

Code of Business Conduct and Ethics



FINDER

POMPE

Code of Business Conduct and Ethics

Ever since 1952, Finder Pompe has run its business with a strong commitment to comply with legal regulations and ethical behaviours.

We have deemed it helpful to formalise in the Code of Business Conduct and Ethics the identifying qualities through which we wish to be acknowledged by the market. Through the formalisation of our corporate culture and of our values within the Code of Business Conduct and Ethics, we can convey information outside the company about the care that everyone in Finder Pompe devote to ethics, to integrity, to uprightness and to the company's reputation.

The Code of Business Conduct and Ethics represents an important tool in order to be identified as reliable partners by our customers, suppliers and shareholders; we are all expected to confirm these integrity values through the actions we daily carry out.

In the event of any doubts or question concerning the Code of Conduct, please refer to your Manager, to the Human Resources Department or to the Supervisory Body pursuant to Legislative Decree 231/2001. The company management is not only responsible for its actions, but for the development of a corporate culture in line with the guidelines of the Code of Business Conduct and Ethics: ethics, integrity and trust are at the heart of the values that characterise our company, and all employees are expected to live by such values every day.

The code of ethics is an integral part of the form pursuant to the Legislative Decree 231/01. We ask you to kindly use the Code of Business Conduct and Ethics as a basis and a resource for preserving our ethical culture.

Kind regards,

The Management of Finder Pompe – a Division of Gruppo Aturia S.p.A.

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1. Accessing the Code of Ethics

The Code of Business Conduct and Ethics is available on our internet website: www.finderpumps.com

In order to access the code of ethics :

- Go to the website www.finderpumps.com
- From the main page, click on “Download”
- Select Code of Business Conduct and Ethics
- For any questions concerning the code of ethics, please send an e-mail to the address: HR@finderpumps.com; or else directly contact your Manager or the Human Resources Department or the Supervisory Body pursuant to Legislative Decree 231/2001.

Furthermore, the Code of Business Conduct and Ethics is at all employees disposal on the Company server, in the LAN folder: “procedure aziendali”. A copy of the Code of Ethics can be looked up in the Offices and in the Workshop boards.

2. Purpose

Honesty, integrity, fair business practice, human and labour rights, safety and environmental care are the key factors that lead us in our daily activity. Our Code of Business Conduct and Ethics is meant to be a guide to help us making sound business decisions and to operate on the market in the right way.

Every day, each of us has the power to impact the reputation that our company has acquired on the national and international markets. The behaviour rules included in the code of ethics lay down the guidelines required to continue to act in line with professional integrity and ethics. The behaviour rules will help you live according to the company principles and values, and equally apply to all company staff at all levels.

Behaving in compliance with the company rules is not simply an option, as possible non-compliances may cause serious consequences for us all and for our Company.

Everybody within Finder is involved in implementing our ethical culture, no matter the role or the function performed.

In view of this, we cooperate only with those business partners – distributors, suppliers, sales agents, consultants - sharing the same beliefs and working in a way consistent with our Code of Business Conduct and Ethics.

All activities carried out by the Company are subject to the laws and regulations of each Countries in which it operates. No behaviours that violate the laws may be adopted under no circumstances.

3. Human Rights and Fair Labour Conditions

In Finder Pompe we respect the personal dignity, privacy and rights of each individual. We are committed to keep a work environment free from discriminations and harassment. We absolutely comply with applicable labour and employment laws: fundamental workers’ rights are respected to ensure their freedom of association, no use of child labour, forced or prison labour, we grant equal opportunities, fair wages, regular employment and working hour. Additionally, no discrimination, whether for religion, race, political beliefs, nationality reasons, would be tolerated. We believe that diversity within our workforce could enrich our culture.

Any form of harassment – sexual, physical or psychological, whether explicit or implicit – or mobbing would not be accepted either.

In carrying out your tasks, always use common sense and avoid any actions that may question compliance with the law or with the Code of Ethics.

