



CODE OF ETHICS

MG Lavorazione Materie Plastiche S.p.A.





Code of Ethics



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1. INTRODUCTION

1.1 MG Lavorazione Materie Plastiche s.p.a. (the "**Company**"), is a joint-stock company mainly active in the production, transformation and marketing of high-performance flexible plastic films.

This code of ethics (the "**Ethical Code**"), approved by a resolution of the Board of Directors, represents one of the main instruments of corporate governance and administration of the Company, as it contains the ethical principles, in regulatory terms, that originate from a heritage of values and life experience that inspire the Company in the performance of all its business activities. In fact, it has been conceived and organised as a tool capable of orienting and substantiating the activities of every director and every other employee of the Company, in order to enable them to pursue the mission embraced by the Company.

1.2 The values to which the company has chosen to follow are impartiality, ethics in business, fairness and equity in labour relations at all levels, and respect for and protection of the Environment through an active approach. In particular, from the perspective of human resources, the Values include ensuring health and safety at work, fair working conditions and respect for human rights. The Company is conducted in a socially responsible, impartial and ethical manner, adopting fair practices in the management of labour relations, guaranteeing the safety of workers, implementing fair working conditions and respect for Human Rights, promoting and encouraging ecological awareness and complying with applicable laws. Values are disseminated through appropriate policies.

1.3 All business relationships are - and must be - characterised by integrity and loyalty and must be conducted without any conflict between corporate and personal interests. To achieve this objective, the Company requires that all those who work in it, without any exclusion, in the performance of their duties, respect the highest standards of business conduct, acting with loyalty, seriousness, honesty, competence and transparency, in compliance with the laws and regulations in force, safeguarding the reputation of the Company.

1.4 For this reason, the Company has decided to adopt this Code of Ethics, which, in line with the principles of loyalty and honesty, is intended to regulate, through rules of conduct, the activities of the company itself, establishing the general principles that the entire corporate structure must respect.

1.5 Consequently, the Company undertakes to:

- i. ensure the widest dissemination of the Code of Ethics throughout the Company and among all Addressees (as defined below);
- ii. ensure that all updates and amendments are also promptly brought to the attention of all Addressees;



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- i. provide adequate training and information support to all Addressees, making available to them adequate support in case of doubts concerning the interpretation of the Code of Ethics
- ii. ensure that anyone who reports violations of the Code of Ethics is not subject to any form of retaliation;
- iii. provide for and apply fair sanctions, commensurate with the type of violation of the Code of Ethics and applied consistently to all directors and other employees (and, where applicable, to third parties)
- iv. periodically verify compliance with the provisions of the Code of Ethics.

1.6 The Company encourages suggestions from employees and third parties on the contents of the Code of Ethics, its application and related topics.

1.7 The Company undertakes to ensure that these commitments are shared by consultants, suppliers and any other person having business relations with the Company at all times. The Company neither establishes nor continues business relations with third parties who refuse to respect the principles of the Code of Ethics.

1.8 The Code of Ethics constitutes a fundamental element of the Organisation Model adopted by the Company, through which the Company intends to recognise the legal relevance and mandatory effectiveness of the ethical principles and behavioural standards described herein, also with a view to preventing corporate offences.

1.9 The Code of Ethics consists of five sections:

- a first section ("SCOPE OF APPLICATION") indicating the Addressees of the Code of Ethics;
- a second section ("GENERAL PRINCIPLES") indicating the general ethical principles that identify the reference values in the Company's activities;
- a third section ("RULES OF CONDUCT") indicating the rules of conduct dictated for the Addressees;
- a fourth section ("GRIEVANCE PROCEDURES") explaining what the Grievance procedure is and how it works;
- a fifth section ("COMMUNICATION, DIFFUSION, MONITORING AND UPDATING THE CODE OF ETHICS") that regulates the communication, training and implementation of the Code of Ethics and its monitoring and control.



2. FIELD OF APPLICATION

2.1 The Code of Ethics constitutes a reference document for the Company.

2.2. The following are required to comply with the Code of Ethics

- each employee (fixed-term or otherwise), manager, collaborator (in any para-subordinate form) of the Company (the 'Personnel')
- members of the various corporate bodies of the Company
- consultants (with any type of contract or assignment), intermediaries, agents and third party suppliers of products or services of the Company,

all collectively referred to as 'Addressees'.

