

freud

Freud S.p.A.

CODE OF ETHICS

APPROVED BY THE MANAGEMENT BOARD OF
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FOREWORD

Freud S.p.A., in the context of its activities and in the conduct of its business, assumes, as essential guiding principles, respect for the law and regulations of the countries in which it operates, as well as internal rules, within a framework of legality, fairness, transparency and respect for the dignity of the person.

Freud S.p.A., inspired and conforming also to the principles enshrined in the "Code of Ethics" and in the "Code of Conduct for Business Partners" of the Group, proposes, with this Code of ethics, to clearly and transparently define the values to which the Company intends to adhere, as well as the criteria of conduct aimed at regulating its activities, taking into account the current provisions of the Italian legal system.

This Code of Ethics also introduces and makes binding for Freud S.p.A. the principles and rules of conduct relevant to the reasonable prevention of the offences indicated in Legislative Decree no. 231 of 8 June 2001.

Purpose of the document

In order to clearly and transparently define the values and principles that Freud S.p.A. is inspired by, as well as the criteria of conduct aimed at regulating its activities, this Code of Ethics has been prepared, the observance of which is required of all those who, in any capacity, cooperate in the pursuit of the business activities. A positive image and reputation are intangible resources essential to the very functioning of the Company and are therefore essential to respect the commitments and ethical purposes expressed in this Code.

Freud S.p.A. is committed to ensure compliance with the moral ethical principles of this Code of ethics by all the Recipients, as defined below, and to this end it will be the responsibility of the Company to disseminate its knowledge and use.

1. SCOPE AND RECIPIENTS

Freud S.p.A. recognizes the principles stated and the rules of conduct dictated by the Code of business (hereinafter referred to as the Code) a positive ethical value; also considers the application of what is expressed in this document fundamental and governing in order to the transparency and legality of all activities related to the Company for any reason. The principles, rules of conduct and conduct set out in this Code are binding on corporate bodies, employees (persons linked by an employment relationship, including managers),

employees (such as interns, trainees and administered workers), external consultants, suppliers, contractors and other collaborators, or the subjects acting in the name and/or on behalf of the Company on the basis of a mandate or other contractual relationship, hereinafter, collectively, the "Recipients".

The Recipients of the norms of the Code are required to observe the prescriptions contained therein and to adapt their behavior and actions to the principles expressed. To this end, the Code shall be circulated in accordance with paragraph 12.

2. PRINCIPLES

2.1 Values

This Code intends to explain the fundamental ethical values of Freud S.p.A. described below.

- a) **Future orientation and profitability**
Our actions are result-oriented. This allows us to secure our future by creating a solid foundation for corporate and foundation social responsibility initiatives.
- b) **Responsibility and sustainability**
We act responsibly in the interests of our company, also considering the social and environmental impact of our actions.
- c) **Initiative and determination**
We act on our own initiative, take on the entrepreneurial responsibility and pursue our goals with determination.
- d) **Transparency and trust**
We communicate business topics clearly and transparently.
This is the best precondition for a relationship based on trust.
- e) **Correctness**
We behave correctly both with colleagues and business partners. This is a key element for our business success.
- f) **Reliability, credibility and legality**
We promise only what we can keep, we keep to the agreements we have made and we respect the law in all our economic negotiations.
- g) **Diversity**
We value and support diversity as a valuable resource: we consider it essential for our success.

2.2 Principles of Social Responsibility

At Bosch, taking responsibility for society and future generations has a long tradition.

