



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

CODE OF
ETHICS

INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

Contents

FOREWORD.....	4
PART I: GENERAL PRINCIPLES	5
1. Definitions.....	5
2. Objective	5
3. Recipients and scope of application	6
4. Core Values.....	6
5. Company commitments concerning the dissemination, application and updating of the Code of Ethics.....	7
PART II: PROTECTION OF HUMAN RESOURCES.....	8
1. Freedom of choice	8
2. Employment relationship.....	8
3. Health and Safety.....	9
4. Child labour.....	9
5. Trade union freedoms	9
6. Work environment	10
7. Confidentiality of personal data	10
PART III: COMPANY RULES OF CONDUCT	11
1. Statutory knowledge and compliance.....	11
2. Diligence and good faith.....	11
3. Confidentiality obligations.....	12
4. Company assets provided.....	13
5. Access to procedures and systems.....	13
6. Use of means of telecommunication	13
7. Conflict of interests.....	14
8. Drawing up financial statements, reports and other company communications envisaged by Law 14	
PART IV: PROTECTING THE ENVIRONMENT	15
1. Procurement of raw materials	16
PART V: EXTERNAL RELATIONS	16
1. Customers.....	16

INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.itPec mail: intrapakspa@pec.intrapak.it

2. Suppliers	17
3. Public Administrations and Trade Unions.....	17
4. Local Community	18
5. Competition	18
6. Bribery, Gifts and Illegal business activities	18
7. Protecting the image of the Group and intellectual and industrial property	19
PART VI: INTERNAL ORGANISATION	19
1. Management and Supervisory Bodies	19
2. Company organisation principles	19
3. Internal Control System.....	20
PART VII: THE CODE OF ETHICS WITHIN THE COMPANY	20
1. Monitoring the implementation of the Code of Ethics	21
2. Reports.....	21
3. Penalties and contractual value of the Code of Ethics	22
4. Approval	22



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

FOREWORD

The story of Intrapak is distinguished by passion for work, focused on research and backed by ongoing investments, with a view to developing technical skills and professionalism in order to play a leading role in technological innovation while proactively liaising with Customers and with the market in general.

The two founders wanted to pursue this objective through decisions and conduct that embrace ethical principles, recognising the social and also the economic value of a company, a way of doing business that we all refer to today as the concept of sustainability.

Intrapak stands out for its market focus, innovation, service, quality, flexibility, productivity, diversified product line-up, food safety, respect for and valuing of human resources as well as environmental friendliness.

We are a modern concern with our eyes firmly trained on the future, backed by a rich history of values and skills, aware of our identity, of our goals, and of the fact that the results have been achieved thanks to the commitment and professionalism of the people who work here, the way we work with passion, dedication, the ability vigorously to take on challenges with responsibility, diligence, loyalty, integrity and fairness.

The Company is well aware of the need to ensure conditions of fairness and transparency in the conduct of business and business activities, in order to protect its position and image, the expectations of its Shareholders and the work carried out by its employees. Indeed, it is in respecting of the legitimate interests of the communities in which it is present with its activities and more generally of its stakeholders, the company decided to issue this Code of Ethics, a tool that formalises the experience of past values and provides behavioural guidance for the future, reducing the risk of conduct that does not conform with the Core Values and providing a reminder of your responsibilities in the event of behavioural deviations. While we appreciate the fact that this Code cannot, on its own, prevent individuals from failing and deviating from our values, we believe that it can raise awareness among all those who work for and on behalf of this company, to inspire their conduct in accordance with the principles set out in this Code. This will guarantee a dual function: to promote the dissemination of homogeneous and transparent conduct during the performance of the appointed tasks and at the same time contribute to the creation of a system suitable for determining a model of prevention also under the law in force.



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

PART I: GENERAL PRINCIPLES

The Code of Ethics can be defined as the company's "Constitutional Charter", a charter of moral rights and duties that defines the ethical and social responsibility of each member of the business organisation.

The Code of Ethics is a mutual commitment that the Company and its employees undertake to respect the values and principles set out therein.

It is an official Company document and compliance with the principles set out therein is an integral part of the contractual obligations of all those who work for and with the Company in various capacities.

A fundamental prerequisite for compliance with the Code of Ethics is the essential principle of compliance with the laws and regulations in force.