2.3 All Addressees are therefore bound to observe and, as far as they are concerned, enforce the principles contained in the Code of Ethics. In no case does the claim of acting in the interest of the Company justify the adoption of conduct in contrast with that set out in this document.

2.4 The Code of Ethics is valid both in Italy and abroad.

2.5 Compliance with the rules of the Code of Ethics must, in particular, be considered an essential part of the contractual obligations of the Company's employees pursuant to and for the purposes of Article 2104 et seq. of the Civil Code.

Violation of the rules of the Code of Ethics damages the relationship of trust established with the Company and may lead to disciplinary actions and compensation for damages, without prejudice to compliance with the procedures set forth in Article 7 of Law no. 300 of 20 May 1970 (the so-called Workers' Statute), collective labour agreements and corporate regulations adopted by the Company.



3. GENERAL PRINCIPLES

3.1 Reciprocity

This Code of Ethics is based on an ideal of cooperation for the mutual benefit of the parties involved, respecting the role played by each. The Company requires each stakeholder to act towards it according to principles and rules inspired by a similar idea of ethical conduct.

3.2 Responsibility and compliance with laws

The Company fully complies with the laws, regulations and, in general, the regulations in force in Italy and in all the countries in which it carries out its activities or has relations. Under no circumstances is it permitted to pursue or realise the interests of the Company in violation of laws or to abuse its position.

3.3 Fairness

The Company promotes respect for the principle of fairness both in intra-company relations and in relations between the Company and third parties. Every operation and/or transaction must be legitimate, duly authorised, consistent, congruous, documented, recorded and verifiable and traceable at any time, also in order to counter the phenomena of money laundering, self-laundering and receiving stolen goods.

3.4 Fraud

The Company does not accept fraud committed by its employees and directors. Under no circumstances are deliberate acts of deception aimed at securing a personal advantage permitted.

3.5 Corruption, extortion and extortion

The Company discourages and does not accept corruption, extortion and bribery. Under no circumstances are abuses of power and responsibilities entrusted for private gain, whether financial or non-financial.

3.6 Conflict of interest

The Addressees must act correctly in order to avoid situations of conflict of interest, or situations in which the pursuit of their own interest conflicts with that of the Company. Furthermore, situations must be avoided through which an employee, a director or other Addressee may gain an undue advantage and/or profit from opportunities known in the course of and by reason of the performance of his or her activities.

3.7 Impartiality and protection of human rights

The Company promotes the protection of inviolable human rights and rejects and repudiates any principle of discrimination based on gender, sexual orientation, nationality, religious beliefs, ethnicity, personal and political opinions, age, health and economic conditions.



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3.8 Prevention of child labour

The Company rejects forced and child labour and any kind of harassment (physical, verbal, sexual or psychological), abuse, threats or intimidation in the workplace, thus guaranteeing respectful working conditions, including in terms of working hours and wage determination.

3.9 Anti-discrimination and inclusion policy

The Company does not allow any form of discrimination to workers on the basis of ethnic origin, religion, gender, marital status, maternity status, age, political thought, nationality and sexual orientation, guaranteeing fair treatment for all and promoting every possible initiative aimed at fostering and improving inclusion and collaboration between people.

Personnel decisions are based exclusively on the individual and work ability of each worker. The Company does not allow corporal punishment, threats of violence or other forms of mental or physical coercion. It does not use public warnings, whether they are in written, electronic, verbal or any other form.

3.10 Remuneration

The Company is committed to respecting the staff's right to a decent wage, and ensuring that the salary paid for a normal working week, excluding overtime, always corresponds at least to legal or minimum industry standards, or collective agreements (where applicable). To this end, an attendance system is in place to protect the employee with respect to working hours and payment due.

3.10 Honesty

Addressees must be aware of the ethical significance of their actions and must not pursue personal or corporate gain in violation of applicable laws and the rules of this Code of Ethics.

3.11 Money laundering

The Company does not accept that its employees and directors come into contact with illegally or dishonestly obtained money, nor does it accept to launder it, hiding it within legitimate business activities with the aim of making it appear legal.

3.12 Integrity

The Company neither approves nor justifies any act of violence or threat aimed at obtaining conduct contrary to the regulations in force, including the Code of Ethics and ethical precepts.

