

**allegrini**

Ethical  
Code

The Ethical Code or Code of Conduct, is the enunciation of the set of rights, duties and responsibilities of the company in respect of all its stakeholders.

It is the result of the formalization of principles and rules that the company decided should guide its behaviors, then the behavior of its members.

|  |         |
|--|---------|
| Introduction:  | pag. 3  |
| 1. Application field and recipients  | pag. 5  |
| 2. Ethical principles  | pag. 7  |
| 2.1 Application of ethical principles:<br>obligations of recipients        | pag. 9  |
| 2.2 Value of the person and of human<br>resources                          | pag. 10 |
| 2.3 Confidentiality  | pag. 12 |
| 2.4 Correctness and transparency of<br>the accounting and internal control | pag. 13 |
| 3. Relations with third parties  | pag. 14 |
| 3.1 Relations with customers   | pag. 15 |
| 3.2 Relations with suppliers and<br>external consultants                   | pag. 15 |
| 3.3 Relations with the public<br>administration                            | pag. 16 |
| 3.4 Sponsorships   | pag. 16 |
| 4. External Communications   | pag. 17 |
| 5. Protection of the environment   | pag. 19 |
| 6. Violations and punitive consequences                                    | pag. 21 |

# Introduction

Allegrini SpA, which since 1945 realizes chemical products for professional cleaning, in full respect of the environment, has always inspired its activity to the principles of ethical integrity and, consistently, has considered it appropriate to provide the company with a code (hereinafter "Ethical Code") that collects values and establishes principles and rules of conduct that ensue, and the observance of which are kept the social organs, management, employees, contractors and every subject that cooperates to any title with the company.

The Ethical Code of Allegrini SpA collects therefore principles and general rules of behavior which must be observed, in order to ensure the proper functioning and reliability and reputation of the company, directly or indirectly.

Allegrini SpA is particularly careful in promoting the application of the principles contained in the Ethical Code to his activity in the belief that ethical conduct of affairs is at the basis of the success of the company and represents the best expression of their own image, which constitutes a primary value and essential for the group.

In drawing up the Ethical Code, Allegrini SpA has also considered the activities of prevention and contrast of the offenses to which every Italian society is obliged by virtue of the guidelines referred to Legislative Decree N. 8 June 2001 n. 231, in matters of administrative responsibility of institutions (hereinafter also "decree") and therefore the Ethical Code is a fundamental component for supporting the "Organization, Management and Control Model" adopted by Allegrini SpA, within the meaning of the guidelines mentioned above, for the prevention of offenses referred to the Decree.

# 1 Application field

---

## 1 Application field and recipients

This Ethical Code is directed to the social organs and their components, to management, providers of employment, to external collaborators, advisors and collaborators; to agents, public prosecutors, to any other person who can act in the name and for the account of Allegrini SpA and in general to all those with whom Allegrini SpA comes into contact in the course of its activities (hereinafter referred to as the “addressees”).

Allegrini SpA considers a vital principle of its activities the compliance with the laws and regulations applicable in all countries in which it operates, correctness and transparency in conducting business.

Allegrini SpA therefore promotes the creation of an environment characterized by a strong sense of ethical integrity in the conviction that this contributes in a decisive way also to the effectiveness of policies and control systems.

In particular, company’s administrators have required to be guided by the principles of the Code of ethics, in securing corporate objectives, in proposing investments and projects, and in any decision or action relating to management.

Similarly, executives and managers of company functions, in the practical implementation to the activity of management of the company, must be guided by the same principles, both inside, thereby strengthening the cohesion and the spirit of mutual collaboration both in respect of third parties, with explicit prohibition on recourse to illegitimate favoritism, collusive practices, corruption and/or solicitation for personal advantage for themselves or for others.

Allegrini SpA undertakes to ensure the widest possible dissemination of this Ethical Code by providing to prepare every cognitive useful tool and to carry out a process of awareness of its contents, as well as to continuously ensure the degree of compliance within the company itself, and finally to cure the update in line with its organizational developments, commercial and financial.

Recipients must therefore actively contribute to the implementation of the Ethical Code and reports any problems or shortcomings in the Supervisory Board of Allegrini SpA.

## 2 Ethical principles

---



## 2 Ethical principles

Allegrini SpA believes that the respect for the ethical principles laid down in this Ethical Code is an essential condition for achieving the primary objective of Allegrini SpA and consisting in the creation of value for those who provide work in the company, for customers and the community as a whole. In this sense are oriented industrial strategies and financial and operational behaviours, inspired by the transparency and efficiency in the use of resources.

