



# CODE OF ETHICAL CONDUCT

rev. E - 28/03/2025

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## INTRODUCTION

Cisaplast S.p.A. (hereinafter also referred to as "Cisaplast") was established in 1962 thanks to the vision of its founder, Walter Mantovani. With over 60 years of experience, the company has established itself as one of the leading international organizations specializing in the production of glass doors for commercial refrigeration. Today, Cisaplast represents an efficient corporate structure with the capability to seamlessly integrate design and manufacturing phases.

## VISION

Innovation is our cornerstone,  
Execution is our drive,  
Creating and managing refrigeration is our future.

## MISSION

### BE CLOSE

Cisaplast is the ideal partner for professional refrigeration manufacturers: when it comes to glass doors and state of the art hinging systems, Cisaplast is the first choice. This is due to our unique ability to always be close to our customers.

We are close when it comes to designing the best technical solution together, when it comes to getting our products on time to the customer's assembly lines optimizing their processes, when it comes to providing assistance. To guarantee all this, Cisaplast is an international group.

To face every challenge in the best possible way, following you wherever you need.

### BE STRONG

You need the right strength, capable of responding reactively to an increasingly demanding market, to be effective. Being strong means possessing know-how, having a solid supply chain, controlling production.

The Cisaplast group has over thirty engineers and designers located in various divisions branch around the world. A highly specialized force that allows both to carry out ambitious research and development projects and to respond to the technical needs of our customers with punctuality.

### BE RESPONSIBLE

For those who have been involved in energy saving and efficiency since birth, thinking responsibly is a natural instinct.

Responsibility for us at Cisaplast means thinking about the well-being of our 300 collaborators distributed in our facilities all over the world. Fostering a pleasant and stimulating work environment and investing in the growth of human capital.

Responsibility means having deep roots in the territories in which we operate, creating positive local relationships and playing our role not only as economic operators, but as active members of the community.

## **ALIGNMENT WITH SDGS**

Cisaplast endorses, and its Code incorporates, the principles of the United Nations Universal Declaration of Human Rights, the Conventions of the International Labour Organization (ILO), the OECD Guidelines for Multinational Enterprises, and references the UNI EN ISO 26000 standard.

Guided by our core values and principles, the company contributes to achieving the Sustainable Development Goals (SDGs) identified by the United Nations' Agenda 2030. In alignment with our business model, we prioritize the following:

- SDG 5: Gender Equality;
- SDG 7: Affordable and Clean Energy;
- SDG 8: Decent Work and Economic Growth;
- SDG 9: Industry, Innovation and Infrastructure;
- SDG 12: Responsible Consumption and Production;
- SDG 13: Climate Action;
- SDG 16: Peace, Justice, and Strong Institutions.

## **INTRODUCTION**

This Ethical Code, adopted by Cisaplast, comprises principles and rules whose observance by employees and collaborators is essential for the company's proper functioning, reliability, and reputation. Its purpose is to disseminate values of fairness, loyalty, integrity, and transparency, which must guide the actions and behaviors of individuals working for the company.

To this end, Cisaplast is committed to promoting and spreading awareness of the Ethical Code, monitoring compliance, and implementing suitable corrective actions when necessary.

The Ethical Code defines:

- General principles characterizing Cisaplast's ethics and guidelines regulating relationships with all counterparties;
- Application standards describing the control system for ensuring compliance with the Ethical Code and for its continuous improvement.

The Ethical Code is communicated to employees and all parties engaged in business relationships with Cisaplast through appropriate communication channels.

## 1. SCOPE OF APPLICATION

The recipients of this Ethical Code include all those who, directly or indirectly, engage in business relations with Cisaplast or act on its behalf or interest, regardless of the contractual, functional, or hierarchical nature of their relationship. Specifically, this document addresses corporate bodies' members, executives, employees, external collaborators, consultants, suppliers, business partners, and any third parties involved in company activities or who play a significant role within the value chain. Particularly in relations between Cisaplast and business partners, the latter are expected to adopt behaviors reflecting the values and principles outlined in this document. The provisions herein apply across all operational areas of the company and require a concrete and ongoing commitment to ensure adherence to the behavioral rules and values defined herein.

## 2. GUIDING PRINCIPLES AND CODE OF CONDUCT

Individuals acting to pursue Cisaplast's objectives must operate in compliance with the following guiding principles.

