



CODE OF ETHICS

Code of Conduct and Business Ethics



Sinerga SpA, part of Sinerga Group which operates in the cosmetic and dermo-pharmaceutical field, has always based its activities on the principles of ethical integrity, in a way that made possible to equip itself and the Group with a Code that collects honorable values.

The aforementioned Ethical Code of Sinerga SpA and of the other companies part of the group bring together the principles and general rules of conduct to be observed in order to ensure smooth operation, reliability and good reputation of the companies.

Sinerga SpA, like all the companies part of the Group, is particularly attentive in promoting the application of the principles contained in the Code of Ethics to its activities, in the belief that ethical business conduct is critical to the success of the enterprise and also represents the best expression of its own image, the latest being a primary and essential value for the Group.

In drawing up its Code, Sinerga SpA also took into account the prevention and combating of illicit acts to which every Italian company is required by virtue of the rule LD. 231/2001.

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1. Introduction

SINERGA S.p.A. is pursuing its mission with transparency, moral integrity, neutrality, honesty and respect for the truth. All individuals who work with the Company, recipients of this Code, must comply with these principles. In particular, transparency and moral integrity must be understood as:

- Assumption of full responsibility for the consequences of actions undertaken;
- Conformity of the action and behavior with the regional, national and European legislation, including the laws of other nations, when working with them, with the prohibition to commit unlawful and other corporate crimes, against privacy (personal data), with particular attention to compliance with Safety and Environment mandatory regulations;
- Transparent and direct communication with the public and other parties with whom the Company operates.

2. General Information

This code is an official document which defines the principles inspiring the Company, the observance of which is essential for all the individuals operating with or for the Company.

It is an evolving document that can be improved and enhanced by all the recipients of this Code.

2.1 Scope of application of the Code

This Code has been redacted in order:

- To define behavioral standards and disciplinary criteria designed to prevent harmful conduct and to discourage environmentally damaging behaviors.
- To identify internal control measures in order to monitor the compliance with the code itself.
- To create value for the Company.

The objectives of the Code are of ethical, economic, cultural, legal and environmental nature, dictated by a precise social and moral commitment that the company has taken in order to be an example of conduct.

The adopted behaviors, thus, must be characterized by:

- The observance of the laws of this Code and, naturally, the national laws and constitutional principles;

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- The prohibition of any behavior or attitude that can facilitate, even indirectly, the performance of any illegal act or crime;
- The facilitation of daily operations in accordance with the established rules, making clear the nature of its own purposes;
- The execution of operational activities according with the principles of fairness, lawfulness, and transparency;
- The strictest confidentiality with regard to the work carried out;
- The harmonization of the goals with the needs of the community;
- The reinforcement of the confidence of the stakeholders, proceeding as follows:
 - I. Drawing up the budget and all the documents required in a clear, transparent, true and correct way;
 - II. Behaving properly, avoiding the Directors to act in conflict of the Company's and the stakeholders' interests;
 - III. Managing any information by fulfilling the requirements for confidentiality, integrity and privacy.

2.2 Recipients of the Code

The present Code of Ethics applies to all the Companies of Sinerga Group. The principles of this Ethical Code are binding on Directors, employees and on all those who collaborate with the Group on the basis of a contractual relation, even on a temporary base.

All employees and collaborators of the Company are subject to sanctions for any breach of the provisions of this Code.

All suppliers, consultants and partners of the Company are not bound and subject to sanctions, but the failure to comply with the principles contained in this Code could be a key factor in the choice of beginning or continuing the collaboration of the business relationships.

3. Code diffusion

All employees are informed of the existence of the Code of Ethics. The Code and its contents are posted in places accessible to all.

The Companies of the Group commit themselves to circulate this Code among the recipients through specific communication activities.

The provisions of the Code can be found on the Company's website.

All new employment or collaboration contracts and other agreements should contain a clear reference to the Code.

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4. Relevant values for the Company

The following values are fundamental and should be the reference for employees, collaborators, business partners and all those who have contractual relations with the Company.