4. Health and Safety in the Workplace

Finder Pompe is committed to create a safe workplace.

Our position, in order to reach our health and safety objectives, involves:

- Complying with the laws and regulations governing safety.
- Implementing health and safety management systems in line with the sector's standards at an international level.
- Guaranteeing that all the staff members involved receive minimum mandatory training but also additional training and advice in order to allow them to carry out their work in a safe manner and with no danger for their health.
- Developing a relevant "safety culture" within all areas and department.
- Cooperating with our customers, partners and suppliers in building a common safety management system for each project.

It is fundamental that everyone within Finder knows and follows the safety policies, procedures and laws. Adequate steps are regularly taken to prevent accidents and injury to health occurring during the work activity. Comply with labour safety procedures and use the personal protection equipment made available. Finder has in place a system to manage Health & Safety according to the international management system OHSAS 18001.

5. Environmental Responsibility

Finder pays a great attention to follow environmental practices that help protecting the environment, its employees and the community in which we operate.

Great efforts are paid to minimize the impact on the environment and to comply with all applicable laws and regulations. Everyone within Finder is trained about environmental issues in order to raise awareness about the importance of recycling, reducing consumption and respecting the environment.

The management's commitment is a critical factor as regards the achievement of success in pursuing these goals.

In order to attain these objectives, we need to follow the guidelines listed below:

- Comply with the environmental legislation in force, by implementing environment managements systems complying with the regulations.
- Lay down clear and significant objectives in order to constantly improve the environment management system, by highlighting key indicators.
- Responsibly act in compliance with the environment management systems and make all workers aware, so that they devote care to environmental problems as an integral part of their everyday life.
- Use and develop our technical knowhow to reduce the environmental impact of the products that we are to design, manufacture and develop together with our customers.
- Finder is certified ISO 14001:2015.

6. Quality

Finder Pompe aims at being a leader in its sector, with the maximum creation of value for its customers and with maximum care in protecting its employees and the environment in which they live, through excellence in preparing and managing offers, orders, projects and contracts. Our quality objectives are:

- A corporate culture based on the highest quality standards, constantly improving.
- A quality management system focused on the objective of operating excellence.
- Guaranteeing that our subcontractors apply quality standards that are consistent with those of Finder Pompe
- Making available adequate resources and carrying out training activities so as to guarantee that the activities are performed in a safe and professional manner
- Ensuring that all quality-related accidents are duly investigated and that corrective measures are taken.

7. Business Ethics

Finder Pompe is committed to conduct its business in full compliance with the laws, rules and regulations of the countries where it operates.

Finder carries out its activities with honesty and integrity and does not accept any form of corruption. Offering, paying, accepting bribes that could influence or appear to influence anyone's decision in relation to the current business activity, whether to public or private third parties, is against our values, besides violating anti-corruption laws. This practice would expose Finder to criminal liabilities and penalties. Bribes may include money, gifts, travel, entertainment, favours, business opportunities, political contributions.

When a gift is delivered to any Finder employee, the receiver has the responsibility of immediately reporting to his/her supervisor; gifts whose value exceed 10€ should be left within the Company's possession.

Finder respect anti-trust and other competition laws, trade controls and sanctions regimes.

Finder complies with the rules related to fair competition and fair trading; it participates in a fair way to tenders.

8. Bookkeeping

The company's accounting system must guarantee accounting transparency by being grounded on the truthfulness, accuracy and completeness of the information entered. Each member of the company is to cooperate, within his/her own sphere of competence, to ensure that management-related facts are accurately and timely presented in book entries.

No behaviours are allowed that may cause prejudice to the transparency and traceability of the balance sheet information.

For each transaction, adequate supporting documentation for the implemented activity is kept on file, so as to allow:

- Easy and timely book entry.
- Identification of the various levels of responsibility and task allocation.
- Accurate reconstruction of the transaction, also to reduce the probability of material or interpretation mistakes.

