

This Code of Ethics, adopted by Cisaplast Spa, is a set of principles and rules whose observance by employees and collaborators is of fundamental importance for the proper functioning, reliability and reputation of Cisaplast itself. Its purpose is to disseminate the values of correctness, loyalty, integrity and transparency that must characterize the actions and behaviors of the subjects who work for the company.

To this end, Cisaplast undertakes to promote and disseminate its knowledge, as well as to ensure that the provisions contained are respected by intervening, if necessary, with the corrective actions deemed most suitable.

This Code of Ethics defines:

- general principles that characterize the ethics of Cisaplast and guidelines that regulate the relationships maintained with all counterparties;
- application rules that describe the control system for compliance with the Code of Ethics and for its continuous improvement.

The Code of Ethics is brought to the attention of employees and all those with whom Cisaplast maintains business relations through suitable communication tools.

## **1. SCOPE OF APPLICATION**

The recipients of this Code of Ethics are the members of the Administrative Body, the Statutory Auditors, the Employees, the Collaborators who work on behalf of Cisaplast and all those who work to pursue its objectives. The recipients of the Code of Ethics abstain from activities, even free of charge, behaviors and acts incompatible with the obligations associated with the relationship with Cisaplast. Cisaplast undertakes, in relations with its counterparties, to inform them of the existence of this Code of Ethics.

## **2. PRINCIPLES OF REFERENCE AND RULES OF CONDUCT**

The subjects who act to pursue Cisaplast's objectives operate in compliance with the following inspiring principles:

### **Legality, honesty and fairness.**

Cisaplast operates in compliance with current laws, professional ethics and internal procedures. The pursuit of Cisaplast's interests can never justify conduct contrary to the principles of legality, correctness and honesty. Relations with Cisaplast interlocutors are based on criteria and behaviors of correctness, collaboration, loyalty and mutual respect. Cisaplast undertakes to adopt useful and appropriate measures so that the obligation to comply with the legislation and all current regulations, as well as with the principles and procedures preordained for this purpose, is adopted and practiced by the recipients of the Code.

## **Transparency and completeness of information.**

It is Cisaplast's commitment to inform its interlocutors in a clear and transparent way about its situation and its progress, without favoring any interest group or individual.

## **Protection of personal data and confidentiality of information.**

Cisaplast protects the confidentiality and integrity of data belonging to employees, collaborators and third parties collected due to the performance of work activities, in compliance with EU Regulation 2016/679 on the protection of personal data. The recipients of such data are required to comply with the principles of protection and confidentiality of the information constituting the corporate assets of Cisaplast.

Cisaplast ensures the adoption of procedures aimed at guaranteeing the confidentiality of the information in its possession and refrains from seeking confidential data through illegal means.

## **Foresight.**

Cisaplast constantly invests in research and innovation activities, anticipating market needs and trends.

## **Conflicts of Interest.**

Cisaplast operates in order to avoid situations where the subjects involved are, or may appear, in conflict with their own interests.

## **Protection of the environment, safety and sustainable development.**

As part of its business, Cisaplast undertakes to operate in compliance with the protection of the environment, according to the principles of sustainable development.

Cisaplast considers the free competition regime an indispensable factor for the development of the economic and social community. He therefore undertakes to respect and preserve it.

The company adopts strategies aimed at improving the environmental performance of its processes and promoting the saving of resources; prohibits any activity that leads to the pollution of water, soil and subsoil and undertakes to report potential pollution phenomena.

## **Impartiality and equal opportunities.**

Cisaplast undertakes to avoid any discrimination based on age, gender, sexuality, state of health, race, nationality, political opinions and religious beliefs, in all decisions that affect relations with its interlocutors .

## **Respect for the person, health and safety.**

Cisaplast ensures respect for the physical and cultural integrity of the person and respect for the dimension of relationships with others. Cisaplast ensures that internal working conditions are respectful of individual dignity and take place in safe working environments. Cisaplast considers the safety and physical and moral integrity of all those who work to achieve the company's strategic objectives to be a fundamental value. To this end, it undertakes to promote compliance with current regulations and observance of company provisions on safety and hygiene at work, engaging in constant training activities.

Cisaplast does not tolerate requests or threats aimed at inducing people to act against the law or against the Code, or to adopt behaviors that are harmful to the beliefs and moral and personal preferences of each.

