

Organisation, Management and Control Model pursuant to
Italian Legislative Decree 8 June 2001, no. 231

ANNEX CODE OF ETHICS



LEVER
TOUCH
WE SKILL AUTOMOTIVE

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Foreward

LEVERTOUCH S.P.A. has been in the “car repair” business for over 27 years, offering its customers the best repair and maintenance solutions for any vehicle, from a single car to an entire fleet.

Its rapid and constant growth has made it possible, however, to consolidate significant work experience in relation to contacts with a variety of ever-changing contexts. This complex scenario has made it necessary to define and make explicit the moral and ethical values on which to base its identity: transparency, innovation, social and environmental responsibility, respect for the rights of the individual and the value of human resources, and a commitment to achieving a sustainable society, for the planet and for people.

With the intention, therefore, of promoting the observance of these values and to spread awareness of them at every level, both inside and outside the company, it was deemed necessary to adopt and publish a Code of Ethics outlining the main rules of conduct.

LEVERTOUCH S.P.A., moreover, ensures the in-depth study and updating of this Code in view of regulatory developments, the provision of every possible cognitive and clarification tool regarding the interpretation and implementation of the rules contained therein; finally, it undertakes to carry out checks on each report of violation of the Code, to assess the facts and, in the event of ascertained violation, the consequent adoption of the relevant sanctioning measures.

1. Introduction

1.1 Business ethics

Ethical behaviour was defined by Immanuel Kant as that of one who acts without hope of reward or fear of punishment, guided only by the will to treat one's neighbour as an end and not as a means to an end.

When this individual reflection passes on to the much broader organisational and corporate sphere, ethics merges with the concept of Corporate Social Responsibility, which for LEVER TOUCH S.P.A. is configured as a commitment to combine its business with respect for and protection of the interests of all those involved in it and the safeguarding and preservation of the planet's resources, considering all these elements, therefore, as the purpose of its work and not as a means to obtain profit.

The Code of Ethics of LEVERTOUCH S.P.A. is not intended to enhance the Company's reputation: responsibility and fairness, as well as the quality of the services offered, are a prerequisite for its existence. The essential purpose of the Code is to make it clear that in every day-to-day action, multiple and diverse rights, interests and duties come into play, and that, as it looks to the future, LEVER TOUCH S.P.A. aims to compete with dignity and integrity, making its contribution to a more responsible and mature market.

Article 41 of the Italian Constitution states: ***"Private economic enterprise is free. It may not be carried out against the common good or in such a manner that could damage safety, liberty and human dignity. The law shall provide for appropriate programmes and controls so that public and private-sector economic activity may be oriented and coordinated for social purposes."***

Based on this principle, LEVER TOUCH S.P.A. imagines its own path towards ***"sustainable development"***.

1.2 Mission

LEVERTOUCH S.P.A. intends to become a leader in the "car repair" sector, proposing cutting-edge solutions and services centred on the skills and know-how of highly specialised personnel and on innovative techniques aimed at satisfying every need in the sector, from body repair to mechanical and electronic maintenance. All of this is done to the most exacting quality standards, aiming for total customer confidence. We also aim to develop the most professional and specialised structures on the market and to have offices and facilities in the strategic points indicated by our customers, in order to respond promptly to their needs.

1.3 Vision

LEVER TOUCH S.P.A.'s goal is to become a world leader in the "car repair" sector and a partner of the best professionals in the automotive industry, providing services to car manufacturers as well as integral solutions to weather and environmental claims (for insurance companies and private customers) and maintenance services for large fleets (Rac, Renting, Corporate customers).

This is all thanks to training and proximity, and to the support of various factors, such as the consolidation of the LEVERTOUCH S.p.A. Academy and LEVERTOUCH S.p.A. IT Solutions, the implementation of the structure and capillarity of the strategic plan, and the sharing of know-how with private customers, passing on the benefits of technology, quality and economy of scale.

2. General principles

The Code of Ethics of LEVER TOUCH S.P.A., approved by the company's Board of Directors, identifies a set of values and constitutes the main reference for the daily actions of all the company's collaborators in conducting business and carrying out the company's activities.

