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GENERAL PART

1. INTRODUCTION

FARCK srl is an Italian company, certified UNI EN ISO 9001 highly specialized in the design, construction and installation of:

- equipment and machinery for the food, wine and beverage industries;
- stainless steel storage and process tanks for all production sectors;
- stainless steel tanks for the transport of food liquids, liquids in general and dangerous liquids ADR.

FARCK srl takes care of all the phases involved in the contracts: design, construction, installation, testing and certification, guaranteeing after-sales service, prompt and continuous.

FARCK srl, thanks to the high specialization acquired, is able to realize plants, machines and tanks, without technical limits and dimensions, all in compliance with the strict regulations of design in force.

FARCK srl has special trucks with low floor and suitable lifting equipment, which is able to provide directly to the transport and positioning of any type of plant or tank.

FARCK srl has an organizational model to prevent the risks of committing crimes provided for in D. Lgs 231/2001 and subsequent amendments. This Code of Ethics is an integral part of the Model of Organization, Management and Control adopted and contains the principles and values to which FARCK refers in carrying out its activities and in pursuing its objectives.

2. SCOPE OF APPLICATION

The rules of the Code apply, without exception, to the following subjects (hereinafter "Recipients"):

- Internal Subjects (hereinafter also referred to as "Staff"): who have a continuous, temporary or indefinite relationship with the Company; by way of example, the Corporate bodies, employees, collaborators (including para-subordinated workers), interns and trainees;
- Third Parties (hereinafter also referred to as "Third Parties"): external professionals, partners, suppliers and consultants, administration companies and, in general, those who, having relations with the Company, carry out activities on behalf of and/or on behalf of FARCK, in the course of their activities for the Company, they are exposed to the risk of committing crimes ex D.Lgs. 231/2001 in the interest or benefit of the Company. Each recipient, regardless of position or status, is responsible for their actions in accordance with this Code of Ethics.

In any case, the employees and consultants of FARCK are obliged to comply with the principles of the Code when performing their contractual relationship with the Company or when carrying out the tasks assigned to them by the Company, of the company regulations and instructions and requirements given by FARCK staff. In the event that the Supplier, the external Professional or the Business Partner, in carrying out their activities on behalf of and/or on behalf of the Company (or otherwise, in carrying out their activities for the Company), violates the Code, the Company is entitled to take any action required by applicable law, including termination of the contract. To this end, the Company will adopt in its contracts with the aforementioned entities a specific termination clause expressed ex art. 1456 c.c. (cd. Safeguard clause).

The Code of Ethics is valid both in Italy and abroad, even taking into account the cultural, social and economic diversity of the various countries.

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3. KNOWLEDGE OF THE CODE OF ETHICS

FARCK undertakes to disseminate this Code of Ethics to all stakeholders, internal and external, in a timely and complete manner. In particular, it is committed to ensuring the understanding of this Code of Ethics and the necessary clarifications to all employees and collaborators, so that the Code is considered an integral part of the employment relationship.

FARCK makes the Code fully accessible through its publication on the company's website.

SPECIAL PART

1. GENERAL ETHICAL PRINCIPLES

LEGALITY

FARCK is committed to complying with all national and international laws, regulations and standards and all generally accepted practices.

HONESTY

Honesty is the fundamental principle for all DI FARCK activities, for its initiatives, and it is an essential value of organizational management. Relations with stakeholders at all levels should be based on the principles of fairness, cooperation, loyalty and mutual respect.

FAIRNESS, TRANSPARENCY

The behaviour of FARCK is characterised by:

- honesty, fairness, cooperation, loyalty and good faith
- transparency, implementing information and communication processes inspired by timeliness, clarity, completeness, accuracy and sharing.

COMPETENCE

FARCK is committed to guiding its behaviour according to the highest standards of competence and professionalism. FARCK is committed to ensuring the professional and social development of all its employees and collaborators.

FARCK evaluates the professional and relational skills of its employees and collaborators and ensures that these characteristics are the basis for their evaluation and promotion.

RESPECT AND CENTRALITY OF THE PERSON

FARCK promotes respect for the physical and cultural integrity of the person, freedom of association and respect for the dimension of relationship with others. In particular, FARCK protects and promotes the value of human resources, with the aim of improving and increasing the wealth of skills and knowledge held by each employee. Any discrimination on the basis of age, sex, sexuality, health status, race, nationality, political opinions and religious beliefs is prohibited. Any form of corruption, exploitation, forced labour or child labour is also prohibited.

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FAIR COMPETITION

FARCK aims to protect the value of fair competition by refraining from collusive and dominant behaviour.

DILIGENCE AND ACCURACY IN THE PERFORMANCE OF BUSINESS ACTIVITIES AND PROFESSIONAL SERVICES

FARCK performs its business activities by providing services of a high-quality level. To this end, the professional performance of the employees and collaborators of the Company must be performed with the utmost diligence, accuracy and professionalism. FARCK orientates its activity to the satisfaction and protection of its customers, listening to requests that can improve the quality of its products or services.

