

CODE OF ETHICS

of

Italian Pack 

Approved by the Administrative Body on 13/12/2023

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1. DEFINITIONS

In this document and related annexes, the following expressions have the meanings indicated therein:

- **“Italianpack”**: Italianpack S.p.a., company that has adopted this Code of Ethics (hereinafter also **“Company”**).
- **“Legislative Decree 231/2001”** or **“Decree”**: Legislative Decree No. 231 of June 8, 2001, laying down the *“Rules governing the administrative liability of legal entities, companies and associations, including those without legal personality, pursuant to Article 11 of Law No. 300 of September 29, 2000”*, published in the Official Gazette of the Italian Republic No. 140 of June 19, 2001, and subsequent amendments and additions;
- **“Recipients”**: shareholders, corporate bodies (directors and auditors), employees, agents, proxies, and other persons with whom the Company comes into contact in the performance of business relations (e.g. commercial partners). In general, all natural persons who have an employment relationship with the Company, including temporary workers, collaborators, "trainees" and freelance professionals who have been engaged by the Company;
- **“Organisation, Management and Control Model pursuant to Legislative Decree 231/2001”** or **“Model 231”** or **“Model”**: the organisation, management and control model adopted by the Company pursuant to Legislative Decree 231/01, in order to prevent and limit the commission of the Offences having been committed by Senior Personnel or Personnel subject to the direction of others;
- **“Supervisory Body”** or **“SB”**: the body provided for in Article 6 of the Decree, with the task of supervising the operation of and compliance with the Model, as well as its updating;
- **“P.A.”**: the Public Administration of the Italian State, the Member States of the European Union, the public bodies of the European Union and the European Union itself, foreign States and international bodies of public relevance, as well as all those subjects that can be qualified as such according to the legislation in force and current doctrinal and jurisprudential interpretations. By way of example, the concept of Public Administration includes public officials understood as bodies, representatives, agents, officers, members, employees, consultants and persons in charge of public functions or services, of public institutions, public administrations, authorities standing guarantee and supervision, public bodies at international, state and local level, as well as private bodies in charge of public services, concessionaires of public works or public services and, in general, private parties subject to public rules;
- **“Offences”** or the **“Offence”**: the set of offences, or the individual offence, referred to in Legislative Decree 231/2001 (as may be amended and supplemented in the future);

2. INTRODUCTION

This Code of Ethics (hereinafter also “**Code**”) represents a direct manifestation and explication of the company's policy, inspired by the ethical principles and values that will be stated and explained below.

Italianpack within its activities and in the conduct of its business, assumes, as inspiring principles, the respect for the law and regulations of the Countries in which it operates, as well as internal rules, within a framework of legality, fairness, transparency and respect for the dignity of persons. The Company's policy does not end with compliance with the laws and regulations applicable from time to time, but presupposes adherence to universal principles of business ethics that must guide corporate activities in every territory and/or situation.

The principles and provisions of this Code, which are binding on the Recipients, constitute specific exemplifications of the general obligations of diligence, fairness, integrity and loyalty that qualify the performance of work services and behavior in the work environment, in the belief that the success of the company cannot disregard ethics in the conduct of business.

The Company's application of the laws and regulations of the Countries in which it operates shall be subject to compliance with the fundamental principles of the Constitution of the Italian Republic, as well as with the basic principles of International Law.

The ethical and behavioural principles that will be set out in this Code are to be considered an integral part of the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001, adopted by the Company and, therefore, relevant for the purposes of preventing offences pursuant to Legislative Decree 231/2001. For this reason, any violation or conduct not in accordance with what is detailed herein may be the subject of Reports, in accordance with the Whistleblowing Procedure adopted by Italianpack S.p.a.

It is essential that the rules of conduct and ethics identified herein represent for the Company's employees the common thread that must guide them in the performance of their functions and activities, as well as in compliance with the protocols identified in the Special Part of Model 231.

