



Cromaplast s.p.A.

AUTOMOTIVE EXTERIORS

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## Cromaplast Ethic Code



# CROMAPLAST S.p.A.

## Automotive Exteriors

### COMPANY ETHIC CODE

*REV.01 - Approved by the Sole Administrator of CROMAPLAST S.p.A. on 3 March 2021*

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# Cromaplast Ethic Code

## PREMISE

The Code of Ethics is a document with which CROMAPLAST S.p.A. expresses the values, principles of conduct, commitments and responsibilities that it assumes both internally and externally.

CROMAPLAST S.p.A. recognizes the importance of ethical-social responsibility and environmental protection in the conduct of the Company's business and activities and, To this end, it promotes a management of the Company geared to balancing the legitimate interests of its stakeholders and the community in which it operates. The Code is, therefore, marked by an ideal of respect for all the interests of the parties involved.

The Code also highlights the rights, duties and responsibilities of all Recipients.

The Code is an integral part of the CROMAPLAST S.p.A. Model The ethical principles set out in this Code of Ethics are relevant for the prevention of crimes ex D. Lgs. 231/2001 and constitute an essential element of the preventive control system.

CROMAPLAST S.p.A. maintains the Code of Ethics and Conduct at the disposal of the Recipients.

## Definitions

The Company: CROMAPLAST S.p.A. with registered office in Valdagno, Via Gasdotto n.37, (VI).

Decree: D.Lgs. 8 June 2001, n. 231 in the matter of Administrative Responsibility of Entities.

Code of Ethics: this Code of Ethics, adopted by CROMAPLAST S.p.A.

Model: the Organization, Management and Control Model adopted pursuant to Legislative Decree no. 231/2001 by CROMAPLAST S.p.A.

Odv or Body: the Supervisory Body ex D.Lgs. n. 231/2001 appointed by CROMAPLAST S.p.A.

Corporate Management: Board of Directors and CEO of CROMAPLAST S.p.A.

Recipients: all those who act, work and collaborate, permanently or temporarily, in any way with CROMAPLAST S.p.A. (employees, consultants, associates, directors, collaborators, suppliers and third parties in general) and that they are faced with situations that require the adoption of behaviors relevant in different respects, including, the most important, ethical and legal.

## ETHICAL VISION

CROMAPLAST S.p.A. has set the priority objective of its activity in achieving the highest standards of quality and reliability for products and services provided.

The following factors make it possible to achieve this objective:

- clear strategic vision;
- secure financial balance;
- many years of experience;



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- constant search for innovation;
- customer service vocation.
- CROMAPLAST S.p.A. works for the continuous improvement of processes, inspired by some fundamental values:
- operate according to the principles of maximum satisfaction of customer expectations;
- manage the relationship with the customer with maximum clarity and transparency, offering all the necessary technical, commercial and financial information, and ensuring continuous and prompt assistance;
- to inform its internal and external activities with the utmost respect for the human person, in the conviction that ethics in the management of safety at work and in environmental protection should be pursued together with the success of the enterprise;
- recognise a strategic role for human resources by maintaining mutual respect and rejection of any form of discrimination based on age, sex, sexuality, health status, race, nationality, political opinions or religious beliefs;
- recognize an indispensable role in training, empowerment and involvement at all levels of all staff, while ensuring respect for physical and moral integrity
- rationalise business management in all its areas;
- operate in the market in compliance with certain fundamental ethical principles, such as honesty, impartiality and compliance with all existing rules and regulations (national and Community laws, internal regulations or codes, administrative measures, ethical standards) by undertaking not to enter into or continue any relationship with anyone who does not wish to comply with this principle.

### CONDITIONS AND PURPOSE OF THE CODE

#### WHAT IS THE ETHIC CODE FOR?

The purpose of this Code of Ethics is to provide general ethical behavioral guidelines to comply with in the execution of their activities, as well as to help prevent the implementation of administrative offences dependent on the offences provided for by the Decree.

#### TO WHOM IS THE CODE OF ETHICS ADDRESSED?

In carrying out their services, all those who act, operate and collaborate in any way with CROMAPLAST S.p.A. (employees, consultants, suppliers and third parties in general) and that are faced with situations that require the adoption of behaviors relevant in several respects, including, the most important, the ethical and legal (c.d. "Recipients" of the Code).

The principles and rules contained in the Code apply:

- a) to all employees of the Company, regardless of their role and function;
- b) the members of the various corporate bodies;
- c) to any third party that may act on behalf of CROMAPLAST S.p.A.;
- d) third parties that have relationships with CROMAPLAST S.p.A., such as, for example, suppliers, commercial partners and contractual counterparties with which the Company conducts negotiations or enters into agreements in any way.



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## WHAT DO YOU EXPECT FROM YOUR EMPLOYEERS AND PARTNER?

All the Addressees of this Code, as identified above, have the duty to maintain and make their collaborators and interlocutors behave in accordance with the values identified by the Company, as well as the specific obligations that may derive from the deontology and, in any case, from those principles deemed due by virtue of the context and purpose of its mission.

In the presence or absence of specific provisions, however, it is absolutely necessary that in their actions all are inspired by the highest standards of conduct, to which the Company in turn uniforms its conduct.

The Company does not intend to maintain relations with subjects who are not committed to respect the values and principles and rules contained in this Code.

To this end, CROMAPLAST S.p.A. provides for the insertion in the contracts with these subjects clauses for the respect of this Code.

In no way can the conviction to act in the interest or for the benefit of the Company justify the adoption of conduct contrary to the principles and values indicated in this Code.

These obligations, in particular for the Company's employees, supplement the provisions of Articles 2104 and 2105 of the Civil Code and of the National Collective Labour Agreement applicable and in force.

This Code is an integral part of the Organization, Management and Control Model adopted by the Company pursuant to Legislative Decree no. 231/2001.

## VALUES

### Honesty

Honesty is the fundamental principle for all the activities of CROMAPLAST S.p.A., its initiatives, its reports, its communications, and is an essential element of the management and operation of its human resources. Relations with stakeholders are based on criteria and behaviours of fairness, collaboration, loyalty and mutual respect. For this reason, any form of benefit or gift, received or offered, that can be understood as a means to influence the independence of judgment and conduct of the parties involved is refused.

### Transparency

The achievement of the objectives, as well as the internal and external communication directed to all stakeholders are marked by maximum transparency, so as to allow actions, choices and decisions inspired by maximum independence and awareness. For this reason, CROMAPLAST S.p.A. recognizes the fundamental value of correct information to members, organs and competent functions, with regard to the significant facts concerning the corporate and accounting management and in no way justifies actions of its collaborators that prevent the control by the entities or organizations in charge.

Cromaplast S.p.A. promotes a continuous, timely and complete flow of information between the corporate bodies, the different business areas, the Management, the various top figures, and, where



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necessary, towards the Public Authorities. The information transmitted outside and within the organisation shall comply with the requirements of truthfulness, completeness and accuracy, including economic, financial and accounting data.

## **Integrity**

CROMAPLAST S.p.A. bases its action on respect for the rules, professional ethics and the value of the person; it promotes conduct inspired by consistency, transparency, fairness and mutual trust in full respect of this Code of Ethics.

## **Respect**

The solidity of success is based on the constant enhancement of the human factor. CROMAPLAST S.p.A. believes in the contribution of all towards the success of their actions, the result of the work and ideas of all. A company culture is spread to eliminate any possible discrimination creating the best conditions where everyone can best express their potential while respecting other subjects.

## **Excellence**

CROMAPLAST S.p.A. invests considerable energy in facilitating excellence in all its processes with which it creates value. The achievement of the expectations of all those who benefit from our work requires first of all the maximum commitment of those who work there: passion, overcoming obstacles, listening to requests and the spirit of collaboration are part of the behaviors that underpin the success of society.

## **Impartiality**

CROMAPLAST S.p.A. operates with impartiality, avoiding in all circumstances preferential treatment. In order to ensure the full implementation of this impartiality, no form of gift or homage may be understood as exceeding normal commercial practices or courtesy, or in any case aimed at acquiring preferential treatment in the conduct of any activity of the Company.

CROMAPLAST S.p.A. has long decided to use, as a gift or gift, the financing of projects for the adoption and support of children at a distance, through the intermediation of recognised associations and through the communication to the public and the social bodies of the funded projects.

In the management of hierarchical relationships, CROMAPLAST S.p.A. guarantees that authority is exercised with equity and fairness, excluding any abuse.

## **1. GENERAL PRINCIPLES**

### **1.1 COMPLIANCE WITH LAWS, ETHICAL PROVISIONS, REGULATIONS AND PROCEDURES**

The Addressees are obliged to respect with diligence the laws in force in all the Countries in which the Company operates, the Code, any other ethical provisions, to which the Company has adhered and the internal regulations. In no case may the pursuit of the Company's interest justify conduct that is not honest and does not comply with current legislation, the relevant ethical provisions and this Code.

To this end, CROMAPLAST S.p.A. requires from its members, directors, employees, collaborators, agents, business partners, suppliers, contractors and anyone carrying out any function of representation, even de facto, compliance with legislation, human rights and all existing rules and principles and procedures for this purpose, as well as ethically correct behaviour, which does not affect their moral and professional reliability.



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The Recipients are also required to respect the operating procedures of the company.

In carrying out their respective activities, the Recipients are required to know and respect the rules of the legal order (national, supranational or foreign) in which they operate. Any regulatory violations must be reported to the competent authorities.

### 1.2 CONFLICT OF INTEREST

A conflict of interest is a case in which an interest other than the Company's corporate mission is pursued or where activities are carried out that may interfere with the Company's ability to make decisions in the sole interest of the Company, or take personal advantage of the Company's own business opportunities.

CROMAPLAST S.p.A. recognizes and respects the right of its employees, collaborators, directors, members to participate in investments, business or other activities outside those carried out in the interest of the Company, provided that these are activities permitted by law and contractual rules and compatible with the obligations assumed towards the Company.

Every employee, collaborator, director, shareholder of CROMAPLAST S.p.A. is obliged to avoid all situations and activities in which a conflict with the Company's interests may arise or which may interfere with its ability to assume, impartially, decisions in the best interests of the company and in full compliance with the rules of the Code of Ethics.

Any situation that may constitute or determine a conflict of interest must be promptly communicated by each employee, collaborator, director, member to their superior or corporate contact.

In particular, all employees, collaborators, directors, members of CROMAPLAST S.p.A. are required to avoid conflicts of interest between personal and family economic activities and the tasks they perform within the structure to which they belong.

A conflict of interest may arise when, in the course of its activities, inter alia:

- a) there are interests, including economic and financial interests, direct or indirect, which may influence its activities;
- b) a personal, financial and non-financial advantage can be obtained by accessing and misuse of information;
- c) engage in activities with or in favour of Company suppliers;
- d) confidential information on the activities carried out by the Company before it has given official notice is disseminated, also during informal meetings;
- e) the position or role shall be exploited in such a way as to obtain personal advantage of any kind;
- f) we accept money, favors or utilities not due by persons or companies that are or intend to enter into business relations with the Company.

