



CODE OF ETHICS

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1. PREMISE

ALUBERG S.p.A. (hereinafter also the "**Company**"), is a company specialising in the production and marketing, both in Italy and abroad, of articles intended for packaging with particular reference to primary pharmaceutical and food packaging.

The Company has deemed it appropriate and necessary to adopt and issue a Code of Ethics (hereinafter also the "**Code**") that specifies the values to which the conduct of all those who, at the various levels of responsibility, contribute with their own acts to the performance of their duties, including consultants and/or suppliers and external collaborators however named.

2. PURPOSE AND FIELD OF APPLICATION

The following functions are assigned to the Code:

- **preventive:** the encoding of the ethical principles of reference and the basic rules of conduct to which all stakeholders must conform, constitutes the express declaration of the serious and effective commitment of the Company to be a guarantor of the legality of its activity, with particular reference to the prevention of offences;
- **cognitive:** the Code, through the enunciation of abstract and general principles and rules of conduct, makes it possible to recognise unethical behaviours and to indicate the correct methods of exercising the duties and powers attributed to each;
- **legitimacy:** the Code specifies the duties and responsibilities of the Company towards stakeholders so that it meets their expectations;
- **incentive:** the Code, by imposing compliance with the principles and rules contained therein, contributes to the development of an ethical awareness, strengthens the reputation of the Company and the relationship of trust with stakeholders.

The set of ethical principles and values expressed in the Code must inspire the activity of all those who operate within the Company, taking into account the importance of the roles, the complexity of the duties and responsibilities entrusted to them for the pursuit of the Company's mission.

The Code is addressed to all; in particular, by way of example but not limited to:

- the members of the Board of Directors of the Company, who are inspired by the principles of the Code in setting their objectives;
- the Chairman, who complies with the Code in representing the Company, in the task of supervising its operation and implementing Board resolutions;
- top management who:
 - assume loyal and transparent attitudes and adopt exemplary and impartial conduct in their relations with all employees and collaborators of the Company, as well as with third parties who have relations with the latter;
 - take care of the organisational well-being of their departments, fostering the establishment of cordial and respectful relationships among employees;

undertake initiatives aimed at the constant sharing of information, the training and updating of staff, the inclusion and respect for differences in gender, age and personal conditions. Top management shall also, within the limits of its possibilities, handle news concerning the Company's organisation, activities and employees in a transparent manner and promote the dissemination of knowledge of good practices and good examples in order to strengthen the sense of trust in the Company;

- to Company employees and collaborators as well as to third parties who have relationships with the latter which, with due respect to law and current regulations, adapt their actions and conduct to the principles, objectives and commitments provided for by the Code of Ethics;
- to suppliers, consultants and, in general, third party companies with which the Company has relations.

All the parties listed above and all those who work to achieve the purpose and objectives of the Company are, therefore, considered Recipients of the Code.

The Recipients undertake to pursue their objectives with loyalty, seriousness, honesty, competence and transparency, in full compliance with the laws and regulations in force.

In this context, the Company undertakes to:

- promote the maximum dissemination of the Code of Ethics, providing for its in-depth analysis and updating;
- ensure and promote strict compliance with the laws and the Code of Ethics;
- ensure and promote a differentiated training and awareness programme on issues related to the Code of Ethics;
- carry out all the necessary checks in relation to any news concerning possible violations, applying, in case of ascertainment of the same, adequate sanctions.

3. BASIC VALUES

All Recipients must comply with the following values:

- **Impartiality:** in carrying out their work, the directors, employees, collaborators and all those who in any capacity work on behalf of the Company must be impartial. The Company refutes and rejects any discriminatory behaviour based on gender, nationality, religion, personal and political opinions, age, health and economic conditions of its interlocutors, including its suppliers.
- **Legality:** all activities must be carried out in awareness of the applicable primary and secondary legislation and in compliance, both formal and substantive, with it.
- **Integrity:** the Company's objectives must be pursued with honesty, fairness and responsibility, in compliance with the rules of professional ethics, without pursuing personal or corporate profit in violation of the laws in force and the rules of this Code.
- **Respect for the rules, ethics and morals:** directors, employees, collaborators and all those who in any way act on behalf of Aluberg are called to understand and respect the ethical values, moral practices, laws and regulations of the country in which they live and work. Under no circumstances may the pursuit of the Company's interest be in breach of the law.