3. GENERAL INFORMATION

3.1. PURPOSE

The purpose of this Code is to explain and make known those fundamental principles and values that represent the core of the activities and structure of Italianpack S.p.a.

The Company adopts a *modus operandi* inspired by principles of clarity and transparency, strict observance of the law, fair competition, respect for the legitimate interests of stakeholders, customers, suppliers, employees, institutions and the community.

This Code is an expression of a corporate context where the primary objective is to satisfy, in the best possible way, the needs and expectations of the Company's partners, aiming to recommend and promote a high standard of professionalism and to avoid any conduct that runs counter to regulatory provisions, but also public order and morality.

Italianpack S.p.a., in the pursuance of its corporate objective, acts in full respect for the individual and personal protection of each individual, in full respect for free market competition, and in full respect for the environment.

In its relations with the Public Administration, it always acts exclusively in accordance with the principles of fairness and transparency, thus protecting the common good.

3.2. RECIPIENTS

The principles and provisions of this Code are addressed to shareholders, corporate bodies (directors, internal auditors and independent auditors), employees, agents, proxies, and other persons with whom the Company comes into contact in the performance of business relations (e.g. commercial partners). In general, all natural persons who have an employment or collaboration relationship with the Company, including temporary workers, collaborators, "trainees" and freelance professionals who have been engaged by the Company, who are called upon to scrupulously observe the rules and regulations of conduct contained in this Code, as well as in Model 231 adopted by the Company.

The principles and provisions of this Code constitute exemplifying specifications of the general obligations of diligence, fairness and loyalty that qualify the performance of work services and the behaviour that the employee or collaborator is required to observe in the workplace.

In addition, Italianpack S.p.a. undertakes to require all those who act within the Company (partners, collaborators, employees, customers, suppliers) to maintain a conduct in line with the general principles of this Code, to this end disseminating its contents to all those who enter into a relationship with the Company.

4. GENERAL AND ETHICAL PRINCIPLES

This Code aims to set out the Company's fundamental ethical values, such as:

4.1. LEGALITY

Italianpack S.p.a. operates in compliance with the law, in compliance with the provisions of national, regional, local and EU regulations, and in compliance with International Law. All the Recipients of this Code are bound to comply with the laws in force and the internal company rules; in no case may the pursuit of the Company's entrepreneurial interest justify operations that do not comply with them.

4.2. GOOD FAITH AND FAIRNESS

All activities, internal and external, must be governed by the utmost loyalty, Recipients having to operate with a sense of responsibility, in good faith, establishing correct professional and commercial relations, and aiming to enhance and safeguard the company's assets. Successful results depend on the ability to assume personal responsibility and, through its collaborators (directors, employees, etc.), the Company demonstrates a willingness to act as an example of integrity.

4.3. TRANSPARENCY

All actions and relations with stakeholders, as well as with subsidiaries, must be carried out guaranteeing fairness, completeness, accuracy, uniformity and timeliness of information, in accordance with applicable regulatory requirements, within the limits of the protection of know-how and corporate assets.

All corporate activities are carried out ensuring clarity and transparency, as it is always possible to identify exactly those Responsible for each function.

4.4. IMPARTIALITY

The Company repudiates any form of discrimination based on age, gender, sexual orientation, health status, race, nationality, political and trade union opinions and religious beliefs.

This principle applies to both internal relations (selection and management of personnel), and external relations, such as the choice of suppliers.

4.5. SOLIDARITY

Market success is combined with a special sensitivity to human relations, deeply rooted in the Company culture. Trust, respect and mutual assistance between people represent the heart of this entrepreneurial identity and ensure the maintenance of social cohesion.

4.6. DILIGENCE AND PROFESSIONALISM

Directors, employees, internal and external collaborators perform their professional services diligently, working in the interest of the Company and pursuing objectives of effectiveness and efficiency.

All work assignments must necessarily be carried out with the utmost competence and in accordance with company procedures.