Cisaplast operates in compliance with workplace safety legislation, providing its employees with efficient and adequately maintained tools and equipment.

## **Human resources.**

Human capital represents a strategic resource for Cisaplast, through which it is able to develop and guarantee services and create value. To this end, Cisaplast undertakes to enhance its resources by making suitable training tools available to them, compatibly with company needs, ensuring continuous professional growth and the recognition of results orientation, acknowledging the necessary professional and operational autonomy, in respect for the level of responsibility of each operator. Cisaplast bases its personnel selection choices on clear, non-discriminatory criteria. Upon establishment and for the entire duration of the employment relationship, personnel receive clear information on regulatory and remuneration aspects and receive the necessary indications to adequately carry out their duties. Confidential information concerning collaborators is treated in a manner suitable for guaranteeing maximum transparency for those directly involved and inaccessibility to third parties, except for justified and exclusive business reasons.

All Cisaplast Collaborators undertake to carry out their activities with transparency, diligence and professionalism in compliance with the corporate values of the Code of Ethics.

Each Employee protects and safeguards corporate assets with responsible behavior and in line with organizational procedures and, in relations with colleagues, behaves on the basis of the principles of civil coexistence and in a spirit of full collaboration and loyalty. Each Department Manager must, with his or her behavior, set an example for his/her direct Collaborators and work to ensure that they understand that compliance with the rules included in the Code of Ethics is an essential part of the quality of work performance.

## **Relationship with Customers and Suppliers.**

Recipients relate to third parties with courtesy, competence and professionalism, in the belief that the protection of the company's image and reputation and consequently the achievement of corporate objectives depend on their conduct.

In particular, Recipients must refrain from any form of unfair or deceptive behavior that could lead customers or suppliers to rely on unfounded facts or circumstances.

Recipients are required to work constantly to offer punctual and high-quality services to customers, trying to limit any form of disservice or delay in order to maximize customer satisfaction.

Relations with suppliers are based on loyalty, fairness and transparency.

The choice of suppliers is made on the basis of objective criteria of economy, opportunity and efficiency.

The choice of suppliers on purely subjective and personal grounds or, in any case, by virtue of conflicting interests with those of the company is precluded.

Recipients must put in place all possible controls so that suppliers and customers are also able to comply with the fundamental ethical principles referred to in this Code.

#### **Relations with shareholders, auditors and statutory auditors.**

Cisaplast's relations with shareholders, auditors and statutory auditors are inspired by maximum collaboration, fairness and transparency. To this end, it is absolutely forbidden to provide false or misleading statements to the Members, Auditors and Statutory Auditors. The Employees and members of the Administrative Body undertake to provide the data necessary to guarantee correct and adequate information to the subjects indicated. In particular, the shareholders must share and be involved in the pursuit of the objectives and in compliance with the relative methods, as any unethical behavior causes negative consequences and damages the company itself.

Relations between group companies must be based on principles of sound and correct management, in compliance with the principle of transparency.

### **3. EFFECTIVENESS OF THE CODE OF ETHICS AND ITS VIOLATIONS**

Compliance with company rules and procedures as well as with the contents of this Code constitutes an essential part of the contractual obligations of the workers in accordance with current legislation. Any violation of the provisions contained in the Code of Ethics will therefore be considered by Cisaplast as a violation of the relationship of trust with the company and may constitute a breach of the primary obligations of the employment relationship or a disciplinary offence, with the related legal consequences regarding the conservation of the employment relationship and may, if necessary, lead to compensation for damages deriving from the violation itself. Violations of the Code by members of the corporate bodies may lead to the adoption by the competent corporate bodies of the most suitable measures envisaged or permitted by law. Finally, violations committed by consultants will be punishable in accordance with the provisions of the related assignments and contracts.

### **4. DISCLOSURE OF THE CODE OF ETHICS**

Cisaplast undertakes to ensure timely internal and external dissemination of this Code of Ethics through:

Posting in a place accessible to all;

Distribution to all members of corporate bodies and to all personnel;

Making available to third party recipients;

Publication on the company website;

In other forms deemed suitable.

Suzzara, 29 settembre 2022

Il Presidente di Cisaplast S.p.a.

Guiducci Barbara

