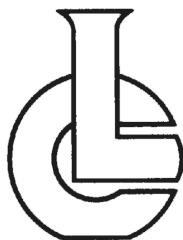


Internal Code of Ethics

LUSOCHIMICA S.P.A.



28th March 2014

Document Control

Document Title	Internal Code of Ethics, Lusochemica S.p.a.
Version No.	02
Document Code	MOGC_CET_LUC_EN
Approval Date	28 th March 2014

CONTENTS

PREMISE

CONTENTS	3
PREMISE	3
I. Introduction	5
I1 The LUSOCHIMICA model and the purpose of the Code of Ethics	7
I2 Persons subject to the Code of Ethics	7
I3 Communication and training on the Code of Ethics	8
I4 Structure of the Code of Ethics	9
II. Reference ethical principles.....	9
II.1 Responsibilities and compliance with law	10
II.2 Moral values.....	10
II.3 Impartiality.....	11
II.4 Honesty	11
II.5 Integrity.....	12
II.6 Transparency	12
II.7 Efficiency	13
II.8 Service quality	13
II.9 Responsibilities with regard to clients	13
II.10 Responsibilities with regard to suppliers	14
II.11 Fair competition	14
II.12 Protection of personal data and relations with Personal Data Protection Officer ...	14
II.13 Service philosophy	15
II.14 The value of human resources.....	15
II.15 Respect for legal provisions regarding worker visas	16
II.16 Relations with public and local institutions	16
II.17 Health and safety in the workplace and at the laboratories.....	18
II.18 Environmental protection.....	19
II.19 Relations with associations, trustee organizations and political parties.....	21
II.20 Relations with international operators.....	21
II.21 Protection of individual character	21
II.22 Protection of company capital and creditors	21
II.23 Accounting checks and transparency	22
II.24 Transparency of commercial transactions	23
II.25 Repudiation of Criminal Organizations	23
II.26 Protection of Industrial and Intellectual Property Rights.....	23
II.27 Cooperation with the Authorities in Case of Investigations	24
II.28 Proper Use of Information Systems	24
II.29 Internal Control	25
III. Standards of Behavior	25
III.1 Standards of Behavior for Members of Company Bodies.....	25
III.2 Standards of Behavior for Staff	26
III.2.a) Conflicts of Interest	28
III.2.b) Relations with Public Authorities.....	28
III.2.c) Relations with Clients.....	29

III.2.d) Relations with Suppliers.....	30
III.2.e) Obligation to Remain Up to Date.....	30
III.2.f) Confidentiality	30
III.2.g) Due Diligence in the Use of the Company's Goods.....	31
III.2.h) Respect for Regulations on Illegal Immigration	31
III.2.i) Care for Health and Safety at the Workplace	32
III.2.j) Care for the Environment.....	34
III.2.k) Care for the Company's Capital and Creditors.....	35
III.2.l) Measures Against Money Laundering	36
III.2.m) Protection of Industrial and Intellectual Property Rights.....	36
III.2.n) Use of Information Systems	37
III.2.o) Protection of Personal Data and Relations with the Italian Data Protection Authority.....	37
III.3 Standards of Behavior for Third-party Recipients	38
III.4 Obligation to Inform the Supervisory Board.....	38
IV. Implementation and Inspection of Respect for the Code of Ethics.....	40
IV.1 Duties of the Supervisory Board.....	40
IV.2 Violations of the Code of Ethics and Respective Penalties	41
IV.3 Notification of Any Violation of the Code of Ethics	41

I Introduction

LUSOCHIMICA s.p.a. (henceforth the "Company" or LUSOCHIMICA) is a Company belonging to the MENARINI Group. Its registered address is Via Giotto n.9, Lomagna.

MENARINI is an international industrial group operating primarily in the pharmaceutical and diagnostics sectors, which, by virtue of its size, links and importance within the sectors in which it operates, plays a significant role in society.

With over three billion in consolidated turnover and around sixteen thousand employees, the MENARINI Group and its products are present in over 100 countries across the world and five of its researchers are among the world's most cited on a global scale. MENARINI research concentrates on as yet unresolved pathologies in the field of oncology, cardiovascular medicine and pain-inflammation-asthma, with a particular focus on rare diseases.

The multiplicity of socio-economic interests and contexts with which the company interacts, alongside the Group's organizational structure, means that we all have to work together to ensure that the Company's activities are carried out in concordance with the law, in the context of fair competition and with honesty, integrity, propriety and in good faith, respecting the legitimate interests of clients, employees, business and financial partners, as well as those of the collectives in which the Company and its activities are present.

LUSOCHIMICA is a chemicals Company which produces the active ingredients for pharmaceutical products.

It is set up in two areas: Pisa and Lomagna.

The quality of the production process is ensured by (in addition to publicly required Company functions) Quality Control and Quality Assurance, as well as Company structures designed to support production, such as Industrial Management, Engineering and in-house staff.

Our production processes rigorously comply with *Good Manufacturing Practices* (GMP).

The LUSOCHIMICA Company Policy is designed to achieve the following objectives:

- ensuring avant-garde technology in active ingredient production to ensure the absolute safety of medications;
- integrated Company development to offer organic responses to client requests and fulfil our business potential;
- constant attention to technological innovation designed to ensure full respect of Environmental Protection and Health and Safety regulations at our laboratories and to improve services;
- continual improvement of quality and efficiency standards understood as a key element in respecting Environmental and Health and Safety regulations at our laboratories and amongst competitors.

This Policy is communicated to all staff through appropriate communication measures and awareness-raising within Company premises to ensure it is seen.

The present Code of Ethics includes all the principles and behavioral regulations to which

all persons working for the Company or in the context of its activities are subject. Hence all Partners, Administrators, Trustees, Auditors, Managers, Employees and Third Parties (including Group Companies with specific activities such as outsourcing, consultants, agents, service providers, contractors, and registered doctors) must keep to these principles when carrying out their tasks and responsibilities.

It is thus important to reiterate to all staff working at the Company or in the service of its objectives, with no distinctions or exceptions, the importance of observing these principles and ensuring their observance in the context of their functions and responsibilities.

Fully aware that manufacturing Companies are evaluated not only in terms of the quality of the service provided, but also based on their ability to conform to absolute ethical values, formalized by laws and regulations, LUSOCHIMICA's intention in adopting its own Code of Ethics was to:

- define and render explicit the values and principles that inform our activity and relations with Corporate Bodies, Staff and anyone collaborating with or related to the Company, e.g. partners, clients, suppliers, institutions, contractors and third parties in general;
- formalize our commitment to behave with integrity, loyalty and upstanding values;
- indicate the behavioral principles, values and responsibilities to our own partners that are to be respected in the exercising of their respective roles.

Specifically, the Company hopes to inspire behaviors characteristic of integrity, a value which is not only moral in nature, but which is of fundamental importance to ensure continuance of the Company's activity in concordance with the provisions of Italian Legislative Decree 231/01.

The fulfilment of this objective requires absolute respect of applicable Italian and regional laws, European directives and international laws, as well as concordance with the principles of fair competition, honorable behavior and good faith, while fully respecting the legitimate interests of all stakeholders: clients, partners, citizens, employees, doctors, healthcare staff, patients, suppliers, business partners etc.

Specifically, to this end, LUSOCHIMICA:

- acts with transparency and respects behavioral models based on autonomy, moral integrity and professional rigor, always acting in a coherent manner;
- observes applicable regulations at the municipality, national, regional and international level;
- observes international *Good Manufacturing Practices* (GMP);
- respects the legitimate interests of clients, suppliers, Staff and third parties;
- complies with the principles contained in the present Code of Ethics.

Respect for company ethics is fundamental for the organization of the Company and relations between Staff and all other individuals working with the Company in various capacities, as well as between Staff and the general public.

Respect for the Company's ethics also helps to render the monitoring policies and systems developed by the Company effective, as well as influencing and directing

behaviors that may escape the monitoring system.

Lastly, respect for the Company's ethics represents a guarantee of behaviors that, as well as respecting the law, also respects upstanding values, equity and transparency with regard to employees and the Company's various contacts.

Observance of the present Code of Ethics is thus of fundamental importance for the favorable functioning, trustworthiness and reputation of the Company, as well as serving to avoid the involvement of Corporate Bodies, Managers or Employees in any illegal activities.

Under no circumstances may a belief that one is acting in the Company's interests justify behaviors contrasting with these principles or the procedures governing the Company's activities.

The guidance contained in the Code of Ethics is designed to protect LUSOCHIMICA's prestige and credibility with regard to the State, public opinion and clients.

LUSOCHIMICA ensures maximum visibility and awareness of the present Code of Ethics both within and outside the Company.

The LUSOCHIMICA Code of Ethics has been approved by the Board of Administrators via the ruling dated 3.28.14.

I1 The LUSOCHIMICA model and the purpose of the Code of Ethics

The Code of Ethics adopted by LUSOCHIMICA forms an integral part of our Company policies, including, amongst other things, the general principles and behavioral rules considered ethically positive, to which all persons subject to the code are to conform.

The LUSOCHIMICA Code of Ethics complies with the principles indicated in the CONFINDUSTRIA Guidelines.

I2 Persons subject to the Code of Ethics

Since the key purpose of the Code of Ethics is to orient and direct us in terms of the ethical principles associated with the Company's activities, it is binding with regard to Partners, Administrators, Trustees, Auditors and all Employees, including Managers (henceforth referred to as Staff), as well as all persons who, though not Company employees, operate on behalf of same either directly or indirectly e.g. Group Companies with specific activities such as outsourcing, agents, partners of any kind, consultants, suppliers, business partners, contractors and licensed doctors (henceforth referred to as Third Parties subject to the Code).

