



# our code of ethics

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introduction  
by our ceo

**FITT is a leader in the development of solutions for the transfer of fluids - for domestic, professional and industrial use - designed to improve people's lives and the professional activities of customers and clients.**

FITT has been designing and manufacturing systems using pipes, fittings and accessories made from thermoplastic material with a high technological and design content for 50 years to ensure reliability, safety and performance to customers and end users.

**FITT has started an important transformation process: FITT now aims to become a recognised brand and is capitalising on its industrial, cultural and market leadership built up over the years.** Turnover of more than €230 million in 2016, 72% in the foreign market, with a workforce of 850 throughout Europe, 6 production sites in Italy and 3 abroad, 11 logistics sites in Italy, France, Spain, China and Poland. 6 subsidiaries in Italy, France, Spain and China. In recent years FITT has transformed itself into an industrial multinational company that acts and competes in a global marketplace.

This has obviously led to a strong increase in the complexity of our action, by imposing more stringent standards of conduct and capable of effectively responding to new and multifaceted external factors and to the demands of customers increasingly concerned about social and environmental aspects.

How have we managed this growing complexity? Our strength, in addition to the quality of what we produce, has always been commonality, the journey together towards goals that we set ourselves. You can't get anywhere now alone: united, comparing ideas and sharing resources, we will realise our dreams: **I BELIEVE THIS.**

We began the path of change giving us a **Vision to 2023**. The project aimed at identifying new company values sprang from this, developed with a bottom-up process, common to the whole group. Crucial in this new vision was the centrality of the individual and of working together positively and proactively. An ambitious path, strongly structured around inner participation, which involved a multidisciplinary team of 18 people who met and interviewed 500 members in more than 20 structured meetings to arrive at the identification and definition of **FITT's Company Values**:

#Respect  
#Teamwork  
#Responsibility  
#ThinkPositive  
#Be Brave



FITT's effort was not restricted to declaring these values, but at the same time we embarked on a real journey of improvement within each business activity. Each area, building on the identification of values, has identified and structured its scope for improvement and the corresponding growth path.

The same approach has been adopted for the drafting of the **Code of Ethics**, involving 22 colleagues representing all the business activities. Together we identified general **ethical principles and the code of conduct to be adopted in respect of the various stakeholders** and the code of conduct to be adopted in respect of the various stakeholders (collaborators, customers, suppliers, public administration, community) in order to establish and maintain a high-level relationship in the long term with all interested parties. We did not want our Code of Ethics to be a mere implementation of Legislative Decree No. 231/2001 but instead, **for our company it was a corporate social responsibility instrument and a way of seizing new opportunities for growth.**

ABY applying the Code of Ethics to our daily work, **we want to develop the ability in all of us to help ensure that our business is always conducted in a responsible and sustainable way and at the same time we want to encourage behaviour that promotes sustainable growth, spreading a real culture of accountability and integrity.**

Henceforth, FITT's Code of Ethics will not only enable our stakeholders to have an image of our profile and our ethical content, but **it will provide us with an even stronger identity and will help us to tackle everyday tasks and challenges with greater certainty, united by intentions and enthusiasm.**

I hope that each of our stakeholders can make this Code of Ethics their own when performing their tasks, thus contributing to the **continuous strengthening of confidence in our company.**

**This is how FITT's spirit will manifest itself!**

Alessandro Mezzalira  
Alessandro Mezzalira CEO of FITT S.p.A.



our  
values



We have built our values according to a bottom-up approach in which we involved all levels and all business activities.

## RESPECT

We nurture our relations with others, we take into consideration the diversity and ideas of everyone in our company.

## TEAMWORK

We work together to build the future. Collaboration and sharing ideas and practices are part of our daily work.

