



# **ETHICAL CODE**

## **SA8000: 2014**

## **THE CODE OF ETHICS**

**“All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and must act towards one another in a spirit of brotherhood ”.**

**Art.1 Universal Declaration of Human Rights 10 December 1948**

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### **1 . FOREWORD**

The Code of Ethics has the purpose of defining with clarity and transparency the set of

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values that inspire us to achieve our growth objectives and the set of responsibilities that we assume towards all interested parties. This choice is essential to ensure the proper functioning, reliability and corporate reputation. In all the services provided, the company takes as its guiding principle the respect of all the reference laws and regulations, integrating the business with respect for partners and people. The company considers Honesty, Reliability, Impartiality, Loyalty, Correctness, Good Faith and Respect for mandatory requirements as indispensable factors for its success and also recognizes the importance of Ethical\_Social Responsibility in the conduct of its activities by committing to respect the interests of its stakeholders and the community with which it comes to interact. This Code of Ethics is primarily aimed at senior managers who legally represent the company with me. Finally, the company undertakes to ensure the maximum dissemination of the Code of Ethics and to provide adequate information tools in relation to the contents of the same, providing for it to be sent to all the strategic partners with which it collaborates. I therefore ask all employees and collaborators and all those who cooperate in carrying out our activities to commit themselves to observing and enforcing the principles listed in this Code of Ethics, each within the scope of their functions and responsibilities.

DUEGI PACKAGING S.R.L.  
*Paolo Pansella*

## **2. INTRODUCTION**

### **THE MISSION**

The company's mission is to guarantee the production of products and provide high quality and maximum safety services by applying a rigorous internal quality assurance system to processes and pursuing continuous improvement through research, development and constant control. The development of solid and long-lasting partnerships with suppliers also allows progressively to improve the added value of the resources used.

### **THE PHILOSOPHY**

The company has a great responsibility towards customers: to guarantee and improve the high quality and safety of its products and services. In order to verify the required quality standards, periodic internal audits are organized in the belief that customers must always be satisfied. The company wants to be synonymous with environmental and energy sustainability, quality and safety. A principle that also requires its suppliers who undertake to share it. Therefore the company is committed to a moderate use of natural resources and to a respectful management of the environment and man seen as a colleague, operator, end customer who uses our products.

## **3. SCOPE AND RELATED BREACHES**

The principles and contents of the Code of Ethics constitute obligations of diligence, loyalty, impartiality that qualify the correct fulfillment of the work performance and the behaviors in general that must be kept towards the company. Compliance with the Code of Ethics is an essential part of the contractual obligations provided for Employees, pursuant to and for the effects of the legal provisions applicable to the employment relationship, and for Collaborators, by virtue of the specific contractual clauses included in the relevant contracts. The violation of the rules of the Code of Ethics may constitute a breach of the primary obligations of the employment relationship pursuant to articles 2104 and 2105 of the civil code or disciplinary offense, with any consequence provided for by the law, by the CCNL applied and by the specific provisions of the sanctioning System and may result in immediate termination of the relationship for non-fulfillment and compensation for damages deriving from the aforementioned violation. Third parties who have relationships with the company and / or who collaborate or, in any

case, are involved in carrying out a Sensitive Activity and / or who act and operate to achieve the objectives, must commit themselves to respecting the Code of Ethics and its violation will constitute a serious contractual breach with any consequence provided by law and by the contract signed between the parties and may result in immediate termination, pursuant to art. 1456 of the Civil Code of the relationship for non-fulfillment of the counterparty, as well as the request for compensation for what has been suffered by the same and adequately documented.

## **4. PRINCIPLES AND REFERENCE STANDARDS**

### **4.1 LEGALITY**

The company undertakes to comply with Italian and international laws, internal provisions, including those of the Code of Ethics, as well as agreements, contracts and similar acts with third parties.

### **4.2 CORRECTNESS**

The company undertakes to act absolutely correctly both in external relations and within the organization, avoiding any behavior contrary to the principles of loyalty, honesty, moral integrity, responsibility, mutual respect and good faith.

### **4.3 TRANSPARENCY**

The company undertakes to guarantee, within the limits of its duties and competences, the correctness, completeness, uniformity and timeliness of the Administrative and Commercial information.

### **4.4 DILIGENCE**

The company undertakes to operate with maximum commitment and professionalism in carrying out the tasks and tasks assigned within the limits of its duties and competences.

