



ETHICAL CODE

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



plastitaliaspa.com

ORGANIZATION MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

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1	14.10.2022	Adoption	Board of Directors

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1 PREMISE

The Code of Ethics (hereinafter also the Code) of PLASTITALIA S.P.A. (hereinafter also Plastitalia or the Company) represents the charter of moral and behavioral rights and duties of the Company, in full respect of the principles of ethical responsibility – social and environmental and the interests of all parties involved (stakeholders).

The Code of Ethics has the purpose of providing guidelines for corporate conduct inspired by ethical values, which goes beyond the threshold of compliance with the law, promoting exemplary behavioral standards, useful for preventing the risk of committing irregularities and behaviors that may undermine the reputation of the Company.

The Code of Ethics is approved by the Company's Board of Directors and forms an integral part of the Organization, Management and Control Model adopted by Plastitalia pursuant to Legislative Decree 231/2001.

The verification of compliance with and implementation of the Code of Ethics is the responsibility of the Supervisory Body (SB) appointed by the Board of Directors pursuant to the aforementioned Legislative Decree 231/01.

2 RECIPIENTS OF THE CODE OF ETHICS

The rules and provisions of the Code of Ethics are applied to shareholders, employees, members of the Board of Directors and extend, as compatible, to third party recipients (suppliers, partners, consultants and anyone else who establishes, for any reason, a collaboration relationship with the Company).

Plastitalia promotes the widest dissemination of the principles and rules of conduct set out in the Code of Ethics and requires the respect by the recipients referred to above. The Code of Ethics can be consulted on the Company's website at www.plastitaliaspa.it.

3 STRUCTURE OF THE CODE OF ETHICS

The Code of Ethics is divided into several sections:

- ETHICAL PRINCIPLES
- CRITERIA OF CONDUCT
- IMPLEMENTATION AND DISSEMINATION SYSTEM

4 ETHICAL PRINCIPLES

4a Respect for the Law

The Company requires its shareholders, directors, employees and collaborators, as well as anyone who performs, in any capacity, representative functions, even de facto, to respect the Law and the Regulations in force at both national and supranational level.

To this end, each recipient undertakes to acquire the necessary knowledge of the rules applicable to the performance of their functions. All personnel are called to collaborate in order to reject and report any illegal or non-compliant conduct with the law.

4b Integrity and honesty

Honesty is a fundamental principle in all Plastitalia's activities, initiatives and communications and constitutes an essential element of business management, like integrity which is expressed in lawful, consistent and appropriate conduct to the circumstances.

4c Sustainable development and environmental protection

The Company absolutely promotes the principle of environmental sustainability, taking into consideration the parameters of the consumption of energy resources and natural raw materials.

Plastitalia has adopted a Management System certified to the UNI EN ISO 14001 standard.

The Company requires all personnel to collaborate in order to safeguard and respect the environment, as a resource to be protected for the benefit of the community, through compliance with all current regulations on the subject of the environment and pollution.

The culture of respect for the environment passes through precise and appropriate staff training.

4d Centrality of human resources and respect for the person

The Company recognizes the central role of human resources and undertakes to guarantee respect for their rights by promoting their social, professional and personal development.

Plastitalia ensures that there are no acts of violence, harassment, psychological coercion and any attitude that could be detrimental to the integrity and dignity of the person.

Relations between people who work or who in any case interact with Plastitalia, at all levels, are based on criteria and behaviors of honesty, correctness, collaboration, loyalty and mutual respect. The Company condemns all sorts of discrimination (by way of example but not limited to, of race, sex and religion).

Plastitalia promotes respect for the physical and cultural integrity of the person and respect for the dimension of relationships with others and gender equality.

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In the management of hierarchical relationships, authority is exercised fairly and correctly, avoiding any form of abuse and prevarication.

All personnel are hired with a regular employment contract and no form of irregular work and/or exploitation of the worker is tolerated.

4e Health and safety protection

The Company pays attention to the physical integrity of its personnel and ensures adequate working conditions and safe and healthy workplaces.

Plastitalia defines the most suitable measures to protect the health and safety of workers, in full compliance with current legislation on the prevention of accidents at work and protection of workers (TUS).

The Company has a Health and Safety Management System certified to the UNI ISO 45001:2018 standard.

4f Customer satisfaction

Plastitalia considers its customers a fundamental element for the success of the Company and, to this end, undertakes to satisfy their needs in terms of quality of the services provided, adapting them to the expectations and needs of the market in which it operates. The Company undertakes to offer ethically correct services, in respect with social rules and the criteria of economy, effectiveness and efficiency, adopting the best management practices, favoring the maximization of corporate assets, guaranteeing control of business risks.