### **Legality**

Cisaplast operates in accordance with applicable laws, professional ethics, and internal procedures. The pursuit of the company's interests can never justify behavior that violates the principles of legality, fairness, and honesty. All relationships with Cisaplast's stakeholders are based on fairness, cooperation, loyalty, and mutual respect. Cisaplast is committed to adopting the necessary and appropriate measures to ensure that all recipients of this Code recognize and uphold the binding requirement to comply with legislation, regulations, and the principles and procedures established for this purpose.

### **Product Quality and Safety**

Cisaplast is committed to ensuring the highest standards of quality and safety for its products, in compliance with current regulations and international standards. Every stage of the production process is aimed at achieving customer satisfaction through strict control over materials, processes, and product performance. The company holds UNI EN ISO 9001:2015 certification, which attests to the effectiveness of its quality management system.



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## **Transparency and Completeness of Information**

Cisaplast is committed to providing clear and transparent information to all stakeholders regarding its status and performance, without favoring any specific interest group or individual.

## **Foresight**

Cisaplast continuously invests in research and innovation to improve the efficiency of its products and anticipate market needs and trends. Innovation is pursued through the adoption of specialized technologies, the ongoing refinement of production processes, and a focus on product functionality.

## **Flexibility**

Cisaplast regards flexibility as a key value to ensure efficiency, responsiveness, and adaptability in a constantly evolving context. The company implements organizational and production solutions that allow it to respond quickly and effectively to diverse market demands, aiming to ensure timely responses and customized final outcomes.

## **Environmental Protection, Safety, and Sustainable Development**

In its operations, Cisaplast is committed to protecting the environment in line with the principles of sustainable development. Cisaplast views free market competition as essential to the advancement of economic and social communities and pledges to respect and preserve it.

The company adopts strategies to improve the environmental performance of its processes and promote resource conservation. It prohibits any activity that could lead to pollution of water, soil, or subsoil, and is committed to reporting potential environmental hazards.

## **Impartiality and Equal Opportunities**

Cisaplast is committed to preventing all forms of discrimination based on age, gender, sexuality, health status, race, nationality, political opinions, or religious beliefs in any decisions affecting its relationships with stakeholders.

## **3. RELATIONSHIPS WITH EMPLOYEES AND BEHAVIORAL STANDARDS**

Human capital represents a strategic resource for Cisaplast, enabling the company to develop services and create value.

In this context, the Ethical Code defines a set of principles, rules, and behavioral standards that every employee is required to follow—both in their daily tasks and in interactions with colleagues, superiors, collaborators, and third parties. These provisions aim to foster conduct based on integrity, transparency, professionalism, and mutual respect, thereby contributing to a work environment that encourages trust, collaboration, and open dialogue among all parties involved.

## 3.1 STAFF RECRUITMENT AND HIRING

The recruitment and hiring process is based on specific principles, including a preliminary analysis of organizational needs and an effective match between the required professional profile and the candidates' skills, experience, and personal attributes.

Recruitment procedures are grounded in impartiality, objectivity, and respect for equal dignity, ensuring that access to professional opportunities is based on merit and alignment with the functional requirements of the role.

No discrimination is allowed on the basis of gender, ethnic origin, religion, nationality, age, sexual orientation, disability, or any other personal or social characteristic unrelated to professional requirements.

From the start and throughout the duration of employment, personnel receive clear information regarding regulatory and compensation aspects, along with the guidance necessary to properly carry out their roles.

The selection process is conducted in full compliance with privacy regulations and confidentiality of the information provided by candidates, avoiding any misuse of collected data.

## 3.2 DIVERSITY AND INCLUSION

Diversity and inclusion are strategic values for the company and essential elements in ensuring a fair, collaborative, and dynamic work environment that embraces and enhances each individual's uniqueness and differences.

The organization is committed to providing a workplace where everyone is treated with respect and can feel fully integrated within the company system. Cisaplast adopts inclusive organizational policies that foster dialogue and promote the value of different individual perspectives, believing that a plurality of experiences drives innovation, adaptability, and competitiveness.

The organization holds gender equality certification in accordance with the UNI/PdR 125:2022 Guideline, implementing a structured system for monitoring and continuously improving its internal policies.

## 3.3 HEALTH AND SAFETY

Cisaplast considers the health and safety of workers a fundamental value and a top priority, dedicating itself to protecting the physical integrity and psychological well-being of all employees.