1. Definitions

In order to ensure the proper understanding of the Code of Ethics, the following are the main definitions of terms used in this document:

- Collaborator: anyone who works for Intrapak, on its behalf or in its interests. The term collaborator includes consultants, suppliers, customers, contractors, and third parties who act on behalf of and/or in the name of the Company.
- Direct superior: it is the employee's direct superior, who gives them their operational instructions.
- Human Resources Department: a group of people within the company in charge of recruiting, managing and developing personnel.

2. Objective

The objective of the Code of Ethics is to specify the guiding principles to be followed by all Collaborators, to define the commitments that the Company makes to its employees and to express the company's position vis-à-vis the parties concerned.

Compliance with the rules of the Code of Ethics, the policies and the internal rules adopted must be considered an essential part of the contractual obligations of Company employees. As a result, every Employee is required



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

to know the rules contained in this document, as well as the reference operating procedures governing the activities carried out within the scope of their role. The rules contained in the Code of Ethics are also part of the contractual obligations that consultants, contractors, suppliers, third parties acting on behalf and/or in the name of the Company must comply with.

3. Recipients and scope of application

The Code of Ethics is intended for all the Company's human resources and its external stakeholders, and therefore addresses directors, employees, consultants, suppliers, customers, collaborators, third parties acting on behalf and/or in the name of the Company (a set of resources, hereinafter jointly referred to as "collaborators").

Collaborators are therefore obliged to abide by:

- the applicable laws and industry-specific regulations in force;
- the contractual regulations;
- the principles set out in the Code of Ethics.

In addition to abiding by the applicable laws and regulations, and contractual rules, it is therefore the duty of all Collaborators to conduct themselves with the highest integrity and fairness and behave in accordance with the Code of Ethics, also in the performance of their duties outside the workplace, in order to avoid situations that could lead to conduct that does not conform to the company's core values.

The Code of Ethics must also be observed by individuals such as customers, suppliers, consultants, and anyone who has dealings with Intrapak, who will be asked to make an explicit commitment to do so.

4. Core Values

Intrapak shares the values of responsibility, transparency, ethics, respect for stakeholders and, more specifically, embraces the following values as its own:

- observing the law;
- respect for human rights;
- respect and promotion of occupational health and safety;



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

- respect for the individual and equal opportunities;
- non-discrimination;
- honesty;
- equity;
- transparency;
- professionalism;
- diligence;
- loyalty and sense of belonging;
- cooperation;
- attention to the legitimate needs and expectations of stakeholders;
- open dialogue with the community and with its representative bodies;
- respect and safeguarding of the environment;
- efficient and virtuous use of company assets and resources;
- innovation, research and development on an ongoing basis;
- continuous improvement;
- sustainability;
- compliance with market rules;

All collaborators, without distinction or exception, are committed to observing and enforcing these principles within their duties and responsibilities. This commitment requires that even subjects with whom the Company has relations in any capacity act toward it according to the same rules and values.

Specifically, Intrapak reiterates its belief that acting in some way to the benefit of the company does not justify the adoption of conduct contrary to the aforementioned fundamental principles.

The Company undertakes to ensure that its activities are carried out in compliance with the core values of the Code of Ethics; to this end, it undertakes to:

- take all the necessary measures to promote and disseminate the contents of the Code within its facilities and among its collaborators;
- keep the Code up to date (for the implementation of any organisational, regulatory changes, etc.) and communicate any changes to all recipients in a timely manner;
- monitor compliance with the Code and, where necessary, take action against any violations.



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

PART II: PROTECTION OF HUMAN RESOURCES

The Company believes that human resources are a primary value for achieving objectives, considering the professional contribution made in a relationship based on loyalty, fairness and mutual trust.

Management protects and promotes the value of human resources, encouraging their professional growth, undertaking to avoiding discrimination of all kinds and ensuring equal opportunities, as well as offering working conditions that are respectful of individual dignity and safe and healthy working environments, in compliance with the applicable regulations in force and workers' rights.

The management of human resources is based on respect for the personality and professionalism of each and every resource, within the general framework of the rules herein.

In accordance with the applicable regulations in force, the company considers the following principles as being essential:

1. *Freedom of choice*

Labour is a free choice. Intrapak undertakes not to use forced labour or labour performed in conditions of slavery or servitude.

Each worker is free to terminate their employment upon adequate notice.

2. *Employment relationship*

Intrapak does not permit employment relationships that are not governed by agreed and properly formalised contracts. Special employment relationships shall not be established in order to circumvent their labour and social security obligations.