All the Persons subject to the Code are required to observe (in terms of their own competencies) and ensure observance of the principles contained in the Code of Ethics.

Company Management is required to observe the content of the Code by suggesting and

overseeing projects, activities and investments likely to increase the Company's long-term economic value as well as the well-being of its employees, clients, suppliers and the community in general.

It is the responsibility of all, but particularly Administrators and Managers, to promote the values and the principles contained in the Code, and to take responsibility for the same both internally and externally and strengthen faith in the Company, its cohesiveness and team spirit, notwithstanding the Company's operational autonomy.

All company employees must ensure that they respect applicable laws and regulations. Employees must be aware of applicable rules and behaviors implemented to respect said laws. Each employee is required to actively contribute to the fulfilment of the Code.

Under no circumstances may the claim of acting in the Company's interests justify the adoption of behaviors not complying with those stated in the present document.

Furthermore, and above all, observance of the regulations of the Code must be considered an integral part of Company employees' contractual obligations as per the provisions of Art. 2104 et seq. of the Italian Code of Civil Procedure.

The violation of the regulations set out in this Code is considered a particularly severe infraction and harms the climate of faith set up with the Company. It may lead to disciplinary actions and pursuit of damages.

Notwithstanding the respect of those procedures referred to under Art. 7 of the Italian Workers' Statute, collective labor agreements and other Company regulations.

I3 Communication and training on the Code of Ethics

The Company undertakes to ensure prompt communication of the Code of Ethics both internally and externally.

With specific reference to all Corporate Bodies and Staff, it will ensure:

- distribution of the Code of Ethics to all Corporate Bodies and all staff;
- the display of the code within the head offices in locations that are accessible to all, so that Staff may verify news of Code violations as well as the evaluation of events and the application of appropriate sanctions in the event of said violations;
- assistance in the interpretation and clarification of the provisions of the Code;
- the development of verification systems with regard to the effective observance of the Code of Ethics.

The Supervisory Board as per Italian Legislative Decree 231/01 (henceforth SB) responsible for verifying the effective fulfilment of company policies promotes and monitors training initiatives on the principles of the Code of Ethics run by an external Working Group. These initiatives will have a variety of structures and will differ depending on the role and responsibilities of the Staff in question. Training will be more intense and in-depth for individuals defined as 'top level,' as well as those operating in 'high risk' areas as defined within Company policies.

With specific reference to Third Parties subject to the Code and all other individuals involved with the Company, the Company will also:

- inform such persons with regard to their responsibilities as per the Code of Ethics, by providing them with a copy of the same;
- communicate the Code via the Company's IT systems;
- require them to respect the Code of Ethics;
- have them undersign clauses and/or declarations (third party subjection clauses) contained in and/or associated with their contracts, with a view to formalizing the requirement to respect the Code of Ethics and the possibility of being sanctioned by the Company in the event of violation of the regulations detailed therein. Those sanctions to which such third parties are subject consist of an injunction to respect the Code of Ethics, the application of a fine to be given to charity or rescindment of their contract. The definition and ongoing improvement of such clauses shall fall within the remit of the Managers of the department in question or through suggestions from the SB;
- possibly adopting *ipso jure* contractual resolutions for when Third parties subject to the Code, in the context of their activities, fail to comply with the ethical regulations as per the provisions of the third party subjection clauses.

Any doubts with regard to application of the Code are to be promptly discussed with the SB.

I4 Structure of the Code of Ethics

The Code of Ethics is essentially made up of three parts:

- the first part outlines the relevant ethical principles, that is, the values considered relevant by LUSOCHIMICA in the context of its business activities and which are to be respected by all Persons subject to the Code;
- the second part outlines the behavioral regulations and principles applicable to persons subject to the Code, including Third Parties also are required to comply with the Code;
- the third part details the means through which the SB will ensure the observance and monitoring of respect of the Code of Ethics.

The Code of Ethics is subject to ongoing modifications, integrations and implementations. The Board of Administrators is the body responsible for making such modifications which are to be introduced through specific board deliberations, as well as being adopted based on suggestions or indications from the SB.

II. Reference ethical principles

Below, the reference ethical principles for all the Persons subject to the Code are

defined. It should be noted that under no circumstances may a belief that one is acting in the best interests of LUSOCHIMICA justify behaviors that contrast with the principles of this Code, which are to be seen as primary and absolute values.

II.1 Responsibilities and compliance with law

LUSOCHIMICA undertakes to respect all laws, regulations and applicable guidelines in general.

LUSOCHIMICA's Administrators, Trustees, Auditors and Staff are required to respect regulations applicable in Italy. In respecting applicable regulations and procedures established by the Company, the latter are to carry out their roles with diligence, efficiency and upstanding values, always maintaining professionalism and taking on those responsibilities falling within their role's remit.

Under no circumstances is it acceptable to pursue or provide for the Company's interests in violation of laws or deontological principles. This applies equally to activities carried out on Italian territory and those related to relations with international operators.

II.2 Moral values

All activities relating to operations carried out by, and behaviors enacted by, all Persons subject to the present Code in fulfilling their function or responsibilities are inspired by legitimacy in terms of its formal and constituent elements in line with applicable regulations and internal procedures as well as moral values, loyalty and mutual respect.

All Persons subject to the Code are required to diligently respect all applicable laws, the Code and internal regulations. Under no circumstances can the pursuit of LUSOCHIMICA's interests justify dishonest conduct or failure to comply with regulations or the present Code.

The pursuit of profits is subordinate to moral integrity.

All Persons subject to the Code are not to accept nor perform, on their own behalf or that of others, any actions, recommendations or indications which may harm the company or reap undue rewards for themselves, for the Company or for Third parties. Persons subject to the Code are also to reject and not make undue promises and/or offers of money or other benefits, unless they are commercial in nature, modest in value and do not correspond to any kind of demands.

If Persons subject to the Code receive offers or requests for benefits from third parties, then they must not accept said offers or adhere to said requests and are to immediately inform the SB of the occurrence, unless these are commercial in nature and modest in value.

Administrators, Trustees, Auditors and other LUSOCHIMICA Staff must always act in an

upstanding manner with a view to avoiding conflicts of interests, understood as situations in which the pursuit of one's own interests or those of a spouse or family member is not consistent with pursuit of the Company's interests.

Administrators, Trustees, Auditors, Employees and any other Persons subject to the Code of Ethics are required to flag up any potential conflicts of interests to the SB or their direct superior.

In any case, all situations in which Employees, Administrators or other Persons subject to the Code will gain undue advantages or profits by virtue of opportunities of which they have become aware in the context of performing their work role.

Specifically, given the delicate and central nature of their role, Administrators and Managers are expected to show:

- behavior manifesting autonomy and independence with regard to public institutions, individuals, economic associations and political bodies, providing correct information in terms of the Company's legal configuration and administrative activities;
- behavior manifesting integrity, loyalty and a sense of responsibility with regard to the Company;
- avoidance of conflicts of interest on their own account or that of family members or spouses;
- hard-working and well-informed participation in Company activities;
- awareness of their role;
- pursuit of our objective of guaranteeing avant-garde level technology in active ingredient production

II.3 Impartiality

LUSOCHIMICA condemns and distances itself from discrimination based on gender, nationality, religion, personal and political opinions, age, health or economic status of all contacts, including suppliers.

II.4 Honesty

Administrators, Trustees, Auditors and LUSOCHIMICA Staff in general, as well as Third Parties subject to the Code, are to ensure they have an accurate understanding of the ethical and deontological significance of their actions and are not to pursue personal or Company gain in violation of applicable law or regulations of the Code of Ethics.

When formulating contractual agreements with clients, it is necessary to ensure that all clauses are as clear and easily understood as possible. It is also important to ensure fair representation of the parties.

II.5 Integrity

LUSOCHIMICA condemns and will not allow any acts of violence or threats, even psychological, intended to force behaviors that are not compliant with applicable regulations, including the deontological principles within the present Code.

II.6 Transparency

Information communicated both internally and externally must be true, accurate and complete. Constant respect of this regulation will allow for the fulfilment of the principle of transparency.

By respecting transparency, all operations and/or transactions, in the broadest sense of the term, must be legitimate, authorized, coherent, congruent, documented, recorded and verifiable over a ten year time-frame. Specifically, all operations and/or transactions must be appropriately recorded and allow for verification of the decision-making, authorization and implementation process.

All operations must also be backed up by appropriate document-based support so as to allow for the carrying out of checks attesting the operation's characteristics and motivations at any time, as well as allowing for the identification of the person responsible for the authorization, carrying out, recording and verification of same.

Persons subject to the Code, and, more generally, all persons carrying out any acquisition of goods and/or services, including consultancy, on the Company's behalf, must act in concordance with the principles of upright moral values, economic principles, quality and legitimacy and must diligently take responsibility for their actions.

With a view to ensuring the respect of such ethical principles, the selection criteria for suppliers must be objective and transparent. Said selections must respect applicable law and set protocols and are to be based on objective evaluations of the commercial reliability, professional honor, economic/financial trustworthiness, competitiveness and quality of the services offered and relevant economic conditions.

Suppliers must also be selected in view of their ability to guarantee:

- respect for the present Code of Ethics;
- enactment of appropriate quality systems;
- availability of appropriate organizational means and structures;
- respect for labor regulations.

Appropriate procedures are in place to guarantee documentation of the entire selection and purchase processes with a view towards ensuring maximum transparency of supplier evaluation and selection processes.