Italianpack S.p.a. aims to satisfy and protect its customers by seeking constant improvement of the services provided.

4.7. PROTECTION OF THE INDIVIDUAL AND HUMAN RESOURCES

The Company recognises the centrality of human resources in the conviction that the main factor for the success of any business is the professional contribution of the people working in it, within a framework of loyalty and mutual trust. The employees and collaborators of Italianpack S.p.a. represent a fundamental capital. For this reason, the Company protects and promotes the value of human resources in order to improve and enhance the assets and the competitiveness of the skills possessed by each member of the workforce. The Company values and respects the dignity, honour and reputation of its employees and external collaborators and of people in general.

4.8. RESPECT FOR HUMAN RIGHTS AND HUMAN DIGNITY

The Company and anyone working for it must respect the dignity of persons, whether colleagues, suppliers, customers or other interlocutors and avoid any discrimination, direct or indirect, based on political, religious, racial, language or gender grounds, recognising the absolute value of the fundamental principles of the Constitution of the Italian Republic.

4.9. HEALTH AND ENVIRONMENTAL PROTECTION

The Company protects the health of its workers, as well as of any third party that establishes relations of any kind with it (even occasional), guaranteeing a healthy and wholesome working environment, free of any form of danger or risk to physical or moral integrity.

Italianpack S.p.a. operates by implementing measures for the prevention and management of occupational risks, considering respect for workers' rights to be essential in the performance of economic activities, and orienting the management of labour relations towards equal opportunities, professional growth of the individual, valuing diversity.

The Company, in full compliance with Article 9 of the Constitution, aims to protect the environment and biodiversity and, to this end, is committed to choosing technologies, programmes and corporate strategies to prevent pollution in all its forms, evaluating the environmental impacts of the services offered.

The Company operates according to high quality standards, verified and certified according to the main international regulations.

4.10. CONFIDENTIALITY OF INFORMATION

The Company ensures the confidentiality of the information in its possession and renounces the search for confidential data, except in the case of express and knowing authorisation and in compliance with current legal rules. The company's employees and collaborators are bound not to use confidential information for purposes unconnected with the performance of their work.

Under no circumstances shall employees use unlawful or unfair means to acquire confidential information from or about any person, customer or competitor of the Company. Employees must refuse confidential information offered or held by third parties.

Employees are not allowed to take advantage through manipulation, disguise, concealment, abuse of privileged and confidential information and trade secrets, misrepresentation of material facts or any other unfair practice.

4.11. RESPECT FOR MARKET PROTECTION AND COMPETITION

For Italianpack S.p.a. it is fundamental for the market to be self-determining in a way that is loyal and fair for all operators, in accordance with Article 41 of the Constitution and the relevant European legislation.

The Company bases its actions on the principle of Freedom of Market, which guarantees opportunities for participation and affirmation through merits and quality products.

5. PRINCIPLES OF CONDUCT IN RELATIONS WITH THIRD PARTIES

5.1. RELATIONS WITH THE PUBLIC ADMINISTRATION

In their relations with the P.A., the Recipients act in compliance with the principles of fairness, transparency, clarity, professionalism and verifiability, having particular regard to the provisions dictated by the codes of conduct for employees of the P.A. or of the managing entities applicable from time to time.

The Recipients shall promote lawful and correct relations within the framework of maximum transparency and refuse any form of promise or offer of payment or goods to promote or favour any interest or advantage.

Each employee or collaborator of the Company shall refrain from establishing personal relationships, direct or indirect, with representatives of Public Administrations and supervisory authorities that are suitable for allowing the exercise of undue influence or interference in the pursuit of the public interest underlying the administrative action.