## RESPONSIBILITY

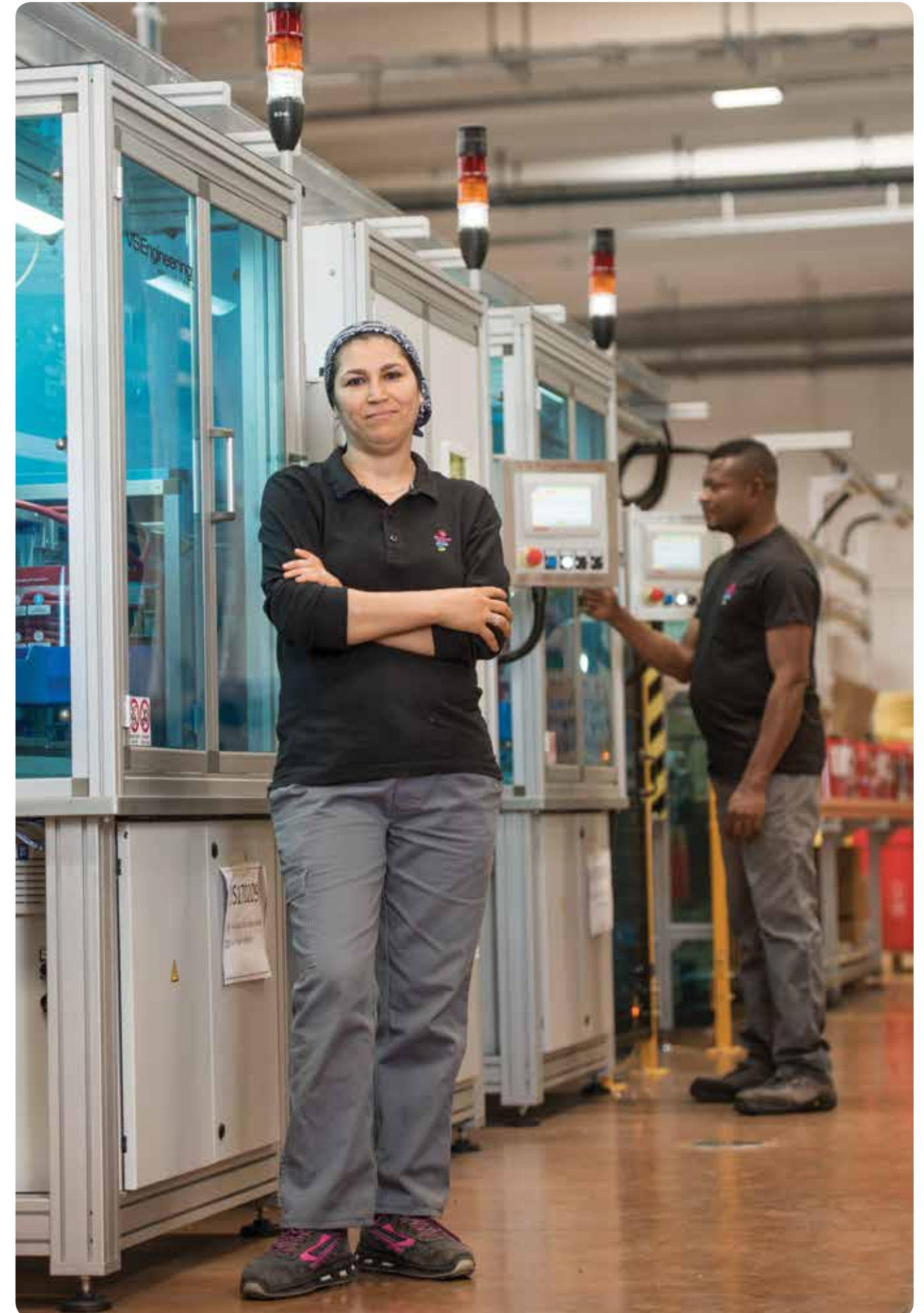
We are all involved in the company's success. Each of us is responsible for our own role.

## THINK POSITIVE

We love what we do, and we believe in the future which is why we all work together. We face common challenges with a positive approach.

## BE BRAVE

The future that we want to build is challenging and we want to tackle it with energy and courage.





recipients of the  
code of ethics



The recipients of this Code of Ethics are the directors, statutory auditors, executives and employees of FITT as well as all those who directly or indirectly, permanently or temporarily, establish relationships and relations with FITT, each within the scope of their respective roles and responsibilities.

The recipients must abide by the laws and regulations applicable in the various geographical contexts in which FITT operates and tailor their behaviour as set out in this Code of Ethics.

The recipients are also required to know and respect, in relation to the role performed and the level of responsibility assumed, the company procedures applicable to them.

