perform administrative duties ³;
- is a spouse, relative or kin of the Directors within the fourth degree of consanguinity ⁴;
- has provided suretyship or guarantee for one of the Directors (or their spouse) or has credit or debt relations with the latter that are extraneous to the appointment conferred ⁵;
- has been subject to preventive measures ordered by the judicial authority in accordance with Law n. 1423 of 27 December 1956 or with Law n. 575 of 31 May 1965, and subsequent modifications and additions;
- has been convicted with a sentence, even if this is not irreversible:
 - for a crime against the Public Administration or public trust, a property crime, a crime against public order, the public economy or for a crime regarding a taxation matter;
 - for one of the crimes envisaged in title XI of book V of the Italian Civil Code or for bankruptcy crimes;
 - for a crime with intent sentenced to imprisonment for not less than two years.

For each calendar financial year the Supervisory Committee is provided with its own budget to cover the expenses necessary to fulfil its function perfectly as deliberated, together with the final account of expenses of the previous year, by the Board of Directors of the Company. All the expenses in excess of the approved budget must be authorized directly by the Board of Directors. The power of expenditure within the limits of the approved budget is implemented autonomously and independently and in conformity with the processes in force and Company mandates on the subject.

³ Article 2382 of the Italian Civil Code - Causes of ineligibility and loss of rights. "Persons who are banned, disqualified, bankrupt, or who have been sentenced to a punishment that involves to be banned, even temporarily, from public offices or the incapacity to perform administrative duties cannot be appointed as Director, and, if appointed, forfeits that office".

⁴ Article 2399 of the Italian Civil Code - Causes of ineligibility and loss of rights. "The following cannot be elected to the position of auditor and, if elected, they forfeit that office: a) those people who are in the conditions provided for by article 2382; b) the spouse, relatives and kin of the Directors of the Company within the fourth degree of sanguinity, the Directors, spouse, relatives and kin of the Directors of the companies controlled by this, of the companies that control it and of those subject to common control within the fourth degree of consanguinity".

⁵ Cf. Article 51, paragraph 1 n. 3, of the Italian Rules of Civil Procedure - Abstention of the Judge: "The judge has the obligation to abstain...3) if he himself or his wife has a proceeding pending or serious enmity or relations of credit or debt with one of the parties or one of their counsels ...".

3.2. Duration in office and replacement of the members of the Supervisory Committee

In the appointment resolution the Board of Directors determines the duration of the members of the S.C. in office; this is usually for no less than three years (save for justified exceptions).

The members of the S.C. appointed in this way remain in office for the full duration of the mandate received, irrespective of changes in the composition of the Board of Directors that has appointed them.

The members of the S.C. cannot be discharged by the Board of Directors without justified cause. The following represent hypotheses of justified cause for discharge:

- failure to participate in more than two consecutive meetings without justified reason;
- interruption of the working relationship, where the member is also an Employee of the Company or of a subsidiary or allied Company;
- the member being subject to banning, disqualification or bankruptcy proceedings;
- being accused in criminal proceedings of crimes that envisage a punishment involving banning, even temporarily, from public offices or the incapacity to exercise administrative offices;
- discharge of the Board of Directors or one or more members of this following unlawful facts that have produced (or might produce) the liability of the Company and/or of the Directors and that are not reported by the S.C.

With the resolution of discharge of a member of the S.C., the Board of Directors appoints a new member.

Other than in the event of death, those who fall within hypotheses of ineligibility under article 3.1 and those for whom the requisites of autonomy, independence, honourableness, professionalism and expertise envisaged for the position of member of the Supervisory Committee are lacking automatically forfeit the position as members of the Supervisory Committee.

In the event of resignations or automatic loss of a member of the S.C., the latter must notify this promptly to the Board of Directors, who will take the appropriate decisions without delay, appointing a new member as replacement. The Chairman or the most senior member of the S.C. is obliged to notify the Board of Directors promptly of the occurrence of one of the

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hypotheses from which the need to replace a member of the S.C. derives.

Nevertheless, if during the financial year a member of the Supervisory Committee is lost due to resignation or other causes, providing this cessation does not cause the majority of members elected by the Board of Directors to be lost, the other members may replace him by co-opting a person selected by them according to the criteria established by the law. The member of the S.C. co-opted in this way remains in office until the following meeting of the Board of Directors, who then proceed to confirm or replace him with the usual formalities and majorities.

The Supervisory Committee is understood to be disqualified in its entirety if the majority of its members is lost, due to resignations or other causes. In this case, the Board of Directors newly appoints all the members.

3.3. Rules of summoning and operation of the Supervisory Committee

The Supervisory Committee is summoned by the Chairman, or, failing this, when considered appropriate, also by a single member, by notice containing the items on the agenda on which the S.C. will be called upon to pronounce.

