

SUPPLIER ETHICAL CODE

ORGANIZATION, MANAGEMENT AND CONTROL MODEL – CDF

LIST OF ATTACHMENTS

EDITION VARIANTS 01

Various corrections and clarifications

EDITION VARIANTS 02

Update following organizational change

EDITION VARIANTS 03

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APPROVED	
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1 INTRODUCTION

Salgomma S.r.l. has adopted an Organization, Management and Control Model designed to prevent the risks of committing the offenses envisaged by Legislative Decree 231/2001 and subsequent amendments and to limit any impacts in the event that illegal acts are committed by fraudulently evading this decree. This document is an integral part of the model.

Salgomma s.r.l. intends, through the Code of Business Conduct:

- define and explain the general ethical values and principles that govern their business and the relationships with employees, collaborators, customers, suppliers, public institutions, citizens, environment and territory and any other person involved in the company's activity
- formalize the commitment to behave on the basis of the following ethical principles: legitimacy morality, fairness and equality, personal protection, environmental protection, diligence, transparency, honesty, confidentiality, impartiality, health protection
- indicate to their employees and collaborators the principles of behaviour values and responsibility for which the timely compliance is required during the provision of the job.

In any case, the Code of Corporate Behavior does not replace and does not prevail over the laws in force and the National Bargaining Agreement in place and is in substantial continuity with the ethical rules and corporate conduct already issued and adopted by Salgomma s.r.l.

2 GENERAL PRINCIPLES

Recipients of the Corporate Code of Conduct are all those, without exception who, directly or indirectly, permanently or temporarily, establish relationships with Salgomma s.r.l. and work to pursue its objectives.

Compliance with the rules contained in the Code of Ethics must be considered an essential part of the contractual obligations of the employees of Salgomma s.r.l. pursuant to the provisions of art. 2104 and following of the Civil Code.

The violation of the rules of this document damages the relationship of trust established with Salgomma s.r.l. and will be sanctioned in a manner proportionate to the seriousness of the infringement committed, in accordance with the provisions of the disciplinary system defined by the Organizational Model.

Salgomma s.r.l. commitment

Salgomma s.r.l. undertakes to ensure knowledge of this document by:

- distribution to all employees and direct collaborators.
- posting in a place accessible to all at the Mappano headquarters - (TO)
- specific information to customers, suppliers and to all those who have relationships with Salgomma s.r.l.

Salgomma s.r.l. also undertakes to:

- adapt the contents of this document to changes in legislation.

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- carry out the appropriate checks in the event of violations of the rules contained in this document
- apply the sanctions envisaged when the violation is ascertained
- make sure that the staff understand the importance of complying with the rules contained in this document.

Obligation of the shareholders, directors, employees and collaborators of Salgomma s.r.l.

To the shareholders, directors, employees or collaborators of Salgomma s.r.l. Knowledge of the principles and contents of the Code of Ethics and the reference standards governing the activity carried out by one's function is required.

Specifically, the aforementioned roles have the obligation to:

- refrain from conduct contrary to these rules, principles and regulations;
- contact their superiors, company contacts and the Supervisory Body to ask for clarification regarding their application;
- report to the Supervisory Body, in a timely manner, possible cases or requests for violation of the Code of Ethics;
- collaborate, if requested, in verifying any violations;
- adequately inform any third party about the existence of the Code of Ethics

Implementation and control

The Supervisory Body (SB), established pursuant to art. 6 of Legislative Decree 231/01, has the task of supervising the operation and compliance with the Organization, management and control model pursuant to Legislative Decree 231/01, including this document, ensuring its updating.

The SB, in collaboration with the Chief Executive Officer, prepares and carries out training initiatives differentiated according to the role and responsibilities.

Ethical principles sources

In preparing this document, the existing control procedures and systems were considered, in the cases they were deemed suitable to be valid also as measures for the prevention of crimes and control of areas at risk.

In particular, the following documents aimed at preventing the crimes identified in the analysis of the sensitive activities of Salgomma s.r.l have been identified:

- Analysis of the risk of committing offenses in the context of Legislative Decree 231/2001
- Regulations of the Supervisory Body (Supervisory Body)
- Manual of the organization, management and control model pursuant to Legislative Decree 231/2001
- Ethical code
- Company procedures, documentation and provisions relating to the corporate hierarchical - functional structure (organization chart, job descriptions, profiles, etc.)
- Disciplinary system of the Conapi National Collective Labor Agreement for the plastic-rubber sector

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- Administrative, accounting, financial and reporting system
- Responsibilities, powers, proxies and powers of attorney
- Application of Legislative Decree 81/08 on workplace safety and related documentation
- In general, the applicable Italian legislation.