In general, the Recipients are not allowed to promise, offer or pay, directly or through intermediaries, money or gifts or other benefits to directors, officers or employees of the P.A., or to their family members, not even on festive occasions, in order to influence them in the performance of their duties (either to act in a certain way or to omit to act) and/or to gain undue advantage. In particular, during a business negotiation, commercial relationship with the P.A., or requests for grants/subsidies/funds made against the State or European Communities, it is forbidden to take (directly or indirectly) the following actions:

- examining or proposing employment and/or business opportunities that may benefit P.A. employees on a personal basis;
- offering or in any way provide free gifts;
- soliciting or obtaining confidential information that may compromise the integrity or reputation of both parties.

If Recipients receive requests or proposals for benefits from Public Officials, they must immediately suspend the relationship and report the fact internally to the Departmental Manager, as well as to the Administrative Body and the Supervisory Body, who may consider taking the matter to the Competent Authorities.

It is the obligation of any director, employee or collaborator who finds himself or herself in a position, even if only potential, that may give rise to a conflict of interest with a public official or a person in charge of a public service, to give prompt notice to the Administrative Body or the Supervisory Body thereof.

The Public Official or the Person in Charge of a Public Service may find himself or herself in a conflict of interest when the particular personal position of the director, partner, employee or collaborator is, even if only potentially, capable of affecting his or her impartiality or, in any event, his or her autonomy of judgement (for example, in the case of a family relationship with the Public Official or in the case of a private relationship between the parties).

The Company may not be represented in individual cases, in relations with the Public Administration, by a person who may create a conflict of interest situation.

5.2. RELATIONS WITH CUSTOMERS

The selection of suppliers and the purchase of goods and services shall be made without discriminatory purposes and on the basis of objective assessment about professional capabilities and technical reliability as well as cost-effectiveness.

Relationships with suppliers are constantly and carefully monitored in order to verify that the services rendered meet contractual provisions.

Suppliers and consultants used by Italianpack S.p.a. are subject to the provisions of this Code, as they are compatible.

Within their relations with suppliers, directors, employees, collaborators and Recipients in general are required to:

- establish efficient, transparent and collaborative relationships, maintaining an open and frank dialogue in line with the best business practices;
- obtain the co-operation of suppliers in order to constantly ensure the most convenient ratio between quality, cost and delivery time;
- demand the application of contractual terms and conditions;
- require suppliers to adhere to the principles of this Code and include appropriate provisions in contracts;
- operate within the regulations in force and demand their punctual compliance;
- observe and comply in supply relationships with applicable legal provisions and contractually agreed conditions;
- be guided by the principles of fairness and good faith in dealing with suppliers, in line with the strictest business practices.

5.3. RELATIONS WITH SUPPLIERS

Within their relations with collaborators, directors, employees and Recipients in general are required to:

- carefully assess the opportunity of using the services of external collaborators and select counterparts of appropriate professional qualification and reputation;
- establish efficient, transparent and collaborative relationships, maintaining an open dialogue, in line with the best business and professional practices;
- obtain the co-operation of collaborators in constantly ensuring the most convenient ratio between quality of service and cost;
- demand the application of contractual terms and conditions;
- require collaborators to adhere to the principles of this Code and include appropriate provisions in contracts;
- operate within the regulations in force and demand their punctual compliance.

5.4. RELATIONS WITH TRADE ASSOCIATIONS, TRADE UNIONS AND POLITICAL PARTIES

The Company undertakes to establish and maintain constant cooperation with trade associations and trade unions on the basis of principles of fairness and transparency, within the legislative provisions and the provisions contained in the applicable collective bargaining.

The Company does not make direct or indirect contributions to political parties, movements, committees and political and trade union organisations, nor to their representatives.

5.5. PROHIBITION OF GIFTS AND GRATUITIES ALSO IN RELATIONS WITH PRIVATE INDIVIDUALS

Without prejudice to the provisions of Paragraph 5.1., it is prohibited to directly or indirectly offer money, gifts or benefits of any kind whatsoever to directors, officers or employees of customers, suppliers, collaborators, in order to influence them in the performance of their duties and/or to gain undue advantage.