CONFIDENTIALITY OF INFORMATION AND PROTECTION OF PERSONAL DATA:

FARCK ensures the confidentiality of the information in its possession and undertakes to use it in compliance with the legislation on the protection of personal data, and never for purposes other than those provided.

ENVIRONMENTAL PROTECTION AND SAFETY

FARCK promotes a culture of safety and prevention, adopting preventive actions and an integrated Risk and Safety Management System. FARCK constantly invests in the use of the best technologies in production activities in order to avoid risk situations for its workers. Any situation of danger to the own safety and third parties, critical during the performance of their work activity, must be reported promptly to their responsible.

The protection and preservation of the environment is a priority objective for FARCK.

To this end, FARCK orients its choices in order to ensure compatibility between the pursuit of its institutional goals and environmental requirements.

2. ETHICAL PRINCIPLES IN INTERRELATED RELATIONSHIPS

2.1 RELATIONS WITH EMPLOYEES

FARCK considers human resources as central to the achievement of its aims.

FARCK aims to develop and enhance skills and competences, including through training and continuing vocational training.

2.2 RELATIONS WITH THE BOARD OF AUDITORS, THE AUDIT COMPANY AND OTHER CORPORATE BODIES

The employees of the Company and the directors are obliged to guarantee maximum cooperation and transparency in the relations that may be required to maintain with the Board of Statutory Auditors, the auditing company, regarding the control activities carried out by them.

In particular, the employees of the Company and the directors must refrain from any conduct, whether incidental or not, which could result in a refusal to mayors, auditors or partners or that implements an operation intended to hinder the search or to divert the attention of the mayors, the auditors in carrying out their audit activities.

2.3 CUSTOMERS AND SUPPLIERS

To consolidate the loyalty and esteem of customers and suppliers, it is essential that each relationship be marked by criteria of loyalty, availability, transparency and professionalism. FARCK is committed to providing answers that meet the needs of its customers and suppliers, providing all the assistance necessary to encourage informed and shared choices, avoiding any form of coercion.

The selection of suppliers and the formulation of conditions for purchasing goods and services is dictated by

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values of competition, objectivity, fairness, impartiality, equity, having regard to price, quality of the good and service rendered, guarantees of assistance and, in general, a thorough and accurate evaluation of the tender. In the formulation of contracts FARCK undertakes to specify clearly and comprehensibly to the contractor the behaviours to be carried out in all the circumstances foreseen and to respect the contractual agreements and commitments, For the performance of tasks and works in the manner determined by the Parties. FARCK requires suppliers to meet the same ethical standards as the company.

In order to safeguard the company's reliability and prestige, FARCK must:

- have as their primary objective the full satisfaction of the recipient of the service;
- create a solid relationship with the interlocutor, inspired by fairness and efficiency;
- Maintain a professional, fair and collaborative attitude towards the customer and supplier, which must be placed in a position to make informed and informed decisions;
- Use clear and simple forms of communication, in accordance with the applicable regulations, without resorting to evasive or otherwise incorrect practices, so as not to overlook any element relevant for the purpose of understanding by the customer or supplier;
- maintain relations with interlocutors who present requirements of seriousness and personal and commercial reliability and at the same time avoid to have business relationships with subjects whose involvement in illegal activities is known or suspected.

2.4 COLLABORATORS

The external collaborators of the Company, whatever they are called ("employees", "consultants", "representatives", "agents", "business procurers", hereinafter, for brevity, the "Employees"), are bound to respect the principles contained in the Code.

FARCK shall identify and select its employees and consultants with absolute impartiality, autonomy and independence of judgment without accepting any conditioning or compromise of any kind aimed at achieving or obtaining favours or advantages. In this context FARCK considers only professional competence, reputation, independence, organizational ability, correctness and punctual performance of contractual obligations and the tasks entrusted.

FARCK undertakes to pay consultants and employees remuneration exclusively in accordance with the performance indicated in the contract or when the assignment is made. Payments may not be made to a party other than the contractual partner or in a third country other than that of the parties or of the performance of the contract, except for reasons relating to the contract or legal assignment. Such acts shall not be interpreted by a third and impartial observer as being intended to obtain advantages and favours in an improper manner, and in any case, they must always be authorised and documented.

The Recipient who receives gifts, benefits or other utilities not directly attributable to normal courtesy relations must take all steps to refuse them and immediately inform his supervisor or the Supervisory Body.

2.5 PUBLIC ADMINISTRATION

FARCK's behaviour towards the Public Administration and its representatives must be guided by the highest level of fairness and integrity.

In general, FARCK ensures full transparency and completeness of information in the preparation of communications, prospectuses and notices to public authorities.

