



CODE OF ETHICS

Data	Version	Note
01.07.2021	1	First processing
27.04.2022	2	Update
31.10.2025	3	Update

Index

1.	Premise	16
1.1	The Fluorseals Group	16
1.2	Purpose	16
1.3	Recipients	16
2.	Principles General	16
2.1	Legality	16
2.2	Diligence, honesty and fairness	16
2.3	Non-discrimination	17
2.4	Confidentiality	17
2.5	Loyalty	17
2.6	Protection of individual personality	17
2.7	Cybersecurity	17
2.8	Transparency and fairness	17
2.9	Sustainability and social responsibility	18
3.	Relations with employees and collaborators	18
3.1	Personnel selection	18
3.2	Personnel management	18
3.3	Protection of the person and equal opportunities	18
3.4	Prohibition of child labour	19
3.5	Illegal activities against people in the workplace	19
3.6	Substance abuse and use and/or other addictions	19
3.7	Protection of health and safety at work	19
4.	Management of the company	20
4.1	Compliance with internal procedures	20
4.2	Accounting management	20
4.3	Tax management	20
4.4	Protection of personal data	20
4.5	Protection of assets	20
4.6	Environmental protection	21
4.7	Management of gifts, gifts, and other forms of benefits	21
5.	Relations with interlocutors	21
5.1	Relations with authorities and public administrations	21
5.2	Relations with political and trade union organizations	22
5.3	Relations with customers and suppliers	22
6.	Value contractual	22
7.	Reporting and whistleblowing	23
8.	Code review and update	23

1. Premise

1.1 THE FLUORSEALS GROUP

The Fluorseals Group, headquartered in Grumello del Monte (Bergamo), is a company of excellence in the production and distribution of semi-finished and finished products in PTFE and thermo-processable materials. Through its investee companies, the Group operates in strategic sectors on an international scale with a vast and qualified network of industrial and technical/commercial partners that allow it to reach more than 55 countries around the world. The Group's companies, currently divided into Flon Gaskets, Ciflon, Fluor One, Fluorseals Asia Manufacturing, Fluorseals America, FluorIM, MCP Engineering Plastics and Thermal Breaks, contribute to strengthening the Group's position in national and international markets, pursuing the path of quality and innovation, through the range of products offered.

1.2 PURPOSE OF THE DOCUMENT

The Fluorseals Group (also "the Group" or "Fluorseals"), in order to clearly and transparently define the set of values and principles that inspire it to achieve its objectives, has prepared this Code of Ethics (hereinafter also the "Code"), the observance of which is essential for the proper functioning, reliability, reputation and image of the Group.

This Code illustrates the values that have always inspired the behaviour adopted by the Group both internally, in the management of its business, and externally, in relations with institutions, suppliers, customers and business partners (including "stakeholders").

Below, the set of values used so far in practice has been consolidated and has therefore been organized in a structured manner, outlined with clarity and transparency.

1.3 RECIPIENTS

All those who operate, directly or indirectly, at any level and in any capacity, within the Fluorseals Group are required to comply with the indications contained in this Code¹.

In particular, the contents of this Code apply, without exception, to corporate bodies and their members, managers, employees, even temporary workers, consultants and collaborators in any capacity, as well as suppliers and all those who operate, whether under a contract or other legal transaction, or in fact, for the achievement of Fluorseals' objectives (hereinafter the "Recipients").

Under no circumstances does the claim to act in the interest of Fluorseals S.p.A. or any Group company justify the adoption of conduct that is contrary to the legislation or the principles and rules of conduct set out herein and/or the internal procedures adopted by Fluorseals.

Each recipient is required to be familiar with the Code of Ethics, to actively contribute to its implementation and to report, as far as they are concerned, violations and non-compliance, also through the provided channels of the so-called "Whistleblowing".

No body of the Group companies is entitled to grant derogations and/or exemptions from the application of this Code. Similarly, no corporate body can be considered entitled to authorise, or endorse, the performance of unlawful acts, which are therefore contrary to mandatory, legal and/or regulatory rules.