With exclusive reference to relations with private individuals, acts of commercial courtesy are permitted provided they are of modest value or, in any case, are not such as to compromise the integrity or reputation of one of the parties or to be interpreted, by an impartial observer, as aimed at acquiring undue and/or improper advantages.

Directors, employees and collaborators are prohibited from accepting, for themselves or for others, gifts or other benefits, with the exception of gifts of modest value and/or attributable to normal and proper relations of courtesy on festive occasions, which do not compromise the integrity or reputation of one of the parties and cannot be interpreted by an impartial observer as aimed at acquiring undue and/or improper advantages.

Any employee who, independently of his or her will, receives gifts or other benefits of non-modest value and in any case in contrast to the provisions laid down above, shall promptly notify the directors in writing, who may determine their return.

6. GENERAL PRINCIPLES OF CONDUCT

The Company has a set of rules of organisation and management aimed at implementing an effective system of planning, execution and control of its activities, such as to prevent the commission of certain offences by qualified persons operating in its interest.

Fraudulent practices and conduct, acts of corruption and favouritism are prohibited in professional and business relations and relationships.

Directors, employees and collaborators must ensure that every decision is taken in the interests of the Company, in line with its principles of good corporate and business management.

They must, therefore, avoid all situations and activities in which a conflict of interest may arise between personal and/or family economic activities and the duties covered, such as to interfere with or affect their ability to make decisions in an impartial and objective manner (e.g. pursuing a personal interest in the use of their corporate role).

Directors, employees and collaborators must avoid any abuse of their position for the purpose of obtaining undue advantages for themselves or others.

Within this organisational model, this Code sets out ethical principles and general criteria of conduct both in relations with external interlocutors and the market, and in relations with employees and collaborators.

6.1. DUTIES OF DIRECTORS AND SECTOR MANAGERS

The Administrative Body and the Departmental Managers, in compliance with their addressing function, must implement the values and principles contained in this Code, ensuring their observance and dissemination among all operational units and at all levels.

Therefore, they ensure:

- the constant adaptation of the Code to regulatory developments;
- the provision of information and clarification concerning the interpretation and implementation of the rules contained in the Code;
- the analysis of any reports of violations of the rules of the Code.

6.2. COMPETITION

It is of major importance that the market is based on free, fair and loyal competition.

The Company, therefore, supports free and fair competition and directs its actions towards obtaining competitive results that reward ability, experience and efficiency.

Any action aimed at unlawfully altering or distorting the conditions of normal competition in the reference market is contrary to the Company's corporate policy and is forbidden to any person acting in its interest, regardless of the form that such action may take.

The Company is committed to scrupulously observing the relevant laws and complying with the interventions of the market regulatory authorities.

6.3. SAFETY AND HEALTH

Italianpack S.p.a., in this respect, complies with the following fundamental principles and criteria:

- a) avoiding risks;
- b) assessing risks that cannot be avoided;
- c) combating risks at source;
- d) adapting equipment and working methods;
- e) planning prevention;
- f) giving appropriate instructions to workers.

The company complies with these principles in taking the necessary measures to protect the health and Safety of Workers, including occupational risk prevention activities, providing the organisation and means necessary for prevention, and training and information activities.

Italianpack S.p.a. provides safe and healthy working environments for all personnel, in compliance with current legislation on accident prevention and protection of workers in the workplace, in order to safeguard the physical and moral integrity of people.

The Company guarantees the provision of all means and tools necessary for the protection of workers' health, undertaking to monitor compliance with the rules of conduct required of Workers to safeguard their safety.

The Recipients are obliged to conform their conduct to the regulations in force on safety at work and the prevention of accidents at work and to any other information that the Company may communicate to employees and/or collaborators on this subject.

The Recipients are also obliged to implement the procedures relating to safety measures at work contained in the risk assessment document and related documents.

6.4. INTEGRITY AND PROTECTION OF THE INDIVIDUAL - HUMAN RESOURCES MANAGEMENT

Italianpack S.p.a. recognises the centrality of work as a fundamental factor in the success of any business and is committed to protecting the moral integrity of employees and collaborators by ensuring the right to working conditions that respect the dignity of the individual.