- **Transparency:** reporting in a clear, comprehensive and diligent manner in order to enable all stakeholders to make their own informed and autonomous decisions.
- **Confidentiality:** protect the confidentiality of information and data of which you should become aware; do not use them, without prejudice to the obligations provided for by law, for purposes unrelated to the performance of your task; take care to comply with all the requirements of the law on privacy, in order to ensure security in information processing through the use of reliable systems and technologies.
- **Enhancement of human resources:** human resources are recognised by the Company as a fundamental and indispensable factor for business development. Consequently, Aluberg protects the growth and professional development of staff in order to increase the wealth of skills possessed, guarantees respect for individual dignity and differences in gender, age, ethnicity, religion and political and trade union membership, etc.; respect for personal psycho-physical, moral and cultural integrity through a safe working environment in which relations between colleagues are based on loyalty, fairness, collaboration, mutual respect and trust.
- **Fairness:** follow a behaviour inspired by respect for rights, including from the point of view of privacy and opportunities, as well as existing laws aimed at protecting the individual responsibility of all parties involved at a professional level. Respect the good rules of morality and ethics, ensuring appropriate checks for the proper performance of the Company's activities.
- **Efficiency:** in every work activity, the cost-effectiveness of the management and use of company resources must be pursued together with the reduction of waste and non-value-added activities. In each task, each employee is called upon to use the resources available to the extent that they are necessary for the completion of the task and tend to eliminate rework by preventing errors.
- **Fair competition:** the Company recognises the value of competition when inspired by the principles of fairness, fair competition and transparency towards operators on the market, undertaking to respect these principles without damaging the image of competitors and their products.
- **Protection of the environment:** Aluberg recognises the protection of the environment as a principle of fundamental importance, ensuring a coherent, balanced and sustainable growth path. Consequently, the Company is committed to safeguarding the environment and contributing to the sustainable development of the territory also through the use of the best available technologies, the constant monitoring of company processes and the identification of industrial solutions with a lower environmental impact.

4. EMPLOYMENT RELATIONSHIP

The Company acknowledges that its employees are an indispensable element for its existence and development; it recognises their centrality, in the conviction that the most important factor for the success of its business is the professional contribution of each individual, in a context of loyalty and mutual trust.

In this respect, Aluberg offers all its employees equal employment opportunities, according to their professional

characteristics, skills and knowledge, as well as their ability to perform, without any discrimination.

The Company, therefore, pays particular attention to the enhancement, protection and development of the skills and know-how of all its employees, so that they can express their potential and professionalism at the highest level, within their assigned tasks.

The Company undertakes to adopt criteria of impartiality, merit, competence and professionalism for any decision concerning relations with the personnel it uses and with collaborators in general. No discriminatory practices are permitted in the selection, recruitment, training, management, development and remuneration of personnel.

Aluberg, among its main objectives, aims to create a work environment free of harassment. Specifically, harassment is identified in offensive behaviours that aim to create a threatening, hostile, and offensive environment. Behaviour is defined as harassing, regardless of whether it is physical or verbal or whether it is carried out in person or by other means (letters or e-mail).

To this end, the Chief Executive Officer and top management, in compliance with all laws, regulations and policies in force, undertake to:

- select, hire, remunerate, train and evaluate employees based on criteria of merit, competence and professionalism, without any political, trade union, religious, racial, language and gender discrimination;
- do not hire workers from foreign countries with invalid residence permits and avoid their use even by their suppliers/consultants;
- ensure a working environment in which relations between colleagues are based on loyalty, fairness, collaboration, mutual respect and trust;
- offer working conditions that are adequate from the safety and health standpoint, as well as respectful of morality of all, in such a way as to foster interpersonal relationships free from prejudice;
- intervene in the event of attitudes that do not comply with the principles set out above;
- specifically combat any form of intimidation, hostility, isolation, undue interference or conditioning, sexual harassment.

In the evolution of the employment relationship, Aluberg promotes the development of the potential and professional growth of each resource by providing training and refresher programs in relation to the professional profiles and potential of each.

Staff are required to request the acquisition of new skills and knowledge, work methods, facilitate the exchange of professional knowledge between colleagues and with their superiors or top managers, while the latter are required to pay the utmost attention to the enhancement of the potential of the people they manage, requesting services consistent with their assigned tasks.

