

Code of Conduct

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INTRODUCTION

NOVATEC srl Code of Conduct identifies company principles and values and specifies the behavior rules every subject working within the company must comply with in order to ensure company regular activities, management reliability and corporate image.

Such principles shall inspire company activities and professional relations with corporation external parties.

The principles NOVATEC conduct must draw its inspiration from are as follows: frankness, transparency, law compliance, fair competition, protection of customers', suppliers', employees', partners', institutions' and community interests. NOVATEC aims to create a company context ensuring high professionalism and conducts congruent with laws and NOVATEC values.

1. BENEFICIARIES AND SCOPE

Principles and provisions in this Code of Conduct shall be binding to the company managers, to employees and to people working for the Company with whatever character (hereinafter referred to as "consultants").

Principles and provisions in this Code of Conduct represent exemplifying specifications of the general diligence, honesty and fairness obligations characterizing the work and the conduct employees and consultants are required to respect in dealings with their colleagues, customers and suppliers.

All the subjects interacting with the company (other companies, customers, suppliers) are required to respect this Code of Conduct.

2. GENERAL PRINCIPLES

Interpersonal relationships and behaviors at all company levels, must be based on NOVATEC basic ethical values as follows: *honesty, fairness, impartiality, diligence and professionalism*.

By *honesty* applicable laws and Code of Conduct compliance is meant. Company interest can never justify illegal conducts.

By *Fairness* this Code means acting in good faith, loyalty and sense of responsibility in order to establish fair business relations and protect the company assets (patents, know-how, ...).

By *Impartiality* this code means avoiding any discrimination forms based on age, sex, sexual orientation, health conditions, race, nationality, political opinions, trade union and religious beliefs.

By *diligence* and *professionalism* the diligent performance of one own professional performances is meant in order to achieve effectiveness and efficiency goals in the company interests.

If any doubt related to the procedure to be followed arises, employees will contact their representative manager and any other subject will advert to the appointed company contact person.

3 MANAGERS, EMPLOYEES AND CONSULTANTS

Company employees recruitment and remuneration policies are based on professionalism and excellence criteria.

The relationship between the company managers, employees and consultants are found on the civility in accordance with individual rights and freedoms and with some fundamental principles such as the non-discrimination due to nationality, language, sex, race, religious belief, political or union membership, physical or psychological conditions.

Regardless of their responsibility level, managers, employees and consultants relations shall undertake fair, honest and respectful relations, being understood their different roles and functions.

Managers, employees and consultants are required to be collaborative and to fulfill their

charges in a responsible, efficient and diligent way.

4. COMPANY ASSETS

Employees and consultants are required to act diligently to maintain in working order the company assets (both tangible and intangible ones) at their disposal and shall avoid improper uses.

Managers, employees and consultants are required to maintain strict confidentiality about documents, know-how, projects, activities and about information relating to the Company.

Information and documents may be collected, used or disclosed exclusively by authorized persons in a general way, by location or business function or by special responsibility.

5. RELATIONS WITH CUSTOMERS, SUPPLIERS, CONSULTANTS, PUBLIC BODIES OF AUDIT AND CONTROL AUTHORITIES, TRADE UNIONS AND POLITICAL PARTIES

The priority company aims are as follows:

- customer satisfaction;
- suppliers and / or consultants choice for goods and services purchase ensuring high expertise and professionalism and good price/quality ratio;
- constructive, transparent and lasting relationships with customers, suppliers and employees.

It is equally important in relationships with customers, suppliers and employees:

- to operate within the law;
- to fulfill company commitments;
- to communicate true and complete information promptly.

Company managers and employees shall not fraudulently nor corruptively act towards consultants, customers, suppliers, and public bodies staff and audit and control authorities.

Managers and employees must refrain from working if a conflict between their own personal interest and the company one occurs.

The company does not grant any subsidy to political parties, movements, committees, political organizations, labor unions and to their representatives. It acknowledges the important role of such bodies in the company activity as well.

6. CODE DISCLOSURE

The company undertakes to inform managers, employees, consultants and people it is in a business relation with, about the regulations in this Code of Conduct and urges compliance.

The company shall disseminate this Code by illustrating its contents and shall make it publicly available on its website.

7. CODE VIOLATION

Any violation of this Code of Conduct on the part of recipients involves both compensation for damages caused by such non-compliance and sanctions.

Employees must respect the Code in addition to their general duties of loyalty, fairness, work contract execution in good faith.

The Code violation represents a breach of the obligations arising from the business relationship and will be subject to the contractual and legal consequences.