CODE OF ETHICS

ARTICLE 1 - INTRODUCTION
The Prometeon Group conducts its internal and external operations in accordance with the principles in this Code of Ethics (the "Code"), in the belief that business ethics must be pursued alongside business success.

Directors, statutory auditors, senior management, employees of the Prometeon Group and, in general, anyone in Italy and abroad operating for or on behalf of the Prometeon Group or that has business dealings with it ("Recipients of the Code") shall, in carrying out their functions and responsibilities, comply with the principles and requirements in this Code of Ethics.

ARTICLE 2 - PRINCIPLES OF CONDUCT
Integrity, transparency, fairness and honesty form the basis for the activities of the Prometeon Group.

In particular, the Prometeon Group:
• pursues excellence and competitiveness on the market, offering its customers high-quality products and services that effectively respond to their needs;
• ensures that its actions are fully transparent to all its stakeholders, without compromising the confidentiality needed in running its business and
ensuring its commercial operations are competitive; for this reason Recipients of the Code shall observe the utmost confidentiality of information acquired or obtained through or when carrying out their functions;

• undertakes to promote fair competition, an essential requirement in the pursuit of its own interest and a guarantee for all market operators, for customers, and for stakeholders in general;

• eschews and condemns the recourse to any conduct that is illegal or in any way improper as a means of securing its economic aims, the latter being pursued solely through the excellence of its performance in terms of innovation, quality, and economic, social, and environmental sustainability;

• safeguards and develops its human resources;

• upholds the principle of equal opportunity in the workplace, regardless of gender, marital status, sexual persuasion, religious faith, political and trade-union views, skin colour, ethnic origin, nationality, age and disability;

• pursues and endorses the protection of internationally proclaimed human rights;

• uses resources responsibly, in line with the aim of achieving sustainable development, while respecting the environment and the rights of future generations;

• will not tolerate the corruption of public officials, or any other party, in any guise or form, or in any jurisdiction, or even in places where such activity is admissible in practice, tolerated, or not challenged in the courts. For this reason, Recipients of the Code are prohibited from offering complementary gifts or other benefits that could constitute a breach of regulations, or are in conflict with the Code, or might, if brought to public notice, damage the Prometeon Group or even just its reputation;

• defends and protects its corporate assets, also using means to prevent acts of embezzlement, theft, and fraud against the Group;

• protects and safeguards its corporate reputation, which is an intangible asset of the company and Group, and the reputation of all its staff, expecting from itself a conduct that is matches these objectives, also in order to preserve the corporate culture embodied by the set of values which reflect the Prometeon Group’s distinctive profile;

• condemns the pursuit of personal interests and/or interests of third parties to the detriment of social interests;

• is committed, internally and externally, to complying and ensuring compliance with local laws, in keeping with its role as an active and responsible member of the communities it operates in;

• establishes organisational mechanisms to prevent infringements by its employees and external staff of the rules and principles of transparency, propriety, and fairness, and checks that these rules are complied with and implemented.

ARTICLE 3 - INTERNAL CONTROL SYSTEM

The efficiency and effectiveness of the internal control system are essential for operating the business in keeping with the rules and principles of this Code.

Internal control system refers to the tools, activities, procedures and organisational structures that, through an integrated process to identify, measure, manage and monitor major risks, ensure the following aims:

• the effectiveness and efficiency of business operations, also guaranteeing that documents and decisions are traceable;
• the reliability of financial reporting and management information;
• compliance with laws and regulations;
• the protection of corporate assets.
For the above purposes, Recipients of the Code shall contribute to continually improving the internal control system.
In carrying out their work and in connection with their own responsibilities, the control and supervisory bodies, Internal Audit and independent auditors have direct, full and unconditional access to all personnel, activities, operations, documents, archives and company assets.

ARTICLE 4- STAKEHOLDERS
The Prometeon Group adopts a multi-stakeholder approach, meaning that it pursues long-term, sustainable growth intended to represent a fair compromise between the expectations of all those who interact with the Group and its companies.

Shareholders, investors and the financial community
In its relations with all types of shareholders, with institutional and private investors, financial analysts, market operators and, in general, with the financial community, the Prometeon Group is fully transparent, complying with requirements of accuracy, timeliness and equal access to information and aims to ensure that the Group's assets are properly valued.

Environment
The Prometeon Group manages its operations respecting the environment and public health.
Investment and business decisions are anchored to environmental sustainability, with a view to eco-compatible growth, also through the adoption of special technologies and production methods - where operationally feasible and economically viable - that allow for a reduction in the environmental impact of operations, and in some cases even below statutory limits.
The Group uses certified environmental management systems to control its operations, and selects production methods and technologies that reduce waste and conserve natural resources.
The Group works alongside leading national and international organizations to promote environmental sustainability both on a local and global scale.

Customers
The Prometeon Group bases the excellence of its products and services on continual innovation. Its goal is to anticipate customers’ needs and meet their demands with an immediate and professional response that is delivered with fairness, courtesy and the utmost cooperation.

Human resources
The Prometeon Group recognises the crucial importance of human resources, in the belief that the key to success in any business is the professional input of the people that work for it in a climate of fairness and mutual trust.

The Prometeon Group safeguards health, safety and industrial hygiene in the workplace, both through management systems that are continually improving and developing and by promoting an approach to health and safety based on prevention and the effective management of occupational risks.
The Prometeon Group considers respect for workers’ rights as fundamental to the business.
Equally, the Prometeon Group expects a conduct based on mutual respect, integrity and the dignity of people.
Working relationships are managed with particular emphasis on equal opportunities, on furthering career development and on empowering diversity, to create an inclusive working environment.

**Suppliers and external staff**
I Suppliers and external staff play a key role in improving the overall competitiveness of the company. In pursuing the utmost competitive edge, the Group's relations with suppliers and external staff are based on fairness, impartiality and ensuring equal opportunities for all parties concerned.
II The Prometeon Group requires its suppliers and external staff to comply with the principles and rules in this Code.

**The wider community**
Relations between the Prometeon Group and public authorities at local, national and supranational levels feature full, active cooperation, transparency and due recognition of mutual independence, economic targets and the values in this Code.
The Prometeon Group intends contributing to the prosperity and growth of the communities it operates in, by providing efficient and technologically advanced services.
The Prometeon Group endorses and, where appropriate, supports educational, cultural, and social initiatives for promoting personal development and improving living standards.
The Prometeon Group does not give contributions, advantages or other benefits to political parties or trade union organisations, or to their representatives or candidates, without prejudice to its compliance with any relevant legislation.

**Competitors**
The Prometeon Group acknowledges that proper and fair competition is essential for businesses and markets to grow and it manages its own business embracing competition that targets innovation, and the quality and performance of its products. Group companies and all their employees must eschew unfair commercial practices and, under no circumstances, does a belief that they are acting in the interest of the Group justify conduct that goes against these principles.

**ARTICLE 5 - COMPLIANCE WITH THE CODE**
The Prometeon Group requires all Recipients of the Code to adopt a conduct that is in line with the general principles herein. Accordingly, all Recipients of the Code shall refrain from any conduct that goes against these principles.

The Prometeon Group also requires all recipients of the Code of Ethics, including external staff, to report any known violations of this Code of Ethics promptly and based on established procedures. The Group undertakes to adopt procedures, rules or instructions for specifically ensuring that the values herein are reflected in the actual conduct of the Group, its employees and external staff. A breach of the principles and content of this Code may amount to non-performance of the primary obligations of employment agreement and/or contract, with the possibility they disciplinary measures may be adopted, as provided for by legislation, collective agreements or contracts.