

CODE OF ETHICS

pursuant to Italian Leg. Decree 231/2001



CODE OF ETHICS**TABLE OF CONTENTS****INTRODUCTION****1. GENERAL PRINCIPLES**

- 1.1. Recipients
- 1.2. Duties of UNIGASKET S.r.l.
- 1.3. Recipients' obligations
- 1.4. Supervisory Body
- 1.5. Efficacy of the Code and consequences of its violations

2. ETHICAL PRINCIPLES**3. RELATIONSHIPS WITH THIRD PARTIES**

- 3.1. Relationships with non-employees
- 3.2. Relationships with customers and suppliers
- 3.3. Relationships with the Public Administration, with public Agencies and/or pertaining to relationships of a public nature
- 3.4. Relationships with Public Supervisory Authorities and other regulatory bodies
- 3.5. Relationships with political or trade union organisations
- 3.6. Relationships with mass media
- 3.7. *Non-profit* initiatives

4. CORPORATE GOVERNANCE. TRANSPARENCY OF ACCOUNTING RECORDS AND INTERNAL CHECKS. ANTI-MONEY LAUNDERING

- 4.1. Corporate governance
- 4.2. Accounting records and corporate entries
- 4.3. Internal checks
- 4.4. Anti-money laundering

CODE OF ETHICS**5. PERSONNEL POLICIES AND WORK ENVIRONMENT**

- 5.1. Human resources
- 5.2. Harassment in the workplace
- 5.3. Smoking, alcohol and drugs

6. SAFETY AND ENVIRONMENTAL PROTECTION**7. CONFIDENTIAL INFORMATION AND PRIVACY PROTECTION**

- 7.1. Confidential information and privacy protection
- 7.2. Insider Trading

CODE OF ETHICS**INTRODUCTION**

The main company presentation data is provided here below:

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| Company Name | UNIGASKET S.r.l. |
| Year of incorporation | 2 October 1987 |
| Business sector | Production of tapes, bare hoses and braided hoses made of PTFE Silicone hoses and profiles, thermoplastic hoses |
| Tax Code and VAT no. | 01804760161 |
| R.E.A. (Economic and administrative list) of Bergamo | BG 238520 |
| Accounting period closing date | 31 December of each year |

COMPANY MISSION AND POLICY

UNIGASKET S.r.l. is a dynamic and versatile Italian company with twenty years of experience in the sector of PTFE PASTE EXTRUSION. Originally a producer of PTFE tapes, it has evolved while adapting to the needs of the market, so that it is now able to offer a complete range of products in this sector. The processing methods, the long-standing experience and the technologically advanced equipment ensure products with high technical quality as well as competitive costs and times. Our Customers belong to various industrial sectors and our production, though standardised in compliance with legal requirements and available through catalogue, is typically carried out based on the Customer's work-order, although in recent years customer needs have modified in part the stock management, up to the introduction in only a some cases of Kanban warehouse management.

UNIGASKET's product range includes the following items:

- PTFE tapes for industrial and electrical use
- PTFE hoses smooth and corrugated
- PTFE flexible hoses for high pressures braided stainless steel
- PTFE gaskets and extruded
- Flangiflon PTFE universal thread sealing tape

CODE OF ETHICS

- Hoses and extruded profiles made of silicone
- Thermoplastic hoses
- Rubber seals for automotive sector

The customers expect our products to have precise dimensions (according to specifications), to be free of processing defects and to perform as expected once they are installed. In order to achieve this, it is not enough to select the right starting materials, as these must be treated and processed according to pre-established technical rules, following a process during which all **UNIGASKET** personnel contribute to meeting the customer's requirements and expectations.

CODE OF ETHICS**1. GENERAL PRINCIPLES****1.1. Recipients**

The rules contained in this Code apply to each director, executive, employee, non-employee (including, for example purposes, consultants, brokers, suppliers, etc.) and anyone who enter into a contractual relationships with the company in their routine business and in the pursuit of their own goals (hereinafter also referred to as the “Recipient”, if considered individually, or the “Recipients” if considered collectively).

When defining the company’s general guidelines and objectives and when taking any decision or action pertaining to its management and activities, as well as when suggesting investments, transactions or projects, the C.E.O. is required to draw from the principles of this Code as well as from the principles of legality, honesty and transparency. Likewise, when tangibly implementing the company’s management activity, the directors shall draw from the same principles, both internally and vis-à-vis any third parties with which UNIGASKET S.r.l. comes in contact.