### **4.5 CONFIDENTIALITY**

Any information, data or document known in the exercise of their work is confidential and cannot be disclosed in any way, except in accordance with corporate confidentiality

policies.

#### **4.6 EQUITY**

Each behavior will be inspired by values of objectivity and impartiality, avoiding any type of favoritism or discrimination.

#### **4.7. RESPONSIBILITY**

Each behavior must safeguard, as primary principles, the good repute, reputation and image of the company towards the interested parties.

#### **4.8 PROTECTION OF OWNERSHIP AND CREDITORS**

In pursuing corporate interests, there is a duty to refrain from carrying out activities and behaviors, even if only potentially harmful to the rights and interests of the property of and creditors.

#### **4.9 PROFESSIONAL ETHICS**

The tasks and duties entrusted are carried out with the highest degree of professional and moral responsibility. Respect for the aforementioned principles constitutes an essential element of work performance, translating into responsible behavior. None of the interested parties is authorized to pursue any objective in violation of the laws in force, in particular by using the company's means and assets. All employees and collaborators are required to dress professionally and in any case appropriate to the work done. As a rule, no employee can accept or promise and / or bestow, directly or indirectly by means of subjects connected to him, gifts, gifts or other forms of gifts for any reason in relation to his work or in any case to and from customers, suppliers and by any other third party with the intention of taking advantage of it for themselves and / or for the company. Exceptions to the above rule are gifts and gifts that have a modest market value according to objective criteria in relation to practices normally followed.

#### **4.10 CENTRALITY AND VALORISATION OF HUMAN RESOURCES**

Human resources are an essential element for the existence of the company and, therefore, the dedication and professionalism of its Employees and Collaborators are essential values and conditions for achieving the objectives. The company offers

everyone the same job opportunities and professional growth, ensuring every effort necessary so that everyone can enjoy fair treatment based on merit criteria, without discrimination based on sex, race, language, personal conditions. and social, on religious and political belief. The company undertakes to protect working conditions, safety in the workplace, the psycho-physical integrity of workers and their moral personality, placing all the conditions so that this does not undergo illegal conditioning. The company repudiates Mobbing understood as a form of violence against the person and is committed to developing the skills and competences of Employees and Collaborators so that the energy and creativity of individuals find full expression for the realization of their potential. To this end, it identifies professional training as the fundamental tool for improving the professionalism of Employees and Collaborators. All Employees and Collaborators have the right to a correct, courteous and respectful treatment. The company therefore expects that Employees and Collaborators, at all levels, collaborate to maintain a climate of mutual respect for the dignity, reputation and honor of each and will intervene, to prevent abusive or defamatory interpersonal attitudes. The top management will endeavor to create working groups if necessary to promote the achievement of growth objectives with the development of the person so that company and personal growth coincide.

#### **4.11 CONFIDENTIAL INFORMATION AND PRIVACY PROTECTION**

The activities require the acquisition, storage, processing, communication and dissemination of documents and other data. The company undertakes to ensure the correct application and correct treatment of all information used in carrying out its business. Any information and any other material in any way obtained is owned by the company and must be considered confidential. This information may relate to present and future activities, including not yet disseminated news, information and announcements even if soon to be disclosed. The databases may also contain personal data protected by privacy legislation and by the provisions relating to professional secrecy, data that cannot be disclosed externally and data whose inappropriate or untimely or unauthorized disclosure could produce damage to corporate interests. The company undertakes to protect the information relating to its Employees and Collaborators, to third parties generated or acquired internally and in business relationships, and to avoid any improper use of this information.

#### **4.12 CONFLICT OF INTEREST AND FREE COMPETITION**

The company works to avoid situations where the subjects involved in the transactions are, or may appear, in conflict with interests. In relations between the company and third parties, ethical and legal behavior must be adopted, all relations must be managed without resorting to illegal means. Corruption practices, illegitimate favors, collusive behavior, solicitations to obtain personal advantages for oneself or for others are expressly prohibited, even if these guarantee advantages for the company.