We are aware that our entrepreneurial action must be in line with the interests of the Company. Our products and services are primarily aimed at protecting human life and protecting the environment and resources in the best possible way. The principles set out below derive from the basic conventions of the International Labour Organization (ILO).

a) Human rights

We respect and support the observance of internationally recognized human rights, in particular those of our employees and business partners.

b) Equal opportunities

We protect the equal opportunities of our employees, regardless of skin color, race, gender, age, citizenship, social origins, disability or sexual habit. We respect the political and religious convictions of our collaborators as long as they are based on democratic principles and tolerance of different opinions.

c) Integration of disabled people

In our vision, disabled people enjoy the same rights as members of society and professional life. Supporting them in their integration into the company and working with them in a climate of cooperation are essential principles of our entrepreneurial culture.

d) Free choice of work

We reject all forms of forced labour and respect the principle of freely chosen work.

e) Children's rights

We condemn child labour and respect the rights of children. All Bosch Group companies comply with ILO Conventions No. 138 and No 182.

f) Relations with trade unions

We recognize the fundamental right of all employees to join unions, to which they belong according to their own free will. Employees will not be disadvantaged or disadvantaged by their membership of workers' unions.

We respect the right to collective bargaining for the regulation of working conditions according to the respective legal rules in force provided that in line with the ILO Convention No. 98 constructive and marked by mutual trust and respect.

g) Fair working conditions

The remuneration and social benefits reserved for our employees correspond at least to national or local legal standards, regulations or agreements. We comply with the ILO Convention No. 100 on the principle of "equal pay for work of equal value". We observe the national regulations on working time and holidays. Any employee may make representations to their supervisor or management if they feel unfairly or unequally treated regarding their working conditions. Employees will not suffer any disadvantage because of their grievances.

h) Health and safety at work

The safety at work and the physical safety of our employees are a high priority for us. Bosch meets at least national standards for a safe and hygienic working environment and takes appropriate measures to ensure employees' health and safety at work, to ensure that working conditions are not harmful to health.

i) Qualifying

We encourage our employees to train to develop skills and knowledge and to expand and deepen their specific professionalism.

j) Environment

We have a long tradition of commitment to the preservation and protection of the environment. We also strive for further improvements in living conditions in our factories. Our principles reflect responsibility towards the environment and are the basis of many initiatives that are carried out throughout the Group.

k) Realization

Our aim is to implement these principles throughout the Bosch Group. These principles will be included in the "Management System Manual for Quality, Environment and Safety in the Bosch Group" Subsidiaries and Subsidiaries and Production Units are responsible for their concrete realization. Freud S.p.A. will not rely on the cooperation of suppliers who have repeatedly shown that they do not respect the basic conventions of the ILO.

3. CRITERIA FOR CONDUCT IN BUSINESS MANAGEMENT

3.1 General Principles

3.1.1 Responsible, fair and lawful conduct

We respect the principle of legality in all our behaviors, actions, contracts and other activities of Freud S.p.A. In particular, we do not deceive customers, authorities or public opinion and do not participate in scams procured by third parties. Compliance with the principle of legality also includes payment of taxes and customs duties due, compliance with competition and antitrust legislation, a firm ban on corruption and money laundering, the application of the best available technology, obtaining the necessary official authorizations, compliance with the law on export control and respect for the legal rights of third parties. This principle is not only based on the possibility that, in the event of irregularities, substantial commercial disadvantages may be incurred as a result of criminal proceedings, fines or damages actions, but, rather, on the principle of acting exclusively legally, regardless of whether or not this confers an advantage on Freud S.p.A. The legality and values of Bosch are predominant with respect to the demands of customers or other economic interests. We are responsible for enforcing the law in our area of work and are required to monitor our working environment in terms of legality, accountability and fairness.

3.1.2 Conflicts of interest

Secondary activities and shareholdings

Secondary activities of Employees and Collaborators can only be carried out with the prior authorization of the employer of Freud S.p.A. Such authorization is granted if the secondary activity does not affect the primary interests of the company. In addition, employees are only granted a shareholding in competing companies, suppliers

and customers in individual cases and by informing the employer beforehand in writing. In shareholdings, this applies only from a threshold of ten percent. Employees and Collaborators may start business activities with companies in which our partners (spouses) or other close family members are involved or hold managerial functions only after having communicated this in writing to the employer, whether this may affect the business relationship and may result in a possible conflict of interests.

