

Bogophane Srl

CODE OF CONDUCT

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1.1. Introduction

This document is a tool made available to guide those who operate in the interest or to the advantage of Bogophane Srl towards behaviors that the Company deems responsible. The Code of Conduct highlights the ethical, social and environmental responsibilities that Bogophane Srl and its directors, managers, employees, white-collar workers, agents, collaborators, suppliers, etc., must adhere to in their relationships with their stakeholders (hereinafter "stakeholders"). The Code of Conduct is therefore the document that sets out the principles that Bogophane Srl considers important in the socially responsible management of corporate activities involving Bogophane Srl's stakeholders.

1.2. The company

Bogophane Srl, better described in the general part of the organizational and management models to which this document is an attachment, has as its corporate purpose (i) the manufacture and trade of packaging films; (ii) the acquisition through purchase and/or subscription and the negotiation of shares in joint-stock companies, as well as the administration of its own shares, all excluding any activity carried out with the public ; (iii) the execution of all acts and all contractual, commercial, real estate and financial transactions that the directors deem useful for the achievement of the corporate purpose, with the exclusion of financial activities towards the public.

1.3. Purpose of the document

The Code of Conduct identifies the set of principles and values that guide the Company in pursuing its objectives, respecting the interests of all stakeholders, both directly and indirectly connected to the company. Bogophane Srl requires all those who, in any capacity, operate for the benefit or in the interest of the Company to commit to observing and ensuring that the values and principles set forth in this Code of Conduct are observed.

1.4. Scope of application and recipients of the Code of Conduct

The values, principles, and rules of conduct defined in the Code are primarily intended for directors, employees, collaborators (defined as all individuals operating on behalf of the Company under an employment, collaboration, or similar contract), even if occasional, suppliers of goods and services, commercial partners, customers, agents, and similar. They must comply with the principles and provisions of the Bogophane Srl Code of Conduct, protecting the integrity of the company's tangible and intangible assets.

2. Our principles, values and behaviors

Bogophane Srl's Code of Conduct is based on universal and cross-cutting principles and values, which are considered the foundation for guiding corporate behavior in every process and activity. Bogophane Srl embraces the following values and principles:

- cooperative and transparent approach
- reputation and fiduciary duties
- responsibility oriented towards the common good
- quality of the activities carried out
- compliance with the law
- loyalty, honesty and fairness
- impartiality and equal opportunities from a gender perspective and the valorization of diversity
- transparency, correctness and completeness of information
- protection of health and safety in the workplace
- environmental protection

- correct use of financial resources
- confidentiality of your own and third party information
- protection of industrial and intellectual property and copyright of one's own and third parties
- correct management of assets, cash flows and the fight against corruption and money laundering and self-laundering of money and/or other utilities
- fight against organized crime
- fairness in relations with the Public Administration.

3. Our stakeholders

Stakeholders include those directly or indirectly involved in a project or activity of Bogophane Srl or who are affected by the effects it generates on the community in which the Company operates.

4. Protection and valorization of people (human resources)

4.1. Human resources selection

During the selection process, the information requested must be strictly related to the verification of the aspects required for the professional profile requested, while respecting the confidentiality of the acquired data.

4.2. Human resources management

Bogophane Srl avoids any form of discrimination. Anyone who becomes aware of behavior that conflicts with the principles underlying this Code of Conduct must promptly inform their superior or the appropriate functions and bodies (including the Supervisory Body).

4.3. People / Human Resources

Bogophane Srl recognizes the centrality of the people (human resources) who work within the company and the importance of establishing and maintaining relationships with them based on loyalty, mutual trust, and the maintenance of ethical standards. Company personnel are required to act loyally in order to fulfill the obligations undertaken in their employment contract (or collaboration contract, or mandate received from the Company).

4.4. Employment relationship

The employment relationship with Bogophane Srl is governed by employment contracts (employee or collaboration), in accordance with the forms established by current legislation. Any form of irregular employment, nor the employment of non-EU workers without a valid residence permit or regular employment contract, is tolerated.

