

CODE OF ETHICS

of SINTESY S.R.L.

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1. Introduction

SINTESY S.R.L. (hereinafter also SINTESY or the Company) is a leader in real-time monitoring, data recording and alarm systems used in Biobanks, Cryobanks, Laboratories, Research Centers and Medical Gas Pipeline Systems.

2. Code of Ethics

In this Code of Ethics, SINTESY reiterates its adherence to the highest ethical standards it believes and recognizes. This Code of Ethics (hereinafter even the Code) has been prepared in accordance with the relevant regulations applicable to SINTESY, national and international guidelines and documents related to human rights, corporate social responsibility and corporate governance.

The adoption of this Code is intended to meet the needs and expectations of all the internal and external stakeholders of SINTESY (employees, shareholders, customers, suppliers, government, etc.), in order to constitute a framework transparent and oriented to the compliance with ethical and behavioral standards, distinguished by a style characterized by excellence and reliability.

This Code contains, inspired by the Italian Legislative Decree no. 231 of 2001, the rules of conduct that SINTESY places at the base of its business conduct. In particular, through the Code of Ethics are represented the standards of behavior that employees are obliged to respect and enforce.

3. General principles

The rules of conduct of this Code of Ethics shall implement and be guided by the following principles:

Centrality of the person

the respect for human dignity is the cornerstone of action of each company manager. For this reason SINTESY undertakes to ensure working conditions that protect the safety, health and human dignity. The goal is to enable all members of SINTESY to work with pride, positivity, dedication, growth, creativity and motivation.

Fairness and impartiality

in any relations with its stakeholders SINTESY avoids any form of discrimination based on gender, sexual orientation, age, nationality, health status, political opinions, race and religious beliefs, and in general to any characteristic of the human person.

Loyalty and transparency

SINTESY recognizes the value related to the communication of correct, complete and transparent information both internally and externally. The aim is to ensure sound management and build honest, loyal, lasting and based on trust and credibility relations with its stakeholders.

Quality and customer satisfaction

SINTESY is committed to ensure compliance with the highest quality standards of products and processes, and to ensure that products and services meet the needs and expectations of the customer, through a management based on experience, quality, performance and availability of a wide range of products, together with the measurement of customer satisfaction.

The mission of SINTESY is to be a reliable partner able to meet different production issues. SINTESY considers of utmost importance that the expectations of its customers are systematically defined and translated into requirements that are properly and promptly met. SINTESY guarantees the completeness of technological support and expertise in the various fields of application. The technical and commercial staff is able to offer a complete assistance service and constant monitoring on production cycles, for the identification of suitable products and application systems, the implementation of appropriate optimization plans and training courses for the staff.

Excellence, experience, innovation

SINTESY uses know-how, methods and/or production technology based on years of experience and continuous investment in research and development, designing cutting edge products in his field. SINTESY work closely with researchers, research laboratories and universities to offer to the users of its products and innovative solutions increasingly efficient and economical, in a context of improving quality of the final product.

SINTESY has its own laboratories for research and development and quality control at the production plants at Carugate, Milan, Italy.

In addition to constant control of components used for the realization of its products and the continuous monitoring of their quality, the laboratories of R&D develop and test constantly new products to meet the different application needs.

4. Rules of Ethics

This section outlines the standards of behavior for all SINTESY stakeholders in order to comply with the values of the Company.

4.1 Employees and partners

The term employees refers to:

- a) employees of the Company, even if abroad;
- b) those who perform, also de facto, administration, management or control in the Company or its own independent organizational unit;
- c) those who work with the company under a temporary, or semi-subordinate employment;
- d) those who, although not belonging to the staff of the Company, act in the name and/or on behalf of SINTESY and/or in its interest pursuant to a warrant, other contractual relations of cooperation, transfer of duties or powers and/or other agreements (such as, for example, promoters, brokers, agents or consultants, joint venture partners or partners in business project, etc.).

Ethical and transparent conduct

Employees of SINTESY and partners whose actions may somehow be related to the Company, should behave in a correct manner, diligent and consistent with the provisions of the law in their activities with SINTESY. Moral integrity is a constant duty for all those who work for SINTESY and characterizes the conduct of its entire organization. Ethical conduct, honesty and transparency comprises first of all an appropriate behavior in the work place, in personal relationships and professional ones. The relations between employees, at all levels, must be based on the principles of honesty, collaboration, loyalty and mutual respect. Ethical conduct includes compliance with all applicable laws, regulations and procedures applicable to the conduct of the office and of this Code of Ethics. Each employee is committed to the respect of laws and regulations of the country in which it operates. SINTESY works to ensure that employees have knowledge of legal requirements related to their function, allowing them to recognize the risks and understand the approach to be taken in situations of risk.