Remuneration shall not be less than what is required by law or, where applicable and providing greater protection, by industry-specific regulations.



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

Employees shall be informed of their economic employment conditions before recruitment and during the course of employment.

Working hours shall comply with national laws or, where they offer greater protection, with industry-specific regulations. Overtime hours and their remuneration shall be in accordance with national laws, regulations and bilateral agreements.

Working hours shall not exceed the weekly hours laid down by national law, including overtime, unless operational circumstances require a temporary increase in the number of working hours. Under normal circumstances, at least one day of rest shall be guaranteed for each seven-day period.

The Company also undertakes not to use workers without a valid residence permit and not to use forced labour or labour performed in conditions of slavery or servitude;

3. Health and Safety

The Company undertakes to disseminate and consolidate a culture of safety, developing awareness of risks and promoting responsible conduct on the part of all collaborators; in addition, it shall work towards preserving occupational health and safety, especially with preventive actions.

It shall take appropriate measures to prevent the risks of accidents and health hazards occurring in the course of, arising from, or related to work through an integrated risk management system, continuous risk analysis and, more generally, in accordance with the provisions of the applicable regulations in force.

Employees shall receive regular and documented occupational health and safety training. This training shall be repeated for new recruits and in the event of a department change.

The Company assigns responsibility for occupational health and safety to the Managing Director.



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

4. *Child labour*

The Company is committed to preventing the exploitation of child labour. For this reason, people under the legal minimum age for access to employment shall not be recruited.

5. *Trade union freedoms*

Employees, without distinction, have freedom of association. The company ensures freedom of association and the actual exercise of the right to trade union bargaining.

Where association and collective bargaining are prohibited by law, the company undertakes to ensure this right can be exercised by parallel means.

6. *Work environment*

For Management, maintaining a positive working environment is a priority, aimed to achieve maximum mutual cooperation and teamwork, to share objectives, where every individual can express their potential, free from any conditioning or any form of intimidation.

The Company undertakes to enhance and develop professional skills according to the principle of equal opportunities, meritocracy and in any case in line with the Company's strategic choices, organisational and production needs. The relationship between the company and its human resources is based on trust and collaboration.

In the evolution of the employment relationship, the Company undertakes to create and maintain the necessary conditions so that the skills and knowledge of each individual resource can be expanded as necessary for the performance of the assigned activities, following a policy based on the recognition of merit and equal opportunities and providing for specific schemes aimed at professional training and the acquisition of additional skills. Specifically, the Company is against discrimination in recruitment, remuneration, training, advancement, dismissal or retirement on the basis of race, caste, country of origin, religion, age, sex, marital status, sexual orientation, disability, trade union or political party membership.



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

The Company undertakes to create a positive working environment, based on the principles of fairness in interpersonal relations, which guarantees conditions that respect personal dignity for all those who interact with the Company in any capacity, and where the characteristics of individuals cannot give rise to discrimination or conditioning.

The Company also requires all its collaborators not to give rise to harassment of any kind in their internal and external employment relations, including for instance creating a work environment that is hostile to individual workers or groups of workers, creating obstacles and impediments to the professional prospects of others, mistreatment, sexual harassment, psychological abuse and pressure, intimidation, verbal abuse, etc.

Retaliatory disciplinary measures, physical abuse, threats of physical abuse, sexual or other torment, verbal abuse, and other forms of intimidation are prohibited.

7. Confidentiality of personal data

The Company undertakes to protect the privacy and opinions of each of its collaborators and, more generally, those who interact with the Company. The Company also complies with personal data protection regulations and implements appropriate organisational and technical measures to ensure the security of the personal data processed.



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

PART III: COMPANY RULES OF CONDUCT

1. Statutory knowledge and compliance

The Company considers knowledge and application of the disciplines governing its activities, and compliance with applicable laws, regulations and contracts, as well as with the provisions of this Code and with other corporate legal provisions, to be an essential part of the fiduciary relationship with its collaborators.

Honesty, loyalty, ability, professionalism, reliability, technical preparation and dedication of Personnel are some of the essential conditions to achieve the company's objectives and constitute the characteristics the Company demands of its Collaborators.

Each Collaborator undertakes from the time of recruitment to comply with the Code of Ethics and to behave in a manner that is based on the principles of loyalty, impartiality, integrity and honesty. Each Collaborator shall avoid any act or conduct that violates or could cause the legal, regulatory, contractual or corporate provisions or those contained in the Code of Ethics to be considered violated.

