

Code of Ethics

Viplastic has been manufacturing plastic products since 1964. Honesty, transparency, innovation, social and environmental responsibility are the values, the result of a strong and recognized cultural identity, with which Viplastic identifies. This identity, born from the entrepreneurial style of the founders, has gradually strengthened in more than 50 years of traditions, experiences and behaviors, becoming one of the fundamental resources of the Company. Today, the growth of the business means that Viplastic finds itself operating in a variety of contexts in continuous and rapid evolution. Due to the complexity of this scenario, it is important for Viplastic to strongly reaffirm its culture, clearly defining the set of values in which the Company recognizes itself and that it shares, together with the responsibilities that it assumes both internally and externally. A fundamental tool in this process of disclosure and clarification of the company's principles is this "Code of Ethics"

1.1 What is "Ethics"?

"Ethics" expresses the set of rules of conduct – both public and private – followed by a person or a group of people. It is a word used in many contexts, and indicates a reflection on rules and principles to be followed in practical life. The range of action of ethics, therefore, while referring to an abstract universe (made up of principles and values), is anything but theoretical: it concerns everyday life and translates into norms of behavior. In the words of the philosopher Immanuel Kant, one can define as "ethical" the behavior of one who acts, guided not by fears of punishment or hopes of opportunistic reward, but by his own reason "in such a way as to treat humanity, both in his own person and in that of everyone else, always together as an end, never simply as a means to an end."

1.2 Business Ethics

When reflection on ethics shifts from individual action to a broader organizational and business context, the concept of individual responsibility and awareness is inevitably linked to that of "Corporate Social Responsibility" or "Corporate Citizenship". For Viplastic, Corporate Social Responsibility is the ability to integrate its business activities with respect and protection of the interests of all partners and individuals with whom it relates, with the protection of environmental resources and their conservation for future generations. In other words, Viplastic's action is aimed at pursuing its business by considering the respect due to all living beings and the value of inanimate things, as the end of its action and not as a means to achieve profit.

1.3 The Code of Ethics

In the business environment, the absence of an ethical consideration of one's actions could lead to "potentially opportunistic" behavior, dictated by the mistaken belief that one is doing the good of the Company. Therefore, the value of a Code of Ethics aimed at reaffirming that in no way can the conviction of acting for the benefit of the Company justify the adoption of behaviors in contrast with shared principles and values. The following document does not serve to increase the degree of compliance with the law or the reputation of Viplastic, because legal responsibility, compliance with the law and fairness – such as the quality of the products – are an essential condition for the very existence of the Company, and therefore cannot be considered objectives of a Code of Ethics. The primary objective of the Code of Ethics is to make common and widespread the values in which the Company recognizes itself, at all levels, ensuring that everyone, whenever called upon to make a decision, clearly remembers that it is not only their own interests, rights and duties that are at stake, but also those of others. In other words, we must be aware that the well-being and respect of all must always and explicitly be taken into account at every stage of daily action.

1.4 Sharing the Code of Ethics

This document is intended to be, therefore, a rational incentive to try to understand not only what is right to do, but also "why" it is necessary to do it. The primary objective is to ensure that an ethical evaluation is also introduced, both in deciding one's own behaviors and in evaluating those of others, thus uniting the moral sphere with the managerial one, individual responsibilities with those of the Company and the personal sphere with the organizational one: that is, translating reasoning into concrete ethical action. This document must be a "moral contract" signed by all Company Representatives, external collaborators and suppliers of the Group. It must become a personal moral bond. It will not directly strengthen the competitive position, but it will do so indirectly if it allows everyone to adopt an ethical vision and a shared culture.

2. Values

Viplastic is a company that has been led by the same family for two generations, which is why it has a strong identity that has always been based on a human and professional "style" made up of correct behavior, a balance between respect for people and interest in the company. Practices and scenarios change, but consistency with these values is and will remain the best business card. Viplastic considers the UN Universal Declaration of Human Rights, the International Labour Conventions and Recommendations issued by the ILO (International Labour Organization), the Earth Charter drawn up by the Earth Council and the principles enunciated in the Global Compact proposed by the UN as essential points in the definition of its values.

2.1 Honesty and Transparency

Honesty is the fundamental principle for all Viplastic's activities, its initiatives, its products, its reports and its communications and is an essential element of the company's management. Relations with stakeholders, at all levels, must be based on criteria and behaviours of fairness, consistency, loyalty and mutual respect. Viplastic

communicates in a clear, transparent, accurate and timely manner with its stakeholders.

2.2 Social responsibility

Viplastic believes that its business activity, in order to qualify as ethically responsible, must pursue production models that respect and safeguard human rights, the regenerative capacities of the Earth and the well-being of communities, promoting human development in a fair and sustainable way, in the awareness that social and ethical responsibility also extends to communities, especially in developing countries, which produce raw materials used for some products.