The transactions carried out by the company, as well as the main contacts with the Public Administration must have an adequate record; for each of them, it must be possible to verify the relevant decision-making, authorization and execution process.

Each operation must be properly documented, in order to be able to carry out, at any time, controls that allow (i) verify its characteristics and reasons and (ii) identify the entities that have authorized, the transaction itself

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was carried out, recorded and verified.

The Addressees of this Code are not permitted, directly or indirectly, nor through any intermediary person, to offer or promise money, gifts or compensation in any form, or to exert unlawful pressure, or to promise any object, service, provision or favour to managers, officials and employees of the Public Administration, or to persons in charge of public service and their relatives or cohabiting persons, in order to induce them to perform an act that is consistent with or contrary to the official duties of the Public Administration (the purpose of favouring or damaging a party in civil, tax, criminal or administrative proceedings by bringing a direct or indirect benefit to the company must also be considered as such).

Who receives explicit or implicit requests for benefits of any kind from public administration entities, as defined above, he must inform the direct superior and the OdV in good time so that the most appropriate initiatives to be taken can be identified.

The requirements set out in the preceding paragraphs shall not be circumvented by using different forms of aid and contributions which, in the form of assignments, consultancies, publicity or other, have similar purposes to those prohibited by this paragraph.

In commercial relations with the Public Administration, it is necessary that the Recipients of this Code always operate in compliance with the law and good commercial practice.

In particular, the following operations shall not be undertaken either directly or indirectly:

- a) to examine or propose employment and/or commercial opportunities that may benefit employees of the Public Administration in their personal capacity;
- b) urge or obtain confidential information that may compromise the integrity and/or reputation of either party.

You may not use or submit statements and documents attesting to facts and news that are not true, or omit information to obtain, for the benefit of or in the interest of FARCK contributions, funding, disbursements or other utilities granted by the State, in any capacity, by a Public Body or the European Union.

It is also forbidden to use contributions, funding or other payments, whatever the name, granted to FARCK by the State, a Public Body or the European Union for purposes other than those for which they were assigned.

EFFECTIVENESS OF THE CODE, ALERTS AND SANCTIONS CONSEQUENCES

1. CONTRACTUAL VALUE OF THE CODE OF ETHICS

The rules of the Code are an integral part of the contractual obligations of staff pursuant to article 2104 of the C.C. (Diligence of the employer) and article 2105 C.C. (Obligation of loyalty). The company assesses any conduct contrary to the provisions of the Code from a disciplinary point of view, in accordance with the current regulations, applying the sanctions that the different gravity of the facts may justify.

Compliance with the Code of Ethics is a contractual obligation also for employees and/or subjects having business relations with FARCK. Violations of the rules of the Code of Ethics may constitute contractual default, with all the consequences of law, including the termination of the contract or the relationship and may result in compensation for damages.

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2. VERIFICATION OF COMPLIANCE WITH THE MODEL AND CODE

FARCK has established a Supervisory Body pursuant to D.Lgs. 231/01. In relation to the implementation of this Code of Ethics, the Supervisory Body will have the following tasks:

- Monitoring compliance with the requirements of this Code of Ethics;
- the receipt of reports of any wrongdoing or ethical violations committed within the Company and the subsequent information to the competent social body;
- the proposal of any changes to the Code of Ethics, in order to guarantee the highest possible standards of conduct;
- the internal audit activity, promoting, when necessary, the sanctions procedures;
- issuing binding opinions on the interpretation of this Code of Ethics.

3. REPORTS OF INFRINGEMENTS

Reports of infringements of the Code of Ethics shall be made in accordance with the procedures indicated in the Whistleblowing Procedure adopted by the company.

FARCK shall endeavour to protect reporting entities from any discriminatory and/or retaliatory behaviour, while safeguarding the anonymity of the reporting entity.

4. SANCTIONS

The breach of the Code of Ethics and the Management and Control Organization Model compromises the relationship of trust between the Company and anyone committing the breach (Recipients).

Once violations are established, they will be pursued with determination, promptly and immediately, through the adoption - consistent with what is provided for by the current legal framework - appropriate and proportionate disciplinary measures, irrespective of whether such conduct is criminally relevant or whether criminal proceedings are instituted where it constitutes a criminal offence.

Disciplinary measures for violations of the Code are taken by the company in line with applicable laws and relevant national or company employment contracts. Such measures may also include the removal of the same responsible persons from the Company.

In relation to subjects who are not linked to the Company by an employee employment relationship, violations of the Code will be punished with the application of civil remedies provided for by law.

5. VALIDITY

This Code of Ethics shall enter into force on the date of its adoption by a resolution of the Council of the Ordinary Meeting and shall expire indefinitely.

Any variation and/or integration shall be approved by the Assembly of Farck.