



ACTUATECH
ACTUATOR TECHNOLOGY

ETHICAL CODE

The value of our work

EXECUTIVE SUMMARY

ACTUATECH's PEOPLE



1. DISCRIMINATION

ACTUATECH respects cultural differences and treats every employee with respect and dignity.

2. FORCED LABOUR, CHILD LABOUR AND EMPLOYMENT CONDITIONS

ACTUATECH respects the most advanced legislation on working conditions.

3. RIGHT TO PRIVACY

ACTUATECH respects employees' privacy and complies with the existing national regulations.

4. CONFIDENTIALITY

ACTUATECH trusts its people and expects from them the same respectful attitude.

5. POLITICS

ACTUATECH is not interested in supporting political parties or any political-related entity.

6. CONFLICT OF INTEREST

ACTUATECH asks its employees to report any possible conflict of interest.

7. MEDIA, COMMUNICATION AND INTELLECTUAL PROPERTY

ACTUATECH respects the right to information and regulates the related operations and initiatives.

8. USE OF ELECTRONIC TOOLS AND OTHER COMPANY'S DEVICES

ACTUATECH people use electronic tools provided by the company.

ACTUATECH's PARTNERS

1. CORRUPTION AND OTHER FORMS OF ILLEGAL PRACTICES

Corruption is not accepted in ACTUATECH.

2. GIFTS AND ENTERTAINMENT

Gifts and entertainment in business relationships are a common practice. However, it is important to normalize such procedures.

3. PHILANTHROPY

Philanthropic donations are a form of pro-bono investment that ACTUATECH may spontaneously enforce to serve the needs of relevant stakeholders.

4. MARKET COMPETITION AND INFORMATION

ACTUATECH respects markets' free competition and avoids to sign any form of agreement that could interfere with free market conditions.

5. PRODUCTS' FEATURES AND DECLARATIONS

ACTUATECH wants its products and production processes as qualitatively performing as safe, for both buyers and producers.



ACTUATECH's COMMUNITY



1. SENSE OF BELONGING

We consider ourselves as one actor within a network of many.

2. NETWORKING AND DISSEMINATION

Considering other actors (employees and clients) implies a relevant effort of dissemination within our community.

3. ENVIRONMENTAL SENSITIVITY

ACTUATECH is aware of the importance of acting responsibly to prevent environmental hazards and to reduce pollution.

4. INTER-GENERATIONAL RESPONSIBILITY

ACTUATECH loves what it does.

PERSPECTIVES

**INTERNATIONAL
REACH**

**FLEXIBLE
ATTITUDE**

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ACTUATECH 2017

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Ethics in ACTUATECH is a manifesto in which our company truly believes.

This bold statement is the right way for us to start this journey inside ethical values applied to ACTUATECH core business.

To do so, we decided to organize contents and information around three pillars:

- **ACTUATECH'S PEOPLE**
- **ACTUATECH'S PARTNERS**
- **ACTUATECH'S COMMUNITY**

The first pillar has to do with behaviours impacting on our employees conduct, as well as behaviours enabled by them, which are related to company's values and ethical issues.

The second pillar refers to how ACTUATECH respects its values while doing its job, namely partnering with clients to respond to their needs providing reliable products.

Finally, the third pillar is related to ACTUATECH's community, meaning the tangible and intangible,

social and environmental stakeholders whose voices ACTUATECH wants to hear and understand. Hence, this document refers to our shareholders and stakeholders, with whom the company wants to establish a mutually enriching relationship aiming at improving our current performances.

Overall, this publication represents the state-of-the art of ethics in every day's activities at ACTUATECH.

Crucially, this is for us just the first step, as we believe that Ethics cannot be executed according to a top-down approach, or just by listing general and immutable principles. We have started a long journey that has to be inclusive, shared and participative. To do so we looked back at our mission & vision's values, in other words our company's DNA, from which everything stated here is derived. Indeed, as we truly believe that the identity of a company trickles down in every single action, we exemplified here how we do implement our signature's values in our daily business, every day.

Clearly, there are questions and topics that cannot be sufficiently explained in this document. Things might be still in progress or just at an early stage. Consequently, we cautionary chose to mention here what we are ready to affirm. The rest are goals to be achieved in the near future and they will be presented in perspective, at the end of this document, to give our efforts a clear direction.