3.13 Transparency

The principle of transparency is based on the truthfulness, accuracy and completeness of information both inside and outside the Company. In compliance with the principle of transparency, every operation and/or transaction must be correctly recorded, traceable, authorised, verifiable, legitimate, consistent and congruous.

3.14 Efficiency

Economy in the management and use of company resources must be pursued in all work activities, in compliance with the most advanced quality standards. The Company is also committed to safeguarding the company's resources and assets, as well as to managing its assets and capital by taking all the necessary precautions to ensure full compliance with the laws and regulations in force.

3.15 Protection of privacy



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The Company is committed to protecting the privacy of the Addressees in compliance with the regulations in force, in order to avoid the communication or dissemination of personal data without the consent of the person concerned. The acquisition and processing, as well as the storage of information and personal data of Personnel and other subjects at the disposal of the Company is carried out in compliance with specific procedures aimed at preventing unauthorised persons and/or entities from gaining knowledge thereof.

3.16 Value of human resources

Human resources are recognised as a fundamental and indispensable factor for business development.

The Company protects professional growth and development in order to increase the wealth of skills possessed, in compliance with the regulations in force on individual personality rights, with particular regard to the moral and physical integrity of Personnel.

The Company favours the creation and maintenance of a work environment that, inspired by respect, fairness and collaboration, allows the involvement and empowerment of employees and collaborators. It also undertakes not to favour forms of clientelism and nepotism, and not to establish any working relationship with persons involved in acts of terrorism.

Employees are hired exclusively on the basis of regular employment contracts, as no form of irregular employment is tolerated. The new employee must be made aware of all features of the employment relationship.

Recognition of salary increases or other incentive tools and access to roles and positions of greater responsibility are linked, in addition to the rules established by law and by the collective agreement, to the individual performance of employees, as well as to the expression of organisational skills through behaviour based on the Company's ethical principles, indicated in this Code of Ethics.

3.17 Fair competition

The Company promotes free and fair competition, inspired by the principles of fairness, loyalty and transparency towards competing companies. In particular, the Company is required to independently establish its own commercial policy and not to set any price in agreement or in collusion with its competitors; not to share customers, territories or markets in agreement or in collusion with their competitors and to establish fair relations with their customers and suppliers in compliance with the laws governing competition.

3.18 Protection of the individual personality

The Company recognises the need to protect individual freedom in all its forms and rejects any manifestation of violence, especially if aimed at restricting personal freedom, as well as any phenomenon of prostitution and/or child pornography.

The Company undertakes to promote, within the scope of its activity and among Addressees, the sharing of the same principles.

3.19 Protecting health and safety in the workplace

The Company pursues with the utmost commitment the objective of guaranteeing health and safety in the workplace by acting in compliance with current health and safety regulations. In this regard, the Company is obliged to take the most suitable measures to avoid the risks connected with work activities and, where this is not possible, to adequately assess the existing risks.



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3.20 Equal opportunities and meritocracy

The Company values the principle of equal opportunities in all aspects of the employment relationship (recruitment, training, assignment of benefits, career advancement, disciplinary proceedings, termination of employment, retirement), without distinction on the basis of ethnic origin, gender, sexual orientation, religion, nationality, age, political opinions, marital status, different physical or mental abilities or any other status or personal characteristic.

With a view to enhancing the value of people, the Company applies a performance evaluation system that measures the skills implemented to achieve the objectives assigned, from a meritocratic perspective.

3.21 Internal and external sustainability processes

The Company is aware of the 'responsibility of companies for the impacts they have on society' and the necessary contribution it is called upon to make to create winning values, both tangible and intangible, for people, the territory and the environment. Strongly convinced that ethics is the basis of corporate social responsibility, the Company has decided to reinterpret its Code of Ethics also in terms of sustainability and corporate social responsibility throughout the organisation and in its relations with stakeholders through the adoption of good practices that directly involve employees, customers, suppliers and the community. With regard to its employees and collaborators, it promotes a work-life balance policy by seeking to fulfil personal and seriously motivated requests, in the context, however, of the organisational and production logics proper to the manufacturing world to which it belongs; it implements solutions aimed at promoting the comfort and quality of the working environment; depending on the company's results, it defines a performance bonus for all collaborators.

The company is also attentive to the needs of the community of which it is a part, and is committed to supporting social solidarity initiatives, also evaluating possible future collaborations with high schools aimed at including in the workforce young recruits to be trained and prepared for the profession. Attention to environmental issues has led to the adoption of specific energy saving policies, implemented by monitoring consumption and through waste disposal procedures that at the same time enhance the recovery and recycling of materials.

