



FLOVEX S.R.L.

CODE OF ETHICS

**Pursuant to Art. 6 of Legislative
Decree N° 231/2001**

adopted by resolution of the Board on
4 March 2015

TABLE OF CONTENTS

| | |
|--|----|
| 1 INTRODUCTION | 4 |
| 1.1 OBJECTIVES OF THE CODE OF ETHICS | 4 |
| 1.2 RECIPIENTS | 4 |
| 1.3 MUTUALITY | 4 |
| 1.4 APPLICATION | 5 |
| 1.5 VALIDITY | 5 |
| 1.6 STANDARDS, DOCUMENTS AND REFERENCE LAWS | 5 |
| 2 GENERAL PRINCIPLES | 5 |
| 2.1 IMPARTIALITY | 5 |
| 2.2 HONESTY | 6 |
| 2.3 CORRECTNESS IN THE EVENT OF POTENTIAL CONFLICTS OF INTEREST | 6 |
| 2.4 CONFIDENTIALITY | 6 |
| 2.5 RELATIONS WITH SHAREHOLDERS | 6 |
| 2.6 VALUE OF HUMAN RESOURCES | 6 |
| 2.7 PROTECTION OF HEALTH AND THE ENVIRONMENT | 6 |
| 2.8 TRANSPARENCY AND COMPLETENESS OF INFORMATION | 7 |
| 2.9 DILIGENCE AND ACCURACY IN THE EXECUTION OF TASKS AND CONTRACTS | 7 |
| 2.10 QUALITY OF SERVICES | 7 |
| 2.11 FAIR COMPETITION | 7 |
| 2.12 RESPONSIBILITY TOWARDS THE COMMUNITY | 7 |
| 3 CRITERIA OF CONDUCT | 8 |
| 3.1 IN BUSINESS MANAGEMENT AND WITH OUR STAKEHOLDERS | 8 |
| 3.1.1 CORPORATE GOVERNANCE | 8 |
| 3.1.2 PARTNERS AND SHAREHOLDERS | 8 |
| 3.1.3 INFORMATION PROCESSING | 8 |
| 3.1.4 INTERNAL AND EXTERNAL COMMUNICATION | 9 |
| 3.1.5 GIFTS, PRESENTS AND BENEFITS | 9 |
| 3.2 WITH OUR EMPLOYEES AND COLLABORATORS | 9 |
| 3.2.1 STAFF RECRUITMENT | 9 |
| 3.2.2 ESTABLISHMENT OF EMPLOYMENT | 10 |
| 3.2.3 PERSONNEL MANAGEMENT | 10 |
| 3.2.4 WORK ORGANISATION MEASURES | 10 |
| 3.2.5 HEALTH AND SAFETY | 10 |
| 3.2.7 INTEGRITY AND PROTECTION OF THE INDIVIDUAL | 11 |
| 3.2.8 DUTIES OF WORKERS AND COLLABORATORS | 11 |
| 3.3 WITH OUR CUSTOMERS | 12 |
| 3.3.1 IMPARTIALITY | 12 |
| 3.3.2 TRANSPARENCY OF THE CONTRACTUAL RELATIONSHIP | 12 |
| 3.4 WITH OUR SUPPLIERS | 13 |

| | | |
|-----|--|----|
| 3.5 | WITH THE COMMUNITY..... | 13 |
| 4 | BODIES TO GUARANTEE AND CONTROL THE CODE OF ETHICS | 16 |
| 4.1 | SUPERVISORY AND CONTROL ORGANISM..... | 16 |
| 5 | SANCTIONING SYSTEM | 17 |
| 5.1 | COMMUNICATION AND TRAINING | 17 |
| 5.2 | VIOLATION OF THE CODE..... | 17 |
| 5.3 | MONITORING AND UPDATING OF THE CODE | 18 |

1 INTRODUCTION

1.1 Objectives of the Code of Ethics

This Code of Ethics (hereinafter the "Code") lays down the commitments and ethical responsibilities in the conduct of business and corporate activities undertaken by employees of the company Flovex SRL (from now "Flovex" or "Company"), whether they are Directors, Managers or employees in both internal and external relations and for the pursuit of the Company mission.

Flovex adopts this Code of Ethics as a **charter of rights and moral duties**, in a perspective of social responsibility.