If the Addressees of the Code are or consider that they may be in a position of conflict of interest or if there are serious reasons for convenience, they must refrain from taking any decision and/or carrying out any activity the effects of which fall, directly or indirectly, on the Company.

Both in case of abstention, and if it is not possible to abstain, you have the duty to inform in advance your Manager or Business Contact, communicating the reasons for the potential conflict, the Responsible





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Person will in turn be required to inform the Company Summit in a timely manner, which will assess the actual presence of such a conflict and authorise potentially conflicting work activity, only after the necessary action has been taken to end the conflict.

At the reasoned request of the Company and/or the Supervisory Body, the interested party is required to provide further information on the actual or potential conflict of interest situation in which he or she believes to be involved.

It is therefore forbidden to engage in actions and behaviors potentially in conflict with the activity of the Company or with the purposes and interests it pursues, as well as to carry out activities or take decisions that may be linked, directly or indirectly, an interest, financial or non-financial, proper, of the spouse, of relatives within the fourth grade and/or cohabiting, of related persons (friends, acquaintances, etc.) or of organisations of which the above mentioned persons are directors or managers, that may fail the duty of impartiality and conflict with the activity and purposes of the Company, in the name or on behalf of which it operates.

## 1.3 HARASSMENT AND DISCRIMINATION

In decisions that affect relations with its stakeholders, CROMAPLAST S.p.A. avoids any discrimination on the basis of gender, age, sex, sexual orientation, health status and/or disability, race, nationality, ethnic origin, social conditions, language, personal beliefs, political views and religious beliefs of its interlocutors, including any form of sexual harassment or harassment.

The Company shall:

- a) ensure a working environment that values the diversity of employees, while respecting the principle of equality, taking care to protect the dignity and freedom of every employee in the workplace;
- b) guarantees the principle of equal treatment as "absence of any discrimination";
- c) does not tolerate any kind of racial, sexual, political, trade union or religious discrimination;
- d) ensures the application of a collective agreement and company agreements to all jobs; including the regulation of child, youth, ordinary and overtime work, "modern slavery", freedom of association and collective consultation, communication at all levels with respect for human rights;
- e) ensures the application of all applicable health and safety standards;
- f) does not allow any form of human trafficking;
- g) imposes an obligation to refrain from any intimidation, harassment or harassment;
- h) does not admit sexual harassment, meaning "sexual harassment" any unwanted act or behavior, even verbal, with a sexual connotation causing offense to the dignity of the person who suffers; Furthermore, it does not accept the creation of a climate of intimidation against the person who is subjected to such harassment.

Those who believe that they are the subject of harassment or discrimination or are aware of intimidation, discrimination or harassing and/or discriminatory behaviour in place must inform its Manager and/or the Human Resources Manager and/or the Company Summit, as well as the Supervisory Body, who will promptly and confidentially take all the actions they deem appropriate, in order to overcome the uncomfortable situation and restore a peaceful working environment; in particular by ensuring equal opportunities for men and women, including in terms of economic and other treatment.



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Cromaplast s.p.a. is committed to support every worker who reports having suffered harassment or sexual harassment in the workplace and to this end commits to guarantee maximum protection of confidentiality and to prevent any possible retaliation. Similar guarantees are extended to any witnesses.

Cromaplast s.p.a. is committed to prepare specific training interventions which focus is that of protecting the freedom and dignity of the person with the aim of preventing the occurrence of conducts that can be classified as harassment or sexual harassment.

Cromaplast s.p.a., finally, will give the disciplinary procedure pursuant to art. 7 of law no. 300/1970 against individuals who commit sexual harassment. In the most serious cases, a precautionary suspension measure will be adopted.

### 1.4 QUALITY AND SAFETY OF PRODUCTS

CROMAPLAST S.p.A. pursues its mission through the offer of quality products, at competitive conditions and in compliance with all mandatory standards.

CROMAPLAST S.p.A. ensures the placing on the market of products complying with national and Community laws on the subject, activating all the necessary controls for the purpose.

### 1.5 RESPONSIBILITY FOR COMMUNITIES AND THE ENVIRONMENT

CROMAPLAST S.p.A. is committed to managing its processes with criteria of environmental protection and efficiency through the identification, management and control of its environmental aspects, and through the rational use of energy resources and the minimization of emissions, according to a development model compatible with the territory and the environment.

The Company shall:

- a) ensure that all actions aimed at reducing and/or minimising the impact on climate change are implemented with the objective of "carbon neutrality";
- b) implement and comply with all health and safety regulations;
- c) regularly checks the air quality, water quality and avoids any form of waste;
- d) ensures that substances which are prohibited and dangerous to man, the environment and animals are not used;
- e) shall ensure the proper management of waste and, where possible, implement all actions that make reuse possible. It does not accept in any way non-conforming management of hazardous waste;
- f) use and reuse "sustainable" packaging;
- g) minimises the use of energy from fossil sources, preferring energy from renewable sources;
- h) implement all possible measures for reforestation and protection of forests;
- i) implement all possible procedures and practices to facilitate the reduction of CO2 emissions and decarbonisation;
- j) protects the country's landscape and artistic heritage. It protects the environment, biodiversity and ecosystems, including in the interests of future generations;
- k) protects the protection of all animal species, especially those in danger of extinction;
- l) implements all possible measures for soil conservation in addition to biodiversity conservation, mitigation of changes but also through active support to ecosystems.



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The company considers it essential that all those who enter into relationships, be they customers or suppliers, collaborators or consultants, adopt all the most appropriate and responsible behaviour towards the community and the environment.

### 1.6 ALCOHOL AND DRUG ABUSE

The Company considers it reprehensible to carry out work under the influence of alcohol or drugs and also to use these substances during working hours.

It also urges all staff to conduct themselves with the utmost integrity and fairness.

Any person who identifies behaviour that conflicts with the principles and rules contained in this Code of Ethics and/or the Organisation Model must inform their Manager and/or the Human Resources Manager and/or the Company Summit, as well as the Supervisory Body, who will take care, as soon as possible and confidentially, to carry out all the actions they deem appropriate.

### 1.7 SMOKE

Smoking is prohibited in the workplace, in places accessible to the public and in places where computer equipment is kept.

The Company, in any case, takes into account the condition of discomfort, on the one hand, of non-smokers and, on the other hand, of smokers, identifying where it is possible, possibly, areas for smokers, in compliance with current legislation.

Those who identify conduct in conflict with the principles and rules in question must inform their Manager and/or the Human Resources Manager and/or the Company Summit, as well as the Supervisory Body, who will take care, as soon as possible and confidentially, to carry out all the actions they deem appropriate.

### 1.8 CULTURAL HERITAGE

The company is committed to recognising, protecting and preserving cultural heritage. Cultural goods are defined as immovable and movable objects of artistic, historical, archaeological, ethno-anthropological, archival and bibliographical interest and other things identified by law or according to law as testimonies of civilisation.

The Company therefore:

- refrains from carrying out activities that may constitute a violation of the rules governing the protection of heritage of relevance and/or cultural or landscape interest;
- undertakes to respect the provisions of the current regulations on cultural and landscape constraints and the Protection of Cultural Heritage, with particular regard to the Code of Cultural Heritage (D.lgs. 42/2004).



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## 2. RULES OF CONDUCT - STAFF

### 2.1 HUMAN RESOURCES

Human resources are an indispensable element of the company's organization and therefore represent the main source of the Company's success, both from the most general institutional point of view and from the most strictly corporate point of view.

The Company offers all employees the same opportunities, on the basis of merit criteria and in compliance with the principle of equality, and allows everyone to develop their own attitudes, skills and competences, preparing, if necessary, training programmes and/or refresher courses.

The Society protects disabled workers by promoting their integration into the working environment.

The Company implements a continuous process of verification of the guiding principles in order to identify, preventing, mitigating and informing the ways in which the negative impacts of economic activity on human rights are addressed or which are directly related to operations, products or services provided through its economic activities. The process also assesses the actual and potential impacts on human rights, the integration of outcomes and possible corrective actions, the monitoring of the responses taken and the communication of how these impacts are addressed.

All employees must be aware of the regulations governing the performance of their duties and the consequent behaviours, as well as of the Company Regulations which are intended here in full recalled, known and accepted by all staff.

### 2.2 RECRUITMENT

The simple promise to hire a subject in exchange for favors can be illegal.

The recruitment process must be aimed at selecting the most suitable and valuable person according to the correspondence of the candidates' profiles and their specific skills, with respect to the company's needs, as they result from the request made by the requesting function and, always, respecting equal opportunities for all stakeholders.

The information requested is closely linked to the verification of the aspects required by the professional and psychoaptitude profile, respecting the private sphere and the views of the candidate.

Favouritism, nepotism or cronyism in the selection and recruitment phases are generally prohibited. Any discrimination against persons shall be prohibited.

All decisions taken in the field of human resources management and development are based on considerations of merit profiles and/or correspondence between expected profiles and profiles owned by employees. The same applies to access to different roles or positions.

The Human Resources Manager is responsible for verifying compliance with the principles outlined above, within the limits of the information available, and for taking appropriate preventive measures.

The Company is strictly prohibited to employ foreign workers without a residence permit or with a revoked or expired permit, for which no application for renewal has been submitted documented by the relevant postal receipt.

The general principles governing the selection and recruitment process are:



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1. Recruitment shall be carried out in such a way as to respect, protect and ensure the application of internationally recognised human rights, including the rights provided for in international labour standards, in particular the right to freedom of association and the right to contract. The European Council also stressed the importance of the European Union's contribution to the development of the European Union.
2. The application of employment and recruitment legislation and policies to all workers,
3. Recruitment shall take into account policies and practices that promote the efficiency, transparency and protection of workers in the recruitment process, including the mutual recognition of skills and qualifications.
4. The rules on employment and recruitment must be clear and transparent and applied effectively. The role of the labour inspectorate and the use of standard registration, grant or certification procedures are highlighted. All specific measures shall be taken against abusive and fraudulent recruitment methods, including those which may lead to forced labour or trafficking in human beings.
5. Cross-border recruitment must be carried out in accordance with the laws, regulations, contracts of employment and collective agreements in force in the countries of origin, transit and destination, as well as with internationally recognised human rights, including fundamental principles and rights at work, and relevant international labour standards. These laws and rules should be implemented effectively.
6. No recruitment fees or other related costs should be charged to workers or job seekers.
7. The terms and conditions of employment of a worker must be specified in an appropriate, truthful and easily understandable manner, and preferably through written contracts, in accordance with the laws, regulations, employment contracts and collective agreements in force in the country. Contracts must be clear and transparent and must provide workers with information on the place of employment and the requirements and duties required for the work for which they are recruited. In the case of migrant workers, written contracts must be drawn up in a language understandable to the worker, provided sufficiently in advance of departure from the country of origin, subject to measures to prevent their replacement and be legally effective.
8. Contracts of employment are voluntary and free from any deception or coercion regarding the terms and conditions of recruitment and employment.
9. Workers must have access to free, complete and accurate information about their rights and the conditions of recruitment and employment.
10. The freedom of workers to move within a country or to leave a country must be respected. Identification documents and employment contracts must not be seized, destroyed or detained.
11. Workers will be free to terminate their employment relationship and, in the case of migrant workers, to return to their country. Migrant workers should not be obliged to request permission from the employer or recruiter to change employer.