Moreover, when choosing the supplier to whom to entrust a contract or with whom to sign a supply contract, it assigns a higher value to suppliers who adopt sustainability practices in terms of both production and customer management and service.

The implementation and development of all these practices expresses the company's desire to constantly seek a balance between competitiveness, ethics, stakeholder interests and environmental protection, with a view to sustainable development.

3.22 Relations with the community and environmental protection

The Company recognises the fundamental importance of environmental protection in guaranteeing a coherent and balanced 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 technologies available and the constant monitoring of company processes.



3.23 Relations with local authorities and public institutions

The Company pursues the objective of the utmost integrity and correctness in relations, including contractual relations, with public institutions and, in general, with the Public Administration, also with regard to the request and/or management of public funds, in order to guarantee the utmost clarity in institutional relations, in harmony with the need for organisational and managerial autonomy of any economic operator.

Relations with institutional interlocutors are maintained through the persons appointed for this purpose. Furthermore, should the Company avail itself of a consultant or a 'third party' to represent it in relations with the Public Administration, the latter shall be required to comply with the principles of the Code of Ethics, as well as the Company's Anti-Corruption Procedure. The Company must not be represented, in relations with the Public Administration, by a consultant or a "third party", if there is a conflict of interest, even if only potential.

With particular regard to participation in tenders, the Company operates according to the principles of fairness, transparency and good faith. When examining a call for tenders, it assesses the adequacy and feasibility of the services and fairness. The Company maintains clear and correct relations with Public Administration officials. If a tender is awarded, the Company shall guarantee the clear and correct implementation of the provisions of the relevant call for tenders, the diligent fulfilment of contractual obligations also with respect to the third parties involved.

3.24 Relations with associations, trade unions and political parties

The Company does not make direct or indirect contributions to finance political parties, movements, committees and political and trade union organisations, or their representatives or candidates. Furthermore, the Company does not finance associations or sponsor events or congresses whose purpose is political propaganda.

3.25 Contributions and sponsorships

The Company may accept requests for contributions, limited to proposals from organisations and associations governed by statutes that explicitly state that they are non-profit-making and whose object is of high cultural or charitable value.

Sponsorship activities, which may relate to social, environmental, sports, entertainment and art issues, are intended exclusively for events or entities that offer a guarantee of quality and against which any possible conflict can be excluded.

3.26 Rejection of all forms of terrorism

The Company repudiates all forms of terrorism and intends to adopt, within the scope of its activities, appropriate measures to prevent the danger of involvement in terrorist events, undertaking not to establish any relationship of a working or commercial nature with subjects, whether natural or legal persons, involved in acts of terrorism, and not to finance or in any way facilitate any of these activities.

3.27 Repudiation of criminal organisations

The Company repudiates all forms of criminal organisations (in particular mafia-type associations), both national and transnational in nature. The Company is required to adopt appropriate measures to prevent the danger of its own involvement or that of its employees in relations and activities in any capacity and in any way, even in the form of mere assistance and aid, with such organisations.



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To this purpose, the Company does not establish any relationship of a working, collaborative or commercial nature with persons, be they natural or legal persons, directly or indirectly involved in criminal organisations or, in any case, linked by kinship and/or affinity ties with exponents of known criminal organisations, nor does it finance or, in any case, facilitate any activity referable to such organisations.

3.28 Protection of industrial and intellectual property rights

The Company respects the regulations on the protection of trademarks, patents and other distinctive signs and on copyright and, therefore, does not allow the use, for any reason and for any purpose, of products with trademarks, counterfeit signs or the manufacture or marketing or, in any case, any activity concerning products already patented by third parties and over which it has no rights. Intellectual property, trademarks, logos, copyrighted materials, trade secrets and other confidential internal information, including business plans and strategic projects, marketing, pricing and sales data, commercial and organisational details, are extremely valuable assets on which the Company's competitive strength is based. The Company also encourages and promotes the innovation and evolution of the services offered and processes carried out by its employees and third parties who provide their services to the Company.

3.29 Cooperation with the Authorities in case of investigations

The Company recognises the value of the judicial and administrative function and pursues the objective of maximum integrity and fairness in relations with the competent authorities. To this purpose, it prohibits any conduct aimed at or capable of interfering with investigations or assessments carried out by the competent Authorities and, in particular, any conduct aimed at obstructing the search for the truth, also by inducing people called upon by the judicial authorities not to make or to make false statements.