4g Competition protection

The Company recognizes that correct and fair competition is a fundamental element for the development of the company. Recipients are prohibited from

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engaging in acts or behaviors contrary to correct and fair competition between companies.

4h Transparency, completeness and confidentiality of information

The Company bases all its conduct on criteria of maximum transparency, reliability and clarity.

To this end, it defines the roles and responsibilities associated with each process and requires recipients to be transparent in providing their interlocutors, customers and third parties with truthful information. This commitment must also apply to consultants, suppliers, customers and anyone who has relations with the Company.

Plastitalia recognizes as a value the correct information to the shareholders, bodies and competent functions, regarding the management of the Company and condemns the actions of its employees and collaborators that hinder or prevent control by the organizations in charge.

The Company also ensures the confidentiality of the information in its possession, the observance of the legislation on the protection of personal data.

4i Corruption, money laundering (also transnational)

Plastitalia, in pursuing its mission, undertakes to respect the legislation on the fight against money laundering and corruption towards public officials or private individuals on the national and international front.

4l Accounting and tax transparency

In managing accounting and tax obligations, the Company undertakes to guarantee the transparency and correctness of the information that flows into the tax-relevant declarations, working to guarantee the objective and

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subjective truthfulness of the operations carried out and transfused in the declarations themselves, the completeness and correctness of tax documents.

4m Smuggling

All employees and collaborators of the Company who, directly or indirectly, intervene in the importation process must guarantee the regular introduction into the territory of the State of goods subject to border rights, paying particular attention to compliance with customs provisions.

Plastitalia undertakes to ensure preventive verification of the shippers it uses and to guarantee the traceability of customs operations.

5 CRITERIA OF CONDUCT

5a Shareholders and directors

The Company promotes transparency and fairness in information and relationship activities with shareholders.

Plastitalia undertakes to promote the confidentiality of information relating to corporate operations, as well as development projects and strategic guidelines.

The shareholders are required to provide the corporate bodies with the necessary collaboration in order to achieve the corporate purpose of the Company, refraining from any behavior incompatible with the existence, discipline and activity of the same.

The shareholders and directors are required to respect the rules of conduct for personnel as applicable.

5b Personal

Compliance with safety and health regulations in the workplace and the environment

Personnel are required to comply with the rules for the protection of health and safety in the workplace and for environmental protection.

The personnel, within the scope of their duties and responsibilities, participate in the process of assessment and prevention of risks for health and safety and for the environment.

The problems of hygiene and safety and environmental protection encountered within the Company's headquarters or in the execution phases of the production process are discussed and shared; this favors a constructive attitude aimed at formulating concrete operational proposals to improve the prevention of accidents and environmental incidents.

The staff undertakes to give the maximum contribution and to pay attention during the execution of their functions, complying with the instructions given, as envisaged by the widespread procedures and instructions provided by the Management System adopted by the Company.

Use of company assets

The use of the Company's assets, means and equipment must be based on principles of professionalism and correctness, personal and distorted uses of Company assets are prohibited.

Personnel are required to comply with the procedures established for the correct use of company assets. As far as possible and without ever endangering their own safety, personnel must operate in order to reduce the risk of theft, damage or other threats to the assigned assets and resources,

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informing promptly the responsible authorities in the event of anomalous situations.

Conflict of interest

A situation of conflict of interest occurs when, during the working activity carried out by Plastitalia personnel, the ability to judge and objectivity are threatened by their own interests or in any case those relating to connected persons.

Company personnel must not overlap company duties and roles with economic activities and personal and/or family interests.

In the event that a situation of conflict of interest arises, even if only potential, the subjects involved are required to refrain from acting and to promptly notify their hierarchical superior or the Supervisory Body, which evaluates, case by case, actual presence and relevance.

Gifts and other utilities

It is forbidden to offer, accept or promise presents or other forms of benefits, gifts, utilities or preferential treatments that are not attributable to normal practices, commercial or customary relationships, in relations with customers, suppliers, credit institutions, public Administrations etc.

Gifts of modest value are allowed only in occasion of festivities.

Donations and support initiatives, both in the form of donations and sponsorship, provided by the Company are permitted.

Respect for confidentiality

The personnel must be informed of the personal data processed by the company and of the measures adopted for their protection, as required by the privacy laws in the national and European context.

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All information, knowledge and data acquired or processed by personnel in the performance of their functions are the property of the Company and cannot be used, communicated or disclosed without the prior and specific authorization of their hierarchical superior.