Each entry must exactly reflect the information provided in the supporting documentation. It is the responsibility of all Finder Pompe employees to ensure that the documentation is easily traceable and organised according to the logical criteria set out by the company policies.

Finder Pompe employees who become aware of omissions, forgeries, negligence in bookkeeping or in the documentation on which the book entries are based, are to report these facts to their Manager or to the Personnel Department or to the Supervisory Body pursuant to Legislative Decree 231/2001.

During audits and inspections by the competent public Authorities, an attitude based on maximum helpfulness and cooperation must be adopted towards the auditing and control bodies. In order to prevent conflict of interest situations and grant maximum transparency in carrying out auditing activities, the Company is to identify among its staff specific persons qualified to liaise with the control bodies.

9. Conflict Minerals

Finder Pompe is determined to comply with the requirements related to the prohibition of use of hazardous substances and conflict minerals.

All Finder suppliers should then ensure that all materials supplied are in compliance with the existing regulations and should then establish a policy regarding conflict minerals allowing them to investigate the source of the minerals in question.

10. Conflict of interest

Situations where the parties involved are in conflict of interest – whether related to economical activities linked to the employee or to his/her family - should always be avoided. When our personal interests might interfere with Finder's ones, this is what we define a conflict of interest. If you become aware of a conflict of interest, you should inform the HR manager in order to ask for guidance.

11. Use of Company means and tools

Employees are to guarantee full respect of infrastructures, means, tools and materials belonging to the Company, and timely report any misuse of such equipment by third parties.

Talking about IT systems, each employee is responsible for the security of information systems used. An improper use of the IT resources includes the use of the net for activities that are not related to the company, collection and dissemination of company data for purposes other than the company's ones, sending offensive emails with an obscene language that could be detrimental for the company, visit internet sites with obscene or illegal contents.

12. Confidentiality

Employees are to keep absolutely and strictly confidential any information, concerning the Company and/or its employees, which they may become aware of as a result of their working activity. This in order to avoid the disclosure of confidential information concerning the organisation, production methods and any other information whose disclosure may cause damage to the Company.

Furthermore, employees are strictly obliged to notify to their Manager any request for information concerning the Company and/or its employees that they may receive during the performance of their job and are not to comply with the above mentioned requests prior to a specific authorisation in this regard.

Any information, datum or document the employees become familiar with during the performance of their job, is the exclusive property of Finder Pompe; therefore, by way of example but not limited to, any idea, technical formula, invention, brand, patent, program, business-plan, marketing and sales-plan and similar confidential information are the exclusive property of the Company; it is therefore forbidden to disclose to external parties similar information without the explicit authorisation of one's Manager or to use it for one's own personal benefit.

13. Relations with Suppliers

In relations concerning tenders, provisioning, and in general the supply of goods and/or services, no discrimination should be put in place: Finder will grant fairness, impartiality and equal opportunities to all its suppliers. The process for the selection and approval of every supplier and of each purchase should be always easily reconstructed.

In this respect, employees are requested to:

- Not preclude any supplying company who has the prescribed requirements from the possibility of competing for the granting of a supply contract with the Company, by adopting objective selection criteria, according to stated and transparent methods, contained in the corporate policies.
- Obtain the cooperation of suppliers in constantly ensuring meeting of the requirements of the Company's customers in terms of quality, cost and delivery times.
- Use, in compliance with the laws in force, products and services supplied by the companies of the Group at competitive conditions.
- Comply with and insure compliance with the terms and conditions provided for by the contract.
- Have a clear and open dialogue with suppliers, in line with good commercial practices.
- Inform the Company's Purchasing Management as to any problems that might have arisen with a supplier, in order to assess its consequences.
- Inform one's Manager or the Supervisory Body pursuant to Legislative Decree 231/2001 when one is offered or given donations or gifts by third parties, which are not ascribable to ordinary commercial politeness.

14. Relations with Customers

Employees who have relations with customers are to seek to understand their requirements so as to create a strong business relationship.