The Company undertakes to adopt all necessary measures to provide the cooperation requested by the Authorities, within the limits of compliance with the regulations in force.

3.30 Correct use of computer systems

The Company pursues the objective of the correct use of computer or telematic services, in order to guarantee the integrity and authenticity of the data processed, to protect the interests of the Company and of third parties, with particular reference to public authorities and institutions.

3.31 Information Security

The Company upholds and guarantees the security of information, and therefore securely collects, processes and stores information used for business purposes.

3.32 Relations with private individuals

The Company considers it a fundamental and essential value that relations with private individuals (suppliers, contractors, subcontractors, consultants, business partners, etc.) are marked by the utmost loyalty, integrity, fairness and good faith.

3.33 Protection of share capital and creditors

One of the central aspects that ethically qualify the conduct of the Company in general is the observance of principles of conduct aimed at guaranteeing the integrity of the share capital, the protection of creditors and third parties that establish relations with the Company, and, in



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general, the transparency and correctness of the Company's activities from an economic and financial point of view.

3.30 Quality of services and products

The company directs its activities towards the satisfaction and protection of its customers by listening to requests that may favour an improvement in the expected quality of services and products.



4. RULES OF BEHAVIOUR

4.1 Principles and rules of conduct for members of corporate bodies

4.1.1 The corporate bodies, in awareness of their responsibility, in addition to complying with the law, the regulations in force and the Articles of Association, are required to comply with the provisions of the corporate Organisational Model and the Code of Ethics that forms part of it.

4.1.2 Their members are required to:

- i. behave with autonomy, independence and fairness towards public institutions, private entities, associations, political forces, as well as any other national and international operator;
- ii. behave with integrity, loyalty and responsibility towards the Company;
- iii. ensure informed participation in the meetings and activities of the corporate bodies
- iv. assess situations of conflict of interest or incompatibility of functions, offices or positions external and internal to the Company, refraining from performing acts in situations of conflict of interest within the scope of one's activity
- v. not hinder in any way the control and/or auditing activities carried out by shareholders, other corporate bodies, or the auditing company, if appointed;
- vi. make confidential use of the information they become aware of for official reasons, avoiding using their position to obtain personal advantages, whether direct or indirect. Any external communication activities must comply with laws and conduct practices and must be able to safeguard price-sensitive information and all information covered by trade secrets
- vii. comply, within the limits of their competencies and responsibilities, with the rules of conduct for Personnel referred to in paragraph 4.2 below (Principles and rules of interest of the Company).

4.2 Principles and Rules of Conduct for Personnel and Persons Performing Activities in the Interest of the Company

4.2.1 Personnel and people carrying out activities in the interest of the Company must conform their conduct, both in internal relations and in relations with interlocutors external to the Company, to current legislation and, above all, to the principles of the Company Organisational Model and this Code of Ethics.

4.2.2 With reference to the corporate Organisational Model, it is necessary to

- avoid engaging in conduct that could constitute any of the offences, including those indicated in the company regulations, including the Code of Ethics;
- make the communications required by this Code of Ethics;
- report to the contacts identified (see Section 6.2) any malfunctions or violations of the Company Organisational Model and/or the Code of Ethics.

4.2.3 Personnel and people carrying out activities in the interest of the Company may contact the members of the Board of Directors at any time, also for the sole purpose of requesting



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clarification and/or information on the matter, for instance on the interpretation of the Code of Ethics and/or other protocols relating to the Company Organisational Model.

4.2.4 In addition to the general provisions mentioned above, Personnel and people performing activities in the interest of the Company must also comply with the principles and rules of conduct set out below and concerning both issues considered of particular relevance from an ethical profile and specific sectors of the Company's activity.

4.3 Conflict of interest

4.3.1 Personnel and people carrying out activities in the interest of the Company must avoid carrying out or facilitating operations in conflict of interest - actual or potential - with the Company, as well as activities that may interfere with the ability to impartially make decisions in the best interests of the Company and in full compliance with the rules of this Code of Ethics. Furthermore, it is not permitted to pursue one's own interests to the detriment of the Company's interests, nor to make unauthorised personal use of Company assets.

