



GIORDANO POULTRY PLAST SpA

**Organisation and management model in accordance with
Legislative Decree No. 231/2001
Code of Ethics**

Approved: December 2021

1. CODE OF ETHICS

This Code of Ethics has been approved by the Board of Directors of GIORDANO POULTRY PLAST SpA.

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FOREWORD

VISION AND MISSION OF GIORDANO POULTRY PLAST SpA

GIORDANO POULTRY PLAST SpA is aware that the prestige of a company is recognised, not only by the competence of its collaborators and by the high quality of the service provided to the clientele, 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 and Conduct in the conviction that reliability is built day by day by complying with the rules and valuing the people.

This Code of Ethics accordingly represents a distinctive and identifying element vis-à-vis the market and third parties, whose knowledge and sharing, required of all those who work in the Company or collaborate with it, are the foundation of our activity and the first step to contribute to the pursuit of our Mission.

GIORDANO POULTRY PLAST SpA's objective is thus to pursue excellence in the market in which it operates, by means of a Sustainable Development, safeguarding the Environment and Safety of the people involved via the consistency of a conduct respectful of Social Ethics, obtain the satisfaction and ensure added value for the Employee, for the Customer and, in general, for the Community.

PURPOSES AND RECIPIENTS

This Code of Ethics (hereinafter, the "**Code**") illustrates the set of ethical and moral principles underlying the activity of GIORDANO POULTRY PLAST SpA (hereinafter, also the "**Company**"), as well as the lines of conduct adopted by the Company both within its activity (in the relationships between employed staff) and outside (in the relationships with institutions, suppliers, customers, commercial partners, political and trade union organisations as well as the media (hereinafter, the "**Stakeholders**").

Compliance with said principles is essential for accomplishing the company Mission of GIORDANO POULTRY PLAST SpA and ensuring its reputation within the socio-economic context in which it operates.

Preliminarily, we wish to highlight that GIORDANO POULTRY PLAST SpA strongly believes that every activity must be performed ethically, finding itself reflected in the principle sanctioned by Article 41 of the Italian Constitution, pursuant to which private economic initiative "*may not be undertaken in conflict with social usefulness or in such a manner as to cause harm to safety, freedom and human dignity.*"

This Code is binding on the Managers and Employees of GIORDANO POULTRY PLAST SpA, as well as on all those who operate and collaborate, on an indefinite duration or fixed-term basis, on behalf of the Company (hereinafter, the "**Recipients**").

The Code will be widely disseminated within the scope of the internal governance structure, and extensively communicated to the outside world, including through the company's own Internet website.

GIORDANO POULTRY PLAST SpA further undertakes to adopt any additional provision to ensure that the principles and prescriptions of the Code be promptly disclosed and applied.

GENERAL PRINCIPLES

The conduct of Recipients, at all company levels, is founded on the principles of legality, correctness, non-discrimination, confidentiality, diligence, and loyalty.

Legality

GIORDANO POULTRY PLAST SpA operates in total compliance with the law and with this Code.

All Recipients are accordingly bound to abide by any applicable rule and constantly keep abreast with legislative evolutions, also by making use of the training opportunities offered by GIORDANO POULTRY PLAST SpA.

The Company considers the transparency of financial statements and accounting an essential principle for the exercise of its activity and the protection of its reputation.

Correctness

Correctness and moral integrity are an unflinching duty for all Recipients.

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

In carrying out their activity, Recipients are required not to accept donations, favours or utilities of any kind (except for objects of modest value), and, in general, not to accept any quid pro quo with a view to granting improper advantages to third parties.

In turn, Recipients must not make donations in money or goods to third parties or in any event offer unlawful benefits or favours of any kind (save for objects of modest value or commercial courtesy gifts authorised by the Company) in connection with the activity performed by them on behalf of GIORDANO POULTRY PLAST SpA.

The intrinsic conviction to act in the Company's interest does not exempt Recipients from the obligation to promptly comply with the rules and principles of this Code.

Non-Discrimination

In the relationships with Stakeholders, and especially in staff selection and management, work organisation, choice, selection and management of suppliers, as well as in the relationships with Bodies and Institutions, GIORDANO POULTRY PLAST SpA avoids and repudiates any discrimination relating to age, sex, race, sexual orientations, state of health, political and trade union opinions, religion, culture and nationality of its interlocutors.

GIORDANO POULTRY PLAST SpA, simultaneously facilitates integration, by promoting intercultural dialogue and the protection of rights of minorities and weak subjects.

Confidentiality

GIORDANO POULTRY PLAST SpA undertakes to ensure the protection and confidentiality of the personal data of Recipients and Stakeholders, in compliance with any applicable law in the field of personal data protection.

Recipients are bound not to use confidential information, learnt by virtue of their work activity, for purposes unrelated to the exercise of such activity, and in any event to constantly act in compliance with the confidentiality obligations incurred by GIORDANO POULTRY PLAST SpA vis-à-vis all Stakeholders.

