



GENERAL PART

ORGANIZATION, MANAGEMENT
AND CONTROL MODEL PURSUANT
TO LEGISLATIVE DECREE 231/2001



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ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

GENERAL PART

LIST OF REVISIONS

REV.	DATE	NATURE OF THE CHANGES	APPROVAL
1	14.10.2022	Adoption	Board of Directors

INDEX

Terms and definitions

1. INTRODUCTION

2. THE REFERENCE REGULATORY CONTEXT

- a. Legislative Decree n.231/2001 and subsequent amendments and additions
- b. Liable offenses and sanctions
- c. The Guidelines

3. THE MANAGEMENT, ORGANIZATION AND CONTROL MODEL ADOPTED BY PLASTITALIA SCRL . 11

- a. Purpose of the Model
- b. Recipients
- c. Methodology and activities for the construction of the Model
- d. Structure of the Model
- e. Approval, modification and implementation of Model
- f. Elements of the Model

4. SUPERVISORY BODY

- a. Requirements of the Supervisory Body
- b. Causes of ineligibility and incompatibility
- c. Appointment, composition and duration of the Supervisory Body
- d. Revocation of assignment
- e. Powers and functions of the Supervisory Body
- f. Reporting by the Supervisory Body to the corporate bodies and top management
- g. Information flows from and to the Supervisory Body
- h. Regulations on whistleblowing
- i. Confidentiality

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

GENERAL PART

1 PREMISE

This document, accompanied by all its attachments, is the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001 (hereinafter the Model), adopted by PLASTITALIA SPA (hereinafter also Plastitalia or the Company).

The task of supervising the functioning and observance of the rules and principles contained in this Model is entrusted to a Supervisory Body with independent powers of initiative and control.

Plastitalia represents the excellence of Italian industry in the world in the production of polyethylene fittings for water, gas and industrial fluids.

The Company has adopted an integrated management system of procedures and operating instructions certified to the ISO9001:2015, UNI EN ISO 14001:2015 and UNI ISO 45001:2018 standards and to the EMAS regulation.

Furthermore, the Company's products have obtained over 70 certifications which guarantee high quality standards.

2 THE REFERENCE REGULATORY CONTEXT

2a Legislative Decree n.231/2001 and subsequent amendments and additions

The Legislative decree 231/2001 "Discipline of the administrative liability of legal persons, companies and associations even without legal personality" (hereinafter also the Decree), which entered into force on 4 July 2001, has introduced in the Italian system of regulations the concept of administrative liability of legal persons, resulting from the commission by a natural person of a criminally relevant unlawful act (crime). The administrative liability of legal persons or entities is in addition to and does not replace the personal criminal liability of the natural person who physically committed the offence.

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

GENERAL PART

Entities may, therefore, be held liable for some crimes committed or attempted, in their interest or advantage by:

- a) natural persons who hold top positions (representation, administration, management, even of an organizational unit of the entity with financial and functional autonomy) or who exercise, even de facto, the management and control of the entity;
- b) persons subject to the management or supervision of the aforementioned top managers.

The entity's liability is independent of that of the natural person who committed the deed in the interest or to the advantage of the entity itself. Furthermore, said liability is excluded in the event that the agent has committed the fact in his own exclusive interest or that of third parties.

The concept of interest is closely connected to the purpose of the crime: for it to exist, it is sufficient that the crime was committed with the intention of making the entity acquire an economic benefit, without requiring that this be actually achieved.

The term advantage, on the other hand, refers to the concrete acquisition of an economic utility by the entity, regardless of the intentions that prompted the agent to commit the crime.

The legislative Decree no. 231/2001 diversified the entity's liability system according to whether the crime was committed by a person in a senior position or by a person subject to the management/supervision of a person in a senior position.