If what said so far has already piqued your curiosity about the extent to which this document can really be respected and enforced, please, read below:

IS THIS JUST AN INTERNAL DOCUMENT?

No. The usability of this document is extended. It is available for ACTUATECH people, clients and stakeholders as we consider it a guide for mainstreaming ethics in our activities whomever we are dealing with.

WHO SHOULD COMPLY WITH THE STATEMENTS HERE CONTAINED?

We target ACTUATECH staff, ACTUATECH partners and ACTUATECH community. In other words, everyone has to do with us (i.e: managers, employees, consultants, trainees, students, intermediaries, agents, etc.) must be aware of the contents of this publication. On top of that, ACTUATECH managers are responsible for their related employees to make them aware of the contents of this publication, which will be accessible in many forms: online and offline. Managers' role is, therefore, crucial to instil the right attitude to all employees, namely a type of professional fairness that cannot be dictated as it directly results from a series of exemplary behaviours followed every day, in every circumstance. Of course, we cannot be responsible for our vendors, distributors, clients, consultants, competitors or fellows' behaviours all along their production chain, but by observing these rules during ACTUATECH daily operations we aim at catalysing more broadly a new way of doing business: well and good.

WHAT HAPPENS IF SOMEONE VIOLATES THE ETHICAL STATEMENTS HERE CONTAINED?

None of the principles here contained is mandatory as only a legal requirement can be. However, violating these statements will discredit ACTUATECH reputation and will be seriously taken into consideration by the top-management at ACTUATECH. It is firmly understood that everyone at ACTUATECH (and on behalf of ACTUATECH) is responsible to maintain and increase our company's reputation.

WHAT TYPE OF REPORTING MECHANISM IS ENFORCED?

If someone gets to know about a violation that may harm ACTUATECH reputation, violating one or more of the principles here declared, it is mandatory to report it to his/her responsible manager, or to the top-management.

HOW DOES THIS PUBLICATION RELATE TO ACTUATECH NATIONAL LEGISLATION?

All ACTUATECH internal behaviours and external operations do comply with the Italian legislation and with that of our operating countries. There where our ethical values go beyond the legal requirements, in a positive way, such statements must be observed.

TO WHICH SITE DOES THIS DOCUMENT APPLY?

This document applies to all ACTUATECH industrial sites.



HOW DO WE BEHAVE?

ACTUATECH requires to its people to act with integrity and responsibility, being respectful of each other's opinion and beliefs. Conversely, ACTUATECH do respects employees freedom to express their ideas and positions as just by sharing different thoughts we can truly work in an enriching environment where professionals can increase their competence. Building on that, it is also true that supporting such a stimulating environment is the only way for us to be "a local company with a global mind", something that is conducive to ACTUATECH way of operating in the market: practical, efficient and up-to-date.

We, then, defend and stimulate ACTUATECH people to:

- Act with correctness and fairness with all counterparts, being always sure that people can say that ACTUATECH behaviour was exemplary.
- Stimulate innovative thinking and participative methods to exchange views and solve debates, as new forms of shaping concepts and relationships can help addressing problems and rigidities more effectively and rapidly.

WHERE DO WE WORK?

Working in a safe environment is key to be a good professional and to work with passion. Everything relates to where ACTUATECH operations take place, both physically and psychologically, have to enable ACTUATECH people best expressing themselves with no risks for their safety, their health or psychological balance.

Hence, what we ask ACTUATECH people to do is:

- To stay informed with regard to the safety of the workplace,
- To follow rigorously the instructions given to each employee,
- Not to expose themselves to unnecessary risks during working hours,
- Be aware that employees are also responsible for facilitating the work of everyone' else at ACTUATECH, as productivity and great performances derive from an excellent teamwork.

Additionally to that, managers do also have to:

- Verify that employees have received a specific training on safety and health issues on the workplace according to the D.Lgs. n° 81/2008 and 106/2009,
- Be sure that the training received is updated and properly done,
- Address and solve in a fair and open way every misunderstanding and/or problem that might rise amongst employees on specific aspects related (or not) to ACTUATECH business, which could negatively affect it.
- Share with other managers ideas and solutions for facilitating the collaboration amongst different units that are not yet sharing a common view on relevant issues.



