



Plastimark®



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FRANCE

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**PLASTIMARK S.p.A.**

**CODE OF ETHICS**

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**1. CODE OF ETHICS**

This Code of Ethics has been approved by the Board of Directors of PLASTIMARK S.P.A.

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## FOREWORD

## THE VISION OF PLASTIMARK S.P.A.

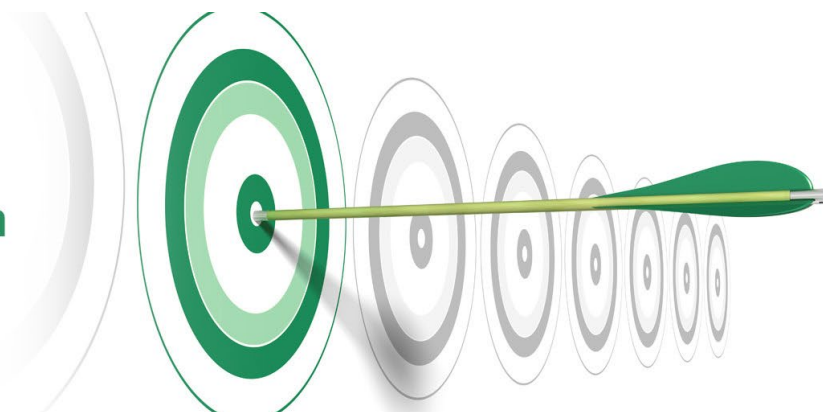
PLASTIMARK S.P.A. is aware that the authority of a company is recognised not only by the competence of its employees and the high quality of the service provided to customers, but also by the attention paid to the needs of the entire community.

The principles that have always inspired the work of this Company are formally collected in a Code of Ethics of Conduct in the conviction that reliability is built on a daily basis by respecting standards and valuing people.

This Code of Ethics therefore represents a distinctive and identifying element in relation to the market and third parties, the knowledge and sharing of which, required of all those who work in the Company or collaborate with it, constitute the foundation of our activity and the first step towards the pursuit of our mission.

The objective of PLASTIMARK S.P.A. is therefore to pursue excellence in the market in which it operates, through Sustainable Development, safeguarding the Environment and the Safety of the people involved through the consistency of a behaviour respectful of Social Ethics, obtaining satisfaction and ensuring added value for the Employee, for the Customer and, in general, for the Community.

## Mission & Vision



## PURPOSE AND RECIPIENTS

This Code of Ethics (hereinafter, the "**Code**") illustrates the set of ethical and moral principles that underlie the activity of PLASTIMARK S.P.A. (hereinafter, the "Company") as well as the lines of conduct adopted by the Company both internally (in relations between employees) and externally (in relations with institutions, suppliers, customers, business partners, political and trade union organisations as well as information bodies (hereinafter, the "**Stakeholders**").

Respect for these principles is of fundamental importance to achieve PLASTIMARK S.P.A.'s corporate mission and to ensure its reputation in the socio-economic context that it operates in.

First of all, it should be noted that PLASTIMARK S.P.A. firmly believes that every activity must be carried out ethically, recognising itself in the principle established by Art. 41 of the Constitution, according to which a private economic initiative "cannot be carried out in conflict with social utility or in a way that causes harm to security, freedom, human dignity."

This Code is binding for the directors and employees of PLASTIMARK S.P.A., as well as for all those who work and collaborate, on a permanent or temporary basis, on behalf of the Company (hereinafter, the "Recipients").

The Code will be widely disseminated within the internal governance structure, and widely communicated externally, including through its website.

PLASTIMARK S.P.A. also undertakes to adopt all further provisions so that the principles and prescriptions of the Code can be promptly disseminated and applied.

## GENERAL PRINCIPLES

The conduct of the Recipients, at all corporate levels, is marked by the principles of legality, fairness, non-discrimination, confidentiality, diligence and loyalty.

### Legality

PLASTIMARK - S.P.A. operates in absolute compliance with the law and this Code.

All Recipients are therefore required to comply with all applicable regulations and to constantly update themselves on legislative developments, also by taking advantage of the training opportunities offered by PLASTIMARK - S.P.A.

The Company considers transparency in financial statements and accounting a fundamental principle for the conduct of its business and for the protection of its reputation.

### Fairness

Fairness and moral integrity are an unfailing duty for all Recipients.

The Recipients are bound not to establish any privileged relationship with third parties that is the result of external solicitations aimed at obtaining improper advantages.

In the performance of their activities, the Recipients are bound not to accept donations, favours or benefits of any kind (except for objects of modest value) and, in general, not to accept any consideration for the purpose of granting advantages to third parties in an improper manner.

In turn, the Recipients must not make donations of money or goods to third parties or in any case offer unlawful benefits or favours of any kind (except for objects of modest value or commercial courtesy gifts authorised by the Company) in connection with the activity they perform for the benefit of PLASTIMARK S.P.A.

The intrinsic conviction of acting in the interest of the Company does not exonerate the Recipients from the obligation to duly observe the rules and principles of this Code.