Employees and persons effecting any purchase of goods and/or services, including also external consultants, on behalf of SINTESY, must act in accordance with the principles of fairness, affordability, quality and lawfulness and operate with "due diligence of a good family man".

The computer instrumentation of SINTESY must be used in strict compliance with applicable laws and specific procedures.

Foreign workers

It is forbidden to employ third country nationals staying illegally.

SINTESY is committed, in compliance with applicable regulatory requirements relating to immigration, not to establish any working relationship with persons without residence permits and never engage in any activity likely to encourage the illegal entry of persons. SINTESY encourages as well the learning of Italian language.

Minors

SINTESY guarantees the protection of minors and gives the greatest importance to the prosecution of exploitative behavior of any kind.

SINTESY does not employ minors or participates or has dealings with companies which SINTESY has knowledge that not safeguard the respect of the individual personality.

It's also forbidden and entirely alien to SINTESY and his collaborators any improper use of the company information technology tools, aiming to put in place or even possible to facilitate the offense conduct relating to child pornography, even by virtual images.

Respect for democratic values and fight against organized crime

SINTESY recognizes the primary value of the principles of democratic order and free political determination which underpin the Italian State. Therefore it is forbidden and entirely alien to SINTESY any behavior that could constitute or be related to terrorist activity or subversion of democracy.

SINTESY expects that its employees do not perform such acts or conduct that may facilitate the commission of the offenses introduced by the New York Convention of 09/12/1999 for the suppression of the financing domestically and internationally of terrorism.

SINTESY recognizes the primary importance of any action aimed to prevent the use of the financial system for the purpose of laundering the proceeds of criminal activity and terrorist financing.

SINTESY recognizes the primary value of the principles of the fight against organized crime. Any behavior that could constitute or be connected to organized or mafia-type criminal activities it is forbidden and entirely alien to the values of SINTESY.

Each employee must report any behavior or situation which threatens the economic or commercial freedom of SINTESY. In particular, they must report all situations of threat, extortion, blackmail, limiting the activities of SINTESY for the benefit of other companies or people linked to national or international criminal organizations.

Protection of diversity

SINTESY offers all employees the same work opportunities to ensure a fair treatment based on merit and on the values of equality, tolerance and mutual respect.

The competent departments shall:

- a) adopt criteria of merit, competence and strictly professional criteria for any decision concerning an employee;
- b) select, hire, train, pay and manage employees without any discrimination of sex, race, age, religion, nationality, political or trade union affiliation;
- c) create a working environment in which personal characteristics are not a source of discrimination;
- d) create a working environment of dignity and respect, in which each individual has the opportunity to contribute better to the development and growth of the company with their potential and characteristics.

SINTESY expects that employees at any level, cooperate in maintaining a climate of mutual respect for the dignity, honor and reputation of each other.

SINTESY will intervene to prevent disrespectful or abusive attitudes and interpersonal behavior.

Representativeness

SINTESY's reputation is an intangible asset of great value, which permit the creation and development of trustful relationships with all the stakeholders.

All activities must be carried out with the utmost care and professionalism, each employee must provide adequate skills and expertise to the task assigned and must act to protect the reputation of SINTESY.

The following circumstances occurring during the working activities and in the workplace will be assessed as aware assumption of the risk of prejudice to these environmental characteristics:

- a) working under the influence of alcohol and drugs;
- b) consume or give for any reason narcotics during work performance.

Enhancement and protection of employees

SINTESY is aware that qualified and loyal partners constitute an intangible primary value, necessary to achieve company goals and to maintain optimal quality standards. Creation and maintenance of a peaceful and proactive working environment are considered important, also including respect of the privacy of its employees, providing paths of growth and consolidation of the level of professionalism.

The company gives its employees a training program intended to combine the needs of business growth with the training needs expressed by workers and provides the appropriate tools for updating and professional development.

Collaboration and sharing are considered relevant behaviors within the Company, as they allow to create a harmonious and challenging working environment, based on mutual trust and respect. In this way, the organization develops a positive atmosphere of collaboration, which allows to find viable and effective solutions to the problems encountered while on the job.