1.2 Recipients

These are the subjects covered by the provisions of this Code of Ethics, identified as the Directors and members of corporate bodies, all employees of the Company and all those who, directly or indirectly, permanently or temporarily, establish relations with the Company and relationships to continue its mission throughout the territory in which Flovex works.

In particular:

- employees and collaborators of the Company, in implicit due compliance with the law and regulations, are required to adjust their actions and conduct to the principles, objectives and commitments provided by the Code of Ethics
- the members of the Board of Directors and the Board of Auditors follow the principles of this Code.

All recipients are required to know the contents of this Code, compliance with the rules of the Code must be considered an integral part of the contractual obligations of the employees and is in addition to the general duties of loyalty, correctness and execution of the labour contract in good faith; for recipients who are not employees, compliance with the Code is a condition for the continuation of the relationship with the Company.

1.3 Mutuality

This Code is based on an ideal of cooperation to the mutual benefit of the parties involved, while respecting the role of each party concerned.

In relations and external relationships, the Company requires third parties to adopt a similar ethical conduct towards it. The staff of Flovex must not enter into or maintain any relationship with third parties who show the intention not to observe such conduct.

1.4 Application

The Code applies to Flovex and is thus binding for the behaviour of all its employees, collaborators, directors and auditors. Flovex also requires all associate or affiliate companies and major suppliers to act in accordance with the general principles of this Code.

The members of the governing bodies, as well as demonstrating exemplary conduct in the performance of their appointed tasks, are bound to the widest dissemination of the Code and to provide every tool to ensure its full implementation.

1.5 Validity

This Code of Ethics shall enter into force after formal approval by the Board of Directors of Flovex. Any variation and/or supplement must be approved by the Board of Directors of Flovex.

1.6 Standards, documents and reference Laws

Articles 2103, 2106, 2118 and 2119 of the Civil Code

Art. 7 of the Law N° 300/1970 - Statute of Workers

Law N° 604/1966 on individual dismissals

Collective Bargaining Agreements

Legislative Decree N° 196 of 30 June 2003, - “Code regarding the protection of personal data” (“Consolidated Privacy Law”) and subsequent updates

Legislative Decree N° 231 of 8 June 2001, - “Administrative liability of Authorities” and subsequent amendments and/or additions

Legislative Decree N° 81/2008 - “Consolidated Law on the protection of health and safety in the workplace” and subsequent amendments and/or additions.

2 GENERAL PRINCIPLES

2.1 Impartiality

In decisions that influence relations with its stakeholders (the choice of Customers to be served, relations with shareholders, personnel management or work organisation, selection and management of supplier relationships, relations with the surrounding community and the institutions that represent it), Flovex avoids any discrimination based on age, sex, sexual orientation, state of health, race, nationality, political opinions or religious beliefs of its stakeholders.

2.2 Honesty

As part of their professional activity the recipients of the Flovex Code of Ethics must diligently comply with applicable laws, the Code itself and internal regulations. In no case may the pursuit of the interest of Flovex justify dishonest conduct.

2.3 Correctness in the event of potential conflicts of interest

In conducting any activity situations must always be avoided where individuals involved in transactions are, or may only appear to be, in conflict of interest. This refers to both the case where an employee or collaborator pursues an interest different from the company mission or takes advantage "personally" of business opportunities of the company, and the case in which the representatives of customers or suppliers, or public institutions act in contrast to the fiduciary duties associated with their position in relations with Flovex.

2.4 Confidentiality

Flovex ensures the confidentiality of information in its possession and refrains from seeking confidential data, except in cases involving express and informed authorization and compliance with existing laws. In addition, the recipients of this Code are required not to use confidential information for purposes not related to the exercise of their business.

2.5 Relations with shareholders

Shareholders, even when only potential, are not only a source of funds, but persons with opinions and moral preferences of various kinds. To be guided in investment decisions and company resolutions, they therefore require all the relevant information available.

Flovex creates the conditions for the participation of shareholders in decisions within their competence to be widespread and informed, it promotes equal access to information and also protects the interest of Flovex and of all shareholders from actions undertaken by coalitions of shareholders and designed to give precedence to their special interests.