### Non-discrimination

In relations with Stakeholders and in particular in the selection and management of personnel, work organisation, choice, selection and management of suppliers, as well as in relations with Entities and Institutions, PLASTIMARK S.P.A. avoids and repudiates any discrimination concerning age, sex, race, sexual orientation, state of health, political and trade union opinions, religion, culture and nationality of its interlocutors.

PLASTIMARK S.P.A., at the same time, fosters integration, promoting intercultural dialogue, the protection of the rights of minorities and the weak.

### Confidentiality

PLASTIMARK S.P.A. is committed to ensuring the protection and confidentiality of the personal data of Recipients and Stakeholders, in compliance with all applicable data protection regulations.

The Recipients are required not to use confidential information, learned in the course of their work, for purposes unconnected with the performance of such activity, and in any case to always act in compliance with the confidentiality obligations assumed by PLASTIMARK S.P.A. towards all Stakeholders.

In particular, the Recipients are bound by the strictest confidentiality on documents disclosing know-how, transport information, business information and corporate transactions.

### Diligence

The relationship between PLASTIMARK S.P.A. and its employees is based on mutual trust: employees are, therefore, required to work to further the interests of the company, in compliance with the values set out in this Code.

The Recipients must abstain from any activity that may conflict with the interests of PLASTIMARK S.P.A., renouncing the pursuit of personal interests that conflict with the legitimate interests of the Company.

In cases where the possibility of the existence of a conflict of interest may arise, Recipients are required to refer, without delay, to their hierarchical superior so that the company may assess, and possibly authorise, the activity potentially in conflict.

In cases of violation, the Company will take all appropriate measures to put an end to the conflict of interest, reserving the right to act on its own protection.

## Loyalty

PLASTIMARK S.P.A. and the Recipients undertake to achieve fair competition, in compliance with national and EU regulations, in the awareness that virtuous competition is a healthy incentive for innovation and development processes, and also protects the interests of consumers and the community.

## RELATIONS WITH EMPLOYEES AND COLLABORATORS

### Personnel selection

Personnel assessment and selection are carried out according to fairness and transparency, respecting equal opportunities in order to match PLASTIMARK - S.P.A.'s needs with the professional profiles, ambitions and expectations of the candidates.

PLASTIMARK S.P.A. undertakes to adopt all useful measures to avoid any form of favouritism in the personnel selection process by using objective and meritocratic criteria, respecting the dignity of the candidates as well as in the interest of the good performance of the company.

The personnel recruited, also through the implementation of this Code, receive clear and correct information about their roles, responsibilities, rights and duties.

### Personnel management

PLASTIMARK S.P.A. protects and enhances its human resources, striving to maintain constant the conditions necessary for the professional growth, knowledge and skills of each person, carrying out appropriate training for professional updating and any initiative aimed at pursuing this purpose.

PLASTIMARK S.P.A. promotes the participation of workers in the life of the company, providing participatory tools capable of gathering the opinion and suggestions of workers, guaranteeing their widest participation.

Without prejudice to the utmost helpfulness towards the Company, no worker may be obliged to perform tasks, services or favours that are not due according to his or her contract of employment and role within the company.

The Company is firmly committed to combating episodes of mobbing, stalking, psychological violence and any behaviour that is discriminatory or damaging to the dignity of the individual inside and outside company premises.

Relations between employees must be conducted with loyalty, fairness and mutual respect, in observance of the values of civil coexistence and personal freedom.

## WORKING ENVIRONMENT

PLASTIMARK S.P.A. is committed to offering its staff a healthy, safe and dignified working environment.

Safety in the workplace is ensured both by strictly implementing the provisions of the law in force and by actively promoting a safety culture through specific training programmes. Staff training is a central element of the management system adopted.

PLASTIMARK S.P.A. protects the health of its workers and also ensures compliance with hygiene and health prevention regulations.

## BUSINESS MANAGEMENT

### Compliance with internal procedures

PLASTIMARK S.P.A. believes that management efficiency and a control culture are indispensable elements for the achievement of objectives.

Recipients are required to strictly observe the company's internal procedures and instructions.

Recipients must act in accordance with their authorisation profiles and must keep all appropriate documentation to keep track of actions taken on behalf of the company.

### Accounting management

In their accounting management activities, the Recipients are required to act in compliance with the principles of truthfulness, accuracy and transparency, so that the reputation of PLASTIMARK S.P.A. is protected both internally and externally.

Compliance with these principles also allows the company to plan its operational strategies according to its real economic and asset situation.

All entries in the accounts must therefore be supported by complete, clear and valid documentation, avoiding any form of omission, falsification and/or irregularity.

In the case of balance sheet or profit and loss items based on valuations and estimates, the recording thereof must be based on the criteria of reasonableness and prudence.

### Asset protection

Recipients exercise their functions by seeking to rationalise and contain the use of company resources.

Recipients are obliged to correctly apply security provisions in order to protect hardware devices from unauthorised access, which could seriously infringe the personal data protection rights of PLASTIMARK S.P.A. personnel and customers.

#### Communication

PLASTIMARK S.P.A. shall provide Stakeholders with suitable communication tools through which they can interact with the company to forward requests, ask for clarifications or make complaints.