II.7 Efficiency

All Persons subject to the present Code are required to show professionalism, dedication, loyalty, team spirit and mutual respect. Efficient management at LUSOCHIMICA is achieved through the professional and organizational contribution of all human resources to ensure the respect of the principles of professionalism, transparency, upstanding moral values and honesty.

Efficient management is also achieved by constantly respecting the highest quality standards, which are to be maintained even where this entails less economical management.

LUSOCHIMICA also undertakes to safeguard and protect the Company's resources and assets as well as managing its property and capital with all necessary caution to ensure full respect of all applicable laws and regulations.

II.8 Service quality

Quality is considered a fundamental and absolute value for the organization's success. The Company's activities must thus ensure uninterrupted and regular service, with standardized processes for all users, polite behavior on the part of Staff, improved service efficiency, reduced environmental impact due to active ingredient production and the use of top quality raw materials.

The Company has implemented a Quality Management System compliant with UNI EN ISO 9001:2008 regulations, which includes production site management and all management processes.

II.9 Responsibilities with regard to clients

LUSOCHIMICA's business activity and purpose are such that the Company assumes specific responsibilities, including ethical ones, in relation to its clients.

In order to enact and optimally respect our ethical commitment with regard to clients, LUSOCHIMICA undertakes to use top level quality and technology in its activities.

Specifically, it undertakes to:

- ensure outstanding quality standards in the production of active ingredients;
- ensure outstanding quality standards in the selection and purchase of raw materials;
- ensure that production is compliant with the highest scientific standards.

Behavior styles with regard to clients and working relationships are to show the highest level of professionalism.

In line with the principles of impartiality and equal opportunities, the Company undertakes not to discriminate amongst its clients, to provide products and services of the utmost

quality to satisfy reasonable expectations among clients as well as protecting their safety. It also undertakes to avoid using advertising or commercial communication or of any other kind.

II.10 Responsibilities with regard to suppliers

The Company sets up its relationships with suppliers not only with the competitive nature of their services in mind, but also in view of ensuring equal opportunities, upstanding moral values, impartiality and equity.

Our supplier selection criteria are based on our assessment of their quality standards, their professional and technical suitability and their trustworthiness and ethical values. The selection process does not allow for undue pressure intended to favor one supplier over another, which would detract from the market's trust in the Company in terms of transparency and the rigorous application of law and Company procedures.

II.11 Fair competition

The free market requires fair competition with other manufacturing companies, which must always be in keeping with the principles of upstanding moral values, fair competition and transparency with regard to the operators present on the market.

The Company will not engage in behaviors nor sign agreements with the potential to negatively impact upon fair competition between the various market operators or to compromise users and consumers in general, basing its behaviors on commercial loyalty and preventing and condemning practices of any other kind.

It is against both Company Policy and the law to set up agreements, understandings, information exchanges, discussion or communication with any competitors with regard to prices, pricing policies, discounts, promotions, sales conditions, markets or production costs, when these are intended to restrict or falsify free competition.

With a view to preventing this kind of activity, Staff are required to respect the absolute confidentiality of sensitive data.

LUSOCHIMICA also undertakes not to unduly harm the image of competitors or their products.

II.12 Protection of personal data and relations with Personal Data Protection Officer

LUSOCHIMICA protects the privacy of its Administrators, Trustees, Auditors and other Staff, as well as that of Third Parties subject to the Code in full respect of applicable regulations with a view to avoiding the communication or divulgation of personal data without the consent of the person in question.

The acquisition, processing and storage of employees' information and personal data as well as that of other persons in the Company's possession is run in line with procedures designed to ensure that unauthorized persons and/or entities do not access the said data. These procedures are compliant with applicable regulations.

The Company undertakes to maintain upstanding moral values in terms of its relationship with the Officer for the Protection of Personal Data, undertaking to gain the necessary authorizations for the processing of sensitive data, in terms of guidance on data processing modalities or prohibitions regarding data processing and with regard to information or document submission requests, access or verification requests or other procedures supported by said authority.

II.13 Service philosophy

Administrators, Trustees, Auditors and other Staff, as well as Third Parties subject to the Code, must ensure their conduct is restricted to their respective competencies and responsibilities in pursuit of the Company's principal objectives intended to provide a high-value service that is useful to society in general, which must thus subscribe to and benefit from the strictest of quality standards.

II.14 The value of human resources

Human resources represent the most important factor in terms of the Company's development. Human resources management is founded upon the respect for each person's character and professionalism within the general framework of current regulations.

LUSOCHIMICA is aware that the professionalism of its partners and their dedication with regard to the Company are essential and determining factors in terms of the Company's pursuit of its objectives.

For this reason, the Company fosters growth and functional professional development with a view towards boosting knowledge and competencies while respecting applicable regulations in terms of individual rights, with a specific focus on the moral and physical integrity of Staff.

LUSOCHIMICA condemns all forms of nepotism and clientelism.

Staff are selected based on candidate profiles and their competencies with regard to the role to be fulfilled and in full respect of the ethical principles required by the Company.

Specifically, Staff are hired following a selection process based on the curriculum vitae of each candidate. As regards Managers, specific attention is paid to professional experience, knowledge of foreign languages, interpersonal and managerial skills, as well as the candidate's attitude with regard to the principles detailed here. With regard to employees, special attention is paid to technical/scientific background, interpersonal skills, moral integrity and their ability to respect the principles outlined here. Specifically, LUSOCHIMICA guarantees the creation of opportunities for development and professional growth through training and the availability of appropriate information tools.

Staff enter into standard employment contracts with the Company.

The Company undertakes to ensure that the organization's annual objectives will not encourage illicit behaviors and that they are instead focused on feasible, specific, concrete and measurable results correlated with the time invested in their achievement.

Pay rises or other incentivization tools and access to more senior posts, over and above regulations stipulated by law or collective labor agreements, are associated with employees' individual merits, including their ability to achieve Company objectives through behaviors and competencies exemplifying the Company's ethical principles, as indicated in the present Code.

II.15 Respect for legal provisions regarding worker visas

LUSOCHIMICA always places the protection of its employees over any economic advantage.

Among the Company's specific duties is that of verifying that workers from foreign countries have an up-to-date visa at the time of hiring and that, should it have expired, they arrange to have it renewed. It also ensures that the third parties it works with (contractors, consultants, etc.) make use of workers in concordance with regulations on work permits.

Should the Company make use of agency-sourced temporary workers, it will also ensure that the agency workers are compliant with work permit registrations.

II.16 Relations with public and local institutions

LUSOCHIMICA's objective is to maintain integrity and upstanding moral values in terms of its relations with public institutions and with the State Administration more generally, with a view towards ensuring maximum transparency in its relationships with different institutions.

In terms of its relationships with civil servants and 'politically visible individuals' or with their family members or 'closely linked persons', as defined in Italian legislative decree 231/07, Administrators and Managers must maintain upstanding moral values and integrity, avoiding even giving the impression of wishing to inappropriately influence decision-making or request favorable treatment.

Illicit payments in the context of relations with Public Institutions or civil servants are forbidden, including payments to their family members or other closely related individuals. All Persons subject to the Code must avoid making any form of payment to any institution in view of gaining illicit benefits in terms of the Company's representation and with regard to the Public Administration.

The Company expressly forbids all forms of corruption, favoritism, collusive behaviors,

direct or indirect solicitation, including promises of personal advantages with regard to any member of the Public Administration.

Specifically, the following behaviors are forbidden:

- directly or indirectly offering payments or material benefits to any official public institution responsible for any aspect of public service, to politically visible individuals, their family members or any other individuals closely or publicly related to same, in view of influencing or compensating an act in the context of their responsibilities and/or the omission of same;
- offer gifts or other advantages liable to constitute forms of payment to civil servants or employees of the Public Administration, to politically visible individuals, their family members and any other persons closely or publicly associated with same;
- collecting and thus accepting requests for money, favors or services from physical or legal persons intending to enter into a business relationship with
- LUSOCHIMICA or from any members of the Public Administration, politically visible individuals, their family members and any other persons closely or publicly associated with same.

Courtesies such as gifts are only allowed when modest in value and not liable to compromise the integrity or reputation of either party and such that they could not be interpreted as intended to gain improper advantages by an impartial observer.

The Company also forbids relationships between individual members, acts of corruption, favoritism, collusion and direct or indirect solicitation including in the form of promises of personal advantages.

Notwithstanding all obligations imposed by applicable regulations, all Persons subject to the Code, in the context of their business activities, are to abstain from entering into commercial relationships with, or engaging in requests with, Public Institutions, civil servants, politically visible individuals, their family members or persons closely associated with same, and are to avoid the following actions:

- considering or suggesting employment and/or commercial opportunities with the potential to benefit employees of Public Institutions or Civil servants;
- offer or otherwise provide, accept or encourage gifts, favors or business practices/behaviors not characterized by absolute transparency, upstanding moral values and loyalty or which fail to comply with applicable regulations;
- request or acquire confidential information with the potential to compromise the integrity or reputation of either party or otherwise violate declaration procedures inherent to the maintenance of relations with the Public Administration

Relations with contacts within Public Institutions are to be maintained exclusively for those individuals responsible for such relationships in the context of their professional role.

LUSOCHIMICA will not represent its interests in the context of relations with Public institutions, Civil servants, politically visible individuals, their family members, or other persons closely associated with same, through the actions of its Administrators or Managers

in any manner with the potential to create a conflict of interests.