Company employees are requested to:

- Comply with the law or with any applicable regulations in their relations with customers, by observing both Italian and Community laws, as well as the local laws of individual Countries in which the company runs its business.
- Not reach agreements with competitors in order to implement price control policies that may damage the free market.
- Supply accurate and comprehensive information about products and services, so that customers may make mindful decisions.
- Keep to the truth in advertising or other kinds of communications.
- Inform one's Manager or the Supervisory Body pursuant to Legislative Decree 231/2001 about any offered or received donations or gifts, which are not ascribable to ordinary commercial politeness.

Furthermore, without prejudice to the regulations governing free competition, all employees are to act in such a way as to attain the best results in competition.

It is against the Company policy to have discussions, communications and information exchanges, agreements, understandings with any competitor in connection with prices, price policies, discounts, promotions, selling conditions, markets and production costs, which may be aimed at restricting or falsifying the free competition market.

15. Relations with Customers

Relations with Public Institutions are exclusively carried out by staff members who are responsible for these purposes. Employees are not allowed to make payments, whether direct or indirect, to public officials and/or to the Civil Service in general, unless these are related to the performance of services or tenders which have been duly authorised by the company managers in charge of the management of said services.

It is forbidden to resort to any behaviour that is in any way aimed at promising or at giving to a Public Official or to the person in charge of a public service money or other benefits in order to get him to do something as part of his office.

In case a Public Official or the person in charge of a public service, by abusing of his/her position and of his/her power, induces a Finder Pompe employee to give or promise money or any other profit, the latter is bound to refrain from giving or promising anything and to report the circumstance to one's Manager or to the HR Department or to the Supervisory Body pursuant to Legislative Decree 231/2001.

With regards to public persons (representatives of Public Institutions, public officials, public employees or foreign governmental officers), we hereby reiterate that gifts, as well as acts of courtesy and hospitality are only allowed if they are of a modest value and in any case such as not to endanger the integrity or the reputation of one of the parties and such as not to be interpreted, by any impartial observer, as aimed at acquiring benefits in an inappropriate manner. In any case, this type of expenses, must be authorised and adequately documented.

In relation with the Civil Service, Employees who, in view of their job within the company, are in charge of requesting, managing and/or administering contributions, grants or funding from the State or from other public Bodies, must, within the limits of their functions, ensure that the above-mentioned income is allocated to the aims for which it was requested and in any case maintain an accurate documentation as to any transaction, so as to ensure maximum transparency and clarity to the related money transfers.

16. Privacy and GDPR

Finder Pompe ensures that all personal data and information that are processed are treated in compliance with the EU Regulation n. 2016/679 (GDPR) and, as applicable, Legislative Decree 196/03 (Privacy Code).

Finder Pompe Srl bases the personal data processing on the principles of correctness, lawfulness, transparency and necessity, thus protecting your rights.

The processing of personal data is exclusively aimed at achieving the following purposes:

- for needs prior to the conclusion of sales contracts, or of any other contract aimed at carrying out the company's business, in order to execute the aforesaid contracts and for purposes strictly connected to them (accounting management, management of purchases and sales, management of receipts and payments and in general administrative and accounting management with regard to the contractual relationship)
- for the proper fulfilment of legal obligations and rights as provided for by law (e.g. for the purposes of accounting, banking, business relations or to assert or defend a claim in court).

More detailed information is available on our website (www.finderpumps.com)

Reporting an Ethical Problem:

Should you face a situation that may have ethical implications, in order to solve possible doubts, please refer to the person your report directly to or to the Human Resources Department or to the Supervisory Body pursuant to Legislative Decree 231/2001. You are also to report to such parties any infringement of the law, of the code of ethics, of the Organization and Management Model pursuant to Legislative Decree 231/2001, or of the corporate policies by any person. You may choose to anonymously report a probable violation by others; any form of retaliation against an employee reporting a situation of an ethical nature is of course forbidden; at the same time, whoever makes untrue statements to the detriment of another employee will be subject to disciplinary measures.