

Aquafil S.p.A.

Via Linfano 9 38062 – Arco (Trento)

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Organizational, Management and Control Model pursuant to Legislative Decree 231/2001

Annex 3

Code of Ethics

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INTRODUCTION AND RECIPIENTS

This Code of Ethics (hereinafter also referred to as the “**Code**”) has been defined and approved by the Directors of the Companies of the Aquafil Group (hereinafter also referred to as “**Aquafil**” or “the **Group**”) with the purpose of providing a guideline to the management, employees and, in general, to all those working on behalf of the Group or on its mandate. Top Managers, Statutory Auditors, Employees, Business Partners and all those working in the name and/or on behalf of any of the Group Companies — *whatever the relationship binding them to the same, including of a temporary nature (advisors, agents, attorneys-in-fact, also referred to collectively as “**Collaborators**”)* — hereinafter collectively referred to as the “**Recipients**”, are required to comply with the provisions set out in this Code. Each Recipient shall be provided with a copy of the Code and will be required to apply it in all circumstances. Each Recipient shall also be required to formally accept the Group’s standards of conduct by signing the “Statement of acceptance” attached hereto. Each Recipient is therefore required, when performing his or her functions, including when representing the Group Companies before third parties, to comply with the standards contained in this Code. The Group companies shall refrain from initiating or maintaining relationships with outside parties who do not intend to observe the principles contained in this document. Any doubts arising on the application of this Code should be timely reported and discussed with the Supervisory Board (hereinafter also referred to as the “**SB**”) within the Group Companies which have introduced it pursuant to the Legislative Decree No. 231/01. The Code of Ethics should be adopted by each Group Company (if necessary, by integrating it with specific clauses for the different Countries and/or modifying it in compliance with the locally applicable laws).

DEFINITIONS

Pursuant to this Code, “**Group**” means the Aquafil Group (including all the Italian and foreign companies); “**Employee**” refers to all the workers, employees, managers of the companies; “**Collaborator**” refers to all professionals working for and/or on behalf of the company; “**Supervisory Board**” refers to the Supervisory Board in charge for the surveillance on the functioning of the Organizational and Management Model pursuant to Legislative Decree No. 231, set up within the Group Companies in compliance with said regulation.

The Board of Directors of the Group Companies shall acknowledge the standards contained in this Code and adopt them at local level, updating them, whenever necessary, in order to bring it in line with any changes in law, business practices and the ethical standards of the communities in which the Company operates. The Board of Directors is also responsible for supervising the correct interpretation and the regular application of the Code.

The principles and the provisions of the Code are exemplary explanations of the general obligations of diligence, fairness and loyalty which ought to inform and inspire the actions and decisions of all Recipients, especially those vested with oversight and coordination responsibilities, who are called upon to lead by the example the conduct of all Employees and raise the awareness of those under their supervision with regard

to matters addressed in the Code, with a view to ensuring compliance with the required standards of conduct.

VIOLATIONS OF THE CODE OF ETHICS AND REPORTS OF MISCONDUCT

All Recipients are contractually bound to strictly comply with the provisions of the Code ¹, it being understood that breaches of the Code could constitute, depending on the circumstances, behavior warranting the imposition of disciplinary measures (as contemplated under applicable regulations) and/or a breach of contract, and may give rise to liability for compensatory damages covering the harm occasioned to the Company as a result of the Recipient's non-compliance.

The Group Companies, through the bodies and functions specifically appointed to this role, shall assess the infringements and impose, with consistency, impartiality and uniformity, sanctions that are proportionate to the violations and in compliance with the existing provisions on employment relations.

Non-compliance with the provisions of this Code could entail, in particularly serious cases, the termination of the employment contract, without prejudice to the employer's other rights and remedies under law, especially the right to claim damages in respect of the harm sustained by the Company as a result of the aforesaid non-compliance.

Should an employee deem that:

- another employee has violated or intends to violate the Code or a rule;
 - during the course of work, he/she is requested to violate the Code or a rule,
- the said employee should immediately inform the Human Resources Manager and/or the Chief Executive Officer of the Company and, in any case, the Supervisory Board. Employees tasked with supervisory and coordination responsibilities who, although being aware that an employee subject to their responsibility could violate the Code, do not undertake the appropriate measures, shall be considered as responsible as the employee who violates the Code.

The Group Companies ensure that the employee who reports any violation remains anonymous to the extent to which this is compatible with the investigation duties and, where necessary, with reporting the facts to the Public Authorities. Any Recipient is barred from taking action against an employee who has reported in good faith a violation — even if only suspected — of the Code. Anyone who infringes this prohibition will be subject to disciplinary measures as provided for by the applicable laws.

COMPLIANCE WITH ALL LAWS

The Group Companies recognize as a core principle the observance of the laws in force in the Countries in which they operate. In performing their activities, the Recipients have to know and respect the rules of the legal system (national,

¹ For Italian Group companies, see Article 2104 of the Italian Civil Code: Diligence required to Employees — Employees must exercise the diligence required by the nature of their tasks, taking due account of the interest of the corporation, as well as the superior interest of national production. Employees must furthermore comply with provisions regarding the performance and regulation of work activities, as imparted by the employer and the latter's collaborators to whom the employee in question is answerable.

supranational or foreign) in which they operate. Any regulatory violation may be reported to the competent Authorities.