2.6 Value of human resources

Employees and collaborators of Flovex are a key factor in its success. For this reason, Flovex protects and promotes the value of human resources in order to improve and increase the wealth and competitiveness of the skills possessed by each of them.

2.7 Protection of health and the environment

The Company guarantees the physical and moral integrity of its employees and collaborators, as well as working conditions that respect individual dignity and safe and healthy work environments.

The environment is a primary asset that the Company is committed to safeguarding and to this end it plans its activities by seeking a balance between economic initiatives and indispensable environmental needs, taking into account the development of scientific research and best experiences in the field.

To confirm this Flovex has adopted a Work Safety Management System and a set of procedures designed to prevent risks to the health and safety of workers.

All company procedures and all acts made by the recipients of this Code must comply with the above values.

2.8 Transparency and completeness of information

The recipients of this Code are required to provide complete, transparent, understandable and accurate information, so that, in establishing their relations with the company, third parties will be able to make independent and informed decisions regarding the interests involved, the alternatives and significant consequences. In particular, in the formulation of any contracts, Flovex takes care to specify to the contractor the conduct to be adopted in all foreseeable circumstances, in a clear and understandable manner.

2.9 Diligence and accuracy in the execution of tasks and contracts

Contracts and work assignments must be carried out as knowingly determined by the parties. Flovex undertakes not to exploit conditions of ignorance or incapacity of its counterparties. In existing relationships, anyone acting in the name and on behalf of Flovex must avoid trying to take advantage of loopholes or unexpected events to renegotiate contracts with the sole purpose of exploiting a position of dependency or weakness in which the party happens to be.

2.10 Quality of services

Flovex directs its activities to the satisfaction and protection of its Customers by listening to requests that may lead to an improvement in the quality of services. For this reason, Flovex focuses its development and marketing activities on high standards of quality in its services.

2.11 Fair competition

Flovex respects the principles of free and fair competition and refrains from engaging in any behaviour contrary to antitrust laws.

2.12 Responsibility towards the community

Flovex is aware of the influence, even indirectly, that corporate activities may have on the conditions, economic and social development and the general welfare of the community, as well

as the importance of social acceptance of the community in which it operates. For this reason, Flovex intends to conduct its investments in an environmentally sustainable manner, respecting local and national communities, and supporting initiatives of cultural and social value in order to achieve an improvement in its reputation and social acceptance.

3 CRITERIA OF CONDUCT

3.1 In business management and with our stakeholders

3.1.1. Corporate Governance

The Corporate Governance system is rather simple and based on a traditional system of administration. Accounting control is exercised by the Board of Auditors.

3.1.2 Partners and shareholders

The Company must maintain a profile of maximum correctness, transparency, impartiality and fairness in its relations with its Partners and shareholders.

The Board of Directors (BoD) of Flovex and identified Auditors ensure that all staff involved in the preparation of financial statements of the Company:

- carry out their tasks and carefully control processed data, collaborate with all the functions at the highest degree, report any potential situations of conflicts of interest and provide clear and complete information;
- do not commit any action that impedes or obstructs the activities of control and/or revision that is the business of shareholders, other corporate bodies, accounting firms or public regulatory authorities;
- prevent any component member from acting in such a way as to influence the behaviour of the meeting in order to gain personal benefit;
- ensure that no employee spreads false information concerning colleagues, in order to significantly alter the perception of the financial stability of Flovex;
- ensure that all information provided to the authorities of public supervision is truthful, transparent and comprehensive;
- prevent administrators, or their representatives, from acquiring or subscribing to shares of the Company and/or its subsidiaries which cause a lesion of the share capital or reserves that cannot be distributed by law.

3.1.3 Information processing

Flovex undertakes to process information in full compliance with the confidentiality and privacy of those concerned. To this end specific policies and procedures are applied and constantly updated for the protection of information and personal data, in particular Flovex:

- defines an organisation for the processing of information that ensures the correct separation of roles and responsibilities;
- takes appropriate counter-measures at each stage of processing;
- requires third parties involved in the processing of information to sign confidentiality agreements;
- ensures the proper processing of personal data in compliance with the requirements of the Privacy Code.

3.1.4 Internal and external communication

The communication of Flovex towards all its stakeholders, accomplished through all available channels, is based on respect of the right to information; under no circumstances is it permitted to disclose false or biased news or comments. Every activity of internal and external communication complies with the laws, rules and practices of professional conduct, and is carried out in a clear, transparent and timely manner.