Company employees and non-employees, as well as business partners and all those which entertain long-term commercial relations with the company, are required to ensure that their behaviour complies with the provisions of this Code.

Each employee and non-employee shall be required to carry out their tasks with honesty, commitment and professional rigour, and shall operate within the law.

The criteria of fairness, collaboration, honesty and mutual respect shall define the relationships among all employees, at all levels, and among the latter and third parties which are not part of the company.

The actions, transactions, negotiations and, generally speaking, any other activity carried out by UNIGASKET’s employees during performance of their work activity shall comply with the principles of managerial fairness, transparency and completeness of information as well as of compliance, legality and observance of internal procedures.

1.2. Duties of UNIGASKET S.r.l.

The company ensures, within its organisation:

- the widest distribution of the Code to the directors, executives, employees and non-employees of its subsidiaries;
- the distribution of knowledge, training and explanatory tools concerning the contents and interpretation of the Code;
- the update of the Code;
- the performance of checks, subject to notification, in case of violations of the Code.

CODE OF ETHICS**1.3. Recipients' obligations**

All Recipients must be familiar with the rules contained in this Code, and are required to:

- refrain from undertaking behaviours or initiatives the nature of which is contrary to the provisions contained in the Code;
- report to their superiors, if any, and in any event to the Company's Supervisory Body (with which a constant flow of information must be established) any new piece of information concerning violations of the Code within the organisation.

Vis-à-vis any third parties which entertain a relationship with the company, each Recipient shall be required to:

- duly inform them with regards to the provisions contained in this Code;
- demand compliance with the provisions of the Code while performing activities for which they have entertained the relationship with the company;
- adopt the initiatives contained herein in case of failure by the third parties to comply with the obligation to conform to the provisions contained in the Code.

1.4. Supervisory Body

Pursuant to art. 6, paragraph 4, of Italian Legislative Decree 231/2001, the duties and functions of the company's Supervisory Body are assigned to a monocratic body appointed by the Board of Directors, ensuring (and being ensured of) the constant flow of information that may be necessary for the purpose of performing the supervisory tasks more specifically described *infra*.

The Supervisory Body – also with the collaboration and support of external professionals who will be able to conduct checks of a technical nature – arranges for:

- supervising observance of the Code, through a procedure of constant information flow involving all company levels, analysing information about any possible violations of said Code and planning, subject to notification, any additional checks as may be necessary;
- disclosing and verifying knowledge of the Code through activities aimed at a better understanding of its contents;

1.5. Efficacy of the Code and consequences of its violations

Observance of the rules contained in this Code must be viewed as a basic part of the contractual obligations to be undertaken by company employees, pursuant to article 2104 of the Italian Civil Code, as well as by any non-employees who collaborate with the company.

CODE OF ETHICS

Moreover, the adoption by employees of conduct which disregards the aforementioned rules constitutes a breach of the employees' obligation to carry out their assigned tasks with due diligence, becoming personally responsible for them.

In connection with the sanctions that can be inflicted, please note that they will be applied according to the provisions contained in the company's Organisation, Management and Control Model, in compliance with the contents of the company disciplinary system and with the procedures provided for by the applicable National Collective Labour Agreement (CCNL) and by art. 7 of the Workers' Statute.

Sanctions shall be inflicted consistently, impartially and evenly, and shall be proportioned to the respective violations of the Code, depending on their seriousness, and shall comply with the provisions in force on the subject of regulations on employer-employee relationships.

2. ETHICAL PRINCIPLES

In order to achieve its objectives, the company draws from the following principles, which are also part of the existing management system Policy:

- compliance with all legal and regulatory provisions in force in the areas where the company operates;
- observance of the strictest rules of behaviour in relationships with third parties and, in particular, with the Public Administration (understood to be the widest meaning of the term and also referred to below as "Administration and Public Agencies"), in full compliance with institutional functions;
- familiarity with legal and regulatory provisions concerning the prevention of culpable offences (*Manslaughter or serious or very serious injuries committed in breach of applicable regulations on health and safety at work*) through training activities;
- clarity and truthfulness in all documents generated while performing the activities;
- compliance with obligations vis-à-vis the Cultural and Environmental Heritage, for the preservation and improvement of Social Well-being;
- professionalism, honesty, fairness, good faith, honesty, transparency and reliability;
- confidentiality with regards to all collected information and compliance with privacy regulations;
- compliance with regulations and with company protocols concerning the use of IT tools, with special reference: (i) to the prohibition to install unauthorised software or software aimed at intercepting, falsifying, altering or suppressing the content of computerised documents and/or communications; (ii) to the use of software programs authorised only for environments pertaining to the work activity, only for the purposes allowed by the law (and in compliance with it) and by company subsidiaries, in compliance with the privacy policy;
- respect, equality and impartiality vis-à-vis customers, employees and non-employees, and stakeholders in general;