In order to achieve its objectives Allegrini Spa conforms to the following ethical principles (hereinafter also "Principles"):

- compliance with the laws and regulations in force in all the countries in which the company operates;
- legality, loyalty, honesty, transparency;
- confidentiality;
- respect for the value of the person and of human resources;
- respect for competition, which is an indispensable tool for the development of the economic system;
- respect for the environment and awareness to environmental protection.

## 2.1 Application of ethical principles: obligations of recipients

Administrators, Statutory Auditors, Executives and direction and/or divisions managers of Allegrini SpA are obliged to respect this Ethical Code and conform their activity to values of loyalty, honesty and good faith, correctness, integrity.

They are obliged to refrain from any activity which could be considered, even potentially, in conflict with the interests of Allegrini SpA. If during their activities, it arises an own interest, they must communicate to the supervisory board of Allegrini SpA for the necessary assessments.

Employees and Collaborators operate contributing to achieving the social purpose with professional rigor, loyalty, honesty and good faith, correctness, commitment and spirit of mutual collaboration. The criteria of collaboration, loyalty and mutual respect must govern relations between employees of any level, and between these and the third, with which they come into contact in reason of the work activities carried out.

Every action, operation, negotiation and, more in general, any activity carried out by employees and contractors must comply with the rules of transparency, completeness and accuracy of information, as well as the business procedures.

In particular, employees and consultants are required to:

- know and respect the internal procedures regarding permissions, vacation, reimbursement of expenses, taking care to this latter regard to provide adequate documentation;
- know and giving way to every business forecast in matters of security and dissemination of information concerning Allegrini SpA and its competitors;
- use with diligence and exclusively for purposes connected with the performance of the entrusted duties and of business assets;
- use with accuracy the computer systems with absolute prohibition of making manipulations on the data contained in them;
- do not use the name and reputation of Allegrini SpA for personal purposes;
- diligently observe the provisions of this Ethical Code and to refrain from all behaviors in competition with them;

- offer the maximum collaboration in the assessment of the possible and/or alleged violations of this Ethical Code;
- inform third parties that enter into relationship with Allegrini SpA about the requirements of the Ethical Code and requiring compliance.

## 2.2 Value of the person and of human resources

Allegrini SpA promotes the value of the person through respect for physical, cultural and moral, protecting their own employees and collaborators from discrimination of nationality, race, ethnic and religious beliefs, political affiliation and auditors, language, age, gender and sexuality.

In this sense, recipients must cooperate to maintain a climate of mutual respect for the dignity and the competences of each. Allegrini SpA considers its employees and collaborators as a precious and indispensable resource for its existence and its future development. The Company considers it essential to ensure uniformity and consistency of management in all societies and countries in which Allegrini SpA is present, respecting their cultures and local laws.

Allegrini SpA pursues the excellence and the exploitation of the spirit of innovation, in respect of the limits of the responsibilities of each and, at the same time, promotes the participation of people to their own project of growth.

Management and employees are encouraged to take responsibility and to work to overcome the challenges and achieve business goals. The entrepreneurial culture of the company recognizes, promotes and rewards the individual proactivity along with the teamwork.

In order to enhance the skills of their employees, Allegrini SpA adopts criteria of merit and ensures that everyone is given equal opportunities, without discrimination, such that:

- selection and evaluation of personnel is carried out on the basis of objective criteria based on matching skills and professional profiles of the candidates with respect to business needs and in respect of equal opportunities of the candidates;

- information assumed in the context of the selection process are closely related to the verification of the professional profiles sought, in respect of the private sphere of the candidate and his personal opinions;
- the staff shall be recruited in accordance with the contractual typologies laid down by the legislation in force in the countries in which Allegrini SpA operates and from National collective work contracts applicable;
- the allocation of jobs is defined taking into account the competences and capacities of the individuals on the basis of the requirements of Allegrini SpA and on the basis of the professional growth of its employees;
- management policies, training and development are designed to support employees in their path of professional growth and to constantly update their managerial skills and techniques in order to enable everyone to better fulfill its own role and to achieve their business objectives;
- the remuneration system is defined on the basis of the role of employees, the skills and competences that it requires, as well as to the results achieved, together with the continuous comparison and systematically with the external market of reference;
- during the selection process all the information collected, as well as, the documents produced and stored, both on paper and on digital supports, take place in full respect of privacy legislation in force in the various countries.