3.1.5 Gifts, presents and benefits

It is not allowed to provide any form of gift that could even be interpreted as exceeding normal business practices or courtesy, or in any event aimed at obtaining favourable treatment in conducting any activity related to the Company. In particular, it is prohibited to make any form of gift to Italian and foreign public officials, or their relatives, to customers, Flovex consultants, mayors or their family members, which might influence their independent judgment or induce them to ensure any advantage, except for gifts or benefits of modest value.

It is also forbidden to offer or accept any object, service or performance of value to obtain a more favourable treatment in relation to any dealings with Public Administration.

These rules of conduct do not admit exceptions, even in those countries where offering gifts of value to commercial partners is customary.

3.2 With our employees and collaborators

3.2.1 Staff recruitment

The assessment of personnel to be hired is performed based on matching profiles of candidates to those expected and to business needs, in respect of equal opportunities for all stakeholders. The information requested is strictly linked to the verification of the aspects of the professional and psychological aptitude profile, in respect of the private sphere and opinions of the candidate.

The human resources managers, within the limits of the available information, take appropriate measures to avoid favouritism, nepotism or cronyism in selection and hiring stages.

3.2.2 Establishment of employment

Staff is hired with a regular employment agreement, without tolerating any form of illegal labour, including the recruitment of third-country nationals without a residence permit, or an expired, revoked or cancelled residence permit. On the establishment of an employment agreement, selected staff receive accurate information regarding:

- characteristics of the function and duties to be performed;
- regulations and salary details, as governed by the collective bargaining agreement;
- standards and procedures to be adopted in order to avoid possible health risks associated with the job.

This information is presented so that the assignment is fully understood.

3.2.3 Personnel management

Flovex avoids any form of discrimination against its employees and collaborators. Access to roles and positions is determined in consideration of skills and capabilities. Furthermore, consistent with overall work efficiency, favourable treatment is applied to flexibility in work organisation which facilitates the management of maternity.

Flovex makes information and training tools available to all employees and collaborators, with the aim of enhancing specific skills and preserving the value of professional staff.

3.2.4 Work organisation measures

In the case of work reorganisation the value of human resources is safeguarded by providing, where necessary, professional training and/or retraining. Flovex therefore adopts the following criteria:

- the burdens of work reorganisation must be distributed as evenly as possible between all employees and collaborators, in line with the effective and efficient performance of the business;
- in the case of new or unexpected events, which must always be explained, Flovex staff can be assigned to tasks other than those previously carried out, taking care to safeguard professional skills.

3.2.5 Health and safety

Flovex undertakes to:

- spread and consolidate a culture of safety by developing risk awareness and promoting responsible behaviour by all recipients of this Code
- preserve, mainly through preventive action, the health and safety of workers, by developing appropriate methods of measurement for their systematic evaluation
- ensure the continuous improvement of performance in terms of safety and health of workers, by developing appropriate methods of measurement for their systematic evaluation

- eliminate risks and, where this is not possible, minimize them in relation to knowledge based on technological progress
- reduce risks at source
- provide adequate instructions to all workers.

3.2.7 Integrity and protection of the individual

Flovex undertakes to safeguard the moral integrity of workers, ensuring the right to working conditions which respect the dignity of the individual. Flovex, in fact, protects workers from acts of psychological violence and opposes any attitudes or discriminatory behaviour or prejudice to the individual, their beliefs and preferences. Sexual harassment is not tolerated and behaviour or comments should be avoided that might offend the sensibilities of the individual. Flovex employees or collaborators who believe they have been subjected to harassment or have been discriminated against on the grounds of age, gender, sexuality, race, state of health, nationality, political opinions or religious beliefs can, through appropriate channels, report this to the company which will assess the effective violation of the Code.

3.2.8 Duties of workers and collaborators

Employees or collaborators shall act loyally in order to respect the obligations stipulated in the employment contract and the provisions of the Code, ensuring the required performance; and are required to report, through the appropriate channels, any violation of rules of conduct established by internal procedures.

Workers must know and implement the provisions of the corporate policies on information security to ensure its integrity, confidentiality and availability. They are required to draft documents using clear, objective and comprehensive language, allowing any checks by colleagues, or persons authorized to make a request.

