

CODE OF ETHICS of Gampack srl

1. Scope of application

The Code of Ethics of GAMPACK S.R.L. applies, without exception, to the governing bodies of the Company, its employees and associates of all kinds (the "Addressees").

GAMPACK S.R.L. (hereinafter referred to as "GAMPACK" or "the Company") also asks all natural and/or legal persons with whom it has established, or intends to establish, either permanently or temporarily, relationships and relations, to ensure due compliance with the Code.

2. Ethical principles

The Code of Ethics of GAMPACK S.R.L. is an integral part of the organisation, management and control Model, and constitutes the reference point for all persons working at the Company, whether senior or subordinate personnel, with regard to the conduct to be adopted in the workplace. It provides for specific legal obligations and moral duties that define the scope of the ethical and social responsibility of each person in the Company and that, taken together, constitute an effective tool for preventing unlawful or irresponsible conduct by those acting in the name and on behalf of the Company.

In compliance with the law and the prescriptions on the exercise of corporate activities, through the Code of Ethics the Company requires all those operating within it to recognise, promote, implement and guarantee a sense of personal and professional responsibility, as well to fulfil their respective duties in view of the specific functions performed.

GAMPACK's Code of Ethics is divided into two fundamental parts, the first concerning Ethics in the workplace and the second concerning Ethics in business.

3. Ethics in the workplace

The purpose of the Code is to reiterate for the entire senior management system and company staff the commitment to engage in ethical behaviour in all circumstances, understood as follows:

- to comply strictly with the laws in force in the country;
- to act with fairness and courtesy in relations between colleagues, prohibiting any form of discrimination;

- to respect the interests of all other stakeholders (customers, consumers, institutions, public authorities and the external community);
- to perform their role with professionalism and moral integrity in a manner respectful of human dignity.

3.1 Health and safety at work

Ensuring and constantly improving high safety standards are an integral part of the work ethic and commitment of GAMPACK s.r.l. in accordance with current occupational health and safety regulations (Legislative Decree No 81 of 9 April 2008, as amended).

The Company tends to and pursues safe, healthy working conditions in its offices, for both employees and external associates, and recognises the need for a fair work-life balance.

Every employee is expected to contribute to workplace safety by observing and being aware of the rules, policies and procedures and by reporting any unsafe conditions.

3.2 Equal opportunities and non-discrimination

The integrity of the workplace applies to the Company and its employees; this means that all employees must respect each other's individuality in their differences.

GAMPACK s.r.l. offers equal opportunities and encourages diversity at all levels of the Company: acts of discrimination will not be tolerated and will be subject to disciplinary measures.

3.3 Harassment-free environment

The Company strives diligently to maintain a working environment in which people are treated with dignity, decorum and respect.

This environment must be characterised by mutual trust and the absence of intimidation, oppression and exploitation.

3.4 Open dialogue with employees

The Company is committed to maintaining constructive relationships of trust and cooperation between its employees and its representatives, as employees are the true driving force behind the Company's responsible conduct.

The company encourages dialogue between its employees, their representatives and management.

3.5 Data privacy

Personal data may only be collected for legitimate purposes and in accordance with the relevant legislation.

It may only be used for the purpose for which it has originally been collected and must not be kept longer than is permitted by law.

3.6 Conflict of interest

Employees shall fairly, objectively and impartially assess any business relationship, placing the interests of GAMPACK above any personal interest in matters relating to the Company's activities.

Employees must not use their positions to obtain direct or indirect personal advantages.

In order to protect the Company and themselves from conflicts of interest, employees are encouraged to make their managers aware of any relationships they have with an actual or potential customer, supplier or competitor.

More generally, employees must avoid being involved in transactions or activities that could constitute or give rise to a conflict of interest.

3.7 Proprietary and confidential information

Information deemed confidential must be protected from disclosure both inside and outside the Company.

Employees shall take appropriate precautions to protect the proprietary information of GAMPACK from disclosure to competitors and/or unauthorised third parties. In addition to respecting confidential information, employees must also take care to protect the confidential information of third parties (e.g. customers and suppliers), of which they come into possession by virtue of their position within the company.

4. Ethics in business

4.1 Sustainability and care for the environment

GAMPACK believes that protecting the environment is a primary factor that should also guide its business. To this end, it orients its choices in a way that guarantees the compatibility between the pursuit of its institutional aims and environmental requirements and rejects and penalises any conduct that deviates from these principles.

The Company is aware of the impact of its activities on economic and social development and on the quality of life of the community. In conducting its business, GAMPACK is thus committed to safeguarding the environment and contributing to the sustainable development of the community, in full compliance with applicable regulations, while also limiting the environmental impact of its activities, in view of the development of scientific research in this field.

4.2 Relations with customers, consultants and suppliers

GAMPACK adopts a structured, fair and ethical process to select and evaluate its suppliers in order to establish a mutually beneficial relationship with them. They are selected on the basis of objective criteria including: quality, reliability, competitive prices and ethical conduct.