#### **4.13 HYGIENE, SAFETY AND THE ENVIRONMENT**

The man and the environment in which it operates are of priority interest. Operational management is based on criteria of environmental protection and efficiency, pursuing the improvement of health and safety conditions at work at all levels. The company takes care of the safety and health of its Employees and Collaborators as well as all those present in the workplace and is also liable for all the actions or omissions of its Employees and Collaborators and, therefore, for any damage caused to other Employees and / or Collaborators and / or third parties. Therefore, strict compliance by all interested parties with the provisions on safety and health for collective and individual protection is necessary. They must correctly use the equipment, means of transport and other work equipment as well as safety devices. They must report the deficiencies of the means, devices and equipment as well as any other dangerous conditions they become aware of, working in an emergency, within the scope of their competences and possibilities, to eliminate or reduce these deficiencies or dangers. All workers do not remove or modify without the written authorization of the persons in possession of the necessary powers, the safety or signaling or control devices and do not carry out, on their own initiative, operations or maneuvers that are not within their competence or that may compromise the safety of oneself or of other Employees or Collaborators. The collaborators and employees undertake to undergo the necessary medical examinations as well as all the training and training activities that may be necessary for both the mandatory and voluntary regulations that the company should pursue.

#### **4.14. INFORMATIC SYSTEMS**

Given that the use of IT resources must always be based on the principles of diligence and correctness - Employees and Collaborators are in any case required to adopt



additional internal rules of common behavior aimed at avoiding inappropriate and / or incorrect conduct that may cause damage in compliance with the provisions and / or indications provided by the competent functions in compliance with the privacy legislation and the provisions relating to professional secrecy. The personal computer and mobile communication systems and the related programs and / or applications entrusted to the Employee are work tools and, therefore, must be kept in an adequate manner with respect for the instructions given in application of the provisions of the privacy legislation as well as by the internal regulations for the protection and defense of corporate assets, and with a commitment to promptly report the theft, damage or loss of these tools to one's direct supervisor. The company will verify, within the limits allowed by the legal and contractual rules, compliance with the rules and the integrity of its IT system, making use, if deemed necessary, of specialists in the sector.

In particular to Employees and Collaborators:

- a) it is not allowed to browse sites that are not relevant to the performance of the assigned tasks;
- b) the participation, for non-professional reasons, in "forums", the use of chat lines, bulletin boards and guest book registrations, also using pseudonyms (or nicknames), is not allowed;
- c) the storage of any computer document considered personal pursuant to EU Regulation / 2016/679 is not allowed.
- d) browsing on sites considered outrageous and / or discriminatory by sex, language, religion, race is strictly prohibited.
- e) connect to or in any case access sites the contents of which can lead to offenses against the person (e.g. child prostitution, child pornography and related crimes, etc.).

In specifying that e-mail is also a work tool and that personal use is not allowed and in particular:

- a) it is not allowed to send or store messages of an outrageous and / or discriminatory nature by sex, language, religion, race, ethnic origin, opinion and union and / or political affiliation;
- b) any communication sent or received must take place in compliance with company procedures;

c) the use of the company email address for participation in debates, forums or mailing lists is not permitted, unless otherwise and explicitly authorized.

#### **4.15 TRANSPARENCY ON ACCOUNTING**

For each activity, the company must make it possible to verify the decision-making, authorization and execution process, being provided with adequate document support. Consequently, the accounting records must be kept, by the respective Managers, in accordance with the law, internal procedures and the principles of transparency, clarity and completeness with the aim of guaranteeing a correct and truthful representation of the equity and financial situation and management activity. All those involved are required to collaborate so that the overall management is correct, timely and transparent in accounting. It should be noted that compliance with the aforementioned principles relating to the keeping of accounting records does not only concern the work of the Employees or Collaborators belonging to the administrative offices but applies to each Employee or Collaborator, in any area he operates. For each operation, adequate supporting documentation of the activity is kept in the records in order to allow easy accounting recording, identification of the different levels of responsibility, accurate reconstruction of the operation, also to reduce the probability of errors interpretation. Each record must reflect exactly what appears from the supporting documentation. It is the duty of each Employee or Collaborator to ensure that the documentation is easily traceable and ordered according to the procedures. Employees and Collaborators who become aware of omissions, falsifications, negligence in the accounting or in the documentation on which the accounting records are based, are required to report the facts according to the procedures set out in the disciplinary of conduct.

### **5. RELATIONS WITH STAKEHOLDERS**

#### **5.1 CUSTOMERS**

The company pursues the goal of satisfying its customers by providing high quality products and services at competitive conditions and prices on the market in full

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compliance with the rules and regulations in force. The objective pursued is to guarantee an immediate and qualified response to the customer's needs by standardizing their behavior with principles of fairness, courtesy and collaboration. Therefore company representatives must not promise or offer payments or goods to promote or favor personal interests.