In particular, it safeguards workers from acts of psychological violence and counteracts any attitude or behaviour that is discriminatory or harmful to the individual, his or her beliefs and preferences.

Sexual harassment or behaviour or speech that may offend a person's sensibilities is in no way allowed or tolerated. Any violations may be reported to one's superior or other persons designated for this purpose who, guaranteeing the anonymity of the reporter, will assess the actual violation and, if necessary, take steps to initiate the consequent disciplinary procedure.

In accordance with the principle of solidarity, the employment policy is aimed at the creation of stable relationships, the personalised training and the enhancement of human resources, within a framework of mutual loyalty and trust with the employer.

Personnel is employed under employment contracts in accordance with current legislation and collective bargaining. No undeclared work or "moonlighting" is permitted.

Before the employment relationship is established, each employee receives adequate information on the regulatory and remuneration contents of the relationship. The relationship is conducted in full compliance with the applicable collective agreements and social security, tax and insurance regulations, having as primary reference the protection of the worker's dignity.

Before employing a non-EU employee, it undertakes to ascertain the regularity of the residence permit, in order to avoid the employment of irregular citizens.

Any form of discrimination before or after the employee's employment is contrary to the spirit of this Code, even before to the law.

Italianpack S.p.a. encourages the continuous improvement of the professionalism of its employees and guarantees them an equal opportunity policy throughout their employment.

For these reasons, Italianpack S.p.a. is committed to creating a working environment that allows, for all those who interact with the Company at any title, conditions that respect personal dignity and in which the characteristics of individuals cannot give rise to discrimination or conditioning.

Employees must become familiar with and ensure that they are familiar with all internal practices and procedures, as well as with the provisions relating to their own sphere of responsibility and that of those subject to their control.

In the event of a conflict between national, state or local laws or regulations and this Code, employees are obliged to comply with the applicable law and regulations and must observe correct and transparent conduct in the performance of their functions, thus contributing to the effectiveness of the control system for the protection of the values of the Company.

The Company bases the selection, remuneration and training policies of its employees on criteria of professionalism, competence and merit. It rejects any form of discrimination or pressure of any nature or origin aimed at favouring the recruitment or assignment of positions.

Similarly, the Company expects its directors, employees, collaborators and Recipients in general to act impartially, avoiding any unequal treatment, and to endeavour to maintain an internal climate that respects the dignity and personality of the individual.

The Company safeguards equal opportunities in personnel selection, which is the responsibility of the Human Resources Department, through objective assessments of the professional and psycho-aptitude profile, respecting the private sphere and avoiding any form of favouritism.

At the establishment of each employment relationship, the employee or collaborator receives accurate information on:

- characteristics of the function and tasks to be performed;
- procedures inherent to the company's Quality Management System;
- normative and retributive elements, as regulated by the National Collective Labour Agreement;
- rules and procedures to be adopted for health and safety in the workplace.

At the time of recruitment or promotion, the Company promotes the definition of roles, responsibilities, proxies and availability of information such as to enable each person to take the decisions within his or her authority in the interest of the Company.

It constitutes an abuse of the position of authority to request, as a due act of one's hierarchical superior, services, personal favours or any behaviour that constitutes a violation of this Code.

Within the organisation of work, the Company shall endeavour to distribute work activities as evenly as possible among all employees consistent with the effective and efficient operation of the Company; in the event of new or unforeseen events, which must in any case be made explicit, the collaborator may be

assigned to different tasks than previously performed, taking care to safeguard his or her professional skills.

6.5. CONFLICT OF INTEREST

The Recipient of this Code are required to avoid situations in which conflicts of interest may arise and to refrain from taking personal advantage of business opportunities of which they may become aware in the course of the performance of their duties.

