



The Spirit and the Letter

Code of Ethics

"The behaviour of those who
acts in such a way as to treat humanity,
both in their own person and in
that of every other person,
always together as an end,
not simply as a means
to achieve an end."

(I. Kant)

PREMISE

With this *Code*, the Management of ***Fiorini International Italia spa*** intends to clearly reaffirm the ethical principles that inspire it and to which all Employees and external Collaborators are required to adhere, in the performance of their duties and roles and in their individual conduct.

Each employee is required to be familiar with and implement the *Code*, as well as to report any shortcomings and/or violations.

The Chairman
Luigi Fiorini

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1. FIORINI INTERNATIONAL ITALIA S.P.A. and ITS MISSION

The company was founded in 1947 with the production of paper packaging for basic necessities. Following the evolution of consumer habits, the first diversification took place in the 1980s with the introduction of shopping bags for the commercial sector and later for the fashion industry.

Today, Fiorini International Italia S.p.A. plays a key role in image communication, interpreting the needs and symbols of major food industry groups (salt, sugar, flour, etc.) and leading international brands.

Fiorini International Italia spa carries out its activities at its plants in Trecastelli (AN) and Mondolfo (PU).

Fiorini International Italia spa controls Fiorini International Czech Republic s.r.o., which has adopted and adapted this document to local regulations by resolution of its administrative body.

Hereinafter, the two companies will also be referred to as "Fiorini".

MISSION

The centrality of "Customer Service" in accordance with the roles, strategic importance and value of the human resources operating within the company represent the founding values around which the entire "business system" revolves in order to achieve its objectives.

In particular:

Quality of the product and services offered: through continuous technological updating, research and innovation in both plant engineering and raw materials.

Ecological awareness and sustainability: a strong focus on the "environmental resource" through the use, where possible, of non-polluting materials and components and sustainable procedures, because it is possible to "do business" while respecting the environment.

Customer focus: through planning the offer in partnership with its customers, presenting itself as a problem solver and service provider, rather than solely a 'product supplier'.

Respect for people and organisational and social rules: people are always considered a core value and a vital source of wealth and development opportunities. To this end, human resources are guided and trained to increasingly strengthen the most important element of the 'system'. Similarly, every person at Fiorini is called upon to behave ethically and morally in accordance with the principles and norms of civilised living.

Balance with the social context: harmonious growth with the territory in which Fiorini operates and from which it draws resources to work and carry out its business is of fundamental importance, redistributing attention and support with the wealth created.

Efficiency and profitability: profit is important not only as an indicator of the company's good performance but also as a vital and social value capable of ensuring prosperity, collective development and, above all, the future.

This Code came into force in March 2013 and was presented and distributed to all **Fiorini International Italia** employees.

The Code of Ethics is an integral part of the Organisation and Control Model adopted by Fiorini International Italia S.p.A. and represents the basis on which the preventive control system is founded for the purposes of Legislative Decree No. 231 of 8 June 2001 (hereinafter also referred to as '**Legislative Decree 231/01**' or '**Decree 231**').

From the same date, it is presented to new hires and interns upon signing their employment contract or internship agreement and is distributed to everyone whenever it is subject to changes and additions.

Fiorini International Italia undertakes to monitor compliance with the provisions of the Code by all its Employees and Collaborators working on its behalf.

The Code in force, in the event of any future amendments and/or additions, will indicate a new revision index.

2. SCOPE OF APPLICATION AND RECIPIENTS

The set of rules of conduct contained in this Code of Ethics of **Fiorini International Italia** must inspire the activities of all those who work, internally or externally, within the sphere of action of **Fiorini International Italia**.

The following persons (hereinafter collectively referred to as 'Recipients') are required to comply with the Code of Ethics:

- shareholders, in the exercise of their rights related to their shareholding or membership;
- the administrative body, which is guided by the principles of the Code of Ethics in setting business objectives;
- members of the supervisory body, who ensure compliance with and observance of the contents of the Code of Ethics in the exercise of their functions;
- the heads of departments, who give substance to the values and principles contained in the Code of Ethics, taking responsibility both internally and externally and strengthening trust, cohesion and the spirit of the company;
- employees in general, who, in due compliance with the law and regulations in force, adapt their actions and behaviour to the principles, objectives and commitments set out in the Code of Ethics;
- all those who work to achieve the aims and objectives of **Fiorini International Italia** and, in general, all those who work in the name and/or on behalf of **Fiorini International Italia** and who have contractual relationships with it.