4.1 Transparency, Honesty and Moral Integrity

Honesty represents the main principle for any activity of the Company and all relations with the stakeholders are characterized by criteria of collaboration, loyalty and mutual respect.

It follows that employees and company representatives must not unfairly pursue and achieve profits at the expense of clients.

For this it is prohibited:

- to unduly receive contributors, financing, facilitated loans or other allocations of the same type, by using or presenting false documents or through the omission of required information;
- to use grants, subsidies or financing provided by the European Union, the government or another public institution, including those of modest value and/or amount, for any other purposes for which they were requested and received;
- to undertake actions aimed at procuring, for third parties or for the Group Subsidiaries, any sort of profit (licenses, permits, relief of charges including of a social security nature, tax facilitations or non-payment of social security contributions, etc.) to the detriment of the Public Administration, through artifices or deceptions (such as, for example, the sending of false documents or documents making false statements);
- to undertake economic activities, confer professional positions, give or promise gifts, money or other benefits to public officials or public employees engaged in administrative proceedings which may bring benefits to the Company;

During the trading activities of public contracts, no employee or collaborator of the Company may:

- promise or offer money, gifts of any nature or other benefits to managers, officials or employees of the Public Administration or their relatives, in order to influence the independence of judgement of such public officials or to induce them to secure undue advantages.

- Exchange information or enter into agreements or understandings with competitors, customers, suppliers or other third parties that improperly influences the perform of the Company activities;
- Submit false documents or artfully formulated, attest nonexistent requirements, or give untrue guarantees.
- Violate the Company's institutional policy by adopting behaviors involving bribery.

4.2 Responsibility for the safety and health of its employees

The Company works to identify, mitigate and monitor existing and emerging risks to the health and safety of its employees and others who visit or work on its premises, respecting without exception all the mandatory regulations.

For this purpose:

- it proactively reduces the potential for exposure to chemical, biological, physical and other hazards in the workplace;
- it guarantees a specific and systematic control of the health state by periodical tests established by the health protocol;
- everyone is expected to integrate safety, health and environmental considerations into their day-to-day work activities and use the individual DPI.

4.3 Responsibility in the management of communications and personal data treatment

The Company is managed according to the values of substantial and procedural fairness, transparency and accountability, assuring: efficiency, transparency and traceability of the transactions and, more in general, the Company is managed according to the values of fairness and transparency, fulfilling all the legal obligations. Moreover, the Company must protect its own social asset, its property, the creditors, the backers and all other stakeholders.

Social communications should be clear, truthful, fair and transparent. All the individuals who take part in the development of data contained in balance sheets, corporate reports and all the social communications established by the law should comply with such principles and check the correctness of the information carefully.

Performing its business activities, the Company collects a significant quantity of personal data and confidential information, which it undertakes to process in compliance with all applicable laws and according to the best practices in matters of confidentiality and privacy.

The Company respects the subjective right of persons concerned to the protection of their personal data, whether they be employees, clients or suppliers, providing them with complete and updated information on the processing of such data – both ordinary information and any sensitive information – acquired by the Company itself or to be acquired and/or processed in the course of its activities, requiring their consent whenever necessary and processing such data exclusively for the purposes for which it is intended.

Furthermore, the Company guarantees not to diffuse or make unauthorized use of the information acquired, even after the termination of the business relationship.

4.4 Correct use of IT and communications systems

Each employee is obliged to diligently safeguard and use company equipment made available to them for the performance of their duties, acting responsibly. Occasional limited use of company resources, e.g. IT equipment, office supplies and phones, for personal purposes is acceptable if in compliance with the law and internal policies and practices.

People concerned are required:

- not to forward internal communications or confidential materials outside of the company, unless there is an authorization to do so.
- to respect the intellectual property law. Downloading, duplicating or redistributing copyrighted material, including music, movies, images or software, may violate laws or regulations in force in many countries and can lead to legal or disciplinary proceedings. Perform these tasks only if legally authorized.
- to keep secret the user IDs, passwords and authentication devices.
- to be careful when opening files attached to e-mails, especially those not related to business matters or coming from an unknown source.
- to not intentionally compromise or tamper with the controls and safety systems of the Company.
- to avoid superficial statements, exaggerated or inaccurate information that could be misunderstood or used against the Company in legal proceedings.
- to not send, download or access content or inappropriate information that could be offensive, insulting or harassing to other people, such as sexually explicit messages, distasteful jokes or ethnically and racially detractions.

