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Ethical Code

1. General provisions

Cryo Service culture is based on the principles of honesty and respect for others.

The success of a company is deeply linked to the trust that the company can inspire and its good reputation. The diversified activity of Cryo Service requires a high level of attention, honesty and integrity. Consequently, Cryo Service considers its reputation and its corporate culture as an asset of fundamental importance.

All employees have a duty to promote the Company's core values, acting with sense of responsibility towards colleagues, collaborators and society in general.

The main purpose of the Cryo Service Code of Ethics is to ensure that all those who operate on behalf of the Company act on the basis of general ethical rules and on the basis of established rules by the Company in its Management Documents.

This Code of Ethics provides an overview of what Cryo Service considers a responsible behavior, but, nevertheless, not exhaustive. In carrying out their work for Cryo Service each employee undertakes to exercise their judgment and act with care, professionalism and consideration at any time, place and / or circumstance. In this Ethical Code any reference to Cryo Service or the Company must be interpreted as referring to Cryo Service and any of its affiliates and subsidiaries.

2. Scope of application and responsibility

The Code of Ethics applies to all employees of the Company throughout the world, including staff with fixed-term contracts, and to the members of the Board of Directors of Cryo Service and its subsidiaries (the Directors).

One must avoid performing acts or encouraging others to perform acts that are contrary to this Code of Ethics, even if such infringements, in specific circumstances, may appear in the interests of the Company. In case of doubts about the correctness, legality or ethics of a particular action or activity, consult in advance - where possible - your direct superior or contact the Cryo Service Management.

Department managers are responsible for communicating this directive, as well as promoting it, raise awareness and monitor compliance.

Failure to comply with the Code of Ethics will not be tolerated and will be punished with disciplinary actions internal, dismissal and also the exercise of criminal action, according to the laws in force. In case in which unfair practices or irregularities occur within the Company, the Company itself undertakes to take the necessary corrective measures to avoid the repetition of such acts.

This document has been adopted by the Cryo Service Board of Directors.

The management of deviations according to the Cryo Service Management Model will be the responsibility by the Chief Executive Officer (Cryo Service CEO).

3. Complaints, expression of concern and non-sanctioning

Cryo Service encourages a frank discussion of responsible behavior, in context non-bureaucratic and improvement-oriented. This means that every employee will be able to discuss usually their concerns and grievances with superiors.

In case you feel that this is not appropriate, you can contact the staff of the Safety (HSE) and the Management. Such concerns or complaints can be reported in a way confidential, in the preferred language between Italian and English and, if necessary, anonymously.

From a legal point of view, reports on financial matters or relating to accounting procedures potentially incorrect must be reported to the Cryo Service Administrative Manager.

If an employee expresses, in good faith, their concern about a possible violation of the law or of the Company Policy to a competent body of Cryo Service, the employee does not be subjected to any sanction by Cryo Service or any representative of Cryo Service a cause of this report.

Discrimination and harassing behavior against the authors of such reports constitute a violation of this Code of Ethics. However, anyone who makes a false report with evident vexatious intent may be subject to disciplinary action.



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If you believe that having highlighted any violation of this company policy is being used against you in any way, you must contact your superior or Cryo Management Service.

4. Mutual respect

4.1 Interpersonal relationships

All employees or members of Cryo Service Boards of Directors are required to observe impeccable professional and personal behavior towards work colleagues, of the subjects who collaborate with the company and of others in general. By there we also mean demonstrate sensitivity and respect towards cultures and habits other than own.

Cryo Service does not accept any form of harassment, discrimination or any other behavior that colleagues or collaborators may perceive as threatening or degrading.

4.2 Drugs and alcohol

Cryo Service is a drug and alcohol free workplace. It is not allowed to show up and operate under the influence of drugs or alcohol.

It should be noted that the use, even minimal, of the above substances is not permitted, especially if you have to operate on machinery, drive motor vehicles or carry out any other operation incompatible with the consumption of drugs and alcohol.

Every employee and collaborator will refrain from using drugs and alcohol and from encouraging others to use them

such substances. In any case, he will also refrain from any comments, actions and behaviors that may put in a bad light the one who eventually uses it, regardless of the fact that is an employee of Cryo Service or of any partner company of Cryo Service or of any other company with which Cryo Service operates.

5. Equal opportunities

Cryo Service is committed to promoting an engaging corporate culture, and includes and recognizes that each individual is unique and must be valued and respected for their own individual skills.

Cryo Service does not accept any form of harassment or discrimination based on sex, religion, race, national or ethnic origin, cultural background, social group, disability, sexual orientation, marital status, age or political opinions.

Cryo Service will provide equal employment opportunities and ensure all employees are treated fair. Cryo Service employees and business divisions will base their decisions regarding the employees, relating for example to hiring, training, remuneration and promotions, only based on merit, qualifications and other professional criteria. They also strive to develop programs and measures aimed at promoting diversity within the Company on the basis of the principle equal opportunities for all employees.

6. Conflict of Interest and Integrity

6.1 Fraud and Conflict of Interest

Cryo Service employees or board members should not attempt to obtain for themselves (or for third parties connected to them) illegal advantages or advantages that they can in any way harm the interests of the Company, regardless of whether or not it constitutes a fraud.

It is not allowed to concur in decisions, or to try to influence decisions, such that they can give originating a real or perceived conflict of interest. Such circumstances include having a personal interest in the matter in question - economic or otherwise - directly or through third parties.