In the cases in which the offense was committed by persons in a senior position (letter a), the entity's liability is presumed. The entity will therefore have to demonstrate that the crime was committed by fraudulently evading the

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

GENERAL PART

organizational models suitable for preventing crimes of the type that occurred and that there was no omitted or insufficient control by the Supervisory Body, responsible for supervising on the correct functioning and effective observance of the Model itself.

If the offense was committed by a subject in a subordinate position (letter b), the burden of proof is on the judicial authority. The entity will be liable only if the commission of the crime was made possible by failure to comply with the management and supervisory obligations. Non-compliance with these obligations is in any case excluded if the entity, before committing the crime, adopted and effectively implemented an organisation, management and control model suitable for preventing crimes of the type that occurred.

The Organization Model must respond, by express legislative prescription (art. 6 Legislative Decree 231/2001) to the following requirements:

- a) identify the activities in which the crimes referred to in the Legislative Decree may be committed 231/2001;
- b) provide for specific protocols aimed at planning the formation and implementation of the entity's decisions in relation to the crimes to be prevented;
- c) identify methods of managing financial resources suitable for preventing the commission of crimes;
- d) establish information obligations towards the SB, appointed to supervise the functioning and observance of the Model;
- e) introduce a Disciplinary System suitable for sanctioning failure to comply with the measures indicated in the Model.

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

GENERAL PART

2b Predicate offenses and sanctions

The legislator initially focused its attention solely on crimes against the public administration and subsequently intervened on several occasions to strengthen national legislation and bring it into line with international conventions. The entity's liability does not arise from the perpetration of all the types of offenses envisaged by the penal code or special laws by the subjects highlighted above, but is limited to the hypotheses of the so-called predicate crimes specifically envisaged by Legislative Decree no. 231/2001.

In particular, the types of crime referred to by the Decree, organized by category, are the followings:

Type of crime	Normative reference
Crimes against the assets of the Public Administration (Scam)	Art.24
Computer crimes and unlawful data processing	Article 24 bis
Organized crime offences	Article 24 ter
Crimes against the assets of the Public Administration (Corruption)	Article 25
Offenses against the public trust (false currency)	Article 25 bis
Crimes against industry and commerce	Article 25 bis.1
Corporate crimes	Article 25 ter
Crimes for the purpose of terrorism	Article 25 quater
Female genital mutilation practices	Article 25 quater 1
Crimes against the individual personality	Article 25 quinquies
Market abuse crimes	Article 25 sexies

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

GENERAL PART

Crimes of culpable injury and manslaughter committed in violation of the rules on the protection of health and safety in the workplace	Article 25 septies
Crimes of receiving, laundering and using money, goods or utilities of illicit origin, as well as self-laundering	Article 25- octies
Copyright crimes	Article 25 novies
Inducement not to make statements or to make false statements to the Judicial Authority	Article 25 decies
Environmental crimes	Article 25- undecies
Crimes involving the employment of illegally staying third-country nationals	Article 25 duodecies
Racism and xenophobia	Article 25 terdecies
Fraud in sporting competitions, abusive gaming or betting and games of chance performed using prohibited devices	Article 25- quaterdecies
Tax crimes	Article 25- quinquiesdecies

Article 9, paragraph 1, of the Decree identifies the sanctions that can be imposed on the entity in the event that it is recognized as responsible for one of the administrative offenses resulting from a crime, namely:

- 1) the financial penalty;
- 2) disqualification sanctions;
- 3) confiscation;
- 4) the publication of the sentence.

In particular, the disqualification sanctions envisaged are:

- disqualification from exercising the activity;
- the suspension or revocation of authorisations, licenses or concessions functional to the commission of the offence;

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01
GENERAL PART

- the ban on contracting with the Public Administration, except to obtain the performance of a public service;
- the exclusion from facilitations, loans, contributions or subsidies and the possible revocation of those already granted;
- the ban on advertising goods or services;
- the commissioner.