In this regard, the Company forbids the appointment of any of its own representatives likely to enter into a conflict of interest or with family or other close relationships with the potential to illicitly influence the decision-making of any member of the Public Administration or any politically visible individual.

LUSOCHIMICA may use consultants, solicitors or other third parties for the purpose of representing its interests with regard to the Public Administration, provided they are authorized in advance to carry out such operations and on a case by case basis.

II.17 Health and safety in the workplace and at the laboratories

LUSOCHIMICA undertakes to provide working environments suitable for protecting the health and safety and physical and mental wellbeing of its employees and partners in line with applicable laws and regulations and specifically with a view to preventing those crimes detailed under Articles 589 and 590, comma three, of the Italian Penal Code (manslaughter and grievous bodily harm), committed through the violation of anti-accident regulations and those regarding health and safety in the workplace.

In terms of health and safety in the workplace, decisions of all kinds and at all levels, be they operational or managerial, are to be made and implemented based on the following fundamental principles and criteria:

- adoption of Company governance allowing for a clear distribution of responsibilities, functions and roles;
- adoption of safety governance allowing for the clear identification of Employer, Managers, Leaders, Emergency and First Aid Team Members, Licensed Doctor, Prevention and Protection Department Manager, HSE Compliance Function;
- maintenance and improvement of the structural and organizational conditions allowing for the granting of UNI EN ISO 14001 and BS OHSAS 18001 environmental and safety certifications so as to allow for their renewal;
- provision of appropriate organizational measures designed to ensure the compliance of workplace devices, fittings, machinery and sites with relevant legal provisions, as well as their ongoing maintenance and updates;
- provision of organizational measures designed to ensure the appropriate management and use of workplace devices, fittings and machinery by workers;
- risk assessment and mapping;
- planning of technical and procedural preventative measures aiming to create a cohesive whole integrating technical aspects, workplace organization and conditions, relations with society and the influence of working environment factors;
- adoption of appropriate technical and procedural preventative measures
- production of operational safety procedures (managerial procedures henceforth referred to as POS or SOP) and appropriate operational instructions for workers (safe work procedures henceforth referred to as operational instructions IO);
- providing workers with appropriate personal protective equipment and collective protective measures;
- vigilant application of preventative and protective measures and worker behaviors

- with a view to preventing accidents and work-related disease;
- ongoing compliance checks on working practices and the content of Company procedures adopted by carrying out audits on an internal basis run by the HSE Compliance Function;
- system implementation based on audit findings;
- organization of a suitable and effective health monitoring system;
- set-up of an appropriate and ongoing worker information and training program;
- ongoing checks on the development level of technology used and adoption of subsequent improvements;
- effective organization of organizational activities including emergencies, first aid, periodic safety meetings, consultations between workers and the Workers' Representative for Safety;
- effective coordination with contractors and information provision for same with regard to interferential risks;
- organization of a record-keeping system ensuring the availability of legally required documentation and certifications, as well as the appropriate management of functional documents for the purpose of managing the HSE system;
- tailoring of work to the individually, specifically in terms of the design or work stations and choice of work and production equipment and methods in view of preventing risks associated with (amongst other things) the handling of dangerous substances and chemical agents, thus reducing their effects on workers' health;
- insurance of devices, human resources, specialist and technological competences, as well as financial resources essential to implement and monitor the HSE Management System.

II.18 Environmental protection

LUSOCHIMICA places fundamental importance on environmental protection, such that it will never pursue advantages derived from violation of environmental regulations.

We constantly adhere to guidance from the Integrated Environmental Authorities (IEA) and laws with regard to compliance on emissions and waste regulations as well as those regarding the appropriate disposal of production waste. The Company undertakes to identify industrial solutions with reduced environmental impact.

The Company undertakes to respect all guidance derived from Italian legislative decree 152/06 and applicable environmental regulations.

All of LUSOCHIMICA's business activity is to be carried out in compliance with applicable environmental regulations. The pursuit of advantages for the Company, where these entail the violation of environmental regulations is never justified.

For this reason, the Company has set out and communicated a specific environmental policy based on the following fundamental principles:

- adoption of *Company governance* allowing for a clear distribution of responsibilities, functions and roles;

- adoption of an organizational system allowing for clear identification of the Employer and persons responsible for assisting same in the fulfilling legal obligations with regard to environmental regulations;
- compliance with regulations in terms of Safety, Health and Environment (HSE);
- compliance with guidance from the Integrated Environmental Authorities;
- prevention of pollution and reduced consumption of natural resources to a minimum (energy and materials);
- maintenance and improvement of the structural and organizational conditions allowing for the granting of the integrated environmental and safety certification UNI EN ISO 14001 and BS OHSAS 18001 with the aim of allowing for their renewal;
- adoption of an organizational system allowing for the ongoing verification of the validity of the authorizations granted to third party companies whose possession is required for compliance with legal obligations;
- prior environmental risk assessment and risk assessment for staff in view of preventing any negative impact due to the introduction of new processes, modifications, developments or cessation of activities;
- provision of safety and environmental protection procedures and operational instructions designed to ensure both the proper functioning of equipment and the avoidance of emergencies and faults;
- provision of the aforementioned procedures and operational instructions designed to ensure compliance with environmental regulations;
- ongoing compliance checks on working practices and the content of Company procedures adopted by carrying out audits on an internal basis run by the HSE Compliance Function;
- system implementation based on audit findings;
- environmental monitoring to ensure compliance with regard to emissions and waste in terms of guidance from the Integrated Environmental Authorities;
- appropriate waste classification and CER Code attribution;
- management of temporary waste deposits in line with IEA guidance and legal provisions;
- appropriate management of Waste Identification Forms and Annual Environmental Declaration;
- provision of effective information and training for all Staff with regard to safety, health and environmental protection issues;
- involvement of all workers (including via their representatives) in terms of safety, health and environment management;
- product planning designed to minimize impact throughout their life-cycle, specifically through the development of environmentally compatible packaging;
- appropriate communication of results of initiatives undertaken;
- promotion of cooperation and communication with public authorities and local communities;
- training of suppliers/contractors to pay the same attention as that paid by the Company in safety, health and the environment;
- ongoing checks on scientific and technological advances in view of applying the best protective techniques and technologies available in terms of safety, health and the environment;
- organization of a record-keeping system ensuring the availability of legally required documentation and authorizations, as well as the appropriate management of functional documents for the purpose of managing the environmental system;

- insurance of devices, human resources, specialist and technological competencies as well as financial resources essential to implement and monitor the Environmental Management System.

II.19 Relations with associations, trustee organizations and political parties

LUSOCHIMICA will not finance political parties, movements, committees or political or trustee organizations, or their representatives or candidates.

It will not finance or sponsor organizations or congresses designed to create political propaganda.

II.20 Relations with international operators

LUSOCHIMICA undertakes to ensure all of its relations, including commercial relationships, maintained with international operators are fully compliant with applicable laws and regulations.

The Company undertakes to adopt all necessary measures to ensure the trustworthiness of such operators as well as the legitimate source of their capital and means in terms of their relations with the Company.

II.21 Protection of individual character

LUSOCHIMICA recognizes the need to protect individual freedom in all of its forms and condemns all manifestations of violence, especially if designed to limit the freedom of its Staff. The Company undertakes to promote the sharing of these principles in the context of its business activities and amongst its employees, partners, suppliers, consultants and partners.

II.22 Protection of company capital and creditors

One of the central defining aspects of LUSOCHIMICA's ethical conduct is its respect of behavioral principles designed to ensure the integrity of its company capital and to protect its creditors and third parties entering into relations with the Company and promoting transparency and the upstanding moral values more generally in terms of financial and economic aspects.

LUSOCHIMICA thus provides for the communication and observance of behavioral rules designed to protect the aforementioned values, also in view of preventing those offences detailed in Italian Legislative Decree 231/01.

With specific reference to account-keeping, LUSOCHIMICA considers the veracity, correctness and transparency of its accounts, balance sheets, relationships and other company communication required by law and directed towards its Partners or the public to be an essential principle informing its way of doing business and ensuring fair competition. This requires in-depth validity, accurateness and completeness of all basic information recording by accounting.

II.23 Accounting checks and transparency

All management activities at LUSOCHIMICA must be accurately and truthfully represented in its accounts.

All operations are to respect the following principles:

- upstanding moral values in terms of management
- complete and transparent information;
- legitimate form and content;
- clear and truthful accounting records in line with applicable regulations and internal procedures.

Accounting documentation must comply with the above-mentioned principles and must be easily traceable and logically ordered.

The Company will ensure full payment of services according to contractual modalities. Payments will not be made to individuals not appearing in the contract.

The use of Company funds for illegal or improper purposes is absolutely prohibited. Payments not based on authorized Company transactions are not to be made to any individual for any reason and illegal forms of payment are not to be used.

The Company requires that all transactions such as credits, outstanding balances, shares, debits are to feature on the balance sheet without exception, fully respecting all applicable regulations in terms of balance sheet formation and evaluation. The Company thus prevents the creation of false, incomplete or misleading entries and ensures that no secret or unregistered funds are created and that no deposits are made in personal account and that no non-existent operations are invoiced.

The documents demonstrating the veracity of account-keeping must allow for a clear reconstruction of accounting operations as well as identification of any errors.

Internal Company procedures regulate all economic operations and transactions including employee and/or partner expenses of all kinds and those of professional partners, the legitimacy, authorization, coherence, congruity and appropriate record-keeping and verifiability of which must be possible with regard to those financial resources used or to be used.

