



Marsina Engineering S.R.L.

CODE OF ETHICS

This Code of Ethics has been approved by the Management of Marsina Engineering S.R.L..

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1. INTRODUCTION

Marsina Engineering S.R.L. is an Italian company that has been designing, developing and supplying chemical plants for detergents since 1997, supported by a team of highly qualified engineers, designers and technicians. As a result of rigorous quality standards maintained during all production and installation phases, Marsina has supplied plants to many countries around the world-Africa, the Middle East, Europe and Central Asia.

1.1 *Vision&Mission of Marsina Engineering S.R.L.*

The mission of Marsina Engineering S.R.L. is to assure the utilization of modern and proven technologies and the selection of high quality materials, while being particularly attentive in complying with European Standards concerning environmental safeguards.

Apart from our standard plant equipment, we are structured to offer clients valid solutions to meet and satisfy their specific necessities: Marsina's expertise is an outstanding asset which we rely upon to cooperate with all companies, whether small- and medium- sized or multinationals.

We also keep improving our services in terms of efficiency, helping you to obtain the best system performance with a view to effectiveness and safety.

1.2 *Code of Ethics: Purpose, recipients and distribution*

This Code of Ethics describes the whole of the fundamental rights and duties that underlie the activity of Marsina Engineering S.R.L., as well as the lines of conduct adopted by the Company both within its business (in relations between employees) and externally (in relations with suppliers and clients).

The observance of these principles is essential to achieve the corporate mission of Marsina Engineering S.R.L: its recipients are required to strictly comply with the values and principles contained in the Code of Ethics. Particularly, through the Code of Ethics, the Company aims

to lead the recipients towards a decision to behave according to the ethical principles of fairness and equality, individual and environmental protection, diligence, transparency, honesty and confidentiality, leading them to the lines of conduct they should follow and those they should avoid.

This Code is compulsory for the Management and employees of Marsina Engineering S.R.L., as well as for all those who work and collaborate, permanently or under temporary contract, on behalf of the Company; however, it does not replace and does not override existing laws.

The Code will be widely distributed within the internal governance structure, and widely communicated to external stakeholders, including through its website.

The Code is made available to clients, suppliers and other external stakeholders who interact with the Company: Marsina Engineering S.R.L. is committed to facilitating and promoting the knowledge of the Code of Ethics by its recipients and to ensuring scrupulous vigilance in its observance, and The employees are obligated to quickly report to the Company's Management any news they may acquire regarding the violation of the rules of the Code of Ethics.

2. GENERAL PRINCIPLES OF BEHAVIOR

This chapter will describe all actions and behaviors to be maintained by each of the Recipients, according to current regulations and internal procedures.

2.1 Ethical principles

The principles listed below are considered fundamental, so the Company is committed to respecting them in relation to anyone, and requires that these principles be respected by the Recipients and all those who have any kind of relationship with Marsina, external and internal to the Company. The principles mentioned are: fairness, non-discrimination, loyalty and transparency, sustainability, diligence, confidentiality, and legality.

Fairness

All Recipients of the Code are required to act "ethically," which means acting according to the criteria of loyalty and fairness with all employees and stakeholders in general.

The principle of fairness implies respect for rights, including under the profiles of privacy and opportunities, and forbids any form of corruption to benefit anyone: the Recipients are required not to establish any privileged relationship with third parties in order to obtain their own advantages, such as donations, favors or utilities of any kind (which they must not, in their turn, make).

Non-discrimination

Marsina Engineering S.R.L. guarantees equal opportunities, avoiding any type of discrimination against its interlocutors.

Loyalty and transparency

Marsina Engineering S.R.L. and the Recipients undertake to establish a relationship based on loyalty, transparency, respect and mutual trust, principles founded on the truthfulness of

information both outside and inside the Company.

Sustainability

Marsina Engineering S.R.L. is committed to ensuring sustainable development with a strong focus on the health of the Earth and the social and economic wellness of people.

Diligence and conflict of interest

The relationship between Marsina Engineering S.R.L. and its employee is based on mutual trust. Recipients are therefore required to avoid any type of conflict of interest. In order to avoid this, every operation and activity must be undertaken only and exclusively in the interest of the Company and in a lawful, transparent and correct manner.

In cases where the possibility of a conflict of interest may be represented, Recipients are required to contact the Management so that the potentially conflicting activity can be evaluated.

In cases of violation, the Company will take all appropriate measures to put an end to the conflict of interest, reserving the possibility to act for its own protection.

Confidentiality

Marsina Engineering S.R.L. is committed to ensuring the protection and privacy of the personal data of the Recipients, in compliance with all applicable regulations.

On the other hand, Recipients are required not to use confidential information, acquired as a result of their work activity, for any purpose unrelated to the exercise of that activity; In particular, Recipients are required to maintain strict confidentiality on documents that may reveal know-how, transportation information, and business and financial information.

Legality

Marsina Engineering S.R.L. operates in compliance with the Law and this Code, and strives to ensure that all the staff operates in this way: people must behave in accordance with the Law and with ethical and moral principles, whatever the context and the activities performed.