4.5 Correct use of company assets

Collectively, employees have the responsibility of safeguarding and making proper and efficient use of the Company's property. All the recipients of this Code also have an obligation to prevent the Company's property from loss, damage, misuse, theft, embezzlement or destruction. Theft, loss, misuse, carelessness and waste of assets have a direct impact on the Company's profitability and may jeopardize the future of the Company. Any situation or incidents that could lead to the theft, loss, misuse or waste of Company property should be reported immediately to the security department, to supervisors or managers as soon as they come to attention.

a) Proper use of company assets

As a general rule, Company assets should only be used for the benefit of the Company, not for any personal benefit. That said, it is important to use the common sense when judging appropriate use. For example, while the occasional phone call or email from the workplace is acceptable, excessive internet surfing, phone calls or email is a misuse of assets. Further, any person having access to certain Company assets, such as a car or wireless device, should refer to local policies to ensure the assets used as intended.

The misappropriation of the Company assets is a violation of the duties to the Company. The takeaway from the headquarters of the Company's own property without permission is regarded as theft.

The Company's properties are to be guarded with care. In addition, carelessness and waste of assets owned by the Company may be considered a breach of its obligations to the Company.

Anyone becoming aware of a shortfall, theft, misuse, damage or waste of corporate assets or having any questions about their correct use, should speak with the management.

b) Return of company assets

In the event of termination of the employment relationship with the Company one is required to interrupt the use of all company assets in possession and to return them.

Company assets include, but are not limited to:

- Information systems, equipment and technologies (including laptops, tablets and mobile devices);
- Phones;
- Business plans;
- Intellectual property assets, such as software code, licenses, ideas, concepts, content and inventions;

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- Lists and information on customers, suppliers, including information on finding customers or trading;
- Office supplies;
- The name Sinerga, our various brand names and logos.

The Company's assets include all circulars, notes, lists, data and other documents (in paper or digital form) produced by all employees and third parties in relation to business activities.

4.6 Liability for Environmental protection

The Company develops its business in the utmost compliance with the current environmental regulations, also taking into account the development of scientific research and best experiences in that field, so as to search for the compatibility between economic initiative and environmental needs.

The Company promotes behaviors and activities aimed at reducing its impact on the environment and is actively engaged in the constant adjustment of its manufacturing sites to the best reference practices.

For this purpose should be properly managed and recorded all the activities the related to:

- Production and waste disposal (operate in accordance with the rules of differentiation, characterization and disposal);
- Atmospheric emissions (operate in accordance with the rules of use, control and record of the analysis of the emissions);
- Liquid effluents (operate in accordance with the rules of purification and use of water, punctually recording check analysis);
- Energy Management (operate in accordance with a good management of the air-conditioning systems, in order to optimize the use of non-renewable energy).

4.7 Discrimination

The Company is committed to create and maintain a work environment which promotes equal opportunity so all individuals are treated with respect and dignity and where illegal discrimination, including sexual harassment, does not occur. Sexual harassment, whether verbal, physical or environmental, and whether in the workplace itself or in outside work-sponsored settings, is not acceptable and will not be tolerated.

Sexual harassment is specifically prohibited by law and this Policy will be enforced diligently.

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It is not easy to define exactly what actions or course of conduct will constitute sexual harassment in any particular case because it will depend on the specific facts and circumstances, including how pervasive, abusive or serious the behavior is.

