

CODE OF ETHICS

Approved by resolution of the Board of Directors of Sipla Stampaggio S.r.l. on **31.01.2024**





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1.

INTRODUCTION

This Code of Ethics is the main tool for the promotion and dissemination of the values and principles of conduct, rights, duties and responsibilities that all those working for Sipla Stampaggio S.r.l. (hereinafter also, for the sake of brevity, ‘Sipla’ or ‘Company’) **must observe**, whether they are employees, collaborators in any manner or other persons involved, directly or indirectly, in the Company’s activities.

Sipla conforms the conduct of its activities to the principles and rules of conduct set out in this Code of Ethics and in the national and international regulations in force where applicable, in order to ensure that business decisions and conduct are marked by the highest standards of fairness, diligence, ethicality and loyalty.



The Company hopes for the spontaneous adherence, sharing and dissemination of these principles and demands the observance and application of this Code by every individual who works on behalf of Sipla, or who comes into contact with them, also providing for the application of disciplinary and contractual sanctions for any violations.

Sipla recognises the importance of ethical-social responsibility in the conduct of its business and activities and, therefore, promotes management that balances the legitimate interests of its Stakeholders, as defined below, and the community it operates in.

Sipla's Stakeholders are all bodies and individuals who can reasonably be expected to be significantly affected by the Company's activities, products and services and/or whose actions can reasonably be expected to affect the Company's ability to successfully implement its strategies and achieve its objectives.

2.

RECIPIENTS

The principles and provisions of this Code of Ethics must be respected by the “Recipients”, i.e.: administrators, employees, agents, consultants, collaborators, business partners and all those who work for Sipla, regardless of the relationship that binds them to the Company.

This document does not intend to exhaustively describe the specific conduct to be adopted in every situation that may occur but, rather, aims to formulate a **set of principles and general guidelines that the recipients of the Code must follow** when carrying out their work tasks.



Therefore, in the absence of regulations containing specific rules of conduct, **everyone has the duty to make and oblige their employees and interlocutors to carry out actions that are guided by the highest standards of conduct**, in compliance with the principles set forth in this Code and the rules of law in force.

Sipla considers the observance of the rules and provisions contained in this Code of Ethics to be an integral and essential part of the contractual obligations arising, for employees, from employment relationships, also pursuant to article 2104 of the Civil Code, and, for non-employee collaborators, from their respective contractual regulations.

Violation of the aforementioned rules and provisions will constitute a breach of the obligations arising from the employment or collaboration relationship, with all consequences of law or contract.

Sipla ensures the dissemination of this Code to all Recipients through specific communication activities.

3.

GENERAL PRINCIPLES

3.1. Lawfulness

Complying with the law and legal system regulations of each country where Sipla operates, represents a basic principle that each employee must observe, together with Sipla's policy, when carrying out their activities.

Violation of the law is not permitted for any reason whatsoever.

3.2. Respect, honesty

Each employee recognises and respects the personal dignity, privacy and personality rights of any individual, of whatever nationality, culture, religion, age, disability, race or sexual identity.

In line with institutional principles and in compliance with the labour laws in force in the different countries where Sipla operates, **discrimination against anyone according to any of the aforesaid characteristics, or harassment or sexual, personal or other offenses are not tolerated.**

These principles shall also apply in collaborative relationships within the Company and in relations with third parties.

Decisions made with regard to collaborators – whether they are colleagues, employees, suppliers, customers and business counterparts – **are only based on unbiased considerations and not dictated by considerations of undue discrimination or coercion.**

When carrying out individual functions, **each employee shall act with transparency and honesty, undertaking responsibilities of their competence** according to their duties.

3.3. Prevention of conflict of interest

Sipla employees shall, when performing their tasks, be obliged to make decisions in the best interests of the Company and not based on their own personal interest. Conflicts of interest can arise in cases where employees carry out activities or place their economic and professional interests at the expense of the interests of Sipla. **Employees who have any personal interest in the exercise of their duties must immediately inform their manager.**

Employees are prohibited from using companies with which they have business relations in order to perform their work for Sipla for their own personal contracts or orders, if they can obtain personal benefit in relation to these contracts or personal orders.

Employees are not permitted to conduct or carry out activities in favour of competitors of Sipla or engage in competitive activities.

