



Enable Consulting s.r.l.

Code of Ethics

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1. Introduction

The Code of Ethics (hereinafter the "Code") describes the set of principles and rules of behaviour that Enable Consulting s.r.l. (hereinafter "Enable Consulting" or "Company") has decided to adopt in carrying out its activities and its relationship with all parties ("Stakeholders").

The document contains principles and rules, which are designed to ensure compliance with any rule of law and the adoption of ethical and fair behaviour on the part of all corporate officers and all those who, for whatever reason, working for the Company, even if only occasionally.

The adoption of the Code, by Enable Consulting, takes into account the contents of the Decree. 231/2001, which introduced into our legal system a form of administrative responsibility, but essentially criminal, to the Company if they are committed crime in its own interest or for its benefit. The Decree contains a strong system of penalties against guilty companies, but also provides that the Code of Ethics, as part of an effective model of organization, management and control, can take up a protection force for the benefit of Company.

GENERAL PROVISIONS

2. Recipients

The principles and provisions of the Code of Ethics are binding and must be observed by the directors and all persons bound by an employment contract with Enable Consulting, as well as by any person acting on behalf of the Company, both in Italy and to 'abroad, whatever the relationship, even temporarily, that binds them to Enable Consulting, including those who are representatives, administration or management, or staff and external consultants acting on behalf of the Company.

All the subjects mentioned above are hereinafter collectively referred to as "Recipients".

3. Adoption and communication of the Code of Ethics

This Code of Ethics has been approved by the Board of Directors of Enable Consulting.

The Company shall inform all of the provisions and application of the Code, demanding a full and consistent adherence.

In particular, through the distribution of copies thereof to the Recipients and communicating any future developments that the Code may have.

The updated version of the Code of Ethics is always published in the Company's website at <http://www.enableconsulting.it>

GENERAL PRINCIPLES

4. General ethical principles

Enable Consulting conducts its activities in compliance with EU legislation, national and international, rejecting corruption and any illegal practice.

The Company's principle, consequently, is respect for laws and regulations in Italy and in all countries in which it may operate.

Any conduct contrary to the legislation and to this Code of Ethics, by the Recipients, even if motivated by the pursuit of an interest of the Company, may not be justified and requires the adoption of sanctions.

The Company considers its image and reputation values to be protected and developed through full dissemination, sharing and observance of ethical principles and behaviour of this Code.

5. Responsibility

The Recipients perform their own job with professional commitment, diligence, efficiency, transparency and fairness, using the best information and tools they have available, assuming the responsibilities of their commitments.

The Recipients are also in agreement with the principles of that Code, making themselves available for any checks that are necessary without putting any restrictions.

6. Impartiality

In its relations with all Stakeholders, Enable Consulting avoids any form of discrimination based on age, sex, health, disability, race, nationality, ethnic origin, sexual orientation, religious beliefs and political opinions, following criteria of objectivity, transparency and impartiality.

In the management of all activities and decisions, Recipients must therefore act with impartiality in the best interest of the Company, taking decisions with professionalism and objectivity and applying neutral evaluation criteria.

7. Honesty, integrity, loyalty

Enable Consulting operates in compliance with laws and professional ethics. The pursuance of interests the Company can never justify a contrary to the principles of fairness and honesty.

All professional activities by Recipients must be conducted with honesty, integrity and loyalty, towards third parties or others who work with Enable Consulting.

Behaviours not in compliance with these principles or justification about acting in the interests of the Company are totally rejected.

8. - Respect and protection of the person

Enable Consulting puts the respect for the person in evidence.

According to this perspective, the Company guarantees the physical and moral integrity of all individuals who are to cooperate with it, so that they feel free to act in accordance with the guiding principles of this Code of Ethics, prohibiting any form of pressure, violence, threat to induce people to act at variance with the provisions of the law and the principles contained in the Code.

9. Privacy

Enable Consulting provides, in accordance with the reference regulations, the confidentiality of information in its possession in the most rigorous observance of current legislation on protection of personal data.

