



# CODE OF CONDUCT

## Annex to the Model of organization, management, control and regulation adopted pursuant to the Italian Legislative Decree no. 231/01 by Brandart

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## CODE OF CONDUCT

### INTRODUCTION

BRANDART IMAGE PACKAGING SRL (hereinafter referred to as the Company or BRANDART) has been committed for a long time, through the adoption of appropriate preventative measures and checking mechanisms, to the complete compliance of all applicable laws and regulations wherever it operates and at all decision-making and operational levels, as the Company believes ethics, integrity, transparency and commitment form the foundations of a successful company. All the employees and workers must be committed to the achievement of these objectives when carrying out their role in their area of responsibility.

Observance of this Code of Conduct (or “Code”), by the Company’s employees, collaborators, consultants and general contractors is of fundamental importance, to which the integrity and reputation of the Company is linked, which are in turn factors that are crucial for success of the company.

### 1 BRANDART’S CODE OF CONDUCT

This document, called the “Code Of Conduct”, has been approved by the Governing Body of the Company. It sets out all the rights, duties and responsibilities taken on by BRANDART when carrying out its activities, in respect of any stakeholder who has a direct or indirect relationship with the company and who can influence its activities or is subject to the outcome of its activities (so-called Stakeholders).

As the actions detailed are one of the cornerstones of the internal audit system, this document is be considered an integral part of the Organization’s Management System adopted pursuant to Italian Legislative Decree no. 231/01 (Model 231).

BRANDART’s policy has always been to carry out its business activities with honesty and integrity, strictly adhering to principles of honesty, loyalty and propriety.

The Code identifies and defines, not only the responsibilities of all those subject to the Code, but the general standards of behaviour that the entire Company must abide by, such as, more specifically:

- legality
- fairness and equality
- professional correctness and integrity
- transparency and diligence
- impartiality
- fair competition
- prevention of conflicts of interest
- confidentiality
- protection of the individual
- protection of health and welfare in the workplace
- protection of the environment
- innovation and research

The CODE will be updated and possibly amended, following proposals from the Supervisory Body (so-called SB) and/or from any corporate body, whether due to changes in legislation or operational experience, or due to possible changes in the organization and/or activity of the Company.

Updates and any amendments to the CODE, following approval by the administration, are circulated or in any case made known to its recipients as detailed below.



## CODE OF CONDUCT

### 1.1 Scope and recipients

This Code of Conduct is addressed to all corporate bodies and their members, management, employees, independent contractors, consultants and collaborators of all kinds, agents, representatives, and any other individual who can act for and on behalf of BRANDART and, in general, anyone with whom BRANDART has contact with during their activity (hereinafter the “Recipients”).

BRANDART considers the compliance with applicable laws and regulations of any country where it operates and fairness and transparency in managing business to be principles that must be upheld.

Therefore, BRANDART promotes the creation of an environment characterized by a deep sense of ethical integrity, certain that this is also crucial for the effectiveness of its policies and management systems.

Specifically, the directors of the company must be guided by the principles of the Code of Conduct when they agree corporate objectives, propose investments and implement projects, and in any management decision or action.

Similarly, directors and supervisors of corporate activities must be guided by the same principles, when carrying out internal activities thus strengthening the cohesion and spirit of mutual cooperation, and with third parties, and there is an explicit prohibition to resort to unlawful favouritism, collusive practices, corruption and/or solicitation of personal advantages for oneself or third parties.

Recipients therefore must actively contribute to the implementation of the Code of Conduct and they must report any problems or issues to the Supervisory Body of BRANDART.

### 1.2 Significance of the Code

Compliance with principles and rules of the Code, their continual promotion and application within responsibilities assigned is an essential and integral part of the contractual obligations of each Recipient and its violation could result in – where appropriate – disciplinary action and/or liability for compensation.

Thus, a violation of the rules of this Code can constitute a serious non-fulfilment of the obligations that are inherent in the contract of employment, and be a source of tort, with a related personal liability.

### 1.3 Knowledge of the Code

BRANDART is committed to ensuring the maximum diffusion of this Code of Conduct by using all available means of information and by implementing procedures to ensure awareness of its contents.

