

Abstract
Code of Conduct



Aquafil S.p.A.: Code of Conduct

Guidelines and Main Principles of the Aquafil S.p.A Group regarding:



Respect for laws



Relations with others



Environment, Health, Safety

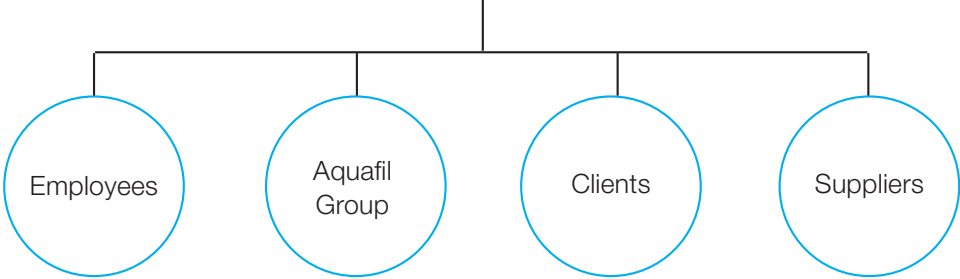


Internal Control



Human Resources / Human Capital

Recipients



Fair-play



Loyalty



Diligence

Code Values

These are the main features of the Code of Conduct



Respect for Laws



Money- Laundering

Fair-play and Transparency

- Respect for anti-money laundering norms as per Competent Authorities
- Commitment of the Group and all subjects involved to avoid any implication in illegal activities
- Checks and Monitoring of internal and external personnel



Safeguarding of Democratic Order Against Terrorism and Criminal Associations

Prevention and Control

- Ban on belonging to any type of terrorist groups or the mafia
- Ban on carrying out criminal activities
- Activation of all activities of monitoring in order to stop such crimes
- Checks on legitimacy of clients to undertake business relations



Safeguarding of Industry, Business and Antitrust

Loyalty and Fair-play

- Respect for in force anti-trust regulations
- Commitment to not carrying out unfair actions towards business counterparts
- Respect for clients, avoidance of aggressive or deceptive business policies



Import/Export

Respect and Compliance

- Compliance to norms that regulate import/export activities
- Attention to and respect for temporary national and international restrictions



Privacy and Individuals

Safeguarding and Confidentiality

- Commitment of each recipient to conform to the principle and norms regarding privacy
- Safeguarding and confidentiality of information and company produced data
- Protection by the Group for the personal information provided by employees
- Privacy management through clear and transparent methods



Relations with Others



Clientele

Professionalism and Equity

- Management of fair and professional business relationships
- Respect and maintenance of quality and service standards
- Orientation towards satisfying and safeguarding clients
- Contracts and agreements that are complete, in compliance and informed
- Transparency and traceability of all contractual relations
- No discrimination, nor pressure or intimidation
- Acquisition of information related to clients in order to monitor requirements (reliability)



Suppliers and External Suppliers

Fair-play and Impartiality

- Selection made based on objective criteria
- Search for better equilibrium between economic advantages and performance quality
- Checks and controls of third-party subjects
- Respect and care in applying contractual conditions
- Professional suitability
- Transparent and cooperative relations in order to achieve best results



Governments, Institutions, Public Administrations and Offices

Transparency and Respect

- All types of corruption are forbidden when dealing with institutions, political parties, public administrations and entities
- Transparency and collaboration with Public Administrations
- Ban on relations with Public Administration executives who have taken part or are taking part in business negotiations or have endorsed requests from the Company
- Respect for obligations regarding contributions and subsidies in the realization of works or activities of public interest



Public Authorities and Vigilance

Collaboration and Scrupulousness

- Scrupulous observation of regulations coming from competent institutions in full compliance with norms
- Ban on obstructionism



Enviroment, Health and Safety



Worker Safety

Attentiveness and Updating

- Attentiveness and safeguarding by the Group of the work environment and safety of its personnel
- Interest for constant performance improvement
- Observation of safety norms by all recipients, in order to prevent injuries risk
- Organization of work in order to safeguard workers' health
- Training, information and updating of employees on safety



Environmental Sustainability

Concreteness and Rationality

- Respect for principles of environmental sustainability
- Reduction of environmental impact of production activities
- Selection of suppliers based on best performace in terms of sustainability
- Respect of norms regarding environmental safeguarding
- Concrete education, maintenance and commitment of employees for better awareness of the environmental impact and intelligent actions
- Reduction of waste and use of recyclable materials
- Consideration for environmental issues in all company's business operations



Internal Control



Information and Confidentiality

Confidentiality and Fair-play

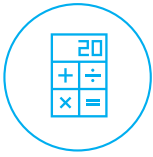
- Maximum confidentiality of anyone with knowledge of reserved and confidential information
- Prohibition to exploit and use of confidential information
- It is forbidden to spread false news and/or information, in compliance with the principles of transparency, completeness and fair-play of information, as per Law



Safeguarding of Intellectual Property

Legitimacy

- Use of ideas, elaborations and trademarks only when having the right of use
- Guarantee by suppliers that their goods and their purpose do not violate third-party rights with regards to industrial property
- Ban on marketing products with patents, trademarks or other distinctive features that lead to deceiving consumers regarding origins and quality of product



Accountability

Transparency and Clarity

- Accounting data refers to any document containing accounting, administrative and financial information
- Drafting of accurate reports by each recipient
- Errors and omissions will be reported in a timely fashion
- Internal control systems to monitor the Group's performance regarding achievement of goals and regularity of activities
- Guarantee of free access of data by company control organisms
- Ban on any damaging actions towards company creditors



Human Resources / Human Capital



Conflict of Interest

Integrity and Loyalty

- It is forbidden to do business privately when the same opportunity may interest the Group
- Ban on acting as a consultant or employee of competing companies, suppliers or buyers of the Group itself
- Ban on accepting any type of corruption from potential clients of the Company



Employment Policy

Seriousness and Equality

- Attentiveness in selection of personnel, with the objective of looking for loyalty, skill and professionalism
- Rigorous and impartial selection, with respect for professional, cultural and gender dignity
- Regular stipulations in work contracts
- Support in professional development and an open dialogue with employees and collaborators
- Maintaining an internal serene and welcoming working environment
- Salaries and reimbursements determined in work contracts
- Nomination of company reference delegates to take care of political and union activities in conformance with provided norms



Registration Form

Company Name

Address

Company Reference Person

UNDERSIGNING THE PRESENT DOCUMENT ALSO IMPLIES ACCEPTING IT
INTEGRALLY AND COMMITTING TO RESPECT IT.

Date

SIGNATURE

The integral version of this document from Aquafil is available for consultation and in-depth investigation in the section "FINANCE – CODE OF CONDUCT" on the site www.aquafil.com



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Aquafil S.p.A.

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Enrollment in the Register of Companies of Trento no. 123150229

Tax Code and VAT Number 00123150229