All Recipients are required to observe and, to the extent of their competence, to enforce the principles contained in the Code of Ethics. In particular, the administrative body and management have a duty to set an example of consistency between the principles of the Code of Ethics and everyday behaviour.

Under no circumstances does the pursuit of **Fiorini International Italia's** interests justify the adoption of conduct that conflicts with that set out herein.

Fiorini International Italia undertakes to promote awareness of this Code of Ethics and to ensure timely communication and training by:

- distribution to all members of the corporate bodies;
 - distribution to all employees, attaching the Code of Ethics to the employment contract;
 - distribution to third parties, attaching the Code of Ethics to the relevant contract;
 - display in a place accessible to all;
 - making it available on the internal portal/website;
- training activities for internal recipients.

3. GENERAL PRINCIPLES

- **Legality**

Fiorini International Italia consistently confirms its commitment to promoting new development opportunities while ensuring the protection and compatible and ethical use of natural and human resources. It manages and organises its activities in compliance with the legal requirements in force in the countries in which it operates and in accordance with the principles of the Code.

- **Staff development and respect and dignity of the individual**

Human resources are the primary asset for the development and success of **Fiorini International Italia**, which is therefore committed to protecting and enhancing their value in order to increase their skills and positive participation. To this end, Fiorini International Italia contributes by providing appropriate information and training tools. Fiorini International Italia is also committed to promoting respect for the physical and cultural integrity of the individual and respect for relationships with others. It guarantees working conditions that respect individual dignity, protect and promote the value of human resources, skills and competences, diversity, and work-life balance.

- **Non-discrimination**

In its internal relations and in its relations with third parties, **Fiorini International Italia** recognises and respects the principles of equality and does not discriminate on the basis of age, racial and ethnic origin, nationality, political and trade union opinions, religious beliefs, sexual orientation, gender identity, physical and mental disabilities, or any other personal characteristics not related to the workplace.

- **Quality**

Fiorini International Italia is committed to being attentive to the changing needs of the market and to constantly improving the quality of its products and services, guaranteeing safety, reliability and innovation.

- **Health and environmental protection**

Fiorini International Italia strives to ensure that its employees and collaborators have safe, healthy working environments that comply with current legislation. It promotes a culture of worker health and safety in the workplace and respect for the environment, understood as a common resource to be safeguarded for the benefit of the community and future generations with a view to sustainable development.

- **Stakeholders**

Fiorini International Italia is committed to conducting its activities with consideration for the interests of its stakeholders, in the knowledge that dialogue and shared objectives are tools through which mutual value can be created.

4. CONFLICT OF INTEREST

The utmost care must be taken to avoid situations in which those involved in transactions may be or appear to be in a conflict of interest.

In order to avoid such situations, it should be noted that:

- Any operation/activity must be undertaken solely and exclusively in the interests of Fiorini International Italia in a lawful, correct and transparent manner.
- Conflicts of interest between personal (or family) economic activities and the duties performed at Fiorini International Italia must be avoided.

It is forbidden to carry out work activities (of any kind and even outside working hours) for customers, suppliers and competitors of Fiorini International Italia.

In any case, it is necessary to:

- avoid all situations and activities that may conflict with the interests of **Fiorini International Italia** or that may interfere with the ability to make impartial decisions in the best interests of the company and in full compliance with the principles and contents of the Code of Ethics;
- in general, to perform the duties and responsibilities assigned to you exactly.

In the event of a conflict of interest as described above, everyone is required to refrain from participating, directly or indirectly, in any decision or resolution relating to the matter to which the conflict relates.

Members of corporate bodies who, in a given transaction, have an interest, either their own or that of third parties, are required to promptly disclose this to the shareholders.

5. CONFIDENTIALITY

- **Fiorini International Italia** guarantees the confidentiality of the information in its possession by refraining from seeking and processing confidential data (except in cases of explicit authorisation and compliance with applicable laws). Specific data protection procedures are implemented in this regard.
- Any information, data or documents that Employees become aware of during their work are the exclusive property of **Fiorini International Italia**.
- All Employees are required to maintain the strictest confidentiality regarding confidential information relating to Fiorini International Italia (and/or its Employees) of which they become aware. Exceptions are permitted provided they are formally authorised by their Line Manager.