3 HEALTH AND ENVIRONMENT PROTECTION

Salgomma s.r.l. considers the health, safety of workers and those who work within their business, the protection of the territory and the environment to be essential objectives.

Salgomma s.r.l. adopts all the necessary measures for the elimination of risks and, where this is not possible, their reduction to a minimum, for the respect of ergonomic principles in the organization of work, for the implementation of protective measures, encouraging constant evolution aimed at improving the working environment.

Salgomma s.r.l. is aware of the need to preserve the environment and in line with the principles of sustainable development, it undertakes to maintain an environmental management system aimed at ensuring the continuous improvement of its environmental performance and the satisfaction of all relevant regulatory provisions, applicable to activities.

For this purpose Salgomma s.r.l. poses the consequent actions:

- a) take all necessary measures to limit the risk of contamination of surface water and soil, and air pollution;
- b) optimize the management of waste produced by minimizing non-recyclable waste;
- c) rationalize the consumption of resources and energy;
- d) to prevent, whenever possible, emergencies of an environmental nature;
- e) contribute to the dissemination of greater environmental awareness among interested parties.

To ensure compliance with these principles, Salgomma s.r.l. .:

- uses the best technologies available as long as they are economically compatible;
- trains and motivates internal and external personnel so that any work activity is carried out in line with the principles of this policy;
- evaluates in advance the environmental impacts of the new plants, substances and materials used;
- implements a preventive approach to the management of environmental problems;
- undertakes external initiatives necessary for the development of environmental awareness even with knowledge of this document.

Each employee is responsible for the implementation of the principles and the achievement of the objectives indicated in this document, making it an integral part of all his activities.

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4 CODE OF BEHAVIOUR

In compliance with the provisions of the Confindustria guidelines, Salgomma s.r.l. defines the ethical principles of reference for all subjects required to comply with the Code of Ethics.

Salgomma s.r.l. adheres and adopts in its own way of acting and in the procedures and guidelines the Italian Constitution and the law 20 May 1970, n. 300 (Statute of workers).

The Conventions of the International Labor Organization (ILO) are addressed to ILO member states and not to individuals or companies. In compliance with Salgomma s.r.l. adopts internal procedures and guidelines that protect the conventions adopted by the Italian State and which concern forced labor, the right to organize, discrimination, maternity protection and child labor. Salgomma S.r.l. it also adopts the principles set out by the United Nations Global Compact in its objective of founding a more sustainable and shared economy, using internal procedures and guidelines relating to the issues dealt with by the United Nations in the field of human rights, labor standards, the environment and the fight against corruption.

Compliance with laws and regulations

The essential principle of the company is compliance with laws and regulations in force.

Each employee of the company must therefore undertake to comply with the laws and regulations in force. This commitment must also apply to consultants, suppliers, customers and anyone who has relations with the company. The company will not initiate or continue any relationship with anyone who does not intend to align with this principle.

Confidentiality

The information that employees / collaborators have become aware of in the performance of their professional functions must be handled with extreme confidentiality and must never be used for personal profit or purposes. This information must be clear and transparent.

Confidential information is:

- a) corporate, strategic, economic / financial, accounting, commercial, management, operational plans;
- b) projects and investments;
- c) data relating to personnel, customers, suppliers, users and in general all data defined as sensitive;
- d) company performance and productivity parameters;
- e) corporate agreements, commercial agreements and contracts, corporate documents;
- f) the know-how related to the production of molded rubber items;
- g) databases such as suppliers, customers, employees and external collaborators.

Employees, in processing such data and information, must pay the utmost attention and confidentiality. In particular they must:

- a) keep news and information learned in the exercise of their functions confidential and which are not subject to transparency in accordance with the law and regulations;
- b) observe the duty of confidentiality even after the termination of the employment relationship;

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- c) consult only the documents to which they are authorized to access, making use of them in accordance with their duties and allowing access only to those who have the right to do so and in compliance with the prescriptions given;
- d) prevent any loss of data by observing the security measures given, keeping the documents entrusted with order and care and avoiding making unnecessary copies.

Diligence and good faith

Each employee and / or collaborator must act loyally and in good faith, respecting the contractually signed obligations and ensuring the required services. He must also know and observe the contents of this document, basing his conduct on respect, cooperation and mutual collaboration.

Documentation of activities

All activities, actions, transactions and operations of the Company must be:

- carried out in compliance with current regulations, maximum management correctness, completeness and transparency of information and both formal and substantive legitimacy
- carried out in compliance with the instructions and procedures and within the limits of the powers received and the budgets defined by the CEO, as well as being legitimate, consistent and congruous.
- carried out in compliance with the rules contained in the Code of Ethics.

