

**LAMEPLAST S.r.l.**

# **CODE OF ETHICS**

## CODE OF ETHICS AND SUPERVISORY BOARD

This Code of Ethics is the instrument prepared by LAMEPLAST S.r.l. (hereinafter also “Company”) to define the set of corporate values that the Company recognises, accepts, and shares, and the set of responsibilities that LAMEPLAST and its personnel assume in internal and external relations.

LAMEPLAST S.r.l. recognises the importance of ethical-social responsibility, of the quality of its products, of protection of the environment, and of the health and safety of workers in carrying out the Company's business and operating activities, and it therefore promotes a form of governance aimed at balancing the legitimate interests of its stakeholders and of the community in which it works. The Code is therefore inspired by a vision of cooperation and respect for all stakeholder interests.

The stakeholders of LAMEPLAST S.r.l. are its human resources (employees and collaborators), customers, shareholders, vendors, the public administration, the community and, more broadly, all the parties directly and/or indirectly involved in the Company's activities.

In the context of the internal control system, the Code of Ethics constitutes (pursuant to articles 6 and 7 of Italian legislative decree 231 of 2001 and the “*Guidelines for construction of organisational, management and control models ex Italian legislative decree 231/01*” issued by Confindustria on 7 March 2002, as amended, with ministerial approval on 2 April 2008 and, finally, amended during 2014; and also in consideration of the “Consolidated principles for the preparation of organisational models and the activity of the supervisory board and prospects for the revision of legislative decree no. 231 of 8 June 2001”, approved in 2019), among other aspects, the premise and reference of the Organisational, management and control model of LAMEPLAST S.r.l. (hereinafter the “Model”) and of the system of penalties set down therein.

Checking implementation of the Code of Ethics and its effective application is the responsibility of the administrative body of LAMEPLAST S.r.l. and of the company management, which can also make proposals for integration or amendment of the contents. It is the responsibility of the administrative body to update the Code of Ethics to bring it into line with possible new legislation and standards and the evolution of civic awareness.

In relation to the offences regulated by Italian legislative decree 231/01 in particular, a Supervisory Board is formed (hereinafter also SB) to check operation and observance of the Model for prevention of the offences in question. The Supervisory Board can access all the Company's information sources, is entitled to view documents and consult data, and proposes possible updates to the Code of Ethics and to the Model, based also on feedback received from employees. In order

to guarantee enforcement of the Model and in compliance with data protection requirements and the rights of data subjects, LAMEPLAST provides communication channels whereby whosoever becomes aware of any illicit conduct within the Company, or of any critical aspects of the Model, can freely report the matter, in a confidential manner, directly to the Supervisory Board.

## **LAMEPLAST S.r.l.'s MISSION AND ETHICAL VISION**

LAMEPLAST S.r.l. is a corporation in the form of a limited company. The company is currently administrated by a Board of Directors. The fully paid-up share capital stands at EUR 1,000,000.00. The sole proprietor is TEKNIPLEX EUROPE NV (controlling company).

LAMEPLAST S.r.l. has been operating in the manufacture of single-dose and multi-dose plastic packaging for the pharmaceutical and cosmetic industry since 1976. Today, the company operates with a workforce of approximately 150 in its Rovereto sulla Secchia factory and is a key player in the production of primary containers and in the supply of filling machines.

The Company specialises in offering a consultancy/production service that makes it possible to obtain a product that is perfectly aligned with the specific requirements of its customers, developing the necessary know-how over the years to meet all customer needs with innovative and customised solutions. A bespoke service, based on a tailor-made philosophy, that covers each stage of the production process thanks to the collaboration of strategic partners. Since the 1970s, pharmaceutical packaging has been the core vocation of the company, which invented single-dose plastic containers for the ophthalmic sector and went on to differentiate not only the containers, but also the applicators, adapting them to meet customers' needs and creating new concepts and customised containers.

Today, LAMEPLAST S.r.l. can offer an ever more comprehensive service, supplying its customers directly with the concept, the plastic containers, and the filling machines, thanks to a high level of flexibility that makes it possible to offer solutions for the broadest possible range of needs. In this sense, the Company also provides advisory services for the development of filling lines for single-dose containers, including for customised containers developed to match the customer's specific requirements.

LAMEPLAST S.r.l. is committed to guaranteeing high quality standards for every one of its products, through the discerning choice of materials, sourced from carefully selected vendors able to guarantee the origin of raw materials.

Also, in order to ensure the highest possible level of customer satisfaction, LAMEPLAST S.r.l. uses exclusively vendors selected by means of vetting procedures inspired by the principles of

transparency and the primacy of consumer interests.