We are firm in our conviction that, for our activity to qualify as ethically correct, we must aim to achieve production models that honour and protect human rights, the Earth's ability to renew itself, and the wellbeing of communities, encouraging human development in a fair and sustainable manner. To this end, we adopt a business ethic that harmonises value creation with sustainable development, with environmental protection, social cohesion, the development of a favourable labour relationship and consistent communication as the main objectives.

We consider the UN Universal Declaration of Human Rights, the International Labour Conventions and Recommendations issued by the ILO (International Labour Organisation), the Earth Charter drawn up by the Earth Council, and the principles set out in the Global Compact proposed by the UN as indispensable points in the definition of our values; and we believe in them to the extent that we orientate the "migration" of our activities and services by inspiring them with the parameters and criteria of the ESG (Environmental Social Governance) protocol.

The principle of Sustainability is complemented by that of Corporate Responsibility on the basis of which we have integrated strategies into our business processes in order to foster social, environmental as well as economic development.

2.1 Environmental

LEVER TOUCH S.P.A.'s commitment to the planet is to preserve its prosperity and beauty for today's and future generations; environmental responsibility is at the heart of the way we act and work. We always keep in mind the environmental

impact aspect of our business and strive to provide a service that always respects the ecosystem. We have applied for and obtained ISO 14001 certification, which is not compulsory but the result of a voluntary choice to implement and improve our environmental management system. This certification demonstrates that the Company has and uses an appropriate management system to keep the environmental impacts of its activities/services under control, systematically seeking improvement in a consistent, effective and above all sustainable manner.

Our ambitious approach to sustainability is based on assessments that, given its importance, have the main objective of identifying the most relevant environmental, social and governance issues in our business in the short, medium and long term. We take into account the expectations of customers and all stakeholders by combining them with a focus on risks, opportunities, trends and best practices in our industry.

We prioritise topics such as renewable energy, sustainable transport (like our MOBILITY SERVICE), energy efficiency, waste reduction and proper waste management, increased recycling and the circular economy.

We are therefore committed to implementing, developing and maintaining environmentally friendly activities and services, implementing a systematic approach to identify, manage, reduce and responsibly dispose of or recycle waste; responsibly identify, manage, reduce and control air emissions from our activities that may pose a hazard to the environment; and quantify, set targets, monitor progress and reduce consumption of fossil fuels, water, hazardous substances and natural resources through conservation, reuse, recycling, substitution or other measures.

To ensure that our sustainability intentions are grounded in our daily work, we use sustainable processes outlined by a selection of objectives, an evaluation of results and a regular analysis of our activities.

2.2 Social

Our primary aim is to ensure that people and workers, on which our moral and professional mission is based, are assured the respect and dignity that is rightfully theirs. We are decisively and consciously mindful of our responsibility in the protection of human rights, which we put into practice through the observance of ethical principles towards our employees and all those who have relations of any kind with LEVER TOUCH S.P.A. and through the integration of all rights at all levels of our operations.

LEVER TOUCH S.P.A. ensures a safe and secure working environment for every employee and everyone who comes into contact with the company. The company supports employment growth and gender equality in the company: it identifies through the Code of Ethics a conduct aimed at developing the value of each individual, taking into account his or her physical, cultural and moral integrity, equality and inclusion as values of the corporate culture.

We do not allow any kind of discrimination or exclusion, including and especially with regard to culture, ethnicity, religion, nationality, age, gender, political opinion, marital status, sexual orientation, health or disability, and, on the contrary, we welcome people of all backgrounds into our team, in the belief that everyone can make the work environment multifaceted, original and better.

We are committed to ensuring that all our employees are treated fairly, guaranteeing equal opportunities at all stages of their professional life, from recruitment to promotion, and ensuring that employment decisions are based solely on observations related to actual activity, guided only by the employee's ability to perform.

We stand for the freedom of association of workers and recognise the right to collective bargaining. We undertake never to use forced labour or child labour, even indirectly, and to disapprove of any form of discrimination in recruitment procedures and human resources management. We are firm in our condemnation of all forms of bullying and exploitation, and we recognise merit, job performance and the professional potential of each individual as the criteria for determining wages and career development.

We firmly believe in the value of communication: in the interest of the company and its employees, we are attentive to employee feedback and believe that improvement can only be achieved through a direct relationship of employees with their managers. We also provide our resources with appropriate, secure and discreet access to complaint systems and corrective measures.