2c The Guidelines

By virtue of what is expressly established in the decree (art. 6 Legislative Decree 231/2001 third paragraph), the models can be adopted on the basis of codes of conduct or guidelines drawn up by the representative and category associations, and communicated to the Ministry of Justice. The Guidelines explain the phases in which the entity should set up an effective system for preventing the risk of committing the offenses envisaged by the decree. The stages are as follows:

1. Identification of potential risks: identification of the risk areas, sector or company process in which it is possible to commit the offenses referred to in the decree, by
 - the inventory of corporate areas of activity (map of corporate areas at risk and relevant crimes);
 - the analysis of potential risks (documented map of the potential implementation methods of offenses in areas at risk).
2. Design of the control system (so-called " protocols" for planning the formation and implementation of the entity's decisions): preparation of a suitable control system, capable of preventing risks through the adoption of specific protocols, through
 - the assessment/construction/adjustment of the preventive control system (documented description of the activated preventive control system and

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

GENERAL PART

any necessary adjustments).

The components of a preventive control system that must be implemented in the Model are:

- Ethical code
- Clear and formalized organizational system
- Authorization system with definition of authorization and signature powers
- Operating procedures (manual or IT)
- Staff communication and training
- Monitoring and reporting system

The control principles that the institution must respect in the construction of the entire architecture system are:

- “Every operation, transaction, action must be: verifiable, documented, consistent and congruous”.
- “Nobody can independently manage an entire process”.
- “Controls must be documented”.

3. Identification of a Supervisory Body, endowed with autonomous powers of initiative and control, which is entrusted with the task of supervising the functioning and observance of the Model and taking care of its updating.

4. Disciplinary System, suitable for sanctioning failure to comply with the measures indicated in the Model.

This Model is drawn up in compliance with the Guidelines of Confindustria, in their latest version.

3 THE MANAGEMENT, ORGANIZATION AND CONTROL MODEL ADOPTED BY PLASTITALIA SPA

3a Purpose of the Model

With the adoption of the Model, Plastitalia sets itself the objective of equipping itself with an internal control system that responds to the purposes and requirements of Legislative Decree 231/2001 .

In particular, the Model aims to:

- promote and enhance an even greater ethical culture within the Company, with a view to correctness and transparency in the conduct of business;
- spread the necessary awareness in all those who work in the name and on behalf of the Company of being able to incur, in the event of violation of the provisions contained in the Model, an offense punishable, on a criminal and administrative level, not only against themselves, but also against towards the Company;
- underline that these forms of unlawful behavior are systematically condemned by the Company, as they are contrary to the ethical-social principles to which it adheres, as well as the provisions of the law;
- inform all interested parties that the violation of the provisions contained in the management, organization and control model will lead to the application of sanctions, or the termination of the contractual relationship;
- introduce a mechanism that allows for the establishment of a permanent process of analysis of company activities, aimed to identify the areas in which the crimes indicated by the Decree could theoretically take place;
- introduce the control principles with which the organizational system must comply so as to be able to concretely prevent the risk of committing the offenses indicated by the Decree in the specific activities that emerged following the analysis of sensitive areas;

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

GENERAL PART

- appoint the SB (Supervisory Body) with the task of supervising the correct functioning and observance of the Model and taking care of its updating.

3b Recipients

The Model applies to all those who perform, even de facto, management, administration, direction or control functions in Plastitalia , to employees, as well as consultants, collaborators and, in general, to all third parties who act on behalf of the Company in the scope of activities considered at risk (hereinafter the "Recipients" of the Model).

The subjects to whom the Model is addressed are therefore required to punctually comply with all its provisions, also in fulfillment of the duties of loyalty, correctness and diligence that arise from the legal relationships of a labour law nature established with the Company.

The Company supervises on the compliance with the provisions contained in the Model, ensuring the transparency of the corrective actions implemented in the event of violation of the same. Plastitalia undertakes to disseminate, within its own organization and externally, the contents of the Model and subsequent updates in a complete, accurate and continuous manner.

