

Organisational Model

Pursuant to Legislative Decree 231/01

Code of Ethics

Updated JUNE 2018

KLK TEMIX SpA

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Società soggetta a direzione e coordinamento di KLK Emmerich GmbH

Società con socio unico

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1. PREMISE

KLK Temix SpA recognizes the importance of ethical and social values in work and business: consequently, it engages in a healthy and responsible management of its activities and social interlocutors, while respecting the community to which it belongs.

From this commitment comes the present Code of Ethics, which has the following purposes:

- Define the fundamental ethical principles of KLK Temix SpA;
- Establish the behavioural rules of reference of those who work with it and for it;
- Promote the dialogue, involvement and consent of these workers;
- Indicate the basis of a voluntary agreement in order to ethically regulate the relations between KLK Temix SpA and interlocutors;
- Representing the basic element for the adoption of the Organizational Model pursuant to Legislative Decree 231/2001 on the administrative liability of institutions.
- Temix's behaviour is considered unethical when it:
- Appropriates the benefits or the collaboration of others through positions of power or strength.
- Fails to comply with applicable laws, regulations and current norms.
- Alters the correctness and veracity of the data contained within the financial statements.
- Hinders the control functions done by the responsible Public Authorities.

The rules of conduct, values and principles set out below, becoming part of the governance system of KLK Temix SpA, confirm the Company's commitment to limit its freedom to operate in purely opportunistic terms and to assure all stakeholders forms of participation and dialogue.

Temix's Governance system guarantees an effective management of the Company's business and a system of internal and external controls adequate to cover operational risks.

In pursuing the company mission, KLK Temix SpA will work to ensure that the principles of this Code are endorsed and shared by the management, its collaborators (members and non-members), by its customers and suppliers and by the civil society.

This Ethical Code consists of:

- Values and principles of a general nature, which the Code inspires, and which KLK Temix SpA intends to protect and share with its stakeholders;
- Rules of conduct of a particular nature, to which the Recipients of the Code adhere;
- Rules for implementing the Code and monitoring its compliance.

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The document is approved by the Board of Directors which will distribute it to all interested parties. The Company's commitment is to ensure that the activities of its services are carried out in compliance with the law, with honesty, integrity, fairness and in good faith, in compliance with the legitimate interests of users, employees, collaborators and contractual partners.

The present Code of Ethics makes explicit reference to the minimum contents expressed in section III of the 'Guidelines for the construction of organizational, management and control models' pursuant to Legislative Decree 8 June 2001, n. 231, approved by Confindustria on March 7, 2002 and updated on March 2014.

In particular, this Code of Ethics punctually declines the minimum contents expressed in the aforementioned Guidelines.

2. RECIPIENTS

Recipients of the Code of Ethics are:

- members of the corporate bodies (president, directors and auditors);
- employees (executives, managers, employees, workers);
- suppliers and other collaborators of the Company who, directly or indirectly, permanently or temporarily, establish rapports and relationships with KLK Temix SpA in the sphere of which they operate to achieve their objectives.

Against this, KLK Temix SpA undertakes to disseminate this Code to all interested parties, to the correct interpretation of its contents and to the provision of tools that facilitate its application.

KLK Temix SpA is confident that the Code's recipients will behave according to the values and principles of the Code, bringing it to the awareness of customers, suppliers and civil society.

KLK Temix SpA also implements the necessary measures to carry out verification and monitoring of the application of the Code, providing for sanctions in the event of its violation. To this end, a specific internal body has been identified with the task, among others, of overseeing the application of the Code.

3. VALUES AND PRINCIPLES

3.1 Values

KLK Temix SpA refers to the great values of civilization and democracy sanctioned by the Constitutions of the Italian Republic and the European Union and by the Universal Declaration of Human Rights of the United Nations, recognizing in the dignity, freedom, equality, solidarity and justice, the base values of civil life.

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In particular, it is fully recognized in Article 41 of the Italian Constitution, according to which the private economic initiative "cannot be carried out in contrast with social utility or in such a way as to cause damage to security, freedom and human dignity".

KLK Temix SpA directs its activities to the principles contained in this Code declaring itself free to not undertake or continue any relationship with those who demonstrate to not share the content and spirit and/or violate the principles and rules of conduct.

Its competent bodies, their members, managers, employees and collaborators are required to comply with this Code.

