

Supplier Code of Business Conduct and Ethics





Supplier Code of Business Conduct and Ethics

Ever since 1952, Finder Pompe has run its business with a strong commitment to comply with legal regulations and ethical behaviours. We have identified the qualities through which we wish to be acknowledged by the market and, with the formalisation of our corporate culture and of our values, we can convey information outside the company about the care that everyone in Finder Pompe devotes to ethics, to integrity, to uprightness and to the company's reputation.

We want to do business with Professionals and Companies who share our values and our ethical business practice and, therefore, we have decided to issue a Supplier Code of Business Conduct and Ethics to accompany our Suppliers, as well as permitted Sub-Contractors, in this cultural journey.

The values in it reflect those foreseen by the Code of Business Conduct and Ethics that is followed by all Finder employees and managers.

We expect all our Supplier to conduct their business ethically, with high standards of integrity and sustainability. Evaluation of our Suppliers will not be limited to the supplied products and service, but will also consider the compliance to these ethical and integrity standards. Suppliers who do not conform to these standards may be disqualified and business relationship with Finder Pompe might be terminated.

The code of ethics is an integral part of the form pursuant to the Legislative Decree 231/01.

Kind regards,

The Management of Finder Pompe – Division of Gruppo Aturia S.p.A.



TABLE OF CONTENTS

1. Accessing the Code of Ethics	Page 3
2. Purpose	Page 3
3. Human Rights and Fair Labour Conditions	Page 3
4. Health and Safety in the Workplace	Page 3
5. Environmental Responsibility	Page 4
6. Business Ethics	Page 4
7. Bookkeeping	Page 4
8. Conflict Minerals	Page 5
9. Conflict of Interest	Page 5
10. Confidentiality	Page 5
11. Sub-contracting and Supply Chain	Page 5
12. Monitoring and Corrective Actions	Page 6
13. Reporting Misconduct	Page 6
14. Privacy and GDPR	Page 6

1. Accessing the Code

The Supplier Code of Business Conduct and Ethics is available on our internet website:

www.finderpumps.com

In order to access the code of ethics :

- 1) Go to the website www.finderpumps.com
- 2) From the main page, click on "Download"
- 3) Select Supplier Code of Business Conduct and Ethics
- 4) For any questions concerning the code of ethics, please send an e-mail to the address: HR@finderpumps.com.

2. Purpose

Honesty, integrity, fair business practice, human and labour rights, safety and environmental care are the key factors that lead us in our daily activity.

Each Supplier must comply with all the existing laws and regulations, applicable in the countries where it operates. However, since laws might not be the same all over the world, we expect our suppliers to adopt the guidelines included in our Supplier Code of Business Conduct and Ethics as a basis for all their activities.

3. Human Rights and Fair Labour Conditions

As a Supplier to Finder Pompe, we expect you to respect the personal dignity, privacy and rights of each individual.

You should be committed to keep a work environment free from discriminations and harassment and to comply with applicable labour and employment laws: respect of fundamental workers' rights to ensure their freedom of association, no use of child labour, forced or prison labour, you must grant equal opportunities, fair wages, regular employment and working hour. Additionally, no discrimination, whether for religion, race, political beliefs, nationality reasons, should be tolerated.

Any form of harassment – sexual, physical or psychological, whether explicit or implicit – or mobbing should not be accepted either.

4. Health and Safety in the Workplace

You, as a Supplier to Finder Pompe, should be committed to create a safe workplace.

Goals in this field are:

- To protect the health and safety of people and goods, even if in conflict with other strategic goals.
- To constantly try and avoid accidents and losses on the workplace with determination.

In order to reach given health and safety objectives, you shall:

- Comply with the laws and regulations governing safety.
- Implement health and safety management systems in line with the sector's standards at an international level.
- Guarantee that all the staff members involved receive adequate training and advice in order to allow them to carry out their work in a safe manner and with no danger for their health.
- Cooperate with FINDER Pompe in building a common safety management system for each project.