3c Methodology and activities for building the Model

For the purpose of preparing the Model, the following steps were taken:

1) identify and map sensitive processes: the objective of this phase was the analysis of the company context, in order to identify in which area/sector of activity and according to which methods any crimes can be committed. It was obtained a representation of the areas at risk and of the sensitive processes, of the already existing controls and of any critical issues;

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

GENERAL PART

2) evaluate the risks and the preventive control system: on the basis of the existing situation as ascertained above, the risks were assessed and subsequently the necessary initiatives were identified for the purpose of adapting the internal control system to the purposes pursued by the Decree and the essential organizational requirements indicated by the reference Guidelines;

3) define the procedures and protocols, an integral part of the control system capable of preventing risks: Plastitalia has approved and implemented within its organization a structured system of procedures and operating instructions aimed at overseeing company processes and preventing the commission of crimes envisaged by the decree;

4) design and implement the Organisation, Management and Control Model: in this phase it was intended to define an internal regulatory system aimed to plan the formation and implementation of the Company's decisions in relation to the risks/crimes to be prevented; this system is made up of the Code of Ethics which establishes the general guidelines and principles which the Company's operations are constantly inspired by; an organization and management model, specifically aimed at preventing the offenses envisaged by the Decree.

Essential, for the purposes of the concrete application and compliance with the Model, is the awareness-raising activity of all corporate structures and levels on compliance with the rules and procedures envisaged by the same; the establishment of a SB with the task of supervising the functioning and observance of the Model and proposing its update.

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

GENERAL PART

3d Purpose of the Model

The Model consists of a General Section and a Special Section.

The General Section describes:

- the regulatory provisions with a brief examination of the Decree and the Guidelines provided by leading trade associations (Confindustria);
- the purposes, structure and elements of the adopted Model;
- the requirements, functions and powers of the Supervisory Body;
- the adopted Disciplinary System;
- the communication activity and the involvement and training of personnel on the Model.

The Special Part, divided into Sections, describes:

- the list of individual offenses belonging to the category;
- the principles of conduct adopted by the Company, in addition to the principles contained in the code of ethics;
- the list of sensitive processes and activities and the corporate procedures that regulate them.

The Annexes to the Model are:

- Attachment no. 1 Code of Ethics
- Attachment no. 2 Disciplinary System
- Attachment no. 3 Risk Assessments
- Attachment no. 4 List of predicate offences
- Attachment no. 5 Governance System (Proxies, delegation of responsibilities and spending powers)

3e Approval, modification and implementation of the Model

The Model is approved and adopted by resolution of the Board of Directors. The Board of Directors has the task, also on the basis of the indications provided by the Supervisory Body, of updating or integrating the Model, following to:

- regulatory updates;
- significant changes in the organization;
- changes in company processes and activities or business areas;
- occurrence of extraordinary events (serious violations, disputes, sanctions, etc.).

Any changes or additions to the Model, also upon proposal of the SB , and to the Model documents are the exclusive responsibility of the Board of Directors, to whom is also assigned the task of determining the appropriate budget endowment for the Supervisory Body for the proper performance of its duties. The changes and additions to the operating procedures or documents of a dynamic nature referred to or attachments of the Model will be approved by the Management / CEO. These documents constitute control principals for sensitive activities, and their substantial changes should also be communicated to the SB.

In any case, the Model must be reviewed on an annual basis in order to verify its adequacy and the need for updating in order to maintain its effectiveness over time.

3f Elements of the Model

This Model is based on the following elements, integrated with each other:

1. Ethical code;
2. Organizational system;
3. Powers of authorization and signature;
4. Actors of control (governance);
5. Procedure system;
6. Mapping of risk areas and controls;
7. Disciplinary System ;
8. Training and information regarding the Model and the decree.

1. Code of Ethics

Plastitalia has adopted its own Code of Ethics (Attachment n.1), which forms an integral part of the Model, in order to guarantee compliance with certain shared ethical values and specific rules of conduct with the aim of preventing the crimes envisaged by the Legislative Decree n.231/2001.