## 2 ETHICAL PRINCIPLES

BRANDART adheres to following ethical principles (hereinafter also the “Principles”), to achieve its objectives, and to be a model for all with whom it comes into contact:

- observance of applicable legislative and regulatory provisions of all the countries where BRANDART operates;
- legitimacy, loyalty, fairness, transparency;
- confidentiality;
- respect of the individual and personnel;
- respect of competition, as an essential tool for the development of economic systems;
- respect of the environment and awareness of the protection of the environment.



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### 2.1 Implementation of the ethical principles: Recipients' obligations

Directors, statutory auditors, managers, and supervisors of BRANDART must adhere to this Code of Conduct and implement the values such as loyalty, probity, honesty and good faith, correctness, integrity when carrying out activities. They must refrain from any activity that could be deemed, even potentially, to be in conflict with the interests of BRANDART by promptly providing information to the Supervisory Body which will evaluate whether a personal interest may arise from undertaking the company's business.

The work of employees and collaborators carried out with professional rigour, loyalty, honesty, in good faith, with correctness, commitment and spirit of mutual co-operation contributes to the achievement of the aims of the business.

The criteria of cooperation, loyalty and mutual respect must shape the relationships between employees at all levels, both between them and with third parties, with whom their work may bring them in contact with.

Any action, operation, negotiation and, in general any activity carried out by employees and collaborators must comply with the rules of transparency, completeness and truthfulness of information, as well as corporate procedures.

Specifically, employees and collaborators must:

- be aware of and adhere to the internal procedures on leave, holidays, reimbursement of expenses – and for expenses provide appropriate documentation;
- be aware of and carry out any corporate requirements on safety and disclosure of information concerning BRANDART and its competitors;
- use corporate equipment with diligence and only for purposes connected to the performance of tasks assigned;
- use computer systems in an appropriate manner, it is absolutely prohibited to manipulate the data stored in computer systems;
- not use the name and reputation of BRANDART for personal purposes;
- diligently comply with the provisions of this Code of Conduct, avoiding any behaviour contrary to it;
- collaborate in eventual assessments of possible and/or presumed violations of this Code of Conduct;
- inform third parties entering into relation with the company about the prescriptions of the Code of Conduct and request them to comply with the Code.

Any improper or inappropriate use of corporate equipment is not tolerated, specifically electronic equipment and or computers, such as, by way of an example:

- unauthorized access to the corporate computer system and/or third parties' computer systems;
- any infringement of industrial and/or intellectual property rights of the company and/or any third party;
- access, creation, display, transmission or any use of any damaging, threatening, illegal, abusive, defamatory and/or slanderous, vulgar, obscene, prejudicial to third parties' privacy, racist, xenophobic, class-based or anyway reprehensible content;
- any intent to undertake the sexual or violent exploitation of persons, including publication of pornographic or pedopornographic pictures, offers of prostitution or other invitation of a sexual content as well as links to adult websites;



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- propaganda, including political and trade union issues, and/or use of symbols considered unlawful by the Italian laws and/or of the Country of the User;
- actions promoting or implement criminal activities such as pedophilia, fraud, cybercrime, unlawful drugs trafficking, stalking, gambling, money laundering, theft and unlawful trade, including business/industrial secrets, etc.;
- inflicting virus, malware, Trojan or any other code, file or software created to interrupt, destroy or limit the functioning of software, hardware or telecommunication systems of the Company and/or third parties;
- damaging, in any form, the reputation of the Company and/or any third party;
- transmission of confidential corporate information in the absence of appropriate authorization.

### 2.2 The importance of the individual and personnel

BRANDART promotes individual rights through the respect of the physical, cultural and moral integrity, by protecting its employees and collaborators against discriminations based on nationality, race, ethnicity, religious belief, political and trade union membership, language, age, sex and sexuality. In this sense, Recipients must actively cooperate to maintain a climate of mutual respect of the dignity and skills of everyone.

BRANDART considers its employees and collaborators as valuable and essential resources for its business and its future development. It deems it essential to ensure uniformity and consistency of management in all the businesses and countries where the Company operates, with due regard for local culture and laws.

