

## COMPANY CODE OF CONDUCT

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## 1. PLAST GROUP STANDARD ON WORKING CONDITIONS

**This Standard lists down the minimum requirements concerning the environmental and working conditions of PLAST GROUP and of its suppliers of raw materials (both direct and indirect), final products and services.**

### ***PLAST GROUP regulations declaration***

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*Plast Group is focused on maintaining a key role in the plastic injection field, mainly by safeguarding the employees and the working environment. The Company is committed on manufacturing innovative and eco-friendly products and solutions while preserving the safety and health of its employees, two main values Plast Group safeguards in all its activities.*

*The civic and environmental commitment of Plast Group applies to activities and processes so as to safeguarding the environment and the human rights of the ILO's Declaration on Fundamental Principles and Rights at Work and the International Bill of Human Rights. Over the years, the Company has focused on environmental sustainability and research on decreasing energy consumption, so as to continuously improving the process and technology.*

*The Code of Conduct, hereafter referred to as the "Code", plays a key role in providing employees with guidelines and suggestions to behave ethically.*

### **Information on the Standard**

The Code of Conduct, hereafter referred to as the "Code", is an important instrument for Plast Group to provide rules and suggestions for employees to behave ethically.

The Standard is composed of more sections, in compliance with the Code's regulations. Each section contains the Code's regulation and its related definitions and requirements to fulfil. The Standard also includes the "Best practices of management". All parties are encouraged to consider these regulations while performing their activities.

The Standard is to be revised and updated on a regular basis, to reflect the ongoing evolution of our experience and technologies.

## 2. APPLICABILITY

The Code applies to all Plast Group's plants to all levels of occupation, without exception to the Management, Trade Unions, employees and company's counsellors. Any third party acting on behalf of the Company is also subject to the Code.

Plast Group's sites can introduce and apply any more rigorous version of the Standard they may require.

The Code of a supplier can replace PLAST GROUP Code, as long as it preserves PLAST GROUP Code and Standard in all their parts.

## **2.1 Responsibility**

The Management must assure the implementation of the Code's guidelines to guarantee an ethical and healthy environment for the correct operating methods.

Employees must fully respect the Code of Conduct and report any violation of it. There will be no retaliation or any other negative consequences against employees reporting such violations.

In the event of a violation by one or more employees or managers, corrective actions may apply depending on the type of violation.

## **2.2 Regulations and Guidelines**

Every plant must act in compliance with the applicable relevant laws established by the local authorities.

## **2.3 Suppliers**

All Suppliers of Plast Group must follow the regulations of the Code. Moreover, Suppliers must certify for the provision of raw materials and components coming from reliable sources that does not violate directly or indirectly any human rights.

### *Company's Ethics*

- Suppliers must maintain the integrity, transparency and precision of all documents concerning their activities with PLAST GROUP.
- Suppliers shall not attempt to unduly influence a PLAST GROUP affiliate, agent or representative, or to maintain relationships that could create a conflict of interest for the representative.
- If suppliers have access to confidential (non-public) information of PLAST GROUP, they must certify not to share such information.

### *Minerals from conflict areas*

- Suppliers shall ensure that the procurement of minerals from conflict areas in the form of products, parts and components supplied to PLAST GROUP does not contribute, directly or indirectly, to the financing or benefit of human rights abusers in conflict or high-risk areas.
- Suppliers shall have consistent policies and management systems in place to comply with the OECD Guideline for a responsible supply chain of minerals from conflict and high-risk areas.

## 2.4 Corruption and moral code

Plast Group opposes any kind of unethical corruption, bribery or business procedure.

## 2.5 Child labour

Plast Group does not tolerate any form of child labour. No person aged under 16 or not having completed compulsory education can be employed in the Company. In the event of authorised minor working, the Management will assure proper wage and working conditions, in compliance with the Italian law.

### Best Practices of Management

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- *The Plant must contact legal guardians (usually parents) before employing authorised minors.*
- *The Plant must maintain a list of authorised minors who are subject to working time and job restrictions due to their age.*
- *In the event of night shift, the Plant shall ensure the safe transfer of authorised minors and the possibility for them to rest under appropriate conditions.*
- *In countries where there is a risk of child labour, documented procedures for dealing with such cases are recommended. These procedures should ensure an immediate solution, including the removal of the child from the workplace and, at the same time, the implementation of a sustainable solution, so as to safeguard the child's growth.*

## 2.6 Forced labour

The Company opposes any form of involuntary or forced labour and any type of labour that does not respect the will of the individual.

Forced and involuntary labour is in no way tolerated in any form whatsoever. This includes bonded, slave and unauthorised prison work, as well as other forms of work that do not respect the will or free choice of the individual.

## 2.7 Working time

The Company cannot force employees to cover a total amount of working hours exceeding 48 hours per week, including the average overtime on a reference period of less than 4 months.