Each employee must try to contribute to management activities, improvement of efficiency and achievement of excellence performance.

Harassment in the workplace

SINTESY requires that in internal or external working relationships never happens cases of harassment, as:

- a) creating a work environment intimidating, hostile or isolating against individuals or groups of employees;
- b) unjustified interference in the work performed by others;
- c) the obstacle to job prospects of others merely for reasons of personal rivalry.

SINTESY is also committed to ensure a constructive work environment, capable of emphasizing the best qualities of each employee, and free of constraints based on prejudice, orientation or characteristics of the person and generally free of behavior that would undermine the moral integrity (eg. mobbing).

Behaviors that lead to harassment of a sexual nature are not allowed in the workplace, meaning:

- a) the subordination of relevant decision for the working life of the recipient to the acceptance of sexual favours;
- b) the proposals of private interpersonal relationships, made despite explicit or reasonably clear distaste, that have the capacity, in relation to the specific situation, to disturb the serenity of the recipient with objective implications for his work performance.

Protection of physical and moral integrity

SINTESY is committed to provide a work environment compliant with applicable standards for health and safety, through prevention, continuous monitoring and management of risks related to the performance of professional duties.

The mission of SINTESY is to prevent accidents or illnesses related to the conditions of the workplace, and to take all actions necessary or appropriate by, for example, the adoption of a certified system for the management of health and safety at work, the continuous training to company personnel on the activities and safety issues, the constant investment of resources in the purchase of machinery in conformity with the highest standards of prevention and safety and constant maintenance of existing equipment, monitoring and updating working methods, as well as the careful and diligent monitoring of compliance by employees to legal prescriptions and company regulations.

All employees must give constant and careful contribute aiming to enforce and ensure compliance with all diligence provisions under the work.

Conflict of interest

Every decision and action during the employment must be made solely in the interests of SINTESY and would not consider personal benefits.

All employees must avoid situations which may create conflicts of interest and must abstain from personally possible business opportunities related to the performance of its functions.

By way of example, but not exhaustive, it constitutes a conflict of interest:

- a) have economic and financial interests, also through family members, with customers, suppliers, competitors, public administration (e.g. significant share ownership, professional assignments, etc.);
- b) using position or information acquired so as to create a conflict between personal interests and those of the Company.

Anyone operating in conflict of interest must immediately contact their superior and refrain from the execution of conflict activities.

The superior informs the Supervisory Board of the actions taken to ensure that activities are executed in normal conditions.

Gifts and benefits

It's absolutely forbidden to give (or receive), directly or indirectly, to/from third parties (public administration, customers, suppliers, etc.), gifts and/or benefits (money, objects, services, favors or other benefits) such that they can be interpreted by an impartial observer as aimed at obtaining an advantage, also not economic, contrary to the mandatory provisions of law, regulations and the principles of this Code.

Commercial courtesy to customers or suppliers, such as gifts or hospitality, are permitted, when previously and duly authorized, only if limited in value and anyway not compromising the integrity or reputation of either party, and such that they cannot be interpreted by an impartial observer as aimed to obtaining an advantage, even noneconomic, contrary to the mandatory provisions of law, regulations and the principles of this Code.

It is not allowed to accept cash or other benefits from customers or suppliers that could be construed as forms of private corruption.

Use of Company Resources

Each employee of SINTESY must act with due diligence to protect corporate assets by acting responsibly and in line with the operating procedures, avoiding improper use which can cause damage, reduced efficiency or however in contrast with corporate interest.

Likewise, it is mandatory for employees not only to protect these assets, but also to prevent fraudulent or improper use, for their benefit or of third parties.

Finally, it is good practice that all employees of the SINTESY, without distinction of roles, undertake to look after order and security, both in the office and inside the plant, and to avoid all forms of waste.

Transparency and accuracy of information

All employees must ensure the truthfulness, transparency, accuracy and completeness of the documentation and information provided to the conduct of their activities. Information, knowledge and data acquired or processed by collaborators during the performance of their work duties, although not acquired in the workplace, belong to SINTESY and cannot be used, communicated and disclosed without specific authorization from SINTESY.

SINTESY condemns any behavior intended to alter the correctness and accuracy of the data and information contained in financial statements, reports or other communications required by law and communicated to the public, to the supervisory authorities, the supervisory board and the auditors.

SINTESY also condemns any behavior intended to alter the correctness and accuracy of data and business information transmitted to the managers or to other employees of the Company.