The Company may grant contributions or sponsorship to not for profit public or private bodies, aimed at social or cultural objectives, in full respect of accounting and tax

regulations, in the form of fully transparent procedures, with specific reference to the criteria used and the appropriateness of the relevant activities.

II.24 Transparency of commercial transactions

LUSOCHIMICA and all of its employees must not be involved in operations with the potential to involve money laundering for the Company's benefit.

The Company's management is based on absolute transparency of commercial transactions and provides the most appropriate tools to fight against money laundering.

Full respect of the principles of upstanding moral values, transparency and good faith in terms of relations with all contractual partners must be maintained.

II.25 Repudiation of Criminal Organizations

LUSOCHIMICA recognizes the primary value of the principles of democratic order and free political determination that inform the State. It repudiates every form of criminal organization (in particular, criminal associations and mafia-type organizations) at the national and transnational level.

Therefore, any behavior that may constitute or be linked to terrorist activity or subversion of the State's democratic order, or that may constitute or be linked to crimes, even of a transnational nature, pertinent to criminal or mafia-type associations, money laundering, the use of money, goods, or services of illicit origin, inducements not to make statements or to make false statements to judicial authorities, personal favoritism, as well as those pertinent to criminal associations aiming to engage in illegal trafficking of drugs, or even those pertinent to possible violations of legal provisions against clandestine immigration, is forbidden and completely foreign to the Company.

LUSOCHIMICA adopts suitable measures to prevent the risk of its own involvement or the involvement of its employees in relationships and activities undertaken under any name and in any form, even in the form of mere assistance and help, with such organizations.

For this purpose, LUSOCHIMICA does not institute any working relationship, cooperation, or trade with entities, whether natural persons or legal entities, directly or indirectly involved with criminal organizations or in any case connected through family relationships or by marriage with leaders of known criminal organization, just as it does not finance or facilitate in any way any activity that may be connected to such organizations.

II.26 Protection of Industrial and Intellectual Property Rights

LUSOCHIMICA respects regulations concerning protection for brands, patents, and other distinctive indications and concerning authors' rights.

It does not allow the use, under any name and for any purpose, of products with counterfeit brands or indications, nor the manufacture or sale of, or, in any way, any activity involving products already patented by third parties and to which it does not possess any rights.

Nor does it allow the use of creative work not bearing the validation of the Italian Society of Authors and Editors or bearing an altered or falsified validation; it also forbids the reproduction of data processing programs and the content of databases, as well as the misuse and dissemination, in any form, of protected creative work, even by revealing the respective content before it is made public.

II.27 Cooperation with the Authorities in Case of Investigations

The company recognizes the value of judicial and administrative authorities and pursues its goals with maximum integrity and proper relationships with the competent authorities.

To this end, it forbids any behavior aiming to or capable of interfering with investigations or inquiries undertaken by the competent authorities, and in particular, any behavior intending to hinder the search for the truth, even by inducing people contacted by the judicial authorities not to make statements or to make false statements.

The company makes a commitment to adopt all necessary measures in order to provide the cooperation requested by the authorities, within the limits of respect for the currently valid regulations.

II.28 Proper Use of Information Systems

The company pursues the goal of proper use of information or telecommunications systems in order to guarantee the complete and genuine nature of the data handled, taking care of the interests of the company and third parties, with particular reference to public authorities and institutions.

The information technology equipment of LUSOCHIMICA must be used with full respect for the currently valid law and specific internal procedures.

Therefore, the improper use of information technology equipment that could lead to behavior including illicit access to third-party information or telecommunications systems, wiretapping, hindrance to or illicit interruption of communication through information technology or telecommunications, the damaging of private information, data, or programs, or of those used by the State or any other public sector entity or those useful to the public, and the damaging of information or telecommunication systems, whether used by private parties or the public, is forbidden and completely foreign to the company.

To this end, LUSOCHIMICA adopts suitable measures in order to ensure that access to telecommunications and information technology data takes place with full respect for the

currently valid regulations and the privacy of any parties involved, and in order to guarantee the confidentiality of information and make sure that their handling is carried out by parties expressly authorized for this purpose, hindering any undue intervention.

Specifically, the Company forbids the following:

- malicious access to information or telecommunications systems protected by security measures;
- the destruction, deterioration, deletion, or altering of information, data, or computer programs belonging to others, to the State, or to any other public sector entity;
- the production of false computer documents, whether private or public, that may be used as evidence;
- the installation of equipment capable of intercepting, hindering, or interrupting communication taking place through an information or telecommunications system or interfacing between multiple systems;
- the theft, reproduction, dissemination, or malicious delivery of codes, passwords, or other means of access to an information or telecommunications system protected by security measures.

II.29 Internal Control

It is part of the Company's policy not only to disseminate a culture characterized by the existence and importance of control measures at all levels, but also to inculcate a mentality focusing on their exercise.

With its own internal control system, LUSOCHIMICA intends to pursue the general goals of the effectiveness and efficiency of its own operations, the safeguarding of company goods and resources, the observance of the law, applicable regulations, and internal procedures, as well as the reliability of accounting and financial data.

Every level of the organization and every part of the company, therefore, is specifically responsible for implementing, maintaining, and monitoring the proper functioning and effectiveness of the internal control system. In the implementation of its internal environmental and security audits, LUSOCHIMICA makes use of the HSE Compliance Function or of external consultants.

III. Standards of Behavior

III.1 Standards of Behavior for Members of Company Bodies

The company bodies of LUSOCHIMICA, being aware of their own responsibility, as well as with respect for the law, currently valid regulations, and the company Charter, are required to observe the provisions of the present Code of Ethics, which should inform their activity in the pursuit of profit and the growth of the company with the values of honesty, integrity, loyalty, proper behavior, respect for people and rules, and cooperation with other members

of the organization.

The entire Board of Directors has the duty of managing the company responsibly in the pursuit of the goal of standards of excellence in the quality of services provided and the management of its premises, in relation to which the pursuit of corporate profits is a subordinate goal.

The following are required for the members of company bodies:

- to behave in a spirit of autonomy, independence, and propriety with public institutions at all times and in particular when applying for or renewing the necessary authorizations for the company to engage in its activities;
- to behave in a spirit of autonomy, independence, and propriety with private entities, economic associations, political bodies, as well as any other domestic and international actor;
- to behave with integrity, loyalty, and a sense of responsibility in regard to the Company;
- to guarantee assiduous and well-informed participation in the meetings and activities of the company's bodies;
- to ensure the sharing of the company's vision and the exercise of critical thinking in order to guarantee significant personal contributions with the awareness of the roles undertaken;
- to evaluate situations of conflicts of interest or incompatible responsibilities, duties, or positions inside and outside the Company, while refraining from acting under conditions of conflict of interest in regard to their own activity;
- to engage in discreet use of any information of which they gain knowledge in the course of their duties, while avoiding making use of their position in order to obtain personal advantages, whether direct or indirect. Any outward communication must respect the laws and the practices of good behavior and must be appropriate to safeguard sensitive information and industrial secrets;
- to respect, within the limits of their own competence and responsibilities, the standards of behavior ordered for LUSOCHIMICA staff in accordance with the next paragraph.

It is the specific duty of the company's bodies to promote the image and prestige of LUSOCHIMICA. This duty must be implemented by taking as the main point of reference the respect for and safeguarding of the requirements of clients, the provision of highly specialized services, the management of production sites, the use of the best technology available, care for the environment, care for the health and safety of the workers deployed, with the assistance of technically prepared staff, and must constantly focus on respect for moral values, as enshrined in the present Code.

III.2 Standards of Behavior for Staff

Staff must adapt their own conduct, in both internal and external relations, to the currently valid regulations, as well as to the principles expressed in the present Code of Ethics, as well as the standards of behavior listed below, with respect for the Model and currently valid company procedures.

Specifically, the following are required for the management of the company:

- behavior with a spirit of integrity, loyalty, and a sense of responsibility towards the Company;
- not to engage in behavior that infringes the inherent obligations of their position or the duty of loyalty that these entail;
- to refrain from acting in situations of conflict of interest involving them or their relatives and spouses, while always informing the Board of Directors of such situations in advance;
- to represent an example for their subordinates through their own behavior;
- respect for the laws concerning protection of the environment and care for workers' health and safety;
- respect for laws concerning proper and transparent corporate management;
- to direct subordinates to observe the Code of Ethics;
- to act so that subordinates will always keep in mind the principles of the Code of Ethics and the fact that observing it constitutes an integral part of their work.

It is legitimate for the management to state positions that diverge from those of the company bodies as long as this is only a functional issue in view of the requirement of improving the quality of services provided. Information received in the course of work is considered confidential and any use thereof that does not derive from the performance of institutional duties is forbidden.

Specifically in reference to respect for and effective implementation of the Model, the Staff, considered as a whole, must do the following:

- refrain from engaging in behavior contrary to the standards ordered by the Code of Ethics;
- avoid engaging in, initiating, or joining in behavior capable of constituting the types of crimes mentioned in the Decree;
- cooperate with the Supervisory Board in the course of verification and oversight activity carried out by the latter, providing the information, data, and news requested by it;
- carry out the communication with the Supervisory Board foreseen by the present Code;
- notify the Supervisory Board of any problems with or infringement of the Model and/or the Code of Ethics, with respect for the terms of the present Code and the Model.

In any case, it is reiterated that:

- all actions and operations, and the behavior in general in which the employees of the Company engage while carrying out their work must be in a spirit of maximum transparency, correctness, and legitimacy;
- all activity within the company must be carried out with professional commitment and rigor;
- every employee must provide a professional contribution suitable to the duties assigned and must act in a way that safeguards the prestige and reputation of the Company;
- relations among employees at all levels must be based on criteria and behavior involving propriety, cooperation, loyalty, and mutual respect.

