



**DISCIPLINARY SYSTEM**

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DATE	REVISION
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# **LP Drilling S.r.l.**


## **ADMINISTRATIVE RESPONSIBILITY MANAGEMENT SYSTEM MANUAL**

**Organisation,  
Management and Control Model  
pursuant to D.Lgs. 231/01**

	<b>Administrative Responsibility Management System (Organisation, Management and Control Model pursuant to Italian Legislative Decree D.Lgs. 231/01)</b>		Page <b>2 of 14</b>	
	<b>DISCIPLINARY SYSTEM</b>		Document update	
			<table border="1"> <thead> <tr> <th>DATE</th> <th>REVISION</th> </tr> </thead> <tbody> <tr> <td>31/12/2013</td> <td>00</td> </tr> </tbody> </table>	DATE
DATE	REVISION			
31/12/2013	00			

## Table of contents

<b>1. THE FUNCTION, AUTONOMY AND PRINCIPLES OF THE DISCIPLINARY SYSTEM .....</b>	<b>3</b>
<b>2. RECIPIENTS .....</b>	<b>4</b>
<b>3. RELEVANT CONDUCT.....</b>	<b>5</b>
<b>4. SANCTIONS.....</b>	<b>7</b>
4.1 <i>Employees (or equivalent).....</i>	<i>8</i>
4.2 <i>Executives.....</i>	<i>10</i>
4.3 <i>Members of the Board of Directors and the Board of Auditors .....</i>	<i>11</i>
4.4 <i>Consultants, collaborators, trainees and third parties .....</i>	<i>11</i>
4.5 <i>Members of the OdV.....</i>	<i>11</i>
<b>5. PROPORTIONALITY CRITERIA OF THE SANCTIONS .....</b>	<b>12</b>
<b>6. VERIFICATION OF THE SANCTIONS.....</b>	<b>12</b>
<b>7. VALIDITY.....</b>	<b>13</b>
<b>8. STANDARDS, DOCUMENTS AND LEGAL REFERENCES.....</b>	<b>13</b>

	<b>Administrative Responsibility Management System (Organisation, Management and Control Model pursuant to Italian Legislative Decree D.Lgs. 231/01)</b>		Page <b>3 of 14</b>
	<b>DISCIPLINARY SYSTEM</b>		Document update
	DATE 31/12/2013	REVISION 00	

## 1. THE FUNCTION, AUTONOMY AND PRINCIPLES OF THE DISCIPLINARY SYSTEM

This Disciplinary System is an Appendix of the Administrative Responsibility Management System drawn up in compliance with the GS 23101:2009 regulations “Requirements of an Administrative Responsibility Management System”, also consisting of the Organisation, Management and Control Model pursuant to Italian Legislative Decree DLgs. 231/01.

The disciplinary system is designed to prevent and punish, from a contractual perspective, any breaches of the provisions of the Organisation’s Administrative Responsibility Management System (SGRA), pursuant to Legislative Decree DLgs 231/2001 (Model).


The application of the sanctions is independent of the initiation and outcome of any criminal proceedings launched by Judicial Authorities when such censurable conduct constitutes one of the offences enumerated in Legislative Decree 231/2001.

This Disciplinary System is based on the following principles:

1. **Legality:** art. 6, paragraph 2, lett. e), of Legislative Decree no. 231/01 requires that the organisation and management model should introduce a disciplinary system with the power to punish breaches of the provisions laid down by the Model itself; it is therefore the duty of the Organisation:
  - i) to draw up a Code of Conduct;
  - ii) to draw up implementing procedures for the Model;
  - iii) to clearly specify the cases requiring disciplinary measures and the respective sanctions;
2. **Complementarity:** The disciplinary system provided for by the Organisation, Management and Control Model is complementary – and not alternative to – the disciplinary system laid down by the CCNL (collective national labour agreement) in force and applicable to the various categories of personnel working for the Organisation;
3. **Publicity:** the Organisation will do its utmost to spread knowledge of this document, first and foremost by publicising it in a place accessible to all workers (art. 7, paragraph 1, Workers’ Statute)<sup>1</sup>, as well as by delivering it by hand and via e-mail to each individual worker and making it available on the company Intranet;

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<sup>1</sup> 1 Art. 7. Disciplinary sanctions: 1. The disciplinary provisions regarding sanctions, the breaches for which each of these sanctions may be applied and the procedures for appealing against the same must be brought to the knowledge of