A list of vendors is kept on file at the Company's headquarters and reviewed and updated periodically in relation to the product quality certifications held by the company.

The Company's ethical vision is inextricably linked to several basic principles:

- operate in compliance with precepts of quality and defects and loss prevention, such as to supply safe and guaranteed products and services with unvarying characteristics;
- rationalise company management in all its areas;
- recognise the essential role of training and engagement of all personnel (who, in application of this principle, are constantly provided with training and refresher programmes);
- integrate, within the goals of effectiveness and efficiency, the principles of sustainable and eco-compatible development and prevention of occupational injuries, as the essential prerequisites of a responsible and enduring presence on the market.

## **RECIPIENTS AND SCOPE OF APPLICATION OF THE CODE OF ETHICS**

The Code of Ethics is addressed to the Company's Board of Directors, employees, and collaborators, and all those who, directly or indirectly enter into relations with LAMEPLAST S.r.l. on a temporary or enduring basis. These persons undertake to comply with the provisions of this Code of Ethics at the time of acceptance of their position, or when they sign their work contract or, anyway, from the start of their collaboration with the Company and for the entire period in which they perform their activities at, or in the interest of, the Company.

In view of this undertaking, LAMEPLAST promotes the widest possible diffusion of the Code among all stakeholders, ensuring that its contents are correctly interpreted and supplying the most suitable tools to enable its application.

The Company also takes the necessary measures in order to verify and monitor application of the Code. A Supervisory Board has been formed for this purpose, with responsibilities that include oversight of the application of the Code of Ethics.

## **REFERENCE PRINCIPLES**

### ***Respect for the Law***

Compliance with laws, transparency and integrity of governance, and trust and cooperation with stakeholders are the ethical principles inspiring LAMEPLAST S.r.l. and those on which its models of conduct are based, in order to pursue effective and fair competition on the market,

maximise the level of satisfaction of its customers, build value for shareholders and develop the skills and careers of its human resources.

For this purpose, LAMEPLAST S.r.l. requires that its shareholders, directors, and employees in general (also in the case of changes in the corporate structure), and all those who, in any capacity, carry out functions of representation, also de facto, act in compliance with legislation and all the relevant standards in force and with the principles and procedures preordained for this purpose, and pursue correct ethical conduct, such as to uphold the Company's moral and professional integrity.

LAMEPLAST S.r.l. also complies with and respects the additional obligations arising from contractual requirements and industry norms.

### ***Honesty***

Honesty is the fundamental principle for all the activities of LAMEPLAST S.r.l., its initiatives, its reporting, and its communications, and it constitutes an essential aspect of its governance.

Relations with stakeholders are inspired by criteria of integrity, collaboration, loyalty, and reciprocal respect.

### ***Transparency and completeness of information***

LAMEPLAST S.r.l. recognises the fundamental value of supplying correct information to shareholders, corporate bodies, and competent bodies and functions, in relation to significant events concerning corporate governance, company management, and accounting operations.

### ***Fairness in corporate governance and in the use of resources***

LAMEPLAST S.r.l. pursues its corporate purpose in compliance with the law, its bylaws and its internal regulations, ensuring correct operation of the corporate bodies and protection of the proprietary and equity participation rights of its shareholders, safeguarding the company's capital and assets.

### ***Confidentiality of information***

LAMEPLAST S.r.l. keeps the information it holds confidential and does not attempt to source confidential data using illegal means.

LAMEPLAST S.r.l. also complies with the applicable data protection regulations as per Regulation (EU) 679/2016 (GDPR). Specifically, the Company undertakes to formalise – in a separate document annexed to the Model – the procedures for collection, retention, and

management of personal data in compliance with the new principles of data protection by design and by default, in a general assumption of responsibility by the controller. This commitment is also applicable, a priori, for matters concerning the health data of employees, vendors, customers and stakeholders in general, as acquired by LAMEPLAST S.r.l. due to the procedures implemented to prevent the contagion and spread of Covid-19.

All information at the disposal of LAMEPLAST S.r.l. is anyway treated in compliance with the requirements of confidentiality and privacy of data subjects.

In the context of the various relations with the company or with its stakeholders, the recipients of this Code must refrain from using confidential information not in the public domain, of which they are informed due to reasons of their office and/or profession, for personal purposes and purposes anyway not connected with the work or professional activities entrusted to them or performed within the Company.

### ***Respect for the individual***

The Company promotes respect for the physical and cultural integrity of the individual and respect of the sphere of relations with others.

It guarantees working conditions compatible with personal dignity and safe workplaces, applying the legislation and collective bargaining agreements in force to its workforce and rejecting all modern slavery related practices in its policies.

