

Ethic Code

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1 PURPOSE

This document constitutes the Code of Ethics of Tubopress Italia S.r.l and represents an essential element of our corporate identity, guiding the behaviour of all those who work to achieve the Company's objectives.

Tubopress Italia S.r.l. (hereinafter "Tubopress" or "the Company"), through this Code of Ethics, defines and disseminates the values of fairness, loyalty, integrity and transparency, which must inspire the conduct of all those involved in our activities.

Our commitment to excellence has led us to formalize the ethical principles and behavioral rules that guide our work, in order to respect the fundamental values of business ethics. This Code of Ethics reflects our dedication to compliance with the laws in force and the principles of legality, to protect our image and reputation on the market.

2 TUBOPRESS

Tubopress is a leading company in the production of plastic tube packaging for the cosmetic and pharmaceutical industries. Every step of our production process, from design to production, is carefully curated to ensure high-quality products that meet the needs of our customers.

3 GENERAL PROVISIONS

3.1 Target audience and scope

The rules of this Code apply to all employees of Tubopress and to those who work to achieve the Company's objectives, including shareholders, company representatives, external collaborators, consultants, intermediaries, agents, contractors, customers and suppliers. These subjects constitute the recipients of this Code (hereinafter "Recipients").

The Recipients are required to know and observe the content of the Code of Ethics and to contribute to its implementation and dissemination. The rules of the Code integrate the conduct provided for by the laws, regulations in force and contractual obligations. This Code is valid both in Italy and abroad, taking into account the regulatory and cultural diversity of the various local contexts.

3.2 Diffusion

Tubopress undertakes to disseminate the Code to all Recipients, so that they can conform their behaviour to its principles. The Code is published on the Company's website and is brought to the attention of all those with whom Tubopress has business relationships. The Company provides information and clarification tools on the interpretation and implementation of the rules contained in the Code.

4 ETHICAL PRINCIPLES

The Recipients of this Code must comply with the following ethical principles in the exercise of activities carried out in the interest or to the advantage of the Company

4.1 Legality

Observe national, EU and international laws, and comply with the measures taken by the competent authorities.

4.2 Honesty, fairness and anti-corruption

Adopt an integral and loyal conduct, respecting the laws in force, the Code of Ethics and the company regulatory system. Corrupt practices, illegitimate favors and collusive behavior are prohibited.

4.3 Impartiality

Avoid discrimination based on age, sex, sexuality, ethnicity, nationality, political and religious opinions.

4.4 Value of the person

Promote respect for the dignity and safety of every individual, protecting workers' rights and combating all forms of discrimination and harassment.

4.5 Transparency and completeness of information

Provide accurate, complete and truthful information in business communications.

4.6 Confidentiality of information

Protect the confidentiality of business and personal information, preventing improper or unauthorized use.

4.7 Utilization of IT resources

Use company IT resources responsibly and in compliance with company laws and regulations.

4.8 Prevention of conflict of interest

Avoid situations in which personal interests may conflict with those of the Company.

4.9 Protection of health and safety at work

Ensure a safe and healthy working environment, while complying with health and safety regulations.

4.10 Environmental protection

Adopt sustainable and environmentally friendly practices in all business activities.

4.11 Combating money laundering

Take measures to prevent and combat money laundering and other illegal activities.

4.12 Protection of competition

Promote fair competition, avoiding anti-competitive practices.

4.13 Quality

Pursuing excellence in production, ensuring high-quality products that meet customer needs.

4.14 Professional excellence

Promote the professional development of employees through continuous training and professional development.

4.15 Social responsibility

To commit to contributing positively to the community and the social context in which the Company operates.

5 CRITERIA OF CONDUCT

5.1 Corporate transparency and internal controls

Tubopress adopts an internal control system that guarantees the transparency and fairness of business operations, promoting a corporate culture based on ethics and legality.

5.2 Customer Relations

Tubopress is committed to ensuring maximum customer satisfaction, offering high quality products and respecting contractual commitments. The Company adopts transparent and fair commercial policies, providing complete and truthful information on its products.

