



**CODE OF ETHICS
AND
BEHAVIOUR**

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1 COMPANY PROFILE, MISSION AND STRATEGIES

MPG Manifattura Plastica S.p.A. is a company specialising in the production of thermoformed or injected plastic packaging for food use. In 1977, it was the first company in Italy to enter the market with thermoformed PP containers and, thanks to continuous investment in research and technology, it has been able to strengthen its position.

MPG Manifattura Plastica S.p.A.'s area of activity is the production of primary plastic packaging complete with accessories, from labels to 'tamper evident' closure systems of its own design. The production technologies used by MPG Manifattura Plastica are extrusion, thermoforming and injection.

MPG Manifattura Plastica S.p.A. is a company that implements internal management policies aimed at enhancing human capital and pays great attention to the environment, equal opportunities, innovation and legality.

MPG Manifattura Plastica S.p.A.'s mission is to develop its products, in sharing with customers and suppliers, through an approach of continuous improvement, thanks to an attitude that excludes preconceptions and prejudices.

MPG Manifattura Plastica S.p.A. is equipped with a certified quality management system, both according to the UNI EN ISO 9001:2015 international standard, which allows the control of the organisation, operating procedures, internal staff training and the quality of the services provided, and according to BRC/IOP, which manages the absolute hygiene of packaging for food use. MPG Manifattura Plastica S.p.A. was the first company to be ISCC PLUS certified for the production of rigid and recyclable packages with a low environmental impact, made without the use of fossil raw materials.

2 SCOPE OF APPLICATION AND RECIPIENTS

This "Code of Ethics and Behaviour" (hereinafter also referred to as the "Code"): shall be applied, at all times and without exception, by the administration and control bodies and by all persons linked by subordinate employment relationships with MPG Manifattura Plastica S.p.A. Suppliers and business partners of MPG Manifattura Plastica S.p.A., as well as external collaborators, are required to comply with the Code when dealing or acting in the name and on behalf or in the interest of MPG Manifattura Plastica S.p.A.

All these subjects, even if outside the Company, working, directly or indirectly, for MPG Manifattura Plastica S.p.A. (e.g. agents, collaborators in any capacity, consultants, suppliers, business partners, whatever the relationship that binds them to it), are hereinafter also referred to as 'Recipients'.

3 CONTEXT AND PURPOSE OF THE CODE

This Code of Ethics forms an integral part of the Organisational and Management Model adopted by MPG Manifattura Plastica S.p.A. for the purposes of Lgs.D. 231/01, containing, among other things, the general principles and behavioural rules to which the Company acknowledges a positive ethical value and with which all the Recipients of the Code must comply, guiding the various subjects on the lines of conduct to be followed and those to be avoided, identifying responsibilities and possible consequences in terms of sanctions.

The Code of Ethics is therefore intended to be the operational, behavioural and ethical reference for the recipients as identified in the previous paragraph.

The regulatory provision, referring to Lgs.D. 231/01 on the administrative liability of companies for offences committed by their representatives, employees and collaborators, has made it essential to codify the principles of legitimacy, loyalty, fairness and transparency, on the basis of which the conduct of all the subjects that operate with MPG Manifattura Plastica S.p.A. must be conformed.

In order to fully achieve the company's objectives, MPG Manifattura Plastica S.p.A. requires to always operate in a context of fair competition, with correctness and in good faith, respecting the legitimate interests of all the stakeholders of the Company: customers, shareholders, employees, Public Administration, suppliers and business partners.

It follows that all those who work with MPG Manifattura Plastica S.p.A. or on behalf of MPG Manifattura Plastica S.p.A. must comply with the company's ethical and behavioural principles, and enforce them within the scope of their functions and responsibilities.

The organisational model and internal procedures adopted by MPG Manifattura Plastica S.p.A. for the performance of its activities in general, and in particular, those mentioned in the following chapters, comply with the rules supplied by this Code.

4 DISSEMINATION AND TRAINING

MPG Manifattura Plastica S.p.A. undertakes to guarantee an accurate internal and external dissemination of the Code through one or more of the following methods:

- Distribution of the Code to all members of corporate bodies and to all employees;
- Posting in a place accessible to all;
- Making available to suppliers and Third-Party Recipients;
- Publication of the Code on the corporate website;
- Publication of the Code on the company's internal network.