The Company has embraced the principles of European Commission Recommendation 93/131/EEC of 27 November 1991 in drafting this Code of Ethics. Likewise, LAMEPLAST also adopts the principles enshrined in the ILO Conventions and Recommendations<sup>1</sup>.

### ***Prevention of conflicts of interest***

LAMEPLAST S.r.l. discourages situations of even potential conflict of interest. The human resources manager must be notified of any situations of potential conflict of interest in order to

---

<sup>1</sup> ILO Convention 1 (Hours of Work - Industry) and Recommendation 116 (Reduction of hours of work); ILO Conventions 29 (Forced labour) and 105 (Abolition of forced labour); ILO Convention 87 (Freedom of association and protection of the right to organise); ILO Convention 98 (Right to organise and collective bargaining); ILO Conventions 100 (Equal remuneration) and 111 (Discrimination – employment and occupation); ILO Convention 102 (Social security – minimum standards); ILO Convention 131 (Minimum wage fixing); ILO Convention 135 (Workers' representatives); ILO Convention 138 and Recommendation 146 (Minimum age); ILO Convention 155 and Recommendation 164 (Occupational health and safety); ILO Convention 159 (Vocational rehabilitation and employment - disabled persons); ILO Convention 169 (Indigenous and tribal peoples); ILO Convention 177 (Home work); ILO Convention 181 (Private employment agencies); ILO Convention 182 (Worst forms of child labour); ILO Convention 183 (Maternity protection); ILO Code of conduct on HIV / AIDS and the world of work; Universal Declaration of Human Rights; International covenant on economic, social and cultural rights; International covenant on civil and political rights; United Nations Convention on the rights of the child; United Nations Convention on the elimination of all forms of discrimination against women; United Nations Convention on the elimination of all forms of racial discrimination; United Nations Guiding Principles on Business and Human Rights.

proceed with a comprehensive assessment of the situation.

***Protection of the environment, safety, and sustainable development***

The environment is a primary resource that LAMEPLAST safeguards, in compliance with the principles of sustainable development and also in accordance with environmental legislation (including the code on the environment, Italian legislative decree 152/2006).

For this purpose, the Company plans its activities seeking a continuous balance between economic initiatives and social and environmental requirements and disseminates a culture of safety and risk prevention among all its stakeholders.

Although the Company does not handle hazardous waste and presents no particular risks in relation to environmental protection, it has secured a single environmental authorisation (*Autorizzazione Unica Ambientale AUA*) concerning the environmental sectors of air and noise, as per the table hereunder.

<b>Environmental sector concerned</b>	<b>Environmental title</b>
<b>Air</b>	Authorisation of atmospheric emissions for factories pursuant to article 269 of Italian legislative decree 152/06
<b>Noise</b>	Communication or authorisation pursuant to art.8, paras. 4 – 6 of Italian law 447/95;

<b>Settore ambientale interessato</b>	<b>Titolo ambientale</b>
<b>Aria</b>	Autorizzazione alle emissioni in atmosfera per gli stabilimenti di cui all'articolo 269 del D.Lgs 152/06
<b>Rumore</b>	Comunicazione o nulla osta di cui all'art. 8, commi 4 - 6, della L. 447/95;

***Protection of consumers and users of the Company's products***

LAMEPLAST S.r.l. deems it to be of critical importance to guarantee the highest quality standards for the final recipients of its products.

With this aim, the Company defines and regulates, with the utmost attention, all procurement stages of the materials used in the manufacturing process, by means of careful selection of vendors, a list of which is held in the Company and periodically updated in relation to the matters set down in the product quality certifications.

**RULES OF CONDUCT**

***Shareholders***

LAMEPLAST S.r.l. creates the necessary conditions to ensure that participation of shareholders (single shareholder at present) in the resolutions for which they are responsible is widespread and informed, promotes equal access to and completeness of information, and protects their interests.

The corporate governance system adopted by the company complies with the matters set down in law and is mainly intended to:

- create the utmost transparency in relation to the company stakeholders;
- control risks;
- provide a response to the legitimate expectations of shareholders;
- avoid any type of prejudicial action of creditors.

### ***Company information***

LAMEPLAST S.r.l. guarantees bookkeeping, formation, and drafting of the annual financial statements, reports, schedules, company communications in general, and all other matters required for its operation, in compliance with the legal provisions, principles, and technical standards in force.

For this purpose, the Company monitors the functioning of the administrative body, of the company officers, or of the persons subject to their supervision involved, in any capacity, in activities of formation of the accounts, of the financial statements, or of other similar documents.