Examples of inappropriate behavior which may constitute sexual harassment include, but are not limited to:

- coerced sexual acts;
- express or implied demands for sexual favors in exchange for favorable reviews, assignments, promotions, continued employment or promises of continued employment;
- unwelcome sexual advances;
- touching or assaulting an individual's body, or staring in a sexual manner;
- graphic, verbal commentary about an individual's body or sexuality;
- repeated sexual jokes, sexual language, sexual epithets, sexual gossip, sexual comments or sexual inquiries;
- repeated and unwelcome flirtations, advances, or propositions;
- repeatedly asking a person working for the Company for a date after the worker has indicated that he or she is not interested;
- sexually suggestive or obscene comments or gestures;
- the display in the work place of graphic and sexually implicit or suggestive objects, pictures or graffiti, including those posted from the internet onto a PC monitor;
- negative statements or disparaging remarks consistently targeted at any gender, even if the content of the verbal abuse is not sexual in nature;
- retaliation against a person working for the Company, for complaining about any of the types of behavior described above.

The types of behavior described above are only examples of prohibited harassment behaviors and are unacceptable not only in the workplace, but also in other work-related settings such as client offices, business trips or business-related social events.

4.8 Policy towards employees

The Company acts in compliance with its own principles and promotes its values among its employees. Therefore, it commits itself to create a serene working environment, where everyone can work in agreement with the law, the principles and the shared ethical values. The Company through the person in charge ensures that its employees and collaborators behave



and are treated with dignity and respect in accordance with the laws provided by the legal system.

The Company prohibits the application of disciplinary sanctions against employees or collaborators that lawfully refused an unduly work request or who have refused to engage in behavior that is contrary to the principles expressed in this Code.

The Company is against undeclared work, so every employment and collaboration relationship must respect the mandatory regulations. All employees and consultants are informed of the rights and the obligations resulting from the signature of the contract in harmony with the requirements of the Employment Law and the ideas expressed on this Code.

The Company values the professionalism of its employees and collaborators, supporting their formation with the intent to develop specific skills.

5. Forced and child labor

Sinerga is against all forms of forced and compulsory labor.

The Company does not accept the involvement of children in its activities, except in circumstances permitted by law and that protect their welfare.

6. Liberty of Affiliation

Sinerga respects the right of employees to freedom of association and collective bargaining. Wherever there is a representative body, the Company is committed to maintain an open dialogue and a relation based on mutual trust. Where is possible there is an effort to keep a proactive approach towards employee representation bodies in concrete projects related to their interests.

7. Promotion and Talent development

Sinerga recruits and promotes people based on their suitability for the position in question and to the contribution they can provide in the future; recognizing the value that people can represent for the Company.

The Company does not tolerate any kind of discrimination during the hiring procedures, as a result of that all the applications in line with the researched profile will be taken in consideration without any distinction between them.

The Company adopts the measures necessary to benefit from the effective and efficient sharing of knowledge within and between work groups, encouraging people to constantly improve and further develop their own competences.

The Performance Management Process also encourages timely and fact based feedbacks, regularly promoting opportunities to discuss about development. Sinerga offers continuous formation and growth opportunities through formal programs and "on the job" experiences.

8. Relations with the public and judicial authorities

The Company acts in accordance with the law and favors, on the limit of its own competences, the correct administration of Justice. This demands that all the employees and collaborators should demonstrate maximum assistance and collaboration to inspectors from the Social welfare and Social security institutions, Local Health Agency or any other Public Authorities for supervision and administration.

In case of any legal proceedings, investigation or inspection by the Public Administration, no one should destroy or alter records, minutes, accounting records and other documents, nor lie or make false declarations to the competent authorities. No one should try to persuade others to provide false or misleading information to the competent authorities. No one should engage in economic activities, establish professional assignments, give or promise gifts, money, or other benefits to those responsible to carry out the checks and inspections, or rather to the competent authorities.

Anyone under investigation, inspected or that received notifications for subpoenas or other legal measure (due to actions related to the job or even personal matters), must inform the Management.

9. Conflict of Interest

In order to respect the principals of fairness and transparency, guaranteeing in this way the trust of its own Clients and Stakeholders, the Company must ensure that its employees, administrators, representatives or collaborators won't be held in a position of conflict of interest.

The decisions and actions taken by the Company's employees and collaborators must be oriented to achieve the best possible advantages for the Company (in respect with the requirements of this Code) and also pursue social development.