The Management, in cooperation with the Supervisory Board, prepares and carries out periodic training initiatives on the principles of this Code and related matters.

Moreover, contracts with Third-Party Recipients (also referred to as 'Third Parties' only) shall include clauses aimed both at formalising the commitment to comply with the principles of the Model and this Code, and at regulating contractual sanctions in the event of violation of this commitment.

5 COMMITMENT FOR THE CODE

The Code is made available to all recipients through publication on the Company's website and, in addition, to all employees, through publication on the company's internal network, in order to enable all recipients and employees to take due note thereof and apply its principles. Employees will be required to sign a declaration that they have carefully read and understood the Code.

6 ETHICAL PRINCIPLES

This Code of Ethics of MPG Manifattura Plastica S.p.A. acknowledges, as far as relevant and applicable, and freely adapts the Code of Ethics of the trade association to which Confindustria belongs. The ethical and behavioural principles of Confindustria are primarily applicable to the Company's full-time employees and collaborators. In the next chapter, the ethical and behavioural principles functional to Italian regulations and consistent with the organisational model pursuant to Lgs.D. 231/01 are developed.

6.1 *General statements*

MPG Manifattura Plastica S.p.A. undertakes to communicate this Code of Conduct to its customers and to spread awareness of the duties and rules related thereto among the organisations where they operate. MPG Manifattura Plastica S.p.A. undertakes to inform the customer of any variation relating to the rules of the Code of Conduct that may occur during the fulfilment of the task-assignment.

6.2 *Integrity*

MPG Manifattura Plastica S.p.A., with its collaborators and employees, undertakes to

- a. Constantly maintain a behaviour inspired by sincerity, honesty and uprightness;
- b. Propose and accept task-assignments and orders with the awareness of having the necessary skills to perform the service and make the products;
- c. Not to influence the customers' choices with remuneration of any kind;
- d. Not to exert any commercial pressure aggressively or insidiously pursued by the sales network;
- e. Not to accept remuneration of any kind from its suppliers when proposing or recommending goods or services provided by them;
- f. Refrain from offering employment to the customer's personnel, either with MPG or with third parties, unless the application is proposed or anyway approved by the customer. Any unsolicited applications will be evaluated while ensuring customer protection and personnel confidentiality;

6.3 *Confidentiality*

MPG Manifattura Plastica S.p.A. undertakes not to disclose, without specific written authorisation, any information concerning customers' activities and interests, of which it may have become aware during the fulfilment of the task-assignment. This information is covered by professional secrecy and will be treated as strictly confidential even within the customer's organisation. Members may not use for their own benefit or for the benefit of third parties any information they may become aware of during the performance of their activities.

6.4 *Concreteness and effectiveness*

MPG Manifattura Plastica S.p.A. undertakes to convey customers the contents and methods of the service implementation in order to ensure the achievement of the objectives within the scope of the task-assignment. In assessing the objectives, MPG Manifattura Plastica S.p.A. must take into account short and long-term factors that may influence the service provided and the results achieved by the customer. The results should be communicated to the customer simply and effectively.

6.5 *Professional competence and fairness*

MPG Manifattura Plastica S.p.A. undertakes to:

- a. Pursue the goal of maximum customer satisfaction;
- b. Continuously and regularly provide the service defined in the offer and check the achievement of the set objectives with the customer at regular intervals;
- c. Operate solely in the customer's interest, with a strong sense of cooperation;
- d. Provide the customer with products and operators capable of satisfying his/her demands according to the skills considered necessary to supply the product offered;
- e. Refrain from accepting tasks/orders for which he/she is not able to ensure the necessary skills;
- f. Adapt its rates to the nature and quality of the service/product offered.

6.6 *Independence*

MPG Manifattura Plastica S.p.A. guarantees for itself and its collaborators independence from the customer and from Entities or Companies that may have interests or links with the customers. In carrying out its activities, MPG Manifattura Plastica S.p.A. must follow criteria of objectivity and consistency towards the objectives to be achieved by drawing inspiration from principles of equality among its customers and of equal dignity between consultant and customer.