The recipients of the Code of Ethics are employees, directors, statutory auditors, consultants, suppliers and in general all subjects who can carry out activities on behalf of Plastitalia. The Code of Ethics is therefore also applicable to third parties with respect to which compliance with the principles contained in the Code of Ethics is imposed through contractual agreements.

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

GENERAL PART

2. Organizational System

Plastitalia's organizational structure is formalized in a company organizational chart which identifies the roles and responsibilities of each organizational function. This document is referred to in this Model, for the purpose of representing the organizational structure adopted by the Company.

3. Powers of authorization and signature

The authorization system and signatory powers are assigned in line with organizational and management responsibilities.

4. Actors of control (governance)

Plastitalia adopts a traditional scheme governance with the presence of:

- Shareholders' Meeting
- Board of Directors
- Board of Statutory Auditors

5. Procedure system

Plastitalia has approved and implemented within its organization a system of procedures aimed at overseeing company processes and preventing the commission of the offenses envisaged by the decree. The Procedures are fundamental parts of the integrated company management system.

6. Mapping of risk areas and controls

The Mapping of sensitive processes and activities constitutes the premise of the Model adopted by Plastitalia. The document drawn up in compliance with the Guidelines of Confindustria are identified the processes and activities in which the risk of committing crimes may occur and indicates the existing prevention protocols.

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

GENERAL PART

The activity of updating the Mapping is the responsibility of the BoD. The SB has the task of verifying its adequacy and proposing any additions and updates.

7. Disciplinary System

The effective implementation of the Model is guaranteed by an adequate Disciplinary System which sanctions non-compliance of the rules contained in the Model and all its constituent elements.

Plastitalia has adopted a Disciplinary System (Attachment no. 2) which forms an integral part of the Model with the aim of sanctioning non-compliant behavior in a disciplinary manner regardless of the possible initiation of a proceeding or criminal trial.

The Disciplinary System is autonomous and does not replace the legislation governing labor relations such as the Workers' Statute, the Company and National Collective Labor Agreement applied to Company employees.

The recipients of the Disciplinary System are employees, directors, statutory auditors, consultants, suppliers with different modalities.

8. Training and information regarding the Model and the Decree

For the purposes of the effective implementation of the Model, Plastitalia promotes the communication, training and information activities of the Model.

The Company, in collaboration with the SB , promotes the creation of a specific communication and training plan structured by type of recipient, with the aim of ensuring the dissemination of the contents of the Model and the Decree.

The Model is communicated to the Statutory Auditors and the Supervisory Body who receive an authorized copy.

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01
GENERAL PART

To Company employees, it is illustrated by:

- information meetings on the purposes and contents of the model (expressly envisaged for top management);
- posting of the General Part of the Model, the Code of Ethics and the Disciplinary System on the company bulletin board;
- consignment to new hires of an extract of the documentation to be attached to the "information set" usually provided to the employee.

Plastitalia also promotes full publicity of the Model also externally towards third parties through:

- publication on the corporate website of the General Part of the Model, the Code of Ethics and the Disciplinary System;
- information to third parties (customers, suppliers, consultants, etc.).

The training plan provides for the activation of two different types of training:

- general training, addressed to all levels of the organization;
- specific training, which instead concerns top managers or in any case personnel involved in activities at risk of crime.

General training must provide basic knowledge relating to the Decree, the contents and purposes of the Model and the tasks and powers of the SB .

- The specific training must provide knowledge and awareness with the regard of the risks associated with company activities, to the control principals to be activated and to the to the techniques of evaluation of the risks, in order to provide concrete elements for the identification of any anomalies or non-compliance.

The requirements that Plastitalia's training plan must meet are as follows:

- The participation in training courses is mandatory,
- the relator must be a competent subject;
- attendance must be functional to corporate action;
- the training activity must be recorded and verified.