2. General principles

Below are the general principles on which Fluorseals orients its strategy and culture and which constitute the foundations for success and development, current and future.

2.1 LEGALITY

Fluorseals recognises compliance with the laws and regulations in force in all the countries in which it operates as an essential principle, in the context of the supply of goods, the provision of services and the operational contexts in which it carries out its activity.

As a global organization, operating worldwide, Fluorseals is subject to a number of laws governing where and with whom to do business.

With particular regard to import and export laws, Fluorseals' policy is to fully comply with all laws relating to customs and export control, anti-boycott laws and regulatory requirements. In some cases, these laws may prevent you from doing business in certain countries or impose requirements or limitations on the products you import, export, or trade.

¹ This includes all companies that fall (as of the date of update of this document) or will fall within the scope of the Fluorseals Group.

2.2 DILIGENCE, HONESTY AND FAIRNESS

Fairness and moral integrity are an indefectible duty for all Recipients.

The Recipients are required not to establish any privileged relationship with third parties, which is the result of external solicitations aimed at obtaining improper advantages for themselves or for Fluorseals. None of the Recipients is authorized to take unfair advantage of another person – natural or legal – through the manipulation, concealment, illicit use of confidential information, the false representation of essential facts or any other unfair practice.

The credibility of Fluorseals must be based on the reputation that is earned over time only thanks to integrity, consistent and qualitatively impeccable behavior.

In carrying out their activities, the Recipients are required not to accept donations, favours or benefits of any kind (except for objects of modest value) and, in general, not to accept any counterpart in order to grant advantages to third parties in an improper way.

In turn, the Recipients must not make donations of money or goods to third parties or in any case offer illicit benefits or favours of any kind (except for objects of modest value or expressly authorised commercial courtesy gifts) in connection with the activity they provide for the benefit of Fluorseals.

2.3 NON-DISCRIMINATION

In relations with Stakeholders and in particular in the selection and management of personnel, in the work organization, in the choice, selection and management of suppliers, as well as in relations with Bodies and Institutions, Fluorseals avoids and repudiates any discrimination regarding age, sex, race, sexual orientation, state of health, political and trade union opinions, the religion, culture and nationality of its interlocutors.

2.4 CONFIDENTIALITY

Fluorseals undertakes to ensure the protection and confidentiality of the personal data of the Recipients and Data Subjects , in compliance with all applicable regulations on the protection of personal data.

The Recipients are required not to use confidential information, learned by reason of their work, for purposes unrelated to the exercise of this activity, and in any case to always act in compliance with the confidentiality obligations assumed by the Company .

In particular, the Recipients are required to maintain the utmost confidentiality with regard to documents suitable for revealing commercial information and corporate transactions learned in the performance of their duties. This information, acquired or processed by the Recipients in the performance of their respective duties, belongs to Fluorseals. They must therefore be kept and protected in an adequate manner with respect to third parties who are not directly affected and may be used, communicated or disclosed only in full compliance with the obligations of diligence and fidelity deriving from the regulations and employment contracts.

Fluorseals also enforces respect for the intellectual property rights of third parties.

2.5 LOYALTY

Fluorseals is committed to achieving fair competition, in compliance with national and EU legislation, in the awareness that virtuous competition is a healthy incentive for innovation and development processes and protects the interests of consumers and the community.

The Recipients, in relation to their functions, are called upon to select only qualified companies or interlocutors with a good reputation, to promptly report to their company contact person regarding possible violations of the Code and to include in contracts the express obligation to comply with the principles of this Code.

2.6 PROTECTION OF INDIVIDUAL PERSONALITY

Fluorseals ensures, in every area of its activity (internal and external), the protection of the inviolable rights of the human person, promotes respect for physical and moral integrity, prevents and removes any form of violence, abuse or coercion.