The summoning is by registered letter, or by telegram, telefax or electronic mail, provided it is sent using methods that ensure proof of receipt by the addressee, to be sent to each member of the S.C. at least three days before the date established for the meeting or, in urgent cases, at least twenty-four hours before the meeting.

In the absence of the aforementioned formalities, the Supervisory Committee is nevertheless properly constituted if all of its members are present.

For the session of the S.C. to be valid, the presence of the majority of the members in office is required, while decisions are taken with an absolute majority of votes.

Each member of the Supervisory Committee has the right to one vote. In the event of the impossibility of reaching a resolution due to equal votes, the decision on the matter is made by the Chairman of the S.C. ("casting vote").

The meetings of the Supervisory Committee will be held at one of the offices of the Company or elsewhere, provided this is in Europe, in a place agreed among its members, and they may take place even if the participants are spread out over a number of locations, whether adjacent or distant, connected via audio-conferencing or video-conferencing, with formalities

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that must be noted in the minutes. Persons who are not members of the Supervisory Committee may participate in these meetings, with information and advisory functions (e.g. members of the Audit Committee, the auditing company, etc.) provided they are expressly invited by the S.C. and in relation to specific items on the agenda of the meeting.

The Supervisory Committee is chaired by the Chairman, who, in the event of absence or temporary impediment, will be replaced by the oldest member of the S.C..

The functions of Secretary are performed by a member of the S.C. or by a member external to it, named during each meeting of the S.C..

The Secretary holds and updates the books and the archive of the Supervisory Committee and, unless decided otherwise as shown on the minutes, he is also responsible for the successful outcome of the notifications and operations deriving from the decisions taken by the S.C..

The Secretary drafts the minutes of each meeting, which he signs together with the Chairman. The minutes must indicate in summary form the date and time of opening and closing of the meeting, those presents at the meeting, the agenda of the meeting, the discussions on items, the decisions and motivations of the decisions. They do not, however, have to contain any reports received by the Supervisory Committee and the relative preparatory enquiries and/or decisions taken in this regard, which will be contained in the special reports archive. Members of the S.C. who are dissenting with respect to the resolutions of the S.C. may ask for their disagreement and the relative grounds to be noted down in the minutes.

Where a member has a direct or indirect interest with regard to a decision to be taken, the member must communicate his interest in writing in the minutes of the relevant meeting and abstain from voting, with his right to participate in the meeting remaining understood and, only after the communication of his interest, to express his view on the subject. In such cases the decisions of the Supervisory Committee must be justified, also with respect to the interest of the Company. In the event of non-observance of the obligation of abstention, the deliberation is considered invalidly adopted if the necessary majority would not have been reached without the vote of the member of the S.C. who should have abstained.

3.4. Functions and powers of the Supervisory Committee

The Board of Directors has ultimate responsibility for the adoption of the Model and for all the decision-making and operational aspects associated with the organization, management and

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system of internal controls of the Company.

The Supervisory Committee is entrusted with the task of monitoring:

a) the effectiveness and adequacy of the Model in relation to the Company's structure and the actual capacity to prevent the committing of Crimes, and particularly:

- to interpret the relevant regulations;
- to survey the Company activity so as to update the mapping of the Sensitive Activities, also using self-assessment techniques;
- in advance and on the basis of the results of the analysis of crime risks, to evaluate the capacity of the Operating Procedures to prevent Crimes;
- to coordinate with the Company functions in charge of communication and training activities in defining the content of the periodic communications to be made to Employees and to the designated institutional bodies, so as to guarantee all Addressees, in a differentiated manner according to the respective roles and responsibilities, the necessary awareness and adequate knowledge of Legislative Decree 231/2001 and of the Model, monitoring the execution of this;
- to take responsibility for updating the space on the Company's information technologies' network (Company intranet and/or network accessible to the public) containing all the information relating to the Decree and the Model, in collaboration with the Company's functions in charge of this;

b) the observing of the prescriptions of the Model by the designated corporate bodies, the Employees and the other Addressees, in the latter case also through the Company functions with responsibility (effectiveness of the Model) and particularly:

- to make periodic checks on Company documents, procedures or processes in relation to Sensitive Activities, to control the respecting of the Operating Procedures;
 - to coordinate with all the Company functions to implement and manage a system for monitoring the Sensitive Activities that the S.C. decides to make subject to specific checks;
 - to collect, process and hold significant information regarding the respecting of the Model, as well as to update the list of information that must be transmitted or made available to the S.C.;
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- to activate and conduct the internal investigations, liaising on each occasion with the Company's functions concerned, to acquire further elements for investigation purposes;

c) the appropriateness of updating the Model, where needs to adapt it are identified in relation to changed Company's circumstances and/or regulatory conditions and the realization of the updating proposals and particularly:

- on the basis of the results that have emerged from verification and checking activities, to express an evaluation periodically on the adequacy of the Model, as well as on the effective operation of the same;
- in relation to these evaluations, to present proposals periodically to the Board of Directors to adjust the Model to suit the desired situation and to indicate the actions considered necessary for the concrete implementation of the desired Model (fulfilment of procedures, adopting of standard contractual clauses, etc.); particular importance must be devoted to the additions to the systems for managing financial resources (both incoming and outgoing) that are necessary to introduce suitable devices to identify the existence of any atypical financial flows and characterised by greater margins for discretion;
- to check periodically the realization and effective functionality of the corrective solutions/actions proposed;
- to coordinate with the Company's management to evaluate the adopting of possible disciplinary sanctions, with the responsibility of the latter for the inflicting of the sanction and the relative disciplinary procedure remaining understood.

For the purposes of fulfilling the role and function of Supervisory Committee, the aforementioned body is attributed the powers of initiative and control by the Board of Directors, as well as the prerogatives necessary to guarantee it the possibility to conduct the activity of monitoring the operation and observance of the Model and the updating of this in conformity with the prescriptions of the Decree. Furthermore, having taken account of the peculiarities of the responsibilities attributed to the Supervisory Committee and the specific professional contents required by these responsibilities, in carrying out the tasks of monitoring and control, the Supervisory Committee is supported by all the internal Company's functions

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and may also avail itself of the support of external persons whose professional contributions may occasionally become necessary.

The Board of Directors is responsible for evaluating periodically the adequacy of the Supervisory Committee in terms of organizational structure and powers conferred, making the changes and/or additions that are considered necessary, by resolution of the Board.

3.5. Duty of the designated institutional bodies to provide information

The Supervisory Committee reports directly and exclusively to the Board of Directors regarding the implementation of the Model, so as to guarantee full autonomy and independence in performing the tasks entrusted.

The S.C. performs this information providing activity following to each meeting, during the immediately subsequent meeting of the Board of Directors, or half-yearly.

The half-yearly report must have as its object:

- the activity performed, indicating in particular the monitoring conducted and the results of this, the checks conducted and the result of these, and any updating of the evaluation of Sensitive Activities;
- the possible critical issues (and starting points for improvement) that have emerged, in terms both of internal behaviour or events and of effectiveness of the Model;
- the correctives and remedial actions planned and their state of implementation.

In the event of urgency or when requested by a member, the Supervisory Committee is required to report immediately to the Board of Directors regarding possible critical issues identified.

The Supervisory Committee presents the plan of activities for the following year annually to the Board of Directors, and this may be the object of special deliberation.

Minutes of the meetings with the designated institutional bodies, to which the Supervisory Committee reports, must be drafted and a copy of them must be held by the S.C. and by the bodies involved on each occasion. If the S.C. reports on an occasion for which it is necessary to draft the minutes of the Board of Directors, it will not be required to draft minutes in its own meetings book, but a copy of the minutes of the Company's body of reference will be archived by the S.C..

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The Board of Directors and the Chairman of the Board of Directors have the faculty to convene the S.C. at any time, and the latter, in turn, has the faculty to require the convening of the aforementioned bodies for urgent reasons, through the functions or persons with responsibility for this.

The Supervisory Committee must also coordinate with the relevant functions presents in the Company for the various specific profiles.

3.6. Information flows in relation to the Supervisory Committee

The obligation of structured information flows is conceived as an instrument of the Supervisory Committee to:

- monitor the effectiveness and validity of the Model concretely;
- make possible investigations ex post of the causes that have made Crimes possible or contributed to their occurrence;
- improve its activities of planning of the checks.

The obligation to provide information concerns all the Company's functions and divisions, above all those considered at risk of Crime, and firstly the Board of Directors as the top-level body of the Company towards which the information flows from all the other Company's functions and divisions are directed, especially those that are responsible for managing the Company's economic-financial resources.

All the information flows must be supplemented by periodic (at least half-yearly) meetings between the S.C., the Board of Directors and the external auditing company.

The obligations to provide information do not involve the activity of precise and systematic verification by the S.C. of all the phenomena represented in the documents and acts that are sent to it by the various Company's structures, but only of those phenomena that may involve a liability in accordance with Legislative Decree 231/2001.

To this end, the S.C. has free access to the people and to all the Company documentation that it considers significant and it must have the possibility of acquiring significant data and information:

- on the aspects of the Company's activity that may expose the Company to the risk of the committing of Crimes;
-

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- on the relations with the Partners that operate on behalf of the Company in sensitive operations;
- on the Company's extraordinary operations.