Asking subordinates for personal favours or any behaviour which constitutes a violation of this Code of Ethics or of the applicable legislation is an abuse of authority.

5. RELATIONS WITH PUBLIC INSTITUTIONS

5.1 Code of Conduct in Relations with Institutions

With reference to the relationships that are established with national or international institutions, Aluberg undertakes to avoid any type of discrimination and to communicate with all institutional partners at national and territorial level.

Only those who have received an explicit appointment from the Managing Director may maintain contact with institutional interlocutors, in order to ensure maximum clarity in the relationships.

Similarly, relations with public institutions aimed at safeguarding the overall interests of the Company and related to the implementation of its programmes that involve commitments towards them, are reserved exclusively those invested with specific powers.

By virtue of these principles, all Recipients must pursue the legitimate objectives of the Company and reject any unlawful agreement with representatives of the Public Administration and/or other associations/companies.

5.2 Relations with the Public Administration

In carrying out corporate business, the Company comes into contact with the Public Administration (by way of example only: ASL, ARPA, INPS, INAIL, Revenue Agency, Customs Agency, etc.).

In the context of these relationships, it is necessary to be inspired by the strictest compliance with applicable legal provisions, paying particular attention not to be involved in affairs in violation of legal provisions and this Code of Ethics. In particular, it is expressly forbidden to:

- offer, also through a third party, money or other benefits that may also consist of employment or commercial opportunities to involved public officials, to their family members or parties in any way connected to the same;
- unlawfully seek or establish personal relationships of favour, influence, interference suitable to influence, directly or indirectly, the outcome of the relationship;
- mislead, by artifice or deception, the public official in order to obtain an advantage for the Company;
- support the persuasive conduct of a public official or a public service official who, by abusing his title or powers, induces someone to give or unduly promise, to him or a third party, money or other benefits (e.g. employment or commercial opportunities to involved public officials, to their family members or parties in any way connected to the same).

Acts of generosity (such as, by way of example, gifts or forms of hospitality) are permitted solely if they do not exceed normal courtesy practices and if, in any case, they are such as not to compromise the impartiality and independence of judgement of the Public Administration Representative.

5.3 Judicial authorities and Supervisory authorities

Aluberg operates in compliance with the regulations in force; to this end, the Company carries out its activities in a lawful and correct manner.

In relations with the Judicial Authorities, it is expressly forbidden to engage in corrupt practices of any kind; in the event that the Company is involved in or out of court proceedings in civil, criminal, administrative and tax

matters, the staff, or anyone acting in the name and/or on behalf of the Company (e.g. external legal firms appointed for this purpose), must not in any way adopt behaviours towards the judicial authorities to induce such parties to adopt measures that have an unfair advantage for the Company.

The Company cooperates with any public official who has inspection powers and carries out investigations.

In the course of legal proceedings and/or an investigation/inspection by public authorities, no one shall:

- destroy/alter records, minutes, accounting records and any other type of document,
- lie or make/order to make false statements to the pertinent authorities.

Any attempt at extortion or corruption by a public official must be reported to one's superior.

In the context of relations with Supervisory Authorities and other Independent Administrative Authorities (e.g. the Data Protection Officer), the Company provides maximum collaboration so as not to hinder the authority's operations in any way, inspired by the principles of transparency, professionalism and full collaboration.

Communications and reports, including periodic ones, are provided in a complete and timely manner, in full compliance with the regulations in force as applicable and the internal procedures adopted by the Company.

5.4 Management of international relations

The Company undertakes to ensure that all relationships conducted by it, including those of a commercial nature, with parties operating internationally, take place in full compliance with laws and regulations in force with the aim of avoiding the danger of committing transnational crimes.

5.5 Corruption

No form of bribery is permitted, including the offering or acceptance of valuables or employment or commercial opportunities, in order to obtain or retain any kind of advantage for the Company.

Finally, it is forbidden to pay bribes to any person including civil servants or government employees, regardless of where they work.