This Code of Ethics is valid in Italy and abroad, here reasonable finding application in relation to the different regulatory contexts and various cultural, political, social, economic and commercial realities of the various countries in which FITT operates.







our ethical  
principles

By ethical principles we mean:

- Specify the general terms of the 'social contract' between our company and other stakeholders;
- Ensure that, taking the principles in their entirety, relations with stakeholders are managed fairly;
- lay the foundations to derive a more concrete code of conduct.

## Value of the person

The protection of the individual is the prerequisite cornerstone of our organisation, meaning both respect for the individual in their physical and moral integrity, and the improvement and growth of each internal resource.

We promote and defend the fundamental rights of the people and we reject every form of discrimination based on gender, race, political, religious and sexual orientation, social and personal conditions

## Listening, respect and openness to dialogue

We are willing to cooperate in the construction of a pleasant work environment. An environment where relations between people are held in high regard and, listening and respect for opinions and harmony are a daily commitment by everyone, in all that we do. We nurture the relations that we develop with others, we take into consideration the diversity and ideas of everyone in our company.

## Commonality and shared responsibility

We promote collaboration and the sharing of ideas and practices in order to build the future together. We expect reciprocity of behaviour from our partners. The company's success is determined by the actions each and every one of us is responsible for, when performing our role.

## Integrity and transparency

We promote legality, honesty, fairness and impartiality in all behaviour inside and outside of the company, developing relations of trust with customers, commercial partners, suppliers and any other stakeholders. All our relations and activities are guided by respect for the principles of transparency, fairness, loyalty, good faith and completeness of information.



## Correctness and absence of conflicts of interest

The principle of fairness requires all recipients of our Code of Ethics to avoid being in any situation of a conflict of interests, and, if this happens, to refrain from any action, indicating the presence of a conflict of interests to their line manager.

Within the scope of our organisation, a conflict of interest is a discrepancy between the interest of the individual and the company's interest that occurs when conduct may cause an advantage to the person who performs the work or any other figure - directly or indirectly via a third party close to them - and therefore at the same time harming the company's interests.

With reference to the specific case of gifts, directors and employees of our company can only accept those covered by normal commercial relations and courtesy which exclude those aimed at obtaining favourable treatment when conducting any activity that may be linked to FITT. Gifts not in line with this rule must be rejected.

## Confidentiality and privacy

We assure the confidentiality of the information in our possession and we refrain from seeking, disclosing or using confidential data, except in the case of explicit authorisation from the owner of such information and in compliance with the rules in force.

Directors, employees and collaborators of our company must behave with the utmost confidentiality even outside of working hours, in order to safeguard know-how and sensitive company data in all business sectors (for example, with reference to information on technical, financial, legal, administrative, commercial and personnel management matters, etc.). This applies in particular to those who are in possession of confidential and relevant information because of their duties.

## Anti-corruption

We reject any form of offer, action, promise of money, goods or other benefits from or to third parties that can be, even if only indirectly, interpreted as exceeding normal expressions of courtesy accepted in commercial practice or whose purpose is to obtain favourable treatment. The only forms of commercial courtesy allowed are those contained within limits such as not to compromise the integrity and ethical/professional correctness of the parties concerned.



## Fair competition

We observe competition rules and we abstain from behaviour that may include forms of unfair competition. We condemn every form of fraudulent conduct and/or aimed at altering the rules of free competition. We reject any conduct aimed at committing offences and expressly ban any form of agreement - both with company employees and with third parties - aimed in any way at pursuing illegal objectives.

## Anti-money laundering

FITT, must not in any way and under any circumstances, be involved in matters relating to laundering money derived from illegal or criminal activities. FITT undertakes to comply with all the rules and regulations, both national and international, on the subject of money laundering.

## Financial integrity and accounting transparency

The accounts shall be kept in an accurate, complete and timely way in order to provide a faithful representation of the economic and financial situation and the management activity.

Each operation must be supported by adequate, clear and complete documentation, which must be kept with documents and must be easily available and such as to allow, at any time, a check of the reasons for and characteristics of the operation itself. In particular, no payment can be made without adequate supporting documentation.

We only allow access to information to all those who are legitimately interested in knowledge of business events to perform their tasks. We guarantee the observance of the law and we undertake not to operate any form of direct or indirect financing, and will not assist groups or associations pursuing illicit purposes in any way.