BRANDART pursues excellence and values a spirit of innovation, while respecting each and everyone's limits of responsibility and, at the same time, promotes the participation of people in the company's development. Management and employees are encouraged to assume responsibilities and to work to overcome challenges and achieve corporate objectives. The entrepreneurial culture of the Company recognizes, promotes and rewards the proactive individual and team work.

To appraise the skills and expertise of its employees, BRANDART adopts standards of merit and guarantees gender equality without any discrimination, in fact:

- selection and assessment of personnel is carried out according to objective criteria based on evaluation of the professional profile and skills of candidates with respect to the company's requirements and in compliance with equality opportunity for candidates;
- information obtained during the selection process is strictly connected to the assessment of the professional profile needed, with due regard for the privacy of the candidate and his/her personal opinions;
- personnel are employed in compliance with the type of contract envisaged by the applicable legislation and where possible using nationally agreed contracts;
- the attribution of assignments is decided by considering the skills and abilities of each person, according to the company's requirements and the professional development of its employees;
- management, training and development policies are intended to support employees to follow their path of professional growth and constantly update their managerial and technical expertise to allow them to perform their role in the best way possible and to achieve business objectives;
- the remuneration system is defined according to the role of employee and the skills and expertise that it requires, as well as results achieved, and continuous and systematic comparison with the appropriate external labour market;
- the collection of information and the collection and production of documents during the selection and management process, as well as their storage in paper or computer format, occurs in full compliance with the applicable privacy law of various countries.



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BRANDART guarantees that working conditions respect the dignity of the individual and it censures any behaviours that may molest or discriminate, including regarding beliefs and preferences, and it explicitly condemns any form of psychological, physical and sexual molestation.

BRANDART is committed to ensuring a culture of safety and health and safety for the workers in the workplace, by promoting the awareness of risks and ensuring accountability for everyone's behaviour.

BRANDART acts towards its employees and collaborators in full compliance with the provisions of the Italian legislation on health and safety at work as referred to in the Italian Legislative Decree no. 81 of 9<sup>th</sup> April 2008, as amended and integrated, or the applicable local legislations in various countries.

### 2.3 Employees and Collaborators

#### 2.3.1 Recruitment policies

Honesty, loyalty, skills, professionalism, reliability, technical background and personal commitment are crucial requisites to ensure the achievement of the Company's objectives and they are the characteristics required of employees and all collaborators.

So as to contribute to the development of the business objectives and ensure that said objectives are pursued by all in compliance with the ethical principles and values which guide the Company, corporate policy is intended to select each employee and the various collaborators according to values and characteristics described above. When recruiting personnel – undertaken in compliance with gender equality and without any discrimination regarding the private life and opinions of candidates – the Company works so that the those hired have personal profiles that correspond to actual business requirements, thus avoiding any form of favouritism and preferential treatment.

Staff are employed on a standard work contract. No form of irregular labour is tolerated. At the start of employment, the new member of staff receives the Code of Conduct along with information concerning the nature of the activity to be undertaken, procedures to be adopted, standards and rules to abide by to ensure development of a productive working relationship.

#### 2.3.2 Non-discrimination principle

The Company deems it essential to respect the fundamental rights of individuals by protecting their moral integrity, avoiding any form of discrimination and, specifically discrimination based on race, sex, age, nationality, religion and beliefs: the assessment and recognition of results achieved, professional potentialities and skills expressed by the individuals represent essential criteria for career advancement and salary increases.

#### 2.3.3 Working conditions

The Company is committed to be compliant with all labour laws and regulations and collective agreements in place, in particular as regards working hours, wages, social security contributions and health and safety in the workplace.



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### 2.3.4 Fight against exploitation

The Company does not employ any form of forced labour or anyone underage as defined by the labour legislation of the country where the work is undertaken. The Company is also committed to not establish or maintain any business relationship with suppliers making use of child labour, as defined above.

The Company does not employ foreign workers whose presence in Italy is irregular. Specifically, the company does not employ workers who do not have a residence permit, or have an expired, suspended or cancelled residence permit.