Anti-money laundering

The Group carries out its activity in full compliance with the existing anti money-laundering laws and with the provisions issued by the competent Authorities.

To this end, the Group shall avoid any suspect operation in terms of fairness and transparency and check, on a preventive basis, the available information related to clients, suppliers, outside collaborators, and agents in order to verify the respectability and lawfulness of their activities. Moreover, all Recipients shall act in order to avoid involvements in operations even potentially capable to favor the money-laundering deriving from illicit or criminal activities. Each Recipient who carries out, on behalf of the Company, operations and/or transactions related to amounts of money, goods or other utilities of economic value should act upon authorization and provide upon request every valid evidence to be verified at any time. Collections and payments should be peremptorily effected by means of bank remittances or cheques issued with the clause of non-transferability. In addition, all Recipients are required to:

- I. not accept goods and/or services and/or other benefits for which there is no properly authorized order/contract;
- II. not make cash payments of more than €1,000 (this also includes payments made in installments of lower amount, but concerning the same supply and overall exceeding €1,000).

Import / Export Laws and Sanctions

The Group shall respect the rules governing the Import/Export activity, including the temporary restrictions imposed from time to time by the Italian State, the foreign Countries where the Group Companies' registered offices are located and the supranational organizations which the Italian State belongs to (EU, NATO, UNO, etc.).

Privacy

The Group protects the privacy and confidentiality of the information and data related to employees, outside collaborators, clients, suppliers, business partners, collected for the purpose of or as part of work activities. Each Recipient is required to comply with this principle and with the existing rules. The privacy of employees and collaborators is protected through standards, which specify the information required by the Enterprise to the collaborators and the related terms of data handling and storing capable to guarantee the utmost transparency to the interested subjects and the unavailability to third parties, except for justified and exclusively work-related reasons. Any investigation on ideas, preferences, personal tastes and, in general, the private life of the collaborators is forbidden. It is, moreover, forbidden to disclose/disseminate personal data without the prior consent of the interested subject, except for the cases provided for by the law.

Anti-trust Regulations

The Group and all Recipients shall observe the anti-trust regulations (prohibiting conducts aimed at limiting competition) and avoid any unfair action towards business counterparts (i.e., sabotage, falsification of technical, commercial and accounting documentation and, in general, any kind of fraud). Business initiatives, such as

exclusive agreements, bound purchases, underselling, etc., shall be authorized by the CEO.

Protection of industry and trade

The Group shall in no case pursue aggressive or misleading commercial policies aimed at influencing the consumer that purchases its products and by means of any form of physical-psychological threats or through a false communication on the product such to mislead the client.

The Group's conduct towards its competitors is inspired by principles of loyalty and fairness and, consequently, the Group stigmatizes and disapproves any conduct which may hinder or disturb business or trade, or which could be linked to the perpetration of offences against industry and trade, should the companies have complied with the principles envisaged by the Group.

Therefore, all Recipients are barred from:

- I. using violence against things or use fraudulent means to prevent the trade or business of others;
- II. in the exercise of an industrial, commercial or in any other productive activity, engaging in competitive acts by resorting to violence or threat;
- III. perpetrating conducts designed to cause harm to domestic industries by putting on sale or otherwise making available, in the domestic or foreign markets, industrial products with forged or altered brand names, trademarks or distinctive signs;
- IV. delivering to the purchaser, in the context and/or operation of a business or a shop open to the public, one movable thing for another (*aliud pro alio*), that is to say, a movable thing that due to its origin, provenance, quality or quantity is different from that stated or agreed upon;
- V. selling or at any rate putting into circulation (national or foreign) intellectual or industrial products bearing names, trademarks or distinctive signs likely to mislead the buyer about the origin, source or quality of such works or products;
- VI. manufacturing or using industrially manufactured objects or other goods made by usurping or violating industrial property rights, although aware of the existence thereof, or seeking to benefit from the goods referred to above by introducing them into national territory, detaining them and/or offering them for sale or at any rate putting them into circulation;
- VII. the Group also undertakes not to engage in illegal or unfair conduct, in order to steal trade secrets, supplier lists, or information relating to infrastructure or other aspects of economic activity by third parties. Aquafil, moreover, will not hire employees from competing companies in order to obtain confidential information, or induce employees or customers of competitors to disclose information that they cannot disclose.

Protection of the democratic order and fight against terrorism

The Group demands that all the laws and regulations prohibiting terroristic activities and the subversion of the democratic order are respected; therefore, even the mere membership to associations having such purposes is forbidden.

The Group shall not tolerate the use of its resources to provide financing or otherwise promote any activity whatsoever aimed at achieving the goals of terrorists or at subverting the democratic order.

Furthermore, it is strictly forbidden to each Group Employee, wherever working or assigned, to be involved in any practice or other actions suitable to enact terrorist conduct or subversion of the democratic order. In case of doubt or should a situation appear ambiguous, each employee is required to inform its Head of Department or the Company's lawyer.

Protection of individuals

The Group condemns any conduct aimed at committing crimes against individuals.

