



CODE OF ETHICS

Introduction

The Code of Ethics expresses PlumeStars srl's commitments to operate not only in compliance with the laws and regulations in force but also in compliance with ethical principles and rules of conduct.

The application of the following principles is ensured by the presence within the PlumeStars of procedures aimed at ensuring that the employees, its bodies and third parties acting on its behalf, actually operate in compliance with ethical principles.

1- VALUES

This Code of Ethics expresses the principles to which the Recipients must adapt in carrying out the corporate mission and the following commitments clarify the aforementioned principles.

- **HONESTY**: in carrying out their work and professional activities, the recipients of this Code are obliged to comply with the legislation in force in the countries in which they are managed.

- **CORRECTNESS AND TRANSPARENCY OF THE MANAGEMENT SYSTEM**: PlumeStars srl pursues its corporate mission by ensuring adequate transparency of the decision-making processes and choices made. Consequently, the information activity carried out towards stakeholders (shareholders, staff, administrators, suppliers, customers and institutions) is also based on criteria of truthfulness and transparency to allow interested parties to make informed and aware choices.

- **CONFIDENTIALITY**: PlumeStars srl protects the confidentiality of the information acquired in carrying out its business.

- **COLLABORATION**: PlumeStars srl recognizes the importance of collaboration between directors, employees and coworkers and of the development of synergies between the various individuals participating in the business.

- **ENHANCEMENT OF HUMAN RESOURCES**: PlumeStars srl recognizes the competence and ability of individual members of the company as an crucial element for its development and therefore, promotes the enhancement of human resources through training and refreshing courses.

PlumeStars srl wants to clearly state that fairness and lawfulness in work and business are an essential value of the Company for the present and for the future.

2- ETHICAL PRINCIPLES

- *PRINCIPLE 1*: PlumeStars srl inspires its activity to the principles contained in this Code.
- *PRINCIPLE 2*: PlumeStars srl adopts to essential principle to respect the laws and regulations in force in all the countries in which it operates.
- *PRINCIPLE 3*: PlumeStars srl adopts the essential principle to respect the deontological provisions to which it has formally adhered.
- *PRINCIPLE 4*: The corporate bodies and employees of the Company must comply with the company policies and operating procedures.
- *PRINCIPLE 5*: The corporate bodies and employees of the Company have the obligation to promote the application and dissemination of the principles contained therein and to sensitize third parties who come into contact with the Company to respect these values.

3- ETHICAL PRINCIPLES AND RELATIONS WITH STAKEHOLDERS

Shareholders

- *PRINCIPLE 6*: PlumeStars srl has as an essential principle the enhancement of the financial investment of the shareholders in order to ensure adequate remuneration of the risk that the shareholders assume with the investment of their capital.
- *PRINCIPLE 7*: PlumeStars srl undertakes to ensure the correct management and external dissemination of information concerning the Company.

Staff

PRINCIPLE 8: PlumeStars srl ensures that the exercise of the business is based on principles of fairness and equal treatment and condemns any form of abuse of authority by anyone.

PRINCIPLE 9: PlumeStars srl requires that employees conform to the decisions taken.

a- Employees have the duty to carry out the tasks assigned to them correctly, diligently and on time.

b- Employees have the right to serenely express their dissent if they do not agree with the directives given by their superiors.

PRINCIPLE 10: All the activities of PlumeStars srl have as a prerequisite the respect for internationally recognized human rights.

a-PlumeStars srl is committed to protecting the physical and moral integrity of its employees and collaborators by ensuring working conditions that respect human dignity.

b- Any attitude and behaviour consisting in the carrying out of acts capable of endangering or violating the physical and moral integrity of other individuals is prohibited.

c- It is forbidden to engage in any behaviour of an intimidating, hostile or offensive nature.

d- PlumeStars srl condemns any retaliation, by anyone put in place, against employees as a result of their refusal to perform certain personal or professional services.

e- PlumeStars srl undertakes to strictly comply with all laws and regulations regarding the protection of work and against forms of irregular work or illegal immigration.

PRINCIPLE 11: employees must avoid any form of conflict of interest.

PRINCIPLE 12: The disclosure, in any form, of secret or otherwise confidential information of which an employee becomes aware during his or her work is prohibited.

PRINCIPLE 13: PlumeStars srl inspires the personnel selection process to principles of fairness and transparency and rejects any form of discriminatory behaviour.

PRINCIPLE 14: PlumeStars srl prohibits any form of discrimination in personnel management and undertakes to guarantee equal opportunities to all employees, evaluating them exclusively on the basis of personal qualifications and merit and the ability to perform.

PRINCIPLE 15: PlumeStars srl promotes the development and maximum enhancement of the talent, aptitudes and professional skills of employees.