## **5.2 SUPPLIERS**

The company has the objective of obtaining high quality standard products, equipment and services, at the most advantageous conditions in terms of quality, service and price. The selection of suppliers is strategic and carried out on the basis of an objective and transparent evaluation proven by specific documentation aimed at ascertaining the reliability, integrity and professionalism of the suppliers. All suppliers with whom the company comes to work ensure operating methods compatible with respect for human, worker and environmental rights. Company representatives cannot receive any form of consideration from anyone for the performance of an act of their office or contrary to duties and cannot be subjected to any form of conditioning by third parties. All those involved in the procurement activity and who have direct or indirect relationships with suppliers must declare these links to the management that will decide how to continue the activity. Employees and Collaborators must therefore observe all internal rules and procedures as well as the most scrupulous efficiency and courtesy in managing relations with suppliers. They must also follow the truth and clarity in communications and provide comprehensive information. In the management of procurement contracts and, in general, of the supply of goods and services, the parties involved must operate with the diligence required by the nature of the goods and services provided. For this purpose, in compliance with their functions, the aforementioned subjects take care of:

- observe the internal principles and procedures for selecting and managing relations with third parties;
- do not preclude any supplier who meets the required requirements from competing to win a supply by adopting objective criteria of fairness and transparency in the selection;
- select only qualified people and companies based on business needs, with the aim of obtaining the best possible conditions in terms of quality and costs of the products offered;
- adequately assessing any indication of objective and verifiable provenance regarding

the appropriateness of using certain external subjects;

- request the maximum collaboration of suppliers to ensure the satisfaction of internal needs and its customers in terms of quality, cost and delivery times, to an extent equal to their expectations;
- promptly report any doubts regarding possible violations of the Code of Ethics by third parties.

Third parties who have relationships with the company and / or who act for any reason on its behalf have a clear obligation to know and comply with the Code of Ethics. The obligation of third parties to comply with the principles of the Code must be reflected in a specific contractual clause.

### **5.3 PUBLIC ADMINISTRATION AND PUBLIC INSTITUTIONS**

All relations between the company and the Public Administration are managed by the collaborators appointed for the purpose and are based on the principles of legality, correctness, transparency, collaboration and non-interference, in compliance with their mutual roles and applicable regulations. Those in charge must refrain from influencing the decisions of the representatives of the Public Administration: the company does not allow to pay money, or other means of payment, directly or through intermediaries to public officials in order to influence their activity in carrying out the own office duties. Gifts, favors, benefits or behavior that are not based on transparency towards public official representatives and public employees are not allowed. It is forbidden to carry out any act aimed at unduly receiving subsidies, contributions or public funding. It is forbidden to use the financial resources lawfully obtained by the Public Administration for purposes other than that for which they were requested and obtained. Any request or proposal for benefits from public officials must be reported.

### **5.4 POLITICAL AND TRADE UNION ORGANIZATIONS**

The company does not support or promote events or initiatives that have an exclusively or mainly political purpose, even if with a social background. Company representatives must recognize that any form of involvement in political activities takes place on a personal basis, in their free time, at their own expense and in compliance with the laws in force. The company recognizes the union as an interlocutor, without however precluding the possibility of listening to the social partners even in its absence.

## **6 EXTERNAL EFFECTIVENESS**

### **6.1 PRESS AND EXTERNAL COMMUNICATIONS**

The relations between the company and the mass media are pertinent to the corporate functions in charge and must be carried out in accordance with the defined communication policy. The company, recognizing the fundamental information role played by the media towards customers, undertakes to collaborate with all the information bodies, without discrimination, in compliance with their reciprocal roles and commercial needs, in order to respond promptly, completely and transparently to their information needs.

### **6.2 SOCIAL COMMITMENT**

The company recognizes its moral responsibility in contributing to the continuous improvement of the community in which it operates, through the promotion of cultural and sporting initiatives, paying particular attention to young people, the elderly and all those who live in a difficult situation. It also recognizes its responsibility towards the families of its collaborators and sees the commitment to the future of these in the commitment to improve the company.

### **FINAL NOTES**

This Code of Ethics was approved by the Management on 03/24/2020. It represents the values in which the company recognizes itself and which are applied in the exercise of its activities. Any employee and collaborator who violates the Code of Ethics may be subject to disciplinary action, the revocation of powers or functions, the referral to the competent administrative or judicial authorities. Any changes and / or additions must be approved by the Management. In addition to being distributed to all employees, this Code of Ethics must be handed over to all new employees and become an integral part of the whole company's way of thinking.