LAMEPLAST S.r.l. ensures correct and timely information is supplied to all the bodies and functions involved in drawing up the financial statements, the annual financial report, reports, schedules, and company communications in general, and in all other matters required for its operation, in compliance with the legal provisions, principles, and technical standards in force. The Company also establishes the correct collaboration between the foregoing bodies and the corporate functions and facilitates checking activities by the competent bodies and functions.

Each operation and transaction is correctly authorised, performed, recorded, and tracked in order to allow easy traceability, accurate accounting records, identification of the various levels of responsibility, and accurate reconstruction of the operation, also to reduce the risk of misinterpretation.

### ***Human resources***

LAMEPLAST S.r.l. recognises the centrality of its human resources, the importance of their mental and physical health, and of establishing and maintaining relationships based on loyalty and reciprocal trust. In this sense, the expression human resources includes employees and also collaborators who work for the company under contractual agreements other than employment

contracts.

All employees/collaborators undertake to act loyally in order to respect the obligations assumed in the employment contract and the matters set down in this Code of Ethics, providing the work required of them and complying with the commitments assumed.

*Selection of personnel and establishment of the work relationship.*

The assessment of personnel to hire is carried out according to the correspondence between the profile of candidates and the profiles being sought and the requirements of the company (minimum requirements), in compliance with the principles of impartiality and equal opportunities for all interested parties.

All personnel are hired with formal contracts; no forms of unregulated or off the books work relationships are permitted.

As soon as the collaboration starts, also in the case of internships, the employee/collaborator will receive comprehensive information concerning the characteristics of the duties and functions, remuneration aspects, and the rules and behaviours for management of risks connected to personal health. The employee/collaborator is also adequately trained in relation to the type of work duties he/she is required to perform.

Note that the company carries out stringent checks, as required by the Group, to ensure that none of the persons considered for hiring appears in the FDA Debarment List (USA).

*Human resource management policies.*

All forms of discrimination against the individual are prohibited.

All decisions made in relation to management and development of human resources are based on considerations of merit and/or correspondence between the profiles being sought and the profiles of the personnel concerned. The same approach applies in relation to access to different roles or offices.

In the management of hierarchical relationships, authority is exercised in an equitable and fair manner, avoiding all forms of abuse. It is an abuse of authority to make requests, implying that compliance is due to a hierarchical superior, for personal services, favours, or any conduct that violates this Code of Ethics.

The value of human resources is fully developed by means of the levers available to aid their growth and development.

The competent functions must therefore:

- select, recruit, hire, train, remunerate, and manage employees or collaborators without any form of

discrimination;

- create a workplace in which personal characteristics cannot give rise to discrimination;
- adopt criteria of merit, competence, and anyway of a strictly professional nature for any decision connected to employees or collaborators.

### ***Health, safety, and the environment***

LAMEPLAST S.r.l. promotes and diffuses a culture of occupational safety and environmental protection, developing awareness of risk management, promoting responsible conduct and protecting, especially by means of preventive actions, the health and safety of all employees and collaborators, the hygiene of the workplaces, and respect for the environment in all its aspects.

All persons working in LAMEPLAST S.r.l. (shareholders, executives, employees, and collaborators) must comply scrupulously with the rules and obligations deriving from the reference legislation in relation to health, safety, hygiene of the workplace, and protection of the environment, and the adoption of and full respect for all the health, safety, and environmental measures and procedures required by the safety assessment system, by environmental protection considerations, and by the internal regulations.

LAMEPLAST S.r.l. has also implemented a specific protocol, to be considered as annexed to the Model, concerning the Company social distancing policies, in compliance with the “Joint regulatory protocol of the measures to combat and contain the spread of the Covid-19 virus in the workplace”, signed by the Government and social partners in March 2020 and subsequent amendments and integrations thereto.

### ***Management of information and data protection***

Personal data of employees and collaborators are protected in compliance with the reference legislation, which is now harmonised with the European General Data Protection Regulation, also by means of operating standards that specify the information received and the associated methods of processing and retention. No investigations are carried out in relation to the personal ideas, preferences, tastes, and the private lives of data subjects.

In order to guarantee integrity, confidentiality and availability of information, employees/collaborators must be familiar with and implement the Company's information security policies.

Each employee/collaborator is under an obligation to observe the confidentiality required by circumstances in relation to all information that comes to their attention due to their work activities.

### ***Conflicts of interest***

All employees/collaborators of LAMEPLAST S.r.l. must avoid any situations or activities that could constitute a conflict with the interests of the Company or that could interfere with their ability to make impartial decisions in the best interest of the Company and in full respect for the rules of the Code of Ethics. They must likewise refrain from securing personal benefits arising from acts of disposition of company assets or from business opportunities that come to their attention during their work activities.