5.3 Supplier Relations

Tubopress selects its suppliers based on quality, reliability and integrity criteria, establishing collaborative relationships based on transparency and mutual respect. The Company requires suppliers to comply with the ethical principles of this Code.

5.4 Relations with external collaborators

Tubopress employs external collaborators who share the Company's ethical values, stipulating contracts that provide for compliance with the principles of this Code.

5.5 Employee Relations

Tubopress values the contribution of its employees, promoting a positive and inclusive work environment, based on mutual respect, transparency and meritocracy. The Company is committed to guaranteeing equal opportunities, protecting the health and safety of workers, and combating all forms of discrimination and harassment.

5.6 Relations with institutions and public administration

Tubopress maintains correct and transparent relations with institutions and public administration, respecting current regulations and promoting ethical and responsible conduct.

5.7 Relations with political parties, trade unions or other organisations

Tubopress adopts a position of neutrality towards political parties and trade unions, respecting the freedom of association of its employees.

5.8 Media relations

Tubopress manages relations with the media in a transparent and professional manner, providing accurate and timely information on company activities.

5.9 Management of gifts, sponsorships and donations

Tubopress regulates the management of gifts, sponsorships and donations, ensuring that they comply with the principles of transparency and fairness, and that they are not used to obtain undue advantages.

6 REPORTING OF WRONGDOING - CHANNELS AND METHODS

6.1 Regulations

In compliance with Legislative Decree 24/23, the Company has set up a number of channels aimed at reporting wrongdoing and violations of internal regulations.

6.2 Exclusions

The following are not included among the reportable violations:

- Disputes, claims, requests related to the personal relationships of the reporting person in the workplace, such as: labor disputes and wage recriminations, interpersonal conflicts between the reporting person and other parties operating in the same work context.
- Irregularities in the management or organization of company activities,
- The news and information without foundation and acquired on the basis of rumors and not supported by no documentary evidence,
- Information that is already totally in the public domain.

6.3 Internal reporting channels provided by the Company

The Company has provided three reporting channels:

1. IT reporting - Dedicated platform
2. Postal Reporting
3. Reporting through face-to-face meeting.

6.4 IT channel - Dedicated platform

The reporting person can make a report through the *dedicated platform* that is freely accessible from the institutional website, by clicking on the menu item "*Report wrongdoing*" and proceed according to the instructions provided therein.

The platform can be connected via the "*Report wrongdoing*" menu, on the Company's institutional website or directly at the following link:

[https://areariservata.mygovernance.it/#!/WB/TUBOPRESS ITALIA](https://areariservata.mygovernance.it/#!/WB/TUBOPRESS%20ITALIA)

For further operational details relating to the use of the platform, please refer to the tutorials on the institutional website on the "whistleblowing" page.

6.5 Postal Reporting

You can make your report by post. It is advisable to enter the data of the report in two sealed envelopes, including, in the first, the identification data of the whistleblower, together with a copy of an identity document; in the second, the subject of the report; both envelopes must then be inserted in a third envelope bearing the words: "*DO NOT OPEN - Reserved / Personal to the report manager*" on the outside, sending it to the following address:

Human Resources Manager

Via Rodolfo Morandi, 66,
20054 Segrate MI

6.6 *Reporting via face-to-face meeting*

It is possible, for the reporting person, to request to be heard in person through the postal request to the above address indicating on the same "*DO NOT OPEN - Reserved / Personal to the report manager*" or by entering the request in the IT channel.

The contents of the meeting with the manager can be documented by the manager by recording on a device suitable for storage and listening or by means of a report that the whistleblower can verify, rectify and confirm by means of his signature.

7 **FINAL PROVISIONS**

7.1 *Implementation and monitoring*

Tubopress undertakes to ensure the implementation and control of this Code of Ethics, establishing an internal entity ("manager") in charge of monitoring its application and managing any reports of violations.

7.2 *Violations and sanctioning consequences*

Violations of this Code of Ethics will result in the application of disciplinary sanctions proportionate to the seriousness of the violations, in accordance with current regulations and company regulations.

7.3 *Updates*

Tubopress reserves the right to periodically update this Code of Ethics to adapt it to regulatory developments and business needs.