2.3 Person-centeredness – Diversity and Inclusion (D&I)

In line with its ethical vision, Viplastic intends to develop the value of every person, respecting their physical, cultural and moral integrity, as well as the right to interact and associate with others. Viplastic pays attention to all aspects of people's lives, as it is human life that inspires all of society's activities. Viplastic supports and respects human rights in its activities and sphere of influence, offers equal opportunities for the development of its people and protects their privacy. Viplastic believes that doing the right thing is right for business and that respecting diversity and promoting inclusion can be a source of competitive advantage, creating a more motivated workforce to make the best decisions, based on a deep understanding of the people who buy and consume the company's products around the world. Viplastic does not tolerate any form of discrimination or exclusion, including age, culture, ethnicity, nationality, religious beliefs, race, political opinion, marital status, pregnancy, veteran status, gender and sexual orientation, gender and/or gender expression, genetic information, health or disability.

2.4 Labour protection

Viplastic guarantees workers' freedom of association and recognises the right to collective bargaining. It undertakes not to use, even

indirectly, both forced and compulsory labour and child labour. Rejects any discrimination on the basis of age, sex, sexuality, state of health, race, nationality, political opinions and religious beliefs; It rejects all forms of discrimination in recruitment policies and human resources management. Viplastic is committed to preventing all forms of mobbing and exploitation of labour, both direct and indirect, and to recognising merit, work performance and professional potential as the decisive criteria for salary and career development.

2.5 Environmental protection and animal welfare

Viplastic's commitment to the Earth is aimed at safeguarding its abundance and beauty for present and future generations, with the aim of transmitting to them the values and traditions that support the long-term development of human and environmental communities. Viplastic is committed at every stage of its actions to applying precautionary criteria – the "Precautionary Principle" – and a preventive approach to the environment and its biodiversity; to promote initiatives for greater corporate environmental responsibility; to develop the use of means and technologies that do not harm the environment. Both in the choice of raw materials and in the distribution of products. Viplastic's commitment to safeguarding the planet and the well-being of present and future generations also includes animal welfare. Viplastic, in fact, does not test its products or raw materials on animals, nor does it finance or support, directly or indirectly, animal testing, unless this is strictly necessary by order of the competent authorities or is imposed by laws, regulations or safety requirements. Viplastic discourages its suppliers from the use of animal testing and strongly supports the use of alternative methods to animal testing.

2.6 Compliance with applicable laws, codes and regulations

Viplastic considers compliance with national and international regulations to be a binding and essential condition for its actions. It is therefore committed, also with careful prevention of the consummation of illicit acts, to comply with these regulations as well

as generally recognized practices. It also inspires its decisions and behaviour to possible changes in the regulatory framework.

3 Norms and Standards of Conduct

3.1 Relations with stakeholders

Relations with stakeholders, at all levels, must be based on criteria and behaviours of absolute fairness, collaboration, loyalty and mutual respect. Viplastic considers as its stakeholders: Company representatives and external collaborators, customers, suppliers, competitors, public administration, product buyers, communities, local communities, mass media.

3.2 Marketing and Communication

It is necessary to consider the purchasers of Viplastic products as real interlocutors: "persons" who have the right to receive all the information necessary to make an informed choice at the time of purchase, and not just as simple "consumers" of the product. In order to achieve its business objectives, Viplastic has the duty to: guarantee stakeholders a relationship based on trust and loyalty.

3.3 Information and reporting

All information and dialogue activities with stakeholders must be clear, transparent, timely, complete and consistent, while respecting the right to information. Each employee is required to cooperate so that management facts are correctly and promptly represented in the accounts on the basis of true, accurate, complete and verifiable information. Every operation and transaction must be properly recorded, authorized, verifiable, legitimate, consistent and congruous. It is the responsibility of each employee to ensure that the supporting documentation is easily traceable and sorted according to logical criteria. No false or artificial accounting entry may be entered into the Company's (or Group's) accounting records for any reason. No

employee may engage in activities that result in such wrongdoing, even at the request of a superior.