LAMEPLAST S.r.l. recognises and respects the right of its employees and collaborators to make investments, conduct business affairs, or engage in activities of other types other than those carried out in the interest of the Company, on the condition that such activities are lawful and contractually permitted, and compatible with the obligations assumed in the role of employee or collaborator.

Any situations that could constitute or produce a conflict of interest must be notified to the human resources manager so that the situation can be assessed in full. Specifically, all LAMEPLAST S.r.l. employees and collaborators must avoid conflicts of interest between personal and family economic activities and the positions they hold in the Company. By way of example, situations that give rise to a conflict of interest include, without limitation:

- performing senior management functions (administrative body, director, function head) and holding economic and financial interests in the suppliers, customers, competitors, or commercial partners of LAMEPLAST S.r.l.;
- using a position in the Company or the information acquired in a professional capacity in such a way as to create a conflict between personal interests and the Company's interests;
- carrying out any type of work activity for customers, suppliers, and/or competitors;
- accepting or offering cash, favours, or utilities from/to individuals or companies that have, or are seeking to enter into, a business relationship with LAMEPLAST S.r.l.

If even the appearance of a conflict of interest emerges, the member of staff in question must inform his/her superior and/or the Supervisory Board.

### ***Use and protection of the Company's tangible and intangible assets***

Every employee/collaborator must proceed with due care and diligence to safeguard the Company's property by acting responsibly and in compliance with the operating procedures established governing use of Company property and documenting the use of individual assets whenever appropriate.

Every employee/collaborator is responsible for the resources entrusted to them, including PPE

(also for health protection), and must promptly inform the relevant functions concerning possible threats or harmful effects for the Company or for its property.

Specifically:

- every employee/collaborator must avoid improper uses that could give rise to unnecessary costs, damage, or reductions in efficiency or that are anyway in contrast with the Company's interests;
- every employee/collaborator must scrupulously adopt all the prescriptions of the internal policies and procedures in order to avoid impairing the functional efficiency, protection, and security of the Company's information systems, equipment, and plants;
- every employee/collaborator must work in compliance with the safety regulations required by law and by the internal procedures at all times, in order to avoid possible harm to property, people, or the environment;
- every employee/collaborator must use the Company's property of any type and value in compliance with the law and the internal regulations;
- all the Company's assets must be used exclusively for purposes connected to and instrumental in the exercise of the operating activity and, in any case, use or transfer of the assets by/to third parties is prohibited, even on a temporary basis, except in the presence of specific contrary provisions;
- every employee/collaborator is required do all in their power to reduce the risk of theft, damage, and other threats to the assets and resources assigned or present, informing the responsible functions promptly in the presence of anomalous situations (whistleblowing form).

Every employee/collaborator must be informed of the rules set down in the Code of Ethics and the reference standards that regulate the activity performed in the context of their professional role deriving from the law, from procedures required by the safety assessment and environmental protection system, or from internal and industry regulations.

Every employee/collaborator must also explicitly accept their obligations deriving from this Code of Ethics, at time of constitution of the work relationship or of the initial diffusion of the Code.

In particular, employees/collaborators must:

- abstain from conduct that is in conflict with the rules set down in the Code;
- turn to their superiors, company contacts, or the Supervisory Board for requests for clarifications concerning the methods of application of the Code;
- promptly inform their superiors, company contacts, or the Supervisory Board of any first-hand information or information received from third parties, concerning possible violations of the Code and any requests they have received to violate it;
- collaborate with the functions delegated to investigate any possible code violations;

- adequately inform all third parties with whom they come into contact in the context of their work activity concerning the existence of the Code and the commitments and obligations it imposes in relation to external entities;
- insist on compliance with the obligations that directly concern their activity;
- adopt suitable internal initiatives and, as far as competent, external initiatives in the case of failure by third parties to act in compliance with the prescriptions of the Code.

### ***Customers and Vendors***

The Company's style of conduct in relation to its customers and vendors is inspired by the principles of flexibility, respect, and courtesy, in the pursuit of a collaborative relationship and the utmost professionalism.

LAMEPLAST S.r.l. pursues its mission through the offering of high quality services at competitive conditions and in accordance with all the rules designed to ensure fair competition.

It is mandatory for the Company's employees and collaborators to:

- supply, in an efficient, courteous, and rapid manner, within the limits of the contractual clauses, high quality services that meet the reasonable expectations and needs of the customer;
- supply, wherever necessary, in the manner and in the form required by the company policies, accurate and exhaustive information concerning the Company's products and services, to allow customers to make informed decisions;
- be truthful in advertising messages and communications of other types.

A correct and transparent relationship with customers and vendors is a significant aspect of the Company's success.