All Flovex employees and collaborators are required to avoid situations where they may experience conflicts of interest and to refrain from taking personal advantage of business opportunities of which they have become aware during the course of their duties.

By way of example, but not limited to the following, the situations listed below can lead to a conflict of interests:

- performing a top role also through family members;
- liaising with suppliers and performing work, even by a family member, with suppliers;
- accepting money or favours from people or companies that have or intend to have business relations with Flovex.

In the event that even the appearance of a conflict of interest occurs, the employee or collaborator is required to give notice to their supervisor, who, in the manner prescribed, shall notify the Supervisory Organism which evaluates its effective existence, case by case. The

collaborator is also required to provide information about activities conducted outside of working hours, in cases where they may appear to conflict with the interests of Flovex.

Each employee or collaborator is required to work diligently to protect corporate assets by acting responsibly and in line with the operating procedures in force, to regulate their use, accurately documenting their application. In particular, each worker must:

- use the assets entrusted to them with care and prudence;
- avoid any improper use of company assets that may cause damage and reduce efficiency or otherwise be contrary to the interests of the company.

Each worker is responsible for protecting the resources entrusted to them and has a duty to report promptly to the units in charge any threats or damaging events for the company. Flovex reserves the right to prevent the improper use of its assets and infrastructures through the use of accounting and reporting, financial control, analysis and risk prevention systems, while respecting the provisions of the laws in force.

As for computer applications, each collaborator is required to:

- comply scrupulously with the provisions of the corporate security policies, in order not to compromise the operation and protection of computer systems;
- not send threatening or insulting e-mail messages, use low-level language, make inappropriate comments that could offend individuals and/or damage the corporate image;
- not surf the internet with indecent and offensive content, unless explicitly required by business needs (for example, in order to protect the Company from third parties and users who commit offenses through the means provided for lawful purposes by the Company itself).

3.3 With our Customers

3.3.1 Impartiality

Flovex undertakes not to arbitrarily discriminate among its Customers.

3.3.2 Transparency of the contractual relationship

In managing relationships with Customers Flovex is inspired by criteria of transparency, loyalty and correctness. Flovex requires that the relationship with Customers is always marked by the utmost respect for decorum and human dignity without discrimination.

For this purpose communications to Customers are:

- clear and simple, drafted in a language as close as possible to that normally used by the counterparts;

- in compliance with current regulations, without resorting to elusive or in any way improper practices;
- complete, so as not to overlook any elements relevant to the customer's decision.

3.4 With our suppliers

3.4.1 Criteria of selection and relations with suppliers

Supplier selection and the formulation of conditions of purchase of goods and services for the Company is guided by values and parameters of competition, objectivity, correctness, impartiality, fairness, price, quality of goods and service provided, guarantees of assistance and, finally, an accurate and precise evaluation of the offer. The signing of a contract with a supplier must also avoid, where possible, the acceptance of contractual obligations that involve forms of dependence of Flovex on the same supplier.

Flovex sets its purchasing processes seeking the maximum competitive advantage for the company, and loyalty and impartiality with respect to its selected suppliers, seeking cooperation regarding the satisfaction of Flovex Customers in terms of quality and level of service offered.

In no case will undue pressure be accepted from the supplier, such as to undermine the confidence that the market places in Flovex regarding the transparency and rigour in the application of the Law and company procedures.

In addition, under comparable economic conditions, Flovex favours suppliers who show themselves more sensitive to ethical issues; therefore, in the process of selection of suppliers, as well as quality, innovation, costs and services offered, the values outlined in the Code are also taken into account.

In all cases, assuming that the supplier, in carrying out its activities for Flovex, adopts behaviour not in line with the general principles of this code, Flovex is entitled to take appropriate measures even as far as to preclude any further collaboration.

Similarly Flovex is committed to making sure that in relations with other Companies cash benefits or other benefits are not provided to directors, general managers, managers responsible for preparing corporate accounting documents, auditors, liquidators or their subordinates that are not adequately justified in the context of the contractual relationship established with them, depending on the type of task to be performed, the fee received, the characteristics of the partnership relation and current practices.