CODE OF ETHICS

- respect for and safeguarding of environment, health and safety, also in connection with workplace health and safety;
- safeguarding the integrity of the image of both the company and its shareholders;
- refusing to compromise when it comes to Product Safety;
- being fully aware that all information pertaining customers, suppliers and technology are exclusive property of the company and cannot be disclosed;

(hereinafter, the “Principles”).

Each Recipient is required to comply with the Principles. UNIGASKET shall not initiate or continue any relationship with individuals or organisations which, including in a tacit manner or with conclusive evidence, show their intention to disregard the Principles.

While performing their work duties, each director, executive and employee shall be required to refrain from carrying out activities which are not aimed at the interest of the company or which may represent a conflict of interest with it.

This prohibition does not apply to shareholdings held by the directors as of the approval date of this document.

In any event, it is understood that under no circumstances shall the belief of acting to the advantage or in the interest of UNIGASKET justify, not even in part, behaviours which are in contrast with the principles and contents of this Code.

For example purposes only and without any limitation, the following constitute a conflict of interest:

- the profit-sharing – blatant or hidden – of directors, executives, employees or of their family members (up to second-degree relatives) in companies owned by suppliers, customers and competitors;
- the exploitation of their functional role for the pursuit of interests which are in conflict with those of UNIGASKET;
- the use of information acquired during the performance of work activity to one’s own advantage or the advantage of third parties, and in any event in contrast with company interests;
- the performance of work activities of any type (manual or intellectual) at customer, supplier and competitor facilities and/or at third parties, which are in contrast with UNIGASKET’s interest;

CODE OF ETHICS

- the conclusion, completion or start of negotiations and/or contracts referable to the company and in which the counterparts are relatives or partners of any company director, executive, employee or legal persons of which they may be owners or, in any event, in which they have a shareholding.

Outside business hours and premises, each director, executive and employee shall be able to perform, in total freedom, all activities allowed by law and compatible with the responsibilities undertaken in the capacity of director, executive and employee of the company.

3. RELATIONSHIPS WITH THIRD PARTIES**3.1 Relationships with non-employees**

All directors, executives, employees, in connection with their own functions, shall:

- strictly comply with internal procedures pertaining to the selection and management of relationships with non-employees;
- carefully select qualified individuals and companies with a good reputation;
- promptly report to the Supervisory Body of their company, with the outcome of the initial immediate investigations, with regards to any violations of the Code by non-employees;
- expressly mention, in all contracts entered into with non-employees, the obligation to comply with the Principles set out in the Code, under penalty of contract cancellation.

Non-employees are required to comply with the Principles contained in the Code.

3.2. Relationships with customers and suppliers

The directors, executives and employees of UNIGASKET are required to:

- follow the provisions contained in the Code;
- strictly comply with internal procedures on managing relationships with customers and suppliers;
- provide correct, truthful and comprehensive information about the company's activities, so that customers and suppliers can make informed decisions;
- comply with truth and transparency in all kinds of communications.

In contracting, purchasing or procurement relationships and, generally speaking, the supply of goods and services, the directors, executives and employees of UNIGASKET are required to comply with the

CODE OF ETHICS

principles set out in this Code, as well as with internal procedures, using the written form. In any event, the selection shall be made in compliance with the requirements of professionalism, quality, price, convenience, ability and efficiency.

In particular, the company directors, executives and employees are required to:

- strictly comply with the regulations in force and with internal procedures concerning the selection of and management of relationships with suppliers and public and/or private customers;
- refrain from denying anyone in possession of the requisites the possibility to compete in the selection;
- when selecting suppliers in possession of the requisites, adopt objective evaluation criteria according to stated and transparent methods;
- obtain the suppliers' cooperation in meeting the needs of customers in terms of quality and convenience;
- during the supply relationships, observe and comply with the applicable legal provisions and the contractual terms and conditions;
- draw from the principles of fairness and good faith when corresponding with and talking to suppliers and customers, in line with the strictest commercial practices.

