

CODE OF ETHICS

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General provisions/Preamble

The Code of Ethics is the main tool that Plastod uses today to promote, disseminate and manage work and business ethics within the company and expresses the commitments and responsibilities assumed by the Directors, employees and collaborators of Plastod in the conduct of company activities. The definition of the code of ethics is based on a preliminary analysis of the founding values typical of a family business with a long history of dedication and passion for the product, today oriented towards sustainable growth with respect for people and all internal and external stakeholders.

This Code of Ethics represents a reference for all those who in various capacities work and collaborate with Plastod, contributing to effectively and significantly putting into action our objectives of reliability, efficiency and flexibility, quality, respect and innovation.

Introduction

Purpose of the Code of Ethics

This Code of Ethics is a fundamental guiding document that establishes the ethical objectives and purposes that guide the activities of people and the organization. The primary objective of this Code is to define a framework of values and behaviors based on integrity and responsibility, promoting a corporate culture based on solid ethical principles that constitute the foundation on which the behavior of each individual involved in corporate activities is based.

Recipients

This Code of Ethics is intended for all those who, in various roles, are involved in the activities and commercial relations of the organization. These recipients include:

Employees

Collaborators and Suppliers, that is, all those who have commercial relations with the company
Stakeholders and Interested Parties such as customers, investors, regulators and local communities.
Directors and Managers, who guide the organization in the practical implementation of this Code.
Every Individual Involved in business operations

Fundamental Principles

Honesty and transparency

Transparency and honesty are essential pillars, with Plastod Spa's commitment to communicate openly and honestly both internally and externally. In this context, honesty takes on the connotation of an inseparable guiding principle and constant commitment, outlining the ethical culture of the entire organization.

Responsibility

Accountability emphasizes each individual's commitment to colleagues and stakeholders. Fundamental to creating and maintaining relationships based on trust, accountability becomes the foundation on which lasting and profitable relationships are built.

Equity

The principle of equity is fundamental to our organization, and it translates into an unequivocal commitment against any form of discrimination. In accordance with this principle, discrimination of any kind is not tolerated. This commitment not only reflects our dedication to fostering an inclusive and diverse work environment, but is also a cornerstone in building a corporate culture of equity and respect.

Respect

Respect for people is a core value in our corporate philosophy. We are committed to promoting and maintaining a work environment where mutual respect is a priority. Consideration for diversity of thought, experience and background is central to this approach, helping to create an inclusive culture. This dedication to respect not only reflects our core ethical values, but consistently guides all of our interactions and decisions.

Adherence to the fundamental principles translates directly into the essential values of reliability, quality, innovation, respect, efficiency and flexibility that define the very essence of our company. Every decision and action we take, inspired by these principles, not only reflects our integrity as an organization, but also our constant

commitment to ensuring a service and a product that reflect the highest standards. Together, these principles and values are the driving force of Plastod Spa, guiding us towards a sustainable and successful future.

Professional Conduct

Governance

Directors make decisions that aim to create value for shareholders and all stakeholders in a medium-long term horizon. The Board of Directors is constantly committed to developing a systematic dialogue with shareholders, based on understanding and distinguishing mutual roles.

The Board of Directors and the Directors guarantee the protection of the company's assets, reliable and transparent information, effectiveness and efficiency in the conduct of company operations as well as compliance with the laws and regulations in force. Each employee works to ensure that management events are represented in the accounts in a correct, truthful and timely manner and that the documentation is always traceable and consultable. In the context of management, the directors and company representatives strictly observe the laws established to protect the integrity of the company's assets in order not to harm the guarantees of creditors and third parties in general, ensuring the necessary information in a complete and timely manner to the Board of Auditors and the shareholders.

Internal Relations

Respect, honesty and meritocracy

In the area of internal relations, the company establishes some guidelines aimed at promoting a work environment based on respect, honesty and meritocracy. These principles form the basis of interactions between colleagues, superiors and subordinates, outlining an ethical framework for constructive and harmonious collaboration.

