

CODE OF ETHICS

Constituent element of the Organization, Management and Control Model pursuant to Legislative Decree 231/2001

POLIPLAST S.R.L.
Via Del Valà 20
CARATE BRIANZA (MB)
P.iva 00905360962

Summary

The values of our corporate philosophy

Code of Ethics and Model 231

Recipients

Art. 1 – Protection of human rights

Art. 2 – Legality

Art. 3 – Transparency, fairness, integrity

Art. 4 - Transparency of corporate documents and business continuity

Art. 5 – Qualitative excellence

Art. 6 – Relations with customers

Art. 7 – Relations with suppliers

Art. 8 – Relations with the Public Administration and Certifying Bodies

Art. 10 - Equal opportunities and gender equality

Art. 11 – Company assets

Art. 12 – Know-how, intellectual property

Art. 13 – Protection of competition and the market

Art. 14 – Separation of personal interests from corporate responsibilities

Art. 15 – Confidentiality of personal data

Art. 16 – Environment and sustainability

Final provisions

Supervision of the application of the Code of Ethics

Signaling Channels

Sanctioning system

Adoption and amendments to the Code of Ethics

Conclusions

Values of our corporate philosophy

The Poliplast S.r.l. group has over 50 years of experience in the field of design and manufacture of moulds for plastic and polyurethane materials. Not only that, it has also been operating in the molding and finishing sector for over thirty years.

The experience gained and the constant attention to the evolution of new technologies, combined with quality, flexibility and price, are the foundations on which we base our relationships with our customers.

Quality and reliability characterize our products, but they are also aspects on which our relationship with the customer is based. All products are made in Italy, with TUV certification.

Thanks to Poliplast's attention to the use of innovative technologies, the company can also boast an important production evolution in its history.

Since its establishment, the company has based its corporate policy on compliance with ethical principles, legal provisions and regulations in order to consolidate its credibility in the economic context in which it operates.

The document you are reading ("Code" or "Code of Ethics") aims to recognize and highlight the founding values of the credibility now acquired by the Company in the market, also with a view to reaffirming the roots that inspire the daily actions of all Poliplast's staff. These are binding principles, which include, but are not limited to, mere compliance with the laws and regulations in force, concerning – more broadly – the correctness, transparency and integrity in the management of the company's activities.

Code of Ethics and Model 231

Over the years of activity, Poliplast has established itself in the market thanks to its expertise and precision.

Experience, high specialization and reliability guide the company's actions with the aim of being able to provide a service that is increasingly in line with the specific requests of the customer.

Through the adoption and dissemination of the Code of Ethics, the Company intends to further clarify and strengthen the operational force of these meanings, declining them into principles and rules of conduct relevant both internally and in relations with third parties.

Today, more than ever, Poliplast believes and invests with conviction in an ethic based on compliance with high quality standards and the promotion of its corporate values, to protect internal and external stakeholders.

With this project, the Company has decided to adopt an **Organisational, Management and Control Model** pursuant to Legislative Decree no. 231/2001 (hereinafter, "Model 231" or "Model") instrumental to mitigate the risk of committing crimes.

This Code of Ethics, as a '**constitutional charter**' of corporate life, is an integral part of Model 231, representing the basis of inspiration and interpretative tool for all the safeguards provided for by the Model itself.

In order to ensure the concrete implementation of the company's ethical vision, the principles and rules contained in this Code are binding, to be understood as the duty of each Recipient (see below),

to comply with the standards of conduct indicated.

In order to supervise compliance with the Code of Ethics and, more broadly, with Model 231, Poliplast avails itself of the support of a Supervisory Body, which operates within the limits and with the functions provided for by art. 6 paragraph 1 letter b) of Legislative Decree no. 231/2001.

Recipients

The principles and rules of the Code of Ethics apply to the following recipients:

- corporate bodies;
- the Company's personnel (both employees and external collaborators);
- suppliers;
- customers;
- consultants and business partners;
- in general, all those with whom the Company comes into contact during its activity.

Poliplast's Administrative Body and each person in charge of the Company's corporate functions is required to comply with the standards and corporate culture outlined in the Code of Ethics, promoting their assimilation throughout the company. Starting from the activity of defining the company's objectives and promoting company investments, as well as in the choice of business partners, as well as in the concrete implementation of projects and personnel management; generally, these are relevant principles of any management decision of the Company.

In the same way, workers are bound by the regulations defined in the Code of Ethics that must, in particular, conform both the relations existing within the Company – thus strengthening cohesion and the spirit of mutual collaboration – and the relations with third parties in contact with the Company (first and foremost, customers).