Assignment to business partners for private purposes

Employees and Collaborators may involve a Bosch business partner for private purposes only with the prior written permission of the respective manager, where we deal with the provision or the performance of activities and from this a possible conflict of interest may arise. Excluded from this are goods or services offered in a generic way (products that are offered under the same conditions to all - retail products).

3.1.3 Caution in commercial transactions

In commercial transactions, particular care is required in receiving and spending coins, banknotes, securities and securities in general, in order to avoid the risk of counterfeit or altered values being placed on the market.

3.1.4 Contributions and sponsorship

Freud S.p.A. can adhere to requests for contributions and sponsorships for activities that concern social, environmental, sports, entertainment or art, provided that they come from non-profit entities and associations and have regular statutes and instruments of incorporation, in accordance with the internal rules of the Bosch Group and with the necessary internal authorizations. However, the Company pays particular attention, in adhering to these initiatives, to possible situations of conflict of interest, personal or corporate.

Sponsorship activities can be carried out only after the definition of appropriate agreements and verification of the good repute of the beneficiary and the event/initiative promoted.

3.1.5 Confidentiality of information

In all business processes, the protection of privacy, personal data and the security of all business information must be guaranteed in accordance with the provisions of law. In the technical and organizational protection of data, in particular, in the

protection of unauthorized access and loss of data, we comply with an appropriate standard corresponding to the current state of the technology available and the respective potential risk. In the development of products and new business models, we ensure the timely application of legal requirements regarding data protection and information security.

3.1.6 Communication with the external environment

Any activity of communication and diffusion to the outside (including through the mass media) of news, information and data relating to the Company must comply with the laws, rules and practices of professional conduct, and shall be achieved with clarity, transparency, timeliness and accuracy. Any form of pressure or acquisition of favorable attitudes by the media shall be avoided. In order to ensure the completeness and consistency of the information, the relations between Freud S.p.A. and the mass media can be kept exclusively with the coordination of the functions assigned and carried out by designated interlocutors.

3.1.7 Protection of industrial and intellectual property

The intellectual property of third parties includes both industrial protection rights (such as patents, trademarks, registered projects) and copyrights (such as software, image rights) of third parties. We respect the intellectual property of third parties and you can only use it if you have the rights. We may use and transmit the know-how of third parties not protected by industrial rights or copyrights only if there are no laws to the contrary. Where this third-party know-how has been communicated to us by means of a confidentiality agreement, it may only be used and transmitted by us in accordance with the provisions of that agreement. This includes drawings of products intended for production and individual data, dimensions and tolerances received from third parties. We use third-party software, including "open source" software and firmware, only within the scope of the rights granted and in compliance with the relevant license conditions.

3.1.8 Prohibition of money laundering and money self-laundering

Recipients shall never engage in or be involved in activities that involve money laundering (i.e., acceptance or treatment), the use or self-laundering of proceeds from criminal activities in any form or manner, strictly observing anti-money laundering laws. Employees and collaborators must verify in advance the available information (including

financial information) on commercial counterparties, consultants and suppliers, in order to ascertain their moral integrity, their respectability and the legitimacy of their activity before establishing with these business relationships.

The Company must always comply with the application of laws on organized crime and anti-money laundering, both national and international, in any competent jurisdiction.

3.1.9 Combatting organized crime

The Society strongly condemns and fights with all the instruments at its disposal any form of organized crime, including mafia. Particular care must be taken by the Recipients of this Code of ethics if they are operating in geographical areas, both in Italy and abroad, historically affected by organized crime, in order to prevent the risk of criminal infiltration. Freud S.p.A. will be particularly committed to verifying the due requirements of good repute and reliability in the hands of commercial counterparties, such as suppliers, consultants, contractors and customers. Such attention shall be paid both in the phase prior to the establishment of the relationship and during the relationship, by requesting the information necessary to ascertain its moral integrity, respectability, reliability and legitimacy of the activities carried out.