4.3 Relations with communities and institutions

4.3.1 Environmental Policy

The company is aware of the influence that its activities may have, directly or indirectly, on conditions, economic and social development and the general well-being of the community through the constant job-creation, in view of future work security and economic peace of mind for families, driving a virtuous cycle of constant improvement, inspired by the provisions of the Italian constitution on work, respect for human dignity, and entrepreneurial social responsibility.

4.3.2 Economic relations with political parties, trade unions and associations

Under its Code of Ethics, applied with a careful eye to operational morality, the Company does not finance political parties, their representatives or candidates, either in Italy or abroad, nor does it sponsor conventions or events with political propaganda purposes. The Company intends to remain absolutely free of any direct or indirect pressure on political figures.

The Company does not make contributions to organisations such as trade unions, environmental associations or consumer protection associations.

However, in the context of just moral concern, the Company may only cooperate with such organisations when all the following requirements have been met:

- purposes of social community respect;
- clear, documentable allocation of resources in a fair code of ethics;
- explicit, clear establishment of the organisations cited for social and community purposes.

The Company may grant requests for contributions, limited to proposals coming from organisations and associations that are declared non-profit, without human exploitation and with no hidden speculative ends, but with precise, regular articles of association and deeds of incorporation, which must be attached to any requests for contributions. In any case, the Company may also joint organisations with medical and humanitarian support aims in initiatives of national interest.

4.3.3 Relations with institutions

Relations with the public administration and central government bodies must be organised according to precise implications of laws and regulations, without altering the company's Code of Ethics.

To this end, the Company strictly undertakes:

- to establish transparent, stable channels of communication with institutional stakeholders at community, provincial and municipal level;
- to represent the company's interests and positions in a rigorous, consistent and transparent manner, while avoiding all collusive attitudes and always putting first the precise code of ethics for its own business and for the protection of its employees' work.

4.3 Gifts, entertainment expenses and anti-corruption measures

The exchange of gifts and entertainment expenses with customers or suppliers is only permissible if of moderate value.

GAMPACK and its employees shall not use gifts or other entertainment gratuities to gain a competitive advantage. Under no circumstances is the exchange of cash or equivalent (e.g. supplies) acceptable.

Concealing gifts or entertainment in the form of charitable donations is a violation of this Code and will not be accepted.

4.4 How to speak openly

The best way for employees to talk openly is to talk to their manager or first line manager, who should promote all efforts to listen to employees, understand their questions and concerns, and act accordingly.

4.5 No retaliation

Under no circumstances may an employee who reports a problem be subject to retaliation. Any person who engages in retaliatory behaviour, regardless of the position he or she holds, will be subject to disciplinary action.

Provided that reports are made in good faith, no action will be taken against an employee who raises an issue that ultimately turns out to be inaccurate.

Abusive accusations will not be tolerated.

The Company expects all employees to uphold this Code and encourages them to stand up for what is right when there is something wrong.

5. Entry into force, publicity and effectiveness

The Code of Ethics and its amendments are approved by the Board of Directors.

The effective date of the Code of Ethics is 1.1.2023; a copy of the Code of Ethics is provided to all employees.

This Code of Ethics issued by the Company is brought to the attention of company personnel and any third party who may act on behalf of the company. All the aforementioned subjects are obliged to learn about and comply with its contents.

A copy of the "Code of Ethics for Business Conduct" must be posted on the Company notice board.

All customers, suppliers, consultants, external associates, and, in general, those who, of whatever type and nature, are in contact with the company's operations, must receive a copy of the Code of Ethics and Business Conduct, so that they can understand that the company has instituted a precise process of well-being, of attention, of safeguarding the work of its personnel, of considering man to be at the centre of the Company's moral and human interest, of also bringing the principle of social utility to the external community.

6. Implementation of the Code of Ethics within the Company

All persons working at the Company, whether senior or subordinate, are required:

- a) to read the Code of Ethics and learn about its interpretation practices;
- b) to familiarise themselves with the rules of conduct enshrined in this Code and emerging from interpretative practices;
- c) to observe this Code as a canon of ethical appropriateness of the behaviour of individuals.

All Company people are invited to report, in non-anonymous form, to the Supervisory Body [until its appointment as Legal Representative of the Company] conduct contrary to the Code of Ethics of which they have become aware, and to take steps, in relation to their respective responsibilities, to ensure that such conduct ceases as soon as possible. In any case, the reporting channels provided for in the Model ensure the confidentiality of the whistleblower's identity.

Anyone who believes that he/she has been the victim of conduct in conflict with the Code of Ethics is invited to report the incident to the Supervisory Body [until it is appointed the Legal Representative of the Company], which, after carefully assessing the specific circumstances and the seriousness of the conduct, will take the most appropriate action.

7. Implementation of the Code of Ethics in respect of third parties

In its contractual relations, the company undertakes to require third parties to comply with the provisions of this Code, for this purpose expressly specifying in each contract a commitment not to breach the principles set out therein.

Piacenza, 10.12.2022

The Chief Executive Officer
Giuseppe Gazzola