Protection of the company against organized crime of national and transnational nature

The Group condemns any conduct shown both on the national territory and abroad by subjects having a top or subordinated position that could even indirectly facilitate crimes such as criminal associations, mafia-related association and hindrance to justice. In this respect, the Group shall activate all prevention and follow-up control measures necessary to the purpose (verifiability, traceability, monitoring, segregation of duties, etc.). The Groups establishes that business relationships should be entertained exclusively with clients, collaborators, partners and suppliers of good reputation which carry out legal business activities and whose profits derive from legal sources. To this end, regulations and procedures are adopted which ensure the correct identification of clients and the appropriate selection and evaluation of suppliers with whom to co-operate.

The Group adopts all the necessary monitoring tools so that the decisional centers inside the Group may act and pass resolutions on the basis of codified regulations and keep trace of their work (minutes of the meeting, reporting procedures, etc.). In this way, the Group may avoid internal associations aimed at committing crimes, using all company's means, resources and assets for this purpose.

The Group promotes development and legality within the territorial areas in which it operates, therefore it promotes participation to any memorandums of understanding (or similar agreements) defined among public subjects, enterprises, industrial category associations and trade union organizations, aimed at preventing criminal infiltrations.

LOYALTY TOWARDS OTHERS

Every employee is required to act fairly with other employees and with all counterparts and, in particular with clients, suppliers and competitors.

No one should gain illicit benefit through treacherous, unfair or fraudulent conducts.

The Group forbids the Recipients to undertake any kind of exploitation (e.g., slavery, etc.), request/offer sexual performances and forced labor. The Company, moreover, shall not tolerate in any case violent behaviors and intimidations towards any employee.

Recipients shall not accept or exercise for themselves or others pressures, recommendations or warnings which may cause prejudice to the Group or illicit benefits for themselves, the Group or third parties; each Recipient, moreover, shall

reject and not make any promise and/or illicit offer of money or other benefits, except for those of modest value and not related to requests of whatsoever nature.

Should the Recipient receive from a third party an offer or a request for benefits, except for gifts of commercial use or of modest value, he/she has to reject the offer or the request and must immediately inform his/her hierarchical superior or the subject responsible for the matter in question.

The Group Companies shall not tolerate exceptions to the policies cited herein. Any violation shall be immediately reported to the competent Authorities and will give rise to disciplinary sanctions.

Relations with clients

The Group shall manage the business relations with Clients in a fair, loyal and professional manner, in compliance with the governing rules, the quality and service standards agreed upon, as well as with the existing agreements. During business negotiations, the Group Companies shall provide clear, accurate and truthful information and undertake the resulting contractual obligations and diligently fulfill the same.

In marketing its products, the Group guarantees their origin, provenance and performance in compliance with the standards pursuant to UNI-EN ISO 9001:2000. The Group shall inform its clients about the contents of this Code; the clients, upon entering an agreement, shall declare to acknowledge the principles contained in the Code, committing themselves to respecting such principles when carrying out the activities undertaken on behalf of the Group Companies and not adopt any conduct which may lead the Company – through its management or employees – to violate the rules specified in the Code.

The Group shall not discriminate arbitrarily its clients. The selection of potential clients and the determination of the sales conditions of the company's goods and/or services shall be based on impartial evaluations regarding consistency, quality, reliability and other qualifying aspects and shall respect the existing corporate procedures. Accurate and complete information shall be provided in relation to goods or services to be sold, in order for the client, even a potential one, to take informed decisions.

Within the process of client selection, all available information related to the clients should be acquired and utilized, besides the ordinary evaluation of commercial nature, also in assessing any possible relation with subjects and activities linked to the organized crime. In this regard, the Group is inspired by evaluation criteria based on the reliability and professionalism of clients.

The acquisition and collection of information related to the main clients should be carried out both at the beginning and during the development of the relationship, in order to verify, besides the correctness of the commercial and administrative data, the clients' maintenance over time of the selection requirements applied by the Group, and in particular the requirement of reliability.

Contracts and commercial agreements must be:

- executed according to agreements between the parties;
- comply with applicable statutory and regulatory provisions, including national and EU anti-trust and fair-trading regulations, as well as any and

all relevant internal procedures, without any attempt whatsoever to circumvent or otherwise bend the rules (such as, for instance, by applying unfair practices against customers and consumers, or imposing unduly burdensome contractual terms on them);

- complete, so as not to exclude any significant element for the purpose of the client's decision.

Furthermore, employees and collaborators of the Group Companies shall not offer or receive gifts, presents or other benefits which may even only be interpreted as exceeding the ordinary business practices or as courtesy or in any case, including when of modest value, as if the gift is aimed at obtaining illicit preferential treatment.

It is not allowed to correspond or offer, directly or indirectly, payments and material benefits of whatsoever nature in order to influence or compensate an action of their office.

In relations and in promotional or business relationships, illegal, collusive practices and conducts, illicit payments, bribery attempts and favoritisms are forbidden.

The Group shall also not exploit conditions of ignorance or incapability of its counterparts.

The Group's activity is focused on the satisfaction and protection of its clients, listening to their requests, favoring an improvement in the quality of products and services. For this reason, it addresses its activity of innovation and marketing to high standards of quality for its services and products.

The Group shall provide feedback to suggestions and complaints made by the clients and customer associations, using appropriate and timely communications systems.