Allegrini SpA guarantees working conditions respectful of the dignity of the person and in this sense it censures prejudicial and discriminatory conduct even on personal beliefs and preferences, it expressly condemns any form of psychological, physical and sexual harassment.

Allegrini SpA strives for settling in a culture of safety and health of workers, within the workplace, promoting awareness of the risks and the empowerment of individual behaviors

Allegrini SpA acts in respect of their employees and collaborators, in full respect of the dispositions of the Italian legislation on health and safety at work, referred to Legislative Decree No. 9 April 2008 n.81, and its subsequent modifications and integrations, in respect of local regulations in force in the various countries.

## 2.3 Confidentiality

Allegrini SpA, in compliance with the legislative decree no. 196/2003 "Personal Data Protection Code" and of the individual local laws for foreign companies, protection of personal data processed in the framework of its own activity, in order to prevent improper use or even illegal and, consequently, adopts specific procedures designed to:

- appropriate information to interested parties
- acquisition of their consent where necessary

Allegrini SpA applies and constantly updates policies and specific procedures for the protection of information. Each recipient must however conform his behavior to the maximum confidentiality even outside of working hours in order to safeguard the technical know-how, financial, legal, administrative and personnel management and commercial business.

Furthermore, all those who, as a result of the fulfillment of its tasks, have the material availability of confidential and relevant information, are obliged to avoid any misuse or undue dissemination of information.

In particular each recipient has to:

- treat only the data and the information necessary for the purposes of the area in which he performs its tasks;
- to communicate the data and information in compliance with company procedures in force;
- to retain the data and information in such a way as to make them inaccessible to unauthorized parties.

## 2.4 Correctness and transparency of the accounting and internal control

Allegrini SpA, in bookkeeping, acts in strict compliance with the applicable and also regulatory legislation, on the drafting of the budgets and more in general to the mandatory accounting documentation.

The accounting detections of management events, information and corporate data, supplied to third parties, are carried out according to criteria of transparency, fairness, accuracy and completeness.

Every action, operation or transaction must be properly recorded in the company's accounting system, in accordance with the criteria indicated by law and applicable accounting principles and, moreover, duly authorized, verifiable, legitimate, coherent and reasonable in respect of internal procedures.

Recipients are required to pay the maximum collaboration, so that the facts of management are represented properly and promptly in the corporate accounting. They must retain all documentation to support in such a way as to make it readily available and consultable by qualified entities to control.

Allegrini SpA requires and promotes the full respect of the processes of internal control as a tool, for improving business efficiency.

The internal control system consists in monitoring activities that the individual business functions play on their processes, in order to protect corporate assets, effectively manage corporate activities and provide clear information on the economic, financial and equity situation of Allegrini SpA, as well as, in activities aimed at identifying and business risk mitigation.

As far as their competence, the recipients should cooperate actively in the efficient and effective functioning of the system of internal controls.

To business functions in charge is guaranteed free access to data, the documentation and any useful information in the course of the control activities.

## 3 Relations with third parties



### 3 Relations with third parties

Allegrini SpA is particularly attentive to develop a relationship of trust with all its possible interlocutors. In the course of carrying out their activities, Allegrini SpA conforms to the principles of fairness and honesty, requiring all those working on their behalf behaviors honest, transparent and in compliance with laws, not tolerating corruptive and/or collusive conducts, nor not due favoritisms.

It is forbidden to employees and collaborators, in the conduct of any activity connectable to Allegrini SpA to give/offer and/or accept/receive compliments, benefits and/or any other personal utility, except for the gifts of modest value attributable to normal relations of courtesy or commercial practices.

#### 3.1 Relations with customers

Relations with the customer must promote, within the limits of the possible and in respect of the business processes, the maximum customer satisfaction. Comprehensive and accurate information, on supplied products, should be given to costumers to enable them to make informed choices. Allegrini SpA guarantees adequate standards of products and undertakes to periodically monitor the quality.

#### 3.2 Relations with suppliers and external consultants

The choice of suppliers and external consultants is carried out according to the criteria of competence/professionalism, economy, correctness and transparency. In the selection of suppliers and external consultants, as well as in the determination of the conditions for the acquisition of goods and services or in the allocation of professional assignments, recipients must seek to obtain the maximum competitive advantage for the company, by selecting the supplier or the consultant who is capable of providing goods and services, of the required quality to the more convenient terms and conditions.