PRINCIPLE 16: PlumeStars srl guarantees the confidentiality of employee data processed for corporate purposes, checking that any communication of the same takes place in a correct and authorized manner.

Representatives, Consultants and Collaborators external to the Company

PRINCIPLE 17: It is the duty of every representative of PlumeStars and of anyone acting on his behalf, to maintain the secrecy of the activity performed and of all the information that is provided to him or of which he has in any case become aware during the activity carried out.

The competitors

PRINCIPLE 18: PlumeStars srl inspires its conduct towards competitors on the principles of reality and fairness and, consequently, prohibits any activity of unfair competition. In particular, it prohibits any form of:

- Illegitimate use of the distinctive signs of others;
- Dissemination of false or inaccurate news or information aimed at discrediting the competitor;

- Use of force or others fraudulent means aimed at obtaining confidential information from employees or collaborators of competitors.

Furthermore, PlumeStars srl, as essential principle, requires the compliance with the antitrust laws in force in the countries in which it operates.

Customers:

PRINCIPLE 19: PlumeStars srl has the essential objective to maintain the loyalty and trust of customers by offering services and products of value in terms of price, quality, safety and environmental impact.

4- ETHICAL AND ENVIRONMENTAL PRINCIPLES:

PRINCIPLE 20: PlumeStars srl has as an essential principle compliance with the environmental regulations in force in the countries in which it operates. Furthermore, PlumeStars srl reconciles the conduct of its production and research activities with respect for the environment in which it operates.

5- PRINCIPLES AND RULES OF CONDUCT IN RELATIONS WITH THE PUBLIC ADMINISTRATION:

PRINCIPLE 21: PlumeStars srl, its bodies, employees, consultants and collaborators and, in general, the third parties who act on behalf of the Company in relations with the Italian or foreign Public Administration, must respect the principles of impartiality and good performance which the Public Administration is responsible for.

PRINCIPLE 22: PlumeStars srl prohibits any behaviour, by anyone on its behalf, consisting in promising or offering directly or indirectly money or other benefits to Italian or foreign Public Officials and / or Public Service Officers, from which it can derive for the Company an undue or illegal interest or advantage.

PRINCIPLE 23: The persons appointed by PlumeStars srl to follow any business negotiation, request or relationship with the Italian and/or foreign Public Administration, must not for any reason try to improperly influence the decisions of Public Officials or Public Service Officers.

PRINCIPLE 24: It is forbidden to allocate, for purposes other than those for which they were granted, contributions, grants or loans obtained by the State or other public body or by the European Union, even if of modest value and/or amount.

6- ORGANIZATION RULES:

PRINCIPLE 25: Every operation and/or transaction, understood in the broadest sense of the terms, must be legitimate, authorized, coherent, congruous, documented, recorded and verifiable at any time.

PRINCIPLE 26: Each corporate function is responsible for the truthfulness, authenticity and originality of the documentation produced and the information provided in carrying out the activity within its competence.

7- PRINCIPLES AND RULES RELATING TO SAFETY AND HYGIENE IN THE WORKPLACE:

PRINCIPLE 27: Under current legislation, PlumeStars srl undertakes all necessary measures to protect the physical and moral integrity of its workers. In particular, PlumeStars srl is committed to:

- the compliance with current legislation on workers' safety, hygiene and health is considered a priority;
- the risks for workers are avoided, as far as possible and guaranteed by the evolution of the best technique, by choosing the most appropriate and least dangerous materials and equipment and such as to mitigate the risks at source;
- the information and training of workers is widespread, updated and specific with reference to the job performed;
- the consultation of workers on health and safety in the workplace is guaranteed;
- the quick and effective deal with any safety needs or non-conformities that emerge during work activities or during checks and inspections;
- the organization of work and the working aspects of the same are carried out in such a way to safeguard the health of workers, third parties and the community in which the Company operates.

8- PRINCIPLES RELATING TO THE PROTECTION OF INTELLECTUAL PROPERTY:

PRINCIPLE 28: PlumeStars srl considers the intellectual and industrial property rights (patents, trademarks, copyrights and identification marks), which it owns, to be its essential assets and guarantees respect for the intellectual and industrial property of others. Furthermore, PlumeStars srl prohibits any act that could lead to loss, theft, unauthorized dissemination or improper use of one's own or others' intellectual property, or confidential information.

9- KNOWLEDGE:

PRINCIPLE 29: Through adequate training activities and other suitable dissemination tools, this Code must be brought to the attention of the Corporate Bodies, the Company's employees, consultants and coordinated and ongoing collaborators and any third party acting on behalf of the Company in relations with the Italian or foreign Public Administration. All the aforementioned subjects are required to learn its contents and to respect its precepts.

10 - MODIFICATIONS TO THE CODE:

PRINCIPLE 30: Any changes and/or additions to this Code must be made by promptly informing all representatives of the Company.