Each Collaborator shall operate impartially, avoiding favouritism and discrimination, refraining from putting others under undue pressure and shall reject it, taking initiatives and making decisions with the utmost transparency, and shall avoid creating or enjoying privileged situations.

Each Collaborator undertakes to ensure that workplace conduct and relationships between Collaborators at all levels are always mutually fair and that relationships with colleagues are inspired by respect, harmony and a spirit of collaboration, avoiding acts, conduct and language marked by animosity or conflict.

In addition, the Company will not tolerate conduct that may be construed as abusing a position of authority, including, but not limited to, requesting, as an act owed to an immediate superior, personal services, favours, or any conduct that constitutes a violation of this Code.



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

Each Collaborator shall refrain from working under the influence of alcohol or drugs or substances having a similar effect and from consuming such substances in the course of their duties.

2. Diligence and good faith

Each Company Collaborator shall act fairly and in good faith, respecting the obligations entered into in the employment contract and delivering the required services diligently.

3. Confidentiality obligations

Each Collaborator may, in the performance of their duties, become directly or indirectly aware of confidential information concerning the company in which they operate, its activities, its products, its processes, its operational and strategic projects, its data, and more generally its know-how.

All this information, while not being an exhaustive list but merely an explanatory one, constitutes an invaluable asset that each Collaborator is obliged to preserve, respecting professional secrecy and keeping information and details learned in the performance of their duties as confidential.

Therefore, each Collaborator shall refrain from disclosing any information concerning the Company.

Each Collaborator shall consult only the information they are entitled to access and make use of it in accordance with their duties, granting access to it only to those entitled to do so and in accordance with the provisions of the applicable internal regulations in force.

Information is handled in a manner that ensures compliance with the applicable privacy laws in force and in accordance with existing internal procedures: specifically, the information may not be communicated to third parties inside or outside the Company, unless such communication is necessary for the performance of their duties or is requested by the competent authorities in the context of official investigations.

Each Collaborator shall prevent any data leakage and shall take all necessary precautions to prevent the disclosure of confidential information by undertaking to:



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

- collect only data which they have been expressly authorised to collect;
- avoid making unnecessary copies thereof;
- store them in locked physical file cabinets or in suitably secured computer files;
- ensure that this information is not left unattended and accessible to others (e.g. by leaving copies in the photocopier or on their desk during their absence, ensuring that all documentation has been collected at the end of work meetings, ...);
- treat confidential topics discretely in the workplace, ensuring that the persons involved in addressing the topics are authorised to do so;
- ask external recipients of company information to keep it confidential.

Furthermore, each Collaborator shall refrain from using information not available to the public or not made public, including information obtained in confidence in the course of their job, for the purpose of obtaining profit or private interests.

4. Company assets provided

The assets provided to Collaborators for the performance of their duties form part of the company assets.

Each Collaborator shall comply with the criteria of diligence, fairness, cost-effectiveness, efficiency and effectiveness in their activities and the use of assets belonging to the company. They shall therefore use the company's materials, work tools and assets with the utmost care and in accordance with these principles.

Each Collaborator is responsible for the protection of the assets they have been entrusted with and is called upon to adopt conduct that ensures the protection of Company assets, avoiding misuse, reporting risks that threaten their integrity, and immediately reporting any damage, loss or theft to the competent internal departments. Use shall comply with the safety procedures and the rules/regulations in place implemented by their Company.

5. Access to procedures and systems

Particular attention shall be paid to the correct use of IT systems and the data contained therein, which are a fundamental component of the company's assets. The security of company data is primarily the responsibility of the individual user.



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

The use of computers and access to IT procedures must be in accordance with the applicable current internal regulations and procedures in force, and in any case for work purposes only; in particular, the password to company IT systems is strictly personal and may not be disclosed to third parties.

The computerised processing of information shall be subject to the security controls necessary to safeguard the company from undue intrusion or unlawful use, in accordance with the applicable legislation. Collaborators shall adhere strictly to the applicable company policies and procedures in force, in particular those relating to the use of computer devices, passwords and USB flash drives.

The destruction of the material or electronic media containing the information shall take place in accordance with the procedures governing the subject matter and within the limits envisaged by law.

6. Use of means of telecommunication

Communication systems, such as telephones, e-mail and the Internet, are also company assets and are therefore only allowed to be used for work purposes.