6. COMPETITION

Fiorini International Italia bases its competitive strength on the quality of its products/services, technical support, the professionalism and commitment of its employees, and technological and

organisational innovation. It recognises the value of free and fair competition and refrains from unlawful agreements and abusive behaviour.

7. RELATIONS WITH STAKEHOLDERS

In line with Freeman's definition (1984), we group our stakeholders into two categories: "Stakeholders ... in the strict sense, are all those individuals and groups that are clearly identifiable and on whom the company depends for its survival: shareholders, employees, customers, suppliers, etc.. In a broader sense, a stakeholder is any clearly identifiable individual who can influence or be influenced by the organisation's activities in terms of products, policies and work processes. In this broader sense, public interest groups, protest movements, local communities, government bodies, business associations, competitors, trade unions and the press are all to be considered stakeholders." For us, therefore:

- **Primary stakeholders** are those without whose continued participation the company cannot survive as a functioning entity; they are therefore shareholders, investors, employees, customers, suppliers, but also governments and communities that provide infrastructure, markets, laws and regulations.

- **Secondary stakeholders** include those who are not essential to the survival of a company or who exert a direct influence on the company itself; they therefore include individuals and groups who, although they have no direct relationship with the company, are nevertheless influenced by its activities, such as future generations.

The success of a company today is linked to its social partners and depends on the quality of its relationships with the various stakeholder groups with which it interacts through the mutual market of goods and services or with which it comes into contact in any way. Today, it is not possible to manage a company effectively without being able to understand and anticipate the legitimate expectations of its stakeholders, which Fiorini International Italia is always committed to meeting.

The quality of the products and services offered, environmental protection, workplace safety, the safeguarding of ethical and social values, the fairness and reputation of the organisation and its members, harmony with the surrounding area and therefore with neighbouring landowners and these are now the frontiers that organisations such as Fiorini International Italia want to explore and coordinate in order to be successful and move beyond this transition phase from a corporate vision focused primarily on profit to one in which companies must take ownership of and embrace the demands of the various stakeholder groups.

Being credible in terms of ethical correctness and reputation therefore guarantees the necessary level of interest on the part of individuals in the local community towards Fiorini International Italia.

All this leads us to believe that an ethical approach to the globalisation of activities is the only way to achieve sustainable and long-lasting development, both for individual companies, regardless of their size, and for the community.

Aware of market developments and the new needs not only of customers but of all corporate stakeholders, Fiorini International Italia has structured an effective ethical and social quality system capable of satisfying the conditions that allow the company to remain and grow in its reference market, perfectly integrated into the community, the territory and the internal and external environment.

8. CUSTOMER RELATIONS

Fiorini International Italia bases its conduct in customer relations on the principles of transparency, reliability, responsibility and quality.

Recipients must therefore:

- comply with laws and regulations concerning the performance of their activities;
- scrupulously observe the provisions of this Code of Ethics and internal procedures relating to the management of customer relations;
- provide the customer with all information on the terms and conditions of the contract, so that the customer is fully aware of them at the time of finalising the agreement, and on any changes to the economic conditions and the outcome of any checks requested by the customer;
- adopt a behaviour based on helpfulness, respect and courtesy, in line with Fiorini's standards, characterised by the highest level of professionalism.

Fiorini International Italia undertakes to respond to suggestions and complaints from customers, using appropriate and timely communication systems and providing accurate, complete and truthful information and/ s so that customers can make informed decisions.

Communications and advertising messages addressed to customers are inspired by the criteria of simplicity, clarity and transparency, avoiding the use of any misleading, evasive or unfair practices

and ensuring that the products and services provided to customers correspond to commercial standards and the aforementioned communications. Fiorini International Italia excludes any advertising and/or communication tool that in any way misleads customers about the quantity, quality, origin and provenance of the products/services offered.

In the event of incidents involving products being reported, Fiorini International Italia undertakes to promptly initiate investigations to ascertain the causes and, where necessary, to take all measures (including collaboration with public institutions) to eliminate factors that may pose a serious threat to public health and safety and to prevent such incidents from recurring in the future.

