

Code of Ethics

Principles and values of our Company

Preface

Objective of the Code of ethics

The Code of Ethics of Moon's Industries (Europe) S.r.l. (hereinafter: Code of Ethics) is intended to be an added value for the company business, a guide for the asset management and an enhancement of human relationships related to them.

This document summarizes our corporate culture, the values and the rules of conduct that Moon's Industries (Europe) S.r.l. and his collaborators must respect.

The Code of Ethics represents mandatory principle from Model 231 adopted by Moon's Industries (Europe) S.r.l. according to the Italian legislation on the "Responsabilità degli enti per gli illeciti amministrativi dipendenti da reato" contained in Legislative Decree No. 231 of June 8th, 2001.

Structure of this code

The Code of ethics applies to all persons that work directly or not with Moon's Industries (Europe) S.r.l., without distinction in the professional level or position.

The Code of Ethics is divided as follows:

- General Principles
- Compliance with the law
- Business development through ethics
- Implementing provisions
- Code of Ethics approval and further modification

Moon's industries in engaged in promoting and maintaining an adequate internal control system. This system is the sum of the necessary tools used to address, coordinate and control the business rules and his instruments, to protect company assets, to manage activities correctly and efficiently and to supply complete and accurate accounting and financial information.

1. General Principles

Recipients

The Code of ethics applies to those who collaborate with moon's industries, specifically:

Representatives of the corporate bodies and those who hold administration, control or management functions, including those with representative and managing roles

Services and goods suppliers, credit institutes and public authorities must relate to Moon's Industries (Europe) S.r.l. after having understood the basics on which the company sets its operation model in the market.

Code of ethics Sharing

Every employee on the company must be aware of the code of conduct and principles on which the company bases his operations.

Our company promotes, at any level, the spread of the culture and rules featured by the awareness of the existence of controls and the assumption of a mindset oriented to the application of control.

For this reason both the company board and employees have to contribute to the internal control system and diffuse the ethical culture of the business

Living the corporate mission in an ethical way and transmitting those principles to others is part of our professional commitments for which Moon's Industries (Europe) S.r.l. ask for compliance to all recipients

Moon's Industries (Europe) S.r.l. asks his recipients to spread the principles of his mission, this must be considered an ethic commitment and effort.

Work Ethic

All recipients undertake to Moon's industries to work with the maximum effort and to improve and empower his own skills according to the employers' expectations and to their own abilities and possibilities.

Moon's industries Europe S.r.l ensure the correct management of the company information through a proper internal and external communication

The interest of Moon's Industries (Europe) S.r.l. does not have to enter in conflict with the code of ethics rules, this interest must be an inspiration for recipients which cannot work for personal interest or against the company.

2. Compliance with the law

Legislation and regulations

Recipients of the Code of ethics are committed to:

- comply with the laws and regulations in force in the countries in which they operate
- observe the company guidelines, procedures and regulations

-To observe the obligations of diligence and loyalty according to Articles 2104 and 2105 cod. Civil Code;

-to fulfill the indication of behavior of the CCNL in force

Business transparency protection

Moon's Industries (Europe) S.r.l. performs its activities and business in total transparency even in commercial and economic operation related to them.

The main purpose is to interfere laundering, self-laundering and receiving

Privacy

Moon's Industries (Europe) S.r.l. operates according to the Regolamento Generale della Protezione dei Dati - Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27th 2016 and according to the Italian legislation on the subject.

It protects personal data of which it gets hold and adopts the most appropriate conservation and segregation measures in consideration of its concrete operations.

Personal data are only used for the development of its mission.

Safety and health

Moon's Industries (Europe) S.r.l. is aware and respects the directive by the Legislative decree n9 aprile 2008, n. 81 (c.d. «T.U. 81/2008).

in this regard Moon's Industries (Europe) S.r.l. supplies and keeps working area which are clean and healthy it also promotes responsible behavior by all employees

It is strictly forbidden to smoke in areas where smoking could represent danger for health and in other situation where the environment is shared with other people, even if it is not clearly stated

Moon's Industries (Europe) S.r.l. does not forget to value, recognize and ensure the importance of psychological well being of his collaborators through a work policy that respects the human being in his wholeness and complexity