3.2 Transparency and completeness of information and communications

KLK Temix SpA undertakes to inform the relevant social interlocutors in a clear and transparent manner about their situation and their progress, without favouring any interest group or individual.

Financial, accounting and management information and any other communication meet the requirements of truthfulness, completeness and accuracy.

KLK Temix SpA recognizes the fundamental value of the correct information to the shareholders, to the competent bodies and functions, in relation to the significant facts concerning the company and accounting management. It also recognizes the fundamental value of correct information also to third parties, during the Advisory phase or solicitation of the investment, both for itself and for its customers. In this case, KLK Temix SpA uses the Best Practices or possibly even to third parties, to guarantee impartiality and consistency of judgment.

3.3 Respect for legality

KLK Temix SpA takes on as mandatory principle the strict compliance of all the regulations in force and of the provisions issued by the Supervisory and Control Authorities. The Company adopts internal procedures and organizational and control models aimed at preventing and combating any behaviour contrary to the principle of legality and promotes the "culture of internal control" among all the recipients.

KLK Temix SpA is committed to the maximum effort, as far as it is concerned, to combat corruption, terrorism, money laundering and any other form of crime, intending to pursue its own interests through honest conduct and respect for the law.

The Company undertakes to adopt the appropriate and opportune measures so that this restraint of respect and behavioural ethics is made proper and practiced by all the recipients of the Code itself.

Each recipient is therefore responsible, as far as it is competent, for the compliance of his activity with the principles of the Code and the adoption of corporate control systems; in particular, each employee, within his / her role and responsibilities, is responsible for the proper functioning of the internal control system.

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3.4 Fairness in corporate management and use of resources

KLK Temix SpA pursues its corporate purpose in compliance with the law and the Bylaws, ensuring the proper functioning of the corporate bodies and the protection of shareholders' equity and equity rights, safeguarding the integrity of the company's capital and assets. The use of company resources is based on maximum transparency with regular reporting to the competent internal and external control bodies.

3.5 Relations with Public Administrations

All those who work in the name and/or on behalf of KLK Temix SpA must behave in a way that does not induce the Public Administration to violate its principles of good administration and impartiality.

The persons entrusted by the Company to follow negotiations and/or relations with the Public Administration cannot under any circumstances implement behaviour aimed at illegally influencing the decisions of the Public Administration in order to obtain an illicit or undue advantage or interest at KLK Temix SpA.

KLK Temix SpA forbids and condemns any behaviour carried out by those working in its name and on its behalf:

- Consistent in promising or directly or indirectly offering money or other benefits to Public Officials and/or Public Service Representatives in order to obtain for KLK Temix SpA an illicit or undue advantage or interest.
- The purpose of obtaining from the Public Administration contributions, loans or other proceeds, by means of falsified or altered declarations and / or documents, or information omitted or more generally as a result of artifice or deception aimed at misleading the Provider.
- Directed to allocate for purposes other than those for which they were granted, grants, subsidies, or loans obtained from the Public Administration, even if of modest value.

3.6 Protection and enhancement of people

KLK Temix SpA recognizes the centrality of human resources and the importance of establishing and maintaining relationships based on loyalty and mutual trust. In this sense, it refers primarily to those who carry out their work on behalf of KLK Temix SpA, even in contractual forms other than employment contracts.

All internal and external human resources undertake to act loyally in order to comply with the obligations arising from the employment contract, if subordinated, and as provided by the Code of Ethics, ensuring the services that are required and respecting the commitments undertaken, including in the event that they become aware of the conduct of behavior that is different from those defined therein held by other recipients of the Code.

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The management of the employment relationship is based on respect for the person, on fairness and on the respect of equal opportunities, without any discrimination depending on sex, race, religious belief, political opinions, age or state of health. Any form of discrimination against people is prohibited.

All personnel are hired with a regular employment contract: no form of clandestine or irregular work is allowed.

The decision to start a working relationship or to assign a collaboration authorization must be made on the basis of the correspondence of the candidates' profiles and their specific competences with the company needs, in compliance with the equal opportunities of the candidates. The requested information must be strictly connected to the verification of the professional and psycho-aptitudinal requisites required, respecting the privacy and the political and social opinions of the candidate.

When the collaboration starts, the person receives exhaustive information regarding the characteristics of the duties and the function, the regulatory and remuneration elements and the regulations and behaviors for the management of risks related to personal health.