Sexual harassment or intimidating and hostile attitudes in internal and external work relationships are not allowed. In particular, requests or threats aimed at inducing people to act against the law and this Code or to adopt behaviors that are harmful to the moral and personal beliefs and preferences of each person are not tolerated.

Fluorseals upholds and respects human rights in accordance with the UN Universal Declaration of Human Rights.

2.7 CYBERSECURITY

Fluorseals ensures the adoption of adequate security systems in order to identify threats and risks and to protect data from possible attacks and breaches (internal and external) to the network or computer systems (computers, telecommunication networks, etc.).

Fluorseals is also committed to strengthening security standards, defining internal regulations and monitoring their

implementation, as well as promoting knowledge and awareness of the issue among all Recipients.

The Recipients are required to refrain from any use of company computer systems or social networks that may constitute a violation of the laws in force, an offense to the freedom, integrity and dignity of persons, or that may lead to undue intrusion or damage to the computer systems of others, also in accordance with the provisions of the company's security policies.

2.8 TRANSPARENCY AND FAIRNESS

Fluorseals is committed to clearly defining the roles and responsibilities related to each company operating process and requires the Recipients to be as transparent as possible in providing their interlocutors, and in particular customers, with truthful and easy-to-understand information.

In business relationships, Fluorseals undertakes to verify in advance the available information of the commercial counterparties (suppliers, customers and consultants) in order to ascertain their respectability and the legitimacy of their business.

Fluorseals operates in such a way as to avoid any involvement in operations suitable, even potentially, to facilitate the receipt and laundering of money or other assets deriving from illegal or criminal activities, acting in full compliance with anti-money laundering legislation; pays compensation commensurate exclusively with the service contractually provided; it does not make payments to a person other than the contractual counterparty, nor in a third country other than that of the parties or of performance of the contract and does not make cash payments in violation of the law.

2.9 SUSTAINABILITY

The previously mentioned ethical principles are the basis of the operations of each of the Group companies and have guided Fluorseals towards a path aimed at acting even more responsibly, considering and committing itself to preventing/reducing/mitigating the impacts that the Group generates on people and the environment.

Fluorseals is committed to promoting the sustainable development of its business, communities and the environment in which it operates, in line with the goals of the United Nations 2030 Agenda, based on five key concepts:

- **People.** Eliminate hunger and poverty in all forms, guarantee dignity and equality.
- **Prosperity.** Ensuring prosperous and full lives in harmony with nature.
- **Peace.** Promoting peaceful, just and inclusive societies.
- **Partnership.** Implement the Agenda through strong partnerships.
- **Planet.** Protecting the planet's natural resources and climate for future generations.

All activities are planned and carried out in the awareness of the social responsibility that Fluorseals has towards all its stakeholders: employees, shareholders, customers, suppliers, the environment, communities, commercial and financial partners, institutions, trade associations and trade union representatives. The Fluorseals Group is committed to transparently reporting its financial impacts, risks and opportunities related to sustainability issues in its Sustainability Report.

3. Relations with employees and collaborators

Human resources are an indispensable element for the Fluorseals Group and a critical factor to compete successfully on the market.

The honesty, loyalty, professionalism and seriousness of the staff are among the decisive conditions for achieving the company's objectives and represent the characteristics required by Fluorseals from corporate bodies, employees and collaborators in various capacities.

The management of employment and collaboration relationships is inspired by respect for workers' rights and the full enhancement of their relationship with a view to promoting their development and professional growth. All employees and collaborators are required to act loyally in order to comply with the obligations assumed with the employment contract and the provisions of this Code of Ethics, ensuring due performance and compliance with the commitments made to Fluorseals.

3.1 PERSONNEL SELECTION

The assessment and selection of personnel are carried out in accordance with fairness and transparency, respecting equal opportunities in order to combine the needs of each Group company with the professional profiles, ambitions and expectations of the candidates.

Fluorseals is against any form of favoritism in the personnel selection process, using objective and meritocratic criteria, respecting the dignity of the candidates.