6. CORPORATE ASSET USE

All employees and collaborators must bear in mind that the tangible and intangible assets placed at their disposal by the Company are to be used:

- with the utmost care and in their own way, also in order to avoid damage to property or persons;
- avoiding, as far as possible, waste, tampering or use that could compromise their efficiency or accelerate their deterioration;
- exclusively for purposes related and instrumental to the work activity, or in any case in accordance with the provisions of the agreements with the employee;
- absolutely avoiding - except as provided for by specific regulations - the use by third parties or the transfer of the same assets to third parties, even temporarily.
- Computer equipment and applications must also be used in accordance with the above, and in particular:

carefully following the security and confidentiality policies;

strictly avoiding the acquisition, use or transmission, especially if massive, of information and content not related to work;

not altering the hardware and software configurations provided by the Company.

All employees must also operate in order to reduce the risk of theft, damage, intrusion or other threats external to the resources assigned or present in the Company, promptly informing the managers in charge in case of abnormal situations.

7. CONFLICT OF INTEREST

All recipients and in particular the directors, employees, collaborators and those who in various capacities operates on behalf of the Company must avoid any situation and refrain from any activity that may oppose a personal interest - direct or indirect - to those of the Company or that may interfere and hinder the ability to take decisions, in an impartial and objective manner, in the interest of the Company itself.

The occurrence of situations of conflict of interest, in addition to being in conflict with the law and with the principles set out in the Code of Ethics, is detrimental to the image and integrity of the Company.

The Recipients must, therefore, exclude any possibility of overlapping or in any case crossing, exploiting their functional position, the economic activities corresponding to a logic of personal and/or family interest and the tasks they perform or hold within the Company.

In the event of any situation of conflict, even if potential, employees must immediately and thoroughly communicate them to their hierarchical superior or the control body in charge.

7.1 External positions

Employees must not carry out external activities that interfere with the ability to carry out their work at the Company. In particular, it is forbidden to accept work from external companies acting as suppliers, business partners or competitors of the Company, without the prior approval of the pertinent departments. Similarly, a conflict of interest could arise if a relative or family member of an employee works for a competitor or business partner of the Company.

7.2 Business opportunities

It is not permitted to accept business opportunities, payments, commissions or advantageous financial arrangements from a partner, customer, supplier, competitor of the Company.

Furthermore, it is not permitted to purchase for personal use goods or services from the Company's suppliers on terms other than those normally offered to the public or set out in Company policy.

8. INFORMATION USE AND DISSEMINATION

The Company considers the dissemination of correct, complete and truthful information on all facts - and the maintenance of due confidentiality on them, when necessary - as a prerequisite to create and maintain a relationship of transparency and trust with all its interlocutors.

Consequently, in managing information, employees must:

- keep all information of any kind concerning the Company of which they become aware in the performance of their duties scrupulously and with the utmost confidentiality;
- request consent to the processing of personal data, where required, for the purposes communicated.

In relation to information in general, employees must:

- avoid improper or instrumental use of the confidential ones in their possession, nor use them for their own benefit and/or that of family members, acquaintances and third parties in general;
- protect them from access by unauthorised third parties, prevent their dissemination unless specifically authorised by the Data Controller;
- not seek, or seek to obtain from others, those not relevant to their sphere of remit or duties;
- classify them and organise them in such a way that it is possible, for authorised persons, to access them easily and drawing a complete picture of them.

9. FINANCIAL STATEMENTS AND ACCOUNTING

9.1 Accuracy and transparency of official documentation

All official documents aimed at illustrating the Company's equity situation must be drawn up with the utmost care in order to guarantee their accuracy and truthfulness. They must also be drawn up in accordance with the laws and regulations in force.

When drafting the aforementioned documents, Aluberg staff must pay due attention and maintain those behaviours based on principles of correctness, honesty and integrity that must standardise the performance of the professional activities under their responsibility.

In any case, keeping/issuing documents that are deliberately false or falsified in such a way as to significantly alter the true representation of the Company's situation shall not be justified or justifiable.

9.2 Recording and documenting transactions

The operating events are recorded as quickly as possible in Aluberg's accounting system, based on the type of transactions to which they relate, while, on a daily basis, the personnel in charge record all bank and cash movements (income/expenses) referring to the previous day. Aluberg 's accounting system records transactions relating to the management of the Company, through; accounting records automatically recorded and accounted for through the computerised systems of the affiliated companies; accounting records manually recorded and accounted for, generated by direct entry by the personnel in charge.