6.7 *Child labour (C138 AND 182 ILO - R 146 IL)*

MPG Manifattura Plastica S.p.A. does not use child or forced labour, nor has it entered into contracts with suppliers or subcontractors who do.

The employment of persons under the age of 18 is prohibited, as work distracts them from attending school or any way does not allow them free time for leisure or play activities.

The purpose of this provision concerning child labour (included in the Code of Ethics) is to ensure that MPG Manifattura Plastica S.p.A.'s products are not manufactured by people who are denied the opportunities to receive an education and to live a life in keeping with the children's rights and allowing them to grow and develop in a healthy manner.

This provision also aims to prevent workers who have not reached maturity yet from being forced to work in environments that might prevent them from completing their development.

7 **RELATIONS WITH STAKEHOLDERS**

7.1 *Relations with customers and the Public Administration*

MPG Manifattura Plastica S.p.A. establishes that the Recipients must adopt behaviours aimed at satisfying the Customer's just requirements, with the aim of consolidating the relationship in compliance with the regulations in force.

MPG Manifattura Plastica S.p.A. also establishes that Recipients must refrain from disbursing or promising third parties sums of money or other benefits in any form or manner, even indirectly, to promote or favour the company's interests, even if subject to unlawful pressure, towards customers and the Public Administration.

They may not accept for themselves or for others such sums and/or benefits to promote or favour the third parties' interests in their relations with MPG Manifattura Plastica S.p.A. Gifts of significant value are not permitted; if they are of modest value, they must be attributable solely to acts of mutual courtesy in the context of proper business relations and as prescribed by internal regulations. Furthermore, they are forbidden to expose and spread untrue facts or to omit information or conceal data in direct or indirect violation of regulatory principles and internal procedural rules, so as to mislead any third-party recipient of such information. Any actions detected in contrast with the ethical and behavioural principles defined in this Code must be promptly reported to the Supervisory Board.

7.2 *Relations with Shareholders*

MPG Manifattura Plastica S.p.A. in its relations with its Shareholders undertakes to safeguard the company's assets by using criteria of sound and cautious management.

7.3 *Relations with Employees*

Employees must comply with the principles of protection and respect for the human person, loyalty, dignity, morality, fairness in personal relations, integration and cross-functional cooperation, sense of responsibility and respect for hierarchical and functional relations.

MPG Manifattura Plastica S.p.A. keeps employees constantly informed of corporate directives through the most appropriate information channels.

7.4 *Relations with Suppliers, Partners and Third Parties*

MPG Manifattura Plastica S.p.A. selects its Suppliers with particular attention, in compliance with the principles of transparency, impartiality and fairness, by ascertaining their actual technical and professional competence and the adequate means/tools to perform the commissioned activity.

Suppliers, Partners and Third Parties must know and comply with this Code. Contracts with Suppliers, Partners or other Third Parties must be made in writing. The contract must state the type of goods or services provided, the related costs, in line with market rules and fair competition, the principles of this Code as well as the corporate policies and procedures defined in this regard.

Among others, MPG Manifattura Plastica S.p.A. requires and verifies that its partners comply with their legal obligations regarding:

- Protection of child labour and women;
- Hygiene, health and safety conditions;
- Trade-union or other rights of association and representation.

In this perspective, MPG Manifattura Plastica S.p.A. could also provide - among contractual contents, in order to prevent the risks related to this type of offence - the performance of inspections at its suppliers' premises or request the suppliers themselves to submit all the useful documentation.

MPG Manifattura Plastica S.p.A. has decided to include express termination clauses in contracts with suppliers in the event of serious violations of the precepts of the Code.

7.5 *Relations with Associations, Trade Unions and Political Parties*

MPG Manifattura Plastica S.p.A. does not make direct or indirect contributions to finance political parties, movements, committees as well as political and Trade-Union organisations, nor their representatives or candidates.

Furthermore, the company does not finance associations or sponsor events or congresses that have political propaganda as their purpose.