 <p><b>LP DRILLING</b> SAFETY - EFFICIENCY - COMMITMENT</p>	<b>Administrative Responsibility Management System</b> <b>(Organisation, Management and Control Model pursuant to Italian</b> <b>Legislative Decree D.Lgs. 231/01)</b>		Page <b>4 of 14</b>
	<b>DISCIPLINARY SYSTEM</b>		Document update
			DATE 31/12/2013

4. **Right to be heard:** the guarantee of the right to be heard is met, not only through the prior publicising of the Organisation Model, but also through the prior statement of objections written in a specific, immediate and unalterable manner (art. 7, paragraph 2, Workers' Statute.)<sup>2</sup>;
5. **Graduality:** the disciplinary sanctions have been drawn up and will be applied in accordance with the seriousness of the breach, taking into account all the circumstances, both objective and subjective, aggravating or otherwise, that have characterised the contested conduct, and the extent of the harm done to the corporate asset being protected;
6. **Typicality:** The contested conduct must be expressly provided for in the SGRA and the objection raised must be consistent with that on which the disciplinary sanction is based;
7. **Timeliness:** the disciplinary procedure and potential imposition of the sanction must take place within a certain and reasonable time limit from the initiation of the procedure itself (art. 7, paragraph 8, Workers' Statute.)<sup>3</sup>;
8. **Presumption of blame:** the breach of a rule of conduct, a prohibition or a procedure laid down by the Model, is presumed to be culpable and the seriousness of the same will be assessed, on a case by case basis, by the OdV (art. 6, paragraph 2, letter e, Legislative Decree 231/01);
9. **Efficacy and punishability of the attempted breach:** in order to adapt the disciplinary system for maximum efficiency, an assessment will be made of the punishability of conduct that merely puts the rules, prohibitions and procedures provided for in the Model at risk, or also only preliminary actions taken with the intention of breaching them (art. 6, paragraph 2, letter e), Legislative Decree 231/01).


## 2. RECIPIENTS

The parties subject to the application of this Disciplinary System are the Chairman and members of the Board of Directors, the Board of Auditors, executives, employees (managerial staff and office clerks), consultants, collaborators and third parties in general having contractual relationships with our Organisation.

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the workers, by affixing them in a place that is accessible to all concerned. They must be applied in accordance with the provisions laid down in labour agreements and contracts, when existing.

<sup>2</sup> Art. 7. Disciplinary sanctions: 2. The employer cannot adopt any kind of disciplinary measure against the worker without having previously stated the objection and heard the worker's defence in this regard.

	<b>Administrative Responsibility Management System (Organisation, Management and Control Model pursuant to Italian Legislative Decree D.Lgs. 231/01)</b>		Page <b>5 of 14</b>
	<b>DISCIPLINARY SYSTEM</b>		Document update
	DATE	REVISION	31/12/2013

The procedure for imposing the sanctions referred to in this disciplinary system takes into account any particular characteristics deriving from the legal status of the party against whom the action is being taken. In any case, the OdV (Supervisory Body) has to be involved in the disciplinary proceedings.

The OdV is responsible for investigating breaches of the Model and it is bound to report any proven violations to the Chairman of the Board of Directors in a timely manner. The conducting of the disciplinary proceedings and the imposition of sanctions are the responsibility of the Chairman of the Board of Directors.

A dedicated information channel will be set up in order to facilitate the flow of reports to the OdV on breaches of the provisions of this Model.

All recipients must be informed with regard to the existence and contents of this document. In particular, top management in association with the OdV will be responsible for ensuring the effective communication of the same.

### 3. RELEVANT CONDUCT

For the purposes of this Disciplinary System, and in observance of any provisions specified during collective bargaining (where applicable), all types of conduct, whether actions or omissions (also culpable), that could impair the efficiency of the system as a tool designed to prevent the risk of the perpetration of the offences enumerated in the Decree, constitute breaches of the Model.


In accordance with the constitutional principle of legality, as well as that of the proportionality of the sanction, taking into consideration all the elements and/or circumstances inherent to the same, it is deemed useful to define the possible breaches in order of increasing seriousness.

In particular, with regard to the activities related to the business of the Organisation, the following modes of conduct are considered relevant:

- 1) failure to comply with the Model, in the event of breaches within the sphere of the “sensitive” activities referred to in the “instrumental” areas identified in the “Process-Risk Map” per area of offence, and provided that one of the conditions contemplated in nos. 3 and 4 below does not arise;

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<sup>3</sup> Art. 7. Disciplinary sanctions: 8. The disciplinary sanctions shall have no effect if two years have elapsed before their application.


