

CODE OF ETHICS

Introduction

Plastylenia is a well-established company in the flexible packaging sector for food and non-food products, specializing in flexographic and rotogravure printing. The company operates with creativity, efficiency, and quality, paying the utmost attention to human rights, working conditions, and environmental protection.

This Code of Ethics defines the principles and values that Plastylenia is inspired by in carrying out its activities, guaranteeing social responsibility, integrity and sustainability in all company processes.

Values and principles

The Code of Ethics is based on the following references:

- Universal Declaration of Human Rights of the United Nations
- Conventions and recommendations of the International Labour Organization (ILO)
- United Nations Guiding Principles on Business and Human Rights (UNGPR)
- OECD Guidelines for Multinational Enterprises
- Children's Rights and the United Nations Business Principles
- Gender dimensions of the United Nations Guiding Principles on Business and Human Rights
- OECD Sectoral Guidance Documents
- General principles for the processing of personal data according to EU GDPR 2016/679 and Swiss federal law LPD 2020

Worker involvement and protection

Plastylenia SpA, in the context of worker involvement and protection, is committed to:

- Promote responsible and gender-responsible management practices.
- Define long-term goals to protect workers and ensure their safety and well-being.
- Provide training and information on workers' rights and responsibilities, with particular attention to vulnerable subjects.
- Develop skills among managers and workers to integrate the Code of Ethics into the corporate culture.

No discrimination, violence or harassment

Plastylenia SpA is committed to:

- Treat all workers with respect and dignity.
- Ensure that workers are not subjected to any form of violence, harassment and inhuman or degrading treatment, nor threats of violence or ill-treatment, including corporal punishment, insults, physical, sexual, economic or psychological abuse, mental or physical coercion or other forms of harassment or intimidation.
- Understand the possible reasons for discrimination in their specific context and do not discriminate against them exclude people based on sex, gender identity, age, religion, race, caste, birth, social background, disability, ethnic and national origin, nationality, membership of trade unions or other legitimate organizations, political affiliation or opinions, sexual orientation, family responsibilities, marital status, pregnancy, illness or any other condition that may give rise to discrimination.
- Establish disciplinary procedures in writing and explain them verbally to workers using clear terms and language they understand. Disciplinary measures are consistent with national legislation.



- Provide fair and gender-neutral opportunities and treatment during recruitment and employment.
- Ensure that workers are not harassed, disciplined or subjected to retaliation for reporting problems based on one of the reasons listed above.

Fair pay

Plastylenia SpA is committed to:

- Comply, at a minimum, with the wages established by minimum wage legislation or, if higher, with industry standards approved through collective bargaining. • Pay wages regularly, punctually, and consistently, and in full in legal tender. Partial payments in the form of in-kind allowances are accepted only if they comply with ILO (International Labour Organization) specifications.
- Carefully assess the wage gap and progressively work towards ensuring that a minimum wage is paid that is sufficient to guarantee a decent standard of living for workers and their families.
- Reflect workers' skills, responsibility, seniority, and education in wages. • Ensure that workers of all genders and categories, such as migrant and local workers, receive equal remuneration for equal work and qualifications. • Apply deductions only under the conditions and to the extent permitted by law or established by contract.
- Provide workers with the social benefits provided by law, without negative repercussions on their wages, seniority, position, or promotion prospects.

Adequate number of working hours

Plastylenia SpA is committed to:

- Interpret national legislation, sectoral reference standards or existing collective agreements within the international framework defined by the ILO and promote working hours that allow a healthy work-life balance for workers.
- Use overtime as an exceptional and voluntary practice, paying it at a rate higher than the standard rate. Overtime work must not pose a significantly increased risk of occupational hazards and must under no circumstances exceed the limits established by national legislation. • Grant workers the right to rest breaks during each working day and the right to at least one day of rest every seven days, except as otherwise defined in collective agreements.

Health and safety in the workplace

Plastylenia SpA is committed to:

- Respect the rights of workers and local communities to healthy working and living conditions, subject to the specific expectations set out below. Vulnerable individuals, including but not limited to young workers, new mothers, pregnant women, and people with disabilities, should receive special protections. • Comply with national occupational health and safety legislation or international standards.
- Ensure that systems are in place to assess, identify, prevent and limit potential and actual threats to the health and safety of workers.
- Regularly train all departments and individual staff members in occupational health and safety and provide information on potential occupational health and safety risks to workers and the public, including affected communities. • Take effective measures to prevent workers from incurring accidents, injuries or occupational diseases.

- Keep records of all health and safety incidents in the workplace
- Inform workers of their right, and respect their right and responsibility, to leave the premises and/or cease working without having to ask for permission in situations of danger and risk uncontrolled.
- Provide adequate medical care at work with related facilities and ensure equal treatment for all workers accessibility to these services. Health services (including insurance) must serve to meet the specific needs and problems of people of all gender identities and ages.
- Provide free access to safe and clean drinking water and areas for eating and resting and, where applicable, provide access to areas for cooking and storing food.
- Provide an adequate number of safe and separate toilet facilities, with an adequate level of privacy for all gender identities, as well as paper towels and sinks with hand soap in all areas of Work.
- Provide all workers with effective and appropriately sized personal protective equipment (PPE) free of charge adequate, taking into account the needs of different categories of workers, such as pregnant and breastfeeding women.

