



COLOMBO ERMANNO & C. S.n.c.

Flexible plastic packaging

since 1960

CODE OF ETHICS

Adopted according to Legislative Decree 231/01

This code was approved by Colombo Ermanno & C. S.n.c. on 24/03/2023

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INTRODUCTION

TARGETS, OBJECTIVES AND RECIPIENTS

Colombo Ermanno & C. S.n.c. is aware that the authority of a company is recognized not only by the competence of its employees and the high quality of the product and the service provided to customers, but also by the attention paid to the needs of the entire community.

The principles that have always inspired the work of this Company are formally collected in a Code of Ethics in the belief that reliability is built daily respecting the rules and valuing people.

This Code of Ethics is a distinctive and identifying element in relation to the market and third parties, whose knowledge and sharing, required of all those who work in the Company or who collaborate with it, constitute the foundation of the business.

The target of Colombo Ermanno & C. S.n.c. is therefore to pursue excellence in the market in which it operates, through a sustainable development, safeguarding the environment and the safety of the people involved through the consistency of a behavior respectful of social ethics, obtaining satisfaction and ensuring added value for the employee, for the customer and, in general, for the community.

This Code of Ethics (hereinafter referred to as "**Code**") illustrates the set of ethical and moral principles that are the basis of the activity of Colombo Ermanno & C. S.n.c. (hereinafter referred to as "**Company**") as well as the lines of conduct adopted by the Company both within its activities (in relations between employees) and outside (in relations with institutions, suppliers, customers, business partners, political organisations and trade unions, as well as the media) (hereinafter referred to as "**Stakeholders**").

The respect of these principles is of fundamental importance to achieve the Company's corporate mission and to ensure its reputation in the socio-economic context in which it operates.

As a preliminary point, the Company firmly believes that every activity must be carried out ethically, recognizing itself in the principle established by article n. 41 of the Constitution, according to which private economic initiative "cannot be carried out in contravention of social utility or in such a way as to damage security, freedom and human dignity."

This code is binding on the directors and employees of the Company, as well as on all those who work and collaborate, on a permanent or temporary basis, on behalf of the Company (hereinafter referred to as "**Recipients**") and who are required to observe it, in any situation and context, the content and inspiring principles within its specific functions and activities.

The code does not replace and does not supersede existing laws and the National Collective Bargaining Agreement, which retain their express and fundamental effectiveness and value.

1 GENERAL PRINCIPLES

The conduct of the Recipients, at all company levels, is based on the principles of legality, fairness, non-discrimination, confidentiality, diligence, and loyalty.

1.1 Legality

The Company operates in full compliance with the law and this Code.

All Recipients are therefore required to comply with all applicable regulations and to keep up to date with legislative developments, also making use of the training opportunities offered by the Company.

The Company considers the transparency of financial statements and accounts a fundamental principle for the exercise of its business and for the protection of its reputation.

1.2 Fairness

Fairness and moral integrity are a duty incumbent upon all Recipients.

Recipients are obliged not to establish any privileged relationship with third parties, which is the result of external solicitations aimed at obtaining improper advantages.

In carrying out their activities, the Recipients are required not to accept donations, favors or utilities of any kind (except for items of moderate value) and, in general, not to accept any counterpart in order to grant benefits to third parties in an improper way.

In turn, the Recipients must not make donations of money or goods to third parties or in any case offer illegal benefits or favors of any kind (except for objects of modest value or commercial courtesy gifts authorized by the Company) in connection with their activities for the benefit of the Company.

The inherent conviction to act in the interest of the Company does not exempt the Recipients from the obligation to observe the rules and principles of this Code on time.

1.3 Non-Discrimination

In the relations with Stakeholders and in particular in the selection and management of personnel, in the work organization, in the selection and management of suppliers, as well as in the relations with institutions, the Company avoids and repudiates any discrimination concerning the age, sex, race, sexual orientation, state of health, political and trade union opinions, religion, culture and nationality of its interlocutors.

The Society, at the same time, promotes integration, promoting intercultural dialogue, the protection of the rights of minorities and vulnerable people.

1.4 Privacy

The Company undertakes to ensure the protection and confidentiality of the personal data of the Recipients and Stakeholders, in compliance with all applicable legislation on the protection of personal data.

The Recipients are obliged not to use confidential information, learned by reason of their work, for purposes unrelated to the exercise of such activity, and in any case to always act in compliance with the obligations of confidentiality assumed by the Company towards all Stakeholders.