Every Company operation, action and transaction shall be adequately recorded and documented so as to allow verification of the decision, authorisation and performance processes.

It is necessary to ensure that the data to be provided for the preparation of financial statements comply with all applicable accounting principles and the Company's internal auditing procedures.

Every act or operation carried out by the staff must be supported by adequate, clear and complete

documentation to be kept in the records, in order to allow the control of the reasons, the characteristics of the operation and the identification of the party who carried out the operation, who granted the authorisations and who carried out the checks at all times.

It should also be noted that it will not be possible to destroy, conceal or modify documents or records that hinder investigations, legal actions, verifications or inspections.

9.3 Accounting Transparency

All Aluberg departments are required to provide maximum collaboration in order to ensure correct and timely accounting records. Accounting records based on economic and equity evaluations must comply with the criteria of reasonableness and prudence.

Appropriate records must be kept for each accounting record. This documentation must make it possible to identify the reason for the operation that generated the entry and the relative authorisation. Supporting documentation must be archived and easily accessible.

Anyone who becomes aware of possible omissions, falsifications or irregularities in the keeping of accounts must immediately notify their superior.

Furthermore, in carrying out the audit and control activities by the auditing firm and the Board of Statutory Auditors, it is necessary to act with transparency and provide the utmost collaboration.

9.4 Internal controls

Aluberg spreads a culture based on the empowerment of people and control activities at all levels, in view of the positive contribution that they can make in terms of efficiency.

The Company, therefore, provides every collaboration, basing its conduct on the utmost correctness and transparency and transmitting the information and data suitable to allow for correct auditing in a timely manner.

All Company stakeholders (from top management to collaborators) are therefore responsible, within the framework of their own activities, for the definition and proper functioning of the internal control system.

9.5 Relations with auditors and public officials or supervisory authorities

Employees must cooperate with external and internal auditors, public officials or the Supervisory Authority in connection with any audit of the Company. Furthermore, it is not permitted to unlawfully influence an auditor or a member of the Authority during an audit of financial statements. Therefore, it is not permitted to provide misleading information, or to offer money or valuables for the successful completion of the audit.

10. HEALTH AND SAFETY AT WORK AND THE ENVIRONMENT

Aluberg attaches great importance to the physical and moral integrity of its resources, to working conditions that respect individual dignity and to safe and healthy working environments; the Company therefore takes care of the dissemination and consolidation of a culture of safety and health of workers in the workplace, developing risk awareness and promoting responsible behaviour by all personnel. Aluberg pays particular attention to environmental issues, making no compromises in the field of health and safety at work and promoting waste management policies that balance the Company's development needs with the need to

respect and protect the environment.

To this end, the Company undertakes to consider, in the context of operational management and the initiatives undertaken, the essential environmental needs and to minimise the negative impact that its activities have on the environment.

In particular, the principles affecting health and safety at work and environmental protection are as follows:

- a) eliminate risks and minimise them in relation to the knowledge acquired based on technological progress;
- b) assess the risks that cannot be avoided;
- c) communicate and disseminate information regarding the protection of workers' health, occupational safety and environmental protection to internal and external stakeholders;
- d) respect the principles of health in the workplace in the organisation of the same and in the choice of tools and working methods used;
- e) take all necessary actions aimed at ensuring compliance with current regulations;
- f) take into account the degree of evolution of technology in order to achieve excellence in the protection of health and safety at work and in the protection of the environment;
- g) replace what is dangerous with what is not or is safer;
- h) plan the appropriate measures to ensure improvement of safety levels;
- i) plan prevention, aiming at integrating technique, organisation, working conditions;
- j) give priority to collective protection measures over individual protection measures;
- k) give appropriate instructions to workers so as to involve all levels of the organisation and all employees, ensuring that responsibilities and procedures are precisely defined and clearly understood by all Aluberg staff;
- l) comply with the laws on working time.

The Employer and its delegates, as well as other figures with hierarchical and functional powers must take care, or ensure that third parties acting on behalf of the Company take care of compliance with the provisions in force and in general the provisions contained in Legislative Decree no. 81/2008.

The statutory bodies and the Employer must ensure that the Company has an organisational structure such as to ensure a clear division of tasks and obligations in the field of health and safety at work, formally defined as inconsistent with the organisational and functional scheme of the Company and with the regulatory and legal requirements, starting from the Employer and from the top management up to the individual worker.