Selection of vendors and determination of the purchase conditions are based on objective parameters including – first and foremost – quality, convenience, price, capacity, and efficiency.

The following are therefore the reference requirements of LAMEPLAST S.r.l.:

- professionalism of the counterparty;
- appropriately documented availability of means, also financial, organisational structures, planning capabilities and resources, know-how etc.;
- the existence and effective implementation of quality, safety, and environmental systems.

In relationships of tender, procurement, and in the supply of goods and services in general, LAMEPLAST S.r.l.:

- adopts the assessment criteria set down by the existing procedures, in an objective and transparent manner;
- does not prevent anyone in possession of the specified prerequisites from competing for contracts

and adopts objective and documentable criteria when choosing the shortlist of candidates;

- observes the specified contractual conditions;
- maintains a candid and open dialogue with suppliers, in line with best commercial practices.

In business relations with customers and vendors, gifts, benefits (both direct and indirect), gratuities, acts of courtesy and of hospitality, are prohibited unless they are of a nature and value such as to not jeopardise the good reputation of the Company and such that they cannot be construed as aimed at obtaining favourable treatment that is not in line with the market rules. In any case, any gratuities, acts of courtesy and of hospitality that depart from normal practices must be communicated to and subjected to the approval of the administrative body.

Employees who receive gifts or favourable treatment from customers or vendors that exceed the ordinary practices of courtesy must immediately inform Management, which will conduct the appropriate checks and then adopt the necessary measures.

The acts of entering into contract with a vendor or a customer and managing contacts with said contractual counterparties must be based on relationships of extreme clarity, avoiding excessive levels of reciprocal dependency as far as possible.

To ensure the utmost transparency and efficiency of the procurement process, LAMEPLAST S.r.l. ensures:

- adequate traceability of the decisions made;
- retention of information and contractual documents for the periods established by statutory legislation.

With the aim of bringing goods and services procurement activities into line with the applicable ethical-environmental principles, the Company can demand social, environmental protection, and occupational safety credentials for certain supplies. To this end, individual contracts can be drawn up with specific clauses.

The Company maintains a register of customers and updates it periodically.

### ***Product quality.***

LAMEPLAST S.r.l. promotes and implements an efficient and constantly updated control system that allows it to provide customers with a guarantee of the quality of its products.

### ***Environment and safety***

LAMEPLAST S.r.l. awards a high level of materiality to topics connected to the environment and occupational safety.

For this purpose, in managing its operations the Company has set up procedures for the protection of occupational health and safety and environmental respect. The Company also pursues a strategy of ongoing improvement of the conditions of occupational health and safety and environmental respect.

Research and technological innovation are especially focused on the promotion of products, activities, and processes that are as compatible as possible with the environment and with the health and safety of operators.

In the context of their duties, employees/collaborators participate in the process of risk prevention, safeguarding of the environment and protection of health and safety in relation to themselves, their co-workers, and third parties.

In particular, LAMEPLAST S.r.l. pursues these goals also through the active collaboration of its employees/collaborators, by means of a company safety assessment system, and by complying with the contents of the Risk Assessment Document.

The Company:

- promotes and implements all reasonable initiatives aimed at minimising risks and at removing causes that could jeopardise personal health and safety and/or threaten the integrity of the environment in all its aspects;
- devotes continuous attention and commitment to improving its environmental performance, minimising negative impacts on the environment and working with an aware and responsible use of natural resources;
- evaluates the impacts on the environment and on the health and safety of workers of all new company activities and processes in advance;
- collaborates with its stakeholders, both internal (e.g. employees), and external (e.g. institutions), to optimise management of aspects concerning Health, Safety, and Environmental issues;
- maintains high standards of safety and environmental protection by implementing adequate management and monitoring systems, in compliance also with the aforementioned standards UNI EN ISO 9001:2015, and 15378/2017.

For this purpose, all employees/collaborators have successfully completed training and refresher courses on occupational health and safety, in compliance with the prescriptions of Italian legislative decree 81/2008. The associated qualifications and certificates of attendance in such courses are retained by the Company.

### ***Community***

LAMEPLAST S.r.l. is aware of the effects of its activity on the surrounding area and on the

economic and social development and general wellbeing of the community and pays attention in its operations to safeguarding the related interests.

In particular, LAMEPLAST S.r.l. undertakes to safeguard public health and the sanitary condition of workplaces, health of people and hygiene of products using the latest technological solutions and complying scrupulously with the procedures set down in law.

LAMEPLAST S.r.l. considers dialogue with stakeholders to be of strategic importance for correct development of its activity and it creates a permanent channel for dialogue with the associations representing its stakeholders wherever possible, in order to cooperate in the respect of reciprocal interests.