4.5. Health and safety at work

Bogophane Srl is committed to promoting and strengthening a culture of health and safety in the workplace, developing techniques to improve risk awareness and knowledge and compliance with current legislation on prevention and protection, and promoting responsible behavior among all workers and collaborators. In particular, Bogophane Srl prioritizes the implementation of preventive measures aimed at protecting the health and safety of its employees and other stakeholders.

4.6. Environmental safety

Bogophane Srl is committed to spreading and consolidating a culture of respect for the environment by developing techniques to improve risk awareness and knowledge and compliance with current environmental regulations, promoting responsible behavior among all workers and collaborators. In particular, Bogophane Srl favors the implementation of preventive measures aimed at preserving the environment in which its workers operate and that of other stakeholders.

4.7. Privacy Policy

Any investigation or profiling of ideas, preferences, personal tastes, and, in general, private life is prohibited, as are any behaviors that violate the provisions of the Privacy Decree in relationships with individuals.

4.8. Integrity, protection and equal opportunities

Bogophane Srl promotes respect for the physical, cultural, and moral integrity of its employees, ensuring working conditions that respect individual dignity. For this reason, it rejects any act of psychological violence and opposes any discriminatory or harmful attitude or behavior (such as, but not limited to, insults, threats, isolation, excessive intrusiveness, and other professional limitations). Sexual harassment is neither permitted nor tolerated; behavior that may offend a person's sensibilities must be avoided (for example, the display of images with explicit sexual references, insistent and repeated innuendos). Anyone who believes they have been subjected to harassment or discrimination based on age, gender, sexuality, race, health, nationality, political opinions, religious beliefs, etc. is encouraged to report the incident to the appropriate functions and bodies, including the Board of Directors and/or the Supervisory Body.

4.9. Duties of employees and collaborators and prevention of conflicts of interest

Employees and collaborators must conduct themselves with loyalty and integrity, respecting the obligations undertaken in their employment or collaboration contracts and ethically compliant with this Code, as well as legally and professionally correct, ensuring the required performance. They are also required to report, through the appropriate channels, any violation of the rules of conduct established by the Code of Conduct and/or internal procedures. Employees and collaborators must guarantee the integrity and confidentiality of the information in their possession. They must draft all internal and external communications in clear, objective, and comprehensive language, allowing for any verification by colleagues, managers, or authorized external parties upon request. Furthermore, employees and collaborators are required to act with the utmost diligence to protect company assets, through responsible behavior in line with the instructions and procedures governing their use. In particular, each employee and collaborator must use the assets entrusted to them scrupulously and sparingly and avoid improper use of company assets that could cause damage or reduce efficiency, or otherwise conflict with the company's interests. Every employee and collaborator is responsible for protecting the resources entrusted to them. Everyone is required to avoid situations that may lead to conflicts of interest. Everyone is prohibited from personally taking advantage of business opportunities they become aware of while performing their duties.

4.10. Duties of administrators and unit managers

The Company's Directors and the Managers of organizational units must implement and promote their own behavior in line with the provisions of this Code of Conduct, in order to set an example for their employees and collaborators.

5. Criteria of conduct in relations with customers

5.1. Sales contracts

Bogophane Srl's contracts and communications to customers (including advertising messages) must be consistent with standards of completeness, transparency, and professionalism. Contracts must be comprehensive and compliant with applicable regulations, ensuring that no information relevant to the customer's decision is overlooked. Therefore, contracts must be drawn up without evasive intent and with fees appropriate to the service provided.

5.2. Customer engagement

Bogophane Srl is committed to always responding to suggestions and complaints from customers and associations, using appropriate and timely communication systems.

5.3. Impartiality and fairness in customer relations

Contracts with customers must be conducted in good faith, with proper execution of obligations and prompt communication of any changes to the contractual conditions, including, without limitation, any financial or technical changes to the scope of the service resulting from any cause. Furthermore, evasive or otherwise unfair practices must be avoided in any case.