This commitment must also apply to consultants, suppliers, clients and anyone who has relations with the Company.

Quality of services and products

As emphasized in the Company's Mission, Marsina Engineering S.R.L. orients its activities to the satisfaction and protection of its clients, guaranteeing continuous improvement in the quality of its products and services, monitored annually by an Integrated Management System that complies with UNI ISO 9001 standards.

2.2 Health and safety protection

Marsina Engineering S.R.L. being aware of the importance of ensuring the best conditions of health, hygiene and safety in the work environment, is committed to spreading and consolidating a culture of safety by using appropriate preventive actions, in order to preserve the safety, health and security not only of the employees, but of all those who visit its offices. All people must comply with internal rules and procedures regarding risk prevention and health and safety protection and promptly report any possible lack or non-compliance with applicable regulations. In particular, the Company provides information and training regarding this issue, also in accordance with the legal regulations, so as to avoid and assess dangers and risks. In addition, the Company is committed to conducting specific assessments of workplaces and work equipment.

The Company, in order to ensure the best working conditions for its employees, is committed to fully comply with applicable legislation, to engage in the prevention of accidents and work-related diseases, to create and maintain a safe working environment, compatible with the needs of individuals and provided with the appropriate equipment, to train and educate people regarding the risks and emergencies they may incur and the protective equipment available, and to prevent risk situations and any damage to people, goods and environmental resources, which may be determined by any reasonably expected cause within the Company's

2.3 Privacy Protection and Information Management

Regarding the processing of employees' personal data, The Company complies with the regulations contained in Legislative Decree 196/2003 art 7/13/23, excluding any kind of investigation into the personal lives of employees and collaborators. In cases where the regulations require it, individuals are asked for their consent to the processing of their personal data.

On the other hand, any information and other material relating to the Company's activities (such as information relating to clients/users and all those who deal with the Company), of which employees become aware or in possession, are strictly confidential and the exclusive property of Marsina Engineering S.R.L.

To this purpose, the Company guarantees confidentiality in the processing of data by adopting appropriate technical and organizational measures required by Eu Reg. 679/2016 GDPR.

2.4 Protection of company assets

Each recipient is responsible for the protection and preservation of entrusted company assets, tangible and intangible, and their use in a way that complies with company purposes..

2.5 Accounting and management protection

Every operation and transaction of the Company must be properly recorded, authorized, verifiable and adequate. The financial statements, reports, and corporate communications required by law must be prepared, in accordance with codified regulations and accounting principles, with clarity and transparency and give a true and fair representation of the Company's financial position and assets, and each employee is required to cooperate to ensure that management facts are correctly and timely represented in the accounting system. All documentation must be promptly and systematically filed so that at any time the relevant accounting background can be reconstructed. Any neglect, omission or falsification of which

employees become aware must be promptly reported to the Management. Those who are entrusted with the duty of supporting and preparing the financial statements and filing the related documentation are required to perform their job accurately, completely, truthfully and transparently. Any behavior designed to prevent or hinder the performance of control or audit activities is prohibited.

2.6 *Marketing activities*

Marsina Engineering S.R.L. undertakes through marketing campaigns (including online content publications through Social Networks) to provide only information that matches reality and to comply with the Privacy Law regarding any type of information related to clients, suppliers, employees, and all individuals who come into contact with the Company. The Company also undertakes not to carry out "spamming" actions on current and potential clients, to give the option of unsubscribing from mailing lists at any time, and to provide at all times information on how a user's data was found, and to equip itself with all the necessary technological tools so that, when sending e-mail communications, no files are attached that may contain computer viruses capable of damaging the contents of receiving computers or their e-mail systems.

3. CRITERIA OF CONDUCT WITH STAKEHOLDERS

3.1 *Relations with employees*

Each employee of Marsina Engineering S.R.L. is required to comply with the rules of this Code, without prejudice to the discipline of the working relationship governed by the employment contract and company regulations. It is the Company's policy to promote an internal climate of civil coexistence in which each employee interacts toward other colleagues in an honest and respectful way. Every human resource is expected to perform his or her duties in a responsible and diligent manner, and it is expected that everyone avoid situations of conflict of interest or other situations that could be potentially harmful to the Company.

Hiring of Personnel

The evaluation and selection of personnel are carried out on the basis of the match of the candidates' profiles with those expected and with the company's needs, while respecting equal opportunities for all stakeholders. Marsina Engineering S.R.L. undertakes to adopt all useful measures to avoid any form of favoritism in the personnel selection process using objective and meritocratic criteria, respecting the dignity of the candidates as well as in the interest of the good performance of the company. Marsina Engineering S.R.L. avoids any form of discrimination against its employees.

Employee management

Marsina Engineering S.R.L. promotes employees' participation in the life of the Company, providing participative tools capable of obtaining workers' opinions and suggestions, guaranteeing their greatest participation. The Company is strongly committed to fighting episodes of bullying and psychological violence and any behavior that is discriminatory or harmful to the dignity of the person. Relations between employees must be conducted with loyalty, fairness and mutual respect, in observance of the values of civil coexistence and personal freedom.