The conclusion of a contract with a supplier must always be based on reports of extreme clarity, avoiding wherever possible the recruitment of contractual constraints involving forms of dependency for the supplier or the company itself. Fees and sums, to any title paid to suppliers and consultants, for supplies and professional assignments, should be in line with market conditions and properly documented.



### 3.3 Relations with Public Administration

Relations with Public Administration are only those: (i) instrumental to obtain necessary permits for the conduct of the business activity, (ii) aimed at assessing the implications of laws and regulations with respect to business activities, (iii) necessary in response to requests made to Allegrini SpA, by the public administration in the conduct of its institutional activities.

Relations with Public Administration must always be clear, transparent and correct and must not to be susceptible of ambiguous interpretations or misleading.

In particular, recipients should not seek to influence improperly decisions of public administration giving money or other benefits such as job opportunities or business that can benefit public officials or persons entrusted with a public service, as well as their families.

Allegrini SpA cannot deliver direct or indirect contributions of any kind nor allocate funds in support of public entities belonging to the public administration, except as permitted and provided for by the laws and regulations and provided that: (i) are regularly approved by the competent corporate functions, (ii) are regularly documented from an accounting and management point of view, (iii) do not pose any of the recipients in a position of conflict of interest.

### 3.4 Sponsorships

Allegrini SpA can subscribe to requests for sponsorships intended to events that offer guarantees of quality and seriousness. Sponsorship may relate to social themes, environment, sport, entertainment and art.

# 4 External Communications

## 4 External Communications

Every communication to third parties of documents and information concerning Allegrini SpA or other parties with whom the company relates, must be conducted in compliance with laws, regulations and practices of professional conduct in force.

It's in any case forbidden:

- the disclosure of any confidential information acquired in the course of doing business;
- the dissemination of false news or tendentious inherent Allegrini SpA or other parties with whom the company relates in the conduct of its activities;
- every form of pressure aimed at the acquisition of attitudes of favor on the part of the organs of communication/information to the public.

To ensure completeness and consistency of the information, the relationship of Allegrini SpA with organs of information to the public are reserved to the intended functions.

# 5 Protection of the environment

## 5 Protection of the environment

Allegrini S.p.A. intends to ensure full compatibility of its activities with the territory and with the surrounding environment. In order to achieve this purpose, it undertakes to conduct business in total respect of the environment, in particular:

- considering the environmental impact of new activities and new production processes;
- using in a responsible manner and aware natural resources;
- developing a relationship of constructive collaboration, based on maximum transparency and confidence, both internally and with external communities and institutions, in the management of environmental issues;
- maintaining high rates of safety and protection of the environment through the implementation of effective systems of management;
- engaging in the search for methods, formulations and packaging to guarantee the lowest possible environmental impact.

# 6 Breaches and punitive consequences



## 6 Breaches and punitive consequences

All recipients, in case they are aware of the alleged breaches of this Ethical Code or of behaviors, that do not conform to the rules of conduct adopted by Allegrini SpA, shall inform without delay the competent control body of the company, that will verify the validity of the supposed violations, getting in touch, if appropriate, with the person who has made the report and/or the presumed author.

Moreover, information related to official acts resulting from failure to comply with rules and regulations (e.g. measures on the part of the members of the judicial police, requests for legal assistance submitted by managers and/or by employees in the case of start-up of judicial proceedings, etc.) have also to be sent to the control organ of the company.

With regard to the perpetrators of illicit carried out, deemed appropriate measures will be adopted, independently of the possible exercise of the criminal action on the part of the judicial authority, providing to communicate to the business functions authorities the disciplinary imposed measures.

The observance of the provisions of this Ethical Code is considered as an essential part of the contractual obligations of employees. Any violation of the provisions of the Ethical Code constitutes a breach of obligations of the employment relationship and/or disciplinary offense in accordance with local legislation applicable and especially for the Italian companies in accordance with the procedures laid down by art.7 of the Statute of workers and of collective bargaining applicable, with every consequence of law, also with regard to the conservation of employment relationship, and can lead to the award of damages from the same arising.

The respect of the principles of this Ethical Code constitutes part of the contractual obligations assumed by employees, consultants and other subjects in business relations with the company. Any violation of the provisions contained there may constitute a breach of contractual obligations, with every consequence of the law with regard to the termination of the contract or of the responsibility conferred, and compensation for damages.

Allegrini SpA undertakes to enter into contracts with suppliers, collaborators and external consultants, resolved expressed clauses with reference to the case of a breach of the Ethical Code.