9. RELATIONS WITH SUPPLIERS

With regard to the supply of goods and services, the employees in charge are required to:

- Comply with company procedures relating to the selection, choice and monitoring of Suppliers (including the request for self-certification regarding compliance with specific social obligations). **Fiorini International Italia** undertakes to seek out suppliers, external collaborators and commercial partners with the appropriate professional skills who fully share the principles and contents of the Code of Ethics. The selection of suppliers, consultants and external collaborators takes into account their professionalism as well as the relationships that Fiorini International Italia intends to develop and the projects it intends to launch. Suppliers and consultants are selected according to criteria of transparency, competitiveness and efficiency.
- No supplier who meets the requirements shall be precluded from competing for the sale/supply of the necessary products/services (without prejudice to the pursuit of the maximum competitive advantage for **Fiorini International Italia**).
- Obtain the cooperation of suppliers in meeting the company's requirements in terms of quality, cost and respect for delivery times.
- Observe and enforce the contractual conditions stipulated in writing.
- Maintain an open and frank dialogue with Suppliers (in line with good commercial practice).

- Promote the establishment of lasting relationships for the progressive improvement of performance in the protection and promotion of the principles and contents of the Code of Ethics.
- Base professional and commercial contributions on commitment and professional rigour and align them with the level of professionalism and responsibility that characterises Fiorini International Italia, with the attention and precision required to pursue respect for and dissemination of its prestige and reputation.

Fiorini International Italia does not tolerate and combats practices of corruption, collusive behaviour, solicitation of advantages, payment of material and immaterial benefits, as well as other advantages aimed at influencing or compensating representatives of institutions, members of corporate bodies, and employees.

10. RELATIONS WITH PUBLIC INSTITUTIONS

Any relationship with Public Administration is based on respect for the impartiality to which it is bound and the smooth running of relations. Such relationships are reserved solely for the functions and responsibilities delegated in this regard.

It is not permitted to promise and/or offer objects, services, benefits or favours of value (to managers, officials or employees of the public administration or their relatives) in order to obtain an interest or advantage for **Fiorini** International Italia. Offers of gifts or other benefits of modest value are permitted only if they are in line with legitimate customs and practices.

The recipients of the Code must maintain a attitude of maximum availability and cooperation in the event of checks and/or inspections by the competent public authorities.

Fiorini International Italia does not finance political parties, their representatives or candidates and refrains from exerting any pressure (direct or indirect) on politicians.

Fiorini may agree to requests for contributions from non-profit organisations and associations with regular statutes and articles of association.

11. GIFTS

- No form of gift is permitted to representatives of the public administration or public officials or to private individuals that could reasonably be interpreted as exceeding normal commercial or courtesy practices, or in any case aimed at obtaining favourable treatment in the conduct of any activity connected with **Fiorini International Italia**. It should be noted that gifts are defined as any type of benefit (promise of a job offer, whether as an employee or in the form of consultancy, services, leisure travel, etc.).
- Similarly, managers, employees and all those acting in the name and/or on behalf of **Fiorini International Italia** may not receive gifts or favourable treatment, except within the limits of normal courtesy and provided that they are of modest value. Any gifts received that do not fall within normal customs must be adequately documented and reported to the Supervisory Body.
- In any case, such expenses must always be authorised in accordance with specific company procedures and adequately documented.
- The above rules, relating to both promised or offered gifts and those received, also apply in countries where offering gifts of high value is customary.

12. SPONSORSHIPS

- Sponsorship activities may relate to social, environmental, sporting, artistic and cultural issues in general.
- Sponsorship activities may be carried out subject to the conclusion of specific agreements and verification of the integrity of the beneficiary and the event/initiative being promoted, avoiding the granting of sponsorship to counterparties who are even suspected of belonging to criminal organisations or committing money laundering offences.

13. ACCOUNTING AND CORPORATE TRANSPARENCY

- Any operation or transaction, understood in the broadest sense of the term, must be legitimate and promptly:
 - Authorised
 - Recorded
 - Verifiable

- Consistent
 - Appropriate
- Accounting transparency is based on the accuracy, completeness and authorisation of the basic information for the relevant accounting records.
- Supporting documentation and traceability of the activity carried out is retained for each transaction (each transaction must accurately reflect what is shown in this documentation).
- All company payments must be commensurate with the service and contractual terms and may not be made to anyone other than the contractual counterparty.
- Any type of omission or falsification that Employees become aware of must be reported immediately.
- All persons responsible for preparing the data and information contained in financial statements, reports or other corporate communications required by law are required to verify their accuracy/truthfulness.
- **Fiorini International Italia** directors are prohibited from engaging in any conduct aimed at causing any damage to the company's assets or damage, even potential, to creditors.