	<b>Administrative Responsibility Management System (Organisation, Management and Control Model pursuant to Italian Legislative Decree D.Lgs. 231/01)</b>		Page <b>6 of 14</b>
	<b>DISCIPLINARY SYSTEM</b>		Document update
	DATE	REVISION	31/12/2013 00

- 2) failure to comply with the Model, in the event of breaches within the sphere of the “sensitive” activities referred to in the “at major/direct risk” areas identified in the “Process-Risk Map” per area of offence, and provided that of the conditions contemplated in nos. 3 and 4 below does not arise;
- 3) failure to comply with the Model through a breach that constitutes only the fact (objective element) of one of the offences enumerated in the Decree;
- 4) failure to comply with the Model, if the breach in question aims at the perpetration of one of the offences enumerated in the Decree, or if, in any case, there is a risk of the responsibility of the Company being contested pursuant to the Decree.

It is appropriate, moreover, to define any possible breaches concerning the occupational health and safety sector, again in order of increasing seriousness:

- 5) failure to comply with the Model, if the breach in question creates a situation of real danger for the physical integrity of one or more persons, including the perpetrator of the breach, and provided that one of the conditions contemplated in nos. 6, 7 and 8 below does not arise;
- 6) failure to comply with the Model, if the breach in question harms the physical integrity of one or more persons, including the perpetrator of the breach, and provided that one of the conditions contemplated in nos. 7 and 8 below does not arise;
- 7) failure to comply with the Model, if the breach in question causes an injury classifiable as “serious” – pursuant to article 583, paragraph one of the Code of Criminal Procedure – to the physical integrity of one or more persons, including the perpetrator of the breach, and provided that one of the conditions contemplated in no. 8 below does not arise;
- 8) failure to comply with the Model, when the breach in question causes an injury, classifiable as “extremely serious” – pursuant to article 583, paragraph 2 of the Code of Criminal Procedure – to the physical integrity of one or more persons, or the death of the same, including the perpetrator of the breach.

It is compulsory for any party to report within 48 hours any breaches, anomalies or unusual behaviour in the performance of normal activities, particularly concerning any conduct which may be contrary to the Code of Ethics or the provisions of the Administrative Responsibility Management System in general, as well as any other offence and/or breach of other regulations, provisions, applicable rules, including any contingent situations.

	<b>Administrative Responsibility Management System (Organisation, Management and Control Model pursuant to Italian Legislative Decree D.Lgs. 231/01)</b>		Page <b>7 of 14</b>
	<b>DISCIPLINARY SYSTEM</b>		Document update
	DATE	REVISION	31/12/2013

The reporting procedure is hierarchical, to direct superiors unless they themselves are implicated in the reported breach. In this case, they shall report to the next superior in the hierarchy. The recipient of the report will assess its authenticity and inform Top Management and the OdV.

In the event of a conflict or if the Executive in question does not act promptly, employees and collaborators have, in any case, the faculty to request interpretative clarifications, or report breaches directly to the company's 231 officer and/or to the OdV.

For other stakeholders, the reference person for clarification and reporting is the company 231 officer or, in the event of conflict, the OdV directly.

Details for contacting the reference figures (addresses, e-mail and telephone) are transmitted and updated through corporate communications via the Intranet and website. Non-compliance with the requirement to report breaches constitutes a serious breach of the Disciplinary System.


Failure to respect the hierarchical reporting order will lead to the application of the Disciplinary System.

#### **4. SANCTIONS**

For the Model to be effectively operational, a disciplinary system must be adopted for the purpose of sanctioning breaches. Given the seriousness of the consequences for the Company of any illegal misconduct on the part of its employees, non-observance of the Model shall constitute a breach of the employee's duties of diligence and loyalty and, in the more serious cases, shall be considered detrimental to the relationship of trust established with the employee. The above-mentioned breaches shall, therefore, be subjected to the disciplinary sanctions described below, irrespective of the outcome of any criminal proceedings.

Any conduct adopted by employees in breach of the individual rules of conduct laid down in the Model will be defined as being disciplinary offences. The corporate disciplinary system consists of the applicable regulations of the civil code and of the agreements reached during the negotiations of the applicable National Collective Labour Contract.