## Research, innovation and industrial and intellectual property

We promote research and innovation by management and employees, within the scope of the roles and responsibilities covered. The intellectual assets generated by this innovative activity constitute

FITT's core essential assets. We try to respect the content of any form of intellectual property that is ours or that belongs to third parties, whether it comprises copyrights, patents, trademarks, designs, trade and/or commercial secrets and any other intangible asset.



## Respect for human rights

In the development of both our activities as an international company and those in participation with partners, we are committed to protecting and promoting human rights.

We reject any sort of discrimination, corruption, forced or child labour. We particularly take into consideration the recognition and protection of the dignity, freedom and equality of human beings, the protection of labour and of trade union freedoms, health,

safety and the environment. In this regard, we operate in the framework of the United Nations Universal Declaration of Human Rights and the Fundamental Conventions of the ILO - International Labor Organization.

## Environmental protection

The environment is a primary asset that we strive to safeguard. To this end, we are committed to reducing the environmental impact of our activities as well as preventing risks for the environment not only in respect of current legislation, but taking account of the development of scientific research and the best experiences in the field.

We strive to protect the environment in all our activities, using processes, technologies and materials that reduce energy consumption and that of natural resources, by avoiding or reducing the impacts arising from business activities in terms of pollution, greenhouse gas emissions, waste production and problems for local communities.

We promote awareness-raising activities and environmental training in-house together with the diffusion of eco-efficient technologies and circular economy projects.

## Health and safety in the workplace

The protection of health and safety of workers is a primary value for us.

We strive to spread and consolidate a culture of health and safety, developing awareness of the risks, promoting responsible behaviour by all workers.

In addition, we aim to maintain the highest levels of protection of health and safety for our employees and ensure the necessary prevention and protection measures and avoid or minimise occupational risks.

All recipients of our Code of Ethics, irrespective of their role, are asked to recognise risks and contribute to maintaining a healthy and safe working environment in which they operate, ensuring the safety of their colleagues and collaborators, through active participation in health and safety management.

We are committed to spreading the culture of health and safety in the workplace towards zero accidents involving all staff in information and training activities and more generally in the management system.



## Compliance with the laws and regulations applicable in the countries in which we operate

We consider compliance with the laws and regulations in force in all the countries in which we operate as a binding and essential condition of our actions. Therefore, we endeavour to comply with these regulations as well as generally recognised practice. FITT strongly believes in respecting legality and, for this reason, in no case can the pursuit of business interests justify conduct contrary to the laws and rules indicated herein.

Since the content of national laws may differ, we also want to recognise some fundamental ethical principles, shared at international level. In particular, we undertake to respect the ten principles of the UN Global Compact, i.e. the principles that the United Nations recommend to companies on the subject of human rights and workers' rights,

respect for the environment and the fight against corruption. These principles are universally shared as derived from the Universal Declaration of Human Rights, the ILO Declaration, the Rio Declaration and the United Nations Convention against corruption. We also reject the involvement with persons exercising illegal activities or financed with capital from an illegal source.



## Human rights

### Principle I

Companies should support and respect universally recognised human rights within their respective spheres of influence; and

### Principle II

ensure that they are not complicit in human rights abuses.

## Work

### Principle III

Companies should uphold the freedom of association of workers and recognise the right to collective bargaining;

### Principle IV

the elimination of all forms of forced and compulsory labour;

### Principle V

the effective abolition of child labour;

### Principle VI

the elimination of all forms of discrimination in respect of employment and occupation.

## Environment

### Principle VII

Companies should support a precautionary approach to environmental challenges;

### Principle VIII

undertake initiatives to promote greater environmental responsibility; and

### Principle IX

encourage the development and dissemination of environmentally-friendly technologies.

## Anti-corruption policy

### Principle X

Companies undertake to work against corruption in all its forms, including extortion and bribery.



our code  
of conduct

# Code of conduct in relations with employees and internal staff

## Protection of the individual

We guarantee the physical and moral integrity of employees and collaborators, as well as working conditions and environments respectful of individual dignity and health and safety in the workplace.

We do not tolerate any form of irregular work or abuse of particular types of collaboration, such as to avoid the application of legislation on the matter.

We guarantee, in accordance with the provisions of the law, the confidentiality of the information in our possession. We prohibit the use of confidential data for purposes other than those for which they were communicated unless we have the express consent of the person concerned and in any case always in the strictest observance of the legislation on privacy and the internal company rules.

