

The purpose of this policy is to indicate the principles that Scatolificio Niccoli intends to comply with in order to avoid any type of conflict of interest that may negatively affect the interests of the company and its stakeholders, and to provide a framework to prevent any type of corrupt behaviour in contrast with the Code of Ethics and the applicable mandatory requirements.

Scatolificio Niccoli promotes a culture of integrity and transparency, encouraging employees to report any concerns related to conflicts of interest and corrupt behavior, while constantly working to mitigate risks and maintain stakeholder trust.

A conflict of interest occurs when an individual's self-interest conflicts with the interests of the company, affecting the ability to make unbiased and objective decisions in the interest of the company; therefore, in order to avoid any element that could constitute a conflict of interest, the Management of Scatolificio Niccoli acts in compliance with the following principles:

- Assess, during the selection and recruitment of personnel, the absence of conflict of interest between the candidate and the company in the performance of the tasks to be assigned;
- Sensitize staff to report any situation that could be interpreted as a potential conflict of interest;
- Take immediate action in the event that incompatibility of personnel with the assigned tasks is identified that may generate situations of conflict of interest;

Senior managers and/or top management must set an example of ethical and transparent behaviour, avoiding situations that may also generate the appearance of a conflict of interest, within the scope of their responsibilities and duties.

With regard to the aspects relating to anti-corruption practices, Scatolificio Niccoli sets out the following principles:

- No tolerance for any form of corruption (e.g. illicit payments, bribes, favoritism or other activities that may compromise the integrity and reputation of the company);
- All employees must comply with the anti-bribery laws and regulations applicable in the countries in which we operate. Violation of such laws will constitute a violation of this policy;
- All transactions must be accurately documented and recorded transparently in our accounting records. Recording bogus transactions or using hidden accounts is not allowed;
- The company is committed to conducting thorough audits before engaging with new business partners and suppliers, ensuring that they comply with the same ethical and anti-corruption standards that we expect from our employees;
- Employees must not accept or offer gifts, favors, or other benefits that may compromise the objectivity of business decisions.

To ensure compliance with the principles set out above, the Management of the Box Factory considers it essential to train employees and managerial roles, in order to convey sensitivity and awareness to avoid any situation of conflict of interest and corrupt behavior and to inform them on the methods to be adopted for reporting events that contrast with these principles.

Violation of this policy may result in disciplinary action, including suspension, termination, and, if necessary, legal action.

This policy will be subject to periodic review to ensure its effectiveness and adequacy with evolving regulations and company needs and will be communicated to all employees and



POLICY ON THE MANAGEMENT OF CONFLICTS OF INTEREST AND ANTI-CORRUPTION

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external stakeholders in the manner deemed most effective by the Management, including through publication on the company website.

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The Management