Staff are hired with a regular employment contract and no form of irregular work is tolerated. It is forbidden to hire foreign workers without a residence permit and/or to enter into contracts with them for a duration subsequent to the duration of the residence permit.

When the employment relationship is established, the staff receives accurate and clear information regarding the tasks to be

performed, roles, responsibilities, rights and duties of the parties, regulatory and remuneration elements, rules and procedures to be adopted in order to avoid possible health risks related to the work activity.

3.2 PERSONNEL MANAGEMENT

Flurseals protects and enhances its human resources, paying particular attention to compliance with civil and criminal legislation to protect the psycho-physical and moral integrity of the worker; it undertakes to guarantee the necessary conditions for the professional growth of each person, carrying out the appropriate training for professional updating and any initiative aimed at pursuing this purpose. No worker may be obliged to perform duties, services or favours that are not due to their employment contract and the role held within the Flurseals Group.

Flurseals promotes worker participation by providing tools capable of collecting workers' opinions and suggestions, ensuring their widest participation.

Flurseals is firmly committed to combating episodes of mobbing, stalking, psychological violence and any discriminatory behavior or behavior detrimental to the dignity of the person inside and outside the company structures.

Relations between employees must be carried out with loyalty, fairness and mutual respect, in compliance with the values of civil coexistence and the freedom of people.

In the management of hierarchical relationships, respect for the dignity of the person must be ensured; Any abuse of authority is prohibited, which must be exercised in accordance with the principles of fairness and fairness.

3.3 PROTECTION OF THE PERSON AND EQUAL OPPORTUNITIES

Flurseals avoids any form of discrimination, whether it is related to physical condition, disability, opinions, nationality, religion, sex, sexual orientation and gender identity, or any other condition that may give rise to discrimination.

Flurseals does not favor the inclusion of only male figures but is in favor of and promotes the inclusion of pink quotas in the world of work, without any discrimination of age, ethnicity, level of education or religion.

3.4 PROHIBITION OF CHILD LABOUR

Flurseals does not employ underage workers; if, in full compliance with international legislation (ILO Conventions dedicated to child labour) and applicable national legislation, it decides to provide for the recruitment of underage workers aged sixteen and over (age limit established by Italian legislation), it will ensure that special conditions for the protection of their health and safety, a dedicated path of professional growth and training and will also prohibit their employment during night shifts.

3.5 ILLEGAL ACTIVITIES AGAINST PEOPLE IN THE WORKPLACE

The Group encourages initiatives aimed at achieving greater organisational well-being; for this reason, Flurseals requires that in work relationships (internal and external) there is no harassment or attitudes that can be traced back to mobbing or other forms of violence (physical and verbal), any form of violence is prohibited within Flurseals.

3.6 SUBSTANCE ABUSE AND USE AND/OR OTHER ADDICTIONS

Flurseals promotes a healthy working environment; the Group strongly condemns any form of use, possession or distribution of drugs, promoting a safe, healthy working environment that complies with current regulations.

To prevent the risk of use and abuse of drugs and alcohol, Flurseals collaborates closely with the competent Occupational Physician, who, during the pre-employment and/or periodic examination, will ascertain whether the worker uses or has used these types of substances in the short term.

In Flurseals, therefore, it is forbidden to:

- Possessing, consuming, offering or transferring for any reason, drugs or substances of similar effect, during work and in the workplace;
- Smoking in unmanned places in the workplace.

Although Flurseals tries to promote a culture of awareness against smoking, environments have been identified (outside the production) where smoking can be done during the appropriate break from the work shift.

3.7 PROTECTION OF HEALTH AND SAFETY AT WORK

Flurseals is committed to offering its staff a healthy, safe and respectful working environment for the dignity of workers, ensuring compliance with hygiene and health prevention regulations in order to prevent accidents and illnesses, both at the company headquarters and on construction sites.

Safety in the workplace is ensured both by rigorously implementing the provisions of the law in force, and by actively promoting the culture of safety through specific training programs.

