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1. INTRODUCTION

This document intends to explain the principles and standards of ethical and professional behavior that our Company requires of all its collaborators in the daily performance of their work and in all commercial and institutional relationships that involve our business.

It also wants to assure all our partners that our actions are, and will be, in accordance with the law and with our values and principles of behavior.

2. RECIPIENTS OF THE CODE OF ETHICS

The recipients of this Code of Ethics are the directors, the corporate control bodies (statutory auditor), the area managers, the employees of Al Ti Color as well as all those who, directly or indirectly, permanently or temporarily, establish relationships and relations with Al Ti Color, each within the scope of their functions and responsibilities.

The recipients must comply with the laws and regulations applicable in the various geographical contexts in which we operate and base their behavior on what is set out in this Code of Ethics.

The recipients are also required to know and comply, in relation to the function performed and the level of responsibility assumed, with the company procedures applicable to them.

3. AL TI COLOR'S VALUES AND PRINCIPLES OF CONDUCT

RESPECT

We work together to create an environment in which it is pleasant to work. An environment where relationships between people are held in high regard and where listening, respect for opinions and harmony are a daily commitment for everyone, in every activity that is carried out.

We take care of the relationships we create with others, taking into account the diversity and ideas of each person within our Company.

INTEGRITY

We all have a responsibility to work with the highest integrity when acting on behalf of Al Ti Color.

Depending on their role and responsibilities, recipients of this Code are required to be aware of the requirements arising from applicable laws and regulations. Everyone is required to strictly comply with such laws and regulations, as well as respect this Code of Conduct.

RESPONSIBILITY

With a sense of responsibility we evaluate in advance the effects of our choices and our behaviors, taking responsibility for any consequences.

COMMITMENT

Everyone must always give their best effort, as well as encourage and expect the best effort from others in every activity performed, with a focus on continuous improvement.

HONESTY

We act according to criteria of objectivity and incorruptibility.

We are loyal to the Company and do not benefit ourselves or third parties from commercial opportunities that are due to it.

We refuse donations or favors with the exception of gifts and acts of commercial courtesy of modest value and in any case we refuse those aimed at obtaining preferential treatment in the conduct of any activity connected to our Company;

Gifts that do not comply with this rule must be refused.

We do not make donations in money or goods, with the exception of gifts and acts of commercial courtesy of modest value agreed upon by the company;

We avoid any form of illicit actions or benefits;

In the event of a promise, offer or request for bribes we immediately inform management.

LOYALTY AND CORRECTNESS

We avoid any activity that conflicts with the correct fulfillment of our duties or that may in any way harm the interests or image of the Company.

We promote social or interpersonal relationships aimed at establishing a climate of trust and collaboration that is essential for building and maintaining personal and collective well-being;

We keep our word and commitments.

We are committed to promoting fair competition in our interest and as a guarantee for all market operators, customers and stakeholders in general;

We condemn any form of misleading conduct and/or aimed at altering the rules of free competition.

We reject any conduct aimed at committing crimes and expressly prohibit any form of agreement - whether with individuals employed by the Company or with third parties - aimed in any way at pursuing illicit objectives.

TRANSPARENCY

We transmit correct and timely information to stakeholders, clearly and precisely representing economic, financial, social and environmental results. We stimulate internal discussion and criticism in a logic of continuous improvement. We promote the exchange of information at all levels of the organization.

ETHICS

We pursue morally and legally lawful behavior.

We act in full respect of human rights, the health and safety of people, and the well-being of the local communities in which we operate.

We condemn child or forced labor, gender, religious, cultural, ethnic or sexual discrimination, or physical, psychological, verbal abuse or sexual harassment;

We reject corruption in all its direct and indirect forms;
We do not use company materials or equipment for private purposes.

CONFIDENTIALITY

We manage data and information with the utmost care without causing material or moral damage to the Company or our interlocutors.

We act in compliance with current privacy legislation and in accordance with company procedures.

We do not take advantage of information obtained in the performance of our business functions to directly or indirectly gain advantages and we avoid any improper and unauthorized use;

We avoid public statements that are detrimental to the image of the Company unless this falls within trade union rights.

PROFESSIONALISM

We carry out our work according to the highest criteria of technical and ethical correctness in compliance with the rules.

SUSTAINABLE GROWTH

Our goal is to ensure long-term responsible development, taking into account the repercussions that each decision taken can have, repercussions in the economic, social and environmental fields.