By way of example but not limited to, the following situations may give rise to conflicts of interest:

- performing a top-management function (managing director, shareholder, departmental manager) and having economic interests with suppliers, customers, or competitors (ownership of shares, professional assignments, etc.) also through family members;
- maintaining relations with suppliers and carrying out work, even by a family member, with suppliers;
- accepting money or favours from persons or companies that are or intend to enter into business relations with the Company.

In case of occurrence of even only an appearance of a conflict of interest, the employee or collaborator is required to notify the Human Resources Manager, who, in accordance with the procedures laid down, informs the Supervisory Body, which assesses the actual existence of such a conflict on a case-by-case basis. The collaborator is also required to give information on the activities performed outside working hours, if these may appear to be in conflict of interest with the Company.

6.6. CORPORATE ASSETS AND IT SECURITY

Each Recipient is required to act with diligence to protect corporate assets, through responsible conduct and in accordance with the operating procedures established to regulate their use, accurately documenting their use, scrupulously and sparingly using the assets entrusted to him or her, and avoiding improper uses of corporate assets that may cause damage or a reduction in efficiency, or in any case in conflict with the interests of Italianpack S.p.a.

For the purposes of this principle, corporate resources are defined as:

- capital goods and consumables owned by the Company;
- computer applications and devices for which strict compliance with the company's security policies is required in order not to compromise the functionality, processing capacity and integrity of data.

With regard to computer applications, each employee is required:

- to scrupulously adopt the company's security policies so as not to compromise the functionality and protection of IT systems;
- not to send threatening and insulting e-mail messages, not to use low-level language, not to make inappropriate comments that may cause offence to the individual and/or damage the company image;
- not to surf on websites with indecorous and/or offensive contents;
- not to install software on electronic devices in an autonomous way, but always to contact the authorised person in charge;
- not to use the computers provided for purposes other than work-related purposes.

6.7. PRIVACY PROTECTION

The Company is committed to protecting the privacy of information concerning the private sphere and opinions of each of its employees and collaborators and, more generally, of those who interact with it.

In particular, the respect for the worker's dignity must also be ensured through respect for privacy in correspondence and interpersonal relations between employees, through the prohibition of interferences in conversations or dialogues and through the prohibition of intrusions or forms of control that could harm the personality.

The privacy of employees and collaborators is protected by adopting standards and methods for the processing and storage of data and information referring to them, in full compliance with the provisions of the GDPR (General Data Protection Regulation) as well as Legislative Decree 196/2003 as amended by Legislative Decree 101/2018.

Any investigation into the ideas, preferences, personal tastes and in general the private life of employees and collaborators is excluded.

It is prohibited, except in cases provided for by law, to communicate or disseminate personal data without the prior consent of the person concerned.

6.8. EXTERNAL COMMUNICATIONS AND MARKETING

Consistently with the principles of transparency and completeness of information, the communications of Italianpack S.p.a., addressed to the public, concerning the Company itself as well as the contents provided by customers, are based on the respect for the right to information.

In the belief that business activity and results must be closely linked to responsible business conduct, the external communication, including that aimed at promoting the Company's image, respects the ethical principles of this Code.

Relations with the press, communication and information media and, more generally, external interlocutors, must only be maintained by persons expressly delegated to do so, in compliance with the rules adopted by the Company. Any request for news from the press or from communications and information media received by the personnel of the Company must be communicated to the persons in charge of external communication, before undertaking any commitment to respond to the request.

External communication must follow the guiding principles of truthfulness, fairness, transparency, prudence and must be aimed at favouring awareness of corporate policies and programmes and projects of the Company.

6.9. HANDLING OF CONFIDENTIAL AND/OR INSIDE INFORMATION

Directors, employees and collaborators shall take special care not to disclose inside information and to avoid any improper use of such information.

All those who work in any guise on behalf of the Company are required to maintain the utmost confidentiality on documents, know-how, research projects, company operations and, in general, on all information concerning the Company that they learn in the course of their work.