Furthermore, the Group shall retain all information and official documentation regarding the relationships with its clients for the time established by applicable laws and regulations. The said data is retained according to the most appropriate modalities in order to ensure the transparency and traceability of any contractual relations with the same clients.

It is in any case forbidden to undertake disloyal actions to the detriment of the clients.

Relations with suppliers

In the relation with its suppliers, the Group is inspired by principles of transparency, equality, loyalty, impartiality, cost-effectiveness and correctness, avoiding any relations whatsoever that may generate personal advantage or conflict of interest.

The Group shall inform its suppliers about the contents of this Code; upon entering an agreement, the suppliers shall declare to acknowledge the principles contained in the Code, committing themselves to respecting such principles when carrying out the activities undertaken on behalf of the Group Companies and not adopt any conduct which may lead the Group — through its managers or employees — to violate the rules specified in the Code.

Supplier selection is based on objective and documentable criteria, focused on the search of the best balance between economic advantage and quality of the performance. Furthermore, the Group takes into account the economic, patrimonial, financial and technical reliability of the counterpart, as well as the transparency

regarding the origin of the products purchased in order to avoid the procurement of products of unlawful origin such as, for example, counterfeited or stolen goods.

In managing their relations with the suppliers, the Recipients must:

- build transparent, collaborative relations and, in line with the best commercial practices, strictly observe the complex regulatory system provided for by the national and EU law, the procedures envisaged by the quality, security and environmental management systems, as well as by the internal regulations on the selection of suppliers;
- verify the identity of third parties interacting with the Group;
- motivate the selection effected and draft suitable agreements for all supplies;
- ensure the most convenient mix of quality, cost and delivery time;
- avoid any initiative which may give rise to unjustified favoritism, benefiting one supplier over the others;
- not pursue any personal gain in the purchasing operations;
- demand the application of the contractual terms;
- operate in the respect of the governing law and require the same from others;
- avoid any gift, present or other benefit, albeit of modest value, if they are aimed at obtaining unlawful benefits;
- not correspond neither offer, directly or indirectly, payments and material benefits of any value to influence or compensate an action of their office;
- not engage in any illegal or collusive behavior, unlawful payments, corruption attempts and favoritisms;
- avoid effecting any cash donation, distributing gifts outside the corporate practice and grant other advantages of any nature (e.g., hiring promises).

Relations with suppliers are governed by the above-mentioned principles and are constantly monitored.

The supplier is required to communicate promptly any situation and/or circumstance, which may affect the maintenance of the Group's selection criteria. In this regard, the declaration of false or incomplete data by the supplier may entail the termination of the supply agreement.

The Group shall also keep all the information and official documents regarding the relations with its suppliers for the time required by applicable laws. This is carried out using the most suitable methods aimed at guaranteeing the transparency and traceability of any contractual relations with the suppliers.

Relations with outside collaborators (professionals and consultants)

The Group identifies and selects professionals and consultants with absolute impartiality, autonomy and independent judgment.

With regard to the relations with professionals and consultants, the Recipients must:

- carefully evaluate the opportunity to engage external collaborators and select counterparts having suitable professional qualification and reputation;
- motivate the selection of the counterparts;
- build transparent and collaborative relations, in line with the best commercial practice;
- constantly ensure the most convenient mix of quality of the performance and cost;

- demand the application of the contractual terms;
- respect of the governing law and require the same from others;
- not correspond neither offer, directly or indirectly, payments and material benefits of any value to influence or compensate an action of their office;
- not practice any illegal or collusive behavior, unlawful payments, corruption attempts and favoritisms;
- avoid the exchange of courtesy gifts or hospitality not having a mere symbolic value;
- not pay fees that are not justified by the kind of assignment or by the local practice;
- ensure that agreements with the same envisage a clause regarding the respect of the Code of Ethics, attached to the same agreement: the violation of the Code of Ethics may lead to the termination of the agreement.

Relations with Governments, Institutions and Public Offices or Entities acting as public offices

The relations with the Public Administration and Institutions (e.g., Ministers and their detached offices, Public Entities, Entities and Companies operating in the public services sector, Territorial Entities, Local Entities, Privacy Protection Authorities) are managed by the Companies' Top Managers, or by the delegated corporate officer, in the respect of the fairness and transparency principles.

In particular, by way of example and without limitation, both the Recipients and people acting on behalf of the Company are barred from adopting the following behaviors, in Italy or abroad:

- promising, offering or in any way paying or making available any amount of money, goods in kind or other benefits (except for gifts having modest value or use, and in any case compliant with the general business practice), also as a consequence of illicit pressure to public officers or private counterparts in charge of a public office. The above-mentioned prohibitions cannot be eluded by means of different forms of aid or contributions (e.g., assignments, consultancies, sponsorships, employment opportunities, etc.);
- committing any such act involving a foreign government or public authority which may be interpreted as an illicit offer of money aimed at obtaining an unfair business advantage;
- keeping any such behavior with the spouse, relatives or similar of the above-mentioned persons;
- acting in order to unfairly influence the decisions of the officials negotiation or deciding on behalf of the Public Authorities;
- providing or promising to provide, solicit and obtain confidential information and/or documents, such as to affect the integrity or reputation of one or both parties.

The Group also forbids relations with private citizens, corruption, favoritism, collusive behaviors, direct and/or indirect solicitations also through the promise of personal advantage.