The remuneration to be paid to customers and suppliers shall be exclusively commensurate with the activity covered by the contract, and under no circumstances shall payments be made to a subject other than the contractual counterpart.

Directors, executives and/or employees shall not be entitled to:

- receive any form of compensation from anyone for the performance of their official duties or any act performed in conflict with their official duties;
- give or receive, under any form, either direct or indirect, gifts and gratuities, unless said gifts or gratuities are of modest value, of common use and such as to not jeopardize the company image;
- be influenced by third parties extraneous to the company as regards the taking of decisions and/or the execution of acts pertaining to their own work activity.

Should the director, executive and/or employee receive gratuities or other forms of benefits, not directly ascribable to regular courtesy, they shall be required to refuse said gratuity or other form of benefit, and promptly inform the Supervisory Body of their company.

CODE OF ETHICS**3.3. Relationships with the Public Administration, with public Agencies and/or pertaining to relationships of a public nature**

The company's relationships – through its directors, executives, employees and/or non-employees assigned and authorised to entertain said relationships – with Public Administrations and/or Agencies or, in any event, pertaining to relationships of a public nature, must be based on the strictest observance of applicable legal and regulatory provision, and shall under no circumstances jeopardize UNIGASKET's integrity and reputation.

While carrying on relationship with the Public Administration and/or with Public Agencies, the Recipients are required to adopt a behaviour characterised by fairness, transparency and traceability.

In particular, during relationships with the Public Administration and/or Public Agencies, or relationships pertaining to relations of a public nature, the Recipients must absolutely refrain from undertaking conducts that may constitute an alleged offence pursuant to Italian Legislative Decree 231/2001. Hence, practices such as corruption, illegal favours, collusive conducts, solicitations (direct and/or through third parties) of personal and career advantages for oneself or for others, shall be punished with no exception.

The taking on of commitments and the management of all sorts of relationships with Public Administrations and/or Agencies are exclusively reserved to the company functions and/or non-employees assigned and authorised to do so.

During relationships with Public Administrations and/or Agencies, the Recipients must not attempt to unduly influence the decisions of the institution concerned.

In any event, during the course of business negotiations or of a relationship, including of a commercial nature, with Public Administrations and/or Agencies, the Recipients agree to refrain from:

- offering employment and/or commercial opportunities in favour of personnel of the Public Administration and/or Agency involved in the negotiations or in the relationship, or to their relatives;
- offering gratuities, except for acts of commercial courtesy of modest value;
- soliciting or obtaining confidential information that jeopardizes the integrity or the reputation of UNIGASKET.

During relationships with Public Administrations and/or Agencies, the Recipients assigned to said relationships are not allowed to pay or offer, directly or through third parties, sums of money or gifts of any type and entity, be they public officials, government representatives and/or representatives of Public and local Agencies or institutions, public employees and private citizens, be they Italian or of

CODE OF ETHICS

other nationality, with which the company entertains commercial relationships, in order to remunerate or repay them for their official duties or to attain the execution of an act which is in conflict with their official duties.

Acts of commercial courtesy, such as gifts or forms of hospitality, or any other form of benefit (including donations), are allowed only if they are of modest value and such as to not jeopardize the integrity and reputation of the parties and to not be interpreted, by an impartial third-party observer, as acts intended to obtain advantages and favours inappropriately. In any event, these acts must always be authorised and duly documented.

3.4 Relationships with Public Supervisory Authorities and other regulatory bodies

The company agrees to fully and strictly observe the rules set by all Public Supervisory Authority for compliance with the regulations in force in the sectors associated with its business (for example, the Supervisory Authority for Public Work, Service, and Supply Contracts, the Personal Data Protection Authority, the Market and Competition Authority, CONSOB, Prefectures, etc.).

The Recipients are required to comply with all requests submitted by any one of the aforementioned Authorities and by the other regulatory bodies, cooperating in the relative inquiry procedures, behaving, in this area, in a manner characterised by fairness, transparency and traceability. Hence, the Recipients are prohibited from making, inducing or encouraging false declarations to the aforementioned Authorities.