The company fully complies with applicable regulations, particularly Legislative Decree 81/2008 and its subsequent amendments.

Cisaplast ensures the development and regular updating of the Risk Assessment Document (DVR), a key tool for identifying, evaluating, and mitigating risks across all company activities.

The company invests continuously in employee training and awareness, promoting a widespread culture of prevention in which each employee is called upon to contribute personally to workplace safety.

Cisaplast monitors its performance in this area and adopts a continuous improvement approach to achieve and maintain the highest protection standards, ensuring a safe, healthy, and well-being-oriented work environment for every employee.

## **3.4 TRAINING**

Cisaplast is committed to enhancing its human resources by providing appropriate training tools, in line with business needs, to ensure continuous professional growth and recognition of performance-oriented results. The company fosters professional and operational autonomy while respecting each employee's level of responsibility.

In addition to fulfilling mandatory training requirements set by current regulations, Cisaplast also implements additional training programs designed to further develop the technical and specialized skills needed for various company activities.

In doing so, Cisaplast aims to stimulate individual responsibility, a sense of belonging, and a culture of continuous learning to help every employee fully express their potential within the workplace.

## **3.5 CODE OF CONDUCT**

Cisaplast requires its employees to adopt behaviors inspired by professionalism, responsibility, and mutual respect, always acting with transparency, fairness, and integrity.

In carrying out their duties, all employees must strictly observe company regulations and applicable legislation, refrain from any actions that could harm the company's image or reputation, and reject all forms of favoritism, conflicts of interest, or abuse of their position.

Offering or accepting money, gifts, benefits, or other advantages—except for items of modest value that are not intended to obtain or grant improper advantages—is strictly prohibited.

In every circumstance, employees are expected to adopt conduct aimed at protecting the company's interests, ensuring operational efficiency, and building relationships based on trust, transparency, and loyalty, thereby contributing to the achievement of corporate objectives in accordance with the ethical standards outlined in this document..

### **3.5.1 CONFLICT OF INTEREST**

Cisaplast employees must avoid any situation or behavior that could potentially result in a conflict of interest—that is, a circumstance in which personal interests could interfere with the ability to act in the company's best interests. Employees are therefore prohibited from using their position to gain personal benefits, favor third parties, or use confidential information for purposes unrelated to company interests.

Employees are expected to act with complete integrity, avoiding any conduct that could appear to pursue interests other than those of the company. Their decisions and behavior must be guided solely by internal rules, without being influenced by personal obligations or relationships that could compromise the proper performance of their duties.

### **3.5.2 PROTECTION OF COMPANY ASSETS**

Everyone operating within the organization is responsible for safeguarding and protecting company assets through responsible behavior in accordance with organizational procedures.

Specifically, any improper, personal, or unauthorized use that could cause direct or indirect damage to the company—compromising operational efficiency, security, or the protection of corporate assets—is strictly prohibited. These assets include movable and immovable property, technological resources, documents, data, and confidential information, all of which must be managed in accordance with company and legal policies.

It is also forbidden to use company assets for non-business-related purposes or to derive direct or indirect personal gain or benefit for third parties.

Theft, destruction, misappropriation, or alteration of company assets—as well as unauthorized access to data, confidential information, or technological resources—is also strictly prohibited.

### **3.5.3 IT ASSETS**

The company's IT assets—including hardware, software, networks, communication systems, databases, and all other technological resources—are essential to the organization's operations.

All company personnel are required to use these resources responsibly, exclusively for business purposes, and in full compliance with applicable laws, internal policies, and the purposes for which the resources were provided.

It is strictly forbidden to access systems or information without authorization, install unapproved software, share personal credentials, or use company networks for illegal or non-work-related activities.

### **3.5.4 INTELLECTUAL PROPERTY RIGHTS**

All individuals subject to this Ethical Code—including employees, collaborators, suppliers, and business partners—are required to safeguard and respect the company's intellectual property rights. They must refrain from disclosing or misappropriating confidential information, trade secrets, know-how, or any other element that constitutes intangible and strategic assets of the company.

Disclosing documents, technical data, production processes, projects, or business strategies to third parties without explicit authorization is strictly prohibited.

The organization also expects its employees and collaborators to respect third-party intellectual property rights, committing not to improperly use copyrighted materials, patents, registered trademarks, or any other form of intellectual property belonging to external parties, in full compliance with applicable laws and regulations.