In particular, the Recipients are bound to the utmost confidentiality on documents suitable for disclosing know-how, commercial information and corporate transactions.

1.5 Diligence

The relationship between the Company and its employees is based on mutual trust: employees are, therefore, required to work to promote the interests of the company, respecting the values of this Code.

Recipients must refrain from any activity that may conflict with the interests of the Company by waiving the

pursuit of personal interests in conflict with the legitimate interests of the Company.

In cases where the possibility of a conflict of interest may be represented, the Recipients are required to immediately notify the management so that the Company can evaluate, and possibly authorize, the potentially conflicting activity.

In cases of infringement, the Company will take all appropriate measures to end the conflict of interest, reserving its own protection.

1.6 Loyalty

The Company and the Recipients undertake to achieve fair competition, in compliance with national and Community legislation, in the knowledge that virtuous competition is a healthy incentive to innovation and development processes, also protects the interests of consumers and the community.

2 RELATIONS WITH EMPLOYEES AND ASSOCIATES

2.1 Recruitment

The evaluation and recruitment are carried out according to correctness and transparency, respecting equal opportunities in order to combine the needs of the Company, with the professional profiles, ambitions and expectations of candidates.

The Company undertakes to take all necessary measures to avoid any form of favouritism in the selection process of personnel using objective and meritocratic criteria, respecting the dignity of candidates and in the interest of the good performance of the Company.

Staff recruited, including through the implementation of this Code, shall receive clear and correct information about the roles, responsibilities, rights and duties of the Parties.

2.2 Personnel management

The Company protects and values its human resources, striving to maintain the necessary conditions for professional growth, knowledge and skills of each person, carrying out appropriate further training and any initiative to that end.

The Company promotes the participation of workers in the life of the company, providing participatory tools able to collect the opinion and suggestions of workers, ensuring their widest participation.

Without prejudice to the maximum availability towards the Company, no worker may be obliged to perform duties, services or favors not due according to his employment contract and his role within the company.

The Company is firmly committed to countering mobbing, stalking, psychological violence and any discriminatory or damaging behavior of the person's dignity inside and outside the Company premises.

Relationships between employees must be conducted with loyalty, fairness and mutual respect, in compliance with the values of civil coexistence and the freedom of persons.

3 WORKPLACE

The Company is committed to providing its staff with a healthy, safe and dignified working environment.

Safety in the workplace is ensured both by strictly implementing the provisions of the law in force, and actively promoting the culture of safety through specific training programs. Staff training is a central element of the management system adopted.

The Company protects the health of its workers, also ensuring compliance with hygiene rules and health

prevention.

4 BUSINESS MANAGEMENT

4.1 *Compliance with internal procedures*

The Company considers that management efficiency and the culture of control are indispensable elements for achieving the objectives.

Recipients are required to strictly observe the procedures and instructions within the company.

Recipients must act according to their respective authorization profiles and must keep all appropriate documentation to keep track of actions taken on behalf of the company.

4.2 *Account management*

In the accounting management activity, the Recipients are called to act in compliance with the principles of truthfulness, accuracy and transparency, so that the reputation of the Company is protected both internally and externally.

Compliance with these principles also allows the Company to plan its operating strategies according to its real economic and financial situation.

All entries in the accounts must therefore be supported by complete, clear and valid documentation, avoiding any form of omission, falsification and/or irregularity.

In the case financial items based on valuations and estimates, their recording shall be based on criteria of reasonableness and prudence.

4.3 *Protection of assets*

The Recipients carry out their functions trying to rationalize and limit the use of company resources.

The Recipients are required to ensure maximum respect for the means, infrastructure, premises, tools, equipment, materials and functionality of the Company's corporate IT system, promptly informing the management of any use of such equipment that they consider others to make.

Recipients are required to properly enforce security provisions to protect hardware from unauthorized access, which could seriously infringe the personal data protection rights of Company personnel and customers.

4.4 *Communication*

The Company shall make available to Stakeholders appropriate communication tools through which they can interact with the company to make requests, ask for clarification or make complaints.

The Company promotes an effective corporate communication able to put the Company in contact with civil society, in order to receive requests, needs and needs of the community and to spread its values and mission.

The information provided to Stakeholders is complete and accurate so that recipients can make correct and informed decisions.

The advertising of the Company respects ethical values, protecting minors and repudiating vulgar or offensive messages.

5 EXTERNAL RELATIONS

5.1 *Relations with public institutions, political organisations and trade unions*

Relations with the Authorities and the Public Administration must be marked by maximum clarity, transparency and collaboration, in full respect of the law and according to the highest moral and professional standards.