5.4. Quality of services

Based on the needs of its member municipalities, Bogophane Srl is committed to providing services that meet reasonable customer expectations and protect their safety and security, according to appropriate quality standards. This is also achieved through periodic monitoring of perceived quality and the full compliance of the aforementioned services with the provisions of its contractual standards and communications.

5.5. Customer behavior style and customer satisfaction

The Company's approach to customers is characterized by availability, respect, and courtesy, fostering a collaborative and highly professional relationship. It ensures that the products and services provided to customers comply with commercial standards and communications.

6. Criteria of conduct in relations with suppliers

6.1. Choosing the supplier

Contracts and relationships with suppliers are governed by the procedures of the existing certified quality management system and by this Code of Conduct. Purchasing processes, while aimed at maximizing competitive advantage, must include equal opportunities and be based on mutual respect, loyalty, and transparency.

6.2. Compliance with the laws

Bogophane Srl requires that suppliers act in compliance with:

- workers' rights;
 - of human rights,
 - of the preventive measures,
 - of the environment
- and of the laws in general.

6.3. The protection of ethical aspects

If Bogophane Srl becomes aware that a supplier has engaged in conduct that is not in line with the general principles of this Code of Conduct and the existing organizational models and/or management systems, it is entitled to take appropriate measures, including the exclusion of any further opportunities for collaboration, up to and including the removal of the supplier from the list of qualified suppliers.

7. Conduct criteria in relations with members, corporate bodies, and other stakeholders

Bogophane Srl strives to ensure widespread and informed shareholder participation in decisions within their jurisdiction. The corporate organization adopted by Bogophane Srl complies with the law and is designed, among other things, to: - manage risks; - meet the legitimate expectations of all shareholders, including minority shareholders (where applicable); - provide maximum transparency to company stakeholders; - ensure the proper conduct of management operations; - avoid any type of transaction that is detrimental to creditors and other stakeholders.

7.1. Administrative and accounting management

Bogophane Srl operates in compliance with the law and, in particular, with applicable regulations regarding the preparation of financial statements and all other mandatory administrative and accounting documentation. Accounting records must be kept accurately, completely, and promptly updated to provide a true and fair view of the company's financial position and management activities.

8. Criteria for conduct towards the environment

Bogophane Srl constructively contributes to environmental sustainability in all its activities. For Bogophane Srl, the environment is a primary asset to be protected. To this end, the company organizes its activities by seeking a balance between economic initiatives and environmental benefits, also benefiting the communities in which it operates.

8.1. Use of natural resources and waste management

Bogophane Srl minimizes the consumption of raw materials throughout all phases of its operations. In particular, it pays attention to the proper use of electricity, gas, and water. Waste generated by its operations is regularly stored and disposed of by specialized and qualified personnel in compliance with legal requirements.

9. Criteria of conduct towards particular subjects

9.1. Community

Bogophane Srl and its staff, collaborators, and third parties are aware of the effects and impacts, even indirect, that their activities may have on the general well-being of the community they serve, as well as the importance of social acceptance in the communities in which they operate. For this reason, they conduct any activity that may be beneficial to respecting local communities by supporting initiatives with cultural and social value.

9.2. Antitrust and Regulatory Bodies

The Company fully and scrupulously implements antitrust regulations and complies with all applicable obligations in order to avoid the creation of commercial cartels.

9.3. Relations with competitors

To protect competition and the market, the company does not engage in behavior or enter into agreements with other companies that could influence the competition regime between the various operators in the reference market through unlawful conduct.

9.4. Public Administration, Institutions and Authorities

All relationships with public administration bodies must be based on transparency. The Company and its employees, collaborators, or third parties operating in the interest or to the advantage of Bogophane Srl, the Public Administration (PA), and its officials, must not deny, conceal, manipulate, or delay any information requested by the Authorities and other regulatory bodies during inspections. Employees, representatives of Bogophane Srl, and those with the authority to maintain relationships with and bind the public administration must not promise or offer public officials or public service representatives, or employees of such public bodies in general, money, goods, or other benefits of any kind in order to promote and favor their own interests or the interests of Bogophane Srl, nor compensate or repay them for any action they have taken to obtain the execution of an act contrary to their official duties.