## **4. PRINCIPLES GOVERNING BUSINESS CONDUCT**

Cisaplast recognizes the fundamental importance of basing its business activities on ethical principles and shared values, considering them essential elements for ensuring responsible management aimed at the common good. The company is committed to operating with transparency, fairness, and integrity in all areas of its work, adopting an approach that emphasizes compliance with applicable laws, protection of stakeholder interests, and the promotion of a culture rooted in mutual trust.

### **4.1 BOOKKEEPING AND ACCOUNTING RECORDS**

The organization is committed to ensuring the highest level of accuracy, completeness, and compliance with applicable regulations in the maintenance of its accounting records.

All business transactions must be promptly recorded and supported by appropriate documentation that confirms their legitimacy and consistency with internal procedures.

The accounting system enables full traceability of all operations, ensuring that information is always accurate, verifiable, and suitable for meeting fiscal and legal obligations.

### **4.2 DATA SECURITY AND PROTECTION**

Cisaplast protects the confidentiality and integrity of data belonging to employees, collaborators, and third parties, collected in the course of business activities, in compliance with EU Regulation 2016/679 on personal data protection (GDPR).

Recipients of such data are required to adhere to the principles of protection and confidentiality regarding information that constitutes part of Cisaplast's corporate assets.

The organization ensures the implementation of procedures that safeguard the confidentiality of the information in its possession and refrains from seeking out confidential data through unlawful means.

## 5. RELATIONSHIPS WITH EXTERNAL PARTIES

### 5.1 CUSTOMERS

Cisaplast conducts its customer relationships in accordance with the principles of fairness, transparency, and professionalism, aiming to build long-lasting relationships based on trust and shared values.

Every interaction is managed in compliance with company policies and contractual obligations, ensuring that every contract, agreement, or business transaction is handled with maximum transparency and in line with the organization's ethical principles.

The company is committed to providing timely, high-quality services, striving to minimize any disruption or delay in order to maximize customer satisfaction.

Every Cisaplast product is designed and manufactured to meet strict quality standards and in full compliance with applicable regulations.

Cisaplast ensures that every stage of the production cycle—from design to the final product—meets established quality standards, in order to deliver efficient, safe, and cutting-edge solutions to its customers.

### 5.2 SUPPLIERS

In its relationships with suppliers, Cisaplast is committed to establishing and maintaining long-term, mutually beneficial partnerships capable of generating shared value while directly and effectively supporting the organization's operational activities.

To ensure efficient collaboration, the company encourages its suppliers to maintain proactive communication, fostering ongoing dialogue to identify potential issues and develop shared solutions.

Partnership is regarded as a key factor in improving production and logistics processes, ensuring the achievement of business objectives and stakeholder satisfaction.

Supplier selection is based on clear and transparent criteria, including operational competence, cost-effectiveness, proven reliability, alignment with the company's ethical values, compliance with applicable regulations, and adherence to minimum ESG (Environmental, Social, and Governance) standards.

The selection of suppliers based solely on subjective or personal considerations, or in pursuit of interests conflicting with those of the company, is strictly prohibited.

Suppliers—according to their size, resources, and organizational capabilities—are expected to develop plans aimed at reducing the environmental impacts of their activities.

They are required to take measures to reduce greenhouse gas emissions in line with the commitments of the Paris Agreement, aimed at limiting global warming to 1.5°C.

At the same time, the company requires its suppliers to operate in full respect of fundamental human rights, with particular attention to preventing any form of labor exploitation, including child labor.

The company demands that suppliers guarantee safe and dignified working conditions, in compliance with occupational health and safety regulations, and promote practices that protect the dignity and well-being of every worker.

If a supplier fails to comply with the company's principles, Cisaplast reserves the right to seek alternative sourcing solutions.

### **5.3 SUBCONTRACTORS AND EXTERNAL COLLABORATORS**

Cisaplast recognizes the crucial role played by subcontractors and external collaborators in ensuring the efficiency of its production processes and the quality of its services. These parties are considered key strategic partners, with whom the company establishes collaborative relationships based on shared goals.

The company selects its subcontractors and external collaborators according to objective and transparent criteria, considering the competence and reliability required for the work to be performed. Cisaplast promotes relationships grounded in fairness, loyalty, and mutual respect, and requires professional, responsible conduct in line with the defined quality standards.