Every employee of the Company, in any case, is responsible for obtaining knowledge of the laws and regulations that concern his or her duties in order to recognize potential risks, and in such a case, request support from the Supervisory Board.

At any moment, Staff may request clarifications from the Supervisory Board, both orally and in writing, in regard to the correct interpretation of the Code of Ethics or of the Protocols connected with the Model, the legitimacy of specific behavior, and in general, regarding the compliance of specific behavior with the Model or the Code of Ethics.

Staff are in any case required to respect the principles and standards of behavior outlined below.

III.2.a) Conflicts of Interest

Staff must avoid creating or facilitating conditions of conflict of interest, even only on a potential basis, involving themselves, their relatives or spouses, and the Company, as well as any activity that may interfere with their ability to undertake impartial decisions in the interest of the Company and with respect for the standards of the present Code.

Members of the Administration are required to inform the Board of Directors of any interest of their own, their relatives, their spouses, or third parties with which they may be engaged in transactions, in which they are involved.

Employees are required to inform their own direct supervisor of any interest of their own, their relatives, their spouses, or third parties with whom they may be engaged in transactions, in which they are involved.

Said notifications must be precise and must specify the form, conditions, and origin of the interest. While awaiting company decisions on this point, the interested parties will refrain from engaging in any transactions.

III.2.b) Relations with Public Authorities

All relations with entities that can be considered state officials, politically involved persons, their relatives, and in any case, persons closely and notably linked to them, or parties entrusted with public services, must be maintained with full respect for the laws and the standards currently in force, as well as the Model and the present Code of Ethics, in order to ensure the complete legitimacy of the Company's operations.

Relations with state institutions are reserved exclusively to the positions or parties entrusted with these duties, in virtue of specific authorizations or powers of attorney.

LUSOCHIMICA forbids its Staff from accepting, offering, or promising, even indirectly, money, gifts, goods, services, benefits, or favors (even in terms of employment opportunities) in regard to relations maintained with state officials, parties entrusted with public services, "politically involved persons", their relatives, and in any case with persons closely and notably linked with them, that aim to affect their decisions, in view of more favorable treatment or undue favors or for any other purpose.

Any behavior that aims in any way to promise or provide the state official or the party entrusted with public services, politically involved persons, their relatives, and in any case persons closely and notably linked with them, money or other benefits in order to induce him or her, to engage in an act under his or her competence in order to obtain a benefit for oneself of the Company is forbidden.

Any requests for, or offers of, money, goods (except those of a limited value, meaning as such utilitarian items, as may be interpreted by an impartial observer), favors of any type, forwarded or received by Staff must be brought to the knowledge of their immediate superior and the Supervisory Body on a timely basis.

Gifts and courtesies towards state officials or state employees are allowed only when, being of a limited value, they do not compromise the integrity and independence of the parties involved in any way and cannot be interpreted as a means to obtain benefits improperly.

In the course of relations with the state administration, the employee or officer who, in virtue of the duties undertaken by him or her or powers entrusted to him or her, engages in requests for, handling, and/or management of taxes, subsidies, financing, or reimbursements originating from the state or any other public entity, is required to perform his or her duties exclusively for the purposes for which they were entrusted, to make use of the other positions foreseen by company procedures, and to maintain accurate documentation of every transaction, which ensures maximum transparency and clarity of agreements and of the relevant flows of money.

In any case, in the course of negotiations or any other relationship with the state administration, Staff must refrain from engaging directly or indirectly in actions with the following aims:

- proposing employment and/or trade opportunities from which they may derive benefits for themselves or others, to state administration employees or their relatives or relatives by marriage;
- requesting or obtaining confidential information that may compromise the integrity or reputation of both parties.

In the case of investigations, inspections, or requests by the state authority, Staff are required to ensure due cooperation.

III.2.c) Relations with Clients

Staff must base their relations with clients on maximum propriety and transparency, with respect for the laws and the standards in force, in addition to the Model and the present Code of Ethics, as well as internal procedures, with particular reference to those regarding relations with clients.

In particular, employees have the following obligations:

- to provide accurate and comprehensive information about products and services;

- to guarantee the standard of excellent quality in production, adopting the absolute quality of the active ingredients produced as a preeminent goal, as well as safeguarding the environment and caring for health and safety in the workplace.

III.2.d) Relations with Suppliers

Staff must base their relations with suppliers on maximum propriety and transparency, with respect for the laws and the standards in force, in addition to the Model and the present Code of Ethics, as well as internal procedures, with particular reference to those regarding purchases and the selection of suppliers.

In particular, in regard to relations of procurement, supply, and provision in general of goods or services, employees have the following obligations:

- to observe the procedures for the selection of and management of relations with suppliers;
- not to exclude any supplier company in possession of the required prerequisites from the possibility of competing in order to be assigned the status of supplier to the Company by adopting objective evaluation criteria for selection in accordance with stated and transparent procedures;
- to obtain suppliers' cooperation in constantly ensuring compliance with the Company's requirements in terms of the quality of services provided;
- to observe and require observance of contractual terms;
- to maintain a frank relationship with suppliers;
- to inform their direct supervisors of any problems with suppliers that arise.

III.2.e) Obligation to Remain Up to Date

In the performance of their activity on behalf of LUSOCHIMICA, all employees are required to maintain a high level of professionalism at all times.

In addition, all employees are required to remain constantly up to date in regard to the area of their specific competence.

III.2.f) Confidentiality

Staff must treat data, news, and information that enter into their possession with strict confidentiality, even after their working relationship has ended. In particular, it must avoid the dissemination of such news or their use for speculative purposes by themselves or third parties.

Staff must also treat information and data concerning strategic roles, positions, and sensitive procedures as fully confidential, especially when these are positions and procedures exposed to any form of external intervention.

Staff must treat information concerning procedures of purchasing of goods and services, as well as production processes, as fully confidential.

All information, data, or documents of which employees gain knowledge during the performance of their work belongs exclusively to LUSOCHIMICA, just as, on an indicative and not exhaustive basis, every idea, formula, technique, business plan, marketing plan, and similar information constitute confidential information that is exclusive property of the Company. Therefore, it is forbidden to reveal similar information to outsiders without express authorization and to use them for any personal benefit. Without prejudice to the prohibition of the dissemination of news concerning the organization of the company and its production methods, or of making use of them in a way that may cause prejudice to it, every employee must specifically:

- obtain and handle only the necessary and suitable data for purposes directly relevant to the duties performed;
- obtain and handle said data only within the framework of specific procedures;
- maintain said data in a way that will hinder other unauthorized parties from gaining knowledge of them;
- communicate said data in the framework of predetermined procedures and / or with the explicit authorization of superiors;
- ensure that there are no absolute or relative limits to the possible dissemination of information concerning third parties linked to the company by any type of relationship, and if there are, obtain their consent;

Information of a confidential nature may only be made known to the Supervisory Body or to the judicial authorities.

III.2.g) Due Diligence in the Use of the Company's Goods

Staff must protect and safeguard the values and goods of the Company entrusted to them and contribute to taking care of the Company's assets in general, avoiding situations that may have a negative effect on the completeness and security of said assets.

In any case, staff must avoid the use of the Company's resources, goods, or materials for personal benefits or for any type of improper purposes.

III.2.h) Respect for Regulations on Illegal Immigration

Staff must follow the following principles:

- always consider the interest of workers as prevalent with respect to any economic consideration;
- at the moment of hiring and during the evolution of the entire working relationship, verify that workers coming from third countries are in compliance in terms of their residence permit and in case of its expiry, have taken care to renew it;
- in case use is made of temporary workers through appropriate agencies, ensure that said entities also make use of workers who are in compliance with regulations concerning residence permits and expressly request a commitment to respect the Model;
- ensure that any third parties with whom the Company cooperates (suppliers, consultants, sub-contracting companies, etc.) make use of workers in compliance with the regulations concerning residence permits and expressly request a

commitment to respect the Model.

III.2.i) Care for Health and Safety at the Workplace

LUSOCHIMICA faces the future by adopting policies for workers' safety and care for the environment as values.

The long-term objective is to reduce operating accidents, injuries at work, and the environmental impact to zero.

The Company has obtained voluntary certification such as the UNI EN ISO 14001 and BS OHSAS 18001 combined environmental and safety certification.

The Company, in line with its own development and technological progress, adopts the most suitable measures to eliminate the risks connected with the exercise of its business activity, guaranteeing healthy facilities and choosing machinery, procedures, and materials aiming to attenuate any risks that these may entail for the health and safety of workers. In any case, the Company makes a commitment to evaluate potential residual risks carefully in order to mitigate their possible consequences as much as possible.

The Employer, on an autonomous basis, in compliance with the legislative provisions, or if alerted by any other party, adopts all necessary measures in order to safeguard and improve conditions in the working environment and in particular in regard to hygiene and safety, as well as the procedures which aim to improve the business climate constantly.