5. Environmental Responsibility

FINDER pays a great attention to follow environmental practices that help protecting the environment, its employees and the community in which we operate.

Great efforts are paid to minimize the impact on the environment and to comply with all applicable laws and regulations: we expect our Suppliers to do the same.

Suppliers shall have in place an effective environmental policy, procedure and management system to make sure that all their activities are managed in a sustainable and ecological way.

Suppliers must comply with all existing laws and regulations related to the protection of the environment.

6. Business Ethics

You shall conduct your business in full compliance with the laws, rules and regulations of the countries where you operate.

You should carry out your activities with honesty and integrity and you must refrain from any form of corruption. Offering, paying, accepting bribes that could influence or appear to influence anyone's decision in relation to the current business activity, whether to public or private third parties, is against our values, besides violating anti-corruption laws. Bribes may include money, gifts, travel, entertainment, favours, business opportunities, political contributions.

You must respect anti-trust and other competition laws, trade controls and sanctions regimes.

FINDER's Suppliers should comply with the rules related to fair competition and fair trading.

7. Bookkeeping

Supplier's accounting records must be kept according to the existing laws in the country where it operates.

Accounting should guarantee transparency by being grounded on the truthfulness, accuracy and completeness of the information entered and it should not contain any false or misleading registration.

8. Conflict Minerals

Finder Pompe is determined to comply with the requirements related to the prohibition of use of hazardous substances and conflict minerals.

You, as a supplier, should then ensure that all materials supplied are in compliance with the existing regulations and should then establish a policy regarding conflict minerals allowing you to investigate the source of the minerals in question.

9. Conflict of interest

Suppliers should immediately report to Finder Pompe any “conflict of interest” of which they become aware. A conflict of interest is any situation, transaction or relationship involving the Supplier in which the private interest of any Finder Pompe employee might interfere – or appear to interfere – with the interest of Finder Pompe.

10. Confidentiality

Suppliers must protect Finder Pompe’s confidential information and must act to prevent its disclosure, misuse, fraud or theft. Supplier shall carefully handle given information and make sure not to transmit sensitive or confidential information that could affect Finder Pompe, its employees, its Customers or the community.

Alike, the Supplier must respect intellectual property rights. Patents, copyrights or trademarks belonging to others might not be used without the express permission of the owner.

11. Sub-contracting and Supply Chain

You shall apply the same responsible attitude when purchasing goods and services, by making sure that your own suppliers have adopted ethical standards comparable to the ones stated in this Supplier Code of Business Conduct and Ethics.

You shall have in place a process to inform your own Suppliers of the requirements of this Supplier Code of Business Conduct and Ethics and to monitor their compliance.

If you need to work with subcontractors, you have to make sure that they have received copy of this Supplier Code of Business Conduct and Ethics. Additionally, if those subcontractors have to operate in our facility, you must inform us in advance and get our approval. Inform one’s Manager or the Supervisory Body pursuant to Legislative Decree 231/2001 when one is offered or given donations or gifts by third parties, which are not ascribable to ordinary commercial politeness.

12. Monitoring and Corrective Actions

Finder Pompe reserves the right to carry out audits of its Suppliers, at Finder costs and upon reasonable notice, to make sure you are in compliance with its Supplier Code of Business Conduct and Ethics. If the result of such an audit shows that you are not in full compliance with our Supplier Code of Conduct, you shall take all the necessary corrective actions to improve it and meet our expectations.

13. Reporting Misconduct

If you believe that a Finder Pompe employee or anyone acting on behalf of Finder Pompe is not acting in accordance with our Supplier Code of Business Conduct and Ethics, we encourage you to report it to Finder Pompe.

Honest report of a potential misconduct will, for no reasons, have an impact on your relationships with Finder Pompe.

14. Privacy and GDPR

You, as a supplier of Finder Pompe, must ensure that all personal data and information that are processed are treated in compliance with the EU Regulation n. 2016/679 (GDPR) and, as applicable, Legislative Decree 196/03 (Privacy Code).