### 2.3 STAFF EVALUATION AND MANAGEMENT

The Company undertakes to ensure that in its business organization the fixed objectives, both general and individual, of the staff, are such as not to induce illegal behavior and are, instead, targeted on a possible result, specific, concrete, measurable and related to the time provided for their achievement.

In the management of hierarchical relations authority is exercised with fairness and fairness, avoiding any abuse. It is an abuse of the position of authority to require, as an act due to the hierarchical superior, performance, personal favors and any behavior that constitutes a violation of this Code.



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Human resources are fully exploited by activating the levers available to foster their development and growth.

Any situation of difficulty or conflict with this principle must be promptly reported by anyone to the HR Manager, as well as to the Supervisory Body, in order to take any corrective action.

The competent functions should therefore:

- select, recruit, train, pay and manage employees or collaborators without discrimination;
- create a working environment in which personal characteristics cannot give rise to discrimination;
- adopt criteria of merit, competence and in any case strictly professional for any decision relating to an employee or collaborator;
- guarantees equal pay and career development for all employees;
- ensure a healthy and safe working environment for all employees, members and collaborators;
- inform all employees and collaborators of all regulatory, contractual, regulatory and safety practices.

### 2.4 RIGHTS AND OBLIGATIONS OF HUMAN RESOURCES

Every employee, director, member and collaborator in any capacity of CROMAPLAST S.p.A. is required to know the rules contained in the Code of Ethics and the reference rules governing the activity carried out within its function, arising from the Law or from internal procedures and regulations.

Every employee, director, member, agent and collaborator in any capacity of CROMAPLAST S.p.A. must also accept in explicit form their commitments arising from this Code of Ethics, at the time of the establishment of the employment relationship or the first dissemination of the Code of Ethics.

In particular, each of them shall:

- a) observe the instructions and instructions given by the Company, the Executive or, in any case, its Managers;
- b) to fulfil all the obligations necessary for the protection of safety and health at work;
- c) to provide colleagues, managers and/or their managers with adequate cooperation, communicating all the information and putting in place all the behaviors that allow to operate with the maximum efficiency in the execution of the assigned tasks and in the pursuit of the common objectives;
- d) avoid abusing or engendering false beliefs in relation to your position, role or powers held within the Company and the role of the Company itself, intervening immediately in order to eliminate any and any misunderstanding;
- e) not to perform acts contrary to official duties, or to omit or delay an official act for the undue achievement or promise of money or other use for oneself or for others;
- f) in order to maintain the confidence of the market and in particular of suppliers towards the Company, treat all in a fair and equitable way, avoid favors or pressures, real or apparent, in order to obtain particular advantages from certain suppliers;
- g) keep confidential information relating to the Company's activities, as well as information of a financial and economic nature;
- h) not use information obtained in the course of the activity carried out for the Company for personal purposes or to obtain financial or non-financial advantages;



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- i) to promote knowledge of the Code with regard to all those with whom they have formal and informal relations in the course of their activities;
- j) not disclose any information about the Company's suppliers to third parties and in particular to other suppliers of the Company;
- k) not to denigrate, in any case, the Company and/or who has had relations of any nature and for any reason with it;
- l) not to participate in informal meetings with interested parties to obtain information on matters relevant to the office activity, unless expressly authorized by its Manager;
- m) report truthfully and correctly to the Company the information to which it is required, such as, for example, the summary report of the time spent, the expense report, the minutes of the activities carried out, etc.;
- n) acquire the professional skills necessary to carry out their work and maintain an adequate level of knowledge and experience throughout the employment relationship, constantly updating their preparation and attending refresher courses or retraining courses proposed and activated by the Company;
- o) not derive profits or benefits, direct or indirect, financial or otherwise, with or without harm to the Company, from the performance of its work;
- p) conduct and use appropriate language and clothing for the working environment;
- q) to comply promptly and proactively with the requirements of the Model (such as, for example, training courses, sending reports, participation in meetings with the ODV, etc.), avoiding obstructive behavior that may compromise the functioning of the Model, the ODV and the supervision of the functions assigned to the control.

In addition, all CROMAPLAST personnel are prohibited:

- a) showing up or being drunken at work as a result of alcohol or hallucinogenic, psychotropic or narcotic substances;
- b) consuming or bringing into the working environment alcoholic beverages (including beer) or hallucinogenic, psychotropic or narcotic substances;
- c) to express themselves in a provocative way, to disturb or shout in the workplace as well as to introduce or use any type of electronic audio device even if equipped with a headset; this prohibition also extends to mobile phones (which can be stored in the supplied lockers), for incoming or outgoing urgent calls, company telephones are available, whose numbers can also be provided to family members;
- d) to move during working hours from one's place for no justified reason or without the prior permission of their manager;
- e) soiling, writing, engraving, removing VAT, walls, furniture and fixtures, as well as displaying inappropriate images at the workplace;
- f) to bring into the factory, except in the cases provided for by law, weapons, blunt instruments or devices capable of being detonated and deflagrated or otherwise liable to cause damage to property or persons;
- g) to define or tamper with signs, hats and notices issued by the company or recognised organisations;
- h) promote within the factory collections or collection of signatures, tickets, leaflets or other objects, post posters or other, without the prior authorization of the company, subject to the provisions of Law 300 of 20 May 1970;
- i) smoking within the company perimeter, no smoking and only in equipped areas;





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- j) remove any farm property, even if deemed to be waste, scrap or scrap, unless authorised by the holding;
- k) make, without prior written permission of the company, copies for personal use of drawings, writings, forms, data collections, company statistics, remuneration and budget data, etc. and in any case any other company document;
- l) steal or transmit to third parties the information described in the previous point;
- m) to behave inappropriately, offensively and insistently, deliberately with regard to sexual, political, trade union, religious or racial status, with the consequence of causing significant distress to the person to whom they are addressed;
- n) it is also prohibited to disseminate leaflets or any other type of communication unless legally authorised;
- o) publish/disclose in private chats, forums, social (e.g. Facebook), email, as well as through any other IT platform, images, news, data, information, comments related to the workplace and the people and things related to it (eg: employer, colleagues, superiors, products, customers, etc. ).

### 2.5 USE OF COMPANY PROPERTY

Every employee, collaborator, agent, partner, member, director of CROMAPLAST S.p.A. is obliged to operate with due care and diligence to protect the property owned by the Company, by behaving responsibly and in line with the operating procedures established to regulate their use, documenting, where appropriate, their use.

Every employee, collaborator, agent, partner, partner, Managing Director of CROMAPLAST S.p.A. is responsible for the protection of the resources entrusted to him and has the duty to promptly inform the structures in charge of any threats or events harmful to the Company or its assets.

In particular, employee, collaborator, partner, partner, director of CROMAPLAST S.p.A. is obliged to:

- avoid improper use that could cause undue costs, damage or reduction of efficiency or otherwise contrary to the interest of the Company;
- in the use of the means of communication made available by the Company (PCs, fixed and mobile phones, network connection tools, etc.), take all necessary precautions to prevent any form of use contrary to the law and internal regulations of CROMAPLAST S.p.A.; in the case of use of the means in question outside the contractually provided purposes, it is necessary to have a formal authorization of the Company;
- strictly adopt the provisions of internal policies and procedures, in order not to compromise the functionality, protection and security of the Company's IT systems, equipment and installations;
- always operate in compliance with the safety rules provided by the Law and internal procedures, in order to prevent possible damage to property, people or the environment;
- strictly follow the company signs in terms of access to and use of individual protection tools;
- use the assets owned by the Company, of any type and value, in compliance with the law, internal regulations, and the principles of this Code of Ethics;
- use the goods of the Company exclusively for purposes related to and instrumental to the exercise of business activity; however, it is prohibited, except where provided for by specific regulations or company agreements, the use or disposal of the goods themselves by third parties or third parties, also temporarily;





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- operate, as far as possible, in order to reduce the risk of theft, damage or other threats to the assets and resources assigned or present, informing in a timely manner the functions assigned in case of abnormal situations.

In particular, with regard to the use of company IT systems, the Company Regulations refer in full, in particular Articles 19-20-21-22-23 and 24 concerning the use of personal computers, magnetic media, of the company network and its internet navigation and e-mail. Any violation of this Regulation will be subject to disciplinary sanctions.

### 2.6 PROTECTION OF EMPLOYEES OR EMPLOYEES WHO REPORT WRONGDOING

Acts of retaliation or discrimination shall be prohibited, direct or indirect, against the worker or employee who reports wrongdoing for reasons directly or indirectly related to the relevant reports pursuant to Legislative Decree 231/2001 or violations of the Organization and Management Model of the Institution. It is also prohibited to make intentional or gross negligence reports that prove to be unfounded.

### 2.7 GIFTS AND BENEFITS

In business relations with stakeholders are prohibited any action, benefits (both direct and indirect), tributes, acts of courtesy and hospitality, if not of modest value, such as not to compromise the image of the Company and cannot be interpreted as seeking preferential treatment.

In any case, any freebies, courtesy acts and hospitality are managed only by authorized company managers. Any sponsorships or donations to charity are managed by the President, or by expressly authorized subjects.

The employee, collaborator, agent, partner, administrator who receives/ offers gifts or special treatment that go beyond the ordinary courtesy relationships, must immediately notify the hierarchical superior. The latter will immediately inform the specific bodies and/or the competent company department that, after the preliminary checks, will take the appropriate measures.

The management of relations with stakeholders is based on extremely clear relationships, avoiding, as far as possible, excesses of mutual dependence.

### 2.8 HEALTH AND SAFETY AT WORK

CROMAPLAST S.p.A. promotes and disseminates the culture of safety, developing awareness of risk management, including through specific training, promoting responsible behavior and preserving, especially with preventive actions, the health and safety of all employees and collaborators.

Under current legislation, the Company undertakes to take all necessary measures to protect the physical and moral integrity of its workers.

In particular, the Company undertakes to:

- a) compliance with existing legislation on the health and safety of workers is considered a priority;
- b) the risks to workers are, as far as possible and guaranteed by the evolution of the best technique, also avoided by choosing the most appropriate and least dangerous materials and equipment and to mitigate risks at source;



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- c) the avoidable risks are properly assessed and adequately mitigated through appropriate collective and individual security measures;
- d) the information and training of workers is disseminated, updated and specific with regard to the job performed;
- e) the consultation of workers on health and safety at the workplace is ensured;
- f) respond quickly and effectively to any safety needs or non-conformities arising in the course of work or during inspections and inspections;
- g) the organisation of work and the operational aspects thereof are carried out in such a way as to safeguard the health of workers, third parties and the community in which the Company operates.

The workers, each to the extent of their competence, are required to ensure full compliance with the law, the principles of this Code and company procedures and any other internal provisions laid down to ensure the protection of health and safety at work, as well as to report any violations or even simple attitudes or practices contrary to the provisions of the Code of Ethics and the Model.