In order to promote compliance with the Code of Ethics and - in general - the ethical and organizational awareness of the Company, Poliplast provides for the maximum dissemination of this document, through publication on its website, on the company bulletin boards, as well as through the performance of training and awareness-raising activities.

The Code of Ethics is also brought to the attention of employees, the Company's business partners and anyone who has business relations, at any step, with Poliplast.

Principles and rules of conduct

Art. 1 – Protection of human rights

The commitment to human rights is a founding principle of the Code of Ethics that guides the company's activities and ethics, and is an integral part of Poliplast's policies and processes. The Company respects and promotes human rights and fundamental freedoms, in the firm belief that these principles are essential factors for authentic and sustainable development.

In particular, the Company supports, in its sphere of operation and influence, the protection of fundamental rights enshrined in the Universal Declaration of Human Rights (UN).

Art. 2 – Legality

Poliplast operates in strict compliance with the principle of legality, in compliance with the values of the democratic system.

All Recipients are, therefore, required to comply with the principles and rules of the Constitution and the laws of the Italian Republic, the regulations and directives of the European Union, acts having the

force of law (decree-laws and legislative decrees) and national regulations, as well as any internal policy and act of self-regulation, including this Code of Ethics.

With this in mind, the Company collaborates in the prevention of acts contrary to the standards outlined above, committing itself not to provide any form of financing, direct or indirect, and not to favour, in any way, groups, associations or individuals who pursue illegal purposes or in any case not aligned with the values promoted by this Code of Ethics.

Art. 3 – Transparency, fairness, integrity

Transparency, fairness and integrity are fundamental principles that inspire the entire organization and every operational expression of Poliplast. The Recipients recognize them as essential standards of their actions, internally and in relations with third parties.

All conduct carried out by the Recipients of the Code of Ethics, having relevance both internal and external to the Company, must comply with the highest standards of professional **rigour, fairness, transparency and fair competition** and any activity carried out by top management, employees and collaborators in commercial relations with third parties must comply with the **rules of fairness and good faith** deriving from Articles 1175 and 1375 of the Civil Code.

Art. 4 - Transparency of corporate documents and business continuity

The Company adopts, as fundamental values, **the principles of transparency, accuracy, truthfulness and completeness** of any corporate document in which economic, equity and/or financial elements are disclosed, in compliance with current legislation. Consequently, the corporate resources involved in the preparatory activities for the preparation of the financial statements and corporate communications undertake to carry out their functions in accordance with the above-mentioned principles.

The Company therefore condemns any conduct aimed at altering the transparency, correctness and truthfulness of the data and information contained in the financial statements, reports or other corporate communications required by law, addressed to the public, shareholders, the board of statutory auditors or the auditor.

Therefore, in the event of a request for accounting information made by shareholders, the auditor and the Supervisory Body, in the exercise of their respective institutional functions, the personnel involved are required to respond promptly, in a **complete, accurate and transparent manner**. In this regard, it is also specified that the Company must comply with current legislation on taxation in order to ensure the correct determination and settlement of taxes and undertakes to promptly carry out any tax compliance required by law, also in accordance with the practices of the **Revenue Agency (?????)**.

The Company also strives at an organizational level to identify and prevent operational, financial or other risks that may undermine business continuity. Therefore, it is necessary that the accounting records and the documents deriving from them must be based on genuine and exhaustive information and must also be accompanied by appropriate supporting documentation, easily available, necessary to carry out checks and assessments. With particular reference to cash flows, the Company's incoming and outgoing payments must always be authorised, as well as tracked and recorded and, more broadly, financial transactions must be carried out only by persons with the relevant powers. Any omission or misrepresentation of which workers become aware must be reported to the Supervisory Body without delay.

In compliance with art. 2086 paragraph 2 of the Italian Civil Code, the Company undertakes to adopt an organizational, administrative and accounting structure appropriate to the nature and size of the company, also with a view to the timely detection of the company's crisis and the loss of business

continuity.

Art. 5 – Qualitative excellence

All Poliplast staff must operate in pursuit of the highest quality standards.

The Company wants to meet the needs of customers in the best possible way, starting from the selection of raw materials and products to be marketed, and then accompanies - with care and competence - the customer in the optimal choice, finally assisting him also in the after-sales phase. All our items are certified to ensure safety and quality.

Poliplast offers only certified products for real, tangible and long-lasting quality. This is achieved by combining the strength of experience and attention to this sector innovations.

Art. 6 – Relations with customers

The Company is committed to satisfying its customers, both business and consumer, in compliance with high quality standards, conducting relationships with high professionalism, availability and fairness.