All persons subject to occupational health and safety obligations must comply with the procedures and general protection measures laid down by the Company.

11. BUSINESS MANAGEMENT

Directors, employees, collaborators and those who in any way operate on behalf of the Company are required to comply with the laws and regulations in force in Italy and those of the country where they are to carry out their activity on behalf of the company. The following are the behaviours that the directors, employees,

collaborators and those who in any way act on behalf of Aluberg are required to observe.

11.1 Intellectual property rights and information protection

The Company, pursuant to this Code, claims the protection of Intellectual Property, including any creation of human intellectual property such as copyrights, patents, trademarks, trade secrets, design rights, logos, know-how and other types of industrial or commercial property.

With reference to the Company's confidential information, such as trade secrets, in respect of which all Aluberg employees are required to comply with the relevant laws on the abuse of confidential information, the Company prohibits their disclosure except for business purposes. In the event that there is a need dictated by the business, it is possible to disclose such information to third parties only after the preparation of a confidentiality agreement. The knowledge and technical skills developed by the Company constitute an important resource that everyone is called upon to protect and not to disclose.

The aforementioned confidentiality obligations of this Code apply during the employment period and even after the termination of the employment or collaboration contract with the company. When an employee leaves the Company, they must return all material containing confidential information or trade secrets in their possession.

11.2 Privacy

Aluberg guarantees a high level of security in the selection and use of its information systems intended for the processing of personal data and confidential information. Therefore, the Company prohibits the use or sharing of personally identifiable information of customers or employees with third parties, without first verifying that the recipient has been authorised to receive this information for a legitimate business reason, as well as without first ensuring that the person is bound by specific confidentiality agreements and contracts.

11.3 Money laundering protection

The Company requires maximum transparency in commercial operations and relations with third parties, in full compliance with national and international regulations, in terms of combating the phenomena of money laundering.

Accordingly, the Recipients may not enter into business relations on behalf of the Company with partners or suppliers or third parties who do not provide adequate guarantees of honourableness and good reputation, or whose name is associated with matters connected with money laundering.

All financial transactions, including contributions by shareholders, must be adequately justified and must be carried out by means of payment/conferral that guarantee traceability and lawful origin.

In addition, the Company shall only do business with reputable customers and suppliers who are engaged in legitimate business activities and whose revenues are derived from legitimate sources. Each business area shall have appropriate measures in place to ensure that forms of payment identified as a means of money laundering are not accepted.

The Company is committed to full compliance with all applicable international anti-money laundering laws, including those requiring the reporting of suspicious cash or other transactions. In particular, as a company established under Italian law, it is subject, among other laws and regulations, to the provisions of Law 197/1991

and Legislative Decree 231/2007, as subsequently amended and supplemented, which transpose the principles contained in the European Union reference directives on anti-money laundering and safeguarding the integrity of the financial system, as well as the provisions on self-laundering (Law no.186 of 15 December 2014 - OJ no. 292 of 17 December 2014).

11.4 Relations with suppliers/consultants

The Company recognises the value of the role of the supplier in the context of the services provided and for this reason considers it necessary to establish relationships of mutual trust, defining contracts that can reconcile the interest of the Company to an efficient and economic service with the right remuneration of the service itself.

The choice of suppliers and the determination of the conditions for the purchase of goods and services is carried out on the basis of objective and impartial criteria, mainly based on the assessment of seriousness, reliability, quality, efficiency and cost-effectiveness.

In purchasing procedures, the Company:

- ensures adequate competition;
- provides comprehensive and comprehensible information enabling all competitors to submit a suitable bid;
- adopts objective and documented criteria in the choice of suppliers;
- selects suppliers based on the evaluation of the quality and cost-effectiveness of the services, technical and professional suitability, and respect for the environment;
- verifies compliance with labour and occupational health and safety legislation.

Favouritism, collusive behaviour, payment of benefits, material and immaterial, or other advantages aimed at influencing or compensating representatives of institutions or employees or members of the Bodies of the supplier/consultant company are strictly prohibited.

Aluberg brings the content of this Code to the attention of suppliers and consultants by publishing it on its website.