6.10. ADMINISTRATIVE AND ACCOUNTING MANAGEMENT

The Company complies with laws and, in particular, applicable regulations concerning the preparation of Financial Statements and all types of mandatory administrative and accounting documentation.

The accounts are based on generally accepted accounting principles and systematically record the events arising from the management of the Company.

All actions and operations of the Company must be correctly recorded, authorised, verifiable, legitimate, coherent and adequate.

All corporate functions are obliged to give their utmost cooperation to ensure that management facts are correctly and promptly represented in the company accounts.

Employees and internal and external collaborators - the latter insofar as they are authorised to do so – upon becoming aware of omissions, falsifications, negligence in accounting records or supporting documents, are obliged to report them promptly to their hierarchical superior or other contact persons designated for that purpose.

Transfers of funds, in particular, require enhanced verification with regard to the recipient and the reason for the transfer.

Adequate supporting documentation must be maintained for each recognition in the accounts reflecting a corporate transaction. This documentation must make it possible to identify the reason for the transaction that generated the recognition and the relevant authorisation. Supporting documentation must be easily available and filed according to appropriate criteria that allow an easy consultation by both internal and external control bodies.

6.11. ANTI-MONEY LAUNDERING

Italianpack S.p.a. must not, in any way and under any circumstances, be implicated in events linked to money laundering deriving from unlawful and criminal activities. Before establishing relations or entering into contracts with collaborators or third parties, employees must ensure the reputation and good name of the counterparty. The Company undertakes to comply with all national and international rules and regulations on money laundering.

7. PREVENTION, DISSEMINATION OF THE CODE AND SUPERVISION OF ITS APPLICATION

7.1. PREVENTION

In compliance with the regulations in force and with a view to planning and managing corporate activities aimed at efficiency, fairness, transparency and quality, appropriate organisational and management measures are adopted to prevent a conduct that is unlawful or in any case contrary to the principles of this Code by persons acting in the interest of Italianpack S.p.a.

7.2. DISSEMINATION

This Code is made known to all Recipients by means of specific internal training activities and is available to any external interlocutor by means of publication on the website and express reference in contracts concluded with third parties.

Each employee and collaborator conforms his or her activities to the principles and criteria of conduct contained in this Code, which he or she applies with a sense of honesty, integrity and reasonableness. Should doubts or uncertainties arise as to the conduct to be followed in certain circumstances, based on the indications of the Code, the employee shall refer the matter to his or her superior or the Supervisory Body.

7.3. SUPERVISION OF THE CODE

Anyone who becomes aware of a fact, circumstance or conduct that violates this Code is required to promptly report it to his or her supervisor and/or the Supervisory Board. To this end, it should be noted that Italianpack S.p.a. has adopted, in accordance with the provisions of Legislative Decree 231/2001 and Legislative Decree 24/2023, specific Whistleblowing Procedures, to which reference should be made in full.

In any case, a report is always allowed in favor of the Administrative Body, which will immediately ascertain and verify the violation of the Code of Ethics and dispense any disciplinary sanctions, in accordance with the provisions of the General Part of the Model of Organisation, Management and Control, adopted by the Company, pursuant to and for the purposes of Legislative Decree 231/2001.

The Administrative Body and the Supervisory Board shall ensure that those who have made reports are not subjected to retaliation, discrimination or penalisation, thus ensuring the appropriate confidentiality of such individuals (except for the occurrence of any legal obligations that otherwise require).

8. UPDATING AND DEROGATIONS

8.1. UPDATING

By resolution of the Board of Directors, this Code may be subject to amendments and supplements, also on the basis of suggestions and indications from the Supervisory Body, without prejudice to the methods of dissemination, described above.

8.2. DEROGATIONS

Derogations from any of these rules of conduct may only be authorised, only in special circumstances, by the Administrative Body or an appropriate level of management.

In any case, these derogations must be communicated to the Supervisory Board, so that it can assess their appropriateness and potential violations of the principles expressed in Model 231, adopted by the Company.