Unless further regulated by internal regulations,
Employees who hold or take on shareholdings, direct or indirect, in the share capital of a competing company, or of a supplier or customer of Sipla, must inform their Personnel Manager.

Following disclosure of share capital participation of a third party company, Sipla shall have the right to implement appropriate measures to eliminate any potential conflict of interest.

3.4. Processing of personal data

Il trattamento dei dati personali è consentito solo nella Processing of personal data is only permitted to the extent in which collection, processing or use of the said data are necessary for predetermined, defined and legitimate purposes. In addition, personal data must be kept safely and necessary precautions must be implemented with regard to their transmission. The highest standards of data and protection quality must be guaranteed against unauthorised access. Use of personal data must occur in complete transparency to the persons concerned, who have the right to verify its use and accuracy of information and, where appropriate, challenge them, block their use and provide for their cancellation.



In certain jurisdictions (such as Italy and the European Union), **there are strict laws and regulations in force with regard to processing of personal data**, including data relating to third parties, whether they are customers or commercial counterparties.

All employees are required to comply with these laws, insofar as applicable, to protect the privacy of third parties.

All employees seek to treat all information obtained in connection with the performance of their work as confidential and, therefore, not to disclose it except within the limits of the use of such information for the performance of their work and in compliance with the principle of transparency.

3.5. Anti-money laundering and the fight against organised crime and terrorism

Sipla is committed to complying with all national and international rules and regulations on anti-money laundering and countering terrorism.

Sipla abstains from any kind of relationship, even if indirect or through intermediaries, with persons (natural or legal persons) who are known or there is reason to suspect that they are part of criminal organisations of any kind, including mafia-type organisations, those involved in human trafficking or the exploitation of child labour, as well as persons or groups operating for the purposes of terrorism.

4.

EXTERNAL RELATIONS

4.1. Trading principles

Sipla complies with all the regulations on export control and customs laws applicable in the countries in which it operates. Export controls generally apply to the transfer of goods, services or technologies outside certain national borders, including electronic means.

The laws on the control of exports shall apply in relation to exports or imports, direct or indirect, respectively to or from countries or sanctioned parts reported, for example, for reasons of national security or involvement in criminal activities. **Violations of these laws and regulations can result in severe penalties,** including fines or the revocation by the government to import and export simplified procedures (interruption of the continuous supply chain).

Employees who are involved in import and export of goods, services or technologies in the manner indicated above must comply with the applicable laws and regulations on the control of exports and imports, as well as comply with every policy and procedure in matters established by the industry in which they work.

4.2. Customer relations

The conduct of Sipla's employees and collaborators towards customers is characterised by helpfulness, clarity, respect, courtesy and the utmost understanding of needs.

All the recipients of this code undertake to operate in full compliance with the regulations in force and to respect at all times the commitments and obligations they have undertaken, and **they shall also abide by the truth in advertising or other communications.**

Employees and collaborators are prohibited from granting benefits and gifts to customers, either directly or indirectly, unless the value, nature and purpose of the gift are considered legal and ethically correct, such that it cannot be interpreted as a means of obtaining favourable treatment for the company.

Sipla is committed to ensuring high quality standards for its products and services, based on contractually recognised and systematically monitored levels.

4.3. Relations with suppliers

Sipla demands that its suppliers comply with all applicable laws and share its values and principles, assuming their responsibility to the people involved and the environment and is committed to:

- **comply with applicable laws;**
- **enforce corruption prohibition;**
- **respect the basic human rights of employees; observe laws prohibiting child labour;**
- **undertake the responsibility of the health and safety of employees;**
- **safeguard the environment in compliance with applicable laws;**
- **comply with this Code, as well as with the Code of Conduct for Suppliers of the Company.**

Sipla pursues fair and impartial verification of offers from its suppliers.

Each employee shall comply with supplier selection and award procedures established by the Company. In any case, in the contract relations, administration, procurement or supply of goods or services, **Employees must comply in particular with the following regulations as part of their duties:**

- i. each employee must inform his or her supervisor of any personal interest in the performance of his or her duties that could lead to a conflict of interest;**

- ii. in case of competing offers, suppliers must not be unfairly favoured or hindered.**

Consequently, the employee shall not preclude applicant suppliers who meet qualification requirements from time to time required, from the chance to win the supply in question, adopting, should the need arise, assessment and objective selection criteria and in a transparent manner.