3.4 Internal control

Viplastic recognises the utmost importance to internal control, understood as a process, carried out by Company Representatives, aimed at facilitating the achievement of company objectives, safeguarding resources, ensuring compliance with applicable laws and regulations, and preparing reliable, truthful and correct financial statements and economic and financial data. To this end, Viplastic has created and developed over time a set of tools, procedures and mechanisms suitable for managing the operation and monitoring of the organization. Well aware that the internal control system is an element that characterizes the good management of the Company, Viplastic is committed to working so that the sensitivity of personnel to the need for control can be increased at all organizational levels. At the same time, all Company Representatives must feel responsible for updating and managing an effective internal control system. For this reason, management must not limit itself to participating in the control system within the scope of its competences, but must commit to sharing its values and tools with each employee or colleague. Everyone must feel responsible for safeguarding the Company's assets (whether tangible or intangible) and for their correct use. You are prohibited from misusing or damaging the Company's assets and resources and allowing others to do so

3.5 Corruption and bribery

Viplastic is committed to implementing all necessary measures to prevent and avoid corruption and bribery. It is not allowed to pay sums of money, other forms of corruption in order to procure direct or indirect advantages to the Company itself. It is forbidden to accept gifts or favors from third parties that go beyond the normal rules of hospitality and courtesy. This applies whether a Company Representative pursues an interest other than the company's mission or personally takes advantage of business opportunities.

3.6 Diligence and fairness in the management of contracts

Contracts and work assignments must be carried out in accordance with the parties' knowingly agreed upon. For the proper management of contractual relationships, Viplastic undertakes not to exploit positions of dominance with respect to its counterparties and to guarantee extensive and exhaustive information to all employees and collaborators involved in the activities envisaged by the contracts stipulated.

3.7 Protection of Information

Viplastic recognizes that digital intangibles have become increasingly important over time and considers information security, and compliance with the related principles of confidentiality, integrity and availability of data, as an integral part of its activities. Viplastic is committed to protecting its information systems from unlawful access and unauthorized disclosure of the information processed, while ensuring full compliance with applicable personal data protection regulations and information security standards

4 Indication of implementation and control procedures

4.1 Scope of the Code of Ethics

The recipients of the Code of Ethics are all Company Representatives, without exception, and all those who, directly or indirectly, permanently or temporarily, establish relationships or relationships with Viplastic and work to pursue its objectives. Every Company Representative, external collaborator, consultant, supplier, customer is obliged to comply with this Code of Ethics and must explicitly accept it. Viplastic also requires the main suppliers and partners to conduct themselves in line with the general principles of this Code, considering this aspect of fundamental importance to pursue an ethically

responsible production model. Viplastic's Company Representatives are obliged to be aware of the rules, refrain from conduct contrary to them, contact their superiors or the Supervisory Body or the Group Ethics and Compliance Committee for clarifications or complaints, collaborate with the structures responsible for verifying violations and not hide the existence of a Code from their counterparts. In business relationships, counterparties must be informed of the existence of rules of conduct and must comply with them. Compliance with the provisions of the Code is an essential part of the contractual obligations of all employees pursuant to art. 2104 of the Italian Civil Code.

Viplastic, through its Company Representatives, is committed to collaborating with every Public Authority, to fostering a corporate culture characterized by awareness of existing controls and a mentality oriented towards the exercise of control. It will also seek to deepen and update the Code of Ethics in order to adapt it to the evolution of civil sensitivity and regulations of relevance to the Code of Ethics itself. In particular, management is required to comply with the Code when proposing and implementing the company's projects, actions and investments, and the members of the Board of Directors, in setting business objectives, must be inspired by the principles of the Code. Those who hold positions of responsibility in Viplastic (the top management) are in fact required to set an example for their employees, to direct them to comply with the Code and to encourage compliance with the rules. They must also report to the Body in charge all useful information about any deficiencies in controls, suspicious behaviour, etc., and modify the control systems of their function on the instructions of the Body itself.


4.3 Reporting violations of the Code of Ethics

Viplastic has activated appropriate communication channels, consisting of specific e-mail addresses, through which co-interested parties can address their reports regarding the application or violations of the Code. Alternatively, all co-interested parties may report, in writing and anonymously, any violation or suspected violation of the Code of Ethics to the Committees responsible for supervising the implementation of the Code itself. Consequently, the person in charge:

- provides an analysis of the report, providing feedback to the whistleblower and listening, when necessary, to the person responsible for the alleged violation;
- acts in such a way as to protect whistleblowers against any type of retaliation, understood as an act that may give rise to even the mere suspicion of being a form of discrimination or penalization;
- ensures the confidentiality of the identity of the whistleblower, without prejudice to legal obligations;
- in the event of an ascertained violation of the Code of Ethics, report the report and any suggestions deemed necessary to the top management or departments concerned, depending on the seriousness of the violations;
- these define the measures to be adopted in accordance with the regulations in force and according to the disciplinary system adopted by the Company; oversee its implementation and report the outcome to the Committee responsible for monitoring the Code of Ethics.

4.4 Communication and dissemination of the Code of Ethics

Viplastic undertakes to promote and guarantee adequate knowledge of the Code of Ethics by disseminating it to the co-interested parties through specific and adequate communication activities. In order for anyone to conform their behaviour to those described herein, Viplastic will ensure an adequate training programme and continuous awareness of the values and ethical standards contained in the Code.


The Management