### 2.9 INFORMATION MANAGEMENT AND PRIVACY

The privacy of employees, collaborators, agents, partners, administrators and members and the confidentiality of information is protected in compliance with the relevant legislation, also through operational standards that specify the information received and the related methods of processing and storage, as required by the security policy document, to which all staff is required to strictly adhere. Any investigation of people's ideas, preferences, sexual inclinations, personal tastes, private life and state of health is excluded.

Any whistleblowing information given by the Worker is given to the human resources that holds it and manages it as confidential information. The company has also provided boxes of signals, closed, where to receive requests from individual workers. If such reports affect the Business Continuity, a process of escalation is implemented to the Directorate-General for an urgent resolution of the report.

## 3. RULES OF CONDUCT FOR THE PUBLIC ADMINISTRATION

### 3.1 RELATIONS WITH PUBLIC ADMINISTRATION

The Company's relations with the Public Administration, the public officials<sup>1</sup> or the subjects in charge of a public service<sup>2</sup> must be based on the strictest impartiality and fairness, compliance with applicable laws and regulations and may in no way compromise the integrity or reputation of the Company.

The assumption of commitments and the management of relations, of whatever nature, with the Public Administration, public officials or subjects in charge of a public service, are reserved exclusively to the corporate functions assigned to it and to the authorized personnel.

In any case, these subjects are required to keep diligently all the documentation relating to relations with the Public Administration.

<sup>1</sup> For Public Official ex art. 357 c.p. is meant, as a mere example, the Customs Authority, the Port Authority, the Guardia di Finanza, etc.

<sup>2</sup> For a public service appointed pursuant to art. 358 c.p. means, as a mere example, employees of public bodies that do not exercise certifying or sanctioning powers, with the exclusion of purely material tasks, etc.



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In the context of relations with the Public Administration, public officials or entities in charge of a public service, the Recipients are required to abstain:

- a. to offer, even for the intermediary person, money, employment or business opportunities or more generally other benefits, to the public official, his family members or persons in any way connected with the same;
- b. to seek or illicitly establish personal relationships of favor, influence, interference suitable to condition, directly or indirectly, the outcome of the relationship.

### 3.2 RELATIONS WITH PUBLIC INSTITUTIONS AND SUPERVISORS

The Company maintains relations with public institutions according to the principles of integrity, fairness and professionalism.

Relations with public, local, national and international institutions are reserved exclusively for the functions and responsibilities delegated to them.

CROMAPLAST S.p.A. undertakes to establish, without any kind of discrimination, stable channels of communication with all institutional interlocutors at local, national and community level.

These relations should be oriented towards criteria of maximum transparency and fairness, rigour and consistency, avoiding collusive attitudes.

The Recipients are required to scrupulously observe the current legislation in the areas related to their respective areas of activity and the provisions issued by the competent Institutions and/or Supervisory Authorities.

Recipients respond promptly to any request from the Supervisory Authorities competent to carry out checks or controls, providing full cooperation and avoiding obstructive behavior.

On the occasion of audits and inspections by the competent public authorities, the Corporate Bodies and their members, the Company's employees, consultants, collaborators and third parties acting on behalf of the Company, must maintain an attitude of maximum availability and cooperation towards the inspection and control bodies.

Is prohibited in any way to hinder the functions of the Public Supervisory Authorities that come into contact with the Company due to their institutional functions.

### 3.3 RELATIONS WITH THE JUDICIAL AUTHORITY

The Company operates lawfully and correctly, collaborating with the Judicial Authority and the Organs delegated by the same.

As part of any existing disputes, the activities carried out for the management of the same must be based on the principles of legality, fairness, transparency and all other ethical principles defined in the Code.

All Company personnel and those acting on behalf of the Company must promptly notify the Human Resources Manager, and/or the Chief Executive Officer, of any information relating to the possible occurrence, or the existence, of a criminal trial relating to an offence provided for by the Decree, against themselves or any subject of the Company and inherent in their activities in the Company.



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In particular, managers, employees and collaborators in any capacity of the Company must refrain from unlawful conduct, such as, for example:

- a) to give or promise money or other benefits to Public Officials or to persons in charge of a public service or to persons indicated by them in order to influence also the impartiality of their judgment;
- b) sending false documents, certifying non-existent requirements or providing guarantees/declarations that do not comply with the truth;
- c) delete documents or destroy archived documents;
- d) to give or promise money or other benefits to the legal advisors of the Counterparty Companies in a dispute in order to have a favorable outcome in the dispute.

The Human Resources Manager must take care to protect the confidentiality of the information received on any ongoing proceedings, identifying the subjects who may become aware of them and the way they are stored and stored.

Is prohibited everyone from exerting any kind of pressure on the parties involved in proceedings in any capacity or role, such as, for example:

- promise salary increases or career advancements, or
- threaten redundancies or pay cuts, as well as other forms of transfer or transfer.

The company rules/procedures to determine how to deal with the subjects involved in a procedure for any reason or role that may not be answered must be adhered to (both in terms of telephone contacts, as well as possible measures such as the possible suspension of the assignment, the suspension of evaluations related to the award process, the suspension of disciplinary sanctions, etc.) in compliance with the legal norms characterizing the relationship between the subject and the Company.

Any judicial proceedings relating to the relevant offences under the Decree must be promptly communicated to the ODV.

### 3.4 OFFERING MONEY, GIFTS OR OTHER UTILITIES

CROMAPLAST S.p.A. condemns any conduct, on its behalf, by the Corporate Bodies and their members, or by employees of the Company, as well as by consultants, collaborators and third parties acting on behalf of the Company, consisting in promising or offering, directly or indirectly, money, services, services or other utilities to Public Officials and/ or Public Service Agents Italian or foreign, unless they are gifts or other utility of small value and, in any case, falling within the customs, customs or legitimate activities, that may result in an undue or unlawful interest or advantage for the Company.

Any employee, collaborator, agent, member, director who receives directly or indirectly requests or offers of money or favors of any kind (e.g. gifts or gifts of no small value) unduly made to those, or by those who work on behalf of CROMAPLAST S.p.A. in the context of relations with public officials, public service employees or employees in general of the Public Administration (Italian or other foreign countries) or other public institutions, or with private parties (Italian or foreign), must immediately report to the internal department responsible for taking the consequential measures. As an indication, gifts exceeding the threshold of 150 euros are not considered of low value. Any exceptions must be duly justified, traced and authorised by the Corporate Summit.



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### 3.5 INFLUENCE ON THE DECISIONS OF THE P.A.

The persons appointed by the Company to follow any business negotiation, request or relationship with the Italian and/or foreign P.A. , they must not for any reason try to unlawfully influence the decisions of the Public Officers or Public Service Agents who deal and make decisions on behalf of the Italian or foreign P.A.

During a business negotiation, request or commercial relationship with Public Officials and/or Public Service Officers, Italian or foreign, cannot be undertaken - directly or indirectly - the following actions:

- propose - in any way - employment and/or commercial opportunities that may benefit the Public Officials and/or Public Service Agents in a personal capacity or by interposed person;
- offer in any way money or other utility, except for gifts, tributes or other utilities of small value and, in any case, falling within the legitimate customs or customs;
- carry out any other act aimed at inducing Italian or foreign public officials to do or fail to do something in violation of the laws of the legal system to which they belong.

### 3.6 WORKING RELATIONS WITH THE P.A.

It is forbidden to establish employment relationships and/or any other form, including consulting with former employees of the PA, Italian or foreign, who, because of their institutional functions, participate or have personally and actively participated in business negotiations or endorsed requests made by the Company to the PA, Italian or foreign, unless such relations have not been previously and adequately declared to Human Resources, and evaluated by the Company Summit, as well as communicated to the Supervisory Body, before proceeding with the possible assumption/establishment of the relationship.

### 3.7 TRANSPARENCY OF THE MANAGEMENT OF THE FINANCING AND CONTRIBUTIONS OF THE P.A.

The Company condemns any conduct aimed at achieving, by the State, European Bodies or other public body, any type of contribution, financing, subsidized loan or other payment of the same type, by means of altered or falsified declarations and/or documents, or by means of information omitted or more generally, by means of artifice or deception, including by means of a computer and/or telematic system, to mislead the paying agency.

CROMAPLAST S.p.A., in the request and management of facilities, contributions and financing of any kind obtained by the State, by another public body or by the European Union, demands from its employees, collaborators and directors compliance with the principles of legality, transparency and fairness.

To this end, CROMAPLAST S.p.A. and its employees, collaborators, members and, directors and representatives in any capacity must:

- operate, without any kind of discrimination, through the appropriate communication channels with institutional interlocutors at national and international, Community and territorial level;
- represent the interests and positions of the Company in a transparent, rigorous and consistent manner, avoiding collusive attitudes;
- avoid falsification and/or alteration of the records or of the documentary data in order to obtain an undue advantage or any other benefit for the Company and avoid the allocation of public funds for purposes other than those for which they were obtained;
- carry out a scrupulous check of the data contained in the declarations addressed to public bodies;



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In any case, CROMAPLAST S.p.A. and its employees, collaborators, members, directors undertake to report any information of conduct contrary to the principles set out above that they are aware of, even if held by any competitors and/ or partners.

Is prohibited to allocate to purposes other than those for which they were granted, contributions, grants or funding obtained by the State or other public body or by European Bodies even of modest value and/ or amount.

### 3.8 CONFLICTS OF INTEREST WITH P.A.

The Company may not be represented in relations with the Public Administration, Italian or foreign, by subjects in a recognised conflict of interest position, unless such a situation has been, as a preliminary step, adequately declared to the Top Management, as well as the Supervisory Body, and from the first evaluated on the possibility of conferring the aforementioned power of representation.

Subjects operating on behalf of the Company are obliged to refrain from maintaining relations with the Public Administration, Italian or foreign, in any case in situations of conflict of interest.

## 4. RULES OF CONDUCT IN RELATIONS WITH SUPPLIERS, CUSTOMERS AND THIRD PARTIES IN GENERAL

Cromaplast maintains business relationships exclusively with customers, companies, partners, suppliers and contractors of a certain reputation, who carry out lawful commercial activities and whose proceeds derive from legitimate sources.

This Code provides the minimum requirements of Cromaplast's partner companies in the areas of business ethics, human rights, working conditions and environmental responsibility.

It applies to all business partners of Cromaplast through the entire supply chain which includes, but is not limited to consultants, sellers, subcontractors, resellers or contractors, referred to as "Suppliers" in the following parts of the Code. Suppliers are required to encourage their subcontractors and subcontractors to comply with this Code.

Suppliers must comply with all applicable local social, health and safety, commercial and environmental laws and regulations. Cromaplast expects its suppliers to follow the principles of the UN Global Compact on human rights, labour rights, the environment and the fight against corruption. In case of violation of the Code, Cromaplast reserves the right to reconsider/terminate business relations with suppliers.

### BUSINESS ETHIC

**Privacy and data protection:** Cromaplast requires compliance with the laws and regulations on privacy and information security in order to prevent data loss or unauthorized access and use thereof.