4.4. Relations with the public administration

Sipla competes fairly on the market to acquire orders, relying on quality, price and innovation of its products and services, not offering unfair advantages to third parties.

Accordingly, each employee must not offer, promise, grant or authorise - directly or indirectly - the giving of sums of money or any other benefit to natural persons who are public officials or persons in charge of a public service in order to influence an official act or obtain an undue advantage. **Any offer, promise, grant or donation must be made in accordance with applicable laws and with the company policies, and must not in any way give the impression of bad faith or misconduct.**

Furthermore, employees must not give sums of money or any other benefit indirectly (e.g. to a consultant, agent, intermediary, partner or other third party), if the circumstances suggest that these may, in whole or in part, directly or indirectly, be intended for natural persons who are public officials or persons in charge of a public service in order to influence an official act or to obtain an undue advantage.



4.5. Contributions, donations and sponsorships

Sipla refrains from making any contribution, direct or indirect, in any form whatsoever, to political and trade union parties, movements, committees and organisations, their representatives and candidates, except for those due and/or permitted under specific provisions of law.

In any case, donations are prohibited:

- **to organisations whose objectives are not compatible with the company's principles of Sipla;**
- **that damage the reputation of Sipla.**

Transparency of each donation must be guaranteed.

Therefore, the recipient of the donation must be known together with its actual use; it is always important to account for the reason for the donation and its use for a particular purpose.

Sponsorship is understood as a contribution in cash or in kind by Sipla in favour of an event organised by a third party in exchange for the opportunity to give Sipla brands visibility through, for example, exposure of the Sipla logo, quoting Sipla in opening and closing speeches, participation of a speaker at a round table and tickets for the event itself.

All contributions made in the form of sponsorship must be given in a transparent manner and regulated by a written agreement, must pursue a legitimate business purpose and be appropriate to the return offered by the organiser of the event.

Moreover, these contributions must not be promised, offered or granted to organisations whose goals are incompatible with Sipla company principles.

5.

RELATIONS WITH STAFF

5.1. Staff recruitment and non-discrimination

Staff selection procedures are carried out according to transparent criteria, respecting equal opportunities, privacy and the opinions of the applicant.

The Company undertakes to avoid favouritism and patronage practices in the selection and recruitment stages. All staff are employed under regular employment contracts **in accordance with the laws in force and no irregular employment is allowed.**

Sipla does not implement or tolerate any form of discrimination based on nationality, gender, race or ethnic origin, religion, political opinion, age, sexual orientation, disability or health status, whether in recruitment and remuneration policies, access to training, career paths, dismissal or retirement of staff:

- **during selection and recruitment, is committed to preventing gender inequality and any other form of discrimination;**
-



- **professional development and promotions are based solely on professional skills and levels;**
- **is committed to a working environment that fosters diversity and protects the mental and physical well-being of employees;**
- **offers adequate work-life balance tools;**
- **fully implements legal provisions and collective agreements on combating harassment in the workplace;**
- **pays constant attention to the language used, sensitising communication to be as polite and neutral as possible.**

5.2. Employee duties

Each employee performs his or her duties with commitment, care, a sense of responsibility, loyalty and seriousness, in full compliance with the law, contracts and regulations and company directives.

Interpersonal relations must be characterised by respect for the person, his or her dignity and values, avoiding behaviour and speech that is offensive or can be connoted as harassment.

All employees are required to avoid situations that lead to a conflict of interest and to refrain from taking personal advantage of business opportunities of which they become aware in the course of their duties.

Every employee and collaborator, at any level, **is obliged to strictly respect the confidentiality of data and information learned in the course of his or her work**, and to preserve and protect the integrity, confidentiality and access to the company information entrusted to him or her.

All employees must constantly pay the utmost attention to safety at work, in particular, must:

- **contribute to fulfilling the obligations provided for under current laws with regard to health and safety at the workplace;**
- **comply with the provisions and instructions given by Management and various function Managers;**
- **use systems, machinery, equipment and means and company vehicles correctly;**
- **appropriately use protection devices made available without taking any personal initiatives to modify them, and to report any defects or problems,**
- **immediately report faults to systems, machinery, equipment and devices and other company vehicles, and any dangerous condition of which they become aware to their various function Managers;**
- **participate in training programmes organised by the Company;**
- **not carry out any operations or handling on their personal initiative that can compromise their health and safety and that of other operators;**
- **undergo the health checks required by law or otherwise organised by the company's doctor.**



5.3. Use of company assets

Each employee and collaborator is duty bound to act with due care and diligence to protect the assets of Sipla, through responsible conduct and in line with the operating procedures established to govern use, documenting their use as appropriate and/or required.