### ***Relations with political and trade union organisations***

LAMEPLAST S.r.l. abstains from making any form of direct or indirect contribution, in any form, to political parties, movements, committees, and political and union organisations, or to their representatives and candidates, other than those due in compliance with specific legal provisions.

### ***Relations with non-profit associations***

LAMEPLAST S.r.l. views favourably and, if appropriate, supports social and cultural initiatives oriented towards promotion of the individual and improvement of the quality of life.

### ***Relations with mass media and dissemination of information***

Relations with the press, communication and information media and, more generally, external stakeholders, must be maintained only by the persons specifically delegated for this function, in compliance with the procedures adopted by the Company.

Communications towards the exterior follow the guidelines of truthfulness, fairness, transparency, and prudence, and are aimed at promoting awareness of the Company's policies, programmes, and projects.

Media relations are inspired by these principles and are reserved exclusively for the functions and responsibilities specifically delegated for this purpose.

Employees/collaborators must not disclose information outside the Company, or undertake to disclose it, unless duly authorised by the competent functions.

Employees/collaborators must not offer payments, gifts, or other benefits in order to influence the professional activity of the exponents of mass media, or that could be reasonably interpreted as having this intention.

### ***Relations with the Public Administration***

Relations concerning the Company activities held with public officials or public service officers (who work on behalf of the Public Administration, central and peripheral, or of legislative bodies, EU institutions, public international organisations and of any foreign country), with the judiciary, with the public supervisory authorities and with other independent authorities, or with private concessionary agencies in charge of public services, must be conducted and managed in absolute and rigorous compliance with the laws and regulations in force, with the principles established in the Code of Ethics, and in the internal protocols of the Model, in such a way as to not jeopardise the integrity and reputation of either party. For this purpose, the assumption of commitments with the Public Administration and Public Institutions is reserved exclusively for the specifically delegated and authorised functions, which will proceed in full respect of the law and the principles of the Code of Ethics and in full compliance with the internal protocols set down in the Model.

LAMEPLAST S.r.l. prohibits its employees, collaborators, representatives, and more generally all those operating in its interest, in its name, or on its behalf, from promising or offering, also indirectly, cash, gifts, goods, services, or undue favours (also in terms of employment opportunities) concerning relations with public officials, public service officers, or employees, in general, of the Public Administration or of other Public Institutions, or private entities, to influence decisions in order to obtain more favourable conditions or undue benefits or for any other reason.

Any employee who receives, directly or indirectly, requests or offers of cash or favours of any type (including gratuities or gifts other than of symbolic value) made unduly to, or by, persons who operate on behalf of the Company in the context of relations with public officials, public service officers or employees in general of the Public Administration (Italian or of other countries) or of other Public Institutions, or with private parties (Italian or foreign), must immediately refer the matter to the Supervisory Board and to the administrative department responsible for taking the consequent measures.

All relations with Italian or international institutions are therefore based exclusively on forms of communication aimed at explaining the operations of the Company, responding to requests or acts of inspection (interrogations, interpolations), or anyway to disclose the Company's position in relation to topics of relevance.

For this purpose, LAMEPLAST S.r.l.:

- operates, without any form of discrimination, through the channels of communication provided for this purpose with its institutional counterparties;
- represents its interests and positions in a transparent, rigorous and consistent manner, avoiding

collusive attitudes;

- avoids any falsification and/or alteration of records or documentary data aimed at obtaining an undue advantage or any other benefit for the Company and avoids using public funds for purposes other than those for which they were obtained.

## **INTERNAL CONTROL SYSTEM AND METHOD OF IMPLEMENTATION OF THE CODE OF ETHICS**

### ***Internal control system***

It is the Company's policy to diffuse a culture characterised by awareness of the existence of controls and by the adoption of a mentality oriented towards the exercise of control. The attitude towards checking activities must be positive because of their contribution to improving efficiency. The term 'internal controls' refers to all the instruments necessary or useful to guide, manage and verify the Company's activities with the aim of ensuring respect for laws and procedures, protecting the Company's assets and the health and safety of people, managing the activities efficiently and providing accurate and complete accounting and financial data, protecting consumers, and guaranteeing the quality of the products placed on the market.

The internal control system overall must reasonably allow:

- respect for the procedures set down in the quality, safety, and environmental management systems;
- compliance with statutory legislation and the Code of Ethics;
- respect for the Company's strategies and policies;
- protection of the Company's tangible and intangible assets;
- effectiveness and efficiency of operating activities;
- reliability of internal and external financial, accounting, and operating information;
- effectiveness of the corporate responsibility policies adopted.