PLASTIMARK S.P.A. promotes effective corporate communication capable of putting the company in contact with civil society, in order to take on board instances, needs and requirements of the community and to disseminate its values and mission.

Information disseminated to Stakeholders shall be complete and accurate in order to enable recipients to make correct and informed decisions.

PLASTIMARK - S.P.A.'s advertising promotion respects ethical values, protecting minors and repudiating vulgar or offensive messages.



## EXTERNAL RELATIONS

### Relations with Authorities and Public Administrations

Relations with the Authorities and the Public Administration must be characterised by the utmost clarity, transparency and cooperation, in full compliance with the law and according to the highest moral and professional standards.

The Recipients, unless expressly authorised, may not relate in the name of and on behalf of PLASTIMARK S.P.A. with the Authorities and the Public Administration.

In relations with Public Officials, Public Service Officers, and the Public Administration in general, the authorised Recipients shall adhere to the highest levels of fairness and integrity, refraining from any form of pressure, explicit or veiled, aimed at obtaining any undue advantage for themselves or for PLASTIMARK S.P.A.

In this regard, the authorised Recipients shall strictly comply with the provisions of this Code and, more generally, with the directives issued by the management of PLASTIMARK S.P.A.

### Relations with political and trade union organisations

PLASTIMARK S.P.A. does not favour or discriminate against any political organisation or trade union.

The Company refrains from making any undue contribution in any form whatsoever to parties, trade unions or other social formations, except for specific derogations and in any case always within the limits of what is permitted by the laws in force.

The Recipients are required to refrain from any direct, indirect or boastful pressure on political or trade union representatives.

### Relations with customers and suppliers

The Recipients shall deal with third parties with courtesy, competence and professionalism, in the conviction that the protection of the company's image and reputation, and consequently the achievement of the company's objectives, depends on their conduct.

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

Recipients are expected to make constant efforts to offer punctual and high-quality services to customers, seeking to limit any form of disservice or delay in order to maximise customer satisfaction.

Relations with suppliers are characterised by fairness, correctness and transparency.

Suppliers are chosen on the basis of objective criteria of cost-effectiveness, expediency and efficiency.

The choice of suppliers on purely subjective and personal grounds or, in any case, on the basis of conflicting interests is precluded.

The Recipients must put in place every possible control so that suppliers and customers are also able to comply with the fundamental ethical principles set out in this Code.

## INTERNAL CONTROL SYSTEM

Compliance with the provisions of this Code is entrusted to the prudent, reasonable and careful supervision of each of the Recipients, within the scope of their respective roles and functions within the company.

All Recipients are urged to report to their direct superiors facts and circumstances potentially in conflict with the principles and prescriptions of this Code.

The management of PLASTIMARK S.P.A. and the bodies appointed for this purpose shall take all necessary measures to put an end to violations, being able to resort to any disciplinary measure in compliance with the law and the rights of workers, including trade union rights.

## GUIDELINES OF THE SANCTIONS SYSTEM

The internal control system is geared towards the adoption of tools and methodologies to counter potential business risks, in order to ensure compliance not only with the law, but also with internal provisions and procedures.

In fact, the violation of the principles laid down in the Code and in the procedures indicated in the internal controls compromises the relationship of trust between the Company and its directors, employees, consultants, collaborators in various capacities, customers, suppliers, commercial and financial partners.

Such violations shall therefore be immediately prosecuted by PLASTIMARK S.P.A. in an incisive and timely manner through the adoption of appropriate and proportionate disciplinary measures.

The effects of violations of the Code of Ethics and internal protocols must be taken into account by all those who, in any capacity, have relations with PLASTIMARK S.P.A. Depending on the seriousness of the conduct of the person involved in one of the unlawful activities envisaged by the Code, PLASTIMARK S.P.A. shall take the appropriate measures without delay, irrespective of any criminal prosecution by the judicial authorities.

Without prejudice to the foregoing, conduct in breach of the Code of Ethics constitutes:

a serious breach for employees (blue-collar workers, white-collar workers, middle managers and executives), with the sanctions, applied depending on the seriousness, provided for by the CCNL (National Collective Labour Agreements) for the category (verbal reprimand, written reprimand, fine not exceeding three hours' pay, suspension from work and from pay up to a maximum of three working days, dismissal for just cause or justified reason); if criminal proceedings are pending or if a measure restricting personal liberty is taken against the employee, before adopting the disciplinary measure, the sanction of suspension from work and pay may be adopted, for the duration corresponding to the outcome of the criminal proceedings or until the end of the measure restricting personal liberty;

just cause for revocation of the directors' mandate;

cause for immediate termination of the relationship, in the most serious cases, for external collaborators and para-subordinates;

cause for immediate termination of the relationship, in the most serious cases, for suppliers, contractors and subcontractors.

The identification and application of sanctions will always take into account the general principles of proportionality and appropriateness with respect to the alleged violation.

In all the aforementioned hypotheses, PLASTIMARK S.P.A. also reserves the right to exercise all the actions it deems appropriate for the compensation of damages suffered as a result of conduct in breach of the Code of Ethics.



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