The devices and equipment in offices and other areas of Sipla, such as phones, copiers, PCs, software, Internet, machines and other tools, including e-mail and voice mail systems, **must only be used for work-related reasons and not for personal use.**

Locally, it is possible to establish exceptions and possibly agree on paid use, provided that use of company assets:

- **is not connected to any illicit operations,**
- **does not create an effective or potential conflict of interest,**
- **does not entail significant additional costs, does not interfere with the business activity or with the tasks assigned to the employee or other employees.**

All employees are required to use computer or telematic tools and services in full compliance with current legislation on computer crimes, information security, privacy and copyright and with the company's internal procedures.

Employees may not load unauthorised software onto company systems, nor may they make unauthorised copies of licensed programmes for personal use or for third parties.

5.4. Accounting records and separation of duties

To ensure transparent and efficient communication, accurate and truthful reporting is essential. This indiscriminately applies to relations with suppliers, collaborators, customers and business partners as well as institutional ones addressed to the public or public authorities.

Also, Sipla has the duty to implement processes and controls that are effective and that guarantee execution of transactions according to what is authorised by management. All employees must ensure that the accounting records of Sipla drawn up by them, or requests for which they are responsible:

- **are complete,**
- **are accurate,**
- **accurately reflect every operation/activity,**
- **are immediately drawn up and in compliance with applicable accounting regulations and principles,**
- **that all transactions carried out will be used for income, capital and financial reporting purposes, both internally and externally.**

These principles also apply to the preparation of expense reports by employees, and their relative procedures for authorisation.

With regard to financial transactions, there is a strict separation of duties between those who keep a record of financial reports, verifying correspondence with purchase orders, the person making the payments, the person who authorises them and materially signs payment orders and who, at the end, checks the bank transactions via Banking.



6.

OCCUPATIONAL HEALTH AND SAFETY

6.1. Environment and technical safety

Environmental protection and the preservation of natural resources are the main objectives of the company.

Through the commitment of Managers and Employees, Sipla strives to conduct its business in order to protect the environment and continuously improve its environmental performance.

In all processing steps, technical safety and health protection are primary objectives and basic points of reference.

Each employee must contribute to pursue these objectives through their conduct.

6.2. Safety at the workplace

The health and safety of employees at the workplace is a priority for Sipla.

Everyone is responsible to promote the efforts of the Company, which are aimed at ensuring maximum safety when carrying out its company's activities.

Responsibility towards employees requires implementation of the best possible measures to prevent accidents, and is carried out through:

- **technical planning of workplaces, equipment and processes,**
- **safety management,**
- **personal conduct at the workplace.**

The work environment must comply with the requirements imposed by a safety and health-oriented design.



7.

REPORTING VIOLATIONS, SANCTIONS

7.1. Reporting violations

In order to ensure the effectiveness of this document, an adequate reporting channel has been set up to allow each Recipient to report, without delay, any conduct that may constitute a possible violation of this Code. Reports must be adequately substantiated.

All reports can be sent to the following e-mail address:

segnalazioni@sipla.eu

All documentation and the identity of the informant will be kept confidential, to the extent permitted by law, and **any form of retaliation will not be tolerated against those issuing the report.**

7.2. Sanctions

For Sipla's employees, compliance with the rules of this Code is an essential part of their contractual obligations;

therefore, their violation constitutes a breach of the primary obligations of the employment relationship and entails the adoption of disciplinary measures proportionate to the seriousness, recidivism and degree of guilt, in compliance with the provisions of the Workers' Statute, also with regard to the preservation of employment and compensation for damages.

Violation of this Code by collaborators, external consultants and other recipients is considered such a serious offence as to determine

- in the event that the relationship is regulated by a contract - **the termination of the contract**, in compliance with the law and the contract and without prejudice to the right to compensation for damages and the possibility of criminal proceedings in the event of a criminal offence.



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