Flurseals disseminates and consolidates a culture of safety among all Recipients, through awareness-raising and training activities, aimed at increasing their sensitivity and awareness of possible risks at work as well as promoting responsible and respectful behaviour and conduct towards their own and others' safety.

Flurseals operates in compliance with the main conventions of the International Labour Organization (ILO), the applicable

national legislation and the conditions provided for by national negotiations regarding:

- freedom of association and the right to collective bargaining;
- child labour;
- child labour;
- health and safety;
- prevention of any phenomenon of discrimination and abuse;
- regularity and transparency in employment contracts, recording of working hours, payment of the salary due.

In particular, Fluorseals:

- identifies the specific figures, in accordance with the provisions of the applicable legislation;
- assesses and manages the risks associated with the use of materials and substances and updates the Risk Assessment Document whenever necessary, for example following any new risks identified or changes in the organisation chart;
- manages training, information and communication on health and safety at work, in line with the risk assessment carried out and in relation to the worker's qualification;
- prepares and archives relevant documentation on health and safety at work;
- manages any non-conformities, preventive and corrective actions;
- it guarantees the safety of plants and equipment;
- manages emergencies and first aid situations;
- manages health surveillance activities in compliance with applicable legislation.

4. Business management

4.1 COMPLIANCE WITH INTERNAL PROCEDURES

Fluorseals believes that management efficiency and a culture of control are essential elements for achieving its objectives; therefore, each of the Group's business activities is managed in compliance with the criteria of effectiveness, efficiency and cost-effectiveness through a governance system designed to ensure risk control and transparency in economic and financial management.

The necessary separation of powers and functions is guaranteed by an adequate system of delegations and powers of attorney and by the definition of signing powers consistent with the responsibilities assigned.

The Recipients are required to strictly comply with internal procedures and operating instructions.

The Recipients must also act on the basis of their respective authorisation profiles and keep all appropriate documentation to keep track of the actions taken on behalf of the Fluorseals Group Company, through a filing system that complies with the requirements of truthfulness, accessibility and completeness.

4.2 ACCOUNTING MANAGEMENT

In accounting management, the Recipients are required to act in compliance with the principles of truthfulness, accuracy and transparency.

The Recipients must refrain from any conduct, active or omissive, that directly or indirectly violates the regulatory principles and/or internal procedures relating to the preparation of company documents and their accounting representation. In particular, the Recipients collaborate so that each operation and transaction is duly authorized and verified, as well as promptly and correctly recorded according to the criteria indicated by law and applicable accounting standards.

Each accounting entry must be supported by complete, clear and valid documentation, avoiding any form of omission, falsification and/or irregularities.

In the case of assets or income statement based on valuations and estimates, the relevant recording must be based on criteria of reasonableness and prudence.

In order to ensure maximum transparency of each company procedure, access to administrative documents must be guaranteed to anyone entitled to it in accordance with the procedures provided for by current legislation on the subject.

4.3 TAX MANAGEMENT

Fluorseals undertakes to comply with current legislation on taxation in order to ensure the correct determination, certification and settlement of taxes.

In relations with the tax authorities, the Recipients are prohibited from producing incomplete, false or altered documents and data, omitting information or due documents, engaging in misleading conduct or with the aim of providing incorrect data or altering the data entered.

The communications and declarations to be sent to the tax authority must be based on the principles of correctness, adequacy, completeness, and compliance with the provisions of the law on taxes and duties; Each operation or transaction must be

authorized, verifiable, legitimate, consistent and congruous.

4.4 PROTECTION OF PERSONAL DATA

In order to guarantee the protection of personal data, Fluorseals undertakes to process the same in compliance with the relevant regulations and in particular in accordance with the following criteria: transparency towards the subjects to whom the data refer, lawfulness and correctness of the processing, relevance of the processing to the purposes declared and pursued, guarantee of security of the data processed.

4.5 PROTECTION OF HERITAGE

The Recipients exercise their functions by trying to rationalise and contain the use of company resources.