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

GENERAL PART

Training, as established in the guidelines of the professional associations, is provided in the presence and/or with the support of IT platforms for individual and distance learning (so-called e-learning).

4 SUPERVISORY BODY

The leg. Decree n. 231/2001, according to the provisions of article 6, paragraph 1 provides among the indispensable elements for the exemption from the administrative responsibility of the entities, the establishment of an internal body within the entity (Supervisory Body) with independent powers of initiative and control with the task of supervising the functioning of the Model and taking care of its updating.

Plastitalia, in implementation of the regulatory provisions and in order to complete its Organization and Control Model, appoints the aforementioned control body in collegial composition.

The functioning of the SB is governed by a specific Regulation of the SB adopted by the same once it has been set up.

The requirements, tasks and information flows to and from the SB are regulated below.

4a Requirements of the Supervisory Body

The SB, in compliance with the Decree and the Guidelines of the trade associations, must meet the following requirements:

- autonomy: it must be ensured to the SB the complete autonomy, understood as freedom and the ability to decide, to self-determination and action. This autonomy must be exercised above all with respect to the top management, in the sense that the body will have to remain extraneous to any form of interference and pressure from the top management themselves.

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01
GENERAL PART

- **Independence:** the position of the supervisory body must be that of a third-party body hierarchically placed at the top of the command line, free from subservience to the top management. It must not be assigned to the SB operational tasks that could have repercussions on the strategic, operational and financial aspects of the Company.
- **Professionalism:** the requirement of professionalism refers to the specialist technical skills with which the SB must be equipped . In particular, the Supervisory Body must be made up of individuals with specific knowledge of legal matters, control methods and activities, risk assessment and management, business organisation, finance, auditing techniques, etc. as well as specific skills in relation to inspection activity , consultancy and analysis of control systems.
- **Continuity of action:** continuity of action must be understood in terms of the effectiveness of the supervisory and control activity and in terms of the temporal constancy of the performance of the functions of the SB .
- **Honourability:** the members of the supervisory body, given the role they are called to cover, must necessarily present an ethical profile of indisputable value.

4b Causes of ineligibility and incompatibility

The following are considered causes of ineligibility:

- the presence of one of the circumstances referred to in article 2382 of the civil code in relation to the single member of the SB ;
- the initiation of investigations against the individual member of the SB for crimes sanctioned by Legislative Decree no. 231/2001;
- a sentence, which has become final, of the single member of the SB, for having committed one of the crimes sanctioned by Legislative Decree no. 231/2001, of the individual member of the SB;

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

GENERAL PART

The member of the SB, with the acceptance of the appointment, certifies the non-existence of said reasons for ineligibility. The rules described above will also be applied in the event of the subsequent appointment of a member of the SB to replace another member of the body itself.

In cases in which a conviction has been issued, the Board of Directors , pending the final judgment of the sentence, may order, having consulted the Board of Statutory Auditors, the suspension of the powers of the member of the Supervisory Body.

In order to guarantee greater autonomy and independence to the members of the SB , they must not have family ties with the top management nor must they be linked to the Company by significant economic interests or by any situation that could generate a conflict of interest.

4c Appointment, composition and duration of the Supervisory Body

The Supervisory Body is appointed by the Board of Directors, which also determines the remuneration paid to each of the members.

The number and qualification of the members of the SB are decided by the Board of Directors: in the case of Plastitalia the SB is a collegial body.

The Chairman has the task of providing for the completion of all the formalities, such as convocations, definition of the agenda of the meetings. It is possible to envisage the establishment a Secretary of a Supervisory Body to support the coordination of activities and the management of the archive.

The appointment to Supervisory Body must be communicated to each appointed member and formally accepted by them. Subsequently, the BoD communicates to all levels of the organization the appointment and composition of the SB with evidence of the responsibilities, powers and supervisory duties.