3. The code of ethics

In order to ensure that the values of LEVERTOUCH S.P.A. are shared both inside and outside the company, the Company has adopted the Code of Ethics: compliance with the rules set out therein is an essential element for the proper functioning, reliability and image of the Company and is therefore required of both employees and external collaborators.

The provisions, principles and rules set forth in this Code of Ethics supplement the conduct that all LEVER TOUCH S.P.A. personnel are required to observe in the performance of their work under applicable law and the applicable National Collective Agreement in force. LEVER TOUCH S.P.A. undertakes, towards all recipients of the Code of Ethics, to:

- *disseminate its knowledge by making it available to all recipients, including through appropriate training programmes;*
- *ensure its periodic review in order to adapt it to evolving civil awareness and current legislation;*
- *adopt an adequate system of sanctions to repress possible violations of the provisions of the Code of Ethics;*
- *adopt adequate procedures for reporting, verifying and responding to possible violations;*
- *ensure the confidentiality of the identity of whistleblowers, without prejudice to legal obligations; periodically verify compliance with the Code of Ethics by its recipients.*
- *The following are part of the management's ethical vision of the management of the company:*
- *moral responsibility towards all stakeholders, public and private, in relation to the effects and consequences of the activity carried out by the company, which has a purely public purpose;*
- *the care of the fiduciary relationship with the Public Entity, in the sense of the obligation to exercise one's autonomous capacity of judgement and choice regarding recommended strategies and implementation decisions, so as to favour and promote the main and only interest of the public res.*

4. *Recipients of the Code of Ethics*

The principles, conduct and rules of the Code of Ethics represent the rules that apply, without exception, to all employees of LEVERTOUCH S.P.A. and to all those who, directly or indirectly, permanently or temporarily, establish relationships and relations with it, or work to pursue its objectives, (hereinafter, the “Recipients”).

The Code of Ethics is an integral part of the employment relationship; all recipients consequently undertake to:

- *act in line with the Code of Ethics;*
- *report all violations of the Code of Ethics to the Supervisory Board (SB) as soon as they become aware of them;*
- *adequately inform third parties of the obligations imposed by the Code of Ethics, demand compliance and take appropriate action in the event of non-compliance.*

5. *Approval of the Code of Ethics*

The Code of Ethics was approved by the Administrative Body and subsequently, in order to allow for a more flexible adaptation of the document to situations that were highlighted during the management of the crime prevention model pursuant to Italian Legislative Decree 231/2001, or to ensure a more timely adaptation to new requirements arising from legislative amendments to the same Italian Legislative Decree 231/2001, the procedure for amending and approving the Company's Code of Ethics is as follows, without prejudice to the full autonomy of the Administrative Body to make changes and updates at any time it deems appropriate:

- ***The Supervisory Board periodically reviews the Code of Ethics, with particular reference to the requirements resulting from intervening legislative changes, and proposes any amendments and additions to it;***
- ***the Administrative Body examines the proposals of the Supervisory Board and, if it agrees with them, approves the Code of Ethics as amended, which therefore becomes immediately operational for the Company.***

6. *Ethical Principles and Criteria for Conduct*

Introduction and objectives

In addition to adopting the Code of Ethics, and confirming the Company's desire to maintain a firm direction towards transparent and perfectly legal operations, it has also adopted an Organisational Model pursuant to Italian Legislative Decree No. 231 of 8 June 2001.

In addition to generating greater organisational clarity to roles and responsibilities, further transparency in corporate management and better management of controls over business operations, the Management, Organisation and Control Model (MOGC), pursuant to Italian Legislative Decree 231/2001, contributes to the dissemination of corporate values and culture.

Mission

Commitment to uncompromising ethical conduct aimed at maintaining a solid and recognised reputation of the company without territorial limits.

Value of Reputation and Fiduciary Duties

A "good reputation" is an essential intangible resource for the Company. Externally, it fosters approval by the market to which it refers, which specifically is represented by the "Stakeholders", the attraction of the best human resources, the satisfaction of internal employees themselves and all partners with whom they do business.