The Recipients, subject to express authorization, cannot relate in the name and on behalf of the Company with the Authorities and with the Public Administration.

In their relations with Public Officials, Public Service Officers, and Public Administration in general, the authorized Recipients will adhere to the highest levels of correctness and integrity, refraining from any form of pressure, explicit or veiled, aimed at obtaining any undue advantage for itself or for the Company.

In this regard, the authorized Recipients will be required to strictly observe the provisions of this Code, as well as, more generally, the directives issued by the Company's management.

The Company does not favour or discriminate against any political or trade union organization.

The Company shall refrain from making any undue contribution, in any form whatsoever, to parties, trade unions or other social groupings, unless specific exceptions are made and always within the limits of what is permitted by the rules in force.

The Recipients are obliged to refrain from any direct or indirect pressure on politicians or trade union representatives.

5.2 Compliance with the rules on the free competition

All Recipients are required to act in such a way as to achieve the best results in commercial competition while respecting the rules of free competition.

It is contrary to the Company's policy to have exchanges of information and/or agreements with any competitor regarding productive and commercial policies that distort the free play of competition.

All the Recipients are therefore invited to submit to the management any doubt or initiative that may fall within the case sanctioned by law, in order to operate in full compliance with the rules.

5.3 Relationship with customers and suppliers

The Recipients deal with third parties with courtesy, competence and professionalism, in the belief that their conduct depends on the protection of the image and reputation of the Company and consequently the achievement of business objectives.

In particular, the Recipients shall refrain from any form of unfair or misleading conduct that may induce customers or suppliers to rely on unfounded facts or circumstances.

The customer is the heart of the business, so the Recipients are required to engage consistently to offer high quality products and services to customers, trying to limit any form of disruption in order to maximize customer satisfaction.

The Recipients are required to carry out the work correctly and promptly in order to ensure not only the growth of the Company but also that of the customer.

Relationships with suppliers are based on loyalty, fairness and transparency.

The choice of suppliers is made on the basis of objective criteria of economy, opportunity and efficiency.

The choice of suppliers is precluded on a purely subjective and personal basis or, in any case, by virtue of interests conflicting with those of the Company.

The Recipients are required to observe and enforce the contractual conditions and maintain a frank and open dialogue with customers and suppliers in line with good business practices.

The Recipients must carry out every possible control and bring to the attention of the Company management the problems that have arisen with suppliers and customers in order to assess the consequences.

6 INTERNAL CONTROL SYSTEM

Compliance with the requirements of this Code is entrusted to the prudent, reasonable and careful supervision of each of the Recipients, within their respective roles and functions within the Company.

All Recipients are invited to report to the management the facts and circumstances potentially in conflict with the laws and with the principles and requirements of this Code.

The management of the Company will take all necessary measures to put an end to the violations, being able to resort to any disciplinary measures in compliance with the law and with workers' rights, including trade union rights.

7 GUIDELINES FOR THE SANCTION SYSTEM

The internal control system is oriented towards the adoption of tools and methodologies aimed at combating potential business risks, in order to ensure compliance not only with laws, but also with internal provisions and procedures.

In fact, the violation of the principles established in the Code and in the procedures indicated in the internal controls compromises the fiduciary relationship between the Company and its directors, employees, consultants, collaborators in various ways, customers, suppliers, business and financial partners.

These violations will therefore be immediately prosecuted by the Company in an effective and timely manner, through the adoption of appropriate and proportionate disciplinary measures with respect to the alleged violation.

The effects of violations of the Code of Ethics and internal protocols must be taken into account by all those who, in any way, maintain relations with the Company. The violation of the provisions of this Code by the Recipients constitutes breach of contractual obligations and may determine, depending on the case, the application of sanctions and disciplinary measures provided by the applicable CCNL.

Disciplinary measures may include, at the sole discretion of the Company, verbal or written recall, suspension or immediate termination of the employment or business relationship or any other measure deemed appropriate in the circumstances. Some violations of this Code may also be prosecuted by administrative or other authorities.

8 FINAL PRINCIPLES

This Code does not constitute or imply in any way a condition of employment or a guarantee of employment. The employment relationship can be terminated according to the terms of the same and in accordance with the applicable regulations. The rules contained in the Code do not represent an exhaustive list of the rules adopted by the Company, nor an exhaustive list of behavioural types liable to disciplinary measures, including dismissal. This Code applies to all employees who will be hired from now on, while for those previously hired it will be approved by them by specific acceptance.