The protection of information and sensitive data contained or stored in computer media is ensured through the adoption of appropriate security measures for this purpose.

## Relations between colleagues

Every FITT employee and collaborator is required to assume an attitude in respect of their colleagues geared towards respect, protection of the dignity of the person and collaboration.

Respect for roles and collaboration must also characterise the relationship between manager and employee, avoiding any form of abuse by the manager and insubordination by the employee.

## Management and development of human resources and equal opportunities

We strive to offer, in full compliance with the law and contractual matters, all employees and employees fair regulatory and remuneration treatment solely based on merit and competence, without discrimination.

The competent functions are required:

- to base in all cases any and all decisions pertaining to human resources solely on considerations of merit, skills, experience and professionalism;
- to select, recruit, train, remunerate and manage human resources in all cases without any sort of discrimination;
- to create a working environment in which personal characteristics or orientations cannot give rise to discrimination and capable of promoting the peace of mind of everyone at FITT.

## Protection of company assets

We make staff responsible for operating with diligence in order to protect, preserve and keep our company's assets and resources, entrusted to them in the context of work and to use them properly and in accordance with the company's interest, prohibiting any misuse.

Employees and collaborators are committed not only to protecting assets, but to preventing the fraudulent or improper use, for their own benefit, that of third parties or even of FITT.

## Protection of company secrets

FITT's activities constantly require the acquisition, preservation, processing, communication and dissemination of news, documents and other data relevant to negotiations, administrative procedures, financial transactions, know-how (contracts, deeds, reports, notes, studies, drawings, photographs, software, etc.) that cannot be made known for contractual agreements or whose inappropriate or untimely disclosure could damage the company's interests.

Without prejudice to the transparency of the activities implemented and information obligations imposed by the provisions in force, employees and collaborators of FITT ensure are obliged to ensure the confidentiality required by the circumstances for any news learned as a result of their job.

Information, data and knowledge acquired or processed during their work or by means of their duties belong to FITT and may not be used, communicated or disclosed without specific permission from the person responsible in respect of the specific procedures.

## Alcohol, tobacco and drugs

All FITT employees personally contribute to promoting and maintaining a climate of mutual respect in the working environment; particular attention must be paid to respecting one's own safety and that of co-workers.

In particular, the following are prohibited:

- possessing, consuming, offering or selling drugs, alcohol or substances with a similar effect, for any reason, during work and in workplaces;
- Smoking in workplaces, even where it is not forbidden by national law.

## Protection of the company's image and reputation

FITT's image and reputation is an asset that employees and collaborators must protect with their behaviour in every situation, taking into account the evolving social context, technology (e.g. email, Internet, social media) and new tools available. Stating the freedom of opinion of each contributor and the choices made by the company, everyone's behaviour must be geared towards safeguarding FITT's reputation.





# Code of conduct in relations with suppliers

## Impartiality and independence in the selection and approval of suppliers

We guarantee a relationship of fair competition between suppliers. The selection is made based on criteria which are as objective and transparent as possible, as provided for by internal procedures. Respect of the principles contained in this Code is a necessary condition to establish or continue the commercial relationship.

Within our company, we must comply with the internal procedures for the selection and management of the relationships with suppliers and undertake not to obstruct any supplier with the requisites to contribute to a specified supply.

## Correctness of relationships with suppliers

Purchase processes are based on pre-contractual and contractual behaviour geared towards essential and mutual loyalty, transparency and cooperation.

The remuneration accorded to suppliers is exclusively commensurate with that supplied. We draft written agreements with suppliers.

We undertake to:

- ask suppliers - during the contract definition phase - to share any information that would ensure we and the suppliers respect any commitments made, thus avoiding any misunderstanding;
- Include compliance with the principles of FITT's Code of Ethics in contracts with suppliers;
- keep us free from any personal obligations towards suppliers: any personal relationships between employees and suppliers must be reported to the line manager before any negotiation;
- immediately report any attempt to alter normal commercial relationships to the line manager.

## Confidentiality

We undertake not to externally disclose information on suppliers that is of a confidential and strategic nature, asking the same reciprocal behaviour from suppliers.

