

# ICAIPLAST SPA

## CODE OF ETHICS

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## 1. CODE OF ETHICS

### 1.1. INTRODUCTION

This Code of Ethics aims to clarify the principles and values pursued by society and witnessed in more than 50 years of life.

In order for social activity to function properly and for the name and image of society to be safeguarded, all those acting on behalf of society must act in accordance with the principles of honesty, integrity and transparency, compliance with the law and internal regulations, fair competition and respect for persons.

The Directors, the Representatives of the Collegiate Bodies, the Employees and all those who work for ICAIPLAST SPA are required to know and comply with the provisions contained in this Code of Ethics.

### 1.2 - SCOPE AND RECIPIENTS

The principles and provisions of this Code of Ethics are examples of conduct that respects the general obligations of diligence, fairness and loyalty, which qualify the performance of work and behaviour in the workplace.

The principles and provisions of the Code are binding on Directors, Members, Employees and all those who in any way work for the organization.

All these are henceforth called "Recipients".

The violation of the provisions of the Code, regardless of the outcome of any criminal judgment, involves the application of disciplinary sanctions.

The type and extent of penalties shall be graduated in relation to the subjective element of the conduct (wilful misconduct, fault), the relevance of the infringed obligations, the level of hierarchical responsibility, the possible sharing of responsibility with other parties, the presence of aggravating or mitigating circumstances.

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### *1.3 - COMMUNICATION*

The organization shall inform all Recipients about the provisions and the application of this Code, recommends compliance.

### *1.4 - LIABILITY*

Each Recipient carries out its work and its performance with diligence, efficiency and fairness, making the best use of the tools and time at its disposal and assuming the responsibilities related to the fulfillment, in compliance with current legislation, procedures and competences established by the company.

Recipients, in compliance with current legislation, must not have behaving contrary to the Code and must promptly report the following information:

- any information regarding the violation, or possible violation, of the provisions contained in the Code;
- any request for violation of the Code has been submitted to them.

The reports must be made by e-mail to [info@pec.icaiplast.it](mailto:info@pec.icaiplast.it), and may object to any violation or suspicion of violation of the Code of Ethics.

The reports received will be evaluated with discretion and responsibility, avoiding any form of retaliation, penalization or discrimination for whistleblowers, and will activate all the insights deemed necessary.

It is the task of the management and its collaborators to make their colleagues and collaborators understand the importance and respect of the provisions contained in the Code.

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### 1.5 - ETHICAL PRINCIPLES

The fundamental ethical values of the organization, to which the Recipients must be inspired, are the following:

#### Legality

All the recipients of this document are required to comply with the current legislation of the Code and internal rules; in no case can the pursuit of the interest of the company justify an action that does not conform to them.

#### Loyalty

All activities, internal and external, must be marked by the utmost loyalty and integrity, operating with a sense of responsibility, in good faith, establishing correct professional and commercial relationships, paying attention to the growing and safeguarding of the company's assets.

#### Trasparency

All actions and relations with counterparties shall be carried out in accordance with the applicable regulatory requirements and industry best practice.

#### Impartiality

ICAIPLAST SPA, in both internal and external relations, avoids any form of discrimination based on age, sex, sexual orientation, health, race, nationality, political and trade union opinions, religious beliefs.

#### Diligence and professionalism

The Recipients diligently carry out their professional services, operating in the interest of society and pursuing objectives of effectiveness and efficiency.

#### Fairness

All the actions and operations carried out and the conduct of each of the Recipients, in the performance of the function or assignment, are inspired by the legitimacy under the formal and substantial aspect, according to the current rules and internal procedures, and fairness, cooperation, loyalty and mutual respect.

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The Recipients do not use for personal purposes information, goods and equipment, which they have in the performance of the function or assignment.

Employees limit to cases of absolute necessity the possible use for personal reasons of telephone equipment, copiers and computers, even in the event of receiving communications.

The Recipients perform the services for the company using only services and goods - tangible and intangible - lawfully owned; in particular, staff shall avoid installing or otherwise using computer programs not licensed in the name of the company.

Each Recipient does not accept, or make, for itself or for others, any pressure, recommendation or report, which may be detrimental to society or undue advantage for itself or for third parties; each Recipient, Likewise, rejects and does not make promises of undue offers of money or other benefits.