The Recipients are required to correctly apply the security provisions to protect the hardware devices from unauthorized access, which could seriously affect the rights to the protection of personal data.

Company assets and resources must be used only for the work tasks for which the employee is responsible. Damage to or improper use of the goods themselves is prohibited.

4.6 ENVIRONMENTAL PROTECTION

For Fluorseals, environmental protection represents a basic value for the satisfaction of one of the primary needs of the individual citizen and the entire community: to create better conditions for the future of the new generations.

The identification of the relevant environmental aspects according to the activities carried out, the context of reference, is the first step taken by the Fluorseals Group, in order to comply with and exceed the applicable legislation, applying the principles of environmental sustainability referred to in point 2.9 of this document.

Material environmental issues include climate change, water use, consumption of natural resources, waste generation, pollution and biodiversity. The Fluorseals Group is committed to monitoring these issues with particular attention, ensuring compliance with applicable environmental legislation and regulations, preventing and reducing its negative impacts and producing positive impacts.

4.7 HANDLING FREEBIES, GIFTS, AND OTHER FORMS OF BENEFITS

In relations with customers, suppliers, and, in general, with third parties, the Recipients must not promise, accept or offer gifts, gifts and benefits (whether direct or indirect) that have quality or value exceeding normal commercial practices, local customs and ordinary courtesy or, in any case, that are aimed at acquiring preferential treatment, or other undue advantages, with reference to corporate transactions attributable to the Company.

If gifts, gifts, benefits or acts of courtesy or hospitality are offered or promised to the Recipients, they must inform the competent corporate bodies or their manager without delay who will decide on the admissibility of what is offered or promised.

Fluorseals opposes any form of gift to public officials or persons in charge of public service, of any kind, Italian or foreign, or to their families, even through an intermediary, such as to influence the independence of judgment or induce to ensure any advantage to Fluorseals.

5. Relations with interlocutors

5.1 RELATIONS WITH AUTHORITIES AND PUBLIC ADMINISTRATIONS

Relations with the Authorities and the Public Administration must be based on maximum clarity, transparency and collaboration, in full compliance with the law and according to the highest moral and professional standards.

Relations with Public Administrations can only be maintained by the corporate functions delegated to do so.

In relations with Public Officials, Public Service Officers, Judicial Authorities and the Public Administration in general, the Authorised Recipients shall comply with the highest levels of fairness and integrity, refraining from any form of pressure, explicit or veiled, aimed at obtaining any undue advantage for themselves or for the Fluorseals Group.

Fluorseals strictly prohibits, without derogation or exception, any conduct that can be interpreted as a promise or offer of payment, goods or other benefits aimed at promoting its interests and/or obtaining advantages at the expense of public administrations and/or supervisory authorities.

To this end, anyone operating in the name, on behalf or in the interest of the Group is absolutely prohibited from offering, directly or through intermediaries, sums of money and/or goods in kind and/or other utilities or benefits, facilities or services of any other kind, exceeding the normal relational courtesy or in any case of significant size or value, aimed at influencing the activity or decisions of Public Officials or Public Service Officers, or public employees in general, or to compensate them for an act contrary to their official duties.

Fluorseals believes that corruption and other crimes against the impartiality of the Public Administration must be fought with virtuous behavior, binding on anyone who collaborates with Fluorseals.

All conduct that a third party and impartial observer would consider to be excessive of normal commercial practices or

relational courtesy or in any case aimed at improperly influencing a decision or activity is also prohibited.

These requirements cannot be circumvented by resorting to different forms of contributions (e.g. sponsorships, assignments, consultancy, advertising, etc.) that pursue the same illegal purposes mentioned above.

In the event that a company of the Fluorseals Group confers a representative assignment to a third party to be represented in relations with the Public Administration, the third party is subject to the application of this Code, with particular reference to the rules dictated on the subject of conflict of interest, as well as to the directives given with the assignment of the assignment.

It is also forbidden to induce in any way, any persons called upon to make statements before the Judicial Authority, to make untruthful statements or to make use of the right not to answer.

