

CODE OF CONDUCT



April 2023

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1. INTRODUCTION

COMPOPACK, based in **Ozzano Dell'Emilia** Italy, registered at the Bologna Chamber of Commerce Bologna, Italy **REA N. BO-549332 VAT N. 03827261201**, develops and delivers packaging engineering solutions and automatized machines to clients worldwide.

Our mission is to develop and commercialize globally sustainable packaging solutions that are designed to reduce (quantity of packaging employed), rationalize (re-analyze usefulness of existing solutions), re-use and re-cycle specific solutions with an eye to Sustainability and Circular Economy metrics. This may include offering new turn-key solutions (e.g. EcoPoD) or Consulting on processes to move towards these metrics and solutions.

COMPOPACK strongly believes that our activities and end results are important professions and should be employed to improve the quality of life for all people.

In general, the Code of Conduct serves as a guideline in our day-to-day business and shall be compliant with national and international statutory provisions.

We think that all our services require adherence to the highest principles of ethical conduct either when we develop our own projects or when we are working as supplier/consultants. In addition to that, we are particularly concerned about any direct, or indirect, consequences that a product designed by us can have on the environment along its entire life-cycle. For this reason, this document is taking into due account the contents and the seventeen sustainable development goals of AGENDA ONU 2030

Since COMPOPACK was founded, we have striven to ensure that environmental aspects and obligations in our business are identified and considered in the best way, and today, being “packaging” one of the most sensitive topics interfering with waste management and recycling, we feel even more professionally responsible.

The Code does not cover every legal or ethical issue that you may confront at the Company, however we have set forth basic principles that should help

- (i) to create and run a good place of work for our employees and for anyone who will be involved in our projects even temporarily
- (ii) to be a well-respected company.

1.1. Recipients of the Code

This code applies to :

- Board members
- All staff – employed by COMPOPACK directly or through Job Agencies
- Third parties (any individuals or other organization working for COMPOPACK through specific contract agreement)
- Consultants, freelancers, etc...

1.2. Fundamental duties to society and public infrastructure

- accept responsibility for every action and engineering result including being open to ethical scrutiny and assessment;
- manage risk using knowledge granted by a whole system viewpoint and understanding of systemic interfaces
- promote the understanding, implementation and acceptance of prudent engineering measures

2. RULES OF BEHAVIOUR

Board members, personnel and close collaborators shall be provided with a copy (or soft-copy) of this document.

COMPOPACK wants to be perceived and recognized at all levels as a responsible business partners, therefore, all individuals working for us shall conduct any activity in a manner that respects **Human right, Health & Safety and Environment**

Regarding the technical staff:

Engineers are expected to work in accordance with the following principle - Engineers hired or collaborating with Compopack shall hold paramount the safety, health and welfare to the public and they shall:

- perform services only in the areas of their competence
- issue public statements only in an objective and truthful manner
- act for each employee or client as faithful agents or trustees
- be guided in all their relations by the highest standards of honesty and integrity
- strive to serve the public interest
- be encouraged to adhere to the principles of sustainable development in order to protect the environment for future generation
- not disclose, without consent, confidential information concerning the project, a partial technical process or as a whole in which they are involved directly or indirectly
- not be influenced by conflict of interest
- avoid any circumstances creating bad reputation to the Company

- decline commissions or allowances from contractors or other parties dealing with the clients or any other person in connection with work for which the engineer is responsible

3. GUIDING PRINCIPLES

3.1. Integrity

Staff (Consultants included), Customers, Suppliers are placed by the company at the centre of its work

3.2. Fair and objective

Always working without fear nor favors

3.3. Open and accountable

Accepting full responsibility for its actions

3.4. Excellence

Making all efforts to be always at the highest level of professionalism

3.5. No corruption/No bribery

Always acting within the Law.

Only dealing with respectable business partners, the company refuses any type of illegal activities breaking the law

3.6. No discrimination

The company does not tolerate individuals whose behavior manifests being against ethnic origin, religion, age, disability and gender

4. ENVIRONMENTAL PROTECTION BEHAVIOUR

COMPOPACK'S environmental protection policy is based on international standards, where our products, patents and services are concerned; we make every effort to work with a low impact on our planet - We also seek the contribution of our partners to actively support us to reach this target.