### 2.3.5 Conduct in the workplace

To the greatest extent possible, the Recipients of the Code of Conduct, must strictly comply with applicable laws, regulations and corporate directives, as well as strive to maintain a respectable work environment, where everyone's dignity is respected.

Specifically, they:

- must not work under the effect of alcohol or narcotic drugs;
- must avoid behaviour that could be threatening or offensive for colleagues or subordinates;
- must create and promote a respectful and friendly environment for colleagues or subordinates;
- must respect the prohibition of smoking on corporate premises as set out by section 51 of Italian law no. 3 of 16<sup>th</sup> January 2003, in compliance with the signs put up by the Company.

Furthermore, sexual harassment or any attitude or behaviour that could molest an individual will not be tolerated in any way; BRANDART does not tolerate any form of discrimination based on age, sex, racial or ethnic origins, religion, political and trade union opinions, physical conditions, nationality, marital status or sexual orientation.

### 2.3.6 Work environment and safety

It is an objective of the Company to maintain a working environment free of hazards for health and safety and where the operational risks are within admissible levels, in compliance with the (general) rule referred to in section 2087 of the Italian Civil Code and applicable (specific) legislation prescribed (mainly) by Italian Legislative Decree no. 81/2008 (as amended).

For this reason, the Company manages its activities by enhancing the protection of the environment and safety of personnel and third parties, pursuing as objective the continuous improvement of the working environment and committing to:

- completely respect the current applicable provisions regarding the protection of health and safety in the workplace;
- adopt the measures that, considering its business activity, experience and processes, are necessary to protect the physical integrity and moral wellbeing of its workers;
- promote the participation of Recipients and especially suppliers, as far they are concerned in carrying out their roles, in the processes concerned with risk prevention, environmental protection, and protection of health and safety in the workplace.



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### 2.4 Confidentiality

BRANDART, in compliance with the Italian Legislative Decree 196/2003 “Code for the Protection of personal data” and local laws for foreign companies, protects personal data processed to avoid improper or even unlawful use and consequently has adopted specific procedures to ensure:

- appropriate disclosure to the persons concerned;
- where necessary acquisition of the consent of the persons concerned.

The Company adopts minimum and suitable security measures to reduce, as far as possible and based on techniques available, the risk of unauthorized communication/diffusion of data, of unauthorized access or of unauthorized processing of data for which it is the Data Controller.

All the Recipients, in the exercise of their functions and within their area of responsibility, must implement said safety measures, both in terms of data in computers, and in paper files and archives.

The Recipients of the Code must not use, communicate or disclose, any corporate information regardless of how the information has been acquired, to be considered henceforth unconditionally confidential, unless in compliance with the legal and/or contractual provisions, nor any trade or industrial secrets, namely any corporate information/documents that are objectively confidential or even just referred to as such by the Company and acquired in virtue of, or during, a working relationship.

### 2.5 Correctness and transparency of accounting practices and internal audits

BRANDART, in its accountancy practices, complies strictly with applicable legislation, and regulatory standards, concerning the preparation of financial statements and in general to mandatory administrative-accounting documentation requirements.

Accounts, company information and data given to third parties is provided according to criteria of transparency, correctness, accuracy and completeness.

Any action, operation or transaction must be correctly registered in the corporate accounting system according to criteria indicated by the law and applicable accounting standards and, furthermore, be duly authorized, verified, legitimate, consistent and congruous in compliance with internal procedures.

The Recipients must give their full cooperation so that management-related issues are correctly and promptly recorded in the corporate accounts and they must keep all the suitable supporting documentation and make it readily available and consultable by those appointed to check it.

BRANDART requires and promotes full compliance with internal audit procedures, as a tool for the improvement of corporate efficiency.

The internal audit system consists of checks on the activities that each corporate body undertakes and their processes, so that to protect corporate assets, effectively manage the company’s business and provide clear information on the economic and financial standing of BRANDART, as well as activities to identify and reduce corporate risks.



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Recipients must, as far as they are concerned, cooperate actively to ensure the correct and effective functioning of the internal audit system.

The designated audit personnel are guaranteed free access to data, documentation and any useful information to carry out audits.