MPG Manifattura Plastica S.p.A. may grant contributions and donations in favour of subjects with social, moral, scientific, sporting and cultural purposes. It verifies the respectability and correctness of the activities carried out by these persons.

8 **BEHAVIOURAL RULES pursuant to Lgs.D. 231/01**

Herein are the behavioural rules that are above all functional to the applicable regulations and consistent with the organisational model pursuant to Lgs.D. 231/01, of which this Code of Ethics forms an integral part, and they are subject to mandatory enforcement and observance by all the Recipients of this Code.

8.1 *Compliance with regulations*

On performing their respective activities, the Recipients shall comply with:

- a) The legislative and regulatory provisions applicable to the case;
- b) The provisions of the Articles of Association;
- c) This Code of Ethics and Behaviour;
- d) The general rules issued for the purposes of Lgs.D. 231/01;
- e) The communications and circulars of the Directorate,
- f) The resolutions of the internal operations committee where established;
- g) The service instructions and circulars issued by the competent organisational units and hierarchical superiors.

In particular, Recipients shall refrain from:

- a) Adopting a behaviour that may constitute the types of offence covered by Lgs.D. 231/01;
- b) Adopting a behaviour that may potentially become a type of offence if not constituting such a type of offence in itself.

8.2 Conduct with the Public Administration¹

MPG Manifattura Plastica S.p.A.'s conduct with the Public Administration is marked by full compliance with laws and rules.

MPG Manifattura Plastica S.p.A. establishes that it is forbidden for the Recipients to offer money or gifts to managers, officers or employees of the Public Administration or to their relatives, whether Italian or from other countries, unless they are gifts or benefits of modest value.

Illicit payments made directly, or through persons acting on behalf of or for the benefit of MPG Manifattura Plastica S.p.A., to Italian and foreign public bodies or their employees are considered acts of corruption.

It is forbidden to offer or accept any valuable object, service or favour to obtain a more favourable treatment in connection with any relation kept with the Public Administration.

In those countries where it is customary to offer gifts to customers or others, it is possible to do so when these gifts are of an appropriate nature and of modest value, but always in accordance with the law. However, this shall never be interpreted as seeking favours.

Anyone who receives explicit or implicit requests for benefits of any kind from the Public Administration, including through unlawful pressure, must inform the Supervisory Board. When any business negotiation, request or relationship with the Public Administration is in progress, the personnel in charge must not seek to improperly influence the counterparty's decisions, including those of officials dealing or making decisions on behalf of the Public Administration.

The aforementioned provisions do not apply to ordinary and reasonable entertainment expenses or gifts of modest value that correspond to normal customs, provided they do not violate legal provisions.

The Recipients must not unduly procure any other type of profit either for themselves, or for MPG Manifattura Plastica S.p.A., or for third parties, to the detriment of the Public Administration, by means of tricks or scams. Therefore, MPG Manifattura Plastica S.p.A. establishes that the Recipients shall not under any circumstances:

1. Have MPG Manifattura Plastica S.p.A. unduly obtain contributions, financing or other disbursements of the same type granted by the Public Administration by using or submitting false or misleading documents, or by omitting due information;
2. Use contributions, subsidies or financing intended for MPG Manifattura Plastica S.p.A., for purposes other than those for which they were granted.

The following actions must not be taken, directly or indirectly, in the course of a business negotiation, request or relationship with the Public Administration:

- Examine or propose employment and/or business opportunities that may benefit public administration employees in a personal capacity,
- Offer or any way provide gifts, unless of modest value or within the scope of applicable industry regulations;
- Solicit or obtain confidential information that may compromise the integrity or reputation of both parties².

In the specific case of carrying out a tender or in the phases of reporting to the Public Administration, one must operate in compliance with the law and in observance of the correct practices laid down by the Public Entity.

For all facts constituting an offence, the Recipients must promptly report to the competent internal functions (Supervisory Board and/or Senior Executives) and, in the most serious cases, inform the competent Judicial Authority.

8.3 Conduct with the Public Administration through third parties³

If MPG Manifattura Plastica S.p.A. uses a consultant or a third party for representation in relations with the Public Administration, the Company shall provide that the same directives valid also for the other Recipients are applied to the consultant and his/her staff or to the third party.