Specifically, the following key points are identified:

- *Mutual Respect*
- *Open Communication*
- *Effective Collaboration*
- *Constructive Management of Differences*
- *Equity in Opportunity*
- *Constructive Feedback*

Furthermore, we believe that meritocracy is an essential pillar of our company. We value talent and hard work, promoting opportunities based on the merit and capabilities of each individual. We believe that rewarding merit fosters a dynamic and motivating work environment, where each person has the opportunity to grow and contribute to the success of the company.

Recruitment and Selection

The evaluation and selection of personnel are conducted with correctness and transparency, paying particular attention to respecting equal opportunities. The objective is to combine the needs of Plastod Spa with the professional profiles, ambitions and expectations of the candidates. Plastod Spa undertakes to adopt all necessary measures to prevent any form of favoritism during the personnel selection process, using objective and meritocratic criteria that safeguard the dignity of the candidates and promote company efficiency.

Training

Plastod Spa's commitment to training is a fundamental cornerstone for maintaining and continuously improving the skills of each employee. In line with the principle of equal opportunities, we aim to provide skills to all employees, ensuring an environment in which access to learning is fair and inclusive. The company aspires to be an example and an inspiration for external stakeholders, demonstrating a tangible commitment to professional and personal growth.

Health and safety

In compliance with the provisions of Legislative Decree 81/08 and subsequent additions, Plastod Spa adopts all technical and organizational measures to assess and reduce risks at work. Plastod Spa ensures full understanding of the principles of prevention and company procedures, providing the necessary tools to employees. Through the

adoption and compliance with the Company Management Manual for Quality, Plastod Spa guarantees a safe work environment for staff and the surrounding environment, promoting safe processes and products.

Harassment in the workplace

Plastod Spa considers any act or behavior that constitutes harassment or violence in the workplace to be unacceptable and undertakes to adopt appropriate measures against anyone who commits such acts.

In the company, everyone has the duty to collaborate in maintaining a work environment in which the dignity of each individual is respected and interpersonal relationships are encouraged, based on principles of equality and mutual fairness, also in implementation of the Framework Agreement on harassment and violence in the workplace signed between Confindustria and Cgil Cisl Uil on 25.1.2016.

Protection of intellectual and industrial property

Plastod Spa complies with current regulations on trademarks, patents and copyright, committing to protect and enhance its own and others' intellectual property rights. To this end, Plastod Spa undertakes not to manufacture, market or distribute products already patented by third parties without appropriate authorization, as well as products that present misleading signs regarding their origin or quality.

When using graphic materials (photographs, images, graphic or visual representations, diagrams, etc.) for communication and marketing purposes, Plastod Spa carries out the necessary preliminary checks in order to avoid any possible copyright infringement.

External Relations

Principles of conduct in relationships with suppliers, customers and consultants

In managing relationships with suppliers, customers and consultants, Plastod Spa follows principles of conduct that reflect a commitment to transparency, ethics and responsibility. Each transaction is characterized by clarity and fairness, with agreements that exclude any form of discrimination or ambiguity. We maintain strict compliance with laws and regulations, ensuring the protection of sensitive information and data of the subjects involved in our interactions. Employees, collaborators and all those who operate on behalf of the company must avoid accepting, offering or promising personal benefits, gifts, freebies or advantages of any kind that could, even potentially, compromise the impartiality and integrity of their professional decisions and actions. It is permitted to accept or offer gifts of modest value, within the limits of normal commercial or courtesy practices, as long as they do not compromise the independence and professional ethics of the person receiving or offering them.

Principles of conduct in relations with the Public Administration, Authorities and Institutions

In its relationship with the Public Administration, Plastod Spa follows principles that embody the values of integrity and responsibility, operating in compliance with laws and regulations and ensuring transparency and compliance with the rules.

We take a firm stand in the fight against corruption, taking preventive measures and promoting a corporate culture that discourages unlawful practices.

Use of Resources

Financial, Technological and Human Resources

In pursuing our goals, we responsibly manage financial, technological and human resources. We seek to create a positive and lasting impact, balancing the careful management of financial resources with the conscious choice of technologies to improve efficiency and reduce environmental impact. We value human resources, promoting an inclusive and stimulating environment that fosters professional growth and well-being. This approach embodies our commitment to responsible corporate leadership that is attentive to people, the environment and the community.