9.5. Parties, trade unions and associations

Corporate officers are prohibited from making contributions to political parties, committees, public organizations, or political candidates. Bogophane Srl rejects any behavior that could constitute illicit financing of political parties.

10. Treatment of contributions, sponsorships, gifts, gratuities and other benefits

10.1. Contributions and sponsorships

Bogophane Srl is open to sponsoring or contributing to social, environmental, sporting, entertainment, and art events, etc., that guarantee quality, have a local, regional, or national reach, and contribute directly to local welfare. Sponsorships must be covered by written contracts with traceable payments, and the event will be documented with photographic material.

10.2. Gifts, gratuities and benefits

The term "gift" refers to any type of benefit (free participation in conferences, promise of a job offer, etc.). A "gift" is characterized by its purpose of promoting the Company's image and brands (brand image). In relationships with private individuals, any form of gift that could even be interpreted as "exceeding" normal commercial or courtesy practices, or in any case aimed at obtaining preferential treatment in the conduct of any activity related to Bogophane Srl, is prohibited. Furthermore, any gift to Italian or foreign public officials, whether auditors, directors, members of supervisory bodies, law enforcement officers, or their family members, is prohibited, so as not to influence their independence of judgment or induce them to secure any advantage for Bogophane Srl or its employees.

11. Implementation and monitoring of the Code of Conduct

11.1. The Supervisory Body of Bogophane Srl

Pursuant to Legislative Decree 231/01 of which this Code of Conduct is an integral and substantial part, the Supervisory Body (OdV) has been established,

11.2. The duties of the Supervisory Body

The Supervisory Body is responsible for monitoring the functioning and compliance with Bogophane Srl's Organizational Model and ensuring it is updated.

Anyone can communicate with the Supervisory Body via internal Bogophane Srl mail or by sending external mail according to the methods set out in the general part of the Bogophane Srl Organizational Model or via the Supervisory Body's email address, which will be communicated by its appointed members, also for cases of whistleblowing reports .

11.3. Dissemination of the Code of Conduct and training activities

This Code of Conduct is brought to the attention of all Bogophane Srl employees through specific dissemination activities (such as, for example, providing all workers and collaborators with a paper or electronic copy of the Code of Conduct; uploading dedicated sections to the company website; inserting specific clauses into employment and supply contracts, etc.). To ensure a proper understanding of the Code of Conduct, all Bogophane Srl employees and collaborators will receive specific training aimed at promoting awareness of the principles, values, and ethical standards contained therein.

12. Violations of the Code of Conduct and sanctioning system

12.1. Violations of the Code of Conduct rules

Compliance with the provisions of the Code of Conduct must be considered an essential part of each employee's contractual obligations, pursuant to and for the purposes of applicable law. Violations of the provisions of the Code of Conduct may constitute a breach of the primary obligations of the employment relationship or a disciplinary offense, with all legal consequences, including those affecting the continuation of the employment relationship. Such violations may also give rise to liability for damages. For all other stakeholders with whom Bogophane Srl maintains contractual relationships, violations of the provisions of the Code of Conduct may constitute a breach of contractual obligations and lead to termination of the contract and/or assignment.

12.2. The sanctioning system for collaborators, consultants and other third parties

Behaviors that violate the provisions of this Code of Conduct, whether committed by employees, collaborators, consultants, or other parties operating with Bogophane Srl, even if not under a contractual employment relationship, may, in the most serious cases, result in the disciplinary consequences set forth in Part 5 of the Bogophane Srl Organizational Model.

Delivery confirmation and inspection

Please complete this form and return it to

I, the undersigned _____ employee of Bogophane Srl, have received and read the "Code of Conduct" that was delivered to me. I agree with the contents and undertake to respect the rules and directives established therein, committing to cooperate with Bogophane Srl and its staff in disseminating and monitoring compliance with it.

Name _____ Surname _____

Department of belonging _____

Date _____

Signature _____