



Purchasing Services Italy S.r.l.

**Code of Ethics pursuant to Legislative Decree 231/2001
supplementary to the Group Code of Conduct**

*FIRST APPROVAL BY
THE BOARD OF DIRECTORS ON **01.09.2015***

Premise and recipients

The Code of Conduct of the IKEA Group ("Code of Conduct of the Group") aims to define the values and behavioral principles that inspire IKEA Purchasing Services Italy S.r.l. (hereinafter also "the Company") and the other Group Companies in the performance of their activities and in achieving their objectives and interests.

The purpose of this Code of Ethics is to integrate this Group Code of Conduct, specifying additional specific control principles regarding the types of offenses envisaged by Legislative Decree 231/2001.

The document in question binds all those who perform functions of representation, administration or management, or exercise, even de facto, the management and control of the Company, all employees without exception, collaborators (including, by way of example only, consultants) and whoever entertains with IKEA Purchasing Services Italy Srl business relationships (hereinafter also the "Recipients").

Recipients must know the provisions of this Code of Ethics and all Company employees are required to actively contribute to its dissemination; to this end, this document is also brought to the attention of the collaborators, as well as to anyone who has business relations with the Company.

Since 2000, each Group company has issued the document "IWAY standard", an acronym for "IKEA WAY on products, materials and services", which defines the minimum requirements to be met (from an environmental point of view, working conditions and social, etc.) in the purchase of products, materials and services.

Group Code of Conduct, Local Integrative Code of Ethics and standard IWAY therefore represent the ethical documentation that determines the principles that are suitable for preventing the unlawful conduct referred to in Legislative Decree 231/2001.

Relations with Public Officials

Any contact, including those of a commercial and / or administrative nature, with both the national and international Public Administration must be based on compliance with existing legal provisions and guarantee the principles of transparency, honesty and fairness, in order not to compromise the integrity and the reputation of the Company.

Personnel delegated to maintain, on behalf of the Company, relations with Public Officials, in Italy or abroad, cannot in any way influence decisions in an improper or illegal manner (for example, soliciting, accepting, paying or offering sums of money or any other benefit, directly or through third parties, in exchange for favors, fees or any other advantage for themselves or for the Company), also upon induction of the public official or public service representative.

In particular, in relations with the Public Administration (Italian or foreign), public officials and / or public service appointees, it is strictly prohibited:

- Maintaining a conduct aimed at proposing or generating employment opportunities or any other form of service or / and business opportunity, as well as any activity for the benefit of the public official and / or public service representative;
- Carry out all actions aimed at soliciting or obtaining confidential information from the Public Administration;
- Perform any act that may lead the public official and / or the public service officer to violate the applicable legislation.

The recipients of the Code of Ethics must act in compliance with the law, cooperating fully and actively with the representatives of the Public Administration, such as the Judicial Authorities, those charged with Public Service, Public Officials or Public Administration Officials, in carrying out the activities entrusted to them.

Personnel delegated to maintain relations with Public Administration representatives are forbidden to provide false, incomplete or misleading statements or misinterpretation of the facts. It is also forbidden to destroy or modify deeds, minutes, accounting records or conceal, in whole or in part, facts for which it would have been necessary to make a declaration.

It is understood that the above may be undertaken in accordance with the ethical principles and procedures adopted by IKEA Purchasing Services Italy Srl, provided that in no way can it be interpreted as an attempt to obtain favors and / or represent a conduct prohibited by this Code.

The same principles apply to any purchase or participation in charitable initiatives, regardless of the form in which they are implemented.

Private bribery

The Company eschews recourse to any form of corrupt practice, without any distinction and regardless of the pursuit, even exclusive, of the interest or advantage of the Company.

In particular, the Company prohibits its employees and collaborators from any action aimed, directly or indirectly, at promising and / or unduly paying money or other benefits to a private third party in order to obtain from the latter the fulfillment or omission of acts, in violation of the obligations inherent to the office or the obligations of loyalty of the same.

Compliance with anti-money laundering legislation

The Company carries out its activity in full compliance with all national and international laws and regulations regarding money laundering, as well as the provisions issued by the competent Authorities (including Legislative Decree 231/07, Law No. 186 / 2014 and other relevant provisions). To this end, it undertakes to refuse to carry out suspicious transactions in terms of fairness and transparency.

By virtue of this line of conduct, the Company asks all Recipients of this Code to operate in such a way as to avoid being involved or involved in transactions that

are potentially, even potentially, conducive to the laundering of proceeds from criminal and illicit activities in any form or manner, as well as personal conduct that could be qualified in terms of anti-money laundering.

Management of gifts and donations

The Company undertakes not to offer or accept gifts, favors, refunds and invitations to lunches, dinners or other events, to or by third parties, if this constitutes a violation of the law and / or of the Code of Conduct of the Group, avoiding all situations that may affect professional judgment during the course of their work on behalf of the Group or third parties.

It should be noted that for the management of gifts, donations and sponsorships, the Company refers to what is described in the "IKEA Group Standard on Community Involvement".

Occupational health and safety

The Company's primary objective is the respect and application of the current accident prevention legislation, together with the information and training of its workers in order to maintain and improve the conditions of the work environment, the safety and health of its own employees, of all those who for various reasons work for the Company.

All persons, in the context of their duties and responsibilities, must know, promote and enforce the cardinal principles of accident prevention contained in the Code, through the involvement and motivation of colleagues.

The Company's personnel and all those involved in various capacities are required to observe the existing legal provisions on the subject, the internal procedures aimed at protecting the health and safety of everyone in the framework of their responsibilities.

Environmental Protection

IKEA Purchasing Services Italy S.r.l. considers the protection of the environment and the sustainable development of the territory in which it operates to be of primary importance, in consideration of the rights of the community and future generations.

The Company directs its action of environmental protection on the basis of the awareness that the environment is a common good to be safeguarded and promotes awareness-raising activities on this issue, committing to train its collaborators so that they are aware of the environmental aspects and impacts connected to their own activities.

In particular, in carrying out activities related to waste management, the Company pays attention to protecting the environment and preventing negative impacts on it, also by applying specific practices and procedures to ensure that the management of the activities is compliant with corporate policy and environmental objectives, in compliance with applicable regulations.

Dissemination of the Code of Ethics

The Company is committed to ensuring the maximum dissemination of ethical documentation, also through the use of appropriate cognitive tools, training and awareness regarding its contents.

With regard to employees, adequate training and awareness-raising activities are also envisaged aimed at promoting awareness of the principles and ethical rules in conjunction with similar initiatives defined at Group level in relation to the Code of Conduct adopted.

Violations and sanctions consequences

Compliance with the rules contained in the ethical documentation must be considered an essential part of the contractual obligations to which all Employees, Collaborators in the Company and Recipients all are bound, in the context of the relationship maintained.

The violation of the principles contained in the ethical documentation constitutes non-fulfillment of these obligations and will be sanctioned in accordance with the provisions of the Organization, Management and Control Model regardless of their possible criminal relevance.

It is the duty of the Board of Directors, in collaboration with the Supervisory Body, to ensure that the principles of the Code of Ethics are respected.

All employees and collaborators, in the event that they become aware of alleged violations of ethical documentation or of behavior that does not comply with the adopted rules of conduct, must immediately inform the company contact person and / or the Bodies set up for this purpose on the basis of current legislation.

Approval of the Code of Ethics and related amendments

This Addendum was approved by the Board of Directors of IKEA Purchasing Services Italy S.r.l.

Any changes and / or updates to the same will be approved by the Board of Directors and promptly communicated to the Recipients.