The creation of value is combined with the progress of society, attention to stakeholders and the improvement of living standards and the quality of the environment.

CUSTOMER FOCUS

We are committed to understanding the market and considering the impact of every action and behavior on our customers.

QUALITY AND PERFORMANCE

We guarantee the highest quality of products, the excellence of systems and production processes.

FINANCIAL INTEGRITY AND ACCOUNTING TRANSPARENCY

We record accounting transactions accurately, completely and promptly in order to provide a faithful representation of the economic, equity and financial situation and of the management activity.

We support each transaction with adequate, clear and complete documentation, which must be kept on file and must be easily available and such as to allow, at any time, control over the reasons and characteristics of the transaction itself. In particular, we ensure that no payment is made without adequate supporting documentation.

We allow access to information to all those who are legitimately interested in knowing the company facts in the exercise of their functions.

We guarantee compliance with the law and we undertake not to operate any form of financing, direct or indirect, and not to facilitate in any way groups or associations that pursue illicit purposes.

ANTI-MONEY LAUNDERING, TERRORISM FINANCING

None of us will ever adopt practices that directly or indirectly promote money laundering or terrorist financing.

ENVIRONMENTAL PROTECTION

The environment is a primary asset that we are committed to safeguarding; to this end, we are committed to reducing the environmental impact of our activities, as well as preventing risks to the environment not only in compliance with current legislation, but taking into account the development of scientific research and the best experiences in the field.

We work to protect the environment in all our activities, using processes, technologies and materials that allow the reduction of energy consumption and natural resources, avoiding or limiting the impacts deriving from company activities in terms of pollution, greenhouse gas emissions, waste production and inconvenience for local communities.

We promote environmental awareness and training activities within our company.

SAFETY AND HEALTH IN THE WORKPLACE

Protecting the health and safety of workers is a primary value for us.

We are committed to spreading and consolidating a culture of safety and health, developing awareness of risks, promoting responsible behavior by all workers.

Furthermore, we aim to maintain the highest levels of safety and health protection for our workers, and to guarantee the necessary prevention and protection measures, to avoid or minimize professional risks.

All recipients of our Code of Ethics, regardless of their role, are called upon to recognize the risks and to contribute to maintaining a healthy and safe work environment in which they operate, ensuring the safety of their colleagues and collaborators, through active participation in the management of safety and health.

We are committed to spreading the culture of health and safety in the workplace towards Zero Accidents, involving all staff in information and training activities and more generally in the management system.

COMPLIANCE WITH THE LAWS AND REGULATIONS IN FORCE IN THE COUNTRIES IN WHICH WE OPERATE

We consider compliance with the laws and regulations in force in all the countries in which we operate as a binding and essential condition of our actions. Therefore, we strive to comply with these regulations as well as generally recognized practices. At Al Ti Color we firmly believe in compliance with the law and, for this reason, in no case can the pursuit of business interests justify conduct contrary to the laws in force and the rules reported here.

Since the contents of national legislation may differ from each other, we intend to recognize some fundamental ethical principles, shared at an international level. In particular, we are committed to respecting the ten Principles of the UN Global Compact, i.e. the principles that the United Nations recommend to companies in terms of human and workers' rights, respect for the environment and the fight against

corruption. These are universally shared principles as they derive from the Universal Declaration of Human Rights, the ILO Declaration, the Rio Declaration and the United Nations Convention against Corruption. We also refuse involvement with entities that carry out illicit activities or are financed with capital from illicit sources.

4. RULES OF CONDUCT IN RELATIONS WITH EMPLOYEES AND INTERNAL COLLABORATORS

PROTECTION OF THE PERSON

We work to ensure working conditions and environments that respect individual dignity and the rules on hygiene and health at work.

We do not tolerate any form of irregular work or abuse of particular types of collaboration, such as to evade the application of the relevant legislation.

We rigorously apply the legislation on privacy and internal rules, guaranteeing the confidentiality of the information in our possession in accordance with the provisions of the law.

We ensure the protection of sensitive information and data contained or stored on computer media through the adoption of security measures suitable for the purpose.

RELATIONSHIPS BETWEEN COLLEAGUES

In the Company, we are all called upon to adopt, towards our colleagues, an attitude based on respect, protection of the dignity of the person and collaboration.

In respecting roles and collaboration, we avoid any form of abuse by the manager and insubordination by the collaborator.