**Anti Corruption:** All forms of corruption, such as bribery or extortion, should not be tolerated. In case of anomalies found, they must be reported and resolved.

**Financial Responsibility:** Suppliers' financial reports must comply with the necessary laws and standards, while accounting records must highlight the nature of all transactions in a fair and not misleading manner. The supplier must not accept, facilitate or support money laundering in any way. The supplier must comply with the laws and tax regulations in force in the country in which it operates. Where these laws do not provide clear guidance, transparency and common sense they will be the guiding principles.





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**Anti-trust and Competition:** The activity will be conducted in an honest manner, in accordance with all applicable antitrust and competition laws and regulations.

**Conflict of Interest:** Suppliers are required to conduct business activities in order to avoid any form of impropriety and to comply with national and international laws in order to avoid conflicts of interest.

**Sanctions and Export Control:** Activities will be conducted in compliance with any applicable restrictions on trade between certain companies, countries or individuals (embargoed/sanctioned countries).

**Whistleblowing and Retaliation:** Suppliers are required to set up a system that allows you to make any reports anonymously and without any kind of repercussions towards the signallers.

Cromaplast Spa is equipped with a system for reporting significant illicit conduct pursuant to D.Lgs. 231/2001 and/or violations of the Organisation, Management and Control Model, including the Code of Ethics, (called "whistleblowing"), in the awareness that fraudulent behaviour damages the tangible and intangible assets of the Group and that everyone's collaboration is necessary to combat them.

Reports can be made through a specific dedicated platform that uses encryption tools capable of guaranteeing the confidentiality of the identity of the reporter, the content of the reporting and related documentation. The operating methods for managing this process are governed by a specific company procedure.

**Supply Chain:** Suppliers must ensure that the entire supply chain complies with the requirements of this Code.

**Origin of Materials:** All materials used in products supplied to Cromaplast come from responsible sources. Suppliers are required to cooperate and support the efforts that Cromaplast puts in place to ensure full transparency and traceability of the raw material supply chain and must commit themselves in turn to involve suppliers in this action secondary. Due diligence measures should also be taken to ensure, through the supply chain, that there is no risk linked to the direct or indirect financing of armed conflict or to human rights violations, of unethical commercial activities or environmental damage.

**Compliance with EUDR "European Union Regulation on Deforestation 995/2010":** The Supplier declares that it is compliant with and committed to combating illegal logging and deforestation in Europe and around the world. It will adopt sustainability requirements covering both environmental and social aspects that may be subject to due diligence; therefore, it is required to assess and mitigate the risks of importing or exporting raw materials or products from deforested land.

**Compliance with applicable laws and reporting obligations:** Supplier declares that it is and undertakes to continue to comply with all applicable laws in the jurisdiction in which Supplier carries out its business. Supplier shall take all necessary action to comply with the risk management and disclosure requirements of applicable law.

**Report on request to verify materials in products provided to Cromaplast:** Where applicable, in accordance with the Dodd Frank Act (paragraph 1502) and the Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 and to suspected minerals identified by the customer, the supply chain must be monitored and the necessary measures taken to ensure that the risk of conflict minerals is avoided at all costs.

### HUMAN RIGHTS AND WORKING CONDITIONS



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**Pay and benefits:** Compensation paid to employees must comply with all applicable pay laws, including those relating to minimum wage, overtime and statutory benefits.

**Working Hours:** Working hours must comply with applicable local laws.

**Child labour and young workers:** Suppliers must ensure that employees respect the minimum working age set by legal regulations and local labour laws.

**Women's rights:** Cromaplast pays particular attention to the following issues:

- Better working conditions: In order to protect maternity, women are not allowed to work night shifts until the third year of the child.
- In support of maternity, the Company grants to all pregnant workers in production a greater period of pre-partum and post-partum as foreseen in the risks of the specific job.
- No woman is asked to do dangerous, heavy or exhausting work.
- Economic equality and career advancement between women and men are guiding principles.
- Particular attention is paid to work-life balance.

Suppliers are also required to comply with the above principles.

**Forced labour and modern slavery:** Suppliers must not employ any form of forced labour, especially against underage workers.

**Freedom of association and collective bargaining:** Suppliers are required to respect the freedom of association and collective bargaining. To this end, the right of employees to form a workers' council must be respected.

**Harassment and Inclusion of Diversity:** the workplace must be free from all forms of abuse. Suppliers should encourage an environment that allows open communication with management without fear of retaliation.

**Health and Safety:** Suppliers are required to provide a safe and healthy environment for employees by fulfilling or even exceeding local laws on occupational well-being.

**Non-discrimination:** Suppliers must not tolerate any form of discrimination and should encourage a system of ethical and equal recruitment of collaborators regardless of gender, ethnicity, nationality, pregnancy, age, religion, political orientation, marital status, disability, sexual orientation and gender identification.

**Human Trafficking:** Suppliers must prohibit their employees, contractors, subcontractors and agents from engaging in activities related to human trafficking.

### ENVIRONMENT AND SUSTAINABILITY

Suppliers are required to take a proactive approach to environmental responsibility to protect the environment, conserve natural resources and reduce the environmental impact of their production, products and services by maintaining an ISO:9001 certified environmental management system (if possible ISO:14001 through an accredited third party register). Cromaplast invites all suppliers to actively work to reduce or eliminate at source all types of waste and to reduce CO2 emissions in order to limit the global impact. Suppliers are also required to direct their actions towards the welfare of the land and green spaces and to contribute to reforestation.





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**Climate Change:** Suppliers must minimise activities that may impact climate change, in line with the UN Framework Convention on Climate Change (Paris Climate Agreement) and must strive to achieve carbon neutrality.

**Air quality:** Suppliers must ensure that emissions to the environment are minimised and, as far as possible, eliminated.

**Water Consumption and Quality:** Suppliers are required to preserve water through recycling, reuse and reducing its consumption. Suppliers must monitor the use of water and, upon request, notify Cromaplast.

**Chemical Management:** Suppliers are required to eliminate the use of restricted materials to ensure regulatory compliance.

**Hazardous Materials:** Suppliers are required, as far as possible, to minimise the use of materials deemed dangerous or harmful to humans, animals and the environment.

**Waste Management:** Suppliers must support the procurement of sustainable, renewable and recycled materials and actively participate in the reuse and recycling of waste products.

**Energy Consumption Management:** Suppliers are required to minimize the use of fossil energy sources and maximize the use of renewable energy. Suppliers must also actively prepare and implement energy consumption reduction plans.

**CO2 emissions:** Suppliers are required to implement procedures that facilitate the reduction of CO2 emissions and decarbonisation.

**Biodiversity:** Suppliers are required to consider and implement ways to support the replenishment of natural capital and biodiversity, such as animal welfare. Suppliers are held to traceability obligations not only to define parameters for protecting indigenous peoples but also to prevent deforestation.

### BUSINESS RELATIONS

Cromaplast encourages suppliers to adopt a zero tolerance attitude towards corruption and to prevent and act against all forms of extortion. Suppliers must be loyal to all their partners and comply with all applicable anti-corruption and anti-money laundering laws and regulations.

Suppliers shall ensure that their employees do not in any way offer benefits to employees, consultants, subcontractors or representatives of Cromaplast to obtain any form of preferential treatment in their business transactions. Suppliers must prohibit offering invitations, gifts, meals, entertainment or any other preferential treatment or undue advantage to obtain any form of predilection. Invitations or meals exchanged for legitimate commercial reasons must have limited intrinsic value.

Suppliers are required to make decisions based exclusively on objective criteria and to avoid any kind of conflict of interest.

Suppliers are required to comply with applicable antitrust laws, compete fairly and not take advantage of any dominant market positions.

Suppliers are required to communicate openly with Cromaplast about their business activities, structure, financial situation and performance in accordance with current regulations and prevailing industrial practices.



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Suppliers must respect intellectual property rights and the confidentiality of information provided by Cromaplast or, where applicable, Cromaplast's OEM customers.

### 4.1 STYLE OF BEHAVIOUR TOWARDS CUSTOMERS

The Company's attitude towards customers is based on availability, respect and courtesy, with a view to a collaborative and highly professional relationship.

CROMAPLAST S.p.A. pursues its mission through the offer of quality products/services, at competitive conditions and in compliance with all the rules set to protect fair competition.

Employees, collaborators, partners, partners and directors of CROMAPLAST S.p.A. are obliged to:

- provide, with efficiency, courtesy and timeliness, within the limits of the contractual provisions, high quality products or services, that meet the reasonable expectations and needs of the customer;
- provide, where necessary and in the manner and in the forms provided by the company policies, accurate and comprehensive information about the Company's products or services, so that the customer can make informed decisions;
- meet customer expectations in terms of honesty, transparency and full compliance with the law and contractual agreements;
- stick to truth in advertising or other communications.

### 4.2 SELECTION OF SUPPLIERS AND CONTRACTORS

In dealing with suppliers, everyone must be guided by the principles of absolute honesty, loyalty, good faith, balance, fairness, diligence, effectiveness, efficiency, clarity, impartiality, transparency and confidentiality. In particular, we must avoid any behaviour that could cause injury or damage, even indirect, to the Company, and that could unjustifiably favour one supplier over others.

In the choice of suppliers the primary objective is that to avoid every discrimination and to allow the maximum participation and competition between the potential suppliers. It is therefore necessary to observe, within the framework of the current legislation and internal provisions, the procedures established to make the best choice of suppliers and to operate a proper management of the relationship with them, also at the stages of performance of the contract.

The selection of suppliers and contractors and the determination of the conditions of purchase, take place on the basis of objective parameters, such as quality, convenience, price, capacity, efficiency, ethics, compliance with the law.

For CROMAPLAST S.p.A. are, therefore, reference requirements:

- the professionalism of the interlocutor;
- the availability, suitably documented, of means, also financial, organized structures, ability and planning resources, know-how, etc.;
- the existence and effective implementation of quality, safety and environmental management systems;
- the sealing of environmentally friendly pipelines;



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- The tightness of pipelines that do not spill negatively on the image and good name CROMAPLAST S.p.A.;
- full compliance with paragraph 4 above.

In the procurement, procurement and, in general, supply of goods and services CROMAPLAST S.p.A.:

- adopt, in the selection of the supplier, the evaluation criteria provided for by the existing procedures, in an objective and transparent manner by requiring, before making the choice, the documentation attesting to their professional technical competence, the fulfilment of contributing charges, legal and equipment in terms of technical equipment and safety in the workplace;
- does not preclude anyone, in possession of the required requirements, the possibility of competing in the conclusion of contracts, adopting objective and documentable criteria in the choice of candidates;
- ensures sufficient competition for any tender, or request for tenders; any derogations must be authorised and documented;
- observe the contractual conditions and check that they are met in full over time;
- maintains a frank and open dialogue with suppliers, in line with good business practices;
- observes and demands compliance with all the obligations imposed by current legislation, in the fields of environment, safety, public procurement, contribution and tax payments, in the context of procurement, supply and procurement relationships;
- ensures the transmission of all the necessary information to ensure the performance of services in full compliance with mandatory regulations.