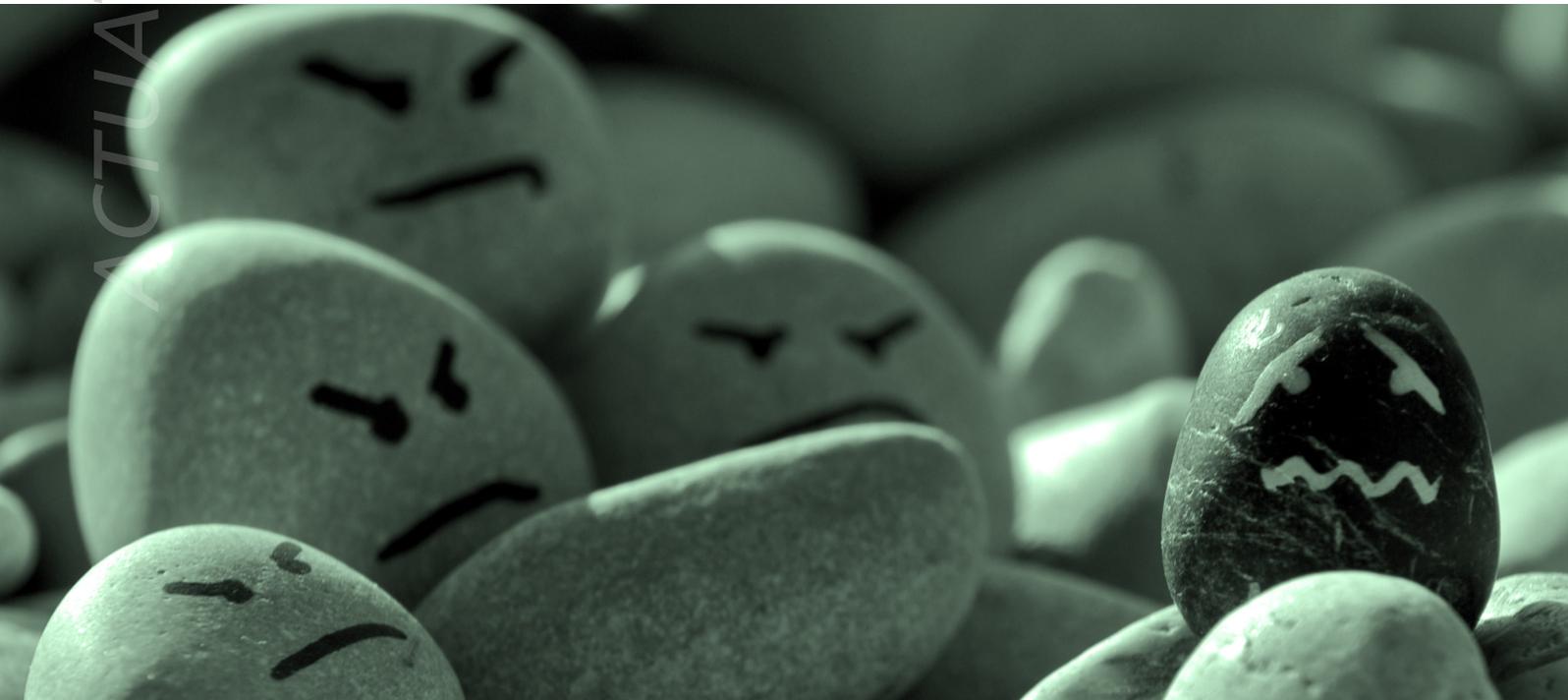
DISCRIMINATION
1

ACTUATECH respects cultural differences and treats every employee with respect and dignity. Racial, gender or religious attitudes, cultural beliefs, nationality, political opinion, physical conditions or socio-economic origins are seen as enriching variables and must not be used to discriminate anyone. With this in mind ACTUATECH people are asked to:

- Do not encouraging nor taking part in bullying, mobbing, stalking or humiliating acts, both verbally or physically
- Do not creating conditions that may reduce colleagues' self-esteem or professional reputation
- Intervene and contact your manager, or the top-management, should you assist to or noticing discriminating acts against ACTUATECH people

Additionally to that, managers do also have to:

- Ensure that employees are treated with due respect and judged exclusively based on their professional performances



DIRITTO ALLA PRIVACY
2

ACTUATECH respects employees' privacy and complies with the existing national regulations that protect personal data, online privacy and sensitive information that might accidentally circulate on the workplace. More precisely, ACTUATECH recognises and enforces a specific privacy code focused on privacy issues, as complying with article 13 D.lgs. n°196/2003. Such code is available to (and signed by) every ACTUATECH employee.

