THE CODE OF CONDUCT ADDENDUM

DATWYLER SEALING SOLUTION ITALY S.p.A.

Approved on February 2019

DATWYLER

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1. RECITALS

This document (the "**Addendum**") has been adopted by Datwyler Pharma Packaging Italy S.r.l. ("**Datwyler**" or the "**Company**"), in addition to the provisions set out in the Group Code of Conduct, to foster a working environment geared towards compliance with the law, fairness and collaboration, allowing the involvement and responsibility of all Datwyler employees and collaborators in performing their activities.

In this regard, Datwyler bases its in-house and external activities on compliance with the principles set out in the Group Code of Conduct and in this Addendum, which, inter alia, represent a key part of the organizational, management and control model adopted, pursuant to Legislative Decree no. 231 dated June 8th, 2001 ("**Legislative Decree no. 231/2001**" or the "**Decree**") by Datwyler (the "**Model**").

In this perspective, principles and values herein included extend and complete the scope of the Model by defining, in relation to sensitive business processes, the conduct to be taken to prevent illegal practices not specifically regulated by the same Model, as deemed marginal with respect to the risks of crimes being committed that may involve Datwyler in the performance of its business activities.

In view of the above, any conduct that, in breach of the provisions set out in this Addendum, may result in a criminal offence envisaged by Legislative Decree no. 231/2001 and subsequent amendments, or by other legal provisions, is to be considered as forbidden and subject to the penalties specifically referred to in the General Part of the Model.

2. MISSION

Datwyler, with registered office in Pregnana Milanese (MI), develops, manufactures and wholesales pharmaceutical packaging and components for medical instruments and equipment, related materials as well as plant, machinery and equipment for industrial use and complete production lines for the above products.

In pursuing its mission, the Company undertakes to comply with the provisions of its Bylaws and any applicable legal provisions.

3. SCOPE AND ADDRESSEES

The provisions of this Addendum apply to all company activities and represent the key principles underlying Datwyler activities while also defining the general requirements of diligence, fairness and loyalty, governing working performance and workplace conduct.

The principles and provisions of the Addendum are binding for the Board of Directors, the Statutory Auditors, for employees and for all those who engage in collaboration with the Company without being subject to employment restrictions, consultancy, agency, commercial representation and other relationships resulting in a professional service, whether ongoing or occasional (including those who serve on behalf of suppliers and partners, including in the form of temporary associations of companies, as well as joint ventures) ("Addressees").

4. GENERAL PRINCIPLES OF CONDUCT

Datwyler undertakes the following general principles of conduct which must be complied with and endorsed by all those who administer, control, work and collaborate with the Company.

Liability - Compliance with the law

The Company considers compliance with the applicable law, regulations and procedures, as a mandatory requirement for daily activities.

In this regard, each Addressee is required to be aware of the statutory implications relating to his/her duties and is also required to carry out his/her work in accordance with company procedures and with professionalism, diligence, efficiency, collaboration and fairness, making the best use of the available tools and time and assuming the responsibilities associated with the commitments undertaken.

Fairness and Correctness

Fairness is one of the fundamental principles for all of Datwyler's activities and is essential to its management.

All actions and activities carried out and behaviours adopted by each of the Addressees in the performance of their duties or functions must be inspired by the principles of correctness, transparency, traceability, documentability, segregation of functions, in compliance with current regulations and internal procedures, also in order to protect Datwyler's assets and reputation.

5. CONDUCT POLICIES IN IN-HOUSE RELATIONSHIPS

Relationships with employees and/or collaborators

In the management of human resources, Datwyler guarantees compliance with the following principles:

- offer equal employment opportunities without any discrimination on the basis of ethnic origin, race, gender, age, sexual orientation, physical or mental disabilities, physical and/or social conditions, nationality, religion, opinion, political and/or trade union membership;
- ensure fair and merit-based treatment for each employee and/or collaborator;
- spread and consolidate a culture of safety in the workplace in order to protect the health and safety of employees and/or collaborators, both from a physical and psychological point of view;
- ensure the protection of the confidentiality of employees and/or collaborators and their right to work without being subject to unlawful influences.

Therefore, Datwyler is required to:

- for the decisions relating to the growth of employees and/or collaborators, apply merit-based, skill-based and, in any case, purely professional criteria;
- select, hire, train, pay and manage employees and/or collaborators, without any discrimination.

In addition, the conduct of all the Addressees must be based on compliance with the prevention from engaging in conduct that gives rise to:

- taking advantage of a situation of physical or mental inferiority or of a situation of need or by promising or giving money or other advantages to those who have authority over the person;
- harassment, including sexual assaults;
- creation of an intimidating, hostile, isolating or otherwise discriminatory working environment towards individuals or groups of workers;
- situations of competitiveness that hinder individual growth and fairness in the collaborative relationship.

Anti-money laundering

Datwyler shall not in any way be involved in money laundering activities of any kind.

Datwyler also undertakes to comply with all national and international anti-money laundering regulations and standards.