3.1.10 Environmental protection

It is the task of Freud S.p.A. to avoid dangers for people and the environment, to limit the effects on the environment to a minimum and to use resources sparingly. Processes and activities must comply with internal and legal provisions on occupational safety, health protection, fire safety and environmental protection. The environmental principles that inspire Freud S.p.A. are:

- contain and reduce pollutant emissions and waste generation;
- constantly optimizing the use of resources;
- develop environmentally friendly products and services.

These principles allow you to comply with the commitment of Bosch "Technology for Life". They express the absolute priority of a working conduct according to the principles of legality.

3.1.11 Behavior towards business partners and third parties

Freud S.p.A. respects the rules of fair competition within the framework of legal provisions. It does not allow territorial or customer breakdowns between competitors, agreements or exchanges of information on prices/price components, relations with suppliers and their conditions, as well as production capacity or conditions of offers. The same applies to the exchange of information on market and investment strategies. In general, not only written contracts are allowed, but also verbal agreements or the adoption of tacit parallel behaviors. Freud S.p.A. does not limit customers and suppliers in the definition of their sales prices and disregards any relative interference. Freud S.p.A. observes the respective national regulations on clauses that limit competition in contracts with customers and suppliers. It does not abuse the position of the company on the market, for example by imposing price discrimination, the obligation to purchase other related products or the refusal of a delivery.

3.2 Customer relations

The legality and values of Bosch take precedence over customer requests. The following principles apply to the development and application of product functionalities by Bosch:

- It is not allowed to develop functions for the recognition of cycles/tests (neither in the Bosch platform nor in Bosch projects/software carried out at the request of the customer).
- The application must operate in such a way as to ensure, under normal product activity conditions, the expected characteristics throughout the working area/environment, best protect human life and protect the environment and resources in the best possible way. An optimization of the cycle purely for its own sake is not allowed.

These principles apply to all products (including services) at all stages of product development, particularly during software parameterization or calibration and system design.

The satisfaction of customer requests and the establishment of constructive relations are fundamental objectives.

Freud S.p.A. also undertakes to ensure that advertisements do not contain statements or images that directly or indirectly, by omission, ambiguity or excessive emphasis may mislead the buyer, especially regarding the safety of the product, its nature, composition, suitability for use, recognition or official approval. We make clear and

comprehensive agreements with customers and document them, including any changes and additions.

3.3 Relations with suppliers

Freud S.p.A. selects suppliers exclusively on a competitive basis, comparing price, quality, performance and adequacy of the products or services offered.

In particular, the employees of the Company involved in these processes are required to:

- not to preclude to any supplier, in possession of the requisite requirements, the possibility to compete to the stipulation of offers, adopting in the choice of the shortlist of candidates objective and documentable criteria;
- verify the existence of the reliability and good reputation requirements of the suppliers, before the establishment of the contractual relationship of the same, and the maintenance, during the contractual relationship, of these requirements;
- avoid any kind of discrimination against suppliers located in areas at risk of organized crime, if they have adequate requirements of reliability and good reputation;
- ensure sufficient competition in each tender.

Suppliers are also required to transmit this Code of ethics to their subcontractors.

3.4 Relations with external consultants

In view of the general principles on relations with suppliers (including selection activities), it is specified that in the context of relations with external consultants and other collaborators, corporate bodies, employees and other employees must carefully consider the use of external consultants and collaborators and select counterparties of adequate professional qualification and reputation, respecting the provisions in the choice of suppliers.

4. RELATIONS WITH THE PUBLIC ADMINISTRATION, THE SUPERVISORY AND SUPERVISORY AUTHORITIES AND THE AUTHORITY JUDICIAL

4.1 Entitlement to take on commitments

The assumption of commitments and the management of relations, of any nature, with the Public Administration, to be understood in the broadest sense, such as to include the Public Administration of Foreign States, as well as all those persons who can be qualified as such on the basis

of current legislation and current doctrinal and jurisprudential interpretations, thus including public officials, public service subjects and private bodies entrusted with public services, as well as private subjects subject to public discipline, are reserved exclusively to the corporate functions assigned to this task and to authorized personnel, in strict compliance with current regulatory provisions and applicable regulations.