With a view to aligning the supply of goods and services with the relevant ethical and environmental principles, CROMAPLAST S.p.A. may require, for particular supplies, social and/or environmental requirements. To this end, specific clauses may be drawn up in individual contracts.

### 4.3 MANAGEMENT OF THE CONTRACTUAL RELATIONSHIP

In dealing with suppliers, anyone/Recipients are required not to:

- accept non-existent benefits;
- authorise unpaid payments,
- entrust third parties with illegal or unethical activities.

At the same time, Recipients must:

- give third parties the opportunity to compare themselves according to rules of fairness in order to maintain business relations with the Company;
- consider potential conflicts of interest before involving a third party;
- choose qualified business partners with a good reputation for quality and honesty;
- ensure that all agreements with business partners comply with the Company's corporate policies.

### 4.4 GIFTS AND OFFERS

Gifts are tangible goods, such as gifts or money, but also intangibles or services and discounts for the purchase of such goods or services or any other direct or indirect utility.



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As regards relations with customers, gifts and representation fees must be compatible with current market rules and practices, must not exceed the permitted value limits and must have been approved and registered in accordance with internal rules.

Relations with the client, public and private, are marked by a sense of responsibility, commercial correctness and a spirit of collaboration.

No one may solicit, or in any case accept, directly or indirectly, for example through their family members, gifts from suppliers, even potential ones, of the Company, if they may appear in any way related to the relationships in existence with the Company or, However, they may leave to be understood their finalization to acquire undue advantages.

It is possible to accept gifts of symbolic or even modest value, provided that the same simultaneously:

- are carried out in compliance with the applicable legislation;
- may not imply that they are linked to advantages obtained or that they are intended to acquire undue advantages;
- are normally offered to any other person having similar relationships or on the occasion of anniversaries or holidays.

In addition, the obligation to:

- not to pay or offer, directly or indirectly, material payments and benefits of any entity to influence or compensate an act of their office;
- do not engage in illegal practices and behaviour, collusive practices, illegal payments, attempts at corruption and favouritism.

Anyone who receives, even at home, gifts as a result of the activities carried out or to be carried out in favor of the Company and falling within the scope of the prohibitions indicated above, has the duty to inform its Manager or the Company Summit, providing for the immediate return of these gifts.

Any exceptions to this policy must be authorized by the Management and communicated to the Supervisory Body.

### 5. RULES OF CONDUCT IN RELATIONS WITH THE COMMUNITY

CROMAPLAST S.p.A. is aware of the effects of its activities on the reference context, on the economic and social development and on the general well-being of the community and takes care, in its work, to balance its interests.

CROMAPLAST S.p.A. believes that dialogue with stakeholders is of strategic importance for the proper development of its business and establishes, where possible, a stable channel of dialogue with associations representing its stakeholders, with a view to cooperating in their mutual interests.

#### 5.1 RELATIONS WITH THE MEDIA

Communication with the media by the Company must be transparent and truthful. The relations with the mass media are reserved exclusively to the corporate function in charge of managing them with the prior authorization of the Corporate Summit.



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No one may provide information about the Company or maintain relations with the mass media, without prior permission from the Corporate Summit.

The publication of articles or studies or participation in conferences or transmissions, even outside work, concerning matters within the competence of the Company, must be authorized in advance by the Board, unless it specifies the personal nature of the assessments made relating to the activity carried out by the Company and specifies that they do not necessarily represent the official position of the Company. However, it is not allowed to make statements, statements or communications to the public that may in any way harm or put in a bad light the position and the work of the Company.

In no way or form employees, collaborators, agents, directors, associates may offer payments, gifts, or other benefits aimed at influencing or reasonably construed media functions.

### 5.2 ECONOMIC RELATIONS WITH POLITICAL PARTIES AND TRADE UNIONS

Direct or indirect contributions to parties, movements, committees and political or trade union organisations, as well as to their representatives and candidates shall be prohibited in any form. Because of this principle, CROMAPLAST S.p.A. does not provide any contribution to parties, movements, committees and political and trade union organizations, their representatives and candidates, throughout the national territory.

### 5.3 RELATIONS WITH NON-PROFIT ORGANISATIONS

Cromaplast S.p.A. welcomes and, where appropriate, provides support for social and cultural initiatives aimed at promoting the person and improving the quality of life, subject to the approval of the Company Managers.

## 6. RULES OF CONDUCT IN COMPANY ACTIVITIES

### 6.1 OPERATIONS AND TRANSACTIONS

Every transaction and/or transaction, understood in the broadest sense of the term, must be legitimate, authorized, consistent, fair, documented, recorded and at all times verifiable.

The procedures governing the transactions must allow the possibility of carrying out checks on the characteristics of the transaction, on the reasons for its execution, on the authorisations to carry out, on the execution of the transaction.

Any person who carries out transactions and/or transactions involving sums of money, goods or other valuables belonging to the Company, must act upon authorization and provide on request all valid evidence for its verification at all times.

Each company department is responsible for the truthfulness, authenticity and originality of the documentation produced and the information provided in carrying out the activity within its competence.

Respect for the principles of fairness, transparency and good faith in relations with all contractual partners must be ensured.

The assignments given to any service companies and/or natural persons who take care of the economic/financial interests of the Company must be drawn up in writing, with an indication of the contents and economic conditions agreed. Any derogations must be duly authorised and justified.



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With regard to the commercial/professional reliability of suppliers and partners, all necessary information must be requested and obtained in order to assess the ethical reputation/reliability of the contractual partner (e.g. Model 231, Certifications, Legality ratings, etc.).

### 6.2 PURCHASES OF GOODS AND SERVICES AND OUTSOURCING OF ADVICE

Employees and subjects who make any purchase of goods and/or services, including the award of external consultancy, on behalf of the Company, must act in compliance with the principles of transparency, fairness, economy, quality, inerency and lawfulness and operate with the diligence of the good father of the family, and in compliance with the specific internal procedures and/or regulations of the Company.

In addition, these entities must undertake to:

- select the consultants on the basis of the procedures in force, in compliance with the criteria of seriousness and competence of the professional and conferring on the same assignments by contract/ formal assignment letter;
- define as much as possible the exact content of the performance and any design outputs so as to allow the verification of the performance even after the event;
- duly archive all documentation, in particular the final version of documents, including correspondence;
- deliver to the consultant the Company's Code of Ethics, acquire a formal commitment to comply with the requirements contained in it and include in the consultancy contracts a specific clause of compliance with the Code of Ethics, in order to sanction any conduct contrary to company ethical principles;
- not to pay or offer, directly or indirectly, material payments and benefits of any entity to influence or compensate an act of their office;
- not to implement illegal practices and conduct, collusive, illegal payments, attempts at corruption and favouritism;
- avoid exchanging courtesy gifts or acts of hospitality that do not have an eminently symbolic value;
- not to pay compensation that is not justified by the type of assignment or in local practice.

It is forbidden to give or promise money or any other utility to directors, general managers, managers responsible for the preparation of corporate accounting documents, auditors, liquidators or subjects subject to the management or supervision of the latter, belonging to companies or consortia of customers, business partners, certifiers, consultants, service providers, suppliers in general, etc. which may result in a breach of duty and loyalty by the corrupt party.

Appointed suppliers are required to comply with and apply local laws and regulations on employment contracts, health and safety, harrassment in all its forms, sustainable purchasing, commercial and environmental regulations. In the event of a violation, Cromaplast reserves the right to reconsider the relationship with the supplier.

### 6.3 MANAGEMENT OF IT SYSTEM



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The Company condemns any conduct consisting in the alteration of the functioning of a computer or telematic system or in access without right to data, information or programs contained therein, aimed at providing the Company with an unfair profit to the detriment of the State.

As part of the performance of its activities, the Company's Personnel has the obligation to use the tools and IT or telematic services in full compliance with current regulations (in particular in the areas of cybercrime, cyber security, privacy and copyright) and internal procedures.

The following shall also be prohibited:

- install, download and/or use computer programs and tools that allow to alter, counterfeit, falsely certify, suppress, destroy and/or conceal public or private computer documents;
- install, download and/or use computer programs and tools that allow the unauthorized introduction into computer systems or telematics protected by security measures or that allow the permanence (without having permission) within them, in violation of the measures taken by the data controller or programme holder to protect or keep confidential;
- find, disseminate, share and/or communicate abusively codes, passwords, access keys, or other suitable means to allow the conduct referred to in the previous two points;
- use, retrieve, disseminate, share and/or communicate how equipment, devices or computer programs are used to damage or interrupt a computer or telematic system;
- use, retrieve, disseminate, install, download, share and/or communicate how computer equipment, devices or programs are used to intercept, prevent or unlawfully interrupt computer or telematic communications, even if they exist between several systems;
- intercept, prevent or interrupt communications related to one or more computer or telematic systems. Any form of disclosure, even partial, to third parties of the content of the information intercepted is also prohibited. It is also prohibited to install equipment to prevent, intercept or interrupt such communications.
- any use of software without the license and trademark SIAE, not compliant with copyright and copyright regulations.
- misuse or unlawfully interfere with computer applications, tools or programs or telematics to manage and/ or allow access to physical or virtual payment instruments, even if not owned by the Company (e.g., internet banking programs; e-commerce platform);
- any modification or adaptation of applications, programs and software not duly authorized;
- use computer applications, systems or programs or telematics in the absence of the necessary authorizations and/ or for purposes other than those for which they are intended, and especially for the purpose of committing any type of crime;
- destroy, deteriorate, delete, render useless totally or partially, alter or delete data or computer programs of others or serious obstacle to their operation;
- use, install, download and/or communicate techniques, computer programs or tools that allow you to modify the server field or any other information related to it or that allow you to hide the sender's identity or change the settings of the computer tools provided by the Company;
- use computer applications, systems or programs or telematics in the absence of the necessary authorizations and/ or for purposes other than those for which they are intended, and especially for the purpose of committing any type of crime;





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- falsify, in form or content, public or private computer documents. Any use of false computer documents, as well as the suppression, destruction or concealment of genuine documents, is also prohibited;
- "Computer document" means any computer representation of legally relevant acts, facts or data;
- misuse computer systems protected by security measures and for which the necessary authorisations are not available or remain in the system against the express or tacit will of the system owner;
- illegally procure or disseminate access codes to computer systems; damage information, data and computer programs that are part of the company's assets.

### 6.4 USE OF BANKNOTES, PUBLIC CREDIT CARDS, STAMP VALUES

The Company, sensitive to the need to ensure fairness and transparency in the conduct of business, requires that the Recipients comply with current legislation on the use and circulation of coins, public credit cards and stamp values, and therefore severely penalises any conduct aimed at the illegal use and circulation of credit cards, stamps, counterfeit coins and banknotes.

### 6.5 MANAGEMENT OF NON-CASH PAYMENTS

The recipients of this Code are required to comply with the company's rules and procedures regarding the management of receipts, payments and the use of corporate credit cards.

Any person who can be traced back to the Company and who receives banknotes or coins or credit cards for payment is required to verify their compliance and legal requirements and, if false, to inform their superior or the Supervisory Body, to make appropriate complaints.