3.5 With the community

3.5.1 Relations with Public Administration

In relations with Public Administration no form of illegal conduct is allowed, such as, by way of example only, attempted bribery, extortion, misappropriation of funds, fraud against the State, a public body or for the obtaining of public administration grants.

Acts of corruption are considered to include illicit payments/donations of utilities made directly by the Company or its employees, and illicit payments/donations of utilities made through persons acting on behalf of the Company, both in Italy and abroad.

In relations with Public Administration (operations, negotiations, contracting, execution of performance, etc.) maximum clarity, transparency and verifiability of the relevant information must be ensured.

When any negotiation, request or relationship with Public Administration is under way, company personnel should not attempt to improperly influence the decisions of the counterparty, including those of officials acting or making decisions on behalf of Public Administration.

If the Company uses a consultant or "third party" to represent it in relations with Public Administration, provisions are to be made that the same guidelines also apply to the consultant and his staff or the "third party" as are applied to the employees of the authority. In addition, the Company shall not be represented in dealings with the Public Administration, by an adviser or by a "third party" when conflicts of interest can be created.

When taking part in tenders for services and/or products:

- the activities of the personnel of the Company must not in any way lead to the alteration of the impartiality of Public Administration, such as through an artificial reduction in the number of participants in the tender, the offer of employment and/or business opportunities to members of the Public Administration or the request for confidential information (such as the award criteria);
- Flovex personnel responsible for contact with Public Administration must guarantee the truthfulness and accuracy of the data and information contained in the documents submitted for participation in the tender.

The assumption of commitments and the management of relations with Public Administration are reserved exclusively to the company departments concerned and personnel authorized to do so.

The following must be considered prohibited:

- offering money or any other benefits to directors, officers or employees of Public Administration or their relatives, unless in cases of commercial courtesy of modest value. It is however possible to bestow gifts of a purely symbolic or personalized nature, nevertheless of limited value and such as not to compromise the integrity or reputation of either party, nor to be interpreted by an impartial observer as aimed at gaining undue advantages and/or improperly;

- offering or accepting the request of a public official with respect to any object, service, benefit or favour which are unlawful or in any event extraneous to the legal relationship existing with regard to the person concerned on account of the activity performed on behalf of the Company;
- proposing employment and/or business opportunities which could benefit (directly or indirectly) civil servants or their relatives in a personal manner.

Illegal behaviour also extends to those who, by concluding agreements with consultants, brokers, sponsors, agents or other intermediaries, make payments to one or more persons of the Public Administration.

If the Company has obtained from the State or other public body, or from the European Union grants, subsidies or funding for specific activities in the public interest, it is forbidden for collaborators to allocate such funds for purposes other than those for which they were obtained. Each employee or collaborator who is in a position to generate, even only potentially, a conflict of interest with regard to a public official or a civil servant of the Public Administration must immediately notify their superior.

A Public Official or a civil servant can be in conflict of interest when the particular personal position of the employee or the collaborator is, even potentially, capable of affecting their impartiality or at least their independent judgment (for example in the case of a family relationship with the public official or in the case of relations of a private nature between the parties).

The Company may not be represented in dealings with the Public Administration, by an adviser or by a person who may create a conflict of interests.

3.5.2 Economic relations with political parties, trade unions and associations

Flovex does not finance political parties in Italy or abroad, their representatives or candidates, nor does it sponsor conferences or festivals whose exclusive purpose is political propaganda. It refrains from making any direct or indirect pressure on political representatives. Flovex does not make contributions to organisations with which there may be a conflict of interest; but it can cooperate, even financially, with such organisations for specific projects based on the following criteria:

- goals related to the mission of Flovex
- clear and documented destination of resources
- express permission from the departments responsible for managing such relations within Flovex.

3.5.3 Media organisation and Mass Media

Any communication by the Company to the community must be truthful, clear, transparent, non-instrumental and in conformity with the policies and programmes of the company.

In all cases communication is subject to the constraints of respect for the protection of personal data and can only be disclosed by expressly authorized figures.

3.5.4 *Relationship with the Environment*

Flovex considers the Environment a conditioning factor strategic in performing and developing corporate activities and directs its business towards a model of development compatible with environmental legislation on waste, disposal and protection of atmospheric emissions.