Working Environment

Marsina Engineering S.R.L. protects the health of its workers and ensures compliance with hygiene and preventive health regulations, striving to provide employees with a healthy and safe working environment. Safety in the workplace is ensured both by strictly implementation of the regulations provided by the current law and by actively promoting the culture of safety through specific training programs.

Formalization of the employment relationship

Employees are hired on the basis of regular employment contracts, as any form of employment relationship that does not comply with or otherwise avoid the provisions of current law is not allowed.

Promotion and Evaluation of Personnel

Marsina Engineering S.R.L. promotes the professional growth of collaborators by means of appropriate training tools and plans, allowing for possible opportunities for improvement and growth within the organization and individual professional skills. In no case shall evaluations give rise to discriminatory or punitive acts (exceptions are any sanctions resulting from infractions regulated within the company regulations).

3.2 *Relations with clients*

The Company is required to provide complete, transparent, comprehensible and accurate information so that, in setting up relations with the company, clients are able to make autonomous decisions aware of the interests involved, alternatives and relevant consequences. In particular, when formulating any contracts, The Company takes care to specify the relevant clauses in a clear and understandable manner. The Company, and its employees, are required to make consistent efforts to provide timely and high-quality services to clients, trying to limit any form of disservice or delay in order to maximize customer satisfaction, and to avoid any form of unfair or misleading behavior that may lead clients to rely on unfounded facts or circumstances. They are also required to put in place every

possible control so that clients are also able to comply with the basic ethical principles internal to this Code.

Without prejudice to the ethical, social and cultural principles that must shape the media, Marsina Engineering S.R.L. affirms the importance of achieving customer satisfaction with the products and services provided to them and is committed to facilitating interaction with clients through the prompt handling and resolution of any complaints and by making use of appropriate communication systems.

3.3 *Relations with suppliers*

Relations with suppliers are based on loyalty, fairness and transparency.

Suppliers are chosen on the basis of objective criteria of cost-effectiveness, expediency and efficiency. Selecting suppliers on purely subjective and personal grounds or, in any case, by virtue of interests conflicting with those of the Company is prohibited. In the selection, Marsina Engineering S.R.L. adopts objective and transparent criteria as required by current legislation and/or internal regulations, without precluding any supplier company that meets the requirements to compete for a contract with it.

The Company is required to implement every possible control so that even suppliers are able to comply with the fundamental ethical principles internal to this Code.

3.4 *Relations with external collaborators*

Collaborators and consultants of the Company are required, in the execution of the contractual relationship established or the assignment received from the same, to behave with fairness, good faith and loyalty, respecting the principles of this Code of Ethics, Company regulations and the instructions and prescriptions given to the staff of the Company under penalty of contract termination. Marsina Engineering S.R.L. selects its collaborators and consultants with absolute impartiality, considering as requisites only professional competence, organizational capacity, fairness and punctual execution of contractual obligations and assigned tasks.

4. SYSTEM OF INTERNAL CONTROL AND SANCTIONS

The Company undertakes to publicize the following Code to Recipients in the following ways: distribution of the Code of Ethics to all employees and publication on the company website.

It is obligatory for each Recipient to avoid conduct that is contrary to these principles, contents and procedures, and to report to their direct superiors any facts and circumstances potentially in conflict with the principles and prescriptions of this Code.

Compliance with the requirements of this Code is entrusted to the prudent, reasonable and careful supervision of each of the Recipients, within their respective roles and functions within the Company.

The Management shall take all necessary measures to put an end to violations, being able to use any disciplinary measure in compliance with the law and workers' rights.

The internal control system is oriented towards the adoption of tools and methodologies aimed at contrasting potential business risks, in order to ensure compliance not only with the law, but also with internal provisions and procedures.

In fact, violation of the principles fixed in the Code and the procedures indicated in the internal controls compromises the fiduciary relationship between the Company and its employees, consultants, collaborators in different titles, clients, suppliers.

All interested parties, internal and external, are required to report in writing and in non-anonymous form any non-compliance with this Code and any request for its violation, from whomever they may come, and the authors of manifestly unfounded reports are subject to sanctions. The Company protects the authors of reports against any retaliation they may be subject to for reporting misconduct and to keep their identity confidential, without prejudice to legal obligations.

With regard to employees, failure to comply with and/or violation of the rules of conduct indicated in the Code, constitutes a breach of the obligations arising from the employment relationship and gives rise to the application of disciplinary sanctions applied in compliance with the provisions of the Law, which will be dispensed according to the importance assumed by the individual cases considered and will be proportionate to their seriousness.

Finally, compliance with the rules of the Code of Ethics must be considered an essential part of the contractual obligations of employees, according to and for the purposes of the applicable regulations. Violations of the rules of the Code of Ethics may constitute a "breach" of the primary obligations of the employment relationship or a "disciplinary offense," with all legal consequences, including with regard to the preservation of the employment relationship.

Violations of this document may result in compensation for damages arising therefrom.

5. CONCLUSION

This Code of Ethics is approved by the Management of Marsina Engineering S.R.L. and will be appropriately updated. Any changes and/or additions to this code of ethics will be approved by the Management.