The Group does not allow the disbursement of direct or indirect contributions, in money, in kind or any other form to political parties, political and trade union

committees and organizations, nor to their representatives other than in the cases and the ways allowed by the governing law.

In its relations with Institutions and Public Authorities, the Group shall never be represented by Directors, Employees or Collaborators in reference to whom a conflict of interest may arise.

In this regard, the Group forbids the appointment as representative to the subjects who:

- have been accused of illicit business practice;
- are in conflict of interest or have known family relations such to illicitly influence the decisions taken by any subject belonging to the Public Authorities, with the exception of the case in which such situation was preliminarily notified to the Supervisory Board and the latter evaluated the possibility to whether or not grant such power of representation.

The persons appointed by the Group for the management of any relation with the Public Administration for sending documents and/or statements, requiring authorizations, participating to tenders, etc. must verify that the information rendered through any mean and for any reason are true, accurate and correct.

In order to avoid, or in case drastically contain, the risk related to the above-mentioned conducts, every employee, according to his/her powers and functions, must timely report to his/her hierarchical superior any doubts regarding a possible violation of the Code by an external collaborator.

Without prejudice to the obligations envisaged by the applicable laws and regulations on the matter, the Recipients must avoid, during business negotiations, to request or business relations with the Institutions and Public Officers, the following (direct or indirect) conducts:

- examining or proposing employment and/or business opportunities which may personally advantage employees of the Institutions or Public Officers;
- offering or in any way providing, accepting or encouraging gifts, favors, conduct or business practices not characterized by the highest degree of transparency, fairness and loyalty, and in any case all those not compliant with the applicable laws;
- soliciting or obtaining confidential information which may affect the integrity or reputation of both parties or in any case violate the fairness and public procedures of the Institutions or Public Officers.

Work relations with subjects belonging to the Public Authorities

It is forbidden to employ or hire as consultant any former employees from the Public Administration, either Italian or foreign, who, on the basis of their institutional functions, participate or have personally and actively participated to business negotiations or accepted requests from the Company to the Public Administration, either Italian or foreign; exception is made in case such relations have been previously and suitably notified to the Human Resources Manager and evaluated by the Supervisory Board before any hiring.

Loans/aids by the Public Administration

The Group condemns any conduct aimed at obtaining from the State, the European Union or other public entities any type of aid, loan, concessional loan or any such

disbursement, through altered or falsified returns and/or documents, and more generally through artifices or deceptions, including the use of a computer or data transmission system, intended to mislead the disbursing body.

The Group guarantees the respect of the binding destination for the contributions, aids or loans aimed at favoring initiatives for the realization of works or to the carrying out of activities of public interest, obtained by the State or by another public body or by the European Union, even if of modest value and/or amount.

Inspections by the Public Administration

The Group shall maintain absolutely transparent and collaborative relations with the Public Administration. Any Public Official requiring information must be treated with the utmost courtesy but shall receive only publicly available information. With regard to any other request, in order to guarantee that the Public Official is only provided with accurate and verified information, ask the request for information to be formally delivered. The information required shall be verified by the competent Departments and provided to the Public Official by a person appointed by the Group Company to release official information.

In case a Recipient is involved under any title in a trial on behalf of a Group Company, the same shall render true declarations and abstain from conducts that may hinder the activities of the Public Administration, in compliance with the law and with the principles of loyalty, fairness and transparency.

It is absolutely forbidden to adopt a conduct such as to condition or influence the declaration of the subject summoned by the Public Administration as part of a criminal trial and entitled to exercise the right to decline to answer; it therefore required from all the corporate functions interacting with the subject, by reason of carrying out the work activities, not to adopt any conduct which may influence the subject (i.e., decisions on performance evaluation or on the granting of premiums or on possible disciplinary sanctions, etc.) in order to safeguard the subject's autonomy and independence in rendering his/her declarations before the Judicial Authorities.

It is explicitly forbidden to:

- carry out any activity which may favor or damage any of the parties;
- condition in any way the will of the subjects summoned by the Judicial Authorities;
- promise/offer money or other utilities to subjects involved in trials or to people close to them.

Relations with Public Supervisory Authorities

The Recipients must strictly respect the provisions issued by the competent Institutions and Public Supervisory Authorities for the observance of the governing law in the industries connected to the respective areas of activity.

The Recipients, within the inquiries existing with Institutions and Public Supervisory Authorities, must not file requests containing untruthful declarations aimed at obtaining undue concessions, authorizations, licenses or other administrative deeds.

The Recipients must comply with every request coming from the above-mentioned Institutions or Authorities within the respective supervisory functions, providing – if requested – full collaboration and avoiding obstructing conducts.

HEALTH AND SAFETY

The Group shall carry out its business with the utmost focus on the work environment and the safety of its own personnel and third parties, constantly aiming at the enhancement of its performance on the matter and the timely implementation of the provisions on the workplace safety, whose respect shall be ensured.

The responsibility of each Recipient towards its collaborators and colleagues requires the utmost attention in the prevention of accident risk. Employees must observe the established security and prevention measures, in order to avoid any possible risk for themselves, their colleagues and third parties.

In particular, Employees must observe instructions and guidelines issued by the subjects whom the Company has delegated the fulfillment of the obligations regarding health and security in the workplace.