Flovex therefore undertakes to:

- encourage staff awareness on environmental issues
- adopt appropriate measures to limit and, where possible, eliminate the negative impact of economic activity on the environment;
- programme accurate and continuous monitoring of scientific and regulatory developments relating to the environment;
- optimize the use of natural resources through the rational and efficient use of energy resources and materials, through the monitoring of consumption and the reuse and recycling of waste;
- train and authorise staff to identify and reduce the environmental impact of business activities, promoting at all levels a widespread sense of responsibility towards the environment.

3.5.5 *Donations and sponsorships*

Flovex is committed to the community through solidarity initiatives and investments of varying social impact. It also takes part in several commercial initiatives through sponsoring and promotional activities related to social, environmental, sports, entertainment and art themes. Such initiatives, both eventually at local or national level, are intended only for events that offer a guarantee of quality and for which Flovex can collaborate in their design, in order to ensure originality and effectiveness. In any case, when selecting the proposals to support, Flovex pays close attention to any possible conflict of interest at personal or corporate level.

4 BODIES TO GUARANTEE AND CONTROL THE CODE OF ETHICS

4.1 Supervisory and control organism

The Board of Directors, to perform the functions and tasks defined and assigned by the Code, uses a task force called "the Supervisory and control organism".

The control organism performs all the support and investigatory activities necessary to accomplish its work. In particular, the Supervisory and control organism:

- monitors compliance with the requirements of this Code;

- coordinates the review and amendment of the ethical standards and company procedures for implementation to adjust and bring them into compliance with current Laws;
- provides binding opinions in the interpretation, evaluation and implementation of the Code of Ethics, in order to make this the reference tool for the correct conduct to be adopted within the Organisation;
- activates business functions, as a result of violation of the Code of Ethics and abnormal conduct, or in any case conduct of a significant nature, through alerts and reports to define the necessary corrective measures;
- guarantees the protection of the subjects reported (including the confidentiality of the reporting party's identity);
- periodically reports to the Board of Directors on the status of implementation of the Code of Ethics, on initiatives and the effectiveness of corrective measures taken;
- receives reports of any violations made within the company and accordingly informs the Board of Directors and Board of Auditors;
- promotes the sanctioning procedures following the finding of noncompliance with the requirements of this Code of Ethics.

5 SANCTIONING SYSTEM

5.1 Communication and training

The Code is brought to the attention of the recipients within and outside the company through specific means of communication. In order to ensure the correct understanding of the Code by all employees and collaborators of Flovex, the functions responsible for human resources prepare and implement a plan of information aimed at promoting awareness of the ethical principles and standards, ensuring that these principles and rules are part of the guidelines in the design of relevant training.

5.2 Violation of the Code

Compliance with the provisions of the Code of Ethics is an integral and essential part of contractual obligations concerning employees of the Company, its collaborators and all those who in any way cooperate in the pursuit of the goals of the Company.

The violation of the provisions contained in the Code of Ethics will constitute, therefore, a breach of the obligations arising from the relations of any kind with the Company and, thus, a disciplinary offense, with all legal consequences, including with regard to the continuation of the employment relationship.

In the face of violations of what is described in this Code by employees and collaborators, the Company will adopt with regard to the person responsible the penalties provided for by the Collective Bargaining Agreement, with variable measures, depending on the seriousness of the case, from warnings to termination.

The Supervisory Organism shall undertake to have disciplinary sanctions imposed by the competent organism, with coherence, impartiality and uniformity, while still complying with the limits imposed by law and by collective bargaining in the sector.

The Supervisory Organism shall promptly inform the Board of Directors of the sanctions order imposed by the Company for violations of the Code of Ethics.

Likewise the Company does not intend to start or continue relationships with individuals who do not intend to comply with its principles of ethics and conduct. In the face of any violations of the standards of the Code, the Company therefore reserves any subsequent action, both within the scope of the contract, or where not provided for by the contract.

Any violations of the Code of Ethics can be reported to the Supervisory Organism which will evaluate the effective violation and where necessary will take steps to initiate subsequent disciplinary proceedings.

5.3 Monitoring and updating of the Code

The check on the application and compliance with the code is carried out periodically by the Supervisory Organism, which promotes the continuous improvement of corporate ethics, ensures the development of ethics training and analyses the proposals for revising company procedures with significant impact on ethics.