The disciplinary system is not designed to replace the sanctions provided for by the respective national labour contracts but only to censure and punish breaches in corporate operating procedures and disloyal conduct towards the company by employees or personnel holding senior positions.

	<b>Administrative Responsibility Management System (Organisation, Management and Control Model pursuant to Italian Legislative Decree D.Lgs. 231/01)</b>		Page <b>8 of 14</b>
	<b>DISCIPLINARY SYSTEM</b>		Document update
	DATE 31/12/2013	REVISION 00	

This disciplinary system is brought to the knowledge of all employees ranking as managers and office clerks, e.g. by affixing a copy of it on the notice board or through various, specific corporate communication tools (e.g. intranet, e-mail, service communications etc...). All those wishing to receive a paper copy of this document may request it from the OdV.

So, any employees violating the Model are punishable through the sanctions provided for by the disciplinary provisions contained in the sources which at a collective level legally govern the labour relationship, in compliance with the principle of the graduality of the sanction and proportionality of the seriousness of the breach.

Any breaches committed by workers who are not formally classified as employees of the company could lead to the termination of their contract on the grounds of non-performance.

#### **4.1 Employees (or equivalent)**

The sanctions imposable on personnel belonging to the managerial and office clerk categories are the same as those provided for by art. 7 of Law 300/1970 and they are listed below.


Disciplinary dismissal cannot be appealed against in accordance with the procedures laid down by Law no. 604 of 15 July 1966, "Rules on individual dismissals".

The choice of the type of sanction to be imposed will be made following an assessment which will be carried out on the specific case in question, on the basis of the criteria described in paragraph 5 below.

The sanctions to be imposed in the case of a breach of the regulations of the Model are, in order of increasing seriousness:

- a) sanctions that preserve the work relationship:
  - i) Verbal warning– this sanction is applicable in the following cases:
    - i. breach of the internal procedures provided for in this Model, “for non-compliance with “service” provisions, or “for poor performance at work”;
    - ii. conduct characterised by “tolerance of service irregularities”, or “non-compliance with service duties or obligations, which did not jeopardise the service or the interests of the Organisation”.
  - ii) Written warning – this sanction is applicable in the following cases:
    - i. shortcomings punishable with a verbal warning but which, as a result of specific consequences or recurrences (repeated breach of the internal procedures provided for in the Model or repeated conduct in contrast with the provisions of the Model itself) are considered more seriously;



	<b>Administrative Responsibility Management System (Organisation, Management and Control Model pursuant to Italian Legislative Decree D.Lgs. 231/01)</b>		Page <b>9 of 14</b>
	<b>DISCIPLINARY SYSTEM</b>		Document update
	DATE	REVISION	31/12/2013

- ii. repeated failure to report, or tolerance on the part of designated supervisors, of minor irregularities committed by other members of personnel.

In the case of disciplinary measures more severe than a verbal warning, a written complaint must be notified to the worker, specifically indicating the breach committed. The measure cannot be issued until 5 days have elapsed since the lodging of the complaint, during which time the worker is entitled to present his/her justifications and may be assisted by the trade union representative. The disciplinary measure shall be motivated and communicated in writing. The worker is entitled to present his/her justifications, also in verbal form. The disciplinary provisions regarding sanctions, the breaches for which each of these sanctions may be applied and the procedures for appealing against the same must be brought to the knowledge of the workers through communication channels that are accessible to all concerned.

- iii) Suspension from work without pay for a period of not more than 10 days – this is applied in the following cases:

- i. non-compliance with the internal procedures provided for in the Model or negligence in connection with the Model's provisions;
- ii. failure to report, or tolerance of, serious irregularities committed by members of the personnel that could expose the company to an objective situation of danger or have negative repercussions upon it.


- b) termination of the work relationship:

- iv) dismissal for just cause – this is applied in the following cases:

- i. breach of one or more of the provisions of the Model due to conduct that could lead to the application against the company of the sanctions laid down by Legislative Decree 231/01;
- ii. serious non-performance by a hired worker of contractual obligations or reasons relating to production activities or to the organisation and regular running of work activities (pursuant to art. 3, Law 604/66);

- v) dismissal for just cause, pursuant to art. 2119 of the Italian Civil Code – this is applied in the case of:

- i. conduct in flagrant violation of the provisions of the Model, to such an extent as to demand the effective application by the Organisation of the measures laid down in Legislative Decree 231/2001, there being in the said conduct a

	<b>Administrative Responsibility Management System (Organisation, Management and Control Model pursuant to Italian Legislative Decree D.Lgs. 231/01)</b>		Page <b>10 of 14</b>
	<b>DISCIPLINARY SYSTEM</b>		Document update
	DATE	REVISION	31/12/2013


- “wilful breach of laws or regulations or official duties that could cause or that have already caused serious damage to the Company or to third parties”;
- ii. conduct aimed at the perpetration of an offence enumerated in Legislative Decree 231/2001.

