
INTRODUCTION

The Lincotek Lincotek
specializing in the heat surface treatment of components used in the following industries: construction
of

2 SCOPE

Principles and provisions of this Code of ethics cater the following Recipients:

- Administrative and control Bodies of the Group companies;
- employees and collaborators of the Group companies with whom contract relations are held, at any title, also occasional and/or merely provisional relations;
- any third party holding paying or free relations of any nature with the Group companies.

Conduct and relations among all Recipients inside and outside the Company shall be inspired by transparency, fairness and mutual respect; within such context, directors and executives first shall be - through their conduct - an example for all human resources by strictly complying with the principles of the Code of Ethics and the company procedures in the performance of their tasks; they shall also disseminate

3.1 Non ethical conduct

The Group is committed to promoting a conduct that avoids conflicts of interest both corporate and personal interest - and firmly establishes that, in no way, the conviction of acting in the interest or to the advantage of the Group may justify the adoption of a conduct contrary to the values stated in this Code, nor to existing laws or regulations.

Therefore, any behavior by anyone both as individual or organization aimed at taking advantage of a strength or dominance position shall be deemed non ethical and as favoring the adoption of adverse attitudes to the Group.

3.2 Dissemination of and compliance with the Code of Ethics values

Lincotek promotes dissemination of the Code of Ethics among all Recipients through training and information activities organized following the different profiles and responsibilities.

Recipients and

excellence are among the fundamental conditions for achieving the goals set and are among the characteristics sought for their employees and collaborators.

Lincotek is committed to developing the attitudes and potential of each employee so that skills and legitimate aspirations are fully realized in achieving corporate objectives.

The Group is committed to providing equal opportunities for all employees on the basis of professional

through their own family members) in the capital of unlisted customers and suppliers, whereby such investments may significantly affect the deliberative processes of the above-mentioned commercial counterparties and in their respective profit sharing;

- they shall respect and safeguard corporate property as well as prevent fraudulent or improper use. The use of goods by employees must be functional and exclusive to the carrying out of the activities and to the purposes authorized by the persons responsible for that;
- they shall keep confidential all information received in carrying out the activities assigned, communicated or disclosed both inside and outside the Group companies, in compliance with current regulations and business procedures;
- they shall not solicit nor accept for themselves or for others: recommendations, preferential treatments, gifts, or other donations from the subjects with whom they relate, in order to prevent the acquisition of benefits of any kind that may be or appear such as to affect the independence of judgment and the impartiality of the beneficiaries. In case employees receive gifts or acts of hospitality that are not of a symbolic nature, they must inform the Supervisory Body of the Group company in order to evaluate the possible return to the offerer or any other appropriate action;
- they shall make decisions based on the principles of a sound and prudent management, by thoroughly evaluating the potential risks and knowing that personal choices contribute to achieving positive results for the Group;
- they shall promptly report to their office manager, or the Supervisory Body, any time they receive instructions conflicting with the law, labor contracts, internal regulations or this Code.

Management is committed to proposing and implementing programs that create value for the Group, therefore maximizing the level of customer satisfaction and safeguarding the long-term interests of both the shareholders and all the employees in accordance with the principles of sound and prudent management.

Lincotek is committed to maintaining favorable working conditions so that each person's skills and knowledge can be further enriched, following a policy based on recognition of merit and equal opportunities by providing specific programs for professional upgrading and the acquisition of additional skills.

Confidential information includes the following, but not limited to: technical information about products, industrial designs, procedures, new applications, sales data, information about extraordinary transactions, purchase programs, and news covered by specific industrial secrets.

5.4 Presents and Free Gifts

6 INTRAGROUP RELATIONS

6.1 Intragroup Cooperation and Operations

In the field of business aimed at loyal corporate cooperation and communication those who - upon the designation of Unitedcotings - assume social responsibilities within the Group, have the duty to attend the meetings to which they are invited, to carry out their given assignments with due diligence and to solicit the identification and exploitation of synergies, cooperating in the interest of common goals.

principles of fairness, effectiveness and protection of relevant interests, paying particular attention to aspects of the application of market conditions.

6.2 Intragroup communication

With regard to the communication activities within the Group, it is specified that the circulation of information must comply with the principles of truthfulness, loyalty, correctness, completeness, clarity in the respect of the autonomy of each company and of specific areas of activity.

7 SUPERVISORY BODY

The control of the compliance and correct interpretation of the rules contained in this Code shall be

In particular the SB:

- promotes the initiatives to disseminate the knowledge of the Code of Ethics and clarify its meaning and enforcement by means of opinions;
- verifies the elaboration of corporate standards and procedures that implement the Code of Ethics;
- promotes the periodic review of the Code of Ethics and its implementation mechanisms;
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- rules; the bodies which have participated in the investigation or in the proposal abstain from voting for such resolutions;
- receives and analyzes reports of violations of the Code of Ethics, and, if necessary, it performs in-depth analyses and audits;
- periodically gives an account of its activity and the issues related to the implementation of the Code of Ethics to the Board of Directors and Board of Auditors;
- verifies the application and compliance with the Code of Ethics through periodic monitoring.

7.1 Communication and dissemination of the Code of Ethics

In order to ensure the widest knowledge and disclosure of this Code of Ethics, a copy thereof must be delivered to each new Director, manager, employee, consultant, auditor at the time of their appointment, recruitment or launch of the collaboration.