Any situation of potential conflict of interest must be immediately communicated to the own direct superior. Conflicts of interest may not always present themselves clearly and distinct, so in case of doubt, consult one of your superiors or the Cryo Service Management.



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For particularly delicate functions or tasks, the need to implement will be assessed by routine procedures to identify potential conflicts of interest.

6.2 Corruption, gifts and gratuities

It is forbidden to offer, promise or provide to a public official (or to third parties) any advantage undue for the latter to perform an act as part of the performance of his functions ex officio or refrains from doing it, in order to procure or retain business or other illicit advantages in the conduct of business. This also applies if such an advantage is offered through a intermediary.

It is allowed to offer gifts or other homages to collaborators within the limits of what is good practices commonly accepted at the local level. Gifts or other gifts may be made a provided that they are modest, both in value and in relation to their frequency, and carried out in the right places and moments.

Cryo Service employees and Directors are prohibited from accepting from subjects entertaining business relations with the Company, monetary or other gifts that could influence or be perceived as aimed at influencing the employee's integrity or independence. Gifts or other gifts they can be accepted only on condition that they are modest, both in value and in relation at their frequency, and carried out in the appropriate places and times.

In the event that you have received or have been offered gifts beyond the limits of courtesy commonly accepted, you are required to promptly inform your supervisor or the Management of Cryo Service, which will determine whether your integrity and independence have been put in any way risk.

6.3 Political contributions

Neither Cryo Service, nor any of its employees or members of Cryo Service Boards of Directors make financial contributions to political parties on behalf of the Company. This doesn't preclude anyway Cryo Service to the possibility to support political views in the interests of the Company.

6.4 Financial investments in other companies

As an employee or member of the Cryo Service Board of Directors, you must abstain from having directly or indirectly personal shareholdings in any other company if a because of this, one's loyalty to the Company may be or appear to be compromised.

Before making an investment in a company that competes with the company or that maintains business relationships with the Company (for example, a supplier), with the exception of the acquisition of a stake of less than one percent (1%) in a listed company, you are required to consult your direct superior.

6.5 Activities with competitors, suppliers or partners of the Company

Before engaging in any activity that might be perceived as intended to encourage the interests of a competitor or supplier (or any other person who collaborates with the Company) to the detriment of Cryo Service's interests, including participation in the board of administration of this subject, you should consult your direct superior. All employees and Directors of Cryo Service can't in any form market and promote products or service in competition with Cryo Service business.

6.6 Confidentiality obligation

Information, intellectual property and innovative ideas are an important asset of Cryo Service. These intangible assets must be adequately managed and protected. Politics general openness and transparency of Cryo Service will not prevent it from ensuring adequate data protection for the purpose of protecting the economic interests of Cryo Service.

Any information, except general information, and work experience which an employee or a Director comes into possession of as part of their work it will be considered confidential and treated as such. In this regard, they are of particular importance the rules against the use of confidential information for the purpose of obtaining personal advantages for themselves or for others.



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6.7 Protection of heritage and protection of archives

All Cryo Service employees and representatives are responsible for the protection of assets and the documents owned by Cryo Service, customers and other subjects who collaborate with the company.

All these assets must be used and stored with care and respect, while avoiding waste and improper use.

It is forbidden to use the time, materials, financial assets or facilities of the Company for non-profit purposes directly related to the Company's activities in the absence of the authorization of a representative by Cryo Service.

It is also forbidden to remove or borrow Company assets without permission.

7. Respect for the laws

7.1 General considerations

In carrying out the activity on behalf of the Company, each employee and Director is required to comply with all applicable laws and regulations.

Cryo Service employees and Directors must not participate in illegal activities put in place from subjects who collaborate with the Company, regardless of whether such activities constitute an illegal act for the Company or for themselves.

7.2 Antitrust and competition

All applicable antitrust and competition laws must be observed.

7.3 Archives conservation

Cryo Service has made commitments of transparency and clarity in relation to all transactions of the company, within the limits of compliance with the confidentiality obligations. Cryo Service employees are required to make all the necessary registrations relating to the company's business and its business relations. Not allowed to make false, misleading or artificial entries in books and in all company documents. All transactions must be truthfully documented, complete and recorded in Cryo Service's accounting records.

7.4 Treatment of personal data

Cryo Service is committed to protecting employee information and data as per required by national laws and regulations.

All possible companies connected and participated by Cryo Service will have to process personal data in accordance with the privacy law of the respective country. This means ensuring that any use of personal data, such as the collection, registration, comparison, storage and cancellation or a combination of these is done in accordance with national laws.

8. Respect for the environment

Cryo Service actively promotes respect for the environment. The company has always operated trying to minimize the impact of its business on the environment and on people by respecting regulations and choosing technologies and equipment in step with technological progress and scientific. The choice to apply the ISO14000 environmental management system proved iteration.

9. Steering documents

Employees and Directors are required at all times to comply with the management documents of Cryo Service from time to time in force.

10. How to respond to press and third-party inquiries

Cryo Service will maintain an approach based on openness and honesty in relations with the parties interested outside the company and with society as a whole by communicating consistently and professional.



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In order to ensure a coordinated interface with external parties, requests for information general about the Company or its employees, as well as requests from the mass media, will be forwarded to the Management. Whenever employees or Directors need to make statements public, they must coordinate adequately with the Management.

11. "No rights created"

This Code of Ethics is a declaration relating to certain principles, policies and procedures fundamental of Cryo Service, which govern the activities of employees and Directors of the Company. It does not determine the establishment of rights in favor of customers, suppliers, competitors, shareholders or of any other natural or legal person.