

TYPE OF DOCUMENT:  <b>BUSINESS ETHICS POLICY</b>	CODE MOD00072-CLP	
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## ***BUSINESS ETHICS POLICY***

*The executive of the Clerprem Group considers business ethics as a corporate core value. The executive complies to the following principles in order to ensure fairness in its business activities:*

- *Responsible Sourcing of Materials: Companies are expected to responsibly source raw materials used in their products;*
- *Anti-Corruption: Companies are expected to work against corruption in all its forms, including extortion and bribery;*
- *Privacy: Companies are expected to put in place appropriate measures to respect privacy, to protect personal data against loss and unauthorized access or use, and to comply with relevant privacy and information security laws and regulations;*
- *Financial Responsibility/Accurate Records: All business dealings are expected to be transparently performed and accurately reflected on the company's financial reports and filings;*
- *Disclosure of Information: Companies are expected to disclose financial and non-financial information in accordance with applicable regulations and prevailing industry practices;*
- *Fair Competition/Anti-Trust: Companies are expected to uphold standards of fair business and conduct business in accordance with all applicable anti-trust or anti-competition laws and regulations;*
- *Conflicts of Interest: Companies are expected to conduct business in a manner that avoids any appearance of impropriety;*
- *Counterfeit Parts: Companies are expected to minimize the risk of introducing counterfeit and/or diverted parts and materials into deliverable products;*
- *Intellectual Property: Companies are expected to respect valid intellectual property rights and use commercially reasonable practices to protect the transfer of confidential technology and know-how;*
- *Export Controls and Economic Sanctions: Companies are expected to comply with applicable restrictions on the export or re-export of goods, software, services and technology, as well as with applicable restrictions on trade involving certain countries, regions, companies or entities and individuals;*
- *Responsible Minerals Sourcing: Companies are expected to avoid in its products the use of raw materials which originate from Conflict-Affected and High-Risk Areas and contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects;*
- *Protection of Identity and Non-Retaliation: Companies are expected to establish processes that allow concerns to be raised anonymously with confidentiality and without retaliation;*
- *Companies are expected to support a proactive approach to environmental responsibility by protecting the environment, conserving natural resources and reducing the environmental footprint of their production, products and services throughout their life-cycle, monitoring energy consumption and greenhouse gas emissions, the water quality and consumption, the air quality, the natural resources management and waste reduction, the responsible chemical management.*

*Carrè, July 2021*

*The President  
Gian Roberto Marchesi*