Specifically, in the context of relations with Customers, the Recipients must develop and maintain positive and lasting relationships, inspired by the canons of collaboration and courtesy, transparency and integrity, with a view to qualifying the Company as a safe and reliable partner, providing accurate, complete, truthful and timely information so as to enable the Client to make an informed decision and by fulfilling all the commitments undertaken.

Poliplast's staff is also required to require Customers to comply with the Company's ethical principles, in compliance with the provisions of the Code of Ethics.

Art. 7 – Relations with suppliers

Poliplast selects and maintains business relationships with suppliers able to share the quality and ethical standards underlined in the Code.

The Company's suppliers must ensure that their staff have working conditions based on respect for human rights, international conventions and applicable laws. Therefore, any form of exploitation of child and non-child labour is strictly prohibited. The Company's suppliers are also required to fully comply with legality and commercial fairness, with particular reference to the regulations on free competition and the market, the protection of intellectual property, the laws fighting money laundering and organized crime.

If Poliplast should become aware of the violation of the aforementioned standards, the Company will immediately intervene to interrupt any relationship between the aforementioned supplier and the Company itself.

In accordance with the principle of integrity, in relations with suppliers, it is forbidden to give or receive gifts/favours that may be interpreted as exceeding the ordinary practices of commercial courtesy or in any case implicitly aimed at unduly acquiring favourable treatment for oneself or for the Company.

Art. 8 – Relations with the Public Administration and Certifying Bodies

8.1 Public Administration

All relations with the Public Administration are inspired by the strictest compliance with the provisions of the law and company procedures, in compliance with the principles of fairness, loyalty and transparency.

The Company's relations with the subjects representing the Public Administration are managed by authorised persons, within the limits of their role and in accordance with the law.

In carrying out such relationships, the Recipients of this Code must absolutely avoid conduct that can be interpreted as collusive, or in any case able to undermine the principles listed above (by way of example, the offer – even indirect – of money or benefits of any kind).

8.2 Police and Judicial Authorities

The Company ensures and promotes correct, transparent and cooperative behaviour towards the security and judicial police bodies and with the Judicial Authorities.

In the event of control or inspection procedures, the personnel involved undertake to promptly implement the instructions given, respecting their respective roles. The Company prohibits any type of conduct that may affect the outcome of ongoing legal proceedings. It is forbidden any form of conditioning towards anyone (employee, collaborator or third party) who is called upon to make statements before the Judicial Authority.

8.3 Certifying bodies

Relations with the Certifying Bodies must be developed in accordance with the principles of transparency and loyal collaboration.

In the event of inspections, Poliplast's staff is required to cooperate, respecting each other's roles. Any conduct aimed, even indirectly, at influencing auditing and evaluation activities is prohibited.

Art. 9 – Centrality of human resources

9.1 Occupational safety and health

Poliplast, considering human resources as the most important asset of the company's assets, is committed to creating and maintaining safe working environments for every employee.

Specifically, the Company operates in strict compliance with current accident prevention regulations, adopting safety management systems focused on prevention, aiming to introduce - at every level of the company - a strong culture of safety at work. The Company provides its employees with adequate training and information to work in health and safety conditions and to disseminate the correct practice. Poliplast recognises, as a strategic corporate objective, the continuous improvement of operating procedures, environments and working conditions of its staff.

Each Recipient of the Code of Ethics is called upon to personally contribute to the protection of health and safety, both his own and that of other people present in the company, committing itself, with awareness and a sense of responsibility, to compliance with regulations and internal procedures adopted on the subject, first and foremost in implementation of Legislative Decree 81/2008.

9.2 Enhancement and protection of personnel

The Company offers staff opportunities for training and growth, enhancing and protecting individual human and professional characteristics, aware of the primary strategic importance of human resources, in order to improve the wealth of individual and corporate skills.

Poliplast promotes a comfortable, positive and rewarding working environment, based on the principles of respect and dialogue, mutual understanding and collaboration, condemning all forms of abuse.

At the same time, the Company is committed to creating a working environment that promotes diversity and protects the mental and physical well-being of employees. The Company promotes corporate policies that promote equal opportunities throughout the company's entire career resource, starting from the recruitment process and then continuing in the HR processes of Onboarding, Job Rotations, Training and Career Development.

