



HEROFLOTM
TECHNICAL FLUORINATED POLYMERS

HEROFLO GROUP'S CODE OF ETHICS AND BEHAVIOUR

People · Passion · Innovation

SUMMARY

1. Introduction

- 1.1. *What is Heroflon Group's code of ethics and behaviour and who is it addressed to*
- 1.2. *Where can it be found*
- 1.3. *Violations*

2. Heroflon Group's values

3. Stakeholders map

4. Application areas

- 4.1. *Respect for all the stakeholders*
- 4.2. *Honesty: relations with customers*
- 4.3. *Passion for quality and customer satisfaction*
- 4.4. *Integrity and loyalty in commercial activities*
- 4.5. *Professional commitment and appreciation of human resources*
- 4.6. *Confidentiality and reliability*

1) Introduction

During all phases of its growth, Heroflon Group has never lost sight of its real ambition: to handle business in the most efficient and productive manner, always in the interest and respect of all involved parties (*stakeholders*).

The philosophy which has always been the basis of the Group's business, is to pursue a constant, balanced and most of all sustainable growth.

Keeping in consideration the increasing attention which is given to *Corporate Social Responsibility* (CSR), Heroflon has enclosed in this Code of Ethics and Behaviour the guide lines and moral values that guide relations, both internally and externally, between the company and all who are involved with it.

This Code of Ethics and Behaviour is not exhaustive, but it is rather substantial. It indicates the basic guide lines to always act respectfully towards the environment and the society.

This code does not mention all the situations that can be encountered while carrying out daily tasks and assignments, but it rather indicates how to evaluate each situation appropriately and with common sense in order to make the right decision.

The industrial development which is pursued by the company cannot transcend the adherence to this code. It is shared with all involved parties, so that any stakeholders who have relations with external parties in Heroflon's name, observe these guidelines.

1.1. What is HEROFLON S.p.A.'s Code of Ethics and Behaviour

This Code summarizes the values and behavioral guidelines which must be followed by administrators, directors, managers, employees, collaborators, suppliers, consultants and other representatives, who act in the name of Heroflon Group.

1.2. Where it can be found

The Code can be found in electronic version in the company's *intranet* and it is also available on www.heroflon.com both in Italian and English.

A paper copy is handed to current and future staff, and it is possible to ask Personell Management for further copies.

1.3. Violations

The lack of observance or violation of existing laws, and the lack of respect of this Code, can have serious consequences on the Company and involved individuals (for example criminal record or damaged reputation).

In case of violations, the Group will put into place disciplinary actions, including termination of working contract and damages.

2) Heroflon Group's values



3) Stakeholders map



4) Application areas

4.1. *Respect for all the stakeholders*

The first and most fundamental requirement for the sustainable growth of a company and for the individual and professional growth of each one is respect for everyone. The Heroflon Group feels like an active part in the community in which it operates, and for this reason feels compelled to take care of the people and locations that are surrounding.

What being respectful means for Heroflon:

- embrace the principles laid down in the Universal Declaration of Human Rights and reject any form of discrimination (ethnicity, gender, religion, age, marital status, sexual orientation and political, social and personal conditions), and refuse any type of child or forced labor;
- reward employee's efforts by offering equal employment opportunities;
- offer a healthy and safe work environment, in accordance with applicable standards;
- observe any laws or local, national or international standards which are applicable in Italy and in any other countries in which the group operates;
- safeguard the environment by constantly monitoring the direct and indirect impacts which are caused by its activity;
- inform all *stakeholders* about the activities which benefit the community, through constant and transparent communication.

4.2. *Honesty: relations with customers*

Contracts and communication with customers are based on honesty and fairness, transparency and impartiality.

Within the Heroflon Group stable and solid relations with customers, both present and future, are created with the help of good listening skills, professionalism, kindness and maximum collaboration.

4.3. *Passion for quality and customer satisfaction*

Heroflon has always given the utmost importance to quality: maintaining high quality

standards and the constant research of customer satisfaction are a few of the main objectives that the company strives for with passion, dedication and constancy. Heroflon invests in training and updating the human resources, as well as investing in information technology, so that offered services are constantly improving.

4.4. Integrity and loyalty in commercial activities

Any relations that Heroflon Group has with customers or suppliers, or any other activity that takes place in the operating market, are governed by loyalty and integrity, honesty and fairness.

Heroflon's commitment to loyalty and integrity includes:

- **strong but loyal** competition, which allows business to develop in equal, fair and ethical manner. For this reason the Group respects the *antitrust* laws and protects the market and consumers. Under no circumstance does the Group act in a manner that is contrary to free competition;
- Avoid in all ways situations that could generate **conflicts of interest**. All employees are expected to act only for the benefit of Heroflon Group;
- Avoid any form of **corruption or unfair advantage**. Under no circumstance is corruption allowed, whether it be to public or private figures, in order to facilitate business. It is also prohibited to offer money or other advantages to obtain benefits;
- Heroflon Group accepts **gifts and freebies** in appropriate and transparent manner. This means that the exchange is within normal business courtesy, that these gifts have contained value and that they do not compromise the fair treatment between *business partners*;
- **Entertainment** is allowed (dinners, shows, short trips, ect.) if done with a business spirit, and both applicant and recipient must be present at the event;
- Heroflon Group does not take part or give any form of contribution to political parties, neither does it take a political stand.

4.5. Professional commitment and appreciation of human resources

Within the Heroflon Group, every employee is involved in reaching the company aim: satisfying customers while giving the utmost respect to the environment, to moral ethic and to all *stakeholders*.

For this reason everyone is invited to put into their work all the skills they have, and

the necessary know-how needed to guarantee a high level of professionalism.

In view of continuous improvement, the Group offers its employees training and professional development, on the basis of the role covered in the company.

Commitment, skills and potentiality are the only criteria evaluated by top management, guaranteeing employees equal opportunities for growth.

The Group also instills in employees the health and safety culture, and the working environment is compliant with current laws. Monitoring, handling and prevention of risks are constantly done.

4.6. Confidentiality and reliability

In handling its activities, Heroflon Group guarantees the total confidentiality of information.

The company's assets such as trademarks, patents or other forms of intellectual property, as well as sensible data or information received from *business partners* for commercial purposes, are protected by adequate internal procedures.

Employees are absolutely prohibited to divulgate reserved and confidential information outside the Group, unless explicit authorisation is given formally.

Contacts

HEROFLON S.p.A.

Via Alcide De Gasperi, 4 - 25060 Collebeato (BS) ITALY

Tel. +39 030 2510211 - Fax +39 030 2511495

www.heroflon.com