ENGLISH VERSION

CODE OF ETHICS

Dear colleagues,

I am pleased to introduce our code of ethics.

This Code of Ethics contains the general guidelines of conduct that are bound to follow, as a strong foundation to achieve our projects. The purpose of this document is to provide a guide to act ethically in everyday work and business situations. These standards must be followed in addition to strict compliance with the applicable Laws and Regulations.

We strongly believe that the cohesion and vigor of our organization are based on the commitment to respect and ensure respect for the values we share. Therefore, this Code of Ethics must be an effective instrument to strengthen and preserve those values as well as an effective tool to prevent and banish behaviors that could threaten them.

I invite you to take the necessary time to read our code completely and ensure its fulfilment. Besides, we are available for any query, comment or explanation regarding it. Thank you for your support.

ELVIO RAMÓN LORENZATI
Presidente

Contents

President's message……..…... 1
Scope, communication and fulfilment…….…….. 3
Values and principles that guide us.…….…. 3
Our principles of ethics and conduct.…… 4

Scope, communication and fulfilment

The Standards of conduct that are established in this document were approved by the Lorenzati Board of Directors and summarize the guidelines that should guide our actions.

This Code applies to all employees as well as the members of the board of directors. For this purpose, the Ethics Committee is in charge of distribution and supervision of its fulfilment.

These Standards are not applicable to our suppliers and customers or their collaborators. However, they will be aware of these Standards, and we expect them to develop their own policies and procedures in compliance with the spirit of this Code and to support our employees to abide them.

All members of the organization must be formally notified about this code and will be asked to formally adhere to these standards. Violation of the established principles, guidelines and commitments set forth in this document will imply the application of disciplinary measures.

If you have a concern regarding unethical conduct or suspect a possible violation of this Code or the Company's policies or the Law, you should report it immediately. The company provides the following channels of communication:

1) Your immediate supervisor or another supervisor you trust
2) HR staff
3) Ethics committee
4) Email addressed to etica@lorenzati.com
5) Mailboxes located in the different offices and plants of the company

The company will not allow retaliation against employees who report misconduct, inform a problem or cooperate with an investigation, as long as the employees have acted in good faith and with a reasonable belief that the information provided is authentic. Anyone who retaliates them will be subject to disciplinary action, which may include dismissal.

This Code is subject to periodic reviews.

Values and principles that guide us

The values and principles that are part of this document are a synthesis of the virtues, qualities and abilities that we have tried to develop from the beginning. They show us the way to perform our daily tasks and establish relationships.
Our values are:

- ***Integrity:*** We act with honesty, transparency, austerity, responsibility and adherence to our principles.
- ***Innovation:*** We promote innovation and sustainability in our products, processes and methods on a daily basis.
- ***Commitment:*** We work together for the benefit of ourselves,the company and society.
- ***Quality:*** We seek to exceed customer expectations by offering products with the highest quality and safety, adding value at each stage of the production chain.
- ***Sustainability:*** We develop our activities with particular devotion to caring for the environment.

Our principles of ethics and conduct

Managers and Directors:

In exercise of their administrative and management functions, the managers and directors are committed to:

- Carry out their activities in a professional, ethical and responsible manner.
- Comply and demand compliance this Code of Ethics and, to achieve this, make the Code known and establish appropriate mechanisms to guarantee application.
- Configure their company as an instrument at the service of creating wealth, making their indisputable objective of obtaining a profit compatible with sustainable, environmentally sound social development, making certain that all activities are carried out in an ethical and responsible manner.
- Inform owners or shareholders periodically and accurately as to the situation of and outlook for the company.
- Comply and demand compliance with generally accepted accounting standards and principles, and establish internal and external risk management and control systems in accordance with the characteristics of our company.
- Keep the books and ledgers of the company in an accurate and honest manner, in order to permit that information be obtained and decisions be taken on an informed and responsible basis.
- Provide our shareholders with a reasonable return on their investment steadily, creating long-term value.
- Provide the company's external and internal auditors with all the information and explanations they require to carry out their work.
- Subordinate their own interests to those of the company when acting on behalf and in representation thereof and not use corporate assets in their own benefit.
- Immediately notify the administrative body as to any event or situation which would represent or could give rise to a conflict between the interests of the company and the individual interests of the director or manager, and abstain from intervening in the resolution.
- Facilitate the transparency of and control over their remuneration in such a way that it is guaranteed to be appropriate to their level of responsibility and performance and to the characteristics of the company.
- Maintain as confidential the background, data and documents to which they have access by virtue of their functions in the company, even when they no longer carry out such functions. Implementing the actions conducive to the safeguarding and security of own, customers and suppliers data that derive from our operation.
- Make payment and comply with debts incurred by the company without unjustified delay or breach, and collect on balances due with the diligence required in each case.
- Choose their collaborators and subordinates in accordance with the principles of merit and capacity, looking only to fulfil the interests of the company.