The same requirements apply in relations with the supervisory and supervisory authorities.

4.2 Ethical rules of conduct

In order to prevent the integrity and reputation of the Company from being compromised, contacts with the Public Administration and supervisory authorities must be monitored and documented.

In their relations with the Public Administration and supervisory authorities, the parties involved are required to be transparent, clear and fair in order to establish a relationship of maximum professionalism and collaboration.

The following applies to members of the Public Administration and supervisory and supervisory authorities:

- no corrupt, active or passive practices or collusive behavior of any nature or in any form in the context of relations with such representatives are permitted;
- it is not allowed to offer money or utility of any kind or to perform acts of commercial courtesy in favor of members of the Public Administration (even in those countries where the donation of gifts/utilities is a common practice), or their relatives, unless it is of modest value and granted in compliance with the company procedures and in any case with the explicit permission of the company bodies or representatives concerned, and provided that, in any case, they cannot be interpreted in any way as a means of influencing them in the performance of their duties (either to act in a given sense or to fail to act) to receive unlawful favors and/or to take unfair advantage of them.

5. RELATIONS WITH OTHER PARTIES

5.1 Shareholders, board of auditors supervisory bodies

The Company undertakes to provide members with accurate, truthful and timely information and to improve the conditions of their participation in corporate decisions, in full compliance with current legislation and the Articles of Association.

In their relations with the control bodies, the parties involved must be transparent, clear and fair in order to establish a relationship of maximum professionalism and collaboration; relationships are established and the information provided subject to supervision and coordination by the corporate functions in charge thereof.

5.2 Trade associations, trade unions and political parties

Freud S.p.A. does not contribute in any way to the financing of parties, movements, committees and political and trade union organizations or their representatives or candidates.

It shall refrain from behaving in such a way as to put pressure, directly or indirectly, on political leaders.

6. DONATION/ACCEPTANCE OF GIFTS OR OTHER BENEFITS

No offer or donation, direct or indirect, of money, gifts or benefits of any kind to executives, officials or employees of clients, suppliers, external consultants, in order to influence them in the performance of their duties and/or to derive undue benefit, or which may even be interpreted as exceeding normal commercial practices or courtesy, or in any case directed to acquire preferential treatment in the conduct of any activity connected to the Company. Acts of commercial courtesy shall be permitted provided that they are of moderate value or otherwise such as not to impair the integrity or reputation of one of the parties, or such as may be interpreted, by an impartial observer, as intended to gain undue and/or improper advantages. The employee who, regardless of his will, receives gifts or other utilities of no small value and in any case in deviation from the above established, must give timely written notice to the Company and behave in accordance with the internal provisions on gifts and gifts.

The Recipients may not bestow gifts, grants or sponsorships of which the amount and/or the beneficiary does not correspond to what is formally defined and authorized by the system of powers and powers in place in the Company and on the basis of the indications contained in the procedures corporate.

7. ADMINISTRATIVE AND ACCOUNTING MANAGEMENT

Freud S.p.A. respects the laws and, in particular, the regulations applicable to all types of administrative and accounting documentation.

The accounting records must be kept in an accurate, complete and timely manner, in accordance with the company's accounting procedures, in order to achieve a true representation of the financial/financial position and the management activity. Adequate supporting documentation shall be kept for each accounting recognition reflecting a corporate transaction. This documentation shall make it possible to identify the reason for the transaction that generated the recognition and the authorization thereof. The supporting documentation must be easily accessible and archived according to appropriate criteria that allow easy consultation by both internal and external control bodies.