Value of Reciprocity

This Code of Ethics is marked by an ideal value of cooperation with the main objective of safeguarding the absolute mutual respect and benefit of the parties involved and preventing the commission of offences of the kinds contemplated by the aforementioned Italian Legislative Decree 231/2001.

It therefore requires its stakeholders to act according to principles and rules inspired by a similar ideal of ethical conduct and in full compliance with applicable laws and regulations.

7. Ethical Principles

It is oriented towards a business model capable of generating value at all levels, supporting and developing a healthy supply chain inspired by the following principles:

Impartiality and Equality

In decisions affecting relations with its stakeholders (customer/user management, work organisation, supplier selection and management), it avoids any form of discrimination based on age, gender, health, race, nationality, political opinions and religious beliefs of its stakeholders.

The rules concerning relations with customers, suppliers, consultants, employees, public services and all stakeholders are the same for all. Equality is to be understood as the prohibition of any unjustified discrimination and not the pursuit of uniformity of benefits in terms of personal and social conditions. In particular, the company takes all necessary initiatives to adapt the way it provides its services to the needs of users with disabilities.

The Company inspires its conduct, towards all, with criteria of objectivity, justice and impartiality.

Legality and Transparency

The Company, in the performance of its activities and in relations of any kind and nature, has as its objective the protection of legality and the transparency of its work, therefore, all collaborators are required to diligently comply with the laws in force, the Code of Ethics and internal regulations.

Under no circumstances may the pursuit of the Company's interest justify any action that does not comply with an honest and loyal line of conduct.

Continuity

The company's activity and the resulting provision of complementary services is continuous, regular and uninterrupted. The Company intervenes anywhere in the world within a period of 24 to 48 hours.

Protection of information

LEVERTOUCH S.P.A. ensures the confidentiality of the information in its possession and refrains from seeking confidential data, unless expressly and consciously authorised and in accordance with the applicable legal provisions. Company employees are bound not to use confidential information for purposes unconnected with the performance of their duties.

Value of Human Resources

The employees of LEVERTOUCH S.P.A. are an indispensable success factor.

For this reason, the Company protects and promotes the value of human resources in order to maximise their degree of satisfaction and increase the wealth of skills possessed.

Quality of services

LEVER TOUCH S.P.A. orients its activities towards the satisfaction and protection of its customers/users as well as the appreciation of the community in which it operates.

For this reason, the organisation develops its activities according to high quality standards.

Fairness in cases of conflict of interest

Situations in which those involved in transactions are, or may even appear to be, in conflict of interest are avoided in the conduct of any activity.

8. Conduct Criteria

The following rules of conduct do not claim to exhaust all cases and forms in which the principles are to be applied. Instead, they establish precautionary conduct with respect to typical cases in which so-called opportunistic behaviour may materialise, which would jeopardise compliance with the principles in the relationship between the company and one or more of its **stakeholders**.

Information processing:

Stakeholder information is treated with full respect for the confidentiality and privacy of those concerned.

Gifts and presents:

No form of gift, gratuity, promise of future benefits exceeding normal business practice or courtesy, and in any case aimed at acquiring favourable treatment in the conduct of the envisaged activities, is permitted.

Such conduct is particularly recommended when dealing with Italian and foreign public officials, their relatives and relatives-in-law.

The same rules apply to gifts and gratuities received from employees or the Administrative Body. The personnel of LEVER TOUCH S.P.A. may not, directly or indirectly, offer or receive gifts, money, presents, for any reason whatsoever, whether of a material or immaterial nature that may appear connected with existing business relations.

Communication to the outside world:

Communication with its stakeholders is characterised by respect for the right to information; under no circumstances may false or biased news or comments be disseminated.

All communication activities comply with the laws, rules and practices of professional conduct, and are carried out with clarity, transparency and timeliness.

Personnel management:

Personnel management is carried out as described below.

Establishment of the employment relationship:

Personnel is employed under a regular employment contract; no irregular work or “moonlighting” is tolerated.

At the establishment of the employment relationship, each employee receives accurate information on:

- characteristics of the function and tasks to be performed;
- normative and salary elements, as regulated by the national collective labour agreement;
- rules and procedures to be adopted in order to avoid conduct contrary to the law.

This information is presented to the employee in such a way that acceptance of the assignment is based on an effective understanding.