With particular reference to the activities having high impact on the health and safety of workers, each Group Company ensures that:

- i. risks for workers are avoided, as far as possible and guaranteed by the best technical means, also by choosing the most suitable materials and equipment in order to mitigate the risk at source;
- ii. non-avoidable risks are correctly evaluated and suitably mitigated through the adoption of the appropriate collective and individual security measures;
- iii. workers' information and training are widespread, updated and specific with reference with the job assigned;
- iv. any need or non-compliance with the safety law emerged during the work activities or controls or inspections is addressed quickly and effectively;
- v. the organization of the work and the operational aspects of the same are such as to safeguard the health of workers, third parties, the community and the environment in which the Company operates.

In order to achieve the above-described aims, the Group grants organizational, instrumental and economic resources to guarantee the full observance of the applicable risk prevention regulation and the ongoing enhancement of the health and security of workers in the workplace and of the relevant prevention measures.

THE ENVIRONMENT

Safeguarding the environment as a whole is an integral part of the corporate mission. The Group shall conduct all its activities in the respect of the Environmental Sustainability Principles, acting through tangible choices, rationalized under the following guidelines:

- direct commitment for a constant reduction of the impact of production activities;
- design of increasingly sustainable products;
- attention to the needs of all stakeholders and the local communities in the countries where the Group operates;
- willingness to encompass inputs from those Clients that make Sustainability their development strategy;
- preference for those suppliers with best performances in terms of Sustainability.

The Group shall respect all provisions regarding the safeguard of the environment.

Employees must continuously support the Group in achieving the aims defined within the environmental strategy, based on the following pillars:

- ✓ Products (reduce as much as possible the products' environmental impact);
- ✓ Standards (respect and, if possible, exceed "environmental" standards and laws);
- ✓ Waste (decrease the quantity of raw materials used for the products);
- ✓ Recycle (use recycled/recyclable materials in the products, whenever possible);
- ✓ Awareness (educate Employees and the community to decrease the production of waste and the excessive use of resources);
- ✓ Research (develop new products in line with environmental responsibility principles);
- ✓ Structures (define and maintain programs to plan and manage structures, respecting and, where possible, exceeding the standards provided for by laws and regulations);
- ✓ Decisional criterion (take into account environmental matters in all main corporate business operations);
- ✓ Responsibility over the past (act responsibly to settle any negative environmental impact of the past business practices).

CONFLICTS OF INTEREST

Employees must refrain from privately cultivating any business opportunity which may interest the Group. Employees having responsibility positions and their closest relatives cannot be involved in any transaction, even if only potentially, in competition with one of the Group Companies (unless the said transaction is declared and authorized). No Employee can pursue business opportunities which interest the Group or may compromise the capacity to decide in the Group's best interest.

A conflict of interest is present when personal activities or relationships interfere, even only apparently, with the Recipient's capacity to act in the best interest of the Group which he/she works for.

Every situation potentially suitable to generate a conflict of interest must be immediately notified by the Recipient to his/her hierarchical Superior/company reference person and gives rise to the obligation to abstain from carrying out any act connected or related to such situation.

Examples of conflict of interest may be:

- Operating as consultant or employee of an external company, which:
 - ✓ Trades products/services competing with the Company's (even if in the development phase);
 - ✓ Supplies products or services to the Company;
 - ✓ Purchases goods and services from the Company.
- Operating as consultant or employee of an independent company in case the obligations deriving from such job interfere in any way with the Employee's responsibilities towards the Group.
- Managing, on behalf of the Company, operations with his/her own family members.

- Accepting money, favors or utilities from people or companies which already or prospectively carry out business with the Company.

Pursuant to Article 2391 of the Italian Civil Code, each and every director is duty-bound to inform all the other directors, as well as the Board of Auditors, of any and all interests held, on his/her own account or on account of third parties, in any transaction effected by the Company, specifying the nature, terms, origins and extent of the interests in question.

Directors shall abstain from voting on the said business operation or transaction.

INFORMATION AND DATA PROTECTION

Handling of “confidential information”

It is to be considered “confidential information” the knowledge of projects, proposals, initiatives, negotiations, agreements, contracts, facts or events, including future and uncertain in nature, regarding the Group’s business and not publicly available, which may be of prejudice to the Company if made public.

Anyone who, during the course of work, becomes aware of classified and/or confidential information must keep it confidential.

The Company protects confidential information regarding clients, suppliers and listed business partners emerged during the course of work. Furthermore, it is forbidden to all employees and collaborators to obtain, with unfaithful and treacherous means, confidential information regarding clients, suppliers and business partners.

Any form of exploitation or use for economic purpose or investment, both directly or through a third party, of corporate information classified as confidential is contrary to the law, and therefore strictly forbidden.

Handling of “inside information”

“Inside information” within the meaning of Article 181 of TUF means any information of a precise nature, which has not been made public and relating, directly or indirectly, to one or more issuers of financial instruments or one or more financial instruments, that, if made public, could have a significant impact on the prices of the said financial instruments.

The Group provides for and ensures adequate management and protection of Inside Information through the implementation of specific procedures and the setting up of a Register of Insiders, i.e., persons with access to inside information.

To enable the market to function properly, the deliberate dissemination of false information regarding the Group and/or its collaborators is strictly prohibited both within and outside the Group.