8. DILIGENCE IN THE USE OF COMPANY RESOURCES

The corporate bodies, employees and collaborators are required to operate with the required diligence and necessary to protect company resources, avoiding improper use that may cause damage or a reduction in efficiency or otherwise be contrary to the interest of Freud S.p.A. For the purposes of this principle, business resources are intended:

- capital goods and consumables owned by Freud S.p.A.;
- property owned by third parties obtained by concession, loan, lease or use;
- computer applications and devices for which it is required to scrupulously comply with corporate security policies, in order not to compromise their functionality, processing capacity and data integrity.

The use of company resources (such as premises and equipment) is not allowed for use and personal interest of any kind. Any use of company resources that is contrary to the laws in force is prohibited, although from such use may in the abstract derive an interest or an advantage in favor of the Company.

9. PROTECTION OF IT TOOLS

The corporate bodies, employees and collaborators must strictly follow the procedures and policies of the Company in the field of IT security and must use the company's resources

-such as personal computers, telephone sets and other communication tools - in accordance with these procedures and policies, avoiding any behavior that could compromise the functionality and security of the company's IT system.

It is not allowed in any way the alteration of the operation of a computer system or company or the data and information contained in it, or the intervention on programs and archives, for whatever purpose it is carried out.

10. HUMAN RESOURCE MANAGEMENT POLICY

10.1 Personnel selection and recruitment

The evaluation of the personnel to be recruited is carried out on the basis of the correspondence of the candidates' profiles with those expected and the company's needs, respecting equal opportunities and privacy for all stakeholders. The selection function, within the limits of the information available, shall take appropriate measures to avoid favoritism, nepotism or forms of patronage in the selection and recruitment phases. The staff involved in the selection process must declare the presence among the candidates of their relatives, or persons with whom, for whatever reason, there are working or personal relationships.

Freud S.p.A. does not in any way facilitate the entry or transport in the territory of the State of foreigners without the qualifications required by the relevant legislation. Furthermore, the Company does not in any way favor the stay of foreigners who are in a state of illegality on the territory of the State..

10.2 Employment relationship

Staff shall be engaged under a regular employment contract; no form of irregular work or the employment of staff without a regular residence permit shall be tolerated. The Society rejects any form of exploitation and exploitation of the state of need of all workers and abstains from any relationship with intermediaries who are even suspected of recruiting workers taking advantage of the aforementioned state of need.

10.3 Personnel management

The Company avoids any form of discrimination against its employees and collaborators, offering equal opportunities in work and professional advancement.

It is forbidden to instigate or incite discriminatory behavior based on the denial, minimization or apology of the Shoah or crimes of genocide or crimes against humanity or war crimes.

In the context of the processes of personnel management and development, as well as in the selection phase, the decisions taken are based on the correspondence between expected profiles and profiles owned by employees and collaborators (for example in the case of promotion or transfer) and/or considerations of merit (for example, allocation of incentives based on the results achieved). The evaluation of staff shall be carried out in a comprehensive and documented manner, involving those responsible, the personal function and, as far as possible, those who have entered into relations with the evaluated.

In the case of sensitive sectors (for example, purchases and sales), Freud S.p.A. provides for the regular rotation of staff (Job rotation).

10.4 Protection of safety and health at work

Freud S.p.A. is committed to spreading and consolidating a culture of safety, developing awareness of risks and knowledge and compliance with current legislation on prevention and protection, promoting and demanding responsible behavior on the part of all employees and collaborators - as well as contractors, in the relevant areas of competence - and working to preserve and improve, especially with preventive actions, working conditions, health and safety of workers. The activities of the Company must be carried out in full compliance with the current legislation on prevention and protection, with particular reference to what is provided for in the specific applicable preventative regulations; operational management must refer to advanced criteria of environmental protection and energy efficiency, pursuing the improvement of health and safety at work, also - but not only - for the purpose of the reasonable prevention of the offences of manslaughter and negligent personal injury committed with violation of the rules for the protection of health and safety at work.