All decisions made in the management and development of human resources are based on considerations of merit profiles and / or correspondence between expected profiles and profiles of the people. The same applies to access to different positions or roles.

The budget objectives, both general and individual, for employees or collaborators, must be objectively feasible, in relation to the time and means available for their achievement.

KLK Temix SpA promotes the growth of professional skills through training and the sharing of knowledge, in the belief that the individual and collegial contribution to work processes is an indispensable element for the development and enhancement of people.

In managing hierarchical relationships, authority is exercised with equity and fairness, avoiding any abuse. It is an abuse of the position of authority to request, as an act due to the hierarchical superior, services, personal favors and any behavior that constitutes a violation of the Code of Ethics.

In the case of corporate and/or productive reorganizations, the value of human resources is safeguarded, providing, if necessary, training and/or professional requalification actions.

KLK Temix SpA recognizes and respects the role of trade unions and their full right to exercise their work as workers representatives and promotes the dissemination of a correct system of industrial relations, including through the strengthening of workers and trade union participation in the development of the company.

3.7 Health and safety

Respecting the physical and cultural integrity of people represents for KLK Temix SpA an ethical reference value: KLK Temix SpA strives to guarantee the protection of health and safety in the

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workplace, and to exercise the utmost correctness in the management of the working relationship, in compliance with the applicable contracts and laws.

KLK Temix SpA systematically fulfills all the measures required by current legislation on health and safety at work.

The Company informs, stimulates and sensitizes all staff, to avoid that inattention or negligence that can defeat the organizational efforts put in place. Employees and all company employees for various reasons are required to strictly comply with the instructions given in relation to safety.

KLK Temix SpA puts into practice methodologies to make all the safety measures systematic and under control, and systematically monitors the correct adoption of the planned security measures.

3.8 Social and environmental responsibility

In the belief that it is possible to combine the company's profitability needs with respect for ethical values and environmental protection, KLK Temix SpA aims to promote the development of not only economic but also cultural and moral community, investing in energy conservation and care of the environmental impact of its activities, paying attention to waste disposal, consumption of energy resources and the emissions caused.

KLK Temix SpA, in fact, cares about the concept of local community, understood as that set of territory, people, workers, traditions, public and private institutions that represent the social and geographical fabric of which KLK Temix SpA is a part of. The environment is a primary part of this fabric and the safeguarding of it from potential pollution problems is, and must remain, an important aspect for KLK Temix SpA and for anyone working with it.

KLK Temix SpA promotes the spread of the culture of solidarity, security and prevention.

All those who make any purchase of goods and/or services, must act in accordance with the principles of fairness, economy and quality and operate with the diligence of the good father of the family, verifying compliance with the principles of the Code of Ethics by suppliers, with particular regard to the protection of workers' rights and respect for the environment.

3.9 Safeguarding the company image

The reputation of KLK Temix SpA is an immaterial asset of absolute value that allows it to develop trust relationships with its interlocutors. This reputation depends on the image that the company has built over time and has a very fragile nature.

The corporate image, in turn, depends on many different factors, of which the first and greater regards the behavioral ethics held by the people of KLK Temix SpA at any juncture, and in particular in relations with the outside.

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KLK Temix SpA is confident that all recipients will represent it with professionalism, honesty, seriousness and correctness and will work to protect its image.

3.10 Fair competition and correct publicity

KLK Temix SpA promotes a culture of fair competition in the markets in which it operates and acts in compliance with the antitrust laws in force, national and Community, in relationships with customers, suppliers and competitors. The advertising communications of the Company are transparent, fair, accurate and liable to not mislead the people whom they are addressed and not to injure a competitor.

KLK Temix SpA through the people acting on its behalf, does not offer, nor accept money or assets, in any form to promote or favor the conclusion of business to its advantage in violation of laws, regulations in force or free competition. Free gifts are allowed when they are modest and are not appreciable as a means of seeking favors or privileges, in violation of current regulations or fair competition.

3.11 Protection and confidentiality of personal data and information

In accordance with current legislation, the processing of personal data relating to customers, employees, collaborators and suppliers is carried out with the utmost respect for the dignity of the data subject and his right to privacy and protection of personal data.

KLK Temix SpA undertakes to treat such data in a lawful and correct manner, collecting only those that are relevant and not excessive for the purposes for which they are collected.