4.3.2 In the event of a conflict of interest, even if only potential, Personnel and persons carrying out activities in the interest of the Company must communicate this circumstance to their hierarchical superior, refraining from carrying out any transaction.

4.4 Repudiation of all forms of corruption, both active and passive

4.4.1 The Company forbids Personnel and persons performing activities in its interest to offer, promise and give, even indirectly, money, gifts, goods, services or favours to Public Officials and/or Public Service Officials to influence their decisions, in view of more favourable treatment or undue services or for any other purpose, including the performance of acts of their office.

4.4.2 Likewise, it is forbidden to accept from them money or other benefits, whether financial or of any other nature, for the Company and/or themselves and/or third parties, if this is intended to influence the performance (or even the omission) of acts in breach of their professional obligations.

4.5 Relations with suppliers, contractors, contractual third parties and customers

4.5.1 Personnel and people performing activities in the interest of the Company must base their relations with suppliers, contractors, subcontractors and contractual third parties in general on the utmost fairness and transparency, in compliance with the laws and regulations in force, the Company's Organisational Model and Code of Ethics, as well as the internal procedures and, in particular, those relating to relations with customers and those relating to purchases and supplier selection.

4.5.2 In choosing its suppliers, contractors, subcontractors and third parties in general, the Company operates by adopting non-discriminatory and anti-competitive behaviour.

4.5.3 When choosing its suppliers, contractors or subcontractors and third parties in general,



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the Company, therefore, takes into account - in addition to economic convenience - the technical/economic capacity of its contractors, assessing their overall reliability with reference to the specific nature of the services to be rendered, in full compliance with the regulations in force.

4.5.4 Relations with suppliers, contractors and subcontractors and third parties in general are always governed by specific contracts, aimed at achieving maximum clarity in the regulation of the relationship.

4.5.5 All those who work in the company are required to adopt behaviours and procedures aimed at personalising and humanising relations with customers as well as improving accessibility and information on services.

4.5.6 In the context of the provision of services, all those working in the Company are required to act in compliance with the applicable rules (including ethical rules) to protect the rights of the customer, in particular, in accordance with the fundamental principles of equality, continuity, impartiality, and confidentiality.

4.5.7 All those working in the Company must scrupulously follow the procedures put in place by the Company itself, which outline the main processes to ensure an adequate and uniform level of service to all customers.

4.6 Privacy

4.6.1 Personnel and people carrying out activities in the interest of the Company must treat data, news and confidential information in their possession with absolute confidentiality, even after the termination of their employment, avoiding their dissemination or use for their own or third parties' speculative purposes.

4.6.2 Confidential information may only be disclosed, within the company, to those who actually need to know it for business reasons.

4.6.3 The Company operates in full compliance with the relevant Italian laws and European Directives. To this end, it has prepared its own Privacy Management Manual, which employees as well as external partners relevant to privacy must follow.

4.7 Health and safety at work

The Company's staff develops, in particular:

- i. take care of their own health and safety and that of other people in the workplace affected by their actions or omissions, in accordance with the instructions provided;
- ii. contribute, together with the employer, to the fulfillment of the required obligations;
- iii. observe the provisions and instructions given for the purposes of collective and individual protection;
- iv. correctly use work equipment, dangerous substances and preparations, means of transport and safety devices;
- v. use the PPE (personal protective equipment) made available to you appropriately;
- you. immediately reporting the shortcomings of the means and devices referred to in



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points iv) and v) above, and any dangerous condition of which he becomes aware, acting directly, in case of urgency, within the scope of his own competences, and without prejudice to the obligation referred to in the following point vii), eliminate or reduce situations of serious and imminent danger, communicating this to the workers' safety representative;

vii. do not remove or modify safety, signaling and control devices without authorization;

viii. take care of the PPE made available to you, without making changes to your initiative and reporting any defects or inconveniences;

ix. not carry out operations or maneuvers on their own initiative that do not fall within their competence or that could compromise their own safety or that of others;

X. participate in education and training programs organized by the employer;

xi. undergo the health checks required by current legislation or otherwise ordered by the competent doctor.

4.8 Anti-money laundering

4.8.1 The staff and natural people who carry out activities in the interests of the Company adopt all the tools and appropriate precautions to guarantee the transparency and accuracy of commercial transactions.

