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COMPANY'S CODE OF ETHICS AND OF CONDUCT



Since 1986 TECNICA GASKET Spa has been manufacturing rubber and plastic items sold worldwide which satisfy technical and quality requirements of several fields of use.

Honesty, transparency, innovation, social and environmental responsibility, together with a good workplace are the key values which the Company is based on. Due to the continuous growth of the business, the Organization deals in a context which is evolving fast.

The aim of this document is to define the commitments and the ethical responsibilities of Tecnica Gasket concerning its internal and external activities where people are involved and which contribute to customers' satisfaction and to the professional growth of its Employees and Partners.

The Code contains fundamental principles to be followed so that the social objectives essential for the reliability and image of Tecnica Gasket can be fulfilled.

All activities, behaviours and relationships inside and outside the Company must be based on these principles.

That is the reason why Tecnica Gasket Spa requires:

- **Respect:** for others and awareness of the importance of multiculturalism and of diversity of the ideas. The Company operates in accordance with the principles of freedom and dignity of each individual. Tecnica Gasket rejects any kind of discrimination, harassment and/or isolation.
- **Leadership** at each level, independently of role and responsibility assignment. The Company encourages to complete skilfully and with awareness the tasks assigned at their best and team work to reach the Company goals.
- Responsibility of the quality, aiming at supplying the best product according to customer's requirements at the lowest price, the whole Organization must be continuously involved to fulfil the more and more demanding qualitative standards required by the market. As a matter of fact, everyone contributes in some way to the final quality of the product and everyone must take his/her responsibilities based on his/her tasks and competencies.
- **Honesty** in performing its own tasks with a honest and equal behaviour. It is demanded to work both as Citizens and Employees in compliance with the rules and the resources given. It is demanded that each task assigned is legitimate, authorized and coherent with the Company procedures. Employees and Individuals who buy goods and/or services including advisory services for Tecnica Gasket must operate following the principles of honesty, cheapness and quality. The choice of the suppliers must be based on objective and documented criterion, aiming at the best price and behaving loyally and impartially, giving equal opportunities to all suppliers.
- Avoiding conflicts of interest in its activities avoiding situations that may imply such a personal involvement that conflicts of interest between personal and business affairs are created. Everyone shall avoid using Company's goods and tools for his/her personal affairs. Benefits or personal gifts shall not be accepted, except for low financial values ones.
- **Confidentiality** in the treatment of all Company data which must be kept and treated guarantying safeguard and protection of customers' data and projects. The safeguard of the professional secret and of any confidential information plays a great role.
- **Business relationships** based on the principles of legality, honesty, transparency and efficiency. Partners shall behave honestly in their business relationships, as well as in the relationships with the Public Administration, regardless of the competitiveness of the market and of the importance of the deal. This is the reason why Employees and Partners are expressly forbidden to make promises or offers, to ask or accept any bribes (such as money, gifts or similar benefits), except for gifts of low financial value.
- **Protection of competition**: Tecnica Gasket commits itself to compete loyally. Its prices are based on customers' requirements without any agreement or collusion with its competitors. Tecnica Gasket aims at establishing equal relationships with its customers and suppliers in compliance with the Competition law.
 - Environmental protection in conducting its business in compliance with statutory laws.
- **Health and safety in the workplace:** Tecnica Gasket commits itself to put in place and keep a safe workplace for each worker since it considers its human resources as the most important asset.



Tecnica Gasket fully complies with the law in force governing health and safety at work and it acts to prevent any accident and professional injures by adopting a safety management system focused on prevention and by promoting a strong culture of workplace safety at each Company level. Machines and tools are constantly improved to enhance safety and to avoid accidents. The same attention is required from its suppliers. The Company provides training and information to each Employee - at each level - to operate in a health and safety workplace. Tecnica Gasket carries out its risk assessment and adopts adequate corrective measures to avoid any hazards for human health and safety. A key role is played by the issue and implementation of emergency and/or evacuation plans. It is forbidden the use and abuse of any psychoactive drug and/or alcohol at work and it is forbidden to smoke on workplace, expect for smoking areas located outside production plants.

- Active job opportunities and equal opportunities by offering every employees the same opportunities in order to guarantee an equal treatment based on credit. The recruitment and choice of the personnel is based on the evaluation of specific competencies, the professional profile and the technical and psycho-aptitude skills of the candidate compared to the job requirements. All pieces of information gotten during recruitment are treated respecting each individual and his/her opinions, without any favouritism.
- **Control and transparency in accounting:** any behaviour that may alter clearness, correctness, transparency and veracity of the accounting records and information must be punished independently from who is responsible. It is forbidden to behave in such a way that compromises the integrity of the company assets.
- **Compliance with the code of ethics**, which is considered an essential part of the contractual duties of every Employee, Manager, Partner, Third Party and anyone who has business relationships with Tecnica Gasket. Any violation of this code of ethics and of conduct may be considered as a breach of the contractual obligations and may lead to legal consequences like termination of the contract and the reimbursement of the related damages.

In the business relationships with its Suppliers Tecnica Gasket bases its choice on the objective evaluation of quality, cheapness and promptness of the supply. With a view toward achieving the highest level of customer satisfaction at all times in terms of quality, costs and delivery time, Tecnica Gasket commits itself, in accordance with its procedures, to give each Supplier, which has the abovementioned requirements, the opportunity to compete and to develop open and profitable long-term relationship aimed at mutual profit and continuous improvement.

In the business relationships with its Customers Tecnica Gasket aims at its own success by offering quality and competitive products in compliance with the antitrust laws. This is the reason why the Company commits itself, in accordance with its procedures, to supply the Customer products which fully meet or exceed the even more and more demanding requirements and, pursuant to the contract requirements, adding quality technical information which must be clear and accurate.

Paratico, 28-04-2018

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