The Addressees are required to carry out the appropriate controls in order to verify, as far as possible, the moral integrity and reputation of the counterparty before entering into relations or contracts of any kind or nature.

Accounting and management information notice

Datwyler will adequately record all transactions and operations carried out in order to make it possible to verify the process of decision and authorization of the same.

Each transaction must be supported by suitable documents in order to carry out checks on its characteristics and grounds and to identify who authorised, carried out, recorded and verified such transaction. For this purpose, the information relevant to Datwyler's accounting, whether general or analytical, shall be based on the principles of clarity, transparency, fairness, completeness and adequacy.

6. CONDUCT POLICIES IN EXTERNAL DEALINGS

Customer relationships

Datwyler is committed to fostering the utmost customer satisfaction by providing comprehensive, truthful and accurate information about the services provided, so that the customer can take an informed decision.

The Addressees are therefore required to comply with the internal procedures adopted by Datwyler for the management of relationships with customers, in order to meet their requirements and interests..

Suppliers Dealings

Addressees, when selecting suppliers of goods and/or services, must comply with the principles contained in this Addendum and must also comply with the provisions contained in the specific procedures adopted by Datwyler, in order to guarantee the utmost ethical standards in the procurement process of goods and/or services.

In this regard, Addressees must select potential new suppliers, verifying their moral integrity, good reputation and standing and must base their choice on objective parameters, such as the quality and price of the goods or services to be purchased, as well as guarantees of assistance, timeliness, efficiency and availability of resources.

The Addressees, in their commercial relationships with suppliers, are required to comply with company procedures and anti-money laundering regulations, avoiding suspicious transactions from the point of view of fairness and transparency and/or potentially suitable for encouraging the receipt of stolen goods or the money laundering from illegal or criminal activities.

Dealing with third parties, institutions, supervisory and public authorities

In its dealings with third parties, institutions, supervisory and public authorities, Datwyler is committed to the principles of fairness, loyalty, truthfulness of statements, transparency and cooperation.

Each Addressee is, therefore, required to reject any pressure from public or private subjects aimed at obtaining money, goods or other benefits in exchange for an advantage to be rendered in favour of the Company, just as he or she is prohibited from promising and/or making promises and/or unduly offering money or other benefits to public or private subjects in order to obtain an undue advantage for the Company.

The Addressee who receives an offer or a request for benefits from a third party, except for commercial or modest freebies, must immediately inform Datwyler.
Furthermore, the Addressees are required to cooperate as much as possible with the supervisory and control authorities and with any public authorities that may request it with regard to their relationship with

the Company and, more generally, not to improperly tamper with the correct performance of any inspection and/or investigation activity.

This general principle of conduct must apply, especially when the Addressees are called upon to render before the judicial authority (and, therefore, both in the investigation and in the trial phase) statements that can be used in criminal proceedings, when the Addressees can choose not to answer.

Collections and payments

Datwyler carries out its activities in accordance with the anti-money laundering regulations in force, as well as the provisions issued by the relevant authorities.
In this regard, Addressees are expressly forbidden to make or accept cash payments to/from third parties that the Company has commercial dealings with beyond the thresholds provided for by current legislation. Payments or collections in excess of these amounts must be made in accordance with the specific company procedures, exclusively through the use of banking channels that ensure the traceability and transparency of the same.

7. DISSEMINATION OF THIS ADDENDUM AND PENALTIES

For the purpose of the correct implementation of this document, Datwyler considers it essential to promptly disseminate the contents of this document, including through the provision of specific and diversified communication activities according to the parties involved, as well as ongoing monitoring of compliance with the same.

In this respect, the Company shall inform all Addressees of the provisions and application of the Addendum, recommending its compliance. In particolar, Datwyler provides for:

- disseminating the Addendum to the Addressees, through the distribution of paper copies of the same;
- understand and explain, where necessary, the provisions contained in the Addendum;
- verify effective compliance with the Addendum;
- update and implement the Addendum, according to the needs arising from time to time.

The Addressees are therefore required to actively participate in the training meetings organised by the Company and to promptly report any alleged infringement of this Addendum.
Datwyler is committed to protecting those who make such reports in good faith and honestly from retaliation or adverse effects on their professional position.

This Addendum can be found on the Datwyler corporate intranet, accessible to all employees and/or collaborators of the Company, as well as on the Company's website.

Penalty System

Datwyler considers compliance with this document to be an integral part of the obligations arising from the relationship that the Addressees have entered into with the Company. Therefore, the breach of the provisions contained in this Addendum and/or in the company procedures or in the provisions of laws referred to therein entails, for the Recipients responsible for such breaches, the application of the penalty provisions contained in the General Part of the Model herein expressly referred to.

8. FINAL PROVISIONS

This Addendum has been approved by the Board of Directors of Datwyler. Any future updates, due to regulatory adjustments or to the evolution/modification of the Company's activities, will be approved by the Board of Directors of Datwyler and promptly disseminated to all Addressees.

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