4.8.2 In particular, it is mandatory, among other things, that:

- i. the tasks conferred to any service companies and/or natural people who look after the economic/financial interests of the Company are drawn up in writing, with an indication of the contents and the agreed economic conditions;
- ii. the competent functions ensure control of the regularity of payments to all counterparties also by verifying the coincidence between the person to whom the order is made out and the person who collects the related sums;
- iii. the minimum requirements established and required for the purposes of selecting the subjects offering the goods and/or services that the Company intends to acquire are scrupulously respected;
- iv. with reference to the commercial/professional reliability of suppliers and partners, all the information necessary for the evaluation is requested and obtained;
- v. in the event of the conclusion of agreements aimed at making investments, maximum transparency is guaranteed;
- vi. correct and transparent behavior is maintained, in compliance with the laws and regulations in force, in the execution of all activities aimed at invoicing and the registration of invoices in the mandatory accounting records;
- vii. correct and transparent behavior is maintained, in compliance with the laws and regulations in force, in the compilation and subsequent submission of tax returns;
- viii. refrain from carrying out any operation aimed at avoiding the payment of taxes due on the basis of the tax return;
- ix. refrain from carrying out simulated or otherwise fraudulent operations aimed at allowing the evasion of income or value added taxes;
- x. the regular submission of tax returns is carried out and the tax is paid on time.

4.9 Use of computer systems

4.9.1 Employees and persons who carry out activities in the interest of the Company, in the



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performance of their professional activities, must use IT tools in full compliance with current regulations and internal procedures.

4.9.2 Personnel and entities carrying out activities in the interest of the Company must not upload unauthorized software onto company systems, nor make unauthorized copies of programs, licensed, for personal, business or third party use.

4.9.3 Personnel and persons carrying out activities in the Company's interest must use IT tools exclusively for professional purposes; consequently, the Company reserves the right to verify the contents of computers as well as the correct use of IT tools in compliance with company procedures, including those aimed at information security.

4.9.4 The staff and people who carry out activities in the interest of the Company are also obliged not to send threatening and abusive e-mails, not to use language that does not conform to the style of the Company, or in any case inappropriate language..

4.10 Respect for the environment

The Company considers the need to protect the environment a priority; therefore, it has adopted an environmental management system inspired by the following fundamental principles: do not pollute; constantly optimize the use of resources; develop services with ever less environmental impact; constantly increase the share of energy used deriving from renewable sources. Employees are required to give equal priority to the protection of the environment in the performance of their work activities.

4.11 Control and transparency of accounts

4.11.1 Accounting transparency is based on the truthfulness, accuracy and completeness of the basic information for the relevant accounting entries. Each member of the corporate bodies, whether a manager or an employee, is required to cooperate, within the scope of their responsibilities, to ensure that management facts are correctly and timely represented in the accounting records.

4.11.2 Behaviour likely to undermine the transparency and traceability of the budget is prohibited.

4.11.3 Each entry must reflect exactly what is stated in the supporting documentation. It is the responsibility of the staff responsible for drawing up the budget to ensure that this documentation is easily traceable and organized according to logical criteria.

4.12 Protection of corporation stock and creditors

4.12.1 Employees and external collaborators are required to comply with the rules established by law and internal company procedures, with the aim of protecting the integrity and effectiveness of the share capital (eg. in mergers, divisions, corporate acquisitions, distribution of profits and reserves) and not to damage the guarantees of creditors and third



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parties in general.

4.12.2 The Company ensures the regular functioning of its corporate bodies, guaranteeing and facilitating all forms of control over company management provided for by law as well as the free and correct formation of the will of shareholders; and; therefore, it requires strict compliance with internal procedures and, in any case, the adoption of behaviors consistent with this principle.

4.12.3 With particular reference to the preparation of the financial statements, the Company requires the verification of the truthfulness, accuracy and completeness of the basic information, considering the transparency of the accounting, financial statements, financial statements, reports and other corporate communications provided for by law and addressed to shareholders or the public, an essential principle in the conduct of business and guarantee of fair competition.

4.12.4 No concealment of information or any partial or misleading representation of economic, capital and financial data is permitted by the Company. Therefore, all internal and external collaborators involved in the production, processing and accounting of such information are considered responsible for the transparency of the Company's accounts and financial statements.

4.13 Principles and rules of conduct for Third Party Recipients

4.13.1 This Code of Ethics also applies to Third-Party Recipients (including but not limited to contractors, subcontractors, agents, collaborators in any capacity, consultants, suppliers, business partners).