HUMAN RESOURCES MANAGEMENT AND DEVELOPMENT AND EQUAL OPPORTUNITIES

We reserve fair regulatory and remuneration treatment for employees and collaborators based exclusively on merit and competence criteria, without any discrimination in compliance with the agreements and the current legislation.

PROTECTION OF COMPANY ASSETS

It is everyone's responsibility (management, employees and collaborators) to protect the assets and resources of our Company and prevent their fraudulent or improper use, to their advantage or that of third parties.

PROTECTION OF CORPORATE SECRETS

Without prejudice to the transparency of the activities carried out and the information obligations imposed by the provisions in force, everyone at Al Ti Color (management, employees and collaborators) is keen to ensure the confidentiality required by the circumstances for each piece of information learned by reason of their work function.

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We are aware that the information, knowledge and data acquired or processed during our work or through our duties belong to Al Ti Color and cannot be used, communicated or disclosed without specific authorization from the manager in compliance with specific procedures.

ALCOHOL, SMOKING AND DRUGS

We strictly respect the following behaviors:

- We do not possess, consume, offer or give away for any reason narcotics, alcohol or substances with a similar effect, during work performance and in the workplace;
- We do not smoke in the workplace, except in specifically dedicated areas.

PROTECTION OF CORPORATE IMAGE AND REPUTATION

Al Ti Color's image and reputation represent an asset that all of us (management, employees and collaborators) must protect with our behavior in every situation, taking into account the evolution of the social context, technology (e.g. email, Internet, social media) and new tools available. Given the freedom of opinion of each collaborator and the choices made by the Company, everyone's behavior conforms to the protection of Al Ti Color's reputation.

CONFLICTS OF INTEREST

We promptly report to our direct manager or the Company's CEO, and agree on how best to manage it, any situation that involves, or may subsequently involve, a conflict of interest. A conflict of interest occurs when your private interests, personal relationships or outside activities influence or appear to influence the way you carry out your work duties.

5. RULES OF CONDUCT IN RELATIONS WITH SUPPLIERS

IMPARTIALITY AND INDEPENDENCE IN THE SELECTION AND QUALIFICATION OF SUPPLIERS

The selection of suppliers is based on criteria that are as objective as possible and according to transparent methods, as provided for by internal procedures.

Compliance with the principles contained in this Code is a necessary condition for establishing or continuing a commercial relationship.

Internally, we respect the internal procedures for the selection and management of relationships with suppliers and we undertake not to hinder any supplier who possesses the requirements to compete for a given supply.

FAIRNESS IN REALTIONS WITH SUPPLIERS

The purchasing processes are based on indispensable and mutual loyalty, transparency and collaboration.

We pay suppliers a fee commensurate with the performance.

We formalize agreements and orders to suppliers in writing.

When defining the order, we clearly define and share all the information that allows mutual respect of the commitments undertaken, avoiding any misunderstanding.

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By sending the order we ask the supplier to respect the principles of the Code of Ethics of Al Ti Color.
We report to our direct superior, before any negotiation, any personal relationships of employees with suppliers.
We immediately report to our direct superior any attempt to alter normal commercial relationships.

CONFIDENTIALITY

We undertake not to disclose outside information about suppliers that is confidential and strategic in nature, and in turn ask for reciprocal behavior from suppliers.

6. RULES OF CONDUCT IN RELATIONS WITH CUSTOMERS

CUSTOMER SATISFACTION AND RESPECT FOR COMMITMENTS MADE

We orient our business towards the satisfaction and protection of our customers, offering products, services and solutions that best meet their expectations and the agreements made.
For Al Ti Color, safety and health, respect for human rights and the environment are constitutive elements of its offer.

CORRECTNESS AND IMPARTIALITY

We base the contractual relationship on correctness, transparency, truthfulness and fairness.

TRANSPARENCY AND COMPLETENESS OF INFORMATION

We are committed to fully informing customers about the characteristics, functions and prices of treatments and services through clear and non-misleading communications, so that customers can make informed decisions.

DATA PROTECTION AND CUSTOMER CONFIDENTIALITY

We ensure that the information we hold about customers is managed and used in full compliance with the rights of the customer, individuals and current legislation.

FIGHT AGAINST COUNTERFEITING

We are careful to respect intellectual property rights (patents, models, designs, trademarks, etc.), regardless of whether it concerns our Company or third parties.