Fluorseals ensures maximum availability and collaboration, including during inspections and verifications, as well as, if due and/or required, the complete production of data and documentation in compliance with the principles of transparency, completeness and fairness.

5.2 RELATIONS WITH POLITICAL AND TRADE UNION ORGANIZATIONS

Fluorseals does not favor or discriminate against any political or trade union organization.

Fluorseals refrains from providing any undue contribution in any form to parties, trade unions or other social formations, except for specific exceptions and in any case always within the limits of what is permitted by the regulations in force.

The Recipients are required to refrain from any direct, indirect or boasted pressure on politicians or trade union representatives.

5.3 RELATIONS WITH CUSTOMERS AND SUPPLIERS

The Recipients deal with third parties with courtesy, competence and professionalism, in the belief that the protection of the image and reputation of the Fluorseals Group depends on their conduct.

The Recipients must refrain from any form of unfair or deceptive behavior that may lead customers or suppliers to rely on unfounded facts or circumstances.

In their relations with customers, the Recipients are required to offer products and services that comply with the regulations and regulations in force on quality, safety and industrial and intellectual property rights, giving full satisfaction to the customer's expectations and providing transparent, reliable and fair information in advertising, commercial or any other type of communication.

Fluorseals recognizes as a primary business strategy and, consequently, of its business success, the appreciation by those who request products or services; for this reason, commercial policies are aimed at ensuring the quality of goods and services, safety and compliance with the precautionary principle.

Relations with suppliers are based on loyalty, fairness and transparency.

The choice of suppliers is made on the basis of objective criteria of quality, cost-effectiveness, opportunity and efficiency.

The choice of suppliers on a purely subjective and personal basis or, in any case, by virtue of interests contrasting with those of Fluorseals is precluded.

The business partners, in addition to possessing (and maintaining for the entire period of validity of the contractual relationship) the requisites of integrity, professionalism, technical-economic required by reason of the subject of the relationship, will be required to assume the obligation to comply with this Code. The violation of the Code, as well as the presentation of false or untrue documents or declarations, involves the application of contractual sanctions on the part of the business partner, related to the violation committed.

The activity of suppliers and external consultants must comply with the regulations on the employment of workers, contribution, remuneration, tax and insurance obligations, procedures aimed at ensuring safety and health in the workplace, as well as the integrity of the environment.

Fluorseals also undertakes not to establish or maintain business relationships with suppliers who employ child labor.

Fluorseals undertakes not to have commercial relations with bodies, companies or individuals in respect of which - as a result of checks and research and by virtue of established facts and/or the existence of other elements commonly considered reliable - it is ascertained, or can reasonably be presumed, the involvement in illegal activities, or the illegitimate origin of the financial resources used, or the entrepreneurial or professional unreliability of the same.

Aware of the need to avoid practices or methods of possible corruption between private individuals, it is forbidden to accept promises or payments of sums or goods in kind of any entity or value, even indirectly in other forms of liberality, utility or benefits, by any supplier, aimed at promoting or favoring its interests.

6. Contract value

Violation of the principles set out in the Code and in the procedures indicated in the internal controls compromises the relationship of trust between Fluorseals and the Recipients of the Code (directors, employees, consultants, collaborators in various capacities, customers, suppliers, business partners). Such violations will therefore be immediately pursued in an incisive and timely manner, through the adoption of adequate and proportionate disciplinary measures, within the limits permitted by current regulations.

Any violations of specific provisions of the Code, depending on their seriousness, may legitimize the withdrawal by Fluorseals

from existing contractual relationships with collaborators, customers or suppliers and may also be identified ex ante as causes of automatic termination of the contract.

This is without prejudice to the right of Fluorseals to request compensation for all damages caused to the Group as a result of the violation of the provisions of the Code of Ethics.

7. Reporting and whistleblowing

If a person required to comply with this Code of Ethics becomes aware, due to the functions performed, of violations, even potential, of the Code of Ethics, he must, in order to protect the integrity of Fluorseals, promptly report them, even anonymously, using the PG17 "Whistleblowing Management" procedure and the tools made available described below.