Environmental protection

According to the legal definition, the environment must be considered as a "system of anthropic, naturalistic, chemical-physical, climatic, landscape, architectural, cultural, agricultural and economic factors as a result of the application of plans, projects on the territory in the different phases of their realization, management, or disposal as well as any malfunctioning"

Moon's Industries (Europe) S.r.l. aims to protect the balance of the relation between nature and human activity

Moon's Industries (Europe) S.r.l. pursues this goal, at first, through the tool of precaution and then the management of the risks for human or environment health

Moon's Industries (Europe) S.r.l. still promotes cooperation between members, his Governance and his organizational powers

Relation with the public administration

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Moon's Industries (Europe) S.r.l., through its employees, operate actively with the authorities respecting the current law.

Moon's Industries (Europe) S.r.l. condemns every conduct that could be related to any illicit according to "Titolo II" of the Penal Code named "Dei delitti contro la pubblica amministrazione" or "on illicit against public administration"

According to this, all our employees are required to:

- avoid any behavior that could create any criminal hypothesis as previously stated, even in any abstract way
- any relation with public administration must be conducted using written communication
- archive any communication according to the previous statement
- inform the managing board every three months about the relations with public administration, the reasons and the results of these communications
- avoid to spread any false information in behalf of the company
- Avoid to put personal interests before those of Moon's Industries (Europe) S.r.l.
- . avoid to make any cash payments or any payment without a supporting written document. Any payments must be authorized in anticipation by the responsible commissioner

private-to-private corruption

It is forbidden to offer, give or promise money or any benefit to top managers or someone under their commands, to any supervisory body or to any other person employed in companies or private institution in order to lead them commit any act against their duty of loyalty or any obligation toward their office, even through a third party.

relation with Judiciary and with inspection bodies

Moon's Industries (Europe) S.r.l. ensures the utmost care and a most profitable collaboration with the subjects above mentioned.

No obstructionist behavior is allowed nor tolerated by Moon's Industries (Europe) S.r.l. towards who will not allow any control, access or verification required for justice purposes.

on Corporate crimes

Every representative of Moon's Industries (Europe) S.r.l. must foster the company values even, and especially, to those who are not part of it.

Maximum loyalty and total adhesion of ethical rules supported by Moon's Industries (Europe) S.r.l. are requested

It is therefore required:

- having a correct, transparent and cooperative attitude respecting internal procedures and rules for any activity related to budget establishment and any other social communication, in order to supply

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a correct and truthful information about the economic situation, the financial position and capital of the company to every associate and third parties

-respect any legal provisions designed to protect the nominal capital in order to avoid any infringement on creditor guarantees and generally to third parties

-respect the civil law principles and those written by the "Organismo italiano della contabilità" (Italian Accounting Board) and those of international level provided by the Accounting Standard Board

-ensure the correct operation of the company and of their corporate bodies, guaranteeing and facilitating any form of internal control over the corporate management required by law, as well as the correct formation of the assembly willingness

-any communication required by the law must be provided promptly, correctly and in good faith, avoiding any obstacle to those in charge for this function

3. Business developing through ethics

OUTLOOK AND VALUES

Moon's Industries (Europe) S.r.l.'s company management adopts an open door policy to discussions and supports the needs of his interlocutors, but considering the internal company needs in advance.

Innovation and competition are offset through the sense of duty and respect for others

Thus, any unfair and discriminatory behavior between colleagues will be persecuted by the managing board and by the Governance

The value of the company is built even by the spirit of cooperation between partners which acts as a unique and compact entity

Moon's Industries (Europe) S.r.l. aims to build and hold a relationship of trust with his stakeholders whom contribution is necessary to attend the company mission

Equal treatments promotion

Human rights take precedence to market interests at Moon's Industries (Europe) S.r.l.

Among these, Moon's Industries (Europe) S.r.l., considers of capital importance to operate ensuring equal treatments to those who intend to interact or take part of the company.

There is no distinction in race, nationality, sex, age, sexual and political orientation, philosophical or religious belief nor any item that could, in some manner, characterize people unless it is related to merits achieved by the person.