Our suppliers:

We believe that it is highly important to develop strong relationships with our suppliers of goods and services, based on reliance, honesty, ethics and fair treatment.

We are committed to:

- Search and select only suppliers whose business practices respect human rights, comply with legislation, reject child labor and forced labor and do not place the company's reputation in danger.
- Select suppliers based on the suitability of their products or services, as well as their price, delivery and quality conditions, not accepting or offering gifts or commissions, in cash or in kind, which could alter the rules of free competition in the production and distribution of goods and services.

Our clients:

Our clients are the core reason for our existence. Therefore, our main commitments are:

- Achieve excellence in the goods and services we offer in order to meet our clients' expectations.
- Guarantee the products and services of the company and deal quickly and efficiently with consumer and user claims, with a view to achieving satisfaction beyond mere compliance with prevailing legislation.
- Treat our clients in an ethical manner and according to the current laws. All statements about products and services must be clear, complete and objective. We must never deceive or confuse current or potential customers.

Our competitors:

Regarding competitors, we are committed to:

- Compete in good faith with other companies cooperating to achieve a free market based on mutual respect between competitors and abstaining from engaging in unfair practices. Always compete with integrity and comply with applicable antitrust and competition preservation laws.
- In particular, not take clients from other competitors employing unethical methods.

Our people:

We have a strong commitment to our people. We pretend collaborators to be respected and that they find a suitable space for their professional and personal development.

We are committed to complying with the principles and rights contemplated in the International Bill of Human Rights, the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights and the Ethical Trade Initiative (ETI) Base Code.

In particular, we are committed to:

- Treat our collaborators with dignity, respect and justice, taking into consideration their different cultural sensitivities.
- Not discriminate against employees on the grounds of race, religion, age, nationality, sex or any other personal or social condition different from the conditions of merit and capacity.
- Meet current labor laws and regulations.
- Not permit any form of violence, harassment or abuse at the workplace.
- Do not allow child or forced labor in any of our operations.
- Recognize the rights of association, unionization and collective bargaining.
- Promote the professional development, training and promotion of our people.
- Provide formal communication channels to receive suggestions to improve internal management processes.
- Link the remuneration and promotion of our collaborators to their conditions of merit and capacity.
- Guarantee safety and hygiene on the job, adopting all the necessary measures to maximize the prevention of occupational hazards.
- Endeavor to balance our peoples' work in the company with their personal and family life.
- Facilitate employee participation in the company's social action programs.

Concerning the company and the rest of their colleagues, our collaborators are committed to:

- Comply with the rules of this code of ethics and enforce them.
- Use the information, which they have access, in a responsible and legitimate manner. Keep the confidentiality and security of the information as intellectual property and industrial secret of the Company permanently.
- State any financial or other interest that may affect the interests of the Company. A conflict of interest arises when our personal interests may affect our ability to take decisions on behalf of the company.
- Make an appropriate, responsible and efficient use of the company's assets (including the available technological resources).
- Meet the standards established by the company with due commitment and diligence.
- Work honestly, fairly and respectfully with their coworkers and external people.

For further details, see the Internal Manual for company personnel.

Our community:

Regarding the community, we are committed to:

- Respect human rights and democratic institutions and promote them wherever possible.
- Maintain licit and respectful relationships with public authorities and institutions, not accepting or offering bribes, gifts or commissions.
- Collaborate with Public Entities and non-governmental organizations dedicated to improving levels of social attention for disadvantaged persons.
- Promote volunteering among our staff.

Environment:

We understand that our activities have an impact on the environment. For this reason, we continuously look for ways to reduce our environmental impact through better processes, controlling emissions and improving waste management, water treatment and energy use.
In particular, we are committed to:

- Perform our activities with responsibility in relation to the environment.
- Develop and implement programs and processes that maximize efficiency in the use of available resources.
- Participate in actions that promote environmental care actively.

Modifications: No changes upon review