

Milan, 12/12/2012

GIFT POLICY - DUE DILIGENCE

To all employees and valued external business partners

Accountability, transparency and innovation are fundamental Moellhausen values and the building blocks with which, through professionalism and hard work, we have constructed an organization that is a model of excellence and point of reference for many.

Our success is closely tied to that of the companies and professionals - internal and external - that share with us the challenge of being the best in their field, who deal with each other without reservation according to their abilities and professionalism and who consider loyalty and respect for the law as the only way to affirm their value.

Our concept of working is to aim high and not allow ourselves to be distracted from our goals. We are, therefore, asking for everyone's cooperation in applying a simple "no-gift policy" intended to make a clear and secure separation between work and any potentially damaging manifestation of friendship, intention or gratitude. This policy can be summed up in the few sentences below.

Moellhausen NO-GIFT POLICY

To avoid conflicts of interest, whether real or apparent, and the need to accurately assess (case-by-case) critical ethical aspects, our company and its employees do not accept gifts or other "advantages" (i.e., any benefit or, direct or indirect, economic contribution offered in any form) from suppliers, customers, resellers, potential colleagues, or any other individual or organization under any circumstances. The Moellhausen's Code of Conduct requires that everyone, whether companies and professionals - internal and external - demonstrate their absolute commitment to treating the people and organizations with which they maintain a work relationship in an impartial manner. In this sense, Moellhausen demonstrates the highest standards of ethics and conduct, reserving equal treatment, without professional exceptions or discriminatory actions towards any vendor, supplier, customer, employee, potential colleague, reseller or supplier and any other individual or organization.

I am confident that the above can be implemented without difficulty in our common interest and I thank you all for your cooperation.

Sincerely
Anthony Moellhausen

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