### 3 RELATIONSHIPS WITH THIRD PARTIES

BRANDART is particularly scrupulous in developing a trusting relationship with any potential interlocutor.

In the performance of its activities, BRANDART implements the principles of loyalty and fairness, and it asks of everyone operating on its behalf honest and transparent behaviours in compliance with the law, and it does not tolerate corruption and/or collusive behaviour, or undue favouritism.

Employees and collaborators are forbidden, while performing any activity connected to BRANDART, to give/offer and/or accept/receive free gifts, any advantage and/or any other benefit, regardless of whether it is or is not of a personal nature, except for small gifts that can be defined as normal courtesy in relationships or business practices.

#### 3.1 Relationships with customers

The Company pursues the objective to meet the highest and legitimate expectations of its Customers, by always treating them fairly and honestly, supplying them with quality products in compliance with rules for the protection of competition and trade.

Hence the Company requires of the Recipients of the Code, to the maximum extent possible in all relations and contacts with Customers to implement the principles of honesty, fairness, impartiality, professionalism and transparency.

The Company in its relationships with the Customers must:

- apply the internal procedures for the management of relationships with Customers in order to achieve the objective of developing and maintaining favourable and long-lasting relationships with Customers;
- operate within the scope of applicable legislation;
- always respect commitments and obligations undertaken for Customers.

#### 3.2 Relationships with suppliers and external consultants

The selection of Suppliers must be exclusively targeted at those that provide appropriate guarantees of transparency, fairness, reliability and have the technical capability to be able to undertake the required service.

In the choice of external suppliers and consultants, as well as in the determination of the conditions of purchase of goods and services, and in the assignment of professional appointments, Recipients must try to obtain the greatest competitive advantage for the Company, by selecting the supplier or consultant able to provide goods and services of the quality requested under the most appropriate terms and conditions.



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The agreement of a contract with a supplier must be always based on relationships of utmost clarity, avoiding wherever possible, the acceptance of contractual restrictions that entail any type of dependence on the supplier or on a company of the Group involved.

Remunerations and amounts paid on whatever basis to suppliers and consultants for supplies and professional appointments must be in line with the market conditions and properly documented.

The choice of external consultants must favour persons who, for their proven reliability and professional background, are able to carry out, in the best manner possible, the services required. Working relationships with consultants must be characterised by conditions that ensure complete transparency.

The company must be allowed to verify at any time which services have been provided and if the consultant is fulfilling his/her contractual obligations. The consultant in turn must regularly inform BRANDART about the activities being undertaken.

The payment of the services of the consultant must be carried out based on a detailed presentation of the activities performed by the latter, to allow inspection of the effectiveness and adequacy of the remuneration with respect to the value of the services provided.

The suppliers of goods and services who intend to work with BRANDART must accept this Code without any reserve or conditions, as well as principles set out in the conventions of the International Organization of Labour, in the Universal Declaration of Human Rights, in OECD guidelines and in the Global Compact principles.

Specifically, the suppliers of goods and services to BRANDART, with specific reference to the issues of safety at work, protection of dignity and health of employees, commit to comply with the principles described below, and ensure that the corresponding ethical, social and legal values are guaranteed and protected:

**Forced labour:** our suppliers must repudiate, and severely forbid, any forced labour obtained under the threat of punishment, or seizure of identity documents, or any other restriction;

**Child labour:** our suppliers must not use employees under the age of 16, and in countries where the local legislation sets an age above 16 years for child labour or imposes the compulsory education for those over 16, they must be compliant with said restriction;

**Abuse and harassment:** our suppliers guarantee that their employees are treated with respect and dignity and that under no circumstance any type of corporal punishment, psychological or physical harassment or any other type of abuse is tolerated.

**Discrimination:** our suppliers guarantee that all the employees are treated equally, and no discrimination is carried out and/or tolerated in recruitment, access to training, promotion, or dismissal based on sex, race, religion, age, disability, sexual orientation, political opinions, nationality or social or ethnic origin;

**Wage and benefits:** Our suppliers must guarantee the minimum wage and payment of overtime, as imposed by the applicable legislation. In case the legislation of the Country of origin does not set out a minimum wage or does not envisage the payment of overtime, the supplier must guarantee that wages are at least equal to the minimum average of the relevant industrial sector and that the payment of overtime is at least equal to the reference average rate of the same sector. Withholdings wages must not be made for disciplinary reasons.