In so doing, ACTUATECH encourages its employees:

- to secure passwords, web accounts, electronic devices that may reveal personal information
- to collect personal information just for work-related issues and to make them always accessible to the legitimate owner
- not to inquire about personal or health conditions unless it is needed for safety and work performance reasons, or for complying with the national legislation
- not to inquire about people's personal life (e.g political orientation, pregnancy, sexual orientation, religious sensitivity, etc.).

FORCED LABOUR, CHILD LABOUR
AND EMPLOYMENT CONDITIONS

3

Forced labour and child labour are not tolerated at ACTUATECH. We also respects the current legislation on minimum working age. Finally, ACTUATECH respects employees' right to organize and to collective bargaining.

Building on that, ACTUATECH managers are asked to:

- be sure that each and every ACTUATECH employee has signed a written employment contract, or any other document from which it is clear and evident that the employee is working voluntarily for ACTUATECH
- be sure that all new employees respect ACTUATECH ethical values here declared
- be sure that the salary, including payment for overtime, is in accordance with ACTUATECH national law, collective agreements and in line with the salary and the legal framework corresponding to the candidate's competences
- not to use salary deduction as a form of disciplinary measure
- be sure that employees are free to meet and discuss work-related issues, including with unions
- be sure not to employ someone aged below the minimum agreed in the collective agreement
- be sure that recruiting processes must be transparent and exclusively based on professional competences, including when the candidate is somehow related to an ACTUATECH employee. In the latter case, the candidate must clearly communicate about his/her relationships with an internal employee and the latter must not be involved in the recruiting process.



CONFIDENTIALITY

4

ACTUATECH trusts its people and expects from them the same respectful attitude. Confidential information cannot be released to unauthorized people without prior consent. A confidential information is a content that shall not circulate outside ACTUATECH staff or, more generally, reaching third parties. This because such information are critical for ACTUATECH business, image, strategies, technologies, employees and business partners. ACTUATECH people, therefore, are asked to:

- do not disseminating sensitive and confidential information for personal purposes,
- do not circulating sensitive and confidential information outside ACTUATECH,
- be sure that sensitive and confidential information are secured (both on electronic devices or other forms of material or digital archives).

POLITICS

5

ACTUATECH is not interested in supporting political parties or any politicalrelated entity. Yet, ACTUATECH management can approve membership of industrial organizations or networks which operate in fields that are aligned with ACTUATECH mission and vision. ACTUATECH people are requested to:

- not to use ACTUATECH name or logo to support political organization whatsoever,
- not to share personal political opinions using ACTUATECH email address or official letterhead,
- not to use ACTUATECH name or logo for personal participation in political activities,
- not to advocate nor campaigning for any political party within ACTUATECH sites and compound.

CONFLICT OF INTEREST

6

ACTUATECH asks its employees to report any possible conflict of interest. The latter refers to situations in which personal interests may be prioritized over ACTUATECH interests. ACTUATECH people are asked to:

- Report to your manager about doubts of being in a situation of conflict of interest,
- Never take advantage of ACTUATECH name for personal purposes,
- Not to work for ACTUATECH direct or indirect competitors.

Besides that, ACTUATECH managers have to:

- Be sure that no individual employee can process a financial transaction on behalf of ACTUATECH without involving other colleagues, at least informing them, in the operation,
- Verify every initiative reported by employees and leave a written assessment on it.



WITH WHOM ARE WE WORKING?

In our company we respect national and international law related to products, production processes and business practices.

As a company working at a worldwide level we have to clarify what is acceptable for us, in other words to which behaviour is possible to associate our brand during business operations.

Clearly, we recognise that the economic (and financial) market is a complex scenario where different actors follow different profit-driven priorities, according to different logics. Nonetheless, none of such logics can ever infringe the following principles when it comes to ACTUATECH credibility and reputation as a market player.

The following aspects refer to the relationships between ACTUATECH and its business partners. The latter include clients, distributors, suppliers, agents, consultants or anyone acting on behalf of ACTUATECH.



1 CORRUPTION AND OTHER FORMS OF ILLEGAL PRACTICES

Corruption is not accepted at ACTUATECH. We do not admit this practice nor we encourage to adopt similar behaviours of any sort. Bribery, money laundering, facilitation payments, extortion and tax offence are all banned from our working routine.