In the event that he receives illegitimate pressure or is offered gifts, benefits or other utilities exceeding a modest value, the Recipient is required to give timely communication to the management.

#### *1.6 - CONFLICT OF INTEREST*

The Recipients pursue, in the performance of their activities, the objectives and general interests of the company.

The Recipients inform without delay, taking into account the circumstances, their superiors or contact persons of situations or activities in which they may have interests in conflict with those of the company (or their relatives or relatives) and in any other case where there are relevant reasons of convenience.

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### 1.7 - *PRIVACY*

The Recipients ensure the utmost confidentiality with regard to news and information constituting the company's assets or relating to the company's activities, in compliance with the provisions of law, current regulations and internal procedures.

The Recipients undertake to protect information relating to Employees, Directors and Collaborators, generated or acquired within the corporate structure and to avoid any misuse of such information.

### 1.8 - *BUSINESS RELATIONS*

The company is inspired by the principles of legality, loyalty and fairness.

The individual and collective behavior of the Recipients in the pursuit of the objectives and in the conclusion of any transaction - always relevant to the object of the company - must be carried out in compliance with national and international laws, the ethical values of society and be in tune with internal policies.

Fraudulent practices and behaviour, acts of corruption and favouritism are prohibited in professional and commercial relations.

### 1.9 - *PROTECTION OF COMPETITION*

ICAIPLAST SpA considers that the principle of free competition constitutes:

- fundamental condition for the orderly development of the activity;
- element of economic benefit and choice for users;
- guarantee of cultural and ideological pluralism.

and therefore to this principle inspires its activity.

### 1.10 - *CUSTOMER RELATIONS*

Customer relations should be guided by the following principles:

- compliance with existing internal procedures and regulations;
- compliance with commitments and obligations;
- truth and congruity in outward communications.

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#### 1.11 - RELATIONS WITH SUPPLIERS

The selection of suppliers and the determination of the conditions of purchase are based on an objective assessment of the skills, competitiveness, quality and price of the good or service, as well as guarantees of assistance and timeliness.

In the context of relations with suppliers, Recipients are required to:

- establish efficient, transparent and collaborative relations, maintaining an open and frank dialogue in line with best business practices;
- obtain the collaboration of suppliers in ensuring the most convenient relationship between quality, cost and delivery times;
- require application of the contractual conditions;
- require suppliers to comply with the principles of this Code of Ethics;
- operate within the framework of current legislation and require timely compliance.

It should be required, by way of example, that suppliers don't use child labour, from discrimination, abuse and coercion to the detriment of workers and that they comply with environmental legislation, adopting policies to limit the consumption of raw materials, reducing waste and harmful emissions and generally limiting the environmental impact of production.

Any potential supplier with the necessary requirements must be considered and evaluated.

If the supply concerns protected works of genius, specific precautions must be taken for the respect of copyright (purchase, management, use, resale or redistribution, etc.).

Recipients may not receive, promise, offer or pay, directly or indirectly, sums of money or other benefits, in order to influence suppliers in the performance of their duties and/or to take undue advantage.

Homages, courtesy and hospitality to and from suppliers are not allowed, unless they are gifts or utility of use of modest value.

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The violation of the principles of legality, correctness, transparency, confidentiality and respect for the dignity of the person are just cause of resolution of relations with suppliers.

#### *1.12 - RELATIONS WITH THE STAFF*

In the context of relations with Collaborators, Recipients are required to:

- select counterparties with adequate professional and moral qualifications;
- establishing efficient, transparent and collaborative relationships;
- require the application of the correct contractual conditions;
- require Collaborators to comply with the principles of this Code of Ethics;
- operate within the framework of current legislation and require timely compliance.

#### *1.13 – RELATION WITH PUBLIC INSTITUTION AND PUBLIC ADMINISTRATION*

Relations with local, national or Community public institutions, as well as with public officials or public service operators or employees of public bodies, are maintained by the Recipients in compliance with current legislation and on the basis of the general principles of fairness and loyalty.

In the specific case of the execution of a tender launched by public institutions or by the Public Administration, the Recipients must operate in compliance with the law and the correct commercial practice. In relations with public institutions and public administration, the parties involved are required to the rules of transparency, clarity, professionalism and fairness, in order to establish a relationship of maximum collaboration.