3.5. Relationships with political or trade union organisations

The company does not make any contribution of any kind, directly or indirectly, to political parties, movements, committees and political and trade union organisations, or to their representatives or candidates, except for contributions which are owed on the basis of specific regulations.

These contributions shall be disbursed in a manner that strictly complies with the law and with the provisions in force, and duly documented.

Moreover, the company does not make any contributions to organisations with which there may be a conflict of interest (for example, environmental or consumer protection associations).

3.6. Relationships with the media

Generally speaking, relationships between the company and the *mass media* are exclusively assigned to company functions and managers authorised to do so, and must be entertained in compliance with the communication policy defined by Top Management.

CODE OF ETHICS

In any event, all information and communications pertaining to the company and its activities, intended to be shared outside the company, must be accurate, truthful, transparent and complete.

The participation of the company directors, executives and/or employees, in the name of the company (or of one of its subsidiaries) or in its representation, in committees and associations of any sort, be they scientific, cultural, or trade-specific, must be regularly authorised.

The Recipients who are invited in the name of the company (or of one of its subsidiaries) or in its representation, to attend conferences, conventions or workshops, or to draft articles, essays or publications in general, are required to obtain prior authorisation of their direct Supervisor as regards the texts, the reports and any other document that may be written for this purpose.

3.7 Non-profit initiatives

UNIGASKET encourages *non-profit* activities for the purpose of confirming its commitment to take action for the satisfaction of common interests worthy of appreciation, from an ethical, legal, environmental and social standpoint, of the communities where it operates.

The Recipients, in line with their functions, are required to take active part in defining the aforementioned activities, in tune and in compliance with society's intervention policies, and to implement said activities in compliance with the criteria of transparency and honesty.

Therefore, in compliance with the company's Principles, contributions may be made to non-profit associations with proper by-laws and deeds of incorporation having social relevance at the local, domestic and international level.

The sponsorships, which may concern social issues, sports, show-business, the arts, culture and the environment, are intended only for events offering a quality guarantee.

In any event, when choosing from the various options, the company has to be careful to avoid any possible conflict of interest of a personal or corporate nature.

4. CORPORATE GOVERNANCE. TRANSPARENCY OF ACCOUNTING RECORDS AND INTERNAL CHECKS. ANTI-MONEY LAUNDERING.

4.1. Corporate Governance

When managing the companies, the principles of corporate governance best suited to ensuring the highest level of transparency and the best execution of the activities in compliance with good corporate government rules and with the provisions of the Code must be observed when managing the subsidiaries, in the interest of the partners, employees, non-employees and all those who entertain

CODE OF ETHICS

business relationships with the company.

4.2. Accounting records and corporate entries

The individuals involved in the drafting and preparation of all accounting documents and corporate entries must adopt behaviours based on the utmost propriety; hence, all operations or transactions must be correctly recorded in the books according to criteria specified by the law and by applicable accounting standards. All corporate entries and accounting records must be clear, truthful, complete and accurate, as well as verifiable, legitimate and consistent. So that the accounting records meet the requirements of truth, completeness and transparency of the recorded data, adequate and complete back-up documentation of the activity carried out must be retained in company files, so as to allow:

- proper recording in the books;
- immediate determination of the characteristics and reasons underlying the same transaction;
- easy formal and chronological reconstruction of the transaction, also for the purpose of reducing the probability of mistakes, even material and interpretative;
- a verification of the decision-making, authorisation and realisation process, as well as the identification of the various levels of responsibility and of distribution and separation of duties.

Each accounting record shall reflect exactly that which is shown by the backup documentation. Consequently, it will be the duty of each director, executive, employee or non-employee assigned to do to make sure that the backup documentation is easy to find and filed according to logical criteria.

4.3. Internal checks

By “internal checks” we mean all the tools necessary or useful for guiding, managing and verifying the organisation’s activities for the purpose of ensuring compliance with the laws and with company procedures, protecting corporate assets and providing clear, truthful and correct information on the company’s capital, economic and financial situation.

CODE OF ETHICS

It is the organisation's duty to spread, at all levels, the awareness of the need for checks and a culture oriented towards the exercise of these checks.

Within the scope of their functions and competencies, the company directors and executives shall be required to participate in the development and implementation of an effective company control system and to get their subordinates to take part in this system.

The company directors, executives and employees are therefore required, insofar as it pertains to them, to:

- arrange for the definition and proper operation of the control system;
- keep the company assets in a responsible manner, be they tangible or intangible assets or instrumental for the activity carried out, and refrain from using them improperly.