In order to respect the prescriptions of Legislative Decree 81/08 and its subsequent amendments and additions, the Employer guarantees the following:

- respect for the legal technical and structural standards for devices, equipment, and worksites;
- the performance of constant monitoring and periodic maintenance of its own installations and devices, wherever they are located and operating in order to guarantee maximum safety and the quality of its own services;
- constant provision of information and training concerning the proper use of devices, equipment, and machinery;
- the activity of risk assessment and preparation of the consequent preventive and protective measures;
- the constant monitoring and adoption of suitable measures in order to take care of the risks originating from chemical agents, explosive atmospheres, and the handling of flammable substances (this list is to be considered an example);
- the organization of activities such as emergency action, first aid, management of competitions, periodic safety meetings, and consultations with workers' representatives on safety matters;
- health oversight activities;
- the activity of providing information and training to workers;
- supervision activity in regard to respect for procedures and operational instructions;
- periodic inspections and audits of the application and effectiveness of the procedures adopted;
- obtaining the documentation and certification required by law;
- constant improvement of the requirements that led to obtaining the voluntary combined health and environmental certification.

The Head of the Risk Prevention and Protection Service (hereafter also referred to as the "HRPPS") is nominated, and all parties operating within the company must follow his or her indications.

In the performance of his or her own duties and in the framework of relations maintained with the workers' representative in charge of safety issues, the HRPPS must be considered a qualified consultant of the Employer.

The competent physician must do the following:

- cooperate with the Employer and the HRPPS in order to assess the risks in order to plan health supervision activities;
- plan and implement the health supervision that the workers must undergo;
- create, update, and keep a health and risk card for each worker;
- visit the worksites on a periodic basis.

The workers, in turn, must guarantee respect for the following rules:

- adopt safe behavior during work, that is, to act with respect for company regulations, procedures, operational instructions, prevention standards in general, and the present Code of Ethics;
- avoid behavior that is dangerous for them or others;
- respect orders given by their immediate supervisors or the Employer;
- respect their duties and operational assignments;
- take care of their own health and safety and that of other persons present at the worksite, who may be affected by their actions or omissions, in accordance with their training, instructions, and the means provided by the Employer;
- contribute, together with the Employer, the Management, and their Supervisors, to the fulfilment of the requirements foreseen in support of health and safety in the workplace;
- observe the orders and instructions given by the Employer, the Management, and Supervisors for the purpose of overall and individual protection;
- make proper use of working equipment, substances, and dangerous preparations, means of transport, and safety devices;
- immediate notification of the Employer, Management, or Supervisor of any defects of the tools and devices, as well as any dangerous condition of which they become aware, and in case of an urgent situation, taking direct action within the framework of their own competence and the possibility of eliminating or reducing situations of serious and imminent danger;
- do not remove or modify safety, signal, and control devices without authorization;
- make appropriate use of the means of protection made available to them;
- take care of the personal protection items made available to them, without modifying them in any way on their own initiative, and notifying the Employer, the Management, or the Supervisor of any defects or problems with them;
- do not undertake any operations or maneuvers on their own initiative that do not belong to their area of competence, that is, which may compromise their safety or that of other workers;
- participate in the training programs organized by the Employer;
- undergo the health inspections established by the current regulations or in any case ordered by the competent physician;
- cooperate as much as possible with the activities or indications of the Prevention

- and Protection Service;
- cooperate with responsible behavior and respect for company rules in the case of an alarm due to an emergency situation;
- full awareness of the implementation of the organizational and management model adopted, while cooperating with the persons in charge of attaining goals in terms of prevention.

Subcontractors and service providers, suppliers, associates, etc., must also guarantee respect for the following rules:

- adopt safe behavior in their activity; that is, act with respect for company procedures, instructions received, prevention standards in general, and the present Code of Ethics;
- respect for signs posted by the company;
- respect for the contractual terms that regulate relations between the parties;
- in the case of assigned contracts, whether for work or for supplies, respecting the preventive indications deriving from the cooperation and coordination activity carried out between the parties and the company procedures intended to regulate their execution.

III.2.j) Care for the Environment

In regard to the environment, the company is strongly committed to dealing and managing environmental issues and concerns in a structured way, with medium-term policies and formal programs. The objectives in this field are on the one hand, the constant perfection of the company's behavior and assets in view of constantly increasing compliance with currently valid legislation, and on the other, the building of a coordinated environmental management system that will highlight the progress achieved over time.

Specifically in order to guarantee the pursuit of such goals, the Company has equipped itself with voluntary certification, such as the UNI EN ISO 14001 and BS OHSAS 18001 combined environmental and safety certification.

All the Company's staff, in the performance of their own duties within the company, must always view the need to care for the environment as a consideration prevailing over any economic considerations.

Staff must do the following:

- contribute, as far as is within their own competence, to compliance with the obligations foreseen in terms of care for the environment;
- contribute, as far as is within their own competence, to respect for the prescriptions foreseen by the Combined Environmental Authorizations;
- constantly evaluate the effects of their own behavior in relation to the risk of damage to the environment;
- in accordance with their own training and experience, as well as the instructions and means provided or prepared by the Employer, avoid imprudent behavior that might cause damage to the environment;
- refrain from carrying out any operations or maneuvers on their own initiative that do not fall within their own jobs or in any case might potentially cause damage to the

- environment;
- observe the prescriptions contained in the procedures that concern the differentiation of waste and the respective forms of disposal;
 - observe the prescriptions contained in the procedures that concern the proper operation of waste treatment plants;
 - ensure care for the soil and the subsoil, conservation of land, as well as care for ground water, seawater, and underground water;
 - adopt all necessary prescribed precautions in order to limit air and water pollution to a minimum and in any case keep emissions or discharges below the limits set by the Combined Environmental Authorizations and the law;
 - respect procedures intended to prevent environmental emergencies.

III.2.k) Care for the Company's Capital and Creditors

Staff must do the following:

- engage in proper, transparent, and cooperative behavior, with respect for the standards of the law and the company's internal procedures, in all activities with the objective of drafting the balance sheet and other company statements foreseen by the law and directed to shareholders or the public, in order to provide true and correct information on the assets and the economic and financial situation of the Company;
- strictly observe the standards set by the law to protect the completeness and validity of the company's capital (for example: mergers, separations, acquisitions of companies, distributions of assets and reserves, etc.) and always act with respect for the company's internal procedures, which are founded on such standards, in order not to infringe the guarantees for creditors and third parties in general;
- handle any liquidation operations for the Company with consideration for the preeminent interest of the company's creditors; therefore, the removal of company assets from being destined for creditors by distributing them among the shareholders before the payment of entitled creditors, or the setting aside of the sums necessary in order to satisfy them, is forbidden.

No hiding of information or any partial or divergent presentation of economic, asset-related, and financial data by the management and the parties subject to their direction and control is allowed.

All internal and external associates involved in the production, handling, and definition in accounting terms of such information are responsible for the transparency of the Company's accounts and balance sheets. Every transaction with economic or financial relevance or relevance to assets must be adequately recorded, and for every entry there must be adequate supporting documents, in order to be able to proceed at all times to the performance of audits that certify the features and the motivation of the transaction and allow identification of who authorized, carried out, recorded, and validated the transaction itself.

For every transaction, in any case adequate supporting documentation of the activity

carried out is retained, in order to allow the following:

- easy recording in the accounts;
- identification of the various levels of responsibility;
- accurate reconstruction of the transaction, also in order to reduce the probability of misinterpretation.

The Company requires extensive dedication from its Staff in order for the acts of management and the transactions implemented during its activity to be represented correctly and on a timely basis in the accounts.

Every entry must reflect exactly what arises from the supporting documents.

Every oversight, omission, or falsification of which employees may gain knowledge must be referred immediately to the Supervisory Body.

III.2.l) Measures Against Money Laundering

Staff are to adopt all suitable tools and precautions in order to guarantee the transparent and correct nature of commercial transactions.

In particular, the following are required:

- assignments entrusted to any service providing companies must be drafted in writing, with a reference to their content and the agreed financial terms;
- the competent departments must ensure that the regular making of payments to all contracting parties is inspected, even by verifying the congruence between the party to whom payment orders are issued and the party collecting the respective sums;
- the inspection of financial flows related to relations (intra-group payments or transactions) with companies in the Group must be carried out;
- the minimum requirements set and required for the purpose of selection of parties offering the goods or services that the Company intends to purchase must be respected;
- criteria for evaluating bids must be determined;
- in regard to the commercial or professional reliability of suppliers and partners, all necessary information must be requested and obtained;
- in case of the conclusion of joint venture agreements for the purpose of carrying out investments, maximum transparency must be guaranteed.

III.2.m) Protection of Industrial and Intellectual Property Rights

Staff must respect the legitimate industrial and intellectual property rights of third parties and refrain from unauthorized use of such rights, with awareness that the violation of said rights may have negative consequences for the Company.

In particular, employees and associates, in carrying out their activities, must refrain from any behavior that may constitute misappropriation of industrial property rights, alteration or counterfeiting of distinctive markings of industrial products, or of patents, designs, or industrial models, whether domestic or international, as well as refraining from importing,

selling, or using or otherwise placing on the market any industrial products with counterfeit or altered distinctive markings or those made through misappropriation of industrial property rights.

All Staff must refrain from illicit and / or improper use, in their own interest, that of the company, or that of third parties, of creative work (or parts thereof) protected in accordance with regulations concerning the infringement of authors' rights.

III.2.n) Use of Information Systems

In carrying out its professional activity, Staff must use information technology or telecommunication tools and services with full respect for the currently valid respective regulations (and in particular those concerning cybercrime, information security, privacy, and authors' rights) and internal procedures.

Specifically, the following are forbidden for Staff:

- malicious access to an information or telecommunications system;
- unauthorized possession and malicious dissemination of access codes to information or telecommunications systems;
- dissemination of equipment, devices, or computer programs intended to damage or disrupt an information or telecommunications system;
- intercepting, hindering, or illicitly disrupting communication by computer or telecommunications;
- damaging computer information, data, and programs and information or telecommunications systems.