#### 4.2 Executives

This Model is brought to the knowledge of the Organisation’s executives through specific communication initiatives. In the event of a breach, by any of the executives, of the internal procedures provided for in the Model or the adopting – during the execution of activities in the risk areas – of conduct in contrast with the requirements of the Model itself, the said management staff will be subjected to the application of the following sanctions:

- a) in the event of a minor breach of one or more of the behavioural or procedural regulations laid down in the Model, the executive will receive a written warning requiring him/her to comply with the Model, which constitutes a necessary condition for preserving the relationship of trust with the Organisation;
- b) in the event of a serious breach of one or more provisions of the Model such as to constitute serious non-performance, the executive will incur the sanction of dismissal with notice;
- c) when the breach of one or more provisions of the Model is so serious as to irremediably damage the relationship of trust, preventing even the temporary continuation of the work relationship, the executive will incur the sanction of dismissal without notice.

All those holding executive roles in the Organisation are bound by a relationship based on trust. For this reason, in the latter cases, the only applicable sanction is deemed to be the termination of the relationship. The imposition of the above-mentioned sanction is justifiable each time an Executive adopts a mode of conduct that violates the regulations contained in the Model (specified in par. 3 above) to such an extent as to irremediably damage the existing relationship of trust. The disciplinary measures examined in this paragraph are applied on the basis of criteria of proportionality of sanctions (described in par. 5) and observance of the procedure for verifying the sanctions (described in par. 6).

	<b>Administrative Responsibility Management System (Organisation, Management and Control Model pursuant to Italian Legislative Decree D.Lgs. 231/01)</b>		Page <b>11 of 14</b>
	<b>DISCIPLINARY SYSTEM</b>		Document update
	DATE	REVISION	31/12/2013

#### **4.3 Members of the Board of Directors and the Board of Auditors**

In the event of a breach of the Model by the Chairman of the Board of Directors, the Managing Director, or a member of the Board of Directors or the Board of Auditors, the OdV will inform the entire Board of Directors and the entire Board of Auditors without delay and in writing.

The corporate body to which the perpetrator of the breach belongs will take the most expedient and appropriate steps consistent with the seriousness of the breach and in accordance with the powers provided for under the law and/or the articles of association.

#### **4.4 Consultants, collaborators, trainees and third parties**

Any conduct adopted by consultants, collaborators, trainees and third parties having relationships with the Company, in contrast with the regulations laid down in the Model (referred to in par. 3 and put in place by the latter to safeguard against the risk of the perpetration of offences sanctioned by Legislative Decree 231/2001), could lead – as provided for by specific contractual clauses included in letters of appointment, agreements and contracts – to the immediate termination of the contractual relationship.


Such conduct will be evaluated in its entirety by the OdV which, after having consulted with the Manager of the Function/Department that requested the intervention of the professional figure in question and after warning the person involved, will report in writing and in a timely manner to the Chairman of the Board of Directors and, in cases considered more serious, to the Board of Auditors.

It is the responsibility of the OdV to identify and evaluate the appropriateness of including the above-mentioned clauses in the contracts governing relations with the said parties in the context of corporate activities potentially exposed to the perpetration of the offences enumerated in the aforementioned Decree.

The Organisation also reserves the faculty to claim for compensation, should such conduct lead to concrete damage in terms of material assets (in particular the application by a judge of the monetary or restrictive sanctions provided for by the Decree itself) or corporate image.

#### **4.5 Members of the OdV**

All the members of the OdV are jointly liable to the Organisation for damages resulting from non-compliance with the obligations of diligence in fulfilling their functions and the legal obligations laid down for carrying out the appointment. The liability for acts and omissions of the members of the OdV does not extend to those who, being blameless, have had their dissent recorded in the

	<b>Administrative Responsibility Management System (Organisation, Management and Control Model pursuant to Italian Legislative Decree D.Lgs. 231/01)</b>		Page <b>12 of 14</b>
	<b>DISCIPLINARY SYSTEM</b>		Document update
	DATE	REVISION	31/12/2013 00

minutes and given timely communication in any form to Top Management. Negligent conduct and/or incompetence on the part of members of the OdV which have given rise to failure to control the implementation of, compliance with and updating of the Model could bring about, as provided for in specific contractual clauses included in the letters of appointment, the immediate termination of the contractual relationship.