Consequently, ACTUATECH partners do have to:

- Avoid any form of corruption, bribery, money laundering, facilitation payments, extortion and tax offence,
- Verify that third parties acting on behalf of ACTUATECH will never corrupt or be corrupted, nor be (or have been) involved in bribery, money laundering, facilitation payments, extortion and tax offence,
- Refuse to accept payments that are not related to a specific service that is expected from a given business partner and related to a specific ACTUATECH business request,
- Be sure that every type of business relationship corresponds to a written contract,
- Report to an ACTUATECH manager should you suspect to be addressed by an attempt of corruption to yours or ACTUATECH reputation detriment.

2 GIFTS AND ENTERTAINMENT

Gifts and entertainment in business relationships are a common practice, especially relevant in some cultures where they become a sign of spontaneous gratitude and cultural acceptance. However, given the respect due to such proactive intentions, it is important to normalize such procedures according to ethical variables that must inform the receiving or sending of presents to (or on behalf of) ACTUATECH, as well as the experiencing of entertaining

activities related to ACTUATECH business.

With this in mind, ACTUATECH employees have to:

- Strictly avoid receiving money or loans as forms of presents from clients, partners, distributors or whomever,
- Consider what stated above for ACTUATECH employees' families too,
- Accept gifts or presents from private or public partners only if this will not lead to a potentially dangerous or ambiguous situation for ACTUATECH reputation,
- Devolve any gift or present received from private or public partners to the internal Christmas lottery, which will sort them out amongst all ACTUATECH employees
- Respect a congruence between the entertainment activities organized on behalf of ACTUATECH (or experienced while working for ACTUATECH) and the professional ethics, which avoids to expose employees and/or partners to embarrassing or ambiguous situations.

PHILANTHROPY

3

Philanthropic donations are a form of pro-bono investment that ACTUATECH may spontaneously enforce to serve the needs of relevant stakeholders. However, under no circumstances such donations should be confused with means to obtain an unfair advantage or any other form of illegal incentive related to business returns.

Considering that, ACTUATECH employees are asked to:

- Prioritize non-monetary donations, like time or knowledge transfers in favour of needy associations,
- Avoid to support public institutions of any sort with monetary donations,
- Verify the reputation of the receiving entity, avoiding to be associated to suspicious beneficiaries,
- Keep track of every financial disbursement in a written form, signed by the receiving entity, in which it is clear the need and the agreement behind the related financial support, being the latter exclusively linked to charity goals.



MARKET COMPETITION AND INFORMATION

4

ACTUATECH respects markets' free competition and avoids to sign any form of agreement that could interfere with free market conditions, such as partnerships to create dominant positions hindering a free and fair concurrence amongst market players.

Seemingly, any information gathered to collect data about competitors will be obtained in legal manners, without directly involving the competitors, and with the sole purpose of comparing products' performances and business strategies.



ACTUATECH wants its products and production processes as qualitatively performing as safe, for both buyers and producers. This is why ACTUATECH envisions its daily job as a promise of environmentally-sound performances and safety measures fully implemented. With this in mind, hence, we do our best to comply with the most advanced certifications and standards, well aware that this is an ongoing process towards an improved and trustworthy

brand's reputation.