Trading in securities issued by the Group or any other corporation on the basis of Inside Information regarding the Group or the corporation concerned is strictly prohibited.

Disclosure of information or carrying out of operations on financial instruments

It is forbidden to disseminate, both within and outside the Group Companies, false information regarding the same Companies, their employees, collaborators and third parties engaged by the same.

Consistently with the principles of transparency, completeness and fairness of information, external communications must respect the right to information. In no case, the Recipients shall consciously spread comments or information which are untrue or based on non-objective facts. Corporate and product advertising of the Group Companies respects the fundamental ethical values of the civil society in which the same is distributed, keeps true contents and disowns the use of vulgar or offensive messages.

Any transaction involving shares or financial instruments of companies must be exclusively managed by the dedicated corporate functions.

The purchase and/or the sale of shares and/or own securities and/or securities issued by other entities or companies must always be authorized by Top Management (CEO).

Any conduct whatsoever aimed at fraudulently altering the market prices of financial instruments is strictly prohibited.

As a result, no transaction may be effected solely with a view to influencing financial markets by provoking an artificial rise or fall in the prices of stocks, securities and financial instruments.

All persons serving Group Companies, whether as employees or outside collaborators, must comply with the rules pertaining to the free market price setting of financial instruments, and strictly avoid engagement in any behavior or activity that could result in a significant change in actual market prices.

PROTECTION OF INTELLECTUAL PROPERTY

The Group adopts suitable measures aimed at protecting its own intellectual property, including copyrights, patents, brands and distinctive signs and at not violating others'.

In particular, the Group shall:

- refrain from using non-proprietary technology and/or creative content or designs, save pursuant to proper licensing;
- use brands, whose use is available to the Company thanks to a legitimate entitlement.

With regard to relations with suppliers, the Group requires, when possible, that the same guarantee that the goods and their intended destination not violate third party's rights on industrial property (brands and patents). In such relations, the Company adopts suitable indemnification measures against any claim, legal action and request for damage which may rise from the violation of patents, brands or trademarks.

In no case is it allowed to trade products with patents, brands or other distinctive signs counterfeited or altered, or such as to deceive the purchaser with regard to the origin, source or quality of the product.

USE OF CORPORATE PROPERTY

The Group Companies shall make available to the Employees the equipment necessary to perform the job required in the respect of the safety measures envisaged by the applicable provisions in force.

In no case, the use of corporate properties is allowed for aims contrary to the provisions of law, the public order and common decency, as well as for perpetrating or leading to the perpetration of crimes.

The use for private purposes of the corporate properties is forbidden. Theft or abuse of the corporate properties and any trickery put in place to cover theft, abuse and shortage may lead to disciplinary sanctions, including termination of employment and reporting to the competent authorities. Theft or damage of goods belonging to other Recipients shall be treated in the same way as the theft of corporate properties.

Use of the IT System

Nobody is allowed to use the corporate IT system to access, view, post, transmit, download or distribute contents which are obscene, offensive, harassing, inopportune or in any case not compliant with laws and regulations, as well as aimed to perpetrate or lead to the perpetration of crimes, damage or alter the IT systems or the same information and illegally obtain confidential information.

Moreover, no Employee is allowed to install unlicensed software on corporate PCs or use and/or copy documents and materials protected by copyright (registrations or audio-video, electronic paper or photo reproductions) without the express consent of the copyright holder, with the exception of those case in which such activities are encompassed in the ordinary course of the job assigned. Finally, it is explicitly forbidden to illegally download material and transmit to third parties contents protected by copyright.

Moreover, the Group condemns the use of databases (extraction, reproduction of data, public presentation, etc.) for purposes different from those for which the same have been set up and in any case contrary to the use allowed by the copyright protection law.

ACCOUNTING AND INTERNAL CONTROL

A correct management of all accounting obligations is reflected on the corporate reputation and trustworthiness. Accounting data are not limited only to financial information, but encompass other documents such as expense notes and any other document containing information of accounting, administrative and financial nature. The Group shall respect all applicable provisions and, in particular, the regulations concerning the preparation of financial statements and any kind of compulsory administrative-accounting documentation.

Bookkeeping is based on the generally accepted accounting principles and systematically records the business facts. All accounting operations must be accurately reflected in the corporate bookkeeping and in no case is it possible to justify incomplete, inaccurate accounting records, non-corresponding to the underlying operations and supported by suitable documentation.

In general, every Employee must keep accurate documents and reports. For every accounting record, the suitable support documentation must be kept. Such documentation shall make the rationale of the underlying operation and the relevant authorization traceable. The support documentation must be easily found and kept, in order to facilitate its consultation.

The Recipients must timely communicate the existence of errors or omissions in the accounting records of the business facts. Employees who have consciously prepared or authorized significantly inaccurate or incomplete reports shall be subject to disciplinary measures.

Should there be trials, investigations or inspections, the Group Companies shall make the requested documentation available and shall not destroy any official document until the end of the procedure.

Relations with the corporate Supervisory Bodies

The Group's relations with the corporate Supervisory Bodies are characterized by the utmost professionalism, transparency and collaboration. In the full respect of their institutional role, the Group shall timely and promptly execute any required obligation.