14. TAX COMPLIANCE RULES

- **Fiorini International Italia** aims to ensure formal and substantive compliance with the tax regulations of the countries in which it operates by adopting conduct consistent with the principles of transparency, honesty, fairness and good faith.
- **Fiorini International Italia** and all its employees shall refrain from engaging in activities and conduct aimed at evading income tax, value added tax or other taxes in general, as well as customs duties and border taxes, either in the interest or to the advantage of Fiorini or in the interest or to the advantage of third parties.
- Again for the purposes of transparency and tax fairness, **Fiorini International Italia** and the Recipients (each within the scope of their assigned role and in compliance with internal and external regulations):
 - shall not introduce fictitious liabilities, using invoices or other documents for non-existent transactions (from a subjective or objective point of view), in the declarations relating to said taxes and in their preparation;

- check that the invoices and accounting documents received refer to services actually performed by the issuer and actually received by Fiorini International Italia;
- they do not record invoices or other documents for non-existent transactions in the mandatory accounting records, nor do they keep them for the purposes of providing evidence to the tax authorities;
- verify the correct application of value added tax;
- refrain from carrying out simulated transactions, objectively or subjectively, as well as from using false documents or other fraudulent means likely to hinder assessment and mislead the tax authorities;
- refrain from indicating in their income tax or value added tax returns assets for an amount lower than the actual amount or fictitious liabilities or fictitious credits and withholdings;
- refrain from issuing or releasing invoices or other documents for non-existent transactions in order to allow third parties to evade income or value added tax;
- refrain from concealing, altering or destroying, in whole or in part, accounting records or documents that must be retained, so as to prevent the reconstruction of income or turnover, with the aim of evading income or value added tax, or allowing third parties to evade such taxes;
- refrain from simulating the disposal of their own or others' assets or from performing other fraudulent acts on such assets that could render the tax authorities' enforcement procedures wholly or partially ineffective, with the aim of evading the payment of income tax or value added tax or interest or administrative penalties relating to such taxes.

15. INTERNAL CONTROLS

- Internal controls refer to all the tools necessary or useful for directing, verifying and pursuing the activities of **Fiorini** International Italia with the aim of ensuring compliance with laws and company procedures, protecting company assets, effectively managing corporate activities and providing clear, truthful and accurate information on the financial, economic and capital situation of **Fiorini** International Italia, as well as identifying and preventing risks that Fiorini may encounter.
- It is the responsibility of **Fiorini** International Italia to promote, at all levels, an internal culture characterised by awareness of the existence of controls and oriented towards the exercise of such controls.

16. ANTI-MONEY LAUNDERING

- **Fiorini International Italia** scrupulously follows the regulations aimed at preventing money laundering, self-laundering and the financing of criminal activities.
- To this end, **Fiorini International Italia** undertakes to comply with all national and international anti-money laundering rules and regulations.
- Before establishing relationships or entering into contracts with non-occasional customers in long-term business relationships, they must ensure the moral integrity, reputation and good name of the counterparty.
- To this end, the Recipients are required to:
 - immediately report any potentially anomalous situations of which they are aware in order to facilitate the prevention and combating of money laundering;
 - accurately verify the information available on counterparties and avoid entering into or maintaining commercial or financial relationships in cases where there is reasonable doubt that the counterparties may engage in conduct that constitutes money laundering offences;
 - make and accept cash payments only within the limits and for the amounts permitted by law;
 - ensure adequate cooperation with the competent authorities in the prevention, combating and suppression of counterfeiting and falsification of banknotes, coins and any other means of payment.
 - In the management of financial flows, it is forbidden to tolerate irregularities which, according to normal professional diligence, give rise to suspicions about the legality and regularity of the origin of the money received.

17. PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY

- Recipients shall act in full compliance with the industrial and intellectual property rights legitimately belonging to third parties, as well as in accordance with the provisions contained in laws, regulations and conventions designed to protect such rights.
- Fiorini International Italia encourages and promotes the inventiveness and technological evolution of products and processes developed by its employees and third parties working on behalf of Fiorini, striving to prevent or eliminate violations of Fiorini's rights.

- To this end, all Recipients:
 - must refrain from any conduct that may constitute the usurpation of industrial property rights, the alteration or counterfeiting of distinctive signs of industrial products, or of patents, industrial designs or models, whether national or foreign, as well as from importing, marketing, using or otherwise putting into circulation industrial products with counterfeit or altered distinctive signs or made by usurping industrial property rights;
 - they must not use, unlawfully and/or improperly, in the interests of the company or third parties, intellectual property, or parts thereof, protected by legislation on copyright infringement.