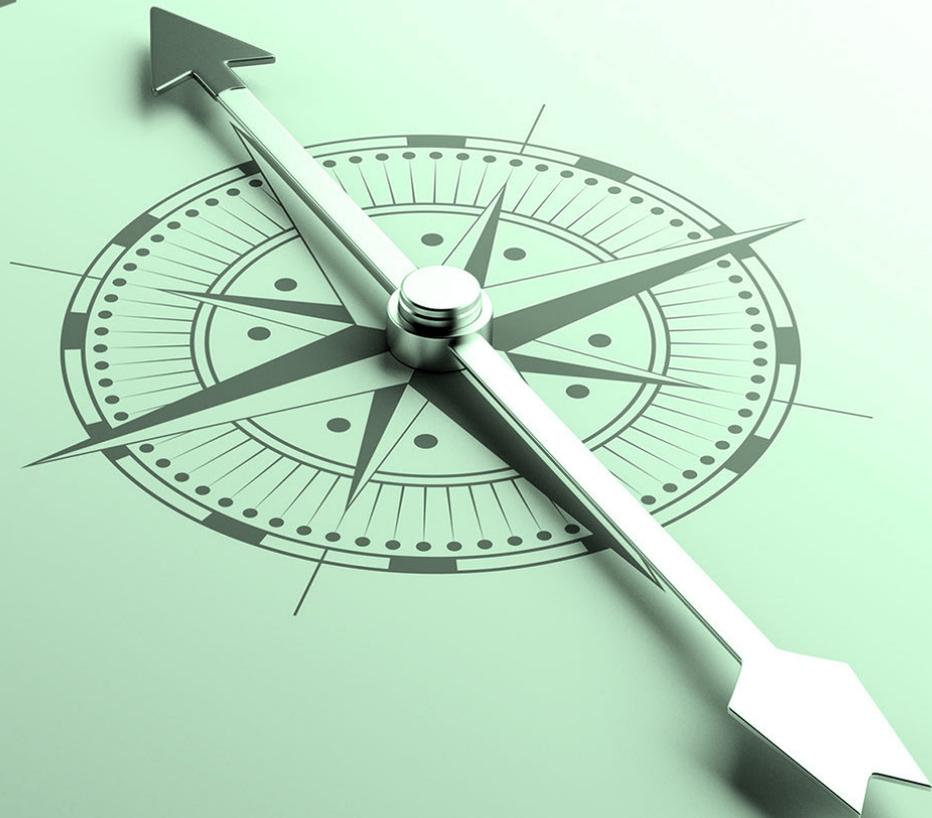
From the point of view of management processes, we decided to adopt and implement an environmental management scheme according to ISO 14001 standards. In this case we demonstrate our commitment by clearly enforcing a mechanism whereby every internal and external responsibility linked to environmental issues is tracked and properly applied. In addition to that, we also enforced a qualitative management scheme, according to ISO 9001 standards, that helps us continuously improve the quality of our processes and products.

Lastly, from the point of view of products' features, we additionally guarantee their safety with regard to buyers and workers by submitting every imported material to a control enforced by an Italian public officer to verify the complete absence of radioactive elements or radiation traces that may end up in ACTUATECH manufactured goods.

With this in mind, all ACTUATECH employees are required to:

- Prioritize qualitatively superior solutions in daily operations regarding products or production processes,
- Clearly communicate the obtainment of labels or certifications and/or the advancement in the obtainment of them, including auditing and thirdparty verification processes,
- Be aware that every information related to certifications, quality standards and performance criteria disclosed by ACTUATECH must be true, verifiable and reliable,
- Contact your direct manager in case of any suspect related to products or production processes that might result in being dangerous for people, for the environment and for the existing working infrastructures.

QUALITY-





We want to live in a society able to share knowledge and good practices amongst different actors all concurring to do their job in the most ethically-oriented way. This is why we are more than happy to communicate transparently our behaviours, hoping that they could demonstrate that coupling good and fair business is not a hype.

SENSE OF BELONGING

1

We consider ourselves as one actor within a network of many. Indeed, respecting ethical values isolated and for the sake of it, is no real thing. Nowadays it is more and more important to recognize ethical behaviours as enablers of "shared practices of value", namely virtuous approaches commonly implemented by a system of different actors all belonging to the same community. In ACTUATECH case, we consider our choices systemically, namely in close connection with those of all levels' public institutions, other companies, NGOs and local organizations...in one word "ACTUATECH community". This is the only way to be sure that ACTUATECH ethical values can have sounds impacts at a broader level. Considering that, ACTUATECH employees are asked to:

- Always engage the relevant stakeholders while discussing activities that may have an impact on the community where ACTUATECH works
- Keep track of needs and expectations of local stakeholders, reporting to them in case of decisions that may change the positioning of ACTUATECH with regard to social or environmental issues at a local level
- Maintain an open and transparent attitude towards any local actor, highlighting the importance of belonging to a network of good doers.

ACTUATECH'S COMMUNITY





2 NETWORKING AND DISSEMINATION

Considering other actors (beyond ACTUATECH employees and clients) implies a relevant effort of dissemination within our community. For this reason ACTUATECH communication initiatives are strategic tools for multiplying the positive impacts of our practices while sharing them with other players that could further replicate them. Also, sharing our way of acting as a company allows us to innovate our approaches as a result of getting in touch with new people, insightful networks and a deeper understanding of our community's needs.

We believe that openness in sharing information related to ACTUATECH is crucial to make ACTUATECH values clear to everyone. This includes both positive and negative records, complete and incomplete performances. We support the idea that even uninspiring initiatives can be starting points to improve our path to become more ethical, day by day. It is all about openly report our goals and our related initiatives.