SINTESY ensures accuracy and timeliness of the information required from funding agencies, so that their investment decision is based on the true representation of the patrimonial, economic and financial position.

Confidentiality of information

Every employee is required to ensure the confidentiality required by the circumstances for all information acquired by virtue of their work.

Employees of SINTESY ensure proper handling of confidential information and are required not to disclose them to any person inside or outside the Company, unless it is required by law or as a result of statutory duty or internal regulations.

For example, confidential information are those related to research and development, laboratory tests, commercial strategies, lists of customers, characteristics of the organization and partners of SINTESY.

Employees must not use or store confidential information accessible to unauthorized personnel in the workplace as well as at home, in public places or elsewhere.

The use of company computers or access to corporate data from home, and Internet access while traveling or otherwise out of the office require special attention and care.

Privacy policy

SINTESY, carrying out its activities, protects the personal data of employees and third parties, preventing any unauthorized use of their information, in compliance with the relevant regulations and internal procedures.

4.2 Suppliers and Partners

We refer to Supplier as all those who provide SINTESY goods and/or services.

Partners are all the entities acting in the name and/or behalf and/or interest of SINTESY on the basis of a mandate, other contractual relations of cooperation, the transfer of duties or powers and/or other agreements (such as for example, distributors, dealers, agents or consultants, joint venture partners or partners for the construction or acquisition of a business project, etc.).

Good faith and mutual trust

The Company sets with their suppliers possibly long-term relations basing any agreement on criteria of fairness of negotiations and transparency, by requesting them to operate in a consistent manner with respect for people and the environment.

SINTESY is committed to avoid situations of dependence that may affect the business of the supplier and in an environment of trust and collaboration with its suppliers.

SINTESY aims to achieve common goals both economical and ethical.

SINTESY maintains a frank and open dialogue with suppliers, in line with good commercial practice.

SINTESY is performing diligently trade agreements, respecting the conditions, without taking advantage of situations of weakness or ignorance of the counterparties. In particular, it is committed to regular payments and scrupulous quality controls but not oppressive.

Selection of suppliers and partners

SINTESY is impartial in choosing a supplier. The process of selection of suppliers is based on objective assessments according to the principles of fairness, quality, affordability, innovation, continuity, loyalty, punctuality and ethics.

While encouraging the consolidation and continuity in relations, SINTESY does not preclude any supplier, in meeting requirements, the possibility of bidding for supply.

In initiatives such as joint ventures or investments in companies, SINTESY chooses its business partners in relation to reputation and reliability in the market, as well as adhesion to values comparable to those stated in this Code.

Payments, gifts and benefits

The compensation to be paid to their suppliers of goods and services must always be commensurate with the service indicated in the agreements between the parties and the payments will not be released to anyone other than the contractual counterparty.

SINTESY prohibits the giving or receiving gifts and/or benefits (money, objects, services, favors or other benefits) to/from suppliers and/or their representatives (potential or actual) that determine improper conduct or in any way that could be interpreted by an impartial observer as aimed at achieving an advantage, even not economical.

Protecting the safety and health of suppliers

SINTESY protect the health and safety of suppliers who carry out activities at Company's premises with reciprocal adequate preventive actions of organizational and technical nature.

SINTESY ensures that the requirements of its contractors correspond to those required by company procedures and qualification systems.

Confidentiality of information and intellectual property

In compliance with the relevant legislation, SINTESY maintains strict confidentiality on strategic information, confidential information or intellectual property of its suppliers from which expects the same behavior.

SINTESY considers the protection of trademarks, brands, patents, models and designs, of prime importance and endeavor to prevent any form of counterfeiting, alteration or illegal use.

SINTESY prohibit the possession, sale or distribution of industrial products with trademarks, brands, counterfeit or altered and industrial or intellectual property names, trademarks or distinctive signs (domestic or foreign) designed to mislead the buyer on the origin, source or quality of the work or product.

It is also prohibited the manufacture, marketing, distribution objects and goods made of usurpation or infringement of industrial property rights.

Respect for ethical principles

SINTESY evaluates the opportunity, in the light of the importance of relations and supply, to send its suppliers and its partners this Code of Ethics, requesting acknowledgment of receipt and subscription of the content.

4.3 Customers

Quality and efficiency of products and services offered Leadership in his sector and customer satisfaction are the main aims of SINTESY, who directs the organization to continually improve its performance.