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**Working hours:** In relation to working hours and overtime, our suppliers must comply with limits set out by the laws of their country. Our suppliers cannot impose excessive overtime. The total number of hours worked per week cannot exceed 60 hours, including overtime, and at least one day off in a period of seven days must be guaranteed or, in both cases, the applicable laws of the home Country must be adhered to.

**Freedom of Association:** our suppliers commit to respect and recognize the right of any worker to join a trade union organization of their choice without the imposition of any penalty, discrimination or harassment.

**Health and safety:** Based on specific risks present in the industrial sector, our suppliers guarantee a healthy and safe work environment, to avoid accidents or physical injuries that can be associated with the type of work and the use of specific equipment. Our suppliers must implement systems to identify, avoid or eliminate any dangers to the health and safety of its employees and comply with currently applicable regulations or local and international laws. The same principles must apply to suppliers offering housing to employees.

Suppliers of goods and services of BRANDART, with specific reference to the environmental protection, commit to accept and respect local and international regulations and Standards.

Furthermore, the suppliers of the company must be able to prove the actual implementation of the following requirements:

- compliance with environmental legislation, where possible the existence of an environmental management system;
- management of waste, paying attention to hazardous waste and emissions or disposals that could be managed in ways not compliant with the applicable legislation.

Furthermore, the suppliers must guarantee that their employees, whose work has a direct effect on the environment, must be trained and equipped with the necessary equipment for the correct performance of their work.

The suppliers of the company must also guarantee to:

- adhere to all the national, local and international laws in connection with the management of their activities.
- adhere to applicable customs laws, including those concerning imports and prohibition of transfer of goods in the import country.
- not subcontract any part of the production process without the express consent of BRANDART.

BRANDART reserves the right to verify the adherence to said principles and to carry out inspections and compliance reviews, at any time, including without notice. Our suppliers must provide the representatives of the company, who have the task to verify the observance of the prescriptions of this Code, with the necessary information and access.

All suppliers, at the time of contract signature, will receive an extract of this Code of Conduct (annex 1 or annex 2 depending on whether they have an office in Italy or abroad), which has a detailed explanation of the commitments and obligations to be undertaken; the supplier must expressly accept BRANDART's Code of Conduct and anything contained in the annex received, by means of a clear and unambiguous signature, following the instructions given in the annex.



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### 3.3 Relationships with the Public Administration

The relationships with the public administration are exclusively those:

- (i) instrumental to the attainment of authorizations necessary for the performance of the business activity,
- (ii) intended to assess the implications of laws and regulations with respect to business activities,
- (iii) necessary to meet requests made of BRANDART by the public administration, in the performance of its institutional activity.

Relationships with public administrations must be always clear, transparent and correct and such so as not to be susceptible to ambiguous or misleading interpretations.

Specifically, Recipients must not try to improperly influence the decisions of the public administration by offering money or other benefits, such as work or commercial opportunities that could favour the public officials or persons in charge of public services, or their relatives.

To guarantee the greatest transparency in relationships with Public Administrations, it is expressly forbidden to:

- make cash payments, offer gifts or grant advantages of any kind to directors, officers or employees of Public Administrations;
- offer or accept any valuable object, service, provision or favour to obtain a preferential treatment in connection with any relationship with Public Administrations.

### 3.4 Relationships with Judicial Authorities and other Public Authorities

The management of relationships with judicial authorities and the other public authorities is exclusively restricted to those in the company with the designated responsibility.

Recipients must be as helpful and cooperative as possible towards judicial authorities and/or other institutional authorities during possible checks or inspections ordered by them.

The Recipients who, due to events concerning to the working relationship, are subject, even on a personal basis, to investigations and inspections or who receive summons, and/or those who are served other judicial orders must inform the Supervisory Body of BRANDART.