Considering that, ACTUATECH employees are asked to:

- Communicate openly and respectfully whomever you are talking with
- Communicate ACTUATECH way of respecting ethical behaviours to ACTUATECH community stakeholders
- Do not release official statements on behalf of ACTUATECH if these are not internally approved

On top of these, managers have also to:

- Ensure an open, constructive and effective practice of solving internal problems dialoguing with employees and colleagues,
- Share doubts and criticalities with informed parties and authorities from ACTUATECH community, in order to be updated and sure about the feasibility of given operations,
- Make every document accessible to ACTUATECH people, who might need them for consultation, as well as to local authorities' inquiries.



ACTUATECH is aware of the importance of acting responsibly to prevent environmental hazards and to reduce pollution deriving from our business operations. We consider the impacts of our activity in light of the many stakeholders we report to. Among these, we include the environment, namely the nature, the ecosystems, biodiversity, biological communities, in one word all the living organism on earth.

Stating that, ACTUATECH employees have to:

- Be aware of the environmental impacts of the daily operations at ACTUATECH,
- Be sure to know how to behave to minimize environmental impacts in our daily operations, following rigorously the internal procedures to reduce environmental impacts deriving from pollution, waste, procurement, transports, out of office meetings and other business-related externalities,
- Report to managers in case of unexpected activities whose impacts may endanger the environment,
- Update personal knowledge about internal and external procedures for reducing environmental risks in daily business operations

On top of that, managers have to:

- Be aware of your role of guide in terms of virtuous environmental behaviours, which means also to train employees on how to respect standards and internal procedures conceived to reduce the environmental impacts of ACTUATECH operations,
- Be sure that employees have received the required training for minimizing their environmental impacts during their work at ACTUATECH,
- Consider the environment as one of the variables for choosing suppliers and business partners.



ACTUATECH loves what it does. This means not only that we take care of every small component of our products but also that we produce our valves and actuators considering the responsibility that we have relatively to the future generations. This approach informs every action at ACTUATECH as we believe that to be a responsible company means to be an example for future entrepreneurs, employees, managers and people that will have to

deal with the same environment and community we are currently living and interacting with. Obviously, such sense of duty and responsibility increases the burden that ACTUATECH experiences in terms of respecting virtuous standards and best practices with regard to ethical behaviours related to our activities. For instance, ACTUATECH products comply with “Dual Use certifications” as we avoid to sell our metallic products where it is forbidden due to risks of misusing them for military purposes. Additionally, ACTUATECH guarantees that their products are produced with materials that are not sourced in conflict areas, as certified by the “Non conflict declaration”. These are just two examples of how we aspire to be a key economic player enjoying growing business opportunities while being committed to updating internal processes, behaviours and approaches with which we operate, daily.

With this in mind, ACTUATECH employees are asked to:

- Feel the responsibility of representing a model of behaving for companies willing to follow a virtuous path towards social and environmental sustainability,
- Be able to respond to different ethical priorities always choosing for the fairest and cleanest option, the one that our children would be proud of us choosing it,
- Understand that ACTUATECH activity is projected in the future and this means not only that our operations must be financially durable but also socially and environmentally sustainable preserving future generations’ needs and potentialities.

PERSPECTIVES

This is an evolving document as its ethics-related contents changes according to different corporate's needs, regulations and visions. This means that although values here contained are fundamental to ACTUATECH activities, and non-negotiable, they may be enriched by other principles resulting from future's interactions and feedback from our internal or external shareholders and stakeholders.

We know where we want to go: towards representing a model of good business by being a company truly committed to excelling in producing outstanding valves and actuators AND much beyond.

For this reason, we have added this last section to present just some of the open-issues related to two principles currently under discussion amongst ACTUATECH people:

- **INTERNATIONAL REACH**
- **FLEXIBLE ATTITUDE**

The two values above refer to become a company able to open a dialogue at an international level with other companies and institutions on issues related to corporate's ethics (i) and to maintain a flexible approach to deal with new forms of high-skilled professionals (and professions) that demand agile and smart solutions for being attracted by the manufacturing sector (ii).

Fully aware that "it is a long way to the top", we consider this document and its contents the first step of our long and exciting journey.





ACTUATECH
ACTUATOR TECHNOLOGY

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