

## ETHICAL CODE

Sigroup International Srl announces its internal and external operations in accordance with this Code in the belief that success can not be separated from ethics in business conduct.

Directors, Executives, Employees, Auditors, Collaborators, Consultants, Suppliers, Distributors and in general all those who act on behalf of or in favor of Sigroup International, or who enter into business relations with each other, each within their own functions and responsibilities, are called to respect the principles and provisions contained in this Model.

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### PRINCIPLES OF BEHAVIOR

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Integrity, transparency, honesty, fairness, as well as compliance with all applicable mandatory regulations, are the foundations on which all Sigroup activities are based.

In particular, Sigroup:

- pursues excellence and competitiveness in the market, offering its customers quality products and services that effectively meet the quality standards defined in the business plan, with specific reference to the self-control plan and the safety plan;
- aims to positively contribute to sustainable development by directing the company's choices towards solutions to reduce the direct and indirect environmental impact of its activities;
- assures all employees full transparency on own actions, without prejudice to the need for confidentiality in running own businesses and safeguard the competitiveness of business; for these reasons all the Recipients of this Model must ensure the utmost confidentiality on the information acquired or processed in operation or in the performance of their functions;
- undertakes to promote fair competition, an essential element for the pursuit of its own interest, as well as a guarantee for all market operators, for customers, for its shareholders and for holders of patents granted under license to Sigroup;
- avoids and stigmatizes the use of illegitimate or otherwise incorrect behavior in order to achieve the economic objectives it has set itself, which are pursued exclusively with the excellence of performance in terms of innovation, quality, economic, social and environmental sustainability;
- protects and enhances its human resources on which it relies;
- pursues the principle of equal opportunities in the workplace, regardless of sex, marital status, sexual orientation, religion, political opinion or union affiliation, skin color, ethnic origin, nationality, age, or disability;
- pursues and supports the protection of internationally proclaimed human rights;

- employs resources responsibly, in line with the objective of achieving sustainable development, respecting the environment and the rights of future generations;
- does not tolerate any kind of corruption against any party, in any form or manner, in any jurisdiction, even where such mode is admissible in practice, tolerated or not prosecuted;
- protects corporate assets, also by providing tools to prevent phenomena of embezzlement, theft and fraud against Sigroup;
- stigmatizes the pursuit of personal interests and / or third parties to the detriment of social interests;
- as active and responsible member of the communities in which it operates, Sigroup is committed to respect and enforce internally and in relations with the outside world the laws in force in the States in which it carries out its business;
- implements organizational tools to prevent the violation of rules and the principles of transparency, correctness and loyalty of its employees and collaborators and supervises their compliance and concrete implementation.

#### Internal monitoring systems

The effectiveness and efficiency of internal monitoring systems are an indispensable condition for carrying out Sigroup's activities in line with the rules and principles of this Model.

Internal monitoring systems refer to the set of tools, activities, processes and organizational structures, including the Sigroup document system, aimed at ensuring the following objectives of:

- effectiveness and efficiency of company activities, also ensuring the traceability of acts and decisions;
- the reliability of accounting and management information;
- compliance with laws and regulations;
- the effectiveness and efficiency of Security Plan pursuant to Legislative Decree 81/08 and subsequent amendments;
- the effectiveness and efficiency of Quality Manual;
- the effectiveness and efficiency of Self-Control Plan (Viva and WDrink products);
- the effectiveness and efficiency of Quality Assurance System (appliances);
- safeguarding the integrity of company assets, even against possible fraud.

To this end, all the Recipients of this Model are called to contribute to the continuous improvement of internal monitoring systems.

The persons in charge of control, supervision and surveillance, internal or external, in the performance of their activities and for what is within their competence, have complete access to all persons, activities, operations, documents and company archives guaranteeing the obligation of confidentiality on all acquired information, especially on sensitive ones.

#### Shareholders, patent holders and the financial community

Sigroup's dialogue and relations with shareholders, patent holders and the financial community in general, are based on the utmost transparency, in compliance with the principles of accuracy, timeliness, with the aim of promoting fair valuation of Sigroup assets.

#### Human resources

Sigroup recognizes the centrality of human resources in the belief that the key to success in any business is the professional contribution of people operating in a climate of fairness and mutual trust.

Sigroup protects health, safety and hygiene in the workplace, both through the implementation of internal monitoring systems, and by encouraging all personnel to report and / or propose improvement actions in order to foster a culture of safety and health based on the logic of prevention and the need to effectively manage occupational hazards.

Sigroup also believes that respect for workers' rights is essential in carrying out company activities.

The management of labor relations is aimed at ensuring equal opportunities, to promote the personal growth of each and to enhance the diversity, to the benefit of a harmonious and serene working environment.

#### Environment

Sigroup manages its activities respecting the environment and public health. The investment and business choices are oriented towards environmental sustainability, with a view to eco-compatible growth, also through the adoption of particular technologies and production methods that reduce the environmental impact.

#### Customers and distributors

Sigroup bases the excellence of products and services offered on constant innovation, with the aim of anticipating the needs of its customers / distributors and meet their demands with an immediate, effective response, with imprinted on fairness, courtesy and utmost cooperation.

#### Suppliers and external collaborators

Suppliers and external collaborators play a decisive role in improving the overall competitiveness of the company.

Sigroup's relations with them, in pursuit of maximum competitive advantage, are based on loyalty and transparency, especially regarding the technical documentation and declarations of conformity required by the company, as well as compliance with all economic and provision agreed.

Sigroup requires its suppliers and external collaborators to respect and apply the principles and provisions contained in this Model.

### External Community

#### Sigroup:

- maintains relations with local, national and international public authorities inspired by the full and effective collaboration, transparency, respect for the reciprocal autonomy and values contained in the Model;
- intends to contribute to the economic well-being and growth of the communities in which it operates by providing efficient and technologically advanced products and services;
- welcomes and, if possible, provides support for social, cultural and educational initiatives geared to promoting the individual and improving his / her living conditions;
- does not provides contributions, advantages or other benefits to political parties, workers' trade unions, or their representatives or candidates.

### Competitors

Sigroup recognizes that proper and fair competition is a fundamental element for the development of the company and the market and manages its activities by promoting an innovation-based competition, quality and performance of its products. The company, all employees and distributors who market our products must refrain from unfair commercial practices and, for no reason, the conviction of acting for the benefit of Sigroup can justify the adoption of conduct contrary to these principles.

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## *COMPLIANCE WITH THE CODE*

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Sigroup requires all the Recipients of the Code to behave in line with the principles enunciated in the same.

It is therefore obligatory for all Recipients of the Code to refrain from any conduct contrary to the principles contained therein.

The violation of the principles and contents of the Model may constitute a breach of the primary obligations of the employment and / or contractual relationship, with the possibility of adopting, against those responsible, sanctions in the manner prescribed by laws, collective agreements, contracts.