In its evaluations – both in the recruitment and in the management of personnel – Poliplast uses exclusively objective and meritocratic criteria based on skills, experience and objective capabilities, trying to avoid prejudices, stereotypes or considerations based on gender. In this sense, Poliplast encourages an inclusive culture that values all the people present in the company in the same way. In compliance with articles 35 et seq. of the Constitution and in compliance with the basic standards provided for by art. 603-bis, paragraph 3 of the Criminal Code, the Company and all the Recipients recognize and protect the rights of workers, both in terms of assets, in the personal sphere and in relation to trade union activities. They also undertake not to use, even indirectly, forced and/or child labour, as well as to prevent any form of mobbing, abuse and exploitation of labour, both direct and indirect.

9.3 Personnel selection and management

In the recruiting process, the Company excludes any form of discrimination based on criteria different from the objective criteria of competence, professionalism and merit, operating first and foremost through the evaluation of the candidate's curriculum vitae.

All information and personal data acquired during the selection process is processed in accordance with the Data Processing Regulations.

All employees are hired regularly, in accordance with the types of contracts in force. The systems for assigning tasks and determining remuneration are calibrated to the skills, abilities and commitment of individuals, taking into account the company's interests and workers' growth prospects.

9.4 Prohibition of discriminatory conduct

The Company, in respect of diversity in the workplace, strictly prohibits any conduct that represents a form of discrimination based on age, ethnic origin, nationality, gender, sexual orientation, ethical, religious, political and/or trade union beliefs.

Art. 10 - Equal opportunities and gender equality

Poliplast ensures equal opportunities in professional development and promotions, basing its evaluations on the meritocratic criterion and on professional skills and levels, while ensuring equal pay between men and women.

The Company guarantees women full and effective participation in corporate life, including in positions of leadership and responsibility at all levels, compatibly with the company's activities and the employment demand that the company faces.

Also from this point of view, Poliplast is proud to present itself to its stakeholders as a virtuous reality

that is attentive to the needs of our planet, with a view to full compliance with the objectives of the UN 2030 Agenda and in general with the policies of inclusiveness conducted by our country and the European Union.

Art. 11 – Company assets

The Company provides its staff with various business tools necessary to do their jobs in a proper way. Those who use property owned or at the disposal of the Company must take the utmost care of it. Employees and Collaborators are required to use them responsibly and prudently, in an appropriate manner and relevant to the company's objectives, possibly inquiring with their manager about the methods/limits of use.

In any case, it is strictly forbidden to use the goods supplied in a manner and/or for illicit purposes or not in line with the values of the Code of Ethics.

Art. 12 – Know-how, intellectual property, including third-party

Poliplast is able to obtain high-level products thanks to the excellent know-how acquired over the course of its history, to which it combines the most cutting-edge technologies.

Over the years, the Company has adapted its plants several times to the new needs of manufacturing and moulding plastic components for the automotive industry.

R&D department is the *beating heart* of Poliplast, where the best projects are born and then processed in the modern presses of the molding department: **in this laboratory precision and power meet.**

In order to protect these assets, it is forbidden to disclose confidential information of the Company, without any written authorization from the Poliplast Administrative Body. The recipients of this document must operate in full compliance with the industrial and intellectual property rights legitimately belonging to third parties, as well as in compliance with the provisions contained in laws, regulations and conventions for the protection of such rights.

In particular, the Company and all Recipients undertake to:

- not to illicitly use software covered by the exclusive rights of third parties;
- not to illicitly disseminate copyrighted materials/products;
- not to use other people's trade secrets;
- not to imitate or tamper with trademarks, distinctive signs, patents owned by third parties;
- in general, not to engage in conduct that may constitute usurpation of industrial property rights, alteration or infringement of patents, nor to market products made by usurping the rights of third parties or characterized by false signs.

Art. 13 – Protection of competition and the market

The Company pursues its success by recognizing and protecting competition as a stimulus for growth and improvement of the market, as well as of its business.

Poliplast develops its business according to the criteria of transparent, fair and fair competition,

requiring all its employees to refrain from collusive conduct and to participate in transactions that may lead to violations of the rules protecting competition in the market.

Art. 14 – Separation of personal interests from corporate responsibilities

Poliplast recognises the right of staff and collaborators to participate in businesses outside the workplace, provided that these activities are permitted by law and, in any case, compatible with the contractual obligations assumed with the Company.

The Company's staff undertakes to avoid situations in which personal interests may, even potentially, conflict with Poliplast's interests (for example, providing assistance to a competing company). Everyone is required to report to their superior any situations in which they or, to the best of their knowledge, their relatives, have economic and financial interests in conflict with the interests of the Company.