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

GENERAL PART

The term of office is set by the BoD at the time of appointment and is renewable by resolution of the BoD . In any case, each member remains in office until the appointment of a successor (so-called prorogatio imperii).

4d Revocation of assignment

The revocation of the office of member of the SB (even limited to a single member of it) is the exclusive responsibility of the Board of Directors , having heard the opinion of the Board of Statutory Auditors.

Each member of the Supervisory Body cannot be revoked except for just cause.

By way of example and without limitation, just cause for revocation means:

- the loss of the subjective requirements highlighted above;
- the occurrence of one of the reasons for incompatibility highlighted above;
- serious negligence in the performance of the SB 's duties ;

Each member of the SB can withdraw from the office at any time, providing the motivation to the BoD , with at least 30 days' notice.

4e Revocation of assignment

The Supervisory Body supervises the effective implementation and updating of the Model.

The tasks entrusted to the SB are:

- Verify the adequacy and effectiveness of the Model:
- verify the suitability of the Model to prevent the occurrence of unlawful conduct, as well as to highlight its possible implementation;
- verify the effectiveness of the Model, i.e. the correspondence between concrete behaviors and those formally envisaged by the model itself;
- verify compliance with the principles of conduct and procedures set out in the Model and detect any deviations.

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01
GENERAL PART

- Taking care of updating the Model:
- take care of the updating of the model, proposing, if necessary, to the Board of Directors the adaptation of the same, in order to improve its adequacy and effectiveness (in consideration of any regulatory interventions, changes in the organizational structure, violations of the model) .
- Promote communication, information and training on the Model and the Decree:
 - promote and monitor initiatives aimed to promote communication, information and training of the Model among all recipients;
 - Responding with the appropriate timeliness, requests for clarification from corporate functions or resources or from the Board of Directors and the Board of Statutory Auditors, if connected or linked to the Model;
 - Periodically report to the BoD / Board of Statutory Auditors on the implementation status and operation of the Model.

4f Reporting by the Supervisory Body to the corporate bodies and top management

The Supervisory Body must report the results of its activity periodically to the Board of Directors and to the Board of Statutory Auditors.

The SB must feed a line of reporting towards the entire Board of Directors and the Board of Statutory Auditors.

To this end, the SB prepares a summary report on its work and an activity plan for the subsequent reference period at the pre-established deadlines.

The SB can be convened at any time by the top management and by the aforementioned bodies and can, in turn, make a request to do so in order to report on the functioning of the Model or on specific situations relating to the implementation of the Model.

4g Information flows from and to the Supervisory Body

The information flows from and to the SB , moreover envisaged by art. 6 of Legislative Decree n.231/2001 which expressly speaks of "disclosure obligations", are one of the tools available to the SB to supervise the efficacy and effectiveness of the Model.

Information flows can be of different types:

- event flows: which occur upon the occurrence of a certain event or situation to be reported to the SB ;
- periodic flows: defined on a periodic basis and agreed with the corporate functions;
- reports : which may come from any employee of the company who detects a danger, possible fraud or other behavior that may constitute a violation of the Model (whistleblowing).

The Company sets up a special e-mail box which, in addition to traditional means of communication, allows employees to report to the SB behaviors that are not in line with those envisaged in the Model.

4h Regulations on reporting of offenses (whistleblowing)

In the Official Gazette, General Series n. 291 of 14.12.2017, has been published the law 30.11.2017 n. 179, "Provisions for the protection of authors of reports of crimes or irregularities of which they have become aware in the context of a public or private employment relationship", entered into force on 29/12/2017.