Being our work-sites located in the Italian region Emilia-Romagna, we operate in compliance with national and regional environment regulations:

<https://ambiente.regione.emilia-romagna.it/it>

We also operate in line with international standards and we work preferably with organizations that demonstrate to be compliant or certified ISO 14001 – ISO 45001 and/or to have implemented a suitable and ethical management system.

To ensure commitment to our environmental policy, we set forth some basic recommendations and actions contained in our “Green procedures” that we apply at our base and labs – see below an excerpt (4.1 paragraph) :

4.1. Green procedures basics:

- Using email where possible and reducing the use of paper in our operations
- Using low energy light bulbs
- Reducing and monitoring energy consumption for electricity, gas, and water
- Turning off unnecessary lights
- Turning off unused electronics
- Purchasing recycled office and kitchen supplies when needed
- Actively promoting waste management by Reducing, Reusing, and Recycling
- Evaluating our environmental performance through periodic reviews

As far as we can, we also want to source materials from eco-friendly responsible suppliers.

5. RESPECT DATA – INFORMATION PRIVACY

Technical data as well as other important information shall be stored discreetly and managed by specific staff member; sensitive financial records, contracts, and other confidential economic matters, shall be treated by Board Members and specific staff member belonging to the administration area only.

“Confidential information” also includes the following types of personal information about COMPOPACK’s employees, customers, contractors, suppliers etc...

- E-mail or home addresses
- Telephone numbers
- Credit card, bank account
- Medical information
- Any other personally identifiable information

6. SOCIAL MEDIA

Social Media Employees, any internal or external collaborators and contractors cannot post on social media on behalf of the Company unless authorized to do so. Exercise caution when posting on personal social media sites. If your connection to COMPOPACK is known then information you post could have a negative impact on the Company’s reputation. Do not post offensive comments or images. Never share confidential or commercially sensitive information on your social networks such as company or product performance, sales figures, product developments, etc.

The sensitive section of the website, such as the NEWS or other changeable pages, shall be modified and updated taking into account the strategies and corporate policy.

Personal social media (facebook, instagram, linkedin) can not be used to put on display the company’s activities.

Only official social media are allowed and they will be managed by appropriate staff only. Any postings shall be in line with the corporate code of conduct.

7. GIFT – HOSPITALITY AND OTHER PROMOTIONAL MATERIAL

Some expressions of gratitude towards customers, external collaborators, and other individuals who have given a fair-play and honest contribution to the success of the activity of COMPOPACK are accepted but only gifts of little value are acceptable. Gifts in either direction are just that, no reciprocal or "preferential treatment" should be expected by the receiving side and the value of gift shall not exceed € 1000 and if received will be declared in the balance sheet.

8. POLITICAL ACTIVITY

COMPOPACK does not participate in any political parties and does not support by making any political action committees. We respect any political orientation and if anyone working for COMPOPACK shall make clear at all times that your political ideas and/or actions you choose are your own and not those of the Company.

9. HUMAN RIGHTS

Consistent with our core values, we conduct business with high respect for individuals and the cultures they belong to.

We work at all level without regard to race, color, ancestry, religion, gender, gender identity, gender expression or sexual orientation, marital status, age, disability, medical conditions or any other characteristics that might generate a social conflict. Therefore, COMPOPACK expects that all relationships among persons in our workplace will be correct and respectful.

10. VIOLATIONS

10.1. Reporting Violations

We know that we must report any breach of this Code that we discover.

Failure to report is a violation of the Code.

By having the courage to raise awareness of potential issues, we help protect our reputation, our employees and our customers.

You can make a report in any of the following ways.

You can contact our management by writing to

info@compopack.it

Legal email PEC: compopack@pec.it

10.2. Sanctions

Against demonstrations that any person dealing with COMPOPACK 's activity has worked or acted causing a breach of the items above, sanctions will be made effective by the Management of COMPOPACK – Depending on the severity of circumstances, we will establish the delivery of a letter of reprimand accompanied by:

- suspension of grant/contract/ fee payment / salary
- revocation of the contract temporary
- revocation of the contract permanently

- intervention of the police
- intervention of the judicial local power body

This Code of Conduct was approved by 100% of the company shareholders during the 2023 shareholder meeting on 15th April 2023 and verbalized at the same chaired by Stephen C. Lowe the CEO.

The document will be subject to review every year in order to make revision according to the local Gov. guidance and to make any improvements if necessary.

Stephen C. Lowe

Marco Verri

Massimo Casadio