4.4. Anti- money laundering

UNIGASKET is committed to complying with all rules and provisions, both domestic and international, on the topic of anti-money laundering.

No company director, executive, employee and/or non-employee consultant shall, in any way and under any circumstance, be implied in affairs pertaining to the laundering of money originating from illegal or criminal activities.

Prior to entering into relationships or drawing up contracts with permanent suppliers and other *partners* in long-term business relations, the company, its employees and/or non-employee consultants shall be required to verify the moral integrity, reputation and good standing of the counterpart.

5. PERSONNEL POLICIES AND WORK ENVIRONMENT

5.1. Human resources

Human resources are considered a crucial element for the existence and future growth of UNIGASKET. So that the skills and abilities of each employee may be exploited to the fullest and each employee may express their potential, the competent company functions shall be required to:

- apply merit and professional competence criteria when making any decisions involving employees;
- select, hire, train, remunerate and manage employees with no discrimination whatsoever, arranging so that all employees can receive fair and equal treatment, regardless of their gender, age, nationality, religion, ethnic origin;

CODE OF ETHICS

- guarantee each employee equal opportunities in connection with all aspects of the employment relationship with the company, including, for example purposes only, professional acknowledgements, salaries/wages, professional refresher and training courses, etc. arranging so that all employee can enjoy fair regulatory and wage treatment, with no discrimination whatsoever.

The employees must be familiar with the Code and with the behaviour prescribed by it. To this end, UNIGASKET is committed to enhancing the awareness of all employees as to problems pertaining to the contents of the Code.

The company is committed to safeguarding the psychological and physical integrity of its employees, respecting their personality and preventing them from being subjected to conditioning or distress. To this purpose, the Organisation's Top Management shall step in to prevent injurious or defamatory interpersonal attitudes and, in order to safeguard its image, shall reserve itself the right to consider relevant any behaviours outside regular work hours that, due to their resonance, are deemed offensive to the mores of civil society.

Moreover, in connection with the indications contained in art. 2087 of the Italian Civil Code, the company is required to adopt measures, while performing its activities, that, according to the particular nature of the job, the experience and the technique, are necessary for the purpose of safeguarding the workers' physical integrity and moral personality.

Hence, the employees shall be required to contribute to maintaining a company climate of mutual respect, and to refrain from behaving in a way that may harm the dignity, honour and reputation of each employee.

5.2. Harassment in the workplace

UNIGASKET wants to avoid all kinds of harassment during internal and external work relationships, the creation of a hostile work environment towards one or more workers or the occurrence of sexual harassment, meaning as such the possibility of professional growth or other advantage being conditional upon the rendering of sexual favours or upon proposals of private interpersonal relationships that, due to the fact of being unwanted by the recipient, may upset them.

In any event, behaviours that constitute physical or psychological violence are prohibited with no exception allowed.

Attitudes however ascribable to mobbing practices are prohibited. For example purposes only and without limitation, said behaviour can be considered as being aimed at: creating a work environment

CODE OF ETHICS

that is intimidating, hostile, of isolation or in any event discriminatory towards individual workers or groups of workers; creating unjustified interference in the execution of jobs carried out by others; hindering other people's employment opportunities for mere reasons of personal competition or competition of other employees.

5.3 Smoking, alcohol and drugs

UNIGASKET has also applied the regulations on the subject of health and safety of its employees through the adoption of no smoking provisions contained in art. 51 of Italian Law no. 3 of 16 January 2003.

The company believes that being under the influence of alcoholic substances or narcotics while carrying out one's job and in the workplace is prejudicial to the work environment.

6. SAFETY AND ENVIRONMENTAL PROTECTION

UNIGASKET is committed to contributing to the development and well-being of the environment where it operates and, in this sphere, the company ensures its directors, executives, employees and other associates, such as non-employees, contractors' employees, visitors and anyone who may access the areas under the legal responsibility of the company's Employer, the preservation of a healthy, safe, clean and sanitary, so as to avoid the possibility of accidents and/or injuries in the workplace. Therefore, when managing its activities, UNIGASKET complies at all times with the regulations in force on the subject of health and safety, prevention and protection in workplaces (Italian Leg. Decree 81/2008), as well as with environmental protection regulations, and considers these aspects primary objectives of the company management.