## Anti-corruption

We are careful to respect intellectual property rights, regardless of whether it concerns our company or third parties. Therefore, we seek to ensure, together with our suppliers, that none of the products proposed to FITT constitute or involve any form of falsification of existing patents, models, designs, trademarks or other proprietary rights or pending approval.

# Code of conduct in relations with customers, end consumers and professionals

## Customer satisfaction and compliance with commitments

Our activities are aimed at customer satisfaction and protection, offering products, services and solutions that meet their expectations and any agreements made.

We are also committed to respecting the right of consumers to not receive any harmful products for their health and physical integrity. For FITT, health and safety, respect for human rights and the environment are constitutive elements of its offer.

## Fairness and impartiality

Our contractual relations are based on correctness, transparency, truthfulness and fairness, by prohibiting the exploitation of any conditions of others negotiating weakness or lack of knowledge of facts and conditions to improperly influence customers during any negotiation. We undertake not to arbitrarily discriminate against our customers.

## Transparency and completeness of information

We are committed to fully informing customers, end consumers and professionals on the characteristics, features and prices of products and services through clear and not misleading communications, so that customers and consumers can make informed decisions.

## Data protection and customer confidentiality

We guarantee that the information in our possession relating to customers, consumers and professionals are managed and used in full respect of the rights of persons and of existing legislation.

## Anti-corruption

We are careful to respect intellectual property rights, regardless of whether it concerns our company or third parties. Therefore, we seek to ensure that none of the products proposed to FITT constitute or involve any form of falsification of existing patents, models, designs, trademarks or other proprietary rights or pending approval.

# Code of conduct in relations with the public administration

We have relations with national, EU and international public institutions, with public officials or public service representatives based on respect for the principles of integrity, legality, transparency and impartiality. In this regard, it only pertains to contacts specifically and formally instructed by our company.

Promises of benefits, cash donations, granting of goods in nature, directly or indirectly, in favour of public officials and/or public service representatives from which an unfair or illegal advantage or interest may arise for our company are not permitted. In respect of company procedures, courtesy gifts of a modest value and hospitality costs are only permitted if, in view of the specific situation, they are such as not to lead to being considered aimed at obtaining favours or privileges, in contravention of the regulations in force.

In particular, in relations with the Public Administration, the following is prohibited:

- promising or granting payments in cash for purposes other than institutional, directly or through intermediaries;
- promising or granting favouritism in the hiring of staff or in the choice of suppliers of goods and services;
- producing false or altered documents and/or data or omitting information due also for the purpose of obtaining subsidies or other donations from the State, public bodies or the European Union;
- allocating contributions, subsidies and public funds for purposes other than those for which the funds were obtained.
- accessing public administration computer systems in an unauthorised way to obtain or edit information for the benefit of our company.

We reject any behaviour aimed at obtaining, from the State, the European Union or other public entity, any type of financial provision by means of altered or falsified declarations and/or documents or, more generically, through artifices or deception, including those made by means of an information or telematic system, intended to mislead the donating body. FITT does not award contributions, subsidies or funding obtained from the State or other public agencies or the European Union for unlawful purposes and other than those for which they were granted. FITT, if it considers it appropriate, can support public body programmes with the aim of achieving profit and benefits for the community as well as the activities of foundations and associations, always in compliance with the regulations in force and the principles of the Code of Ethics.

# Code of conduct in relations with the media

In line with the principles of transparency and completeness of information, FITT's external communications are provided in respect of the right to information. In respect of the principle of safeguarding the confidentiality of information, the recipients of the Code of Ethics who are responsible for relations with the media must not divulge false or biased news or comments, both concerning the business and the outcome of professional activities or relations with stakeholders in general.

In the conviction that the company's activities and results should be closely linked to responsible business conduct, external communications, including those aimed at the dissemination of FITT's brand and image, respect the ethical principles of this Code.







# Code of conduct in relations with the community and the region

## Code of conduct in respect of the local community

We are aware of the influence, even indirect, that our activities may have on the general well-being of the community and of the importance of the social acceptance of the communities in which we operate. For this reason, we want to invest sustainably, in respect of local communities, and support initiatives of cultural and social value in order to maintain a good reputation and a high level of social acceptance.

We are committed to paying attention to the life of the communities in which we operate and to listening to requests made by them. For this reason, we carry out information, listening and involvement initiatives. This applies in particular to the communities close to our plants, now and in the future.