Each Collaborator with access to means of telecommunication provided by the Company shall use verbal and written language in accordance with the principles of the Code of Ethics.

Each Collaborator with access to e-mail and the Internet shall use these tools for work purposes only, in compliance with the applicable company regulations in force, with content that is consistent with the principles and values expressed in the Code of Ethics. This is because any message or information transmitted via e-mail and/or the Internet is a statement attributable to the Company. All information entered into the computer system shall be the property of the company.

In order to protect the company assets, it should be noted in particular that the reproduction and duplication of software material is strictly prohibited. Failure to comply with this prohibition exposes the company, and the Collaborator in person, to the risk of serious penalties.



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

7. Conflict of interests

There is a relationship of trust between the Company and its Collaborators, whereby it is the primary duty of each party to use Company assets and make decisions in the company's interest, in accordance with the principles set out in the Code.

In this perspective, each Collaborator shall avoid any conflict of interest situation (e.g. a conflict of interest situation may be caused by a friendship with a supplier, a family relationship with a candidate, or a personal interest in a business transaction) and shall refrain from any activity, direct or indirect, that may construe conflict between a personal interest and the interests of the company or that may interfere and hinder the ability to make impartial and objective decisions in the interest of the company.

The occurrence of situations of conflict of interest, in addition to being contrary to legal provisions and to principles set out in this Code, is detrimental to the image and integrity of the company.

Each worker shall notify their immediate superior in writing of specific situations in which they or, to the best of their knowledge, their relatives or relatives or de facto partners, have personal, economic and financial interests that conflict with the interests of the company.

The obligation to avoid situations of conflict of interest should also be understood as extending to consultants and external collaborators of the Company who shall report it in writing to their direct superior or Company contact person.

8. Drawing up financial statements, reports and other company communications envisaged by Law

All transactions and decisions made within the company shall be properly recorded, the result of a precise and formalised decision-making, authorisation and enforcement process, including by electronic means.

Each transaction shall be supported by appropriate documents, so that checks can be carried out at any time to certify the characteristics and reasons for the transaction and to identify the entities who authorised, carried out, recorded and verified the transaction.



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

The accounting records shall be kept in an accurate, complete and timely manner in accordance with the company's accounting procedures in order to provide a true and fair representation of the assets and liabilities, income and financial situation of the business.

To this end, each Collaborator involved in the accounts shall ensure maximum cooperation, completeness and clarity of the information provided, and the accuracy of the data and processing.

Each Collaborator involved in drawing up these deeds is required to check, with due diligence, the correctness of the data and information that will then be received for the preparation of financial statements, reports and other statutory social communications.

Each Collaborator shall also inform their superior in good time of any omissions, serious neglect or falsification of the accounts and/or documentation on which the accounting records are based.

Intrapak complies with tax regulations and adopts tax risk management strategies to ensure that the financial, legal and reputational risks associated with taxation are fully identified and assessed.



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

PART IV: PROTECTING THE ENVIRONMENT

The company undertakes to operate in a manner that respects the environment and public health; business decisions are based on environmental sustainability and sustainable growth. The Company's primary objective is to minimise environmental impacts and optimise the use of energy and natural resources.

All Collaborators shall endeavour to contribute to respecting the environment by complying with legal and internal rules and regulations, directly or indirectly aimed at protecting the environment. Careful use of resources such as water, electricity and gas and consumables is some of the expected conduct on the part of Collaborators in terms of respect for the environment.

1. Procurement of raw materials

The raw materials Intrapak uses must comply with quality, safety, environmental requirements.



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

PART V: EXTERNAL RELATIONS

In its dealings with the outside world, the Company shall align its conduct with the principles of transparency, impartiality, reliability, legality and fairness, reliability, responsibility and quality.

1. Customers

The Company's primary purpose in conducting its business is to protect the Customer's rights. Every Customer or category of Customer is given care and attention, without discrimination.

In dealing with Customers, and generally in external relations in connection with their work, each Collaborator shall align their conduct with the criteria of courtesy, fairness, cooperation and transparency.

All information acquired, whether directly or indirectly, concerning Customers is used and stored with care to ensure the utmost confidentiality. Intrapak undertakes to offer the highest quality products and services. Customer relationships shall be documented in order to maintain traceability of the characteristics and requirements of the business relationship.