Recipients are prohibited from promising, offering or paying, directly or indirectly, sums of money or other benefits, in order to influence the representatives of public institutions or public administration, in performing their duties and/or profiting unduly.

Homages, acts of courtesy and hospitality are not allowed, unless they are of modest value.



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#### *1.14 - HEALTH, SECURITY, ENVIRONMENT*

ICAIPLAST SPA has always been inspired by the principle of protection and protection of health and the environment, giving considerable resources of time, financial and structures, in order to avoid the occurrence of any occupational disease and/or occupational accidents.

The objective was and is pursued by the different business functions involved, maintaining and further refining the following processes:

with regard to health and safety:

- pursuit of prevention policies, carried out through the appropriate structures provided by current legislation;
- continuous search for organizational, technical, environmental improvement solutions.

The company is committed to equip itself with specific models of organization, management and control in terms of health and safety at work in accordance with current regulatory parameters.

with regard to the environment:

- timely compliance with current environmental legislation in each activity;
- careful and rigorous management, through specialised companies, of the disposal of special waste and the consequent organisational/administrative burden;
- constant improvement of the materials used;
- reduction of energy consumption and costs.

#### *1.15 – RESPECT OF THE PEOPLE*

Respect for and appreciation of the person in every respect are part of the historical heritage of society.

The management of human resources is also based on respect for each person.

Internal and external relations shall not include any discrimination based on political or trade union opinions, religion, racial or ethnic origin, nationality, age, sex, sexual orientation, state of health and generally any intimate characteristic of the human person.

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It must therefore reject any form of discrimination or lack of respect or harassment, while a suitable policy must be pursued to promote and develop the professional skills and competences of each Recipient while maintaining an internal climate respectful of the dignity and personality of the individual and avoiding the creation of a working environment hostile or isolating individuals or groups of workers.

#### *1.16 - ACCOUNTING CONTROL AND TRANSPARENCY*

The Recipients undertake, in accordance with their respective functions and duties, to ensure that the facts relating to the management of the company are represented in a correct and truthful manner in the accounts.

Every transaction and transaction must be correctly recorded, authorised, verifiable, legitimate, consistent and fair.

All shares and operations of the company must have an adequate registration and it must be possible to verify the decision, authorisation and performance process.

Adequate supporting documentation shall be kept for each accounting recognition. This documentation shall make it possible to identify the reason for the transaction that generated the recognition and the authorisation thereof. The supporting documentation must be easily available and stored according to appropriate criteria that allow easy consultation, both by internal bodies and by external bodies entitled to control.

It is the obligation of the Recipients, always within the scope of their respective functions and duties, to check the correctness and veracity of the accounting records and to make known, to those within their competence, any errors, omissions and/or falsifications thereof.

#### *1.17 - RESPECT OF ETHICAL PRINCIPLES AND THE SANCTIONING AND DISCIPLINARY SYSTEM*

##### Collegiate Bodies

Compliance with the Code of Ethics by the Directors complements and explicitly the obligations of diligence in the execution of the task assumed.

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The violation of the rules of the Code of Ethics therefore constitute a breach of the obligations arising from the relationship of organic representation, with the consequent application of the sanctions provided for by law and/or the disciplinary and disciplinary system.

#### Employees

Compliance with the Code of Ethics by employees complements and explicitly the obligations of loyalty, loyalty and fairness in the execution of the contract of employment according to good faith and is also required by the company pursuant to and for the purposes referred to in article 2104 of the Civil Code.

In case of violation of the rules of the Code of Ethics, the sanctions provided for by the sanction and disciplinary system as per the employment contract will apply.

#### Third parties

Compliance with the Code of Ethics by the suppliers and the Recipients integrates the obligations to fulfil the duties of diligence and good faith in the negotiations and in the execution of contracts with the company.

The violation of the rules of the Code of Ethics may constitute, depending on the gravity, a just cause for the revocation or termination of contracts with all legal consequences, including compensation for damage.

Vigevano, 10 April 2023

Legal Representative

A handwritten signature in blue ink, appearing to read 'G. De Biasi'.