### **5.4 AUDITORS, STATUTORY AUDITORS, AND SHAREHOLDERS**

Cisaplast's relationships with auditors, statutory auditors, and shareholders are based on the highest standards of cooperation, fairness, and transparency. Accordingly, it is strictly forbidden to provide false or misleading information to any of these parties.

Employees are committed to supplying accurate and appropriate data to ensure proper reporting to the indicated stakeholders.

In particular, shareholders are expected to be active participants in achieving company objectives and in complying with agreed-upon procedures, as unethical behavior has negative consequences and damages the company.

Relationships among group companies must be based on principles of sound and proper management, in full respect of the principle of transparency.

### **5.5 PUBLIC ADMINISTRATION**

Cisaplast maintains relationships with public administration entities in full compliance with applicable laws.

It is strictly prohibited to offer, promise, or authorize the transfer of money, goods, services, or other benefits to public officials or equivalent individuals in order to induce them to act or omit to act in violation of their official duties.

The company also refrains from exerting any undue pressure on public officials—whether to obtain favorable decisions or to negatively influence their actions or behavior—in an attempt to gain advantages or promote its own interests.

All relationships with public administration authorities must be characterized by impartiality and full compliance with service obligations.

## 5.6 COMPETITOR COMPANIES

Cisaplast explicitly avoids anti-competitive practices such as restrictive agreements, collusive arrangements, abuse of dominant market position, or any other conduct that could distort market dynamics, hinder the entry of new competitors, or limit customer choices.

Furthermore, the company does not improperly influence or disclose the pricing policies, operational strategies, or commercial plans of competing firms.

Cisaplast avoids any form of agreement or understanding with other companies that could limit competition, manipulate the market, or create monopolistic situations.

## 5.7 LOCAL COMMUNITY

Cisaplast is aware of the importance of the social and territorial context in which it operates and the potential impact its activities may have on the local area and surrounding community.

For this reason, the company is committed to conducting its business while actively promoting and supporting educational and social initiatives.

## 6. IMPLEMENTATION OF THE ETHICAL CODE AND SANCTION SYSTEM

This document is approved by the CEO. Within the company, it is posted on the company noticeboard and communicated to all employees, who are required to receive a printed or digital copy and to observe the principles and rules set forth herein. Additionally, the Ethical Code is published on the company's website.

For third parties (suppliers, consultants, etc.), compliance with the contents of this Code is a fundamental condition for entering into any type of contract with the organization. These provisions form an integral part of such contracts.

### 6.1 VIOLATIONS AND DISCIPLINARY SANCTIONS

Compliance with company rules, procedures, and the contents of this Code constitutes an essential part of employees' contractual obligations under applicable law. Any violation of the provisions in the Ethical Code will therefore be considered by Cisaplast as a breach of trust and may constitute a failure to fulfill primary employment obligations or a disciplinary offense. Such violations may lead to the consequences provided for by law, including potential termination of employment and, where applicable, liability for damages resulting from the violation.

Violations committed by individuals operating within the organization may result in the adoption of appropriate measures permitted by law. If the violation is committed by third parties engaged in collaboration or partnership with the company, the contractual relationship may be terminated if the infraction is deemed incompatible with the continued trust-based relationship.

## 6.2 REPORTING A VIOLATION

Anyone who, in the course of their work, becomes aware of potential violations of applicable laws or of the principles set forth in this Code may file a report using the dedicated whistleblowing channel accessible via the company's website. This channel is designed to be secure, confidential, and compliant with applicable legislation.

Such reports, in accordance with the provisions of Legislative Decree 24/2023, will be handled with the utmost confidentiality and transparency, guaranteeing full protection for the whistleblower against any form of retaliation, discrimination, or penalization, whether direct or indirect.

Cisaplast is committed to promptly investigating all reports received. If the investigation confirms the existence of a violation, appropriate measures will be taken, proportional to the seriousness of the offense and in compliance with applicable legal and regulatory provisions.

## 7. REVIEW AND UPDATE

This document will be reviewed and updated in the event of regulatory changes or organizational needs that require its revision. Proposed amendments will be evaluated and approved by the company's highest governing body, which will ensure consistency with the company's core values.

The updated version of the Ethical Code will be communicated to all recipients to ensure full understanding and proper implementation.

*Suzzara, March 28<sup>th</sup>, 2025*



**CEO**  
**Guiducci Barbara**