In particular, Recipients are bound to utmost confidentiality on documents capable of revealing know-how, transport information, commercial information and company transactions.

Diligence

The relationship between GIORDANO POULTRY PLAST SpA and its Employees is founded on reciprocal trust: the employees are accordingly required to operate in order to facilitate the interests of the company consistently with the values set out in this Code.

Recipients must abstain from any activity that might be deemed in conflict with the interests of GIORDANO POULTRY PLAST SpA, by waiving the pursuit of personal interests in conflict with the legitimate interests of the Company.

In those instances where the existence of a conflict of interests is conceivable, Recipients are bound to contact, without any delay, their own hierarchical superior to enable the company to assess, and if need be authorise, the activity potentially in conflict of interests.

In the event of breaches, the Company will adopt any measure capable of putting an end to the conflict of interests, reserving the right to act for its own protection.

Loyalty

GIORDANO POULTRY PLAST SpA and Recipients undertake to implement a loyal competition, in compliance with national and EU legislation, aware that a virtuous competition represents a healthy incentive to the processes of innovation and development, and furthermore protects the interests of consumers and the community.

RELATIONSHIPS WITH EMPLOYEES AND COLLABORATORS

Staff selection

Staff appraisal and selection are carried out in accordance with correctness and transparency, in compliance with equal opportunities in order to combine the needs of GIORDANO POULTRY PLAST SpA with the professional profiles, ambitions and expectations of candidates.

GIORDANO POULTRY PLAST SpA undertakes to adopt any measure serving to avoid any form of favouritism in the staff selection process by using objective and meritocratic criteria, in compliance with the dignity of Candidates as well as in the interest of the Company and for the sake of its successful performance.

Staff hired, including through implementation of this Code, receives a clear and correct information about roles, responsibilities, rights and duties of parties.

Staff management

GIORDANO POULTRY PLAST SpA protects and enhances its human resources, undertaking to constantly maintain the conditions necessary for the professional growth, knowledge and skills of each person, carrying out the appropriate training for professional refreshment and any initiative aimed at pursuing such purpose.

GIORDANO POULTRY PLAST SpA promotes workers' participation in the company's life, providing participatory tools capable of gathering workers' opinion and suggestions, thereby ensuring their widest participation.

Without prejudice to the utmost availability towards the Company, no worker may be obliged to perform duties, services or favours that are not due according to one's employment contract and one's role within the company.

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

Relationships between employees must be entertained with loyalty, correctness and mutual respect, in compliance with the values of civil coexistence and people's freedom.

WORKPLACE

GIORDANO POULTRY PLAST SpA undertakes to offer to its staff a healthy and safe workplace respectful of workers' dignity.

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

GIORDANO POULTRY PLAST SpA protects the health of its workers, also by ensuring compliance with hygienic and health prevention rules.

BUSINESS MANAGEMENT

Compliance with internal procedures

GIORDANO POULTRY PLAST SpA believes that managerial efficiency and the culture of control are essential elements for the accomplishment of objectives.

Recipients are bound to strictly comply with the Company's internal procedures and instructions.

Recipients must act based on the respective profiles of authorisation and must retain all documentation capable of keeping track of the actions undertaken on behalf of the Company.

Accounts management

In the accounts management activity, Recipients are called upon to act in compliance with the principles of truthfulness, accuracy and transparency, so that the reputation of GIORDANO POULTRY PLAST SpA can be protected both internally and externally.

Compliance with said principles furthermore allows the Company to plan its own operational strategies based on its real economic and equity situation.

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

In the event of equity or economic elements founded on valuations and estimates, the relevant registration must be inspired by criteria of reasonableness and prudence.

Asset protection

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

Recipients are bound to correctly apply safety provisions in order to protect hardware devices from unauthorised accesses that might seriously impair the rights to the protection of personal data of staff and customers of GIORDANO POULTRY PLAST SpA.

Communication

GIORDANO POULTRY PLAST SpA makes available to the Stakeholders suitable communication tools by which they can interact with the Company to forward requests, ask for clarifications or lodge complaints.

GIORDANO POULTRY PLAST SpA promotes an effective company communication capable of linking it to Civic Society, view a view to receiving requests, needs and requirements of the Community and divulging its own Values and Mission.

The information disclosed to Stakeholders is complete and accurate to enable Recipients to adopt correct and conscious decisions.

GIORDANO POULTRY PLAST SpA's advertising promotion respects ethical values, protecting minors and repudiating vulgar or offensive messages.

RELATIONSHIPS WITH THE OUTSIDE

Relationships with Authorities and Public Administrations

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

Recipients, unless expressly authorised, may not liaise in the name and on behalf of GIORDANO POULTRY PLAST SpA with the Authorities and Public Administration.

In the relationships with Public Officials, Public Service Officers and the Public Administration in general, authorised Recipients shall abide by utmost levels of correctness and integrity, abstaining from any form of pressure, explicit or veiled, aimed at obtaining any undue advantage for themselves or for GIORDANO POULTRY PLAST SpA.