4.13.2 The Third Recipients are, therefore, required to comply with the provisions of the Company Organizational Model and this Code of Ethics.

4.13.3 In the absence of an express commitment to comply with the rules of this Code of Ethics, the Company is required not to conclude or continue any relationship with the Third Recipient. To this end, a specific request for confirmation of the obligation to comply with this Code of Ethics will be included in the contractual agreements, and to provide, in case of violation, a timely notice, to, under penalty of applying sanctions or, again, termination or failure to enter into the contractual relationship.

4.14 Reporting Procedures

4.17.1 A report may be dependent on problems and/or issues that an internal stakeholder (employees) or external stakeholder (especially suppliers) experiences directly during its relationship with the Company. It can cover a wide range of situations ranging from potentially illegal activities to unethical, discriminatory, intimidating, victimizing or unsatisfactory interpersonal relationships.

4.17.2 To manage reports, the Company has made available procedures collectively called "reporting procedures", based on transparency, impartiality, confidentiality and accessibility;



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the details are illustrated in the procedure “Reporting procedure and Whistleblowing” adopted by the Company.



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5. DISTRIBUTION, MONITORING AND UPDATING OF THE CODE OF ETHICS

5.1 Communication and spreading of the Code of Ethics

5.1.1 The Company undertakes to ensure adequate internal and external distribution of the Code of Ethics.

5.1.2. Corporate bodies and staff are required to ensure:

- i. the dissemination of the Code of Ethics to all members of the corporate bodies and to all personnel;
- ii. the posting of the same in a place of the company headquarters accessible to all;
- iii. assistance in interpreting and clarifying the provisions contained in the Code of Ethics;
- iv. the design of systems for verifying the effective observance of the Code of Ethics.

5.1.3 The Code of Ethics can be consulted by the Recipients in an accessible place, in the most appropriate ways and in compliance with local rules and customs. The Code of Ethics is available on the website www.mg-spa.it from which it is freely downloadable.

5.1.4 The corporate bodies monitor the effective implementation of the Corporate Organizational Model, promote and monitor training initiatives on the principles of the Code of Ethics, and, structured differently and differentiated in view of the role played and the responsibilities assigned to the resources concerned.

5.1.5 With particular reference to Third Party Recipients and, in any case, to any other interlocutor, the Company also provides:

- to inform these subjects about the commitments and obligations imposed by the Code of Ethics, by delivering a copy;
- disseminating the Code of Ethics through company information systems;
- require them to respect the Code of Ethics;
- to sign clauses and/or statements contained and/or or attached to the related contracts aimed at formalizing the commitment to comply with the Company Organizational Model and the Code of Ethics and on the other hand to regulate the contractual sanctions that will be applied as a result of the breach of such commitment. The Company will take care of the definition and constant improvement of these clauses.

5.2 Reporting of possible violations of the Code of Ethics

5.2.1 If a person required to comply with the Company Organizational Model and this Code of Ethics becomes aware of a fact and/or circumstance suitable to supplement the danger of his violation, he will, it is required to report it promptly.



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The reporting can take place:

- by forwarding paper;
- “WB Officer”, persona esterna all’Azienda, independent of the same, dedicated to the management of reports (email address: wb-mq@studiolegalegozzi.it)

5.2.2 All operational details that must be adhered to in order for the reporting process to be effective, and the privacy of the persons involved to be respected, they are illustrated in the procedure “Reporting Procedure and Whistleblowing” prepared by the Company.

5.3 Violations of the Code of Ethics and related sanctions

5.3.1 The detected violations are managed in collaboration with the competent business functions. In the relevant cases, the administrative body of the Company is informed that defines the consequent measures to be taken, in accordance with the provisions of the relevant National Collective Contract and the Company Organizational Model.

5.3.2 With regard to Third-Party Recipients, any failure to comply with the principles and requirements of the Company Organizational Model and the Code of Ethics may result in the imposition of the sanctions of the warning, or the application of a penalty or termination of the contract.

5.4 Monitoring and updating of the Code of Ethics

The verification of the application and compliance with the Code of Ethics is carried out by the Board of Directors. The Code of Ethics is also subject to periodic review by the Council itself. It is understood that any changes and/or additions to this Code of Ethics must be made in the same manner as those adopted for its initial approval.