

**Code of Business Conduct for Suppliers
according to the Legislative Decree No. 231/2001**

**ROMACO S.R.L.
Robbins & Myers, Inc. Group**

Approved on 26/07/10

1.1 INTRODUCTION AND PURPOSE

Robbins & Myers Group, of which Romaco S.r.l. is member, recognizes the importance of ethical and social values on working place: therefore, Romaco S.r.l. is committed to a responsible management of its activities and of the activities of the reference interlocutors.

This Ethics Code arises from this commitment, with the following aims:

- define the fundamental ethical principles of ROMACO S.R.L. and whose work with and for ROMACO S.R.L., and , in particular, of its suppliers;
- represent one of the elements for the Organizational Model adoption, according to the Legislative Decree no. 231/2001 as far as company administrative liability is concerned.

2 ADDRESSEES AND APPLICATION AREA

The addressees of this Code are all the external subjects (hereafter referred as Suppliers) that establish relationships with ROMACO S.R.L. in the field of the supply of goods or services.

For example, this may involve technical or commercial partners, suppliers, contractors, subcontractors, third-parties, whether organized or individual.

ROMACO S.R.L. is committed to the disclosure of this Code to all Suppliers, to the correct interpretation of its content and to make available tools to support the application.

ROMACO S.R.L. requires its Suppliers to comply with the ethical principles herewith stated, considering this aspect of essential importance for the establishment or continuation of a contractual relationship.

ROMACO S.R.L. shall perform checking and monitoring activity on this Code application, taking into consideration, in case of its violation, sanctions involving the resolution of contract by law; for this purpose, a specific internal organism had been identified.

3 ETHICAL PRINCIPLES OF REFERENCE

3.1 Honesty and Law Respect

The honesty is the primary principle for all the activities of ROMACO S.R.L. and its Suppliers and it is an essential factor in the work management.

The relationships with all the interlocutors are based on criteria and behaviors of fairness, cooperation, loyalty and respect.

ROMACO S.R.L. and its Suppliers recognize and require each other, as key-principle, compliance with laws, rules and regulations in force.

3.2 Transparency and completeness of information and communications

ROMACO S.R.L. and its Suppliers are committed to inform the interlocutors in clear and transparent way about their situation, without illicitly favoring any group of interest or individual.

The informative evidences and any other external communication shall comply with truthfulness, completeness and accuracy requirements.

3.3 Privacy and confidentiality of information

Romaco S.r.l. and its suppliers assure the protection and confidentiality of data and information in its possession and compliance with law as far Privacy is concerned.

3.4 Respect of the individual, impartiality and equal opportunities

ROMACO S.R.L. and its Suppliers promote respect for the physical, moral, spiritual and cultural integrity of the individuals, ensuring working conditions that comply with individual dignity and safe working places.

ROMACO S.R.L. and its Suppliers are committed to apply to its employees and partners the legislation and the labor contracts in force and the respect of the human rights, in accordance with the Universal Declaration of Human Rights.

ROMACO S.R.L. and its Suppliers shall avoid any discrimination based on age, gender, sexuality, health status, race, nationality, political opinions and religious faith in all decisions that affect relationships with their interlocutors.

3.5 Prevention of corruption and conflicts of interest

Taking commitments with the Public Administration is allowed exclusively to functions accordingly authorized.

ROMACO S.R.L. and its Suppliers forbid its partners, employees, consultants or representatives, to give or promise money or other benefits to public officers, persons in charge of public service or, in general, Public Administration or other governmental institution employees, in order to induce them to perform, delay or omit acts of their office or carry out acts contrary to the duties of office.

All forms of gifts to public personnel or public service employees or their families, even through third parties, are forbidden.

Romaco S.r.l. and its Suppliers shall work in order to avoid situations where the personnel involved in the transactions are in conflict with the interests of ROMACO S.R.L. and its suppliers. For this purpose practices of corruption, illegitimate favors, collusion, pressure, direct and/or through third parties, personal and career benefits for themselves or others and other similar behaviors are prohibited.

3.6 Market and Free Competition Protection

ROMACO S.R.L. and its Suppliers shall compete fairly on the market following the competition rules.

ROMACO S.R.L. and its suppliers, by means of the persons acting on their behalf, do not offer or accept money or goods in any form to promote or facilitate the business conclusion for their own benefit in violation of laws or rules in force.

Courtesy gifts are accepted only if their value is small and not noticeable as a tool to get favors or privileges, in violation of existing rules.

3.7 Safety Protection

ROMACO S.R.L. and its Suppliers shall implement and diffuse, in its activities, the culture of safety and risk prevention on working place, by promoting all the actions to reduce the accident risk, including appropriate training of human resources.