Furthermore, KLK Temix SpA has analyzed the possible risks incumbent on data processing and has adapted its information systems, both paper and electronic, to minimize the possibility of harmful events; KLK Temix SpA undertakes to keep these systems dynamically updated on the basis of legislative, regulatory and technological developments; at the same time, it has extended responsibilities to all its internal and external collaborators, implementing their monitoring.

3.12 Transparency in relations with the Supervisory and Control Authorities

Temix's communications to the Supervisory and Control Authorities and to the public are exhaustive, not misleading, clear and timely and are only carried out by the corporate bodies and the corporate function in charge of it. The protection of information transparency is encouraged by compliance with the current provisions and internal procedures adopted on the matter.

3.13 Associations and politics

The actions of KLK Temix SpA are governed solely by the principles of its Statute and Rules, in an area of respect for all opinions.

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KLK Temix SpA can contribute to the financing of associations and the support of political parties and/or their organs of information, committees, organizations or political candidates, in compliance with the bylaws and current regulations.

KLK Temix SpA may entertain normal commercial or legal relationships with the same subjects, in compliance with the laws, current regulations and this Code of Ethics.

3.14 Conflict of interests

The recipients of the Code abstain from carrying out acts in which they are the bearers, even indirectly, of interests in potential conflict with those of KLK Temix SpA or of the group in general, such as, for example, personal or family interests of a financial or commercial nature with clients, suppliers, competitors.

Conflicts of interest are the fact that an administrator, manager, employee or collaborator pursues or attempts to pursue for himself or for third parties an objective different from that pursued by KLK Temix SpA, or voluntarily procures or tries to obtain a personal advantage during the fulfillment of activities carried out in the interest of KLK Temix SpA or procures it or seeks to obtain it from third parties. For this reason, practices of corruption, illegitimate favors, collusive behavior, solicitations, direct and / or through third parties, personal and career advantages for oneself or others and other similar behavior are prohibited.

The Management of KLK Temix SpA, its employees, and collaborators refrain from making and/or receiving gifts of any kind and value in the context of labor relations, except that they are of symbolic value and conform to the usual commercial practices, paying particular attention to the relations with employees of the Public Administration.

The customers and suppliers of KLK Temix SpA are invited to refrain from making gifts that could induce the recipients of the Code to behave in contrast with the interests, even moral, of the Company.

KLK Temix SpA recognizes and respects the right of its employees and collaborators to participate in investments, business or other activities outside of those carried out in the interest of KLK Temix SpA, provided that these are activities permitted by law and contractual rules, statutory, as well as compatible with the obligations assumed as members, employees or collaborators.

Any situation that may constitute or lead to a even potential conflict of interest shall be immediately reported to the Supervisory Board and to the hierarchical superior for appropriate measures. In particular, all the members, employees and collaborators of KLK Temix SpA are required to avoid conflicts of interest between the personal and family economic activities and the duties they hold within the structure they belong to. By way of example, but not exhaustive, the following situations determine conflicts of interest:

- Conduct of vertex functions (managing director, director, head of department) or essence of economic or relevant financial interests with suppliers, customers, competitors or business partners of KLK Temix SpA or group, including by their families;

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- Using their position in KLK Temix SpA or the group or information acquired in their work so as to create a conflict between their personal interests and the interests of KLK Temix SpA or the group;
- Carrying out work, of any kind, with customers, suppliers, competitors;
- Acceptance or offer of money, favors or benefits from persons or companies that are or intend to enter into business relationships with KLK Temix SpA or with the group.

3.15 Use of information technology

KLK Temix SpA prohibits any practice that may violate the confidentiality of its own computer systems, of third parties, public or private, or otherwise cause damage, or tends to falsify a public or private computer document having evidential value.

KLK Temix SpA requires compliance with the current legislation on the processing of personal data and the implementation of the relevant company regulations and related documents in the use of IT tools owned by the company.

3.16 Mass-media

Relations with the mass media are reserved exclusively for the functions and responsibilities delegated for this purpose. KLK Temix SpA communicates truthful and transparent information to the outside world.

Members, employees and collaborators do not provide information to the outside, nor undertake to provide it, without the authorization of the competent functions.

In no way or form do members, employees and collaborators offer payments, gifts, or other benefits aimed at influencing the professional activity of mass media functions, or that may reasonably be construed as such.