SINTESY is committed, for its customers, to achieving and maintaining the highest quality standards of products and services, aligning itself to the target of quality demanded by customers and regulations in force and directing its action towards the performance excellence.

Product safety and innovation

SINTESY is constantly engaged in technology research to provide innovative and reliable products.

SINTESY guarantees the customer maximum safety in the use of products and inform its customers of all risks associated with use of the products, through the publication of relevant literature related to studies, trials and tests carried out by internal laboratories, third party laboratories, certification bodies and/or by the customers themselves.

Fair negotiating and bargaining

The agreements signed with customers are based on the principles of simplicity, clarity and completeness, avoiding the use of any deceptive practice, in order to create and maintain a solid relationship inspired by general values of honesty and competence.

The occurrence of unanticipated events or complaints, SINTESY will not exploit situations of dependency or weakness of the counterparty.

Remuneration, gifts and benefits

The remuneration for the SINTESY products or services sale must always be consistent with the purpose of the agreement and commensurate with the service; the payments received from customers must be made by the contracting party.

It is absolutely forbidden to give (or receive), directly or indirectly, to/from customers gifts and/or benefits (money, objects, services, favors or other benefits) such that they can be interpreted by an impartial observer as aimed at obtaining an advantage, even non-economic, contrary to the mandatory provisions of law, regulations and the principles of this Code.

Data protection

In order to ensure the protection of customers' personal data, SINTESY is committed to treat them in accordance with relevant legislation and in particular the principles of transparency, legality, quality assurance and fairness.

4.4 Public Administration and private independent company

The term public administration means all entities, of public or private law, which carry out a "public function" or a "public service", with whom SINTESY and its employees interact. Included in this area by way of example: local governments (municipalities, provinces, regions, etc.), (relevant Italian Authority) Hospitals, Fire brigade, Local Police, certification bodies for mandatory certification.

Legality, fairness and transparency in the relationship with the Public Administration SINTESY is inspired in the relationship with the public administration, by respect for the fairness and transparency of operations.

No employee of SINTESY can:

- a) give or promise gifts, money or other benefits to such persons in order to influence the impartiality of professional judgment;
- b) send false documents or artfully worded, attest nonexistent requirements or give untrue guarantees;
- c) unduly procure any other type of profit (licenses, permits, remission of charges also social security etc.) by means of trickery or deception;
- d) engage in economic activities with, give or promise gifts, money or other benefits-such as but not limited to- assumptions or promises of employment to public officials or public employees involved in administrative procedures which may result in benefits for SINTESY;
- e) receive unfair contributions, subsidized mortgages or other funds of the same type, whatever they may be called, granted or issued by the Public Administration, through the use or presentation of false documents or false, or the omission of required information;
- f) use grants, subsidies or public funds for purposes other than those for which they are granted.

Employees must report any extortion or bribery by a public official which they are addressed or they have knowledge.

SINTESY requires that all employees pay the highest availability and collaboration against anyone is to carry out inspections and checks on the work of SINTESY.

In anticipation of a judicial proceeding, investigation or inspection by the Public Administration or the Supervisory Authority, no one has to destroy or alter records, minutes and any documents, lie or make false statements to competent authorities. It's forbidden to all employees of the SINTESY to lead, with violence or threats or offers or promises of money or other benefits, a person called to make statements before the judicial authorities to make false statements or not to make the declarations required.

Selection of third parties for the management of relations with the Public Administration

If the Company uses a consultant or a third party to be represented in relations with the Public Administration, those entities acting in name of or on behalf of SINTESY will be invited to agree contractually to the rules of this Code.

In relations with the Public Administration, SINTESY will not be represented by a third parties that might have a potential conflict of interest or lack of integrity requirements.

Contributions and Grants

SINTESY guarantees the accuracy and completeness of the documentation prepared for grants, loans, licenses and concessions from government (European, State, local authorities, etc.).

It also ensures that the grants or loans obtained are used for the purposes for which they were requested and granted.

SINTESY does not finance political parties, candidates or their representatives and trade unions in Italy or abroad, without conducting sponsorship of events connected to them.

Legality, fairness and transparency in the relationship with private third parties

In dealings with third parties SINTESY prohibits all employees to offer or make, directly or indirectly, illicit payments and pledges of personal benefits of any kind, to directors, general managers, managers responsible for preparing corporate accounting documents, auditors or liquidators of the company so that these do or omit acts for the benefit of the Company, in violation of the obligations inherent to their office or of obligations of loyalty. The ban includes the direct or indirect offer of free availability of goods and services, aimed at influencing decisions or transactions.