Fluorseals has structured rules to ensure the confidentiality of the identity of the whistleblower who reports non-compliance with the rules contained in this Code of Ethics, applicable laws and regulations based on the following principles:

- Guarantee of the confidentiality of personal data and protection of the reporting party: the professional to whom Fluorseals has given a specific mandate to receive, evaluate and examine reports is external to Fluorseals and required to guarantee the utmost confidentiality on the facts reported, on the identity of the reported person and the whistleblower who, in any case, is appropriately protected from retaliatory conduct, discriminatory or otherwise unfair;
- Protection of the person reported in bad faith: all employees are required to respect the dignity, honor and reputation of each one. It is therefore mandatory for the reporting party to declare whether it has a private interest related to the report. To this end, Fluorseals undertakes to provide adequate protection to those reported in bad faith, censuring such conduct and informing that reports sent with the intention of damaging or otherwise causing prejudice as well as any other form of abuse of this document are a source of liability in disciplinary proceedings;
- Impartiality, autonomy and independence of judgment: all subjects who receive, examine and evaluate reports are in possession of independence and due objectivity, competence and diligence in the performance of their activities.

Reports can be made in the following ways:

- <https://fluorseals.whistlelink.com/>
- Ordinary mail: Serena Somenzi - Via Daniele Piccini, 2 - 24122 Bergamo

The whistleblower must clearly and completely provide all the elements useful for carrying out the checks and assessments necessary to assess their validity and objectivity, providing the following indications:

- Place and date of the facts;
- Any information and/or evidence that can provide valid feedback about the report;
- Personal details or elements that allow the identification of the person who committed what was declared;
- Details of any other witnesses to the incident;
- Any private interests attached to the report

Fluorseals also guarantees that the report will not in itself constitute a violation of the obligations deriving from the employment relationship and, it is also absolutely forbidden to exercise any form of retaliation or discrimination against the whistleblower and those who collaborate in the verification activities on the merits.

The professional in charge has the burden of assessing the validity of what the whistleblower has declared, without prejudice to the confidentiality obligations and in compliance with the rules and principles for the protection of the whistleblower, communicates it to the Company Management. Once the veracity of the report has been ascertained, the Management has the right to take disciplinary action against the reported person.

Fluorseals monitors the maintenance of the functional requirements of this Code over time, taking care of its updating in the event that it is necessary to make corrections, adjustments, modifications and/or additions (for example, in the event of significant violations of the provisions contained therein, changes to the organizational structure or regulatory changes).

8. Code approval, review, and update

The Code of Ethics is approved by the Parent Company, which issues the transposition and adoption directive by all the other companies of the Group, which approve it in their respective Boards of Directors.

The Chief Executive Officer identified, in line with the company's strategies and objectives and in agreement with the departments concerned, is responsible for proposing the appropriate amendments and necessary updates to the Code in order to oversee its consistency and timeliness.

Any amendment to the document follows the same approval process.

The companies of the Fluorseals Group undertake to disseminate the principles and rules of conduct contained in this Code as widely as possible.

To this end, they provide:

- dissemination through the Group's website and the websites of the individual Group Companies;
- training of its employees, so that all Recipients work to promote the contents of this Code.

The Code of Ethics is reviewed at least annually and may be supplemented or amended in all cases where there are significant changes to the provisions of the Code.

The verification of the content and principles of the Code of Ethics and its application is the responsibility of the Managing Director on the subject, who may also promote proposals for integration or modification of the contents.

Any changes, additions and updates to the Code must be communicated to the parties required to apply it, using any useful tool for the purpose.



FLUORSEALS HEADQUARTERS

Via Tribolina, 20/22
24064 Grumello del Monte (Bg) - Italy

Phone +39 035 4492811 | info@fluorseals.it

fluorseals.it | [in](#) [@](#) [f](#) [v](#)