The Company also undertakes to guarantee the protection of working conditions in the protection of the psycho-physical integrity of the worker and in respect of his moral personality, avoiding that he suffers unlawful conditioning or undue hardship.

11. DIFFUSION AND UPDATING OF THE CODE OF ETHICS

Freud S.p.A. is committed to fostering and ensuring adequate knowledge of the Code of ethics by disseminating it to the Recipients through appropriate effective and adequate information and communication activities.

This Code is published on the Company's website. To ensure the correct understanding of this Code to all employees and collaborators, The responsible function of human resources will endeavor to promote the dissemination of its content and the knowledge and full understanding of the ethical principles and rules laid down. Freud S.p.A. also undertakes to update the contents if needs dictated by changing the context, the reference legislation, the environment or the company organization make it appropriate and necessary.

12. MONITORING THE APPLICATION OF THE CODE OF ETHICS

The Company identifies the Supervisory Body as the institutional body responsible for monitoring and supervising compliance with this Code of ethics. The

- telephone local freephone number +39 06 899 70187 or international +49 30 234 70 999. In order to facilitate the supervisory activities that are the responsibility of the OdV, the Compliance Officer Italy

individual corporate functions, however, ensure that within the organization of Freud S.p.A. and in the behaviors of those who have relations with Freud S.p.A. is respected the Code of ethics, reporting any violation and/or taking the related measures according to the different responsibilities. The Supervisory Body shall in particular:

- monitor initiatives related to the knowledge and understanding of the Code;
- supervise the effective application of the Code, with the support of the competent corporate functions, verifying the consistency between the conduct concretely held by individuals and the principles, the general rules and standards of conduct set out in the document;
- suggest any changes, updates and additions for the revision of the Code;
- receive and analyze reports of violations of the Code;
- make proposals for the possible adoption of sanctions in cases of proven violation of the Code;
- provide any clarification regarding the interpretation or application of the Code.

The mailbox:

PresidenteOdVFreud@freud.it

is available to report the violation or suspicion of violation of the Code.

These reports must be sufficiently precise and detailed and traceable to a specific event or area. The Supervisory Body guarantees confidentiality to the authors of the reports in order to avoid any kind of retaliation, discrimination or penalty, and this also when it provides to transfer the reports received to the Compliance Officer Italy.

With regard to the latter, the report may be submitted through one of the following channels:

- using the appropriate tool "Bosch Compliance hotline" (accessible from the intranet or from the "compliance" section of the www.bosch.it website);
- by e-mail at: compliance.officer@it.bosch.com
- in writing by letter addressed to the C.A. of the Compliance Officer Italy, at Freud S.p.A., via Marco Antonio Colonna, 35, 20125, Milan, with "confidential" wording;

must promptly inform the Supervisory Body about the reports received regarding the alleged or actual violations, of the Code of ethics and the progress and outcome of the investigations carried out.

13. CONSEQUENCES OF VIOLATIONS OF THE CODE OF ETHICS

The behavioral rules defined in the Code constitute a basic reference to which the Recipients must adhere in their relations with the interlocutors, among which the Public Administration has a primary responsibility.

Compliance with the rules of the Code must be considered an essential part of the contractual obligations of employees pursuant to and for the purposes of the applicable legislation. Violations of the rules of the Code of ethics may constitute breach of the primary obligations of the employment relationship or disciplinary offence, with any consequence of law, also with regard to the preservation of the employment relationship and may result in compensation for damages arising therefrom.

The Company undertakes to provide and impose, with consistency, impartiality and uniformity, sanctions proportionate to the respective violations of the Code and in compliance with the current provisions on the regulation of employment relationships. For all other Recipients with whom the Company has contractual relations the violation of the rules of the Code of ethics may constitute breach of contractual obligations, with all consequences of law, also with regard to the termination of the contract and/or assignment and may result in compensation for damages arising therefrom.