Managing the employee

Each manager is obliged to value the working time of employees by requiring performance consistent with the performance of their duties and work organisation plans.

It constitutes an abuse of authority to request, as a due act from a hierarchical superior, services, personal favours or any behaviour that constitutes a violation of this Code of Ethics.

The involvement of employees in the performance of work is ensured, also by providing for participation in discussions and decisions functional to the realisation of corporate objectives.

The employee must participate in these moments in a spirit of cooperation and independent judgement.

Each manager fully utilises and enhances all the professional skills present in the structure by activating the available levers to foster the development and growth of his or her personnel.

The company makes information and training tools available to all employees with the aim of enhancing specific skills and implementing the professional value of personnel.

There is institutional training provided at certain times in the employee’s corporate life and recurrent training for operational personnel.

Personnel evaluation:

LEVERTOUCH S.P.A. avoids any form of discrimination against its employees. Within the personnel management and organisation processes, decisions are based on the correspondence between expected profiles and the profiles possessed by employees.

The appraisal of employees is determined with the involvement of the personnel function, the relevant managers and, as far as possible, all persons who have come into contact with the appraisee.

The personnel function, within the limits of the information available, also takes appropriate measures to avoid favouritism, nepotism, or forms of patronage in the evaluation.

9. Worker's rights:

Workers' rights are protected as described below:

Safety and health at work:

LEVER TOUCH S.P.A. is committed to spreading and consolidating a health and safety culture by developing risk awareness and promoting responsible behaviour by all employees.

To this end, it implements interventions of a technical and organisational nature, through the introduction of:

- an integrated management system of risks, safety, resources to be protected;
- control and updating of working methods;
- training and communication interventions.

Privacy protection:

The employee's privacy is protected by adopting standards specifying the type of information to be requested from the employee and how it is to be processed and stored.

Any investigation into the ideas, preferences, personal tastes and, in general, the private life of employees is excluded.

These standards also provide that, except in cases provided for by law, personal data may not be disclosed or disseminated without the prior consent of the person concerned.

Protection of the person:

LEVERTOUCH S.P.A. is committed to protecting the moral integrity of its employees by guaranteeing the right to working conditions that respect personal dignity. This is why it safeguards workers from acts of psychological violence, and counteracts any attitude or behaviour that is discriminatory or harmful to the individual, his/her beliefs and preferences.

Employees who believe they have been harassed or discriminated against on the grounds of age, sex, race, state of health, nationality, political opinions and religious beliefs, etc., may report the incident to the Personnel Manager, who will assess the actual violation of the Code of Ethics.

10. Duties of the worker

The worker's duties are set out below:

Conduct criteria:

The employee must act loyally, in compliance with the obligations entered into in the employment contract and the provisions of the Code of Ethics, ensuring high standards to the services rendered.

He/she shall absolutely avoid conduct that could damage company assets, company management, stakeholder relations and the company image.

Use of company assets:

Each employee is required to work diligently to protect the company's assets, through responsible conduct in line with the objectives and operating procedures set out to regulate their use, and to accurately document their use.

LEVER TOUCH S.P.A. reserves the right to prevent misuse of its assets and infrastructure through the use of appropriate control systems.

Conflict of interest:

All collaborators of LEVERTOUCH S.P.A. are required to avoid situations from which conflicts of interest may arise (e.g. co-interest with suppliers or customers) and to refrain from taking personal advantage of business opportunities of which they have become aware in the course of their duties.

In the event that even the appearance of a conflict of interest arises, the employee is required to notify his/her supervisor, who, according to the established procedures, informs the Administrative Body, which assesses its actual existence on a case-by-case basis.

Information management:

The employee must know and implement the provisions of the company's information security policies to ensure the integrity, confidentiality and availability of information. He/she is required to draft his/her documents using clear, objective and exhaustive language, allowing for any verifications by colleagues, managers or authorised external parties.

11. Criteria of conduct in relations with Customers/Users

Contracts and communications to customers/users

Contracts and communications to customers/users must be:

- clear and simple, formulated in a language as close as possible to that normally used by interlocutors;
- compliant with applicable regulations, without resorting to elusive or otherwise unfair practices;
- complete, so that no element relevant to the customer's decision is overlooked.