Environment and Sustainability

Plastod Spa is strongly committed to pursuing long-term sustainability goals, with the aim of generating a positive impact on people, society and the environment. We recognize sustainability as a global challenge and actively involve every stakeholder in the company to promote and support this shared goal.

This commitment is not only a response to current environmental challenges, but is an integral part of our vision for a better future. Through sustainable practices and initiatives, we seek to balance economic growth, social

well-being and environmental protection, transforming sustainability from a business practice to a corporate philosophy.

We promote transparency in communicating our progress towards sustainability goals, fostering a culture of shared responsibility. Through this tangible commitment to sustainability, we aim to create a long-term positive impact, demonstrating that quality and reliability can coexist with social and environmental responsibility.

Conflict of Interest

In our commitment to transparency and integrity, we recognize the importance of openly addressing potential conflicts of interest. A conflict of interest exists when personal interests or individual activities may affect the ability to act in the overall interest of the Company.

All Plastod Spa staff and collaborators are required to refrain from participating in any activity that may generate a conflict of interest, thus ensuring neutral and impartial decisions in the exclusive interest of the Company. It is essential that employees and collaborators disclose all potential conflicts of interest and discuss them with their function.

Transparency and Communication

Internal communication

Internal communication in Plastod Spa is characterized by a transparency-oriented approach. Internal press releases are regularly issued to inform employees about important company developments, new initiatives or significant events. Furthermore, to ensure effective communication in the various professional areas, the adoption of targeted and participatory approaches is promoted, also through periodic meetings with managers, middle managers, all staff and line personnel. This internal communication process aims to consolidate an informed, engaging and collaborative work environment, where each member of the organization feels an integral part of it and adequately informed about key company developments.

External communication and social media

Behaviors that do not respect the ethical values of this Code, even by individuals, can damage the image and reputation that Plastod Spa has built over the years. It is therefore essential that all recipients act appropriately to protect the integrity and reputation of the company, especially when it comes to external interactions and the use of social networks. This involves a responsible use of social media, adopting appropriate language when using a profile associated with the company name. External communication must reflect the company values of transparency, respect and professionalism, thus helping to preserve and strengthen the reputation of Plastod Spa.

Privacy Policy

Plastod Spa places the utmost importance on the protection of privacy and undertakes to ensure that the information and data acquired and managed by staff and collaborators, during the performance of their work activities and within specific databases, are used in accordance with established company procedures and in full compliance with current regulations.

Anyone working in the company context is required to personally commit not to reveal any personal data to which they have access during the performance of their duties. This individual commitment helps to create a work environment that respects the privacy of each member of the organization, avoiding any improper use of sensitive information relating to employees, collaborators and anyone who comes into contact with the company.

Whistleblowing

Plastod Spa has implemented a whistleblowing system in compliance with the provisions of Legislative Decree 10 March 2023, no. 24 which implemented EU Directive 2019/1937 regarding "the protection of persons reporting violations of Union law". This System is intended for all directors, shareholders, attorneys and employees of Plastod Spa and all its collaborators (temporary workers, interns, trainees, service providers, agents and consultants who collaborate with the company).

Code Violations and Disciplinary Procedures

Compliance with the provisions of this Code of Ethics and any applicable company regulations is considered an integral part of the contractual obligations entered into by employees. Any violation of the principles and contents of the Code of Ethics will be considered a breach of contract or a violation from a disciplinary point of view, with all the related legal consequences. Such violations could also lead to civil liability for damages for the person who committed the violation.

For all other subjects to whom this Code of Ethics applies, in the event of violation of the principles and contents of the Code, the contractual remedies provided by the applicable law will be adopted, in accordance with the terms and provisions contained therein.

Adoption and updates and/or modifications of the Code of Ethics

This Code of Ethics is adopted by resolution of the Board of Directors (BOD), confirming the company's commitment to ethical principles and corporate responsibility practices. Updates necessary to keep the Code compliant with evolving regulations and requirements will be subject to approval by the Board of Directors.

Furthermore, to ensure its continued relevance and timeliness, the Code of Ethics will be reviewed and updated regularly every five years, reflecting the evolution of the business context and the needs of society.

Calderara di Reno, 30th October 2024

Approved by the Board of Directors