Moon's Industries (Europe) S.r.l. believes that people are the heart of the company and they represent the ethic idea of the company itself in front of his stakeholders

All recipients must:

-not tolerate sexual, physical or psychological harassment in every form or context it could occur;

-listen to customers, suppliers, and colleagues requests with no prejudice or any behavior with the aim of defending his own position or work

-avoid to take decisions, carry out activities against the company interests or not even compatible with the respect of the office duties while performing their tasks

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- show respect and sensitivity in front of other people avoiding any offensive behavior
- operate according to the existing law and rules both legal and internal to the company
- Moon's Industries (Europe) S.r.l. acts within the values of integrity, honesty, fairness and loyalty

Therefore the company manages his operative structure through a transversal and multilevel system of control in order to avoid any penal and administrative illicit inside his organization:

- offering, even anonymous, channels of communication and reporting
- ensuring communication between employees
- giving importance to the values of listening, clarity, transparency and collaboration

employees and training

Moon's Industries (Europe) S.r.l. cares of the training of his employees and encourages them take part of training programs or refresher courses in relation with the achievement of the company goals

The evaluation system is conducted in an objective and transparent manner and takes into account the compliance of the code of ethics by the employees, this is a precondition for strengthen motivation, equal reward and the achievement of excellent results

Moon's Industries (Europe) S.r.l. ensures that treatment of staff is carried out respecting the fundamental rights and freedom as well as the dignity of those involved as intended by the existing rules

On public funding

Moon's Industries (Europe) S.r.l. protects the principles of the code of ethics of conduct directly and also indirectly. It refuses any form of financing that could favor any behavior which is incoherent with the rules set on this document and that could lead to illicit conduct

gifts, presents and other benefits

Moon's Industries (Europe) S.r.l.'s personnel or collaborators shall never request or accept gifts or other benefits for themselves or others, from managers, officers or supplier from other companies, public administration or institution in order to gain illicit benefit or to influence the freedom of decision of the recipient

Business gift and forms of hospitality are allowed but they must be of modest value and appropriate to circumstances and not improperly influencing the autonomy of decision or compromise reputation or integrity of the recipient

Accounting controlling and transparency

Everyone who is working or operating with or in behalf of Moon's Industries (Europe) S.r.l., directly or indirectly, must cooperate for a transparent management of the accounting of the company, also with the purpose of protecting "third parties"

Moon's Industries (Europe) S.r.l. adopts and encourages politics and procedures oriented to keep trace of the operations and of the financial flows to ensure the veracity of the economic and regulatory accounting findings

4. Implementing provisions

dissemination of the code of ethics

The code of ethics and its updates will have the widest circulation to all internal and external recipients through an appropriate communication and spreading in order to have all its principles and values applied and understood and also to avoid that the individual initiative could generate behavior not consistent with the ethics of Moon's Industries (Europe) S.r.l.

A printed copy of the Code of Ethics is delivered to each director, employee and collaborator at the appointment, hiring or beginning of the relationship with the company

Violations and consequent penalties

Anyone who is aware of any behavior that could be considered a violation of the code of ethic, even abstractly, is required to report it to legal representative.

Moon's Industries (Europe) S.r.l. will not accept any retaliation, discrimination and penalization for any reporting the will be supplied in good will and for protection of the company assets or corporate image

adequate measure will be adopted against Unlawful conduct and his perpetrator, independently of the penal action of the authorities, through communication to the management and adopting sanctioning measurement

Moon's Industries (Europe) S.r.l. will adopt the appropriate sanctions measures in relation to the gravity of the violation according to the CCNL of reference if the violation is attributable to any of the company employee. The respect and observance of this Code of Ethics must be considered an essential part of the contractual obligations of employees.

5.Code of Ethics approval and further modification

implementation of the code of ethics

The code of ethics was approved with express decision of the board of directors.

Moon's Industries (Europe) S.r.l. has the faculty to modify, integrate and expand this document. Every integration or modification will be mandatory for every recipients as soon as it will be disseminated.

The recipients of the code have the responsibility to understand this document even with the support of Moon's Industries (Europe) S.r.l. which is available for any explanation through his administrators.

The code of ethics does not replace the existing and future internal procedures that are effective as far as they are not in conflict with the Code of ethics itself.

Read, approved and signed at [*] on June * 2019 by the Board of Directors.

Moon's Industries (Europe) S.r.l.