### 3.5 Relationships with Political and Trade Union organizations

The resources of the Company are exclusively intended for the pursuits of the statutory objectives, in compliance with principles of legality, correctness and effectiveness of each management and/or financial act. The Company does not finance, or support otherwise, even indirectly, companies or other entities for profit, political parties and trade unions, unless, in this last case, contributions are prescribed by law.

Any initiative on this subject by Recipients must be considered exclusively personal, involving no cost to the Company and no involvement of its image and institutional role. It is, however, completely forbidden for Recipients and their relatives to promise or pay cash, goods or other benefits to political parties or trade unions, or their representatives, to promote the alleged interest of the company or to obtain for it an alleged advantage.



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### 3.6 Relationships with the media

The relationships with “mass media” are exclusively reserved to individuals with roles designated for this purpose.

The relationships with “mass media” are developed in the respect of the right to information.

The company’s external communication must follow the guidelines of truth, correctness, transparency, prudence and must be intended to foster understanding of corporate policies and programs and the projects of the Company.

The information provided to “mass media” must be precise, coordinated and consistent with the principles and policies of the Company; it must be compliant with laws, rules, practices of professional conduct, and must be clear and with transparent. It is absolutely forbidden to disclose fake news.

Any employee that is contacted by a representative of the mass media must immediately inform the competent corporate person and share in any initiative regarding the disclosure of facts and/or news concerning the Company.

### 4 VIOLATIONS AND PENALTIES

All Recipients, who become aware of a presumed violation of this Code of Conduct or behaviours not compliant with the rules of conduct adopted by BRANDART, must promptly inform the Supervisory body of the company. The Supervisory body of BRANDART must verify the validity of the presumed violation, by hearing, if the case requires it, the person who made the report and/or the presumed author.

Furthermore, it is compulsory that information concerning official acts not in compliance with rules and regulations (e.g. orders by Bodies of the judicial police, requests of legal assistance sent by managers and/or employees in case of the start of judicial proceedings, etc.) must be sent to the Supervisory Body of BRANDART.

The measures deemed appropriate must be adopted against the authors of unlawful conduct, irrespective of the possibility of criminal prosecution by a judicial authority, by informing the competent corporate office about the penalty imposed.

The compliance with the provisions of this Code of Conduct must be considered essential part of the contractual obligations of employees. Infringements of the provisions of the Code of Conduct represent a non-fulfilment of the obligations of the labour relation and/or professional misconduct, in compliance with the applicable local legislation and in particular for Italian companies in compliance with the procedures envisaged by art. 7 of the Workers' Statute and applicable collective labour agreements, with all consequences provided for by law, even as regards the conservation of the labour relation, and it can entail compensation for damages.

Compliance with the Principles of this Code of Conduct are part of the contractual obligations of collaborators, consultants and other individuals in a business relationship with the company.

The possible violation of the provisions therein contained can represent a non-fulfilment of the contractual obligations, with all consequences provided for in law regarding the termination of the agreement or appointment assigned, and compensation for damages caused. BRANDART is committed to include in agreements with suppliers, collaborators and external consultants, express termination clauses with reference to cases of violation of the Code of conduct.



# BRANDART

BRAND PACKAGING AND DISPLAY

## CODE OF CONDUCT



### 5 APPROVAL OF THE CODE OF CONDUCT AND RELATED REVISED VERSIONS

This Code of Conduct replaces the previous version and has been adopted following the decision of the Sole Director of BRANDART on 30<sup>th</sup> May 2017 which was immediately effective.

Possible further specific rules arising from local procedures or legislation can be included in specific further codes of conduct to be adopted in addition to this Code of Conduct and annexed to it.

The Code of Conduct does not replace any current and future corporate procedures that are still effective to the extent that they are not in conflict with the Code of Conduct.

### 6 ANNEXES

The annexes indicated below are an integral part of the Code of Conduct. When entering into an agreement these documents, as noted above, are delivered to Suppliers of goods and (non-consultancy) services and contain an extract of this code and specific indications of the commitments to be undertaken by the latter, as well as the detailed clarifications consistent with principles, values and rules contained in this document.

**ANN.1: CODICE CONDOTTA FORNITORI**

**ALL.2: SUPPLIERS CODE OF CONDUCT**

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