Moreover, MPG Manifattura Plastica S.p.A. shall not be represented, in relations with the Public Administration, by a consultant or a third party in the event that conflicts of interest may arise.

8.4 Conduct within the scope of health and safety at work⁴

MPG Manifattura Plastica S.p.A. refers to the following fundamental principles and criteria for all kinds of decisions and at every level, regarding health and safety at work:

¹ Taken from Confindustria - Guidelines for the creation of organisation, management and control models pursuant to Lgs.D. 231/2001

² Taken from Confindustria - Guidelines for the creation of organisation, management and control models pursuant to Lgs.D. 231/2001

³ Taken from Confindustria - Guidelines for the creation of organisation, management and control models pursuant to Lgs.D. 231/2001

⁴ Taken from Confindustria - Guidelines for the creation of organisation, management and control models pursuant to Lgs.D. 231/2001

- a. Avoid risks;
- b. Assess the risks that cannot be avoided;
- c. Combat the risks at source;
- d. Adapt work to man, in particular with regard to the design of workplaces and the choice of working equipment as well as working and production methods, in particular to mitigate monotonous and repetitive work and to reduce the effects of such work on health;
- e. Take into account the degree of technical evolution;
- f. Replace what is dangerous with what is not dangerous or is less dangerous;
- g. Plan prevention, aim at a coherent whole that integrates technology, working organisation, working conditions, social relations and the influence of factors in the working environment;
- h. Prioritise collective protection measures over individual protection measures;
- i. Give appropriate instructions to workers.

These principles of conduct are used by the enterprise to take the necessary measures for the protection of the workers' safety and health, including the prevention of occupational hazards, information and training, as well as the provision of the necessary organisation and means.

The entire company, at both top and operational levels, must adhere to these principles, particularly when decisions have to be taken or choices made and, subsequently, when they have to be implemented. (s. art. 6, subpara. 2, lett. b) of Lgs.D. no. 231/2001.

In particular, workers must:

- a. Contribute, together with the employer, managers and people in charge, to the fulfilment of the obligations laid down to protect health and safety at work;
- b. Observe the provisions and instructions issued by the employer, managers and people in charge for the purposes of collective and individual protection;
- c. Use working equipment, dangerous substances and preparations, means of transport and safety devices correctly;
- d. Make appropriate use of the protection devices made available to them;
- e. Immediately report to the employer, the manager or the person in charge any deficiencies in the means and devices referred to by letters c) and d), as well as any dangerous conditions of which they become aware by taking direct action, in case of urgency, within the scope of their competences and possibilities and without prejudice to the obligation referred to by letter f) to eliminate or reduce situations of serious and imminent danger, informing the workers' safety representative;
- f. Never remove or modify safety, warning or control devices without authorisation;
- g. Never carry out on their own initiative operations or manoeuvres that are not within their competence or that may compromise their own safety or that of other workers;
- h. Participate in education and training programmes organised by the employer;
- i. Undergo the health checks provided for by this legislative decree or otherwise ordered by the competent doctor⁵.

8.5 Conduct in using e-mails and the Internet

E-mail and Internet systems are made available by MPG Manifattura Plastica S.p.A. for purposes connected to the performance of the specific working activity, therefore, the same attention must be paid to the sending of e-mails as to other forms of written commercial communication.

The Internet connection or MPG Manifattura Plastica S.p.A.'s computers must not be used to consult, transmit or download contents that are not appropriate and not aimed at the working activity, with particular regard to the consultation of pornographic and child pornographic sites⁶.

It is also forbidden for the Recipients, in general, and in particular in the context of the professional relationship carried out with MPG Manifattura Plastica S.p.A., to use MPG Manifattura Plastica S.p.A.'s or third parties' IT tools to⁷:

- Penetrate the IT systems of the State, public bodies and, anyway, third parties illegally,
- Possess and disseminate access codes,
- Damage IT information, data and programmes,
- Interrupt operations and related communication activities,
- Produce public electronic document that are false or have probative value,
- Commit computer frauds of the electronic signature certifier.