The corporate Supervisory Bodies are granted free access to data, documents and information necessary for carrying out their activities. Data and documents are made timely available and are written in a clear, objective and exhaustive language, in order to provide accurate, complete, faithful and true information.

It is forbidden to hinder or impede the supervisory activities of such bodies.

Safeguard of the rights of the corporate creditors

The Group expressly forbids to its employees and to those acting on its behalf to effect any transaction in prejudice of its creditors.

In fact, the Group pursues the ethical principle of protecting the corporate creditors' interest in not seeing the guarantees of their credit diminish.

Therefore, it is forbidden that the directors effect capital decreases or mergers with other companies or demergers aimed at damaging creditors.

Use of notes, public credit cards and stamps

The Group is sensitive to the need of ensuring business fairness and transparency and thus requires Recipients to observe the governing laws on the use and circulation of money, public credit cards and stamps and shall therefore severely sanction any conduct aimed at the illicit use and falsification of credit cards, stamps, coins and notes.

Internal Controls

The Group has an internal control system (tools and processes necessary or useful to address, manage and control the Company's activities) aimed at guiding the corporate organization, monitoring the achievement of the defined targets, as well as ensuring the application of the provisions of law.

Each Employee, within the scope of his/her own function, is responsible to define and manage the control system and to keep the supporting documentation for the operations effected.

HUMAN RESOURCES AND HR POLICIES

Loyalty, capacity, professionalism, reliability and training of personnel represent determinant values and conditions to pursue the Company's objectives.

The Group shall support the professional development of each employee or collaborator and operate in order to create and maintain an open dialogue and a loyal collaboration.

Selection, valorization and professional training

Selection and hiring of personnel must strictly respect the Group's regulations and must be transparent with regard to the evaluation of the competence, professionalism, reliability, capacity and potentiality requisites.

The Group shall operate so that:

- the resources hired correspond to the profiles actually searched, avoiding favoritisms and facilitations;
- merits and respect of equal opportunities are acknowledged;
- competences, skills and knowledge are developed for each employee also through training and professional update activities.

It is also forbidden to merely promise salary increases, or other advantages or career advancements in exchange for activities non-compliant with the law and the Code.

Personnel is hired under regular employment contract; no irregular work form shall be tolerated.

Moreover, it is forbidden to hire foreign workers with no residence permit or with an expired or revoked permit, for which it has not been filed a renewal request, documented by the relevant mailing receipt.

Equal Opportunity

Each Recipient acknowledges and respects personal dignity, privacy and the personality rights of each individual. The Recipients work with women and men of different nationalities, age, culture, religion and political ideas. No discrimination, harassment or offense of any nature shall be tolerated.

Work Environment

All Employees must collaborate to maintain a serene and welcoming internal environment and respect the defined organizational structures, also to allow the definition of a precise and articulated responsibility framework.

All Recipients must value the different social and cultural background of their colleagues and create an environment in which ideas can be freely expressed in an atmosphere of reciprocal trust and respect.

Within the work environment, all Recipients must keep a conduct characterized by reliability, order and decency.

The Company expressly forbids intolerance against others in the workplace.

Remuneration

The Group shall determine the Employees' compensation, both in money and in kind, exclusively based on evaluations related to specific professionalism, experience acquired, merit demonstrated and achievement of the assigned targets.

Travel and expenses refunds

The Group shall ensure to the transferred Employee a decent treatment and work and life conditions in line with those ensured by the ordinary work location. Dedicated policies are in place for the management of travel and expenses refunds. All expenses must be adequate and in line with the principles of the Code, in addition to being supported by the suitable documentation.

Political and Trade Union activities

Relations with political parties, trade unions and other associations are kept by the Top Management or by the delegated corporate representatives in the respect of the

provision of this Code, with particular regard to the impartiality and independence principles.

Trade Union activities are free and managed in compliance with the provisions of the Statute of Workers.

The Group shall not disburse, in any case, funds or contributions for political parties or candidates.

GIFTS AND PRESENTS

The Group shall manage its activities with clients and suppliers in the respect of the fairness and transparency criteria, leveraging on high service and quality levels, without promising or accepting any valuable, which may in any way influence the outcome of the transaction.

Consequently, it is forbidden the Recipients offer or promise to third parties, as well as accept or require from third parties, either directly or indirectly, also in occasion of holidays, unauthorized gifts, hospitality, benefits or other utilities (also as money, goods or services), unless these have a modest value.

Only gifts of modest value, directly connected to ordinary business and courtesy relations, are allowed; in any case, such gifts must not generate in the other party or in an impartial, independent third party the impression that the same are aimed at acquiring or granting undue advantages.

DECLARATION OF APPROVAL AND ACCEPTANCE OF THE CODE OF ETHICS

The declaration of approval and acceptance of the Code of Ethics must be renewed and re-signed by all Recipients, whenever the Code is updated.

The signed declarations are maintained by the Department managing the employment or contractual relationship with the Recipient in question (such as HR, Procurement, etc.).

“I, the undersigned, declare that I have read and understood the Code of Ethics of the Aquafil Group. I also declare that I accept the Code of Ethics in all its parts and am fully aware that I am duty-bound to strictly comply with the provisions of the said Code, and that any and all breaches of the Code on my part could result in disciplinary action in accordance with applicable regulations.”

Full name

Position

Signature

Date