5c Providers

The relationships that the Company maintains with suppliers are based on compliance with the fundamental principles referred to in this Code and all personnel are required to avoid situations that could prejudice the supplier's business and its trust.

All commercial transactions are conducted according to the criteria of transparency and fairness, ensuring compliance with the requirements established and required for the selection of suppliers.

The choice of supplier takes place exclusively through objective selection and evaluation criteria, based on the granting of equal opportunities, loyalty and impartiality.

The Company requires its suppliers to respect the principles contained in this Code of Ethics, which is a fundamental aspect for the establishment and maintenance of a correct contractual and/or commercial relationship.

5d Customers and clients

The Company directs its activity towards the satisfaction and protection of its customers or any other client, public or private.

The management of these relationships must be based on the principles of courtesy, availability and professionalism, guaranteeing rapid and qualified responses and taking care to examine any suggestions and reports of complaints.

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The Company correctly fulfills its contractual obligations and commitments by providing clear, complete and compliant information relevant to the provided service.

5e Public Administration

The Company maintains transparent relationships with the Public Administration and, in general, with public institutions based on maximum collaboration and fairness.

It is expressly forbidden for personnel to engage in behaviors that may give rise to ambiguity or that may conceal a lack of transparency, such as:

- the giving or promise of money, gifts or other benefits to Public Officials and/or Public Service Representatives for the purpose of influencing their decisions in view of favorable treatment or undue performance;
- conduct that may even only be interpreted as having a collusive nature or in any case may be capable of undermining the principles of this Code of Ethics;
- the presentation of false declarations to public bodies, in order to obtain public funds, grants/subsidised loans, or concessions, authorisations, licenses or other administrative deeds;
- the solicitation of confidential information that could compromise the integrity or reputation of both parties.

5f Bodies, trade union associations and information bodies

The Company does not favor or discriminate, directly or indirectly, any organization of a political or trade union nature.

Relations with the press and with the means of communication and information, as regards the dissemination of information relating to Plastitalia's activity, must be maintained only by subjects expressly designated for this purpose by the Company.

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Communications to any information body must be truthful, clear, transparent, unambiguous or instrumental; the information must be consistent, homogeneous and accurate.

6 IMPLEMENTATION AND DISSEMINATION OF THE CODE OF ETHICS

6a Dissemination, information and training

The Code of Ethics is brought to the attention of all internal and external stakeholders of the Company through specific information and training activities.

The Company prepares and implements a periodic plan for dissemination, information and training activities aimed at spreading knowledge of the ethical principles and rules of conduct envisaged by the Code of Ethics.

6b Supervisory body

The control over the implementation of and compliance with this Code of Ethics and with the Organisation, Management and Control Model is entrusted to the Supervisory Body (SB) , which, pursuant to Legislative Decree 231/2001, has the task of collect reports of possible violations of the Code and the Model, to promote the most appropriate checks on the nature and seriousness of the violation and to communicate the outcome to the competent bodies.

6c Reports

Any violations of the Code of Ethics must be reported to the SB with a communication sent by e-mail to the specifically dedicated e-mail address or through the additional reporting channels set up by the Company.

The report must be made in writing and documented in a clear and detailed manner.

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The Supervisory Body will analyze the report, possibly listening to the author of the same and the person responsible for the alleged violation, guaranteeing the whistleblower against any type of retaliation, understood as any act that may give rise to even the mere suspicion of being a form of discrimination or penalisation. The Supervisory Body ensures the confidentiality of the whistleblower's identity, without prejudice to legal obligations.

6d Violations of the Code of Ethics

Violation of the Code of Ethics and of the Model compromises the relationship of trust between the Company and the person who commits the violation (shareholders, directors, employees, collaborators, customers and suppliers). If ascertained, the violations will be prosecuted promptly through the adoption of the disciplinary measures envisaged by the Disciplinary System, which forms an integral part of the Model, in compliance with the provisions of the reference National Collective Agreement and the Civil Code.

Compliance with the Code of Ethics is an integral part of the employees' contractual obligations, also pursuant to and for the purposes of art. 2104 of the Civil Code (duty of diligence).

The violation of this obligation constitutes a breach of contract and, therefore, may be the reason for termination of the contract, without prejudice to any compensation for damages deriving to the Company from such violation.

Third party recipients (suppliers, consultants, partners, etc.) are required to respect the provisions of this Code and compliance with the same is a prerequisite for the continuation of the existing professional or collaborative relationship with the Company. To this end, Plastitalia inserts in the assignment letters and contracts, the obligation to respect the provisions contained in the Code of Ethics, under penalty of termination or forfeiture of the contract and/or relationship.