Each of these forms of behaviour constitutes conduct liable to criminal prosecution.

⁵ Art.20, subpara. 2, of Lgs.D. no. 81/08.

⁶ Crimes against individual personality (art. 25-quinquies, Lgs.D. 231/01).

⁷ From art. 24 bis, Lgs.D. 231/01: 'Computer crimes and unlawful data processing'.

8.6 *Conduct within the scope of computer crimes*

Recipients and any other authorised collaborators, who use company-owned hardware and/or also access computer systems, networks, databases, services such as intranet, e-mail, etc., and other company-owned technological facilities with their hardware, are necessarily required to behave as follows:

- a. Carefully guard the work tool (personal computer, server, or other technological infrastructure) entrusted to them by the Company;
- b. Never abusively access computer and telematics systems protected by security measures;
- c. Never disclose or abusively communicate to anyone the codes, passwords or other means allowing access to a computer and telematics system protected by security measures;
- d. Never distribute or otherwise make available equipment, devices or computer programmes intended to damage/disrupt the operation of a computer/telematics system or the data/programmes contained therein;
- e. Never unlawfully intercept, impede or interrupt computer or telematics communications and never install equipment intended for that purpose;
- f. Never damage, alter or destroy information, data, programmes and computer/telematics systems.

8.7 *Conduct within the scope of copyright violations*

Recipients are necessarily required to behave as follows:

- a. Never modify the corporate configuration of the Personal Computer supplied and never use any software that is different or additional to that covered by the user licence or anyway within the scope of the relevant corporate standards;
- b. Absolutely refrain from making protected intellectual works available by placing them in telematics network systems;
- c. Refrain from abusively duplicating computer programmes or the contents of databases.

8.8 *Compliance with the model and conduct with the Supervisory Board*

MPG Manifattura Plastica S.p.A.'s Personnel and Recipients must conform their conduct, both in internal relations and towards external contact partners or third parties, to the regulations in force as well as to the principles expressed in this Code of Ethics and to the rules of conduct indicated, in compliance with the Model and the corporate procedures in force.

With particular reference to the Model, it is necessary to:

- a) Refrain from committing, causing or collaborating in the commission of a behaviour liable to constitute any of the offences referred to in Decree 231 (See Model - General part);
- b) Collaborate with the Supervisory Board (OdV) during the verification and supervision activities carried out by the latter by providing the information, data and news requested by it;
- c) Make the communications provided for in Chapter 12 of this Code to the OdV;
- d) Report to the OdV any malfunctions or violations of the Model and/or the Code of Ethics, in compliance with the provisions of the following paragraph "Notices to the Supervisory Board - Whistleblowing".

9 SUPERVISORY BOARD

As part of the activities to adapt its organisational model to the requirements expressed by Lgs.D. 231/01, MPG Manifattura Plastica S.p.A. has established a special Supervisory Board (hereinafter also referred to as OdV or Board). This Board has the function of verifying the proper operation of the organisational model and the compliance of employees with the rules contained in the Code by proposing any updates. This Board undertakes to report to the Board of Directors on its activities at regular intervals.

9.1 *Reports and requests for information to the Supervisory Board*

Personnel and Recipients may contact the Supervisory Board at any time, also for the purpose of requesting clarifications and/or information on, for example:

- The interpretation of the Code of Ethics and/or other protocols related to the Model;
- The legitimacy of a given concrete behaviour or conduct, as well as its appropriateness or conformity with the Model or the Code of Ethics.

9.2 *Notices to the Supervisory Board - Whistleblowing*

Information that may be related to violations of the Model or offences under Lgs.D. 231/2001 may be reported through the whistleblowing channels adopted by the Company in line with the "Whistleblowing Procedure" adopted by the Company in compliance with the provisions of Lgs.D. 24/2023.

In particular, such notices may be served as follows:

- in writing via an IT platform - accessible to the OdV only - and available at <https://www.mpgplast.it>, by filling in the Whistleblowing screen and specifying that you wish to benefit from the whistleblowing protections (by ticking the "confidential" option on the screen);
- Orally through voice messaging on the same IT platform;
- Orally through a direct meeting with the OdV, or its member.