Recipients ensure maximum confidentiality of news and information related to corporate assets or the business of Enable Consulting and must not use or disclose confidential information relating to the Company or any third party, of which they have acquired in the performance of professional activities, for personal purposes and not related to the exercise of such activities.

Recipients cannot take advantage of direct or indirect, personal or financial, by the use of confidential information.

The communication of information to third parties, with the exception of what established by the laws, should be made only by authorized parties and in this case must be clearly indicated the confidentiality of information, and required the same observance of confidentiality also by those who receive the information itself.

10. Conflict of interest

In carrying out their duties, the recipients should avoid activities, behaviours and actions incompatible with the obligations arising from their relationship with Enable Consulting or other positions held by them, which would lead to a possible conflict of interest in the choices made.

The Recipients must inform, without delay, the Chairman of the Board of Directors of the Company about situations or activities in which they, or their close relatives, may have conflict of interest with Enable Consulting.

11. Free competition

The Company believes that a healthy and fair competition system is a key factor in ensuring the continuous growth and business improvement. Enable Consulting follows the rules of competition in the countries where it operates and refrains from engaging in behaviours that could suggest or stimulate an unfair competition.

For this reason, the Recipients must refrain from behaviours that may be qualified in that sense.

12. Gifts, presents and benefits

The Company will not permit any form of gift that could be interpreted as exceeding the normal business practices or courtesy, or as aimed to have favourable treatment in the conduct of any activity connected to Enable Consulting.

This requirement concerns both the gifts promised or offered as well as those received, with no exceptions, even in those countries where offering valuable gifts to business partners is a common practice.

13. Transparency of Budget and Accounting

Enable Consulting considers the transparency of financial statements and accounting principles as essential in conduct of its business and observes the rules of correct, complete and transparent accounting, according to the criteria set by the relevant legislation and accounting regulations.

Recipients are required to send timesheets as accurate as possible about their professional activities and any expenses incurred, approved in advance in accordance with the regulations and instruments implemented by the Company.

Recipients are directly responsible for the truthfulness of information reported in their reports and documents.

14. Protection of company assets

All Recipients must respect, protect and preserve the values and assets received by Enable Consulting for the performance of their professional activity.

It is not allowed, if not for the exclusive benefit of the Company, to use resources, goods or materials owned by the same.

Using the Company computing resources it must take care not to use e-mail for purposes other than business use and not access Internet web sites with indecent or unlawful content.

RELATIONS WITH THIRD PARTIES

15. Relations with the Public Administration

Relations with the Public Administration, Public Authorities and Public Institutions are inspired by principles of fairness, impartiality and independence and are reserved exclusively to the President of the Board of Directors, or the C.E.O., or other persons, who have been formally delegated by an explicit mandate, that are not in situations of conflict of interest with respect to the representatives of the institutions themselves.

Gifts and acts of courtesy to the representatives of governments, public officials and public employees are allowed when they are of modest value without compromising the reputation of either party, and they cannot be considered as aimed at influencing judgments or to gain undue advantages.

In cases where third parties have to deal with the Public Administration on behalf of Enable Consulting, it must be applied, against them and against their teams, the same guidelines applied to the Company.

Anyone who is in any way aware of the violation of these restrictions shall give immediate notice to the Chairman of the Board of Directors of the Company.

16. Relationships with customers and suppliers

The perception that customers have about Enable Consulting products and services is crucial in the Company's strategic vision, as driver to consolidate and increase the position in the market.

In relations with clients primary objective of the Company is to maximize the degree of satisfaction, with a strong focus on the needs of customers and potential customers, through excellence of products and services offering and on the availability to ensure immediate and qualified response to requests.

In relations with clients, Recipients behaviours are based on maximum fairness, honesty, professionalism, transparency and confidentiality, avoiding conflicts of interest.

In the selection suppliers, Enable Consulting follows the principle of maximum competitive advantage together with that of the highest quality, avoiding any form of discrimination and granting to each supplier the opportunity to participate in the signing of contracts. The Company reserves the right not to maintain relationships with suppliers that, in the performance of the business, have adopted behaviours that are not in line with those provided in this Code of Ethics.