4. BEHAVIOR RULES

4.1 Common rules

KLK Temix SpA recommends to the recipients of the Code responsible behaviours, consistent with the achievement of corporate objectives and consistent with the values and principles outlined.

Every operation and/or transaction must be legitimate, documented, recorded and verifiable at any time.

KLK Temix SpA condemns any behaviour, from any person put in place, aimed at altering the correctness and veracity of the data and information contained in the financial statements, in the reports or social communications required by law.

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It is mandatory for recipients to maintain correct and transparent conduct in the performance of their duties, in particular with regards to any request made by the Members, the Board of Statutory Auditors, or by the Public Authorities responsible for checks and/or controls, maintaining an attitude of availability and maximum collaboration.

It is forbidden to intentionally disseminate false information, both inside and outside, relating to KLK Temix SpA, its employees and collaborators.

In particular, the recipients who, for the positions held or tasks performed, have access to news or confidential information concerning Group companies:

- do not communicate such news or information to third parties and do not use them for purposes unrelated to their office;
- refrain from carrying out, directly or indirectly, on their own account or on behalf of third parties, transactions on the financial instruments of the companies involved using the same news or information.

From the point of view of commercial practices, any person in KLK Temix SpA, or acting as an external collaborator, is obliged to avoid any form, even promised, of offering cash or other benefits to potential clients or other partners of the company, in order to have KLK Temix SpA choose them as a new supplier.

The foregoing must be understood to be fully valid even by acting through a third party.

4.2 Social bodies

The authoritative, professional, diligence and independence of judgment of the President, the Chief Executive Officer, the Directors and the Auditors of KLK Temix SpA guarantee the achievement of the social aims and the protection of the interests of the social interlocutors.

The administrative body promotes the culture of legality and supervises the full compliance of the company's activity with the laws, regulations and company procedures; it also promotes the culture of internal control and assures the persons in charge of the control the maximum independence and autonomy of action.

The executive Directors exercise their functions in compliance with the contents and limits of the powers granted by the board of directors, to which they report on their work.

It is forbidden to carry out any behaviour on the part of the Company's Directors aimed at causing damage to the integrity of the company's assets.

The Directors must not carry out any type of corporate transaction likely to cause damage to creditors.

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With regard to conflict of interests, the activities of the directors comply with the provisions of the regulations and the related internal guidelines: any conflict situations are managed in total transparency and in such a way as to safeguard the interests of KLK Temix SpA.

Any other conduct that violates the relevant legislation regarding corporate offenses is prohibited.

4.3 Employees

Commitment and sense of responsibility

The KLK Temix SpA employees fulfill their duties with commitment, sense of responsibility, loyalty, seriousness and decorum in compliance with legal and contractual provisions and company directives. KLK Temix SpA also trusts that those who carry out coordination activities behave with courtesy and respect towards their collaborators and promote their professional growth.

Contractual and regulatory obligations

In particular, each employee is required to know and to comply with the obligations arising from compliance with the rules of:

- CCNL applied;
- Company regulation;
- Corporate procedures deriving from the management systems applied

Regarding the last two points, both the managers and the employees, each for their own part of competence, are required to:

- Enforce / comply with the methods for carrying out the activities according to the company procedures issued;
- To report changes that intervene in order to keep the documentation up to date;
- Evaluate and promote reports of improvement from their employees;
- Manage corrective actions and assigned preventive actions;
- Drafting reports and making calculations / calculating the indices for which they are responsible;
- Manage the assigned projects.

Custody of infrastructure, assets and business tools

Employees are responsible for the conservation and protection of infrastructures (including the canteen, toilets, workshop and office spaces) and of goods and tools (including machinery, computers, telephones, cars) that KLK Temix SpA makes available to them for the proper performance of their work, avoiding improper use of the same for purposes unrelated to the activity.

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With regard to the assets owned by KLK Temix SpA, every employee or collaborator is required in particular to:

- Avoid improper use that may lead to undue costs, damages or reduced efficiency or in any case uses contrary to the interest of KLK Temix SpA;
- Adopt scrupulously the procedures, in order not to compromise the functionality, protection and safety of KLK Temix SpA information systems, equipment and systems;
- Always operate in compliance with the safety regulations established by the law and internal procedures, in order to prevent possible damage to property, persons or the environment;
- Use such assets, of any type and value, in compliance with the law and internal regulations;
- Use these assets exclusively for purposes related to and instrumental to the exercise of their work;
- Avoid, except when specifically authorised, the use or transfer of the assets by third parties or third parties, even temporarily;
- Operate in order to reduce the risk of theft, damage, tampering, or other threats to such assets, by informing in a timely manner the functions in case of anomalous situations.
-

Behavioral obligations of the function manager

The manager is required to execute and perform the activities of his / her competence in an effective and efficient manner in order to achieve the company objectives.