The following shall also be prohibited:

- use any type of payment instrument available or accessible because of the activity provided for the company in a different way to the indications and instructions received for this purpose;
- misuse credit or payment cards or any other similar document enabling the withdrawal of cash or the purchase of goods or the provision of services; or any other non-cash payment instrument.

### 6.6 MANAGEMENT OF CUSTOMS COMPLIANCE

The Company undertakes in the case of purchase of goods with non-EU origin to fulfil in timely terms the obligations arising from customs legislation (e.g. customs duties, border duties, etc.)

### 6.7 INSTRUMENTS AND SIGNS FOR THE RECOGNITION AND PROTECTION OF COPYRIGHT

The Company safeguards intellectual property rights, including copyrights, patents, trademarks and recognition marks, by following the policies and procedures provided for their protection and respecting the intellectual property of others, in every activity of the Company also with reference to the management of corporate marketing.

The Company prohibits any conduct aimed at causing the loss, theft, unauthorized dissemination or misuse of its intellectual property or other people's or confidential information. To this end, the Company undertakes to activate all the methods of preventive and subsequent control necessary for the purpose,





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ensuring compliance with the legislation on copyright, as well as on the protection of recognition marks, such as trademarks and patents. The Company also stigmatizes the extraction, reproduction of data, the presentation in public, etc. of the contents taken from databases, as well as the use of the same for different purposes for which they were established and, in any case, contrary to the provisions of copyright law.

The Company condemns any conduct for the purpose of unlawfully seizing business secrets, supplier lists and other information relating to the economic activity of third parties.

Is therefore the unauthorised reproduction of software, documentation or other copyrighted material is prohibited and at the same time, the Recipients of this Code undertake to respect the restrictions specified in the licensing agreements relating to the production/ distribution of third-party products, or those stipulated with their software suppliers.

Is also prohibited the use or reproduction of software or documentation outside the scope of each of those license agreements.

### 6.8 TERRORISM AND SUBVERSION OF THE DEMOCRATIC ORDER

The Company requires compliance with all laws and regulations that prohibit the conduct of terrorist activities as well as subversion of the democratic order, therefore it also prohibits the mere membership of associations with such purposes.

The Company prohibits the use of its own resources to finance and carry out any activity intended to achieve terrorist objectives or subversion of the democratic order, and undertakes to take the most appropriate control and supervisory measures in order to prevent any possible conduct leading to the commission of such offences.

Is furthermore, there is an express prohibition on any employee, wherever operating or stationed, to become involved in any practice or other action suitable to integrate terrorist conduct or subversion of the legal system.

In case of doubt or if a situation appears to be equivocal, each employee is required to address in advance to his or her Manager of function as well as to the ODV.

### 6.9 PROTECTION OF INDIVIDUAL PERSONALITY

The Company condemns any possible conduct aimed at the commission of crimes against the individual personality, such as, for example, reduction or maintenance in slavery or servitude, child prostitution, child pornography, detention of pornographic material, tourism initiatives aimed at the exploitation of child prostitution, etc. and undertakes to take the appropriate supervisory measures to prevent the commission of such crimes.

### 6.10 ACTIVITIES FOR THE PURPOSE OF RECEIVING, LAUNDERING, USING ILLICIT MONEY, GOODS OR UTILITIES AND OF SELF-LAUNDERING

The Company carries out its activities in full compliance with the current anti-money laundering regulations and the provisions issued by the competent Authorities.

In compliance with the applicable legislation, the Company undertakes to avoid carrying out suspicious transactions in terms of correctness and transparency and to verify in advance the information available



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to customers, suppliers, external collaborators and agents, in order to verify the respectability and legitimacy of their activities.

All Recipients undertake to operate in such a way as to avoid implications in operations that are also potentially suitable to encourage money laundering from illegal or criminal activities.

Each Recipient who carries out, on behalf of the Company, transactions and/or transactions involving sums of money, goods or other economically assessable utilities must act upon authorization, provide on request all valid evidence for its verification at all times.

The monitoring of the financial flow from the Group's companies and/or third parties with respect to the same and aimed at the investments necessary for the conduct of the business and/or on the occasion of the capital increases by the partners, in order to ensure proper identification of the source of the stock.

Collections and payments must be made through bank and/or cheque provisions issued with the non-transferability clause.

There is also an obligation on all Recipients to:

- do not accept money if there is even the doubt of its illicit origin/uncertain;
- not to accept goods and/or services and/or other utilities against which there is no properly authorized order/contract;
- do not make or accept cash payments equal to or greater than 2,000.00 euros (payments made in several solutions of smaller amount but concerning the same supply and resulting in a total of 2,000.00 euros are also relevant).

The staff working on behalf of the Company is also required to:

- a. to verify as far as possible in advance the information available on users, counterparties, partners, suppliers and consultants, in order to assess the reputation and legitimacy of the business before establishing any relationship with it that involves obtaining assets or sums of money;
- b. to work in such a way as to avoid any relationship, where there is even doubt, aimed at encouraging money laundering arising from illegal or criminal activities, acting in full compliance with the regulations on primary and secondary money laundering and the internal control procedures established for this purpose.

In particular, it is mandatory:

- draw up in writing - with the indication of the contents and the agreed economic conditions - the assignments given to any service companies and/or natural persons who take care of the economic/financial interests of the Company;
- ensure, by the competent functions, specific checks on the regularity of payments to all counterparties and to verify the coincidence between the person in whose name the order is made and the person collecting the relevant sums;
- diligently comply with the minimum requirements set and required for the selection of the subjects offering the goods and/or services that the Company intends to acquire;
- establish criteria for the evaluation of tenders on the basis of the commercial and professional reliability of the suppliers and to request and obtain all the necessary information;
- ensure maximum transparency in case of conclusion of agreements/joint ventures aimed at the realization of investments.



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### 6.11 TRANSNATIONAL ACTIVITIES AND PROTECTION AGAINST ORGANISED CRIME

The Company condemns any conduct carried out, both on the national territory and at the transnational level, by subjects who play a leading or subordinate role, which may even indirectly facilitate the establishment of criminal offences such as criminal association, mafia-type association and obstruction of justice.

The Company undertakes to activate all methods of preventive and subsequent control necessary for this purpose (verifiability, traceability, monitoring, segregation of duties, etc.), in order not to maintain relations with subjects belonging to such associations.

The Company also undertakes to control any form of internal association in order to prevent the occurrence of associative phenomena of an internal matrix aimed at engaging in unlawful conduct and that use the means for these purposes, resources and assets.

Finally, the Company promotes development and legality within the territorial areas in which it operates; therefore, it promotes participation in any memorandum of understanding (or similar pacts) defined between public entities, enterprises, trade associations and trade unions, aimed at preventing criminal infiltration.

Business relationships must be maintained only with customers, collaborators, partners, suppliers and contractors of a certain reputation, who carry out lawful commercial activities and whose proceeds derive from legitimate sources. To this end, there are rules and procedures that ensure the correct identification of customers and the appropriate selection and evaluation of suppliers or partners to work with.

All the necessary control tools are adopted so that the decision-makers act and decide through codified rules and keep track of their work (i.e. meeting minutes, reporting mechanisms, etc.).

### 6.12 COMPETITION PROTECTION

The Company and all Recipients undertake to comply with antitrust regulations (which prohibit conduct aimed at limiting competition) and to avoid any unfair action against commercial counterparties (e.g. sabotage, falsification of technical, commercial and accounting documents and, in general, any scheme of fraud).

The Company undertakes not to undertake in any case aggressive or deceptive commercial policies, aimed at conditioning the consumer in the purchase of its product through any form of physical intimidation or by false product communication that misleads the customer.

The Company recognises and promotes the value of free competition in a market economy as a decisive factor for growth, and is therefore committed to operating in compliance with Community and national principles and laws protecting competition. The Company intends to protect the value of fair competition by refraining from collusive and predatory behaviour.

It shall be prohibited to enter into agreements with competitors on prices and the way in which services are provided which may adversely affect free competition.

The Company's conduct towards competitors is guided by the principles of loyalty and fairness and, Consequently, it stigmatizes and disapproves of any conduct which may constitute an impediment or



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disturbance to the operation of a business or trade or which may be linked to the commission of any of the offences against industry and trade.

The Company undertakes not to engage in unlawful or otherwise unfair conduct for the purpose of seizing trade secrets, supplier lists, or information relating to infrastructure or other aspects of the economic activity of third parties.

Furthermore, the Company does not employ employees from competing companies for the sole purpose of obtaining confidential information, nor does it induce the personnel or customers of competing companies to disclose information that they cannot disclose.

Commercial initiatives such as exclusive agreements, captive purchases, etc. must be authorised by the Head of the Department involved, in sharing with the Corporate Summit.

During meetings with competitors in the event of events, meetings, etc. organized by trade associations as well as on all occasions of exchange of information with competing companies (e.g. consortia). Any conduct which may be regarded as preparatory to activities adversely affecting free competition shall be prohibited.

All Recipients are expressly prohibited from:

- use violence on things or use fraudulent means to hinder the industrial or commercial activity of others;
- to engage in industrial, commercial or otherwise productive activities in a competitive manner using violence or threats;
- to carry out suitable activities to the detriment of national industries by selling or otherwise putting into circulation, on domestic or foreign markets, industrial products with counterfeit or altered names, marks or distinctive signs;
- to deliver to the purchaser, as part of and/or in the course of a commercial activity, a movable thing for another (aliud pro alio) or a movable thing that by origin, origin, quality or quantity is different from that declared or agreed;
- sell or otherwise put into circulation works of genius or industrial products bearing names, marks or distinctive signs - domestic or foreign - likely to mislead the buyer on the origin, origin or quality of the works themselves or the product;
- manufacture or use industrially objects or other goods manufactured by usurping or infringing the title of industrial property, while being able to know the existence of the same, and try to profit from the above goods by introducing them into the territory of the State, holding and/or putting them up for sale or putting them into circulation.

### 6.13 ENVIRONMENTAL PROTECTION AND SAFETY

The Company considers the environment a primary asset and promotes the protection and respect by all employees or collaborators in any capacity, customers, suppliers and partners.

The corporate choices are always oriented to ensure the greatest possible compatibility between economic initiative and environmental needs, not limited to simple compliance with current legislation, but with a view to sustainable synergy with the territory, the natural elements and the health of workers.



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The Company monitors the environmental impacts of its activities and systematically seeks their improvement in a coherent, effective and sustainable manner.

The Company is committed to conducting all its activities in compliance with the Principles of Environmental Sustainability, acting through concrete choices, (eg: preference towards suppliers who demonstrate the best performance in terms of Sustainability).

Where, for the purpose of fulfilling the obligations in the field of environmental protection, it is necessary to resort to the intervention of authorised subjects (disposers, transporters, etc.), the latter are chosen from those that have the highest reliability requirements, professionalism and ethics.

Employees, collaborators, directors, partners, partners and external service providers, as part of their duties, participate in the process of risk prevention, environmental protection and health and safety protection for themselves, of colleagues and third parties.