18. PRIVACY PROTECTION AND CYBER CRIME

- In carrying out its activities, Fiorini International Italia undertakes to comply with the provisions of European Regulation No. 2016/679 (General Data Protection Regulation - "GDPR") and Legislative Decree 196/2003 ("Privacy Code") as amended by Legislative Decree 101/2018.
- Fiorini International Italia's activities constantly require the acquisition, storage, processing, communication and dissemination of data, documents and information relating to negotiations, transactions and contracts.
- **Fiorini International Italia's** databases may also contain personal data protected by privacy legislation, data that cannot be disclosed externally and, finally, data whose disclosure could cause damage to Fiorini International Italia itself.
- Each Recipient is therefore required to protect the confidentiality of the information learned in the course of their work.
- All information, knowledge and data acquired or processed by Recipients through their duties may not be used, communicated or disclosed.
- Each Recipient must:
 - acquire and process only data that is necessary and directly related to their duties;
 - store such data in such a way as to prevent unauthorised third parties from gaining access to it;

- communicate and disclose the data within the framework of the procedures established by Fiorini or with the prior authorisation of the person delegated to do so;
 - determine the confidential and private nature of the information in accordance with the procedures established by **Fiorini International Italia**.
- Fiorini International Italia, for its part, undertakes to protect the information and data relating to its recipients and third parties and to prevent any misuse thereof.

19. RELATIONS WITH CUSTOMS AUTHORITIES

- In its relations with the Customs Authorities, **Fiorini International Italia** undertakes to scrupulously comply with the relevant regulations in force, adopting all appropriate control and surveillance measures to prevent any possible conduct aimed at smuggling.
- To this end, **Fiorini International Italia** adopts, among others, the following prohibitions on conduct:
 - prohibition on removing goods from the customs control system established for the assessment and collection of border duties, by not declaring them to customs or by concealing them or falsifying transport and/or commercial documents;
 - prohibition on the improper use of foreign goods imported/exported duty-free and with reduced border duties, by allocating or using them in a manner other than that for which the exemption or reduction was granted;
 - prohibition on introducing foreign goods into the State to replace domestic or nationalised goods shipped by cabotage or in circulation;
 - prohibition on evading the payment of border duties through the artificial manipulation of goods or through the use of fraudulent means;
 - prohibition on omitting or delaying the presentation of customs declarations, or improperly handling customs formalities by providing false information about the quantity, quality or value of goods.
- Finally, with regard to customs compliance, **Fiorini International Italia** pays particular attention to all stages of the goods import process in order to ensure full compliance with the relevant regulations.

20. PERSONNEL MANAGEMENT

- The selection of personnel to be hired is carried out, guaranteeing equal opportunities to all interested parties (gender neutral and no gender gap), based on the correspondence of the candidates' profiles and their specific skills with the company's requirements. The information requested is limited to that necessary to verify the suitability of the candidate's profile, respecting their privacy and opinions.
- Child labour is prohibited. Personnel are only involved and employed if they are of legal age, and are always hired and/or involved with regular employment or collaboration contracts, and are guaranteed freedom of association, recognising their right to collective bargaining. During the course of their employment and whenever changes are made, each employee receives complete information regarding:
 - The characteristics of the role and the tasks to be performed.
 - Regulatory and remuneration elements (as regulated by the National Collective Labour Agreement and supplementary bargaining agreements).
 - Rules and procedures associated with the work to be carried out, to be complied with for the purposes of health, safety and hygiene, as well as environmental protection, as also provided for in the Quality, Health and Safety Management System policies.
 - Copy of the Code in force.
- **Fiorini International Italia** guarantees, without any gender discrimination, the right to equal pay for equal work, and it is company policy to respect the minimum age (legal age) for access to work.
- Human resources management is systematically based on the principles of fairness and transparency, avoiding any form of discrimination ('gender gap') and/or 'forced labour'. In terms of the organisation of work, flexibility that facilitates maternity and childcare is favoured.
- **Fiorini International Italia** considers any act or behaviour that constitutes harassment or violence in the workplace to be unacceptable and undertakes to take appropriate measures against those who have committed such acts.
- Harassment or violence is defined as:
 - when one or more individuals repeatedly and deliberately suffer abuse, threats and/or humiliation in the workplace.
 - when one or more individuals are assaulted in the workplace.