Responsibility for creating an effective internal control system is shared throughout all levels of the organisational structure; it follows that all personnel are responsible for the definition and correct operation of the control system within the sphere of their functional competence.

### **Code of Ethics Supervisory Board**

The Supervisory Board is responsible for supervising the Code of Ethics; in particular, the SB must (apart from the matters prescribed by the Model):

- monitor application of the Code of Ethics by the parties concerned, through the application of specific compliance programmes, and collecting any feedback provided by internal and external

stakeholders;

- periodically report to the administrative body on the results of the activity, flagging any violations of the Code of a significant magnitude;
- express opinions, when requested, concerning the review of the most significant policies and procedures, in order to guarantee consistency with the Code of Ethics;
- comply, when necessary, with the proposal for periodic review of the Code of Ethics.

Any person who has received criminal convictions or has been condemned with an irreversible and unappealable sentence shall not be eligible to participate in the SB.

### **Communication and training**

The Code of Ethics is communicated to all the internal and external stakeholders by means of dedicated actions such as, for example, consignment of the Code at the time of assumption of the office of director or manager, at the time of signing of the employment, representation, or collaboration contract, by displaying the Code of Ethics on specific company notice boards and on its digital portals (Intranet and Internet).

In order to assure correct comprehension of the Code of Ethics, the human resources manager prepares and carries out, based also on indications provided by the Supervisory Board in relation to the Code, a periodic communication/training plan (yearly or two-yearly) to promote awareness of the principles and ethical standards set down in the Code. Training initiatives can be differentiated in accordance with the role and responsibility of the collaborators.

### **Stakeholder reports**

The Company establishes communication channels to allow stakeholders to make disclosures concerning the Code or any violations of the Code (whistleblowing form).

Alternatively, all stakeholders may report any violation or suspected violation of the Code of Ethics in writing, also in anonymous form, to the Supervisory Board, which will analyse the report inviting, if necessary, the author and the person responsible for the alleged violation to provide further details. The Supervisory Board takes steps to ensure that whistleblowers are not subject to any acts of retaliation, meaning actions that may give rise to even the mere suspicion of forms of discrimination or penalisation. In addition, confidentiality of the identity of whistleblowers is guaranteed, except for disclosures required by law.

### **Violations of the Code of Ethics**

In case of a proven violation of the Code of Ethics, the Supervisory Board forwards the

associated report and any suggestions deemed necessary to the Administrative Body by means of the procedures that the Company adopts for reporting of all nonconformities (whistleblowing report), violations of this Code, of the Model, and of the procedures contained therein. If the violations in question concern the directors, the Supervisory Board will bring the report to the attention of the Shareholders' Meeting.

The competent functions, alerted by the aforementioned bodies, define the provisions to be adopted in accordance with the regulations in force, oversee the related implementation, and refer the result to the SB.

### **Guidelines of the penalty system**

Violation of the principles set down in the Code of Ethics and in the procedures contained in the internal protocols of the Model damages the relationship of trust between the Company and its directors, employees, consultants, collaborators in various roles, customers, vendors, commercial partners, and financial partners. Specifically, compliance with the provisions of this Code of Ethics and the procedures contained in the Model must be construed as an essential part of the contractual obligation of employees, ex art. 2104 of the Italian civil code; it therefore follows that violation of the provisions in question may constitute a breach of the obligations of the work relationship and/or professional misconduct pursuant to the procedures ex art. 7 of the Statute of Workers and the applicable collective bargaining agreement. Compliance with this Code of Ethics is an integral part of the contractual obligations assumed also by the other recipients (directors, representatives, vendors, etc.), with the consequence that any violation of the provisions contained herein or the procedures set down in the Model can be construed as a breach of contract, with all the relevant legal consequences, namely termination of the contract or the assignment awarded, and liability for compensation in relation to the associated damages.

Any such violation will thus be pursued resolutely and immediately by LAMEPLAST S.r.l., by applying the disciplinary measures provided for by the Model, in compliance with the prescriptions of art. 7 of the Statute of Workers and of the applicable collective bargaining agreements, in an adequate and proportional manner, without considering any criminal aspects of such conduct and without prejudice to the initiation of criminal proceedings in cases wherein the conduct constitutes a criminal offence.

The effects of violation of the Code of Ethics and the procedures contained in the Model must be seriously considered by all who entertain relations with LAMEPLAST S.r.l. under any title: for this purpose, the Company ensures the Code of Ethics and the internal procedures are disseminated and provides information on the penalties imposed in case of violation of the Code

and the penalty application procedures.

This Code of Ethics is adopted by the Administrative Body. Any changes and/or updates of the Code will be approved by the Administrative Body and promptly notified to the recipients.