Purposes and recipients of the communications determine, on a case-by-case basis, the choice of the most suitable contact channels for the transmission of content, undertaking not to use misleading or untruthful advertising tools.

Behaviour of employees with customers/users

LEVER TOUCH S.P.A.'s style of conduct is characterised by helpfulness, respect for laws and regulations and courtesy, with a view to a collaborative and highly professional relationship.

The company's collaborators, be they employees, suppliers, partners or consultants, within the scope of the activity and any management of the services rendered, must adopt behaviour that avoids the occurrence of offences covered by Italian Legislative Decree No. 231/2001.

Quality control and customer satisfaction

LEVER TOUCH S.P.A. is committed to guaranteeing adequate quality standards of the services offered, also monitoring the level of quality perceived by the customer.

12. Criteria of conduct with Suppliers

Choice of supplier

Purchasing processes are characterised by the pursuit of high and efficient service standards, equal opportunities for each supplier, fairness and impartiality. Therefore, the employees in charge of these processes are requested not to preclude anyone - in possession of the necessary requirements - from competing for contracts, and to adopt - when choosing the shortlist of candidates - objective and documentable criteria, without prejudice to compliance with the relevant legislation in force.

Integrity and independence in relationships

The conclusion of any contract, agreement or partnership must always be based on criteria of extreme clarity and avoid creating forms of mutual dependence.

Therefore:

- any contract of a significant amount must be constantly monitored;
 - it is not considered correct to induce a supplier to enter into a contract that is unfavourable to him/her by giving him/her the impression of a later, more advantageous contract.
- To ensure maximum transparency and efficiency in the purchasing process, LEVER TOUCH S.P.A. provides:
- the separation of roles between the unit requesting the supply and the unit concluding the contract;
 - adequate reconstructability of the choices made;
 - the retention of information as well as all documents relevant to the management of the relationship.

Ethical behaviour in procurement

Violations of the general principles of the Code of Ethics entail sanction mechanisms, also aimed at preventing offences against the Public Administration. Appropriate clauses are provided for this purpose in the body of individual contracts.

13. *Criteria of conduct with Communities and Institutions*

Social policy

LEVER TOUCH S.P.A. pursues objectives consistent with those of community development and the environment in which it operates. This is based on the knowledge that community satisfaction is one of the organisation's goals as well as a competitive advantage.

Relations with parties, trade unions and associations

LEVERTOUCH S.P.A. does not finance parties in Italy or abroad, their representatives or candidates, nor does it sponsor congresses or parties that have an exclusive purpose of political propaganda.

It refrains from any direct or indirect pressure to political figures (e.g. acceptance of reports for recruitment, consultancy contracts).

LEVER TOUCH S.P.A. undertakes to cultivate and maintain relations with trade union organisations in compliance with current legislation in a spirit of transparency and cooperation. Discrimination and/or favouritism on the basis of membership of trade unions, associations and/or political parties and the profession of political, party or religious beliefs is not permitted.

Institutional relations

All relations with local, national and international public institutions that are part of normal administrative activity are oriented towards criteria of transparency and fairness, avoiding attitudes of a collusive nature.

14. *Stakeholder Reports*

All stakeholders may report, in writing and not anonymously, any violation or suspected violation of the Code of Ethics to the Supervisory Board, which will analyse the report, possibly hearing the author and the person responsible for the alleged violation.

It is the duty of the Supervisory Board to act in such a way as to guarantee “whistleblowers” against any kind of retaliation, understood as an act that may give rise even to the mere suspicion of being a form of discrimination or penalisation (for example, for suppliers: termination of business relations; for employees: failure to promote, etc.). The confidentiality of the reporter’s identity is also ensured, without prejudice to legal obligations.

15. *Violations and revisions*

The Supervisory Board reports violations of the Code of Ethics, which have emerged as a result of stakeholder reports or activities carried out independently, together with any suggestions deemed necessary, to the Administrative Body in relation to the extent of the violation.

They are responsible for:

- taking decisions on violations of the Code of Ethics;
- expressing opinions on the revision of the most relevant policies and procedures, in order to ensure their consistency with the Code of Ethics;
- providing for the periodic review of the Code of Ethics.



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