



CODE of ETHICS

Approved by Chromavis Board on
March, 25th 2019

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INTRODUCTION

Chromavis S.p.A aims to satisfy the needs of every client in as complete a way as possible. The company has set itself the mission of creating made-to-measure solutions and guiding the client with its experience and a spirit of innovation.

Chromavis has always undertaken to respect the fundamental values of honesty, diligence, responsibility, correctness, loyalty, integrity, transparency and mutual respect with regard to all the parties concerned, starting from its employees. This undertaking is translated into the respect of legislation and regulations on social, environmental and tax matters, fair competition and anti-corruption. The same undertaking is also required from every subject that is in relation with **Chromavis**.

CHROMAVIS AND ITS EMPLOYEES

Chromavis places value on its human resources as a factor of fundamental importance for its entrepreneurial activity. The management of human resources is based on the respect of the personality and professionalism of each person without discriminations of gender, age, race, class, national origin, religion, disability, sexual orientation, trade union membership or political opinion.

Health and safety in the workplace

Chromavis and its affiliated companies undertake to guarantee a healthy and safe workplace, minimizing the risks and the threats present through measures for the prevention of accidents and regular and documented training on Health and Safety.

Harassment

Chromavis does not allow harassment of any kind whatsoever, whether moral, mental or sexual, to and from any level in the company, in internal and external work relations.

Child labour

Chromavis supports children's rights and condemns the use of child labour in conformity with the Conventions of the International Labour Organization (ILO).

Associations and Trade Unions

Chromavis ensures the right of every worker to join and to form trade unions of their choice and the right to collective bargaining.

CHROMAVIS IN BUSINESS

The company recognizes customer satisfaction as the fundamental element for the success of its business. This central objective is subordinate to the principles of legality, honesty, correctness and transparency.

Quality and safety of the products

Chromavis attributes priority importance to the safety and quality of its products. A selection of the raw materials and of the packaging is made to ensure the respect of the regulations of the countries where the product are to be sent. This is followed by a meticulous sequence of tests to which the finished products are subjected.

Protection of competition

Chromavis believes that competition is correct and fair and a fundamental element for its development. In disputing market shares, it chooses to operate in the respect of the principle of integrity and the respect of legislation on competition and anti-trust laws.

Money laundering and legality

The company rejects any form whatsoever of money laundering from unlawful or criminal activities, undertaking to respect all the national and international provisions on money laundering.

In the same way, any form whatsoever of corruption, infringement of trust and undue appropriation is prohibited and cannot be tolerated. Offering, directly or indirectly, money, gifts or benefits of any nature whatsoever, personally, to suppliers, to employees of the Public Administration, to third parties from whom undue advantages may be obtained, is strictly forbidden. Acts of commercial courtesy are allowed on condition that they are of modest value and such as not to compromise the integrity and the reputation of one of the parties and not to influence the autonomy of the judgement of the recipient.

Only duly designated and authorized company functions may enter into commitments with the Public Administration and with public institutions.

Relations with suppliers

The relations with suppliers are based on principles of transparency, loyalty, integrity, confidentiality, honesty, diligence, professionalism and objectivity of judgement. The selection of suppliers is made on the basis of an objective and transparent assessment. Chromavis undertakes to ensure maximum vigilance with all the suppliers in relation to the observation of the Code of Ethics.

Accounting and management accuracy

Chromavis ensures that every transaction is based on adequate documentation and can be verified. The principles assured in accounting and management are those of correctness, completeness and transparency, fully complying with the legislation currently in force.

CHROMAVIS AND SOCIAL RESPONSIBILITY

Chromavis considers Corporate Social Responsibility an integral part of the operating and managerial policy of the company. In particular, some of the topics to which Chromavis is committed are:

Conflict Minerals

Conflict Minerals include gold, tungsten, tin, tantalum and their derivatives. If they are extracted from the Democratic Republic of Congo (DRC) or neighbouring countries (DRC Conflict Minerals), they could finance the violent conflicts in Central Africa. Chromavis undertakes to act in a socially responsible way, by not purchasing products that the supplier cannot certify as "DRC Conflict-free", according to the Conflict Minerals Rules. The supplier who finds origins that are potentially at risk is required to promptly notify Chromavis.

Fight against slavery

Chromavis collaborates actively for the repression of any form whatsoever of slavery and in particular of "modern slavery" (human trafficking, forced labour, indentured labour, sale and exploitation of minors). The respect of human rights is recognized as the fundamental principle which anyone who collaborates and/or comes into contact with Chromavis must abide by.

Environmental sustainability

Within the limits of its business, Chromavis is inspired by the principle of protecting the environment. The company intends to ensure full compatibility of its activities with the local area and the surrounding environment. The decisions taken in this direction concern reducing the impacts of environmental pollution, reducing the production of waste and increasing the purchase of raw materials containing only sustainable Palm Oil. Chromavis encourages all the parties concerned to implement actions aimed at respecting and supporting the environmental resources.

Chromavis asks all its suppliers and employees to respect the principles and policies in this Code of Ethics.

In the event that they were to find any situations potentially in disagreement with this Code, they are promptly obliged to notify the company through the supervisory body which can be contacted at the email address odv@chromavis.com.