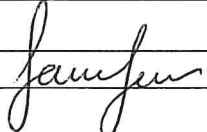
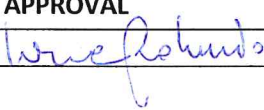

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CODE OF ETHICS

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ISSUE	DIRECTION APPROVAL
signature 	signature 

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1. PURPOSE

This code of ethics has been written to define our fundamental ethical values, so that they can be the basis for our company culture and the standard of behaviour for all of our partners during their activities, in compliance with the requirements of RJC.

2. INTRODUCTION

Eurotecnica srl is a company which designs, manufactures and distributes products and machinery for surface treatment and finishing. Eurotecnica srl has become one of the leading companies in its field thanks to our constant customer care, quality and good staff, together with an always ethical behaviour. We are proud to embrace RJC policies and code of ethics.

3. BUSINESS MANAGEMENT ETHICS

We are committed to:

- performing our activities with the utmost respect for ethical norms and guaranteeing integrity and transparency in compliance with applicable laws.
- Avoiding corruption and extortion in every economic transaction since it could compromise the principles of fair competition or influence the course of business or decision-making processes.
- Not offering, accepting or allowing any payments, gifts, hospitality, expenses or promises which could compromise the principles of fair competition or be used to establish or maintain business relationships, or influence their course or decision-making processes.
- Declaring the characteristics of the products we sell in a clear and detailed manner.
- Taking action to guarantee the integrity and safety of our products inside our company and during shipments to prevent theft, damage or substitution, always giving priority to people's safety over product.
- Respecting principles of confidentiality and personal data protection.
- Respecting values such as equity and equality, personal safety, diligence, transparency, honesty, confidentiality, impartiality and health protection.

4. TRANSPARENCY OF ACCOUNTING INFORMATION AND FINANCIAL COMMUNICATION

We use a reliable administrative and accounting system to identify, prevent and handle financial and operational risks and fraud against the company, when possible. Every operation must be based on correct documents and be verifiable. All accounting records, which are the basis for preparing financial statements, must be written in a clear, true and correct way and kept safely by those in charge of them.


5. ANTI-MONEY LAUNDERING

We are committed to avoiding facilitating criminal and terrorist organizations and activity, not even potentially. We do not allow cash payments over the legal limit.

6. HUMAN RIGHTS

We respect the fundamental human rights and dignity of every single person, as stated in the Universal Declaration of Human Rights adopted by the UN.

- We do not employ minors in compliance with Recommendation no. 146 and Convention no. 138.
- We do not use forced labour or bonded labour and we do not employ convicts or limit the freedom of movement of our employees.
- We comply with workplace safety laws.

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- We do not limit freedom of association.
- We do not discriminate on the basis of ethnicity, class, birthplace, religion, disability, gender, sexual orientation, union membership, pregnancy, political party membership, marital status, physical appearance, age or any other characteristics. All people fit for work are given equal opportunity without being discriminated against for factors which have nothing to do with their ability to complete their tasks.
- We do not use corporal punishment or inflict degrading treatment, such as harassment, abuse, coercion or intimidation in any circumstances or forms.
- We comply with existing laws on working hours and salary. When legal requirements are absent, we will comply with industry regulations.

7. ENVIRONMENTAL PROTECTION

We comply with existing laws on all environmental aspects applicable to our industry.

8. RULES OF BEHAVIOR

8.1 Employee relations

We offer constant training in carrying out specific tasks and holding employees responsible with regard to rules of behaviour.

We encourage and promote a sense of belonging among employees in order to create a spirit of cooperation and exchange of professional knowledge.

In order to honour the company's commitments, employees are expected to:

- Put maximum effort into training activities;
- Act responsibly with regard to personal and family leaves, in order to establish a relationship of mutual trust with the company;
- Behave correctly and professionally towards their colleagues and avoid competitive and unethical behaviour.

8.2 Health and safety protection

We are committed to ensuring a healthy and safe workplace and protecting the physical and moral integrity of every employee by providing the highest levels of accident protection and prevention and improving safety measures constantly.

8.3 Equal opportunities


We do not accept any forms of discrimination on the basis of ethnicity, class, birthplace, religion, disability, gender, sexual orientation, union membership, political party membership, marital status, physical appearance, or any other characteristics. All people fit for work are given equal opportunity without being discriminated against for factors which have nothing to do with their ability to complete their tasks.

9. RELATIONSHIPS WITH SUPPLIERS AND BUSINESS PARTNERS

9.1 Transparency in selection

We choose our suppliers and business partners based on meritocracy, particularly on professionalism, stability and cost-effectiveness and we apply internal procedures in order to ensure the highest level of traceability and transparency.

We will apply a correct due diligence which takes account of the counterparty risk before establishing any business relationship. We will monitor transactions constantly to evaluate the risk of contributing to conflicts, money

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laundering, terrorism financing, and serious human rights violations such as torture, cruel, inhuman and degrading treatment, any form of forced labour, illegal and/or unacceptable forms of child labour.

We will immediately end all business relationships with clients and suppliers if there is a reasonable chance that they are connected to the violations previously mentioned.

We will keep documents relating to counterparties and gold and platinum transactions to prove that a correct due diligence has been applied.

10. MARKET RELATIONSHIPS

In order to pursue our mission we comply with fair competition and transparency regulations and treat our competitors in a serious and cooperative way.

We handle sensitive information about our company, clients, suppliers, partners and competitors in strictest confidence and in compliance with relevant law.

11. RELATIONSHIPS WITH PUBLIC ADMINISTRATIONS

We are committed to ensuring the highest level of integrity and transparency with supervisory authorities, magistracy and generally with any public official.

12. HOW TO ACT

All recipients of this code are expected to:

- contribute actively to make sure this code is followed within the limits of their skills and roles;
- Know and observe the principles and contents of this code with regard to their specific tasks and roles;
- Comply with all internal rules to implement this code or to identify violations;
- Report presumed violations of this code.

Managers, directors or people with responsible positions must set an example for their subordinates and make sure they are aware that their tasks must be always carried out in compliance with this code's principles.