## 5. PROPORTIONALITY CRITERIA OF THE SANCTIONS

The seriousness of the breach will be evaluated by the OdV, with the aid of the RDD, on the basis of the following circumstances:

- concrete times and methods of implementation of the breach;
- existence and extent of an element of intentionality;
- extent of damage or danger as a result of the breach for the Organisation and for all the employees and stakeholders of the Organisation itself;
- predictability of the consequences;
- circumstances that gave rise to the breach.


Repetition of the breach is an aggravating factor and involves the application of a heavier sanction.

## 6. VERIFICATION OF THE SANCTIONS

With reference to the breach verification procedure, it is necessary to maintain a distinction – already clarified in the preliminary remarks – between personnel connected with the Organisation through subordinate employment relationships and other categories of collaborators.

For the former, the disciplinary proceeding cannot be other than that already governed by the “Workers’ Statute” (Law no. 300/1970) and by the CCNL (collective national labour agreement) in force. To this end, also for breaches of the regulations of the Model, the powers already conferred remain unaffected within the limits of the respective spheres of competence; however, in all cases the OdV must take part in the breach verification procedure and subsequent imposition of sanctions in the case of a breach of the regulations contained in the Model adopted.

So a disciplinary measure may not be filed nor a sanction imposed without prior information and consulting with the OdV, even if the proposal to initiate the disciplinary proceedings originally came from this Body itself.

	<b>Administrative Responsibility Management System (Organisation, Management and Control Model pursuant to Italian Legislative Decree D.Lgs. 231/01)</b>		Page <b>13 of 14</b>
	<b>DISCIPLINARY SYSTEM</b>		Document update
	DATE	REVISION	31/12/2013

For the other categories of subjects, connected to the Organisation by a relationship other than subordination, the disciplinary proceedings will be handled by the Chairman of the Board of Directors which will be notified by the OdV.

In the event of a breach by a director or auditor the body to which the perpetrator belongs will also be affected while, for violations committed by parties connected to the company through contracts, the right to terminate their contract will be exercised, on the basis of the terms laid down in the new contractual clauses in force.


## 7. VALIDITY

This Disciplinary System comes into effect on the date of adoption of the SGRA resolved by the Board of Directors, after consultation with the workers' representatives, and has an unlimited duration, without prejudice to any revisions that might emerge from the annual Management Review activities.

Any variation and/or addition must be approved by the Chairman of the Board of Directors.

## 8. STANDARDS, DOCUMENTS AND LEGAL REFERENCES

- Articles 2103, 2106, 2118, 2119 of the Italian Civil Code;
- Art. 7 of Law No. 300/1970 – Workers' Statute;
- Law No. 604/1966 on individual dismissals;
- Collective Labour Contracts applicable to the Workers of the Industry and/or Sector;
- *Legislative Decree No. 196 of 30 June 2003 – "Italian personal data protection code" (consolidated law on Privacy) and subsequent updates;*
- Legislative Decree No. 231 of 8 June 2001 - "Administrative responsibility of Organisations" and subsequent amendments and/or additions;
- Legislative Decree 81/08 – Occupational Health and Safety;
- Legislative Decree 152/06 – Consolidated Law on the Environment
- Italian Legislative Decree No. 231/07;
- Articles of Association and Internal Regulations;
- Confindustria Guidelines;
- INAIL (Italian National Institute for Insurance against Industrial Injuries) Guidelines;
- Quality, Safety & Environmental Management System;

 <p><b>LP DRILLING</b> SAFETY - EFFICIENCY - COMMITMENT</p>	<b>Administrative Responsibility Management System</b> <b>(Organisation, Management and Control Model pursuant to Italian</b> <b>Legislative Decree D.Lgs. 231/01)</b>		Page <b>14 of 14</b>	
	<b>DISCIPLINARY SYSTEM</b>		Document update	
			<table border="1"> <thead> <tr> <th>DATE</th> <th>REVISION</th> </tr> </thead> <tbody> <tr> <td>31/12/2013</td> <td>00</td> </tr> </tbody> </table>	DATE
DATE	REVISION			
31/12/2013	00			

- Administrative Responsibility Management System.