The Company undertakes to protect the confidentiality of the identity of the whistleblower, of the persons involved in the report and of the content of the report itself, at all stages of handling the report.

Moreover, whistleblowers and other persons to whom the law extends whistleblower protection measures (e.g. facilitators) are safeguarded against any form of retaliation, discrimination, or penalisation on account of the report made. The sanctions provided for in the disciplinary system set out in this Model will be applicable to anyone who violates the measures to protect the whistleblower and other protected persons. The same sanctions may be applied in the event that the whistleblower is found to be criminally liable for the offences of slander or defamation or, in any event, for the same offences committed in connection with the complaint, or to be civilly liable for the same offence in the event of wilful misconduct or gross negligence, by virtue of a first-degree sentence, even if not a final one.

10 DISCIPLINARY SYSTEM

The provisions of this Code of Ethics form an integral part of the contractual obligations undertaken by the Recipients or by subjects having business relations with MPG Manifattura Plastica S.p.A.

Violation of the principles laid down in the Code and in the procedures set out by the internal protocols compromises the trust relationship between MPG Manifattura Plastica S.p.A. and its directors, employees, consultants, collaborators in any capacity, customers, suppliers, commercial and financial partners.

In cases where the conduct constitutes an offence and due to the consequent impairment of the trust relationship established with MPG Manifattura Plastica S.p.A., the Company is entitled to pursue disciplinary actions - regardless of whether criminal proceedings are instituted or not.

In the case of a subordinate employment relationship and with regard to the type of sanctions that can be imposed, the procedures provided for in art. 1 of the Workers' Statute and/or in special regulations, where applicable, are to be applied, which is characterised not only by the principle of typicality of violations, but also by the principle of typicality of sanctions⁸.

Disciplinary measures for violations of the Code are taken by hierarchical superiors, informing the Supervisory Board, in accordance with the laws in force and the relevant national or corporate labour contracts.

If, on the other hand, the breach of ethical rules should be committed by other parties (third parties) required to comply with this Code and, in any case, with the Model, by virtue of specific clauses included in the relevant contractual relationships, any failure to comply with the principles and rules contained in this Code entails the imposition of the sanctions of a warning, the application of a penalty (compensation for damages) or termination of the contract.

In this respect, MPG Manifattura Plastica S.p.A. provides for the insertion of clauses, including express termination clauses, in supply or collaboration, agency, partnership, procurement, etc. contracts that make explicit reference to compliance with the provisions of the Code.

11 APPROVAL AND DISCLOSURE OF THE CODE

This Code and any subsequent revisions and/or updates are subject to approval by MPG Manifattura Plastica S.p.A.'s Board of Directors. The Company undertakes to make this Code known to all Recipients pursuant to Lgs.D. 231/01.

⁸ Taken from Confindustria - Guidelines for the creation of organisation, management and control models pursuant to Lgs.D. 231/2001.

GLOSSARY

In this document:

Company	means MPG Manifattura Plastica S.p.A.
Senior Executives	mean the persons in charge of representing, administering or directing the body or one of its organisational units having financial and functional autonomy as well as the persons <i>de facto</i> managing and controlling the body itself
Subordinates	mean the persons subject to the direction or supervision of persons belonging to the top management.
Model	means the Organisation and Management Model in its entirety (General Part, Special Part, mapping of Risk Areas, mapping of Instrumental Processes, Code of Ethics).
Lgs.D. 231/01	means Lgs.D. no. 231 dated 8 June 2001 and its subsequent amendments and integrations
OdV-Board	means the Supervisory Board appointed by MPG Manifattura Plastica S.p.A. pursuant to Lgs.D. 231/01.
Recipients	mean the members of MPG Manifattura Plastica S.p.A.'s corporate bodies, the employees, whether they are "Senior Executives" or "Subordinates", the external collaborators, whether they are self-employed workers or legal entities and intended - in any capacity - to represent or operate on behalf of MPG Manifattura Plastica S.p.A. (see Chapter 5). The recipients must apply the rules laid down in this Code of Ethics in their professional conduct.