Any complaints shall be dealt with promptly and thoroughly through appropriate assessment and handling mechanisms. If the complaints prove to be well founded, the competent authorities shall promptly identify appropriate solutions for the settlement of the dispute.

2. Suppliers

The Company promotes and conducts a careful policy in the selection of its suppliers, creating relationships that lead to value creation. Relationships with Suppliers shall be managed in accordance with the principles of fairness and impartiality and in accordance with internal procedures and delegated powers.

The choice of suppliers and the purchase of goods and services shall be made on the basis of objective assessments of competitiveness, quality, cost-effectiveness, safety and sustainability. The Supplier selection process shall also take into



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

account their appreciation on the market, their ability to meet the applicable regulatory obligations and whether they have Quality Certifications.

It is contrary to the principles of this Code to engage in relationships with persons related to criminal organisations. Any anomalies should be promptly reported to an immediate superior and, in the event of a suspected offence, to the internal control department.

3. Public Administrations and Trade Unions

Institutional relations with Public Administrations, where Public Administration is to be understood as any public body, independent administrative agency, person - natural or legal - acting as a public official or in charge of a public service, shall be reserved for the purpose-devised competent Company departments and for those who have been specifically appointed to do so.

The departments and subjects responsible for interacting with Public Administrations shall be inspired by and shall adapt their conduct in respect of the impartiality to which the Public Administration is bound.

Specifically, institutional relations with Authorities and Public bodies aimed at the representation and protection of the Company's interests shall be exercised in a transparent and rigorous manner, avoiding any attitude which could be construed as an attempt to influence improperly and/or unduly the activities and opinions of the same Authorities.

Collaborators shall act in accordance with Laws, Regulations and procedures, in other words fairly and loyally, without improperly influencing the decisions of the other party in any way in order to obtain favourable treatment.

All relations with Public Administrations shall be documented and traceable. It is forbidden to offer money or gifts to Directors, Officers, or Public Administration Employees or their relatives, including through intermediaries or representatives.



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

4. Local Community

Intrapak strives to improve the quality of life and the socio-economic situation of the local communities in which it operates while respecting local skills and cultural rights.

5. Competition

The Company believes in the value of free competition as a fundamental tool for Consumer protection and competition development. To this end, the Company undertakes to act as fairly as possible and in full respect of its competitors.

Intrapak requires all collaborators to abide by the applicable rules in force and to refrain from any unfair business practices that could constitute a violation of competition rules.

6. Bribery, Gifts and Illegal business activities

The Company does not tolerate bribery or corruption of any kind to any government official, customer, supplier or any other party. For this reason, Collaborators are expressly prohibited from giving or receiving gifts, freebies and/or benefits to or from anyone that could be construed as exceeding normal business or courtesy practices, or construed as being intended to obtain favourable or beneficial treatment in the conduct of any business activity.

If a Collaborator receives offers and/or requests for gifts or benefits, they shall inform their direct superior who shall evaluate the guidelines and parameters to be adopted. The direct superior shall inform Management, who is responsible for recording the offer and/or request of gifts or benefits. For any queries, collaborators may contact the reference internal control department.

The Company also requires that all Collaborators undertake not to engage in activities that could result in money laundering or criminal activity.



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

7. Protecting the image of the company and intellectual and industrial property

The good reputation and image of the Company are an essential intangible asset. All the work activities of those who work for the Company are carried out with professional commitment, moral rigour and fair management, also in order to protect the reputation and image of the Company.

The Company undertakes to respect the intellectual property rights of third parties and requires collaborators to refrain from any conduct that could infringe such rights (trademarks, designs and models, utility models, patents, copyrights).

INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

PART VI: INTERNAL ORGANISATION

1. Company organisation principles

Any operation and/or transaction, in the broadest sense of the term, shall not only be legitimate but also authorised, documented, recorded and at any time verifiable.

To this end:

- business procedures shall be established in accordance with the applicable regulations in force at the time and shall be such as to allow checks to be carried out on the characteristics of each transaction, the reasons for its execution, the authorisations to carry out the transaction and the execution of the transaction;
- each Collaborator shall conduct their work on the basis of managerial principles, which enable them to:
 - take responsibility for their role;
 - know how to identify priorities;
 - promote the professional development of Collaborators;
 - develop initiative and technical skills;
 - gain a strategic view of the business, engaging Collaborators in the process.
- each company department and each person responsible for it shall be responsible for the veracity and authenticity of the documentation and information provided in the course of the business for which they are responsible.