Fair competition

All activities, actions, inherent to commercial practices must be carried out in terms of correctness and truthfulness in advertising and other commercial communications of the product without deceiving the Customer.

The commercial area staff carries out their business with the utmost respect and excluding any form of unfair competition.

Furthermore, each activity is carried out in compliance with the provisions of the Code of Ethics.

4.1 Forced and child works

In nessun caso Salgomma s.r.l. farà ricorso al lavoro forzato o obbligatorio e non ricorrerà all'uso del lavoro minorile.

Tale principio è utilizzato anche come standard nel processo di selezione dei propri fornitori.

4.2 Right to organize

Salgomma s.r.l. recognizes and respects the freedom of employees to choose whether to enter into relationships or associate with organizations recognized by the Italian state, without prior authorization from the company. Salgomma s.r.l. will not subordinate the hiring of a worker to the fact that he does not join any trade union or that he resigns from it.

Furthermore, Salgomma s.r.l. it will not fire a worker, or harm him in any way, because of his membership in a union.

Salgomma s.r.l. respects, in compliance with local laws and regulations, national and local collective agreements and company practices, the right of its employees to be represented by trade unions or other workers' organizations, undertaking to negotiate with them, directly and on

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its own or through the representative associations of employers, to reach agreements on the working conditions of their employees.

4.3 Collective bargaining

Salgomma s.r.l. adopts for its employees the National Collective Labor Agreement signed between Confapi and the trade unions for workers in the small and medium-sized plastics and rubber industry

4.4 Remuneration and Holidays

Salary, working hours and paid annual leave are determined in compliance with national legislative rules and the application of the National Collective Labor Agreement and in line with the applicable sector regulations.

4.5 Discrimination

Each male or female worker of any nationality, or with the right to work within the Italian territory, has the right to equal opportunities and will be treated fairly both during the hiring phase and during the employment relationship. Salgomma s.r.l. offers equal pay for the same work performed and equal classification. No form of harassment or discrimination, such as discrimination based on age, sex, ethnicity, pregnancy, language, religion, political or other opinion, country of origin or social background, birth or other status, will be tolerated neither when hiring nor during the employment relationship.

4.6 Behavioral rules for employees and consultant

Salgomma s.r.l. proceeds with the identification and selection of collaborators and consultants with absolute impartiality, autonomy and independence of judgment.

Behaviour contrary to the principles expressed in this document can be considered a serious breach of the duties of fairness and good faith in the execution of the contract, a reason for damage to the fiduciary relationship and a good reason for terminating contractual relationships. Collaborators and consultants who have relations with the Company are required to avoid any situation of conflict of interest with the same, undertaking, in the event of a conflict, to report it immediately to the Company.

This is foreseen by specific clauses contained in the contracts with collaborators and consultants.

5 THIRD PARTIES RELATIONS

Each employee must be aware of the fact that their behaviour profoundly influences the public image of the company and the opinion of its customers both internally and externally. honesty is the principle behind the company messages addressed to both internal and external audiences.

Payments, loans or other benefits, which are aimed at obtaining personal or non-personal advantages, are not allowed. Salgomma s.r.l. strictly forbids any type of participation or even the simple tolerance of corruption actions that involve the payment of bribes or other forms. Salgomma s.r.l. strictly adheres to customs and anti-corruption laws, as well as the provisions of the law on foreign trade.

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5.1 Relations with customers and suppliers

Starting commercial relations with new customers and / or suppliers and in the management of existing ones, it is forbidden, on the basis of public information and / or available in compliance with current regulations, to establish and maintain relationships with people:

- involved in illegal activities, in particular with those connected to the crimes referred to in Legislative Decree 231/01 and, in any case, with persons lacking the necessary requisites of seriousness and commercial reliability;
- who, even indirectly, behave in a way that does not respect human dignity and individual personality and / or violate the fundamental rights of the person (exploiting child labour, favoring the smuggling of migrants or sex tourism, etc.)
- who do not comply with the laws on labour, with particular attention to child labour, the health and safety regulations of workers and, in general, all the rules contained in this Code of Ethics.
- that do not comply, in general, with the rules contained in this document.

In relations with customers, the company operates in compliance with the laws in force and in compliance with company commercial policies, with correctness and transparency, avoiding any form of conditioning, both internal and external.

In supply relationships Salgomma s.r.l. operates in compliance with the legislation, the principles of this Code and the internal procedures adopted, also in relation to the Quality Management System implemented by the Company.

Employees responsible and employed in the process of purchasing goods and services proceed with the selection of suppliers on the basis of objective criteria (such as the price and quality of products and services) and the management of the related relationships according to criteria of impartiality, transparency and fairness, avoiding situations of conflict of interest, even potential, with the same, reporting to the Company the existence or the onset of such situations.