The Company establishes the following rules:

- the administrators can't accomplish or collaborate with any operation activity (or to participate in its deliberations) in organizations that have a competing interest, even if only partially, with that of the Company;

- The Company’s employees and collaborators can’t conduct business or other professional activities that compete, even only partially or indirectly, with the Company’s interest and with the goals pursuit by it, indicated in its own deed of incorporation and cited on this Code.

All the Company’s employees and administrators must avoid and prevent a conflict of interest. Anyone who becomes aware of even just the possibility of a conflict of interest must immediately inform the Management. Each employee and collaborator, in power to conduct negotiations with other parties on behalf of the Company, must inform the Management in case there is a possibility of a conflict of interest.

10. Corruption

The Company, in order to respect the principle of fairness and transparency and to bring the best possible advantages to its activities, ensures itself that its employees, administrators, representatives and collaborators aren’t passive or active participators of corruption. The mentioned individuals must not violate the obligations and the duties of their office to receive (or because they have already received) promises of money and other advantages. The Company also prohibits employees or collaborators to receive any benefit or advantage even in the form of promises.

During the negotiations of a deal, the Company’s representatives should not only search for the best advantages, leaving aside its own private interest, but should also not accept any promise in regard to personal advantages (money, assets, services, future job opportunities...), neither should any of their decision be impacted by this promises. Receiving gifts is specifically prohibited if the gift is in the form of cash or cash equivalents (e.g. gift cards) that could be construed as a bribe.

11. External Relations

The Company, to protect its own image and the fairness of the information released, states that:

- No employee or collaborator can release to non-qualified and outside parties (other than public officials), statements on behalf of the Company that have been defined as confidential or information about other Companies that can be damaging to them;
- Any employee or collaborator who was asked to share information concerning the Company, confidential or not, that may cause damage to it, must inform the Management.

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11.1 Relationship with the Customer

The Company offers products that guarantee the highest standards of quality and security required by the market, in compliance with the current regulations and according to the criteria of fair competition.

The satisfaction of its customers and the success of their products is a maximum priority for Sinerga in the development of its daily activities. Therefore Sinerga always works in order to offer constant improvement on its services to its customers, in terms of:

- assistance and exchange of detailed and professional information;
- products of proven quality and competitiveness;
- support and regulatory consultancy for the best performance of the product's claims;
- information and support when releasing products on the market;
- constant internal training, formation and update in order to offer a service in line with the latest trends and regulations.
- guarantee of collaboration with qualified external suppliers, who share the ideas presented on this Code and who work with a proactive attitude to achieve the full satisfaction of the customers' needs.

11.2 Relationship with Suppliers

Sinerga considers its own suppliers true partners with whom it shares the needs and expectations of its clients. The long and concrete collaboration between Sinerga and its suppliers secures a trustworthy commercial relation characterized by mutual intents.

At the same time, in order to maintain a high level of competitiveness, Sinerga is constantly engaged in the research and the selection of new suppliers who can contribute to the Company growth. The selection and choice of the suppliers comes after a very accurate evaluation, audit of the expertise and headquarters/manufacture plants of the supplier, in order to verify the actual quality and reliability of their products.

Sinerga undertakes to inform and raise awareness among its suppliers about the content of this Code.

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12. Implementation Procedures

The recipients of this Code are required to conduct their activities in compliance with all the rules established by the Board that form the Management System. In order to guarantee the correct interpretation and application of this Code of Ethics and Behavior Guide, the performance of its operational and disciplinary procedures, the Management, in the person of Fabio Perego, performs the task of supervise the compliance of regulations, operation and update of the Company's Management System.

All the Company's employees and collaborators, who become aware of transgressions of this Code or the law, are obliged to promptly inform the Management.

Any violator of any single rule of conducts prescribed by this Code can be punishable by disciplinary action, up to and including termination of employment relationship or of the collaboration agreement. Sanctions will be applied in compliance with the provisions of the collective national labor agreement (CCNL). Sanctions will be proportionate to the severity of the violation.

Gorla Maggiore, 07.14.2016

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The Management



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