Absence of child labor

Plastylenia SpA is committed to:

- Fully comply with national and international regulations on child labor. The company does not hire people under the minimum legal age for completing compulsory schooling. Furthermore, Plastylenia has chosen to hire only adults, ensuring that all employees are at least 18 years of age at the time of hiring. Any exceptions comply exclusively with provisions recognized by the International Labour Organization (ILO).
- Protect children from any form of exploitation.
- As part of the personnel selection process, establish effective mechanisms for determining of age that are not in any way disrespectful or degrading to the worker.

Special protection for younger workers

Plastylenia SpA is committed to:

- Ensure that young people are protected from working conditions that may harm their health, security, moral values and development.
- Remove young workers immediately from any dangerous work or source of danger and redefine their scope of work without resulting in any loss of income.
- Ensure that the type of work is not harmful to the health or development of young workers; that working hours allow them to attend school, participate in career guidance activities approved by the competent authorities or benefit from training or education programs.

Absence of precarious employment

Plastylenia SpA is committed to:

- Ensure that the personnel selection process and employment relationships do not cause insecurity and social or economic vulnerability for workers.
- Ensure that work is carried out on the basis of a recognised and documented employment relationship, established in accordance with relevant national legislation, customs or practices and international standards work, and in any case according to the criterion that provides greater protection.
- Before signing an employment contract, provide workers with understandable and in-depth information language and ensure that they are aware of their rights, responsibilities and conditions of employment, including working hours, remuneration and payment terms in their language.
- Aim to offer decent and, where necessary, flexible working conditions, which also support workers,



regardless of gender identity, parental or caregiver role, including migrant workers and seasonal workers whose children may have been left behind in their country of origin.

- Do not use employment contracts in a way that deliberately contravenes the actual intent of the law. This includes, but is not limited to: (a) apprenticeship or training programs where there is no intention to impart skills or provide regular employment; (b) seasonal or casual work where it is used to undermine worker protections; (c) labor-only contracts; and (d) contract substitution.

Prohibition of slavery, forced labor or human trafficking

Plastylenia SpA is committed to:

- Do not engage in, either directly or through business partners, and do not be complicit in any form of slavery, forced, compulsory, involuntary or trafficking-related labour, including labour forced imposed by the state.
- Adhere to international principles of responsible personnel selection, including the “Employer Pays Principle”, and require the same from its partners of personnel selection during the recruitment and selection of any worker, whether directly or indirectly, in particular members of vulnerable groups such as temporary and migrant workers

Environmental protection

Plastylenia SpA is committed to:

- Implement an environmental due diligence management system into your business practices based on processes and risks, adapting it to the company's business model. This can be also integrated into the general due diligence management system.
- Comply with national environmental legislation or international standards where applicable. national legislation is lacking or poorly implemented.
- Identify the environmental impacts of its activities and implement appropriate measures to prevent, limit and remedy negative impacts on surrounding communities, natural resources, and the climate and on the environment in general.
- Promote an internal analysis in order to reduce CO2 emissions in the production process.
- Ensure the correct handling, storage and disposal of hazardous waste and work to reduce the use of hazardous chemicals, seeking more sustainable alternative sources where possible.
- Efficiently use all fossil fuels and all materials derived from non-renewable resources Renewables. Explore the possibilities of using eco-friendly alternatives to foster circularity within your business, including but not limited to developing new products.
- Monitor the risks associated with water pollution in their production processes through “two diligence” and corrective actions. • Collaborate to eliminate deforestation, in all supply chains.

Business ethics

Plastylenia SpA is committed to:

- Not engage in any act of corruption, extortion or embezzlement, or any form of bribery, including, but not limited to, the promise, offer, giving or the acceptance of any monetary or other incentive.
- Develop and implement appropriate internal controls, programs or measures to prevent and detect cases of corruption, extortion, embezzlement or any form of bribery, developed on the basis of a specific risk assessment of the company.
- Maintain accurate information about your activities and performance, and disclose it accordingly current regulations and industry reference practices to improve the transparency of its activities.



- Not to falsify or participate in the falsification of information or any act of misrepresentation in supply chain.
- Inform workers about policies, controls, programs and measures to combat unethical behavior and promote compliance within the company through training and communication.
- Collect, use or otherwise process with reasonable care personal information, including of employees, business partners, customers, and consumers within their sphere of influence. The collection, use, and other processing of personal information must comply with the laws and regulatory obligations on privacy and information security.

At Plastylenia, integrity guides our every choice: we operate with responsibility, respect, and courage, because what we do today defines the world we will live in tomorrow.

Company Management

F. Stenta