2. Internal control system

The company shall adopt an organisation aimed at sound and prudent management, combining the economic-financial balance and efficiency of the company with conscious risk-taking and fair business conduct in accordance with legal requirements.

To this end, the Company has established rules, procedures and organisational structures that aim to ensure that the Company's objectives are met and that the following objectives are achieved:

- to assess the adequacy of the company processes in terms of efficiency, efficacy and cost-effectiveness;
- to ensure the reliability and correctness of the accounts and the safeguarding of company assets;
- to ensure compliance of operational obligations with internal and external regulations and with company directives and guidelines aimed at ensuring sound and efficient management.



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

PART VII: THE CODE OF ETHICS WITHIN THE COMPANY

The Code of Ethics is available for consultation on the website and on the company's internal network.

All Company personnel are required to reflect deeply on the principles and values referred to in this Code of Ethics: personal compliance with it will contribute, among other things, to the spontaneous compliance with the applicable Laws and regulations in force.

Collaborators are obliged to:

- refrain from conduct contrary to these principles, content and procedures;
- carefully recruit, to the extent appropriate, their own collaborators and instruct them to comply with the Code,
- request that third parties with whom Intrapak has a relationship confirm that they are aware of the Code;
- promptly report to their direct superiors possible cases or requests for violations of the Code and the Model;
- cooperate with the departments entrusted with the specific procedures in the verification of possible violations;
- take immediate corrective action when required by the situation and, in any case, prevent any kind of retaliation.

1. Monitoring the implementation of the Code of Ethics

Supervision of the implementation of the Code of Ethics and its application is the responsibility of company management.

It is the responsibility of Management to promote the dissemination of the principles contained therein, to provide clarifications and to promote proposals for the supplementation or amendment of its contents in order to adapt them to any relevant new legislation and changes in civil sensitivity.



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

2. Reports

Each collaborator shall report any significant violations of the Code of Ethics to their immediate superior.

These reports shall be detailed and written in great detail, providing all the useful elements (general information, facts, times, places, etc.) to allow the internal control department to carry out the necessary and appropriate checks and investigations to verify the facts reported.

It should be noted that these reports shall not include personal grievances or claims or demands that fall within the scope of the employment relationship or the relationship with superiors or colleagues. The report shall be handled by the relevant internal departments in accordance with the applicable regulations in force and according to Intrapak's reporting policy and process.

The Company prohibits retaliatory actions, retaliation, discrimination against the reporting person and/or persons bound by them and takes appropriate and suitable protective measures to protect the reporting person and/or persons bound by them.

If the reporting person has a reasonable suspicion of being retaliated against as a direct result of the report, they may contact their superior directly, who will maintain confidentiality or, if the communication is anonymous, anonymity of the identity of the reporting person. Except in cases where liability for slander or defamation can be established, and in cases where anonymity is not legally enforceable, management will protect the identity of the reporting person in any subsequent context, and the same will not be revealed without their express consent.

Once the report has been verified and any liability for slander or defamation has been excluded, if the report proves to be founded, the manager shall promptly inform the Company Board of Directors so that appropriate decisions can be taken.

3. Penalties and contractual value of the Code of Ethics

Compliance with the rules of this Code is an essential part of the contractual obligations of all Collaborators.



INTRAPAK S.p.A.

Via Valsorda snc - 22044 Inverigo (CO) Italia

Tel. +39.031.5621650

Cod. Fisc. 00851110155 - P.iva IT00697360964

Reg. Impr. 00851110155 - R.E.A. CO 333853

Cap. Soc. € 1.000.000,00 i.v.

Sito web: www.intrapak.it - E-mail: intrapakspa@intrapak.it

Pec mail: intrapakspa@pec.intrapak.it

Failure to comply with the principles contained in the Code of Ethics may become relevant for disciplinary purposes and may be subject to sanctions, in accordance with legal and contractual regulations in force applicable at the time.

In this respect, the Company reserves the right to take any action under any order and jurisdiction deemed appropriate to safeguard company interests, including the right to demand compensation for damages, including image damages.

4. Approval

This Code of Ethics is approved by resolution of the Company's Board of Directors.

First edition – 2023.09.11

Compiler: Matteo Pedretti

Department: Company

Signature

A handwritten signature in black ink, appearing to read "Matteo Pedretti", written over the printed word "Signature".