Art. 15 – Confidentiality of personal data

Any resource of the Company, which, in the performance of its activity, acquires personal data is required to process the same in compliance with EU Reg. 679/2016 ("GDPR") and national legislation on privacy, as well as the related internal policies. In this perspective, it is permitted to acquire and process only personal data that are necessary and directly related to one's functions, ensuring the relevance of the processing with the declared and pursued purposes.

the Company's employees and collaborators must use the utmost caution and care in the use of information that is not in the public domain and derives from the performance of their duties.

Art. 16 – Environment and sustainability

The protection of the environment is an imperative of the Company that embraces an ecological perspective for the benefit of present and future generations; guarantees and promotes strict compliance with current environmental legislation.

Poliplast operates in compliance with all quality and environmental standards using the latest filtration and emission purification techniques.

The Company is dedicated to the correct management of waste, from the company's activities, which is disposed of, in different ways depending on whether or not it is waste assimilated to urban waste, also through the use of third-party companies, equipped with appropriate and documented qualifications and authorizations on the subject.

Poliplast is determined to be an active part in the processes for fair and sustainable development, creating - with its activities - value for all our stakeholders.

Final provisions

Supervision of the application of the Code of Ethics

Poliplast identifies the Supervisory Body, appointed by resolution of the Board of Directors and in

accordance with the provisions of Model 231, as the body responsible for verifying the concrete application of this Code of Ethics by all Recipients, within the scope of the provisions of art. 6 of Legislative Decree 231/2001.

It monitors the initiatives undertaken by the Company in order to disseminate knowledge and understanding of the Code; verifies the consistency between the actual conduct of individuals and the principles, norms and standards of conduct provided for in this document; suggests any changes, updates and additions; receives and analyses reports of violations of the Code; formulates proposals regarding the possible adoption of sanctioning measures in cases of ascertained violation of the Code of Ethics.

Reporting Tools

Employees, partners, collaborators, business partners and any other Recipient of the Supervisory Body who believe they are reporting violations of this Code and/or Model 231 adopted by the Company may contact their direct contacts sending an e-mail to odv@poliplastsrl.it

Whistleblowing

In order to ensure the effective application of the Code of Ethics and Model 231, the Company requires all those who become aware of any cases of non-compliance to also report it through the web platform at the following link <https://whistleblowing.noverim.it/poliplast>.

No measures are adopted against those who submit reports of violations of this Code of Ethics in good faith and which subsequently prove to be non-existent, in line with the decision to encourage, in any case, dialogue and communication as a tool for continuous improvement of the Code of Ethics.

Whistleblowers will be guaranteed against any form of retaliation, discrimination or penalization and in any case the confidentiality of the whistleblower's identity will be ensured, without prejudice to legal obligations and the protection of the right of defence of the Group or of the accused persons. On the contrary, the Company may take action against those who make reports with intent or gross negligence that prove to be unfounded.

For more information on the Whistleblowing channel, you can view the information at the following link https://www.poliplastsrl.it/pdf/privacy_whistleblowing.pdf or request a copy of the Whistleblowing Protocol adopted for this purpose by the Company by writing to contabilita@poliplastsrl.it.

Sanctioning system

Compliance with the Code of Ethics is an integral part of the contractual obligations of employees, collaborators and, more generally, of all the Recipients of the document.

Any violations render sanctions applicable by the Company, modulated in relation to the "Circumstances of the Fact", or

- (i) the gravity of the infringement;
- (ii) whether the infringement has been repeated;
- (iii) intentional or negligent performance

as specified in the Disciplinary System provided for by Model 231 of Poliplast S.r.l.

The type of sanction applicable will vary depending on the relationship between the Company and the person who committed the offence (in particular, whether an employee or a third party).

As far as employees are concerned, non-compliance will be prosecuted through specific disciplinary measures defined on the basis of the Fact, taking into account the regulations of the employment contract in place.

With reference to collaborators, customers and suppliers, corrective measures will be applied to the relationship, and, in the most serious cases, the termination of the contract.

The procedure for the application of the aforementioned sanctions is completely independent of the opening, as well as the outcome, of any criminal proceedings initiated by the judicial authority in relation to the facts that constitute the violation of the Code of Ethics.

Adoption and amendments to the Code of Ethics

This Code of Ethics has been adopted by the Company's Board of Directors.

In the event of regulatory changes or in the event of a change in the company organization, this document will be adapted as appropriate.

Conclusions

The Code of Ethics is published on the **www.poliplastsrl.it**; available at the Company's registered office and operational offices. It is disseminated through information and communication activities to all Recipients and stakeholders.

The Board of Directors will constantly update it.

Carate Brianza (MB), 10 May 2024