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

GENERAL PART

The so-called whistleblowing is a tool, conceived and tested in the United States and in Great Britain, aimed at pursuing a dual purpose: to favor the emergence of offences, irregularities, violations of organizational models within the entities, guaranteeing, at the same time, the protection of the person making the report from possible retaliation and/or discrimination. The rule extends to the private sector, through amendments to Legislative Decree 231/2001, the protection of the employee or collaborator who reports significant offenses pursuant to the aforementioned decree (or violations relating to the organisation's model of organization and management) of which he has become aware for reasons of his office. In particular, the new legislation provides that, in art. 6 of Legislative Decree 231/2001, the following paragraphs are added:

“2 bis. The models referred to in letter a) of paragraph 1 provide for:

- a) one or more channels that allow the subjects indicated in article 5, paragraph 1, letters a) and b), to submit, to protect the integrity of the entity, detailed reports of unlawful conduct, relevant pursuant to this decree and based on precise and concordant factual elements, or violations of the organisation's model of organization and management, of which they have become aware due to the functions performed; these channels guarantee the confidentiality of the identity of the whistleblower in the reporting management activities;
- b) at least one alternative reporting channel suitable for guaranteeing, using IT methods, the confidentiality of the identity of the whistleblower;
- c) the prohibition of retaliatory or discriminatory acts, direct or indirect, against the whistleblower for reasons connected, directly or indirectly, to the report;
- d) in the Disciplinary System adopted pursuant to paragraph 2, letter e), sanctions against anyone who violates the measures to protect the whistleblower, as well as anyone who intentionally or grossly negligent makes

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

GENERAL PART

reports that turn out to be groundless.

2-ter. The adoption of discriminatory measures against the subjects who make the reports referred to in paragraph 2-bis can be reported to the National Labor Inspectorate, for the measures within its competence, not only by the reporting person, but also by the trade union organization indicated by the same.

2-quater. Retaliatory or discriminatory dismissal of the reporting subject is null and void. The change of duties pursuant to article 2103 of the civil code, as well as any other retaliatory or discriminatory measure adopted against the whistleblower are also null and void. It is the responsibility of the employer, in the event of disputes related to the imposition of disciplinary sanctions, or to demotions, dismissals, transfers, or subjection of the whistleblower to other organizational measures having negative effects, direct or indirect, on working conditions, subsequent to the presentation of the report, demonstrate that these measures are based on reasons unrelated to the report itself".

The new legislation therefore "impacts" the organizational models adopted pursuant to Legislative Decree 231/2001, requiring, among other things:

- that the entity's organizational models must provide for the activation of one or more channels that allow the transmission of the reports themselves to protect the entity's integrity; these channels must guarantee the confidentiality of the identity of the whistleblower in the reporting management activities. The text provides that there must be "at least one alternative channel", suitable for guaranteeing confidentiality with IT methods;
- that the detailed reports of unlawful conduct (or violations of the organization and management model of the entity) must be based on factual elements that are precise and consistent;
- that the organizational models must provide for disciplinary sanctions against anyone who violates the measures to protect the whistleblower and whoever

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

GENERAL PART

makes, with malice or gross negligence, reports that turn out to be unfounded. In compliance with the new regulatory provisions, Plastitalia establishes the following:

- special channels have been set up which allow top managers and subordinates to report, to protect the integrity of the Company, any illegal conduct, relevant pursuant to Legislative Decree 231/2001, as well as any violation of the Model of which they become aware due to their duties;
- the aforementioned channels, of which at least one with IT methods, guarantee the confidentiality of the whistleblower;
- all acts of retaliation or discrimination, direct or indirect, against the whistleblower for reasons related to the report are prohibited.
- It will be applied the sanctions referred to the Disciplinary System to those who violate the measures to protect the whistleblower and to those who, with willful misconduct or gross negligence, make reports that prove to be unfounded.

4i Confidentiality

The SB has the obligation not to divulge the news and information acquired in the exercise of its duties, ensuring absolute confidentiality and refraining from using the information for purposes other than those inherent in its role as Supervisory Body.

All the information that comes into the possession of the SB is treated in compliance with current legislation on privacy (Legislative Decree no. 196/2003 and subsequent amendments and European Regulation no. 679/2016).