17. Relations with trade unions and political parties

Every relationship between Enable Consulting and trade unions, political parties and their representatives must be based on the highest principles of transparency and fairness. Any kind of contribution will be allowed by the Company only if required and expressly permitted by law, provided that there are not evidences of a conflict of interests and always pre-authorized by the President of the Board of Directors or by the C.E.O.

Any contribution made by the Recipients, as well as any activity they provide, must be understood solely as their personal and voluntary action, without any advantage taken by the Company.

18. Relations with the media

The information and external communications must be fair, clear and consistent, without prejudice to the need for confidentiality.

The reports of the Company with the media are reserved exclusively to the persons responsible, or to the Recipients expressly authorized, and must be carried out consistently with the corporate strategies of communication.

Any participation, in the name or on behalf of the Society, to events, committees and associations of any kind, be they scientific, cultural or class, must be authorized in advance.

FINAL PROVISIONS

19. - Violations of the Code of Ethics

All Recipients, customers, suppliers and those who have relationships with Enable Consulting must be aware that the Company represses behaviours that violate the rules and principles of the Code of Ethics, with appropriate disciplinary sanctions, in accordance with law and the national contract applicable, regardless of whether criminal proceedings have arisen in cases where breaches of the Code of Ethics could constitute a crime.

Enable Consulting reserves the right not to maintain relationships with employees, customers, suppliers and third parties in general, that not wishing to operate in strict compliance with regulations or who refuse to behave according to the values and principles in the Code of Ethics.

20. Disciplinary sanctions for breaches

The violation of rules and principles of the Code of Ethics affects the relationship of trust existing between Recipients and Enable Consulting and implies disciplinary actions, regardless of the presence of a penal trial in case that the violation constitutes a crime.

This is also in accordance with the principles of timeliness and immediacy of the disciplinary complaint and the imposition of sanctions, in accordance with the laws in force.

The sanctions applicable to the Recipients are therefore as follows:

- For subjects with employment relationship with the Company, compliance with the Code of Ethics is an essential part of the contractual obligations assumed by them under and for the purposes of Article 2104 of the Civil Code, and therefore, the behaviour they kept, in violation of rules of conduct reported in the Code of Ethics, is considered non-compliant with the primary obligations of the employment relationship and are also disciplinary offenses toward contractual rules (in particular CCNL and supplementary company contract where applicable).

The type and extent of the penalties provided for under existing contractual provisions will be applied taking into account:

- intentionality of behaviour or degree of negligence, carelessness or inexperience highlighted;
 - the overall behaviour, with particular regard to the existence or absence of prior disciplinary action;
 - the functional position and duties of the person involved;
 - details of other relevant circumstances.
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- In the case of Directors, non-compliance with the Code of Ethics shall be promptly reported to the Board of Directors of Enable Consulting for the proper evaluations and actions. In the presence of proceedings against one or more Directors, which are alleged perpetrators of the crime from which the administrative responsibility of the Company, the Chairman of the Board of Directors of Enable Consulting will proceed with the convening of the Shareholders to approve the termination of the mandate.
 - In the case of Employees or persons having business relations with the Company, whatever the relationship which binds them to the same, even if occasionally, failure to comply with the Code of Ethics may be considered non-performance of contractual obligations, with each legal consequences, in order to terminate the contract or mandate and may lead to compensation for damage suffered by Enable Consulting, both in terms of image and damages, that will be evaluated in the appropriate forums.

Attachment 1a

The undersigned _____,
claims to have received a copy of the Code of Ethics in place in Enable Consulting s.r.l.
and to fully agree the items it contains.

Place _____

Date _____

Signature

Attachment 1b

The undersigned _____,
legal representative of _____,
claims to have received a copy of the Code of Ethics in place in Enable Consulting s.r.l.
and to fully agree the items it contains.

Place _____

Date _____

Signature