11.5 Gifts and donations

General criteria of fairness, transparency and integrity must be applied in the course of the Company's activities. In particular, Recipients shall not:

- examine, propose or promise employment and/or business opportunities that may benefit employees of customers or suppliers in a personal capacity;
- offered in any way donations, gifts, benefits, including indirect ones, goods, labour and services not due, favours that go beyond ordinary courtesy relationships;
- undertake actions aimed at improperly influencing the decisions of the counterpart.

In addition, care must be taken in offering or accepting gifts or other forms of entertainment with anyone who has business relationships with the Company, as well as with current or potential customers or other business partners. In particular, they are not permitted to accept or offer gifts or other benefits in the following forms:

items that have significant value; favourable treatment.

In addition, they are not permitted to accept or offer entertainment as a gift that has:

excessive value;
no relation to the work performed;
an inappropriate form.

11.6 Corruption

No form of corruption is permitted, including the offering or acceptance of valuables or employment or commercial opportunities, in order to obtain or retain business relationships or services.

Finally, it is forbidden to pay bribes to any person, regardless of where they do their work.

12. DISCIPLINARY PROCEDURES

12.1. Dissemination and effectiveness

The Code of Ethics is one of the fundamental elements of the preventive system

The internal control system, oriented to the adoption of monitoring tools and methods, is aimed at countering potential risks in order to determine a reasonable guarantee on compliance with the laws and all the internal company provisions and procedures.

The Company undertakes to ensure:

- maximum dissemination of this Code of Ethics, through publication on the Company's website, delivery to employees and posting on company notice boards;
- the provision of cognitive, explanatory, information and awareness-raising tools with reference to the contents of the Code of Ethics;
- the performance of periodic checks in order to monitor the degree of compliance with the provisions contained in the Code of Ethics;
- the constant updating of the Code of Ethics, in relation to the evolution of the Company's activities, to any changes in its organisational or management structure, as well as in relation to the types of violations found in the context of supervisory activities;
- the provision of adequate prevention tools, the implementation of appropriate sanctioning measures, as well as the timely application of the same in case of ascertained violation of the provisions of the Code of Ethics.
- Where requested, a copy of the Code of Ethics shall be given to all persons having relations with the

Company. It is initially sent to employees by specific email or delivered at the time of hiring.

12.2 infringements

Everyone who comes into contact with the Company is obliged to observe and ensure observance of this Code.

Compliance with the rules contained in this Code must be considered an essential part of the contractual obligations provided for Company's employees, pursuant to Article 2104 of the Civil Code, as well as for its collaborators.

The violation of the aforementioned rules will constitute breach of the obligations deriving from the employment relationship and/or disciplinary offence, with every legal consequence, also with regard to the preservation of the employment relationship, being able to determine, in cases of serious violation, also the termination for just cause and with immediate effect of the relationship.

The Company undertakes to provide for and impose, with consistency, impartiality and uniformity, sanctions proportionate to the respective violations of the Code and in compliance with the current provisions on the regulation of employment relationships.

Aluberg encourages the Recipients to promptly report unlawful conduct or, in any case, contrary to the Code, of which they become aware due to their relations with the Company to the Supervisory Body. To this end, Aluberg has set up an internal infringement reporting system aimed at strengthening the safeguards of legality and transparency.

In this regard, anyone who commits retaliatory action against a person who makes a report in good faith or cooperates in an investigation, will be subject to disciplinary action which may also include dismissal.

Outside the cases of liability for defamation, or for the same reason pursuant to art. 2043 of the Civil Code, no Recipient who communicates a suspicion in good faith may be exposed to retaliation on the basis of the communication made, even if the suspicion proves to be unfounded.

Reports should be sent using the following e-mail address: amministrazione@cert.aluberg.it or through the box provided for this purpose.


Reports can also be made anonymously. The Supervisory Body acts in such a way as to guarantee whistleblowers against any form of retaliation, discrimination or penalty, also ensuring the confidentiality of the identity of the whistleblower, without prejudice to the legal obligations and the protection of the rights of the Company or of the persons involved, as well as the reputation of the whistleblowers.

13. FINALPROVISIONS

The Code is approved by the Company Board of Directors.

Any future updates, due to regulatory adjustments or the evolution/modification of the Company's business, will be approved by the Board of Directors and promptly disseminated to all recipients.

Version September 2021

Aluberg S.p.A.

GENERAL MANAGER