The manager is required to behave with correctness, respect and dignity both towards his managers, colleagues and collaborators.

The manager is required to communicate, according to the methods in use, all the information relating to products, services associated with the product, production technologies and no, materials, customers, competitors and markets, which may be known in the performance of their activities.

In particular, the manager must:

- collaborate in the definition of the profiles of the necessary resources;
- participate in selecting the necessary resources;
- inform and train / collaborate in the training of new staff providing all the necessary information (for example in terms of: company rules, use of infrastructure / equipment / company assets, work methods, safety and environment, etc.);
- notify in advance to the management and to the interested bodies all the reasons that prevent the execution of an activity delegated to his department / entity;
- provide collaboration and support to all corporate bodies linked to him;

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- compile and pursue the budget for the cost items for which it is responsible in terms of resources (human, financial and technical), with the aim of improving the efficiency and effectiveness of the area under its responsibility.

Furthermore, the manager, in respect of his internal and external collaborators, is required to:

- verify compliance with the contractual, regulatory and behavioral standards;
- checking and reporting to the Management any non-compliance (for example regarding: company rules, use of infrastructure / equipment / company assets, work methods, safety and environment, etc.);
- organize the resources for which it is responsible;
- guarantee the optimal use of the resources assigned to it (collaborators, goods, equipment, money, etc.) and the correct management, according to the rules specified for each type of apparatus, of the end-life of the equipment;
- verify the correct use of infrastructures (canteen, bathroom, lights, etc.), equipment and company assets (computers, mobile phones, machinery, cars, etc.);
- strive to create the best conditions, in terms of climate and motivation, within the area in which they are responsible;
- report to the Management Department the training needs of their own employees;
- guarantee the continuity and correct execution of activities within their own area, independently of the presence of its collaborators;
- never create conditions of dependence on one's own employees within one's own area;
- enforce and abide with the instructions that, in compliance with current legislation and in terms of occupational safety and waste management, the company has provided;
- ensure compliance with the smoking ban on the company premises.

This task involves the obligation to:

- formally call, by using the reporting form for breaches, violators to comply with the ban on smoking;
- report, in case of non-compliance with the recall, the behavior of the transgressors, the local administrative police (brigade), agents and law enforcement officers (police) which compete to the violation of the ban and the subsequent report of the breach shall be drawn.
- report the non-compliance with the Management Direction

Behavioral obligations of the employee

The employee is required to:

- effectively and efficiently perform the activities for which it is responsible;

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- follow the instructions of your manager;
- maintain a respectful and correct attitude towards both the manager and his colleagues;
- collaborate in updating the company data bank, as far as you are competent;
- communicate to your manager, according to the procedures in use, the information related to irregularities or non-fulfillment of work, of his own or of others, of which he may come to know in carrying out his activities;
- scrupulously observe company directives on occupational safety and environmental management;
- maintain proper confidentiality on personal data and information processed.

Confidentiality obligations

The employees in charge of data processing hold and protect personal data in an appropriate manner, following the corporate provisions issued in this regard. Everyone is required to strictly respect the confidentiality of data and information learned on the basis of the activity carried out and in particular on the technical / patent solutions adopted by KLK Temix SpA.

Duty of informational truthfulness

Each company function is responsible for the truthfulness and originality of the documentation and information provided in the performance of its activity.

Conflict of interest

Each employee complies with the specific corporate provisions regarding conflicts of interest and informs his hierarchical superior in the presence of transactions in which he or she has an interest, even indirect, potentially in conflict with those of the company.

4.4 Collaborators

KLK Temix SpA assesses the importance of the contribution of collaborators and consultants to the daily activities of the Company and asks them to operate with honesty, diligence, seriousness and in compliance with the instructions given in relation to the assignment.

KLK Temix SpA manages relations with its collaborators on terms of equality and mutual respect.