It is also forbidden to distribute to those representatives of private companies gifts, unless they are of negligible or symbolic value and use; and as well use any form of pressure, deception, suggestion or exploitation of their goodwill for influence their findings as part of any existing relationship with SINTESY.

4.5 Shareholders

Business sustainability

The business risk is protected through a prudent policy, not speculative and careful to safeguard the soundness of the company, aimed at promoting economic competitiveness at the same time, operational efficiency and effectiveness.

SINTESY observes high standards of good corporate governance to protect its value and reputation, in the interest of shareholders and all stakeholders.

SINTESY promotes behaviors that protect the integrity of corporate assets by directors of Group companies and, in achieving corporate transactions, protect creditors.

SINTESY ensures full transparency of the choices made and takes as its objective to maintain and develop a constructive dialogue with partners and shareholders.

Therefore, in accordance with the procedures established, it shall promptly provide to shareholders any information that may impact the investment decision, so that they can make informed and aware choices.

Transparency and fairness

SINTESY avoids any preferential treatment to shareholders ensuring fairness, clarity and equal access to information, to prevent unauthorized use of the same information.

4.6 Competitors

For SINTESY it is of primary importance that the market is based on a fair and loyal competition.

SINTESY and its employees are committed to compliance with the laws and, in particular, ensuring compliance with the European and international antitrust laws in all forms of agreements and business practices.

In particular, SINTESY:

- a) do not deny, hide, manipulate, or delay any information requested by the antitrust authorities;
- b) prohibits to discuss or have other contacts with competitors regarding the determination, stabilization or discrimination in pricing;
- c) prohibits agreements with competitors regarding territories or markets where products are sold in competition for the purpose of allocation of markets or customers;
- d) prohibits to discuss or have other contacts with suppliers or customers that restrict illegally trade or exclude one or more competitors from the market.

Employees of SINTESY should not obtain competitive information (such as, for example, activities, methods of manufacture, technology) by illegal means or unethical (e.g., theft, bribery, misrepresentation, espionage).

4.7 Community

This framework includes the set of stakeholders whose interests are affected by the direct and indirect effects of the activities of SINTESY. By way of example it is the local community, the media and the natural environment.

SINTESY, in order to improve the social environment in which it operates, can manifest its commitment on sensitive and relevant to the community and promotes partnerships with local institutions. In any donations or grants for donations, SINTESY select initiatives that offer a guarantee of quality, which are distinguished by the ethical message transmitted and that contribute to social development.

The disclosure of data or information, when done, must be truthful, transparent, adequate, appropriate and consistent with the Company's policies, as well as cured only by the delegated functions. In this regard, employees shall refrain from holding behavior or make statements that could in any way damage the image and interest of SINTESY.

4.8 Environment

The assumption of environmental policy of SINTESY expresses the belief that the environment is a common good to protect.

Stated the compliance with specific prevailing legislation, SINTESY shall take appropriate measures to preserve the environment and the community, promoting the development of activities in line with this objective.

SINTESY conducts its activities in facilities within the limits of permits, licenses and public authorizations. SINTESY is committed to train its employees so that they are aware of the environmental aspects and impacts of its activities and to reduce the effects of their actions, in accordance with statutory procedures. SINTESY is committed to the use of processes, technologies and materials that reduce consumption of natural resources and involving the least environmental impact; to limit production of waste through, where possible, their re-use. With respect to raw materials or end products potentially polluting, SINTESY guarantees the utmost care to respect the safety of their transportation, transit, storage, disposal.

5. Implementation and compliance with the Code

SINTESY employees must observe and comply with the principles of this Code. Compliance with the principles of the Code is an essential part of the contractual obligations to the Company under and for the purposes of the regulations.

The Code is an integral part of the Organization management and control (the Model) adopted and inspired to the Italian Decree n. 231/01.

The Code of Ethics is brought to the attention of employees and co-workers and anyone SINTESY fit bind to comply with this Code, through explicit reference to the respect of the Code in these arrangements.

This Code is available on the intranet website of the Company and is distributed in the manner deemed most appropriate by the Company for its effective disclosure.

SINTESY is committed to enforce this Code through the timely application of sanctions provided by the disciplinary system provided for by the applicable national collective bargaining agreement and related contracts signed with its counterparts.