## 2.8 Remuneration

Wages, including overtime and benefits, must equal or exceed the minimum amount requirements set up in the national collective agreement.

## **2.9 Health and Safety of Employees**

Plast Group is committed on assuring a safe and healthy work environment. Each group's plant will implement the most effective and relevant measures aimed at safeguarding employees' safety, including procedures to avoid incidents and occupational diseases. Each plant will also introduce safety measures in line with local and national laws.

## **2.10 Discrimination and harassment**

The Company respects and preserves the cultural diversities and differences of the employees. Employees will only be considered according to their skills and professional qualifications, without any discrimination of religion, race, sex or sexual inclination. Any physical or psychological abuse or harassment against one or more employees will not be tolerated.

## **2.11 Disciplinary actions**

Plast Group condemns any form of physical punishment as corrective action on the employees. The Company must ensure an ethical and fair treatment to all employees. If one employee violates one or more prescriptions of the Code, penalties will apply in compliance with the job agreement.

## **2.12 Freedom of association**

All employees are free to organise into associations. Each employee has the right to decide whether to join or abstain from joining any association of worker rights, without being subject to intimidation.

## **2.13 Environmental issues management**

Plast Group's plants are committed to implement and follow the relevant national law on environmental safeguard. Moreover, the Company will introduce energy management and saving systems in accordance with the local and national rules and with process needs of each plant. In particular, Plast Group is committed to reduce the environmental impact of the production process, by cutting energy consumption and improving energy and water sources, including an in-depth assessment before purchasing and implementing new process procedures, machines and equipment.

The *Environmental Manager* has the responsibility and the authority to manage and coordinate environmental issues within the plant, including the implementation and updating of the environmental legislation, guideline and requirements defined in this document.

## **2.14 Fire prevention**

Each unit must identify and comply with all applicable legal provisions regarding fire protection, including inspections by the authorities.

Each plant shall maintain a record of fires and serious incidents which could have potentially caused a fire, including the corrective and preventive measures applied.

### **3. MONITORING**

In order to ensure the effective application of the Code, Plast Group is committed to a constant monitoring and updating of these provisions, in accordance with local and national legislations and depending on the main changes in the legislation on work, safety and the environment.

All actors that contribute to the company's growth (management, employees and external collaborators) must participate in achieving improvement targets by cooperating and ensuring the implementation of this Code of Conduct.

PLAST GROUP Board of Directors, in compliance with its management and control functions, identifies a suitable control system to ensure the application of the present provisions and of the Company's regulatory compliance programme within the organisational structure and/or with the support of independent bodies, including external bodies.

The team in charge of such monitoring activities shall report, whenever they deem it appropriate, to the Board of Directors on the activities carried out and on the circumstances and significant facts of their office or on any urgent critical issues of this Code that emerged during the verification activity.

#### **3.1 Reports**

PLAST GROUP employees are required to report to their Plant Manager any alleged or confirmed breach of this Code and/or internal and/or external regulations, ethical principles or any Anti-Corruption Law by the Company, a colleague, a collaborator or a third party, including requests or offers for undue payments received from them.

Should an employee not report a known or suspected illegal action of which he or she is aware, he or she may be subject to disciplinary action.

The Company ensures that no employee shall suffer retaliation, discrimination or disciplinary sanctions, as well as unfavourable consequences for refusing to adopt a conduct that violates the Code, even if this may result in a loss of business activities for PLAST GROUP or have a negative impact on its programs.

Business Partners and Customers of PLAST GROUP are required to report to the Plant Manager or to the Company Management any alleged or confirmed violation either of the Code or of ethical principles or any Anti-Corruption Law by the Company.

Reports can be sent by e-mail or written notice to the Plant Manager. This procedure can guarantee anonymity and PLAST GROUP is committed to the utmost confidentiality in communication, in accordance with legal obligations.

#### 4. REFERENCES AND OTHER INSTRUCTIONS

The OECD Guidelines for Multinational Enterprises

ISO 14001

ISO 26000

BS OHSAS 18001 – ISO45001

SA8000 International Bill of Human Rights

UN Global Compact

UN Guiding Principles on Business and Human Rights

Children's Rights and Business Principles

ILO Declaration on Fundamental Principles and Rights at Work ILO conventions:

C1, Hours of Work (Industry) Convention, limiting the working hours in industrial companies to 8 per day and 48 per week, 1919

C29, Forced Labour Convention, 1930

C87, Freedom of Association and Protection of the Right to Organise Convention, 1948

C98, Right to Organise and Collective Bargaining Convention, 1949

C100, Equal Remuneration Convention, 1951

C105, Abolition of Forced Labour Convention, 1957

C111, Discrimination (Employment and Occupation) Convention, 1958

C131, Minimum Wage Fixing Convention, 1970

C138, Minimum Age Convention, 1973

C182, Worst Forms of Child Labour Convention, 1999