The company directors, executives and employees, within the scope of their functions, shall be required to actively participate in the risk prevention and health and safety protection process, pursuant to the regulations in force. In this sphere, said individuals are required to actively contribute to maintaining an optimal health and safety protection standard, refraining from unlawful or, in any event, dangerous behaviour and reporting to their superior or to the body of which they are a member and to the competent organisation with regards to any third-party behaviour which violates health and safety protection rules.

In particular, the company has implemented a Quality Management System for the purpose of equipping itself of organisational and procedural tools for monitoring the Environment and Safety aspects, among others; the company has therefore adopted a management system that consists of

CODE OF ETHICS

procedures and instructions which contain the operational methods for environmental, health and safety protection, as well as for compliance with the regulations in force on the subject.

Respect for the environment and for the workers' health and safety are primary company objectives, and as such are subject to constant monitoring and periodical review.

Through its management system policy and its safety policy described in the Risk Assessment Document, UNIGASKET expresses its fundamental principles and criteria based on which decisions are taken, of all types and at all levels, on the subject of workplace health and safety.

These principles and criteria, also in reference to article 15 of Italian Legislative Decree 81/08, can be identified as follows:

- a. avoid risks;
- b. assess those risks which cannot be avoided;
- c. fight risks at the source;
- d. adapt the work to man, in particular with regards to the design of workstations and the choice of work equipment and work and production methods, especially in order to reduce monotonous and repetitive jobs and cut down on the effects which these jobs can have on the workers' health;
- e. take into account the degree of evolution of the technique;
- f. replace that which is dangerous with that which is not or is less dangerous;
- g. plan the prevention, aiming at a consistent set that incorporates in said prevention the technique, the work organisation, the work conditions, social relations and the impact of work environment factors;
- h. give top priority to collective prevention measures with respect to individual protection measures;
- i. impart appropriate instructions to the workers.

These principles are the organisation's point of reference in order to take the measures needed to protect the workers' health and safety, including the occupational risks prevention activities, information and training activities, as well as the setting up of an organisation and the necessary resources.

At both top management and operational levels, the company must comply with these principles, in particular when decisions need to be taken or choices need to be made and, afterwards, when said decisions or choices must be implemented (see art. 6, paragraph 2, letter b), of Italian Leg. Decree 231/2001).

CODE OF ETHICS**7. CONFIDENTIAL INFORMATION AND PRIVACY PROTECTION - INSIDER TRADING****7.1 Confidential information and privacy protection**

The company's activities constantly require the acquisition, retention, processing, communication and distribution of data, documents and information pertaining to negotiations, proceedings, transactions and contracts to which UNIGASKET is a party.

Moreover, the company's databases may contain personal data protected by privacy regulations, data which cannot be made known outside the company and, lastly, data the disclosure of which may damage the organisation itself.

Consequently, each employee is required to safeguard the confidentiality of the information acquired due to their work function, and hence shall not use, communicate or disclose said information without the prior specific authorisation by their superior.

Each employee shall therefore be required, including in compliance with the contents of the respective letters of appointment in the capacity of Person in charge of the processing, to:

- acquire and process, in a lawful manner and pursuant to Italian Leg. Decree 196/2003, only the data necessary and directly associated with their functions;
- retain this data in a manner such as to prevent third parties from gaining knowledge of it, conforming to the provisions contained in Italian Leg. Decree 196/2003, including on the topic of sensitive and/or legal data processing using electronic means;
- communicate and disclose the data within the scope of the procedures defined in advance by the company or subject to authorisation of the person authorised to do so;
- determine the confidential nature of the information pursuant to contents of the procedures defined in advance by the company;
- ensure that there are no confidentiality clauses pursuant to relationships of any nature with third parties.

UNIGASKET, on its part, undertakes to protect information and data pertaining to its employees and third parties, and to prevent any improper use of said data and information.

CODE OF ETHICS

Moreover, the procedures and protocols adopted for the purpose of protecting the privacy must also be complied with (particularly with regards to passwords) in relation to the use of IT tools, the Internet and electronic mail.

7.2 Insider trading

All company directors, executives, employees and non-employees shall be required to comply with both domestic and international rules on the subject of insider trading. Consequently, no director, executive, employee or non-employee shall be entitled to benefit in any way, either directly or indirectly, either through personal or capital advantages, from the use of information protected in accordance with the aforementioned regulations, where said information is not in the public domain.