Harassment and violence may be perpetrated by one or more superiors, or by one or more employees, with the aim or effect of violating the dignity of the person, harming their health and/or creating a hostile working environment.

It is recognised that the dignity of individuals cannot be violated by acts or behaviour that constitute harassment or violence and that harassing behaviour or violence suffered in the workplace must be reported.

Everyone in the company has a duty to collaborate in maintaining a working environment in which the dignity of each individual is respected and interpersonal relationships based on principles of equality and mutual fairness are encouraged.

21. USE OF COMPANY ASSETS

- Fiorini International Italia's assets must be used in strict compliance with the policies and regulations relating to Health and Safety at Work and environmental protection.
- All employees are required to use Fiorini International Italia's infrastructure, equipment, tools and materials with the utmost respect and to report any misuse by other employees to Human Resources.
- All Employees are required to use company equipment solely for the performance of their duties and tasks (whether carried out inside or outside Fiorini International Italia).

22. VIOLATIONS AND SANCTIONS

The provisions of this Code of Ethics are an integral part of the contractual obligations assumed by the Recipients or by persons having business relations with Fiorini International Italia.

Violation of the principles set out in the Code and in the procedures provided for in the internal protocols compromises the relationship of trust between Fiorini and its directors, employees, consultants, collaborators in various capacities, customers, suppliers, commercial and financial partners.

In cases where the behaviour constitutes a criminal offence and due to the consequent compromise of the relationship of trust established with Fiorini International Italia, the latter has the right to take disciplinary action, regardless of whether criminal proceedings are initiated.

In the case of an employment relationship and with regard to the type of sanctions that may be imposed, the procedures set out in the Workers' Statute and/or local and special regulations, where applicable, shall apply.

Measures for violations of the Code are adopted by hierarchical superiors¹, informing the Supervisory Body, or in specific cases by Fiorini International Italia itself, in accordance with applicable laws and relevant national or company employment contracts.

In the event of failure to comply with "employee obligations" in the area of "Health and Safety at Work", penalties shall apply.

If the violation of ethical standards is committed by other parties (third parties) who are required to comply with this Code by virtue of specific clauses included in the relevant contractual relationships, any failure to comply with the principles and rules contained in this Code will result in the imposition of sanctions in the form of a warning, the application of a penalty (compensation for damages) or the termination of the contract.

23. APPROVAL, SUPERVISION AND REPORTING

Approval

Each administrative body of **Fiorini International Italia** approves the Code of Ethics, as well as any changes/additions made to it, taking care of any revisions to the Code of Ethics.

Body responsible for supervising the application of the Code of Ethics

Monitoring of compliance with the Code of Ethics by the Recipients belonging to Fiorini International Italia S.p.A. is entrusted to the Supervisory Body of Fiorini International Italia S.p.A., appointed pursuant to Legislative Decree 231/01.

¹ In the event that the violation has been committed by one or more members of the administrative body, the hierarchical superior shall be understood to be the supervisory body and vice versa.

Monitoring compliance with the Code of Ethics by Recipients belonging to Fiorini International Czech Republic s.r.o. is the responsibility of the Head of Whistleblowing Management of the Czech company.

Monitoring compliance with the Code of Ethics by Recipients who are External Collaborators and Suppliers is the responsibility of the Contract Manager, in consultation with the Supervisory Body for matters relating to Fiorini International Italia S.p.A.

The Supervisory Body is responsible for the following tasks:

- monitoring compliance with the Code of Ethics, including with a view to preventing the risk of offences under Legislative Decree 231/01;
- formulating its observations on ethical issues that may arise in the context of company decisions and alleged violations of the Code of Ethics relating to it;
- providing operational support in the interpretation and implementation of the Code of Ethics, as a constant reference tool for correct behaviour to be adopted in the performance of one's duties;
- monitor and coordinate the periodic review of the Code of Ethics, including through proposals for adjustments and/or updates, in order to take into account changes in corporate governance and/or organisation;
- prepare and approve the communication and ethics training plan;
- reporting any violations of the Code of Ethics to the competent corporate bodies, suggesting the sanctions to be imposed and verifying the effective application of any measures imposed.

Reports

Recipients may also report any violation or suspected violation of the Code of Ethics in accordance with the Whistleblowing Policy, accessible at the following link <https://fiorinint.integrityline.com/>.

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