To that end, authorised Recipients shall be bound to strictly comply with the provisions of this Code, as well as, more generally, with the provisions of the directives issued by the management of GIORDANO POULTRY PLAST SpA.

Relationships with political and trade union organisations

GIORDANO POULTRY PLAST SpA does not favour or discriminates any political or trade union organisation.

The Company abstains from providing any undue contribution under any form to parties, trade unions or other social aggregates, save for specific exemptions and in any event always within the limits of what is permitted by current regulations.

Recipients are bound to abstain from direct, indirect or boasted pressure on political exponents or trade union representatives.

Relationship with customers

GIORDANO POULTRY PLAST SpA considers anyone who purchases its products and services as its own customer. The same guarantees equal treatment to both its current and potential customers, without any discrimination between them without verified and objective reasons.

Recipients interact with third parties in a courteous, competent and professional manner, in the conviction that the company's image and reputation and, consequently, the attainment of company objectives, depend on their conduct.

In particular, Recipients must refrain from any form of unfair or misleading behaviour that might induce Customers to rely on unfounded facts or circumstances.

Recipients must commit themselves to constantly offer punctual and high-quality services to Customers, seeking to limit any form of disservice or delay in order to maximise customer satisfaction, in compliance with the general

principles of this Code, human rights, integrity in personal relationships, protection of intellectual property and respect for competitors.

Customer satisfaction is considered a primary company resource. That is why procedures are deployed to check the degree of customer satisfaction, so as to continuously improve the level of commercial offer.

GIORDANO POULTRY PLAST SpA constantly pursues the innovation of its products and services. For this reason, too, it pays utmost attention to market evolutions, aiming to anticipate its tendencies and devoting resources to the research and development of new products and solutions.

The Company warrants the safety of products it places on the market, through scrupulous compliance with all legal, regulatory and technical rules from time to time applicable, as well as by deploying adequate procedures to control production and quality standards.

All communications addressed at the market and at customers are correct, loyal and checked beforehand. GIORDANO POULTRY PLAST SpA refrains from any misleading or unfair mercantile practice.

Relationship with suppliers

Relationships with suppliers are founded on loyalty, correctness and transparency.

The choice of suppliers is based on objective criteria of cost-effectiveness, opportunity and efficiency.

The choice of suppliers on purely subjective and personal grounds or, in any event, pursuant to interests in conflict with those of the Company, is precluded.

Recipients must deploy any possible control to ensure that suppliers, too, are capable of complying with the essential ethical principles inspiring this Code.

INTERNAL CONTROL SYSTEM

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

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

The management of GIORDANO POULTRY PLAST SpA and the bodies set up for this purpose adopt all necessary measures to put an end to infringements, being able to resort to any disciplinary measure in compliance with the law and with workers' rights, inclusive of trade union rights.

GUIDELINES OF THE PENALTY SYSTEM

The internal control system is oriented towards the adoption of tools and methodologies aimed at combating potential corporate risks, in order to ensure compliance not just with the laws, but also with internal provisions and procedures.

Breach of the principles set in the Code and in the procedures indicated in internal controls does in fact undermine the fiduciary relationship between the Company and its own Managers, Employees, Consultants, Collaborators on various grounds, Customers, Suppliers, commercial and financial Partners.

Such breaches shall be tackled by GIORDANO POULTRY PLAST SpA at once in an incisive and timely manner, through the adoption of adequate and proportional measures, of a disciplinary nature as well.

The effects of breaches of the Code of Ethics and of the internal protocols must be taken into consideration by all those who, on any ground, entertain relationships with GIORDANO POULTRY PLAST SpA. Depending on the seriousness of the conduct engaged in by the subject involved in one of the unlawful activities dealt with by the Code, GIORDANO POULTRY PLAST SpA shall immediately adopt suitable measures, regardless of the possible exercise of criminal action by the Judicial Authority.

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

either serious non-compliance for Employees (Workers, Salaried Employees, Supervisors and Managers), with penalties applied depending on the seriousness, as laid down by the national agreement for the category (verbal reprimand, written warning, fine not exceeding three hours of remuneration, suspension from work and remuneration up to a maximum of three business days, dismissal for just cause or justified reason); in the event of pending criminal action or execution of a measure restricting personal freedom adopted against the employee, before adopting the disciplinary measure the penalty of suspension from service and from remuneration may be applied for the duration corresponding to the outcome of the criminal action or until the end of the measure restricting personal freedom;

or just cause for revocation of the mandate from Managers;

or cause for immediate termination of the relationship, in the most serious cases, for External Collaborators and Insourcing Workers;

or cause for immediate termination of the relationship, in the most serious cases, for Suppliers, Contractors and Subcontractors.

The identification and application of penalties will always pay regard to the general principles of proportionality and adequacy compared to the disputed breach.

In all the aforementioned scenarios, GIORDANO POULTRY PLAST SpA likewise reserves the right to exercise whatever actions it might deem fit to compensate for the damage suffered as a result of the conduct in breach of the Code of Ethics.