In particular, CROMAPLAST S.p.A. also through the active collaboration of its employees, collaborators, agents, directors, partners, external service providers:

- promote and implement any reasonable initiative aimed at minimising risks and removing causes that may endanger the safety and health of persons, excluding any form of exception or derogation from internal procedures adopted for this purpose;
- pays continuous attention and commitment to improving its environmental performance, minimizing the negative impact on the environment and operating a conscious and responsible use of natural resources;
- collaborates with its stakeholders, both internal (e.g. employees) and external (e.g. institutions), to optimize the management of profiles related to Health, Safety and Environment;
- maintains high standards of safety and environmental protection in compliance with current legislation;
- adopts a policy of using products compatible with the protection of the environment and the safety of workers.
- transmit and request to receive all the information, documentation and certifications necessary to ensure full compliance with mandatory legislation, with particular reference to safety and hygiene in the workplace, environmental protection, proper management of labor relations.

Decisions on health and safety at work are taken by the Company on the basis of some fundamental principles and criteria, set out in international and national regulations, and in particular in Legislative Decree 81/2008 and ss.mm. These principles and criteria can be summarised as follows:

- avoid the risks;
- assess risks that cannot be avoided;
- combating risks at source;
- adapting work to man, for example in the design of workplaces, the choice of equipment and working methods;
- take account of the degree of technical development;
- replace what is dangerous with what is not dangerous or less dangerous;
- plan prevention, aiming at a coherent complex that integrates technology, work organization, working conditions, social relations, and the influence of factors in the working environment;
- prioritising collective protection measures over personal protection measures;
- give appropriate instructions to workers;



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- provide an accurate system of training and information to and from employees, collaborators, agents, members, directors, corporate bodies, partners, contractors, suppliers in general;
- ensure, in any case, the adoption of all the measures which, according to the particularity of the work, experience and technique, are necessary to protect the physical integrity and moral personality of the workers.

### 7. PRINCIPLES RELATING TO CORPORATE WRONGDOING

#### 7.1 MANAGEMENT OF THE COMPANY'S ACCOUNTING, CAPITAL AND FINANCIAL DATA AND INFORMATION

The Company condemns any conduct by anyone engaged in to alter the correctness and truthfulness of the data and information contained in the financial statements, reports or other social communications required by law, directed to members and the public.

All the subjects called to the formation of the aforesaid acts are bound to verify, with the due diligence, the correctness of the data and the information that will be then received for the drafting of the aforementioned acts.

All budget items, the determination and quantification of which presupposes discretionary assessments of the Functions in charge, must be supported by legitimate choices and appropriate documentation.

#### 7.2 RELATIONS WITH THE COMPANY'S SUPERVISORY BODIES

The Company requires all its personnel to observe correct and transparent conduct in the performance of their duties, especially in relation to any request made by the members, the Board of Statutory Auditors and the other corporate bodies in the exercise of their respective control functions.

#### 7.3 PROTECTION OF THE COMPANY'S ASSETS

It is forbidden to engage in any conduct aimed at causing an injury to the integrity of the social heritage.

#### 7.4 PROTECTION OF THE COMPANY'S CREDITORS

Is prohibited any conduct leading to the reduction of the share capital or merger with another company or division in order to cause damage to creditors.

#### 7.5 CONFLICT OF INTERESTS OF ADMINISTRATORS

Each director shall be obliged to make known to the other directors and to the board of statutory auditors any interest, whether on his own or on behalf of a third party, in a given transaction of the company on which he is to decide. This communication must be precise and precise or must specify the nature, terms, origin and scope of the interest itself; it will then be up to the Board of Directors and the Board of Statutory Auditors to assess its conflict with the interests of the Company.

#### 7.6 INFLUENCE ON THE GENERAL MEETING

It is forbidden to carry out any act, simulated or fraudulent, aimed at illegitimately influencing the will of the members of the general meeting to obtain the irregular formation of a majority and/or a resolution different from that which would otherwise have been taken.



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### 7.7 DISSEMINATION OF FALSE INFORMATION

Is prohibited to disseminate false information both inside and outside the Company, concerning the Company itself, its employees, consultants, collaborators and third parties working for it.

### 7.8 RELATIONS WITH BANKING OPERATORS

In its relations with banking operators, the Company's activities must comply with the following principles of control:

- respect of the roles and responsibilities defined by the company organization chart, and the authorization system with regard to the management of relations with financial/banking operators;
- fairness and transparency in relations with banking institutions, in compliance with the principles of good management and transparency;
- integrity, impartiality and independence, not improperly influencing the decisions of the other party and not requiring preferential treatment (prohibition of promising, giving or receiving favors, sums and benefits of any kind);
- completeness, accuracy and veracity of all information and data transmitted to banking institutions.

### 7.9 RELATIONS BETWEEN PRIVATE INDIVIDUALS

Recipients of this Code of Ethics are prohibited from:

- make cash donations or grant other advantages of any nature (promises of hiring, use of business assets, etc.) to representatives (apical or subordinate) of other private companies to obtain any advantage for the Company;
- to provide services or to grant benefits of any kind to members of Business Partners and/or consultants who are not adequately justified in the context of their relationship with them;
- recognize compensation or other advantages of any kind in favor of Agents/ Freelancers who do not find adequate justification in relation to the type of task to be performed and the practices in force at local level;
- make cash donations or recognize other benefits in favour of its suppliers, which are not adequately justified in the context of the relationship established with them or which may lead to an undue advantage for the Company;
- receive advantages of any nature, exceeding normal commercial practices or courtesy, or otherwise intended to acquire undue preferential treatment in the conduct of any business, in exchange for the payment of money or benefits of all kinds.

## 8. CONFIDENTIALITY AND PROTECTION OF PRIVACY

All information and documents learned in carrying out activities in favour of the Company are confidential.

In carrying out its activities, the Company collects, manages and processes personal data in compliance with current legislation.

The Company, therefore, undertakes to comply with the mandatory requirements set out in the legal and regulatory provisions on the protection of personal data and to adopt a system of privacy management that allows you to have an organizational model and control of risks arising from the processing of personal data.





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The privacy of the employee and the collaborator is protected by adopting standards that specify the information that the Company requires from the subject and the related methods of processing and storage, to ensure maximum transparency for the persons concerned and inaccessibility to third parties, except for justified and exclusive reasons of work.

Therefore, for all employees of the Company, and for those who operate in the name and on behalf of the Company, there is an obligation of confidentiality of the data and information referred to, by reason of their assignment, are in possession of, and are prohibited from disclosing, such information voluntarily or unintentionally. By way of example, those relating to management plans, production processes, products and systems developed or otherwise managed and/or maintained, as well as those relating to negotiated and insolvency procedures, shall be considered as such, in addition to all data bases and information and data relating to personnel (below, for brevity, also only "Information").

Is any processing of data with the purpose of carrying out surveys on the ideas, preferences, personal tastes and, in general, the privacy of the collaborators.

Is in addition, the prohibition, subject to the hypotheses provided by law, to communicate/ disseminate personal data without the prior consent of the data subject.

It is forbidden to carry out data processing in violation of current legislation on the protection of privacy.

As regards the processing of data on paper and through the use of computer systems,

is obligation to comply with the particular security measures in place to prevent the risk of external intrusion, such as controls on access to premises, passwords, personal identification code, screen savers, and leaks, even accidental, of data.

The security measures are arranged with specific instructions given by the Data Controller. Violation of privacy rules may result in disciplinary action being taken in relation to the extent of the breach.

All documents of the Company must be stored in compliance with the internal provisions and in the measures adopted by the Company for data security.

### 9. SUPERVISOR BODY

The Supervisory Body is responsible for monitoring and updating the Organisation, Management and Control Model and this Code of Ethics.

The Supervisory Body in the exercise of its functions has free access to company data and information useful for the performance of its activities.

The corporate bodies and their members, employees, consultants, collaborators and third parties acting on behalf of the Company, are required to cooperate as much as possible in facilitating the performance of the functions of the Supervisory Body.

### 10. SANCTIONS

Non-compliance with the principles contained in this Code may result in the application of the sanctions contained in the Company Disciplinary System within the limits and according to the specific procedures provided for therein. The gravity of the infringement will be assessed on the basis of the following circumstances:





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- the timing and practical arrangements for implementing the infringement;
- the presence and intensity of the intentional element;
- the extent of the damage or danger as a result of the infringement for the Company and for all employees and stakeholders of the Company itself;
- predictability of consequences;
- the circumstances in which the infringement took place.

Recidivism is an aggravating circumstance and involves the application of a more serious sanction.

The Disciplinary System is an integral part of the Organization, Management and Control Model adopted by the Company.

### 11. REPORT VIOLATIONS

In the event of news of possible violations of this Code and/or of the operating procedures that make up the Model or of other events that may alter its value and effectiveness, each person must contact their Manager, who will report to the relevant Management or, if this is not possible for reasons of expediency, directly to the Corporate Summit. In any case, the breach must also be promptly reported to the Supervisory Body.

Not reporting a violation of this Code can be considered a form of participation in the violation itself.

It is not allowed to conduct personal investigations or report news to other subjects than those specifically appointed.

Acts of retaliation or discrimination, direct or indirect, against whistleblowers shall be prohibited for reasons directly or indirectly linked to the disclosure. The Company therefore guarantees that no retaliation will be made by the Company following the report.

Since relations between the Recipients, at all levels, must be based on criteria and behaviours of fairness, loyalty and mutual respect, the Company sanctions the abuse of the duty of information, regulated here, for the mere purpose of emulation or retaliation.

The Recipients may contact the Supervisory Body, through the communication channels dedicated to this, as indicated in the Model (General Part), to which reference is made.

Reports received by the Supervisory Body, through any channel, are examined and processed by the latter with the utmost confidentiality. Likewise, each Recipient must fully cooperate in any investigation of violations of the Code, while maintaining the strictest confidentiality of the existence of such investigations.

### 12. KNOWLEDGE

This Code is brought to the attention of the Corporate Bodies and their members, employees, consultants, collaborators and any other third party that may act on behalf of the Company. All these subjects are required to learn its contents and to respect its precepts.

Any application doubts related to this Code must be promptly submitted and discussed with the Supervisory Body.

### 13. FINAL DISPOSITIONS



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### 13.1 CONFLICT WITH THE CODE

In the event that even one of the provisions of this Code of Ethics conflicts with the provisions set out in the internal rules or procedures, the Code shall prevail over any of these provisions.

### 13.2 CODE CHANGES

Any amendment and/or addition to this Code of Ethics must be made and approved in the same manner as those adopted for its initial approval.



Cromaplast s.p.A.

AUTOMOTIVE EXTERIORS

I.MOD.014.0013

Rev 005

24/09/2024

## Cromaplast Ethic Code

### DECLARATION OF ACCEPTANCE

I, the undersigned, have received my personal copy of this Code of Ethics approved by the Company on 03/04/2023.

I also declare that I have understood, accepted and intend to respect the principles and rules of conduct contained in this Code.

Finally, I undertake to conform my behaviour to the rules set out in this Code, acknowledging the responsibilities associated with violations of these rules.

Signed: \_\_\_\_\_

First name and printed surname \_\_\_\_\_

Date \_\_\_\_\_