In support of social and cultural initiatives and in general in sponsorship, we only take projects into consideration that are consistent with FITT's strategic objectives, with the principles of environmental and social responsibility and with the positions adopted by the Board of Directors.

In the case of donations and grants, FITT favours initiatives that offer a guarantee of quality, which are distinguished by the ethical message sent and that - in line with its mission - contribute to social development.

## Code of conduct in respect of political and trade union organisations

FITT does not provide any contributions of any kind to political parties, movements, committees, political and trade union organisations and candidates in elections and shall refrain from any undue pressure on public representatives able to provide benefits to the company.





rules for implementing  
the code of ethics

FITT's Code of Ethics is laid down in Legislative Decree 231/2001 and governs administrative responsibility in the case of crimes committed by persons acting in the interest or to the advantage of our company.

It is a binding instrument for anyone who works for and with FITT and to this end an implementation and monitoring system of the principles enshrined by it has been adopted. The Board of Directors is responsible for updating this Code, upon the proposal of the CEO, the Board of Statutory Auditors, or as a consequence of reports of any shortcomings received via the channels listed below.

The body appointed to oversee the implementation of the Code is the Supervisory Board, which coordinates with other functions and bodies responsible for the correct implementation of the Code of Ethics. The recipients of the Code are required to know it and to actively contribute to its implementation, suggesting areas of improvement to the intended functions and/or by reporting any breaches. The Code of Ethics is brought to the knowledge of the recipients by means of appropriate training and communication, approved by the Supervisory Board.

Any breaches identified must be properly communicated to the Supervisory Board via:

- email address: [odv@fitt.com](mailto:odv@fitt.com)
- BOX for reports

The Supervisory Board acts in accordance with company procedures, so as to avoid reporting any form of reprisals, discrimination or penalty, while ensuring the anonymity of the reporting and the confidentiality of the facts reported, without prejudice to any legal obligations and the protection of FITT's rights.

Managers are required to:

- give an example: in other words, show with their behaviour what it means to act with integrity;
- communicate with their staff to ensure that everyone understands the contents of the Code of Ethics and has the resources to implement it;
- support employees who in good faith, raise doubts and concerns;
- consistently apply the Code of Ethics.

The observance of the rules contained in the Code of Ethics is considered an essential part of the contractual obligations provided for.

A breach of the code of conduct and the principles contained in this Code of Ethics involves disciplinary sanctions based on the gravity of the act and the damage caused. The challenge procedures and application of sanctions, together with the description of the various types of sanctions applicable, are provided for in the general part of the Organisational Model of FITT S.p.A. pursuant to Legislative Decree No. 231/2001.

FITT undertakes disseminate the Code of Ethics as widely as possible, in particular when hiring new resources and via specific communication and training activities aimed at making the contents of the text more easily accessible and applicable to the everyday work of all recipients.

This Code of Ethics is adopted by a resolution of the Board of Directors of FITT S.p.A. on 30/03/2018.





useful questions  
for the application  
of the code





Before acting, you need to ask yourself: “Could my behaviour be...

- ... contrary to the Code of Ethics?
- ... considered dishonest, ethical or illegal?
- ... not in line with FITT’s policies, procedures and guidelines?
- ... damaging for FITT and its reputation if it becomes public?
- ... result in a loss of credibility for FITT by employees, customers, suppliers, shareholders or the community?

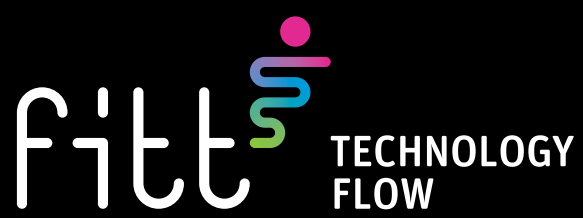
If the answer to any of the questions above is **YES** or **MAYBE**, we face a potential ethical problem and you should ask your manager, HR or the Supervisory Board for advice.



A woman with long dark hair, wearing a black sleeveless dress, is running through a dense shower of colorful confetti. The confetti consists of many small, round pieces in shades of blue, green, yellow, and pink. She is smiling and looking upwards, with her arms slightly outstretched. The background is a soft, out-of-focus mix of these colors, creating a festive and celebratory atmosphere.

welcome to the  
revolution





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