Employees must avoid personal gain from the partnership, acting solely in the interest of KLK Temix SpA and adequately protect and preserve the assets of KLK Temix SpA property and personal data that they have, for the task entrusted to them with the same guidelines governing the employees in the previous point.

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KLK Temix SpA requires its external collaborators to respect the ethical principles expressed here, considering this aspect of fundamental importance for the birth or continuation of a business relationship.

4.5 Suppliers

KLK Temix SpA requires its suppliers to respect the ethical principles expressed here, considering this aspect of fundamental importance for the birth or continuation of a business relationship. Every supplier, commercial partner or external collaborator must be informed of the existence of the Code of Ethics and of the commitments that, according to the same, are required.

The processes of purchase of goods and services are based on the search for competitive advantage, the granting of equal opportunities for the subjects involved, loyalty and impartiality.

The selection of suppliers and the determination of purchase conditions are based on criteria of:

- objective evaluation of the quality and ability to deliver and provide goods, services and adequate level of performance;
- availability, properly documented, the means, including financial, organizational structures, technical knowledge, skills and resources in relation to the intervention to be performed;
- professionalism of the interlocutor.

In procurement reports, works and procurement jobs and, in general, the supply of goods and services, KLK Temix SpA members, employees and collaborators are obliged to:

- adopt objective and transparent evaluation criteria in the selection of the supplier;
- do not foreclose to anyone, in possession of the required requisites, the possibility of competing in the acquisition of the contract;
- observe the contractually agreed conditions;
- maintain a frank and open dialogue with suppliers, in line with good business practices.

The signing of a contract with a supplier and the management of the relationship with it is based on extremely clear and reciprocal relations.

5. OBSERVANCE OF THE CODE

KLK Temix SpA undertakes to disseminate the Code of Ethics to all recipients.

5.1 Compliance with the rules contained in the Code of Ethics

Every recipient of this Code of Ethics is required to know the rules contained therein, as well as the reference rules governing the activity carried out within the scope of his function, arising from the Law and/or procedures, provisions, regulations internal to KLK Temix SpA.

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Each recipient must also explicitly accept their commitments deriving from the Code of Ethics. In particular, the recipients are obliged to:

- refrain from behavior contrary to the rules contained in the Code;
- refer to superiors, or the Supervisory Body referred to in par. 5.2, in the case of request for clarification on the methods of application of the same;
- promptly report to the superiors, or to the Supervisory Body referred to in par. 5.2, any news, of direct detection or reported by others, about possible violations and any request has been directed to violate them;
- collaborate with the departments responsible for investigating possible violations;
- adequately inform each third party with whom they come into contact in the workplace regarding the existence of the Code and the commitments and obligations it imposes to external parties;
- demand compliance with the obligations that directly affect their activity;
- adopt the appropriate internal initiatives and, if they are within their competence, external in the case of non-fulfillment by third parties of the obligation to comply with the provisions of the Code.

5.2 Supervisory Body

A Supervisory Body is set up specifically for the following tasks:

- monitor the application of the Code of Ethics by interested parties through the application of specific organizational rules and accepting any reports provided by internal and external social partners;
- periodically report to the Board of Directors on the results of the activity carried out, reporting any significant violations of the Code of Ethics;
- expressing opinions on the revision of the most relevant policies and procedures, in order to ensure consistency with the Code;
- provide, where necessary, to the proposal for the periodic revision of the Code of Ethics.

5.3 Violations and penalties

Compliance with the Code of Ethics is an integral part of the recipient's contractual obligations.

The violations committed by the Directors, Employees and Collaborators of KLK Temix SpA are subject to the company disciplinary system in force, as provided for by the applied national collective bargaining: behaviors contrary to the Code will be sanctioned, respecting the right of defense, due to the seriousness of the conducted on the basis of the provisions of the law and of the contract, and may constitute a cause for termination of contractual relations with the recipients, where the trust relationship fails or a serious breach of the duties of correctness and good faith in the execution of the contract.

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To violations of the Code by employees, the company rules on disciplinary sanctions apply, as well as, where applicable, the specific provisions of the Organization and Management Model adopted pursuant to Legislative Decree June 8, 2001, n. 231.

6. MODIFICATIONS AND INTERGRATIONS

The Code of Ethics may be amended and supplemented by a resolution of the Board of Directors of the Company, based on the experience of the application or on the proposal of the Supervisory Body.

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