Any attempt or alteration of normal business relations must also be reported to the Supervisory Body.

Suppliers who work with the Company are prohibited from carrying out any act that is or may be considered contrary to laws and / or regulations in force, and in particular violates the rules of the Code of Ethics, even if such behavior derives or may, even only in the abstract, derive any advantage or interest for the Company.

Furthermore, suppliers are required to avoid any situation of conflict of interest with the same, obliging themselves, in the event of a conflict, to report it immediately to the Company.

These rules are provided for by specific clauses contained in the contracts with collaborators and consultants.

Salgomma s.r.l. pursues the goal of satisfying the best and legitimate expectations of its customers, always treating them fairly and honestly, providing them with quality products and services in compliance with the rules set out to protect competition and the market.

Salgomma s.r.l. therefore it requires from its employees that every relationship and contact with customers is based on honesty, correctness, impartiality, professionalism and transparency.

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Specifically, in relations with customers, it is necessary to:

- apply internal procedures for managing relationships with customers in order to achieve the goal of developing and maintaining favorable and lasting relationships with the customers themselves;
- operate within the framework of current regulations;
- always respect the commitments and obligations undertaken towards customers.

If the Suppliers intend to offer any gifts, this can only be accepted if they are of modest value; if any product or service is received for personal purposes, the employee will be required to pay the related standard market price.

It is not permitted to request and / or accept any credit payments or other types of financial services for personal benefit from suppliers.

5.2 Protection of privacy and confidentiality of personal data

Salgomma s.r.l. undertakes to protect information relating to its staff and third parties, generated or acquired internally and in business relationships, and to avoid any misuse of this information.

Salgomma s.r.l. intends to ensure that the processing of personal data carried out within its structures is carried out in compliance with fundamental rights and freedoms, as well as the dignity of the interested parties, as required by the current regulations, by Legislative Decree 196/03 and subsequent updates

The processing of personal data must take place lawfully and fairly, therefore only data necessary for specific, explicit and legitimate purposes are collected and recorded. Data retention must take place for a period of time not exceeding that necessary for the purposes of collection.

Salgomma s.r.l. it also undertakes to adopt suitable and preventive security measures for all databases in which personal data are collected and stored, in order to avoid the risk of destruction and loss or unauthorized access or unauthorized processing.

All personnel must:

- acquire and process only the data necessary and appropriate for the purposes in direct connection with the functions and responsibilities covered;
- acquire and process the data only within specific procedures and store and archive the data so that it is prevented that others, unauthorized, become aware of it;
- represent and order the data in such a way that any person authorized to access can easily draw a picture as accurate, comprehensive and truthful as possible;
- communicate the data in the context of specific procedures or with the express authorization of superiors and in any case, only after verifying the possibility of disclosing such information, or if necessary, after obtaining the consent of the relevant interested parties.

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6 APPLICATION SCOPE AND VIOLATIONS

The principles and contents of the Code apply to all personnel, to all the activities of Salgomma s.r.l. and to all those who undertake relationships and collaborations with Salgomma s.r.l.

It is primarily the responsibility of the Management and area managers to give substance to the principles and contents of the Code, taking on responsibilities internally and externally and strengthening trust, cohesion and team spirit and, moreover, , represent an example for their collaborators with their behavior and direct them to comply with the Code as well as solicit them to formulate questions and suggestions regarding the individual provisions.

For full compliance with the Code, each person can contact the Management, even directly.

6.1 Supervisory Control Body

The SB is appointed by the Board of Directors and complies with the provisions of the Supervisory Body's regulations.

6.2 Obligation to know the Code and to report possible violations

All Salgomma srl staff, collaborators and suppliers are required to know the principles and contents of the Code as well as the reference procedures that regulate the functions and responsibilities covered.

6.3 Contractual value of the Code

Compliance with the rules of the Code must be considered an essential part of the contractual obligations pursuant to and for the purposes of the applicable law.

The violation of the principles and contents of the Code may constitute a breach of the employment relationship or a disciplinary offense, with all legal consequences also in relation to the preservation of the employment relationship, and lead to compensation for damages deriving from the same.

6.4 Violations

In the event of violations of the Code of Ethics, Salgomma s.r.l. adopts disciplinary measures against those responsible for the violations themselves - where deemed necessary for the protection of corporate interests and compatibly with the provisions of the current regulatory framework and the sanction system envisaged by the 231 model responsible.

Offenses committed by third parties will be sanctioned according to the criteria indicated in the Sanctioning System (drawn up pursuant to Legislative Decree 231/01) and in the specific contractual clauses provided for.

The Company, in verified cases of infringement of the principles of the Code of Ethics which also include details of a crime, reserves the right to take legal action against the persons involved.

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