7. RULES OF CONDUCT IN RELATIONS WITH THE PUBLIC ADMINISTRATION

Relations with the Public Administration are based on respect for the principles of integrity, legality, transparency and impartiality. Contacts in this sense are the responsibility of those specifically and formally appointed by our Company.

Donations in money, grants of goods in kind, directly or indirectly, in favor of public officials and/or public service representatives from which an undue or illicit advantage or interest may arise for our Company are prohibited.

In particular, in relations with the Public Administration it is forbidden to:

promise or grant cash payments for purposes other than institutional ones, directly or through intermediaries;

promise or grant favoritism in the hiring of personnel, in the choice of suppliers of goods and services;

produce false or altered documents and/or data or omit information required also for the purpose of obtaining contributions, subsidies, financing or other disbursements from the State, public bodies or the European Community;

allocate contributions, subsidies, public funding for purposes other than those for which they were obtained;

unauthorized access to Public Administration computer systems to obtain or modify information for the benefit of our Company.

We reject any behavior aimed at obtaining, from the State, the European Communities or another public body, any type of financial disbursement by means of altered or falsified declarations and/or documents or, more generally, by means of artifices or deceptions, including those carried out by means of an information or telematic system, aimed at misleading the granting body.

Al Ti Color, if it deems it appropriate, can support programs of public bodies intended to achieve utilities and benefits for the community, as well as the activities of foundations and associations, always in compliance with current regulations and the principles of the Code of Ethics.

8. RULES OF CONDUCT IN RELATIONS WITH THE COMMUNITY AND THE TERRITORY

RULES OF CONDUCT TOWARDS THE LOCAL COMMUNITY

We are aware of the influence, even indirect, that our activities can have on the general well-being of the community, as well as the importance of social acceptance of the communities in which we operate.

For this reason, we want to invest sustainably, respecting local communities, and support initiatives of cultural and social value in order to maintain a high level of reputation and social acceptance.

We are committed to paying attention to the life of the communities in which we operate and to listening to the requests coming from them.

RULES OF CONDUCT WITH POLITICAL AND TRADE UNION ORGANIZATIONS

Al Ti Color does not make contributions of any kind to political parties, movements, committees, political and trade union organizations and to candidates in elections and refrains from any undue form of pressure on public representatives aimed at procuring advantages for the Company.

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9. RULES OF CONDUCT TOWARDS COMPETITORS

Our activities are strongly oriented to guarantee the principles of free and fair competition, in full compliance with the laws.

We act with the utmost fairness towards competitors, without ever engaging in unfair behavior or behavior that is harmful to their image or reputation, or in violation of their intellectual property.

10. PROTECTION OF COMPANY INFORMATION

- Al Ti Color considers company information to be a very important asset of its business reality, and must be adequately protected: therefore we ensure that any incorrect use or unauthorised disclosure of such information is prosecuted.
- We protect any company information that is not in the public domain, even if there is no express indication of confidentiality.
- Each of us is committed to protecting the company information we access for work reasons, scrupulously adhering to the procedures adopted also in application of the relevant regulatory requirements.
- We treat commercial, technical, accounting, company, employee and organizational data and information with the utmost confidentiality as they are confidential; they cannot be used for purposes other than those for which they are intended.
- We strictly respect the prohibition to make public, transmit, share and deliver to third parties or in any case to anyone external to Al Ti Color, without the prior consent of the company management and the customers themselves, any company information, such as, by way of example and not limited to: customer lists, prices and turnover, current results and forecasts, commercial agreements, contracts and contractual documents, offers, recipes, methods and processes, techniques, details relating to customers and suppliers, conditions, prices and any other commercial information.
- We request prior authorization from management to communicate with public authorities and the media.

11. COMPLIANCE WITH THE CODE

Al Ti Color requires all Recipients of the Code to conduct themselves in line with the general principles of the same. It is therefore mandatory for all Recipients of the Code to refrain from any behavior contrary to the principles contained therein.

We also require that all Recipients of the Code of Ethics, including collaborators, promptly report through the methods in use any violation of this Code of Ethics of which they become aware.

A suggestion box is available for anonymous reports.

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Violation of the principles and contents of the Code may constitute a breach of the primary obligations of the employment and/or contractual relationship, with the possibility of imposing sanctions on those responsible in accordance with the methods provided for by law, collective agreements, contracts.