The Supervisory Committee must also:

- coordinate with the Company's functions (also through special meetings) to evaluate any need to update the Model;
- activate and conduct internal investigations, liaising on each occasion with the Company functions involved, to acquire further elements for investigation purposes (e.g. for examination of contracts that diverge in form and content from the standard clauses, in order to guarantee the Company against the risk of involvement in the committing of the Crimes, for the application of disciplinary sanctions, etc.);
- indicate to the management appropriate additions to the management systems already present within the Company, to introduce devices that are capable of identifying the existence of possible procedural flows characterised by greater margins of discretion with respect to what is normally envisaged.

3.7. Methods of transmission and evaluation of reports

With reference to the methods of transmission of information, data and news, the following prescriptions apply.

The information flows that have as their object evidence or suspicion of infringements of the Model, the Code of Ethics or other Operating Procedures must be sent in writing to the Supervisory Committee by the Company structures concerned using the methods defined by the S.C. itself, including email to "odv.dis@damintship.com", an address that is only accessible to the members of the Supervisory Committee itself or to the members of its staff, if present.

During its activity, the Supervisory Committee must maintain the maximum discretion and confidentiality regarding the information and news acquired, with the Board of Directors as its only contact for referring the results of investigations.

The Supervisory Committee acts so as to guarantee the authors of the reports against any form of reprisal, discrimination or criminalization or any consequence arising from the reports

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themselves, ensuring confidentiality regarding their identity, yet subject to the obligations of the law and the safeguarding of the rights of the Company or third parties.

Furthermore, the members of the S.C. refrain from seeking and using confidential information for purposes other than those as stated in the Decree and in any case for purposes not in conformity with the functions of the S.C., except in the case of express and aware authorization.

In any event, all information in the possession of the members of the S.C. is treated in conformity with the regulations in force on the subject.

The Supervisory Committee evaluates the reports received and the appropriateness of consequent actions, hearing, if necessary, the author of the report, if known, and/or the person responsible for the presumed infringement. It also takes anonymous reports into consideration, but only if containing serious, precise and concordant elements. Likewise, the anonymous reports will be archived without following up with checks.

In the event of non anonymous reports or however those containing serious, precise and concordant elements, the S.C. will carry out random checks, also through the Company functions, the results of which (also depending on the gravity of the facts that emerge) will be followed by the archiving of the case, the beginning of a sanctioning or disciplinary process and/or reports to the Company bodies.

Where a non anonymous report or one containing serious, precise and concordant elements has a member of the S.C. as its object, the inspection and decision-making activities will be taken on and performed by the other members, provided that they represent the majority.

In this case, it will be the responsibility of the Chairman and/or of the Secretary (depending on the person reported) to inform the Chairman of the Board of Directors, who may participate in the meeting of the S.C. on the matter, to guarantee the correctness of the processes and decisions, also in relation to the member reported.

Where a report containing serious, precise and concordant elements has more than one member of the S.C. as its object, the previous rules apply, provided that the majority of members are not compromised, in which case the S.C. will pass on the matter for the Board of Directors to deal with.

3.8. Gathering and storage of information

Each record, information item, report or inquiry is held by the S.C. for a period of 10 years in a special section of the Company's file server and/or in a special paper archive.

The access keys to the paper archive are only provided to the members of the Supervisory Committee and to the Secretary, when he is external to it, and these must immediately be returned at the end of their mandate, for whatever reason this may occur.

Access to the electronic documents of the S.C. with power to read and write, is permitted exclusively to its members and the Secretary; when he is external to it, he is allowed access until the end of his mandate, for whatever reason this may occur.

The bodies and control functions of the Company may view, upon motivated request, the minutes of the meetings of the Supervisory Committee, while the reports and preliminary investigations may be consulted exclusively by the members of the S.C. and by the Secretary, when he is external, since they contain confidential information (vital records of the reporting persons).

The archive of reports and preliminary investigations must contain the reports and preliminary investigations regarding the infringements of the Model or an Operating Procedure. The archive must contain information regarding:

- the progressive number;
- the date of receipt of the report;
- the reporting person (if indicated);
- the object of the report;
- the investigation resulting from the report;
- provisions regarding the checks conducted;
- any corrective and/or disciplinary proposals.

Reports are dealt with at the meetings of the S.C., following the conducting of investigations into the case, previously requested to the competent internal functions by the Supervisory Committee.

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The Supervisory Committee is qualified and has autonomous powers of self-regulation, by amending these regulations and/or by envisaging further and different Operating Procedures. Where the Operating Procedures and/or the amendments to these regulations have an impact on the activities of Company's functions, on the administration and/or management of the Company, or on matters that fall within the authority or responsibility of the Board of Directors, they must be approved by the Board of Directors itself, who may reject them, giving its justification, or in any case they must follow the Company's standard procedures for approval, notification and training.