Staff may not load borrowed or unauthorized software onto company systems, just as it is forbidden to make unauthorized copies of programs subject to licenses for personal, business, or third-party use.

Staff must use the computers and information system tools made available by the Company exclusively for the company's purposes; as a consequence, the Company reserves the right to verify the content of computers, as well as the proper use of information system tools with respect for company procedures.

Staff are required not to send threatening or abusive e-mail messages, not to use language and expressions that are unsuitable for the Company's style, or to use inappropriate language in any case.

III.2.o) Protection of Personal Data and Relations with the Italian Data Protection Authority

Every employee must do the following:

- obtain and handle only the necessary data that is directly connected with his or her duties;
- retain said data in such a way as to hinder external third parties from gaining

- knowledge of them;
- communicate and disclose data in the framework of predetermined procedures, that is, following authorization by the person entrusted with this;
- ensure that there are no binding confidentiality issues in virtue of relations of any type with third parties;
- guarantee compliance with any prescriptions issued by the Italian Data Protection Authority or any prohibitions or injunctions adopted by the latter.

III.3 Standards of Behavior for Third-party Recipients

The present Code of Ethics is also applicable, in addition to Company Bodies and Staff, to Third-party Recipients. These mean parties outside the Company who are acting directly or indirectly on the company's behalf (purely as examples, companies belonging to the Group to whom specific activities are outsourced, any type of associates, consultants, suppliers, trading partners, sub-contracting companies, and the Competent Physician).

Third-party Recipients, on an equal basis as other parties, are required to respect the provisions of the Model and the Code of Ethics, and specifically, to follow the relevant ethical principles and the standards of behavior set for staff.

An express commitment to respect the standards of the present Code of Ethics is an indispensable condition for the conclusion and / or continuation of contractual relationships with Third-party Recipients. For this purpose, the insertion of relevant clauses (i.e., a clause binding on third parties) in letters of assignment and / or negotiated agreements is envisioned with the intention of confirming the Third-party Recipient's obligation to comply fully with the present Code, as well as establishing, in case of infringement, a warning to comply with the Model and / or the Code of Ethics on a timely basis, or the application of penalties, or, in the most serious cases, dissolution of the contractual relationship.

For contractual relationships already existing at the time when the present Code of Ethics comes into force, LUSOCHIMICA takes care to make the Third-party Recipient sign an additional agreement with the content mentioned above.

III.4 Obligation to Inform the Supervisory Board

Members of the Company Bodies, Staff, and Third-party Recipients are required to inform the Supervisory Board on a timely basis of violations, even potential ones, of legal standards or regulations, the Model, the present Code of Ethics, the Protocols, and the internal procedures of which they may gain knowledge during the performance of their duties and work.

In any case, the following information must be forwarded to the Supervisory Board:

1. Any information that may relate to violations, even potential ones, of the Model, including (purely on an indicative basis) the following:
 - any orders received from a superior and considered contrary to the law, internal

standards, or the Model;

- any requests for, or offers of, gifts (of more than a limited value) or of other benefits coming from public officials or parties entrusted with public services;
 - any significant divergences from the budget or anomalous expenditure;
 - any omissions, negligence, or falsification in the keeping of accounting records or the keeping of the documentation on which accounting entries are based;
 - measures and / or news coming from members of the judicial police or any other authorities from which one may infer that investigations are in process that may concern the Company, its employees, or members of the company bodies, even indirectly;
 - requests for legal assistance forwarded to the company by employees in accordance with the National Collective Bargaining Contract in the case that a criminal procedure is initiated against them;
 - news regarding disciplinary proceedings under way and the penalties that may be ordered, or the reason for their dismissal;
 - any notifications concerning shortages or shortcomings of workplaces, work equipment, or protective equipment, and in any case, any other hazardous situation related to safety and health at work;
 - any violation, even a potential one, of environmental standards or of the specific procedures issued on this subject by the Company, which are an integral part of the HSE Management System;
 - information concerning the existence of an actual or potential conflict of interest with the Company;
2. those concerning the company's activity, which may become relevant in regard to the performance of the Supervisory Board of the duties assigned to it, including (exclusively on an indicative basis) the following:
- the flows of information prepared by the Key Officers foreseen in the Special Part of the Model;
 - news related to organizational changes (including those that concern the HRPPS or the Competent Physician);
 - updates to the system of powers of attorney and authorizations;
 - decisions concerning requests for, the provision of, and the use of public financing;
 - the annual balance sheet, accompanied by the notes to the accounts;
 - communication by the board of auditors regarding every critical situation that has arisen, even if it has been resolved;
 - periodic reporting on occupational safety and health matters, and especially the report of the periodic meetings in accordance with Article 35 of Legislative Decree no. 81/2008;
 - data concerning accidents and near-accidents at work that have taken place on the Company's premises;
 - information regarding the annual expenditure and investment budget drafted in order to carry out necessary and / or expedient improvements in terms of safety;
 - any updating of the Risk Assessment Document (RAD);
 - the indication by the Competent Physician of anomalous situations identified in the framework of periodic or scheduled visits;
 - information on expiring environmental authorizations and a copy of the renewed authorizations which concern areas of environmental risk;
 - any request received from the supervisory authorities on environmental or accident

prevention issues and the reports of their visits.

Communication sent to the Supervisory Board may be sent by e-mail to the address odvlusochimica@lusochimica.it or in writing to the attention of the Supervisory Board at LUSOCHIMICA S.p.a., Via Giotto 9, 23871 Lomagna (Province of Lecco), and / or Via Livornese 897, 56122 Pisa – La Vettola (Province of Pisa).

In any case, the Supervisory Board guarantees that the person engaging in communication, whenever identified or identifiable, will not be subject to reprisal, discrimination, or penalties in any form.

IV. Implementation and Inspection of Respect for the Code of Ethics

IV.1 Duties of the Supervisory Board

Inspection concerning the implementation of and respect for the Model and the Code of Ethics is assigned to the Supervisory Board, whose definition and nomination can be found in the Model.

Without prejudice to the content of the respective document named “Charter of the Supervisory Board” (which constitutes an integral part of the Model), with reference to the present Protocol, some examples of the Supervisory Board's duties are listed below.

This entity, among other things, must do the following:

- develop inspection and monitoring systems intended to allow for respect of the Model and the Code of Ethics, with the goal of reducing the risk of the crimes envisioned by the Decree being committed;
- state its own observations regarding both ethical concerns that may arise in the context of company decisions, as well as presumed violations of the Code of Ethics of which it may gain knowledge;
- make available every possible tool for learning and clarification regarding the correct interpretation and implementation of the provisions contained in the Model or the Code of Ethics;
- explain in depth and propose due updates of the Code of Ethics and internal procedures in order to allow their adjustment to changes in the company and areas of risk in view of the regulations in force on this subject;
- propose improvements and amendments of the Model adopted by the Company;
- promote and monitor the implementation by the Company of communication and training activity regarding the Model and the Code of Ethics;
- point out any violations of the Model or the Code of Ethics to the competent company bodies, suggesting the penalty that should be applied and verifying that any measures ordered are applied effectively.

IV.2 Violations of the Code of Ethics and Respective Penalties

Observance of the standards of the Code of Ethics must be considered an essential part of the duties incumbent on the company bodies, auditors, and the company's staff, as well as being an essential part of the contractual obligations assumed by the so-called Third-party Recipients.

Violations of the standards of the Code of Ethics will entail the application of the penalties foreseen in the Disciplinary System (to which the reader is referred) and as far as Third-party Recipients are concerned, those also repeated in the clauses of contracts.

Concerning Directors and Auditors, various types of penalties are foreseen, which range from a written notice to a warning to respect the Model and / or the Code of Ethics, to removal from duties.

Various types of penalties may be applied to Directors, which range, in order of increasing severity, from a written notice to a fine in an amount ranging from 8% to 15% of the net salary foreseen in the contract, to firing.

Various types of penalties may be applied to employees, which range, in order of increasing seriousness, from verbal criticism to a written admonishment, to a fine, to suspension from work or without pay for no more than three days, to firing.

Finally, regarding Third-party Recipients, who are required to respect the Code of Ethics in virtue of the respective clauses inserted in the relevant contracts, a lack of respect for the standards contained in the Code of Ethics may entail the ordering of penalties which consist of the following, in order of increasing seriousness: a warning, the application of a penalty of 50% of their agreed compensation, and the dissolution of the contract.

IV.3 Notification of Any Violation of the Code of Ethics

Whenever a party required to respect the Model and the present Code of Ethics gains knowledge of a fact or a circumstance that is capable of entailing the risk of their violation, he or she is required to notify the Supervisory Board to this effect on a timely basis.

The Company has instituted suitable dedicated communication channels in order to facilitate the process of notifying the Supervisory Board.

Specifically, an e-mail address, odvlusochimica@lusochimica.it, has been instituted, to which one may send any notifications concerning a lack of respect for the dictates of the present Code, which will also be used to receive notifications on an anonymous basis, namely those in which it is not possible to discern the identity of the sender.

In addition, notifications may be made in writing, by sending the respective notification, even anonymously, to the following address: Supervisory Board, LUSOCHIMICA, Via Giotto 9, 23871 Lomagna (Province of Lecco) and / or Via Livornese 897, 56122 Pisa – La Vettola (Province of Pisa).

In any case, the Supervisory Board takes measures in order for those who made the notifications not to be subject to reprisal, discrimination, or penalties in any form, ensuring suitable confidentiality for said parties.