



Scatolificio Niccoli s.a.s.

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CODE OF ETHICS

Rev. 00

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1. PREMISE

SCATOLIFICIO NICCOLI considers it essential to establish and maintain positive relationships with workers, collaborators, customers, suppliers, managers and directors involved in business processes, maintaining and developing relationships based on the utmost mutual trust, operating in compliance with national and international laws and regulations.

We are committed to combating all forms of discrimination based on gender, ethnicity, culture, personal and social conditions, religious and political beliefs, and to adopt production practices that minimize the environmental impact of our activities.

This Code of Ethics sets out the values we pursue and that we have disseminated to interested parties over the years, including through the publication of our company policies. We are aware of our role as a socially responsible company, which must inspire confidence and positivity in the community and society at large.

The Code of Ethics integrates the rules of conduct established by the legislator: although compliance with the law is fundamental, it is not always enough, therefore, we require that all business decisions and the daily behavior of staff be guided by ethical principles, even when they are not required by law.

2. ABOUT US

SCATOLIFICIO NICCOLI is committed to the design and production of boxes for food and non-food packaging, customizable in terms of shape, size and aesthetics, responding to the specific needs of customers with quality controlled products and in compliance with national and international regulations, including environmental ones. The production activity is carried out with constant monitoring and improvement of environmental, economic, social, health and safety aspects at work.

This commitment allows us to be an economic pillar for the territory and a reliable partner for the world's leading brands in the classic and safety footwear sector, as well as the food sector specializing in date boxes.

Our continuous search for product and process improvement has led us over the years to invest in new technologies and in the computerized organization and management of processes. We have promoted the development of the skills and knowledge of our workers, collaborators and partners, creating an environment characterized by trust and mutual respect. This forms the foundation of a socially responsible company.

3. GENERAL PRINCIPLES

To achieve our goals, we adhere to the following principles:

- compliance with all applicable laws and regulations, both national and international.
- respect for people.
- promotion of equality and impartiality.
- practices based on honesty, transparency and reliability.
- Guarantee of confidentiality.
- demonstration of loyalty, fairness and good faith.
- commitment to the protection of the environment and the territory.
- Prioritising the protection of health and safety at work

- respect for competition as an indispensable tool for the development of the economic system.

4. RECIPIENTS

The provisions of this Code of Ethics are binding on all of the following:

- Administrator
- Members
- Executives
- Employees and external collaborators, as well as all those who have relationships, even temporary, with the company, such as subcontractors and suppliers
- Customers and all those with whom work activities and business relationships are undertaken in the context of the development, production, promotion, distribution and sale of products.

Recipients of the Code of Ethics are required to:

- refrain from conduct contrary to the provisions of the Code and to require compliance with them.
- contact their superiors or the competent departments for clarification on how to apply the provisions of the Code, when necessary.
- promptly report to superiors or competent departments any acts or conduct contrary to the law and/or the provisions of the Code, of which they may be aware.

5. COMMUNICATION, IMPLEMENTATION AND CONTROL

SCATOLIFICIO NICCOLI to disseminate and enforce this Code to all Recipients in various ways:

- Publication of the Code on its website.
- Direct communications to stakeholders.
- Inclusion of the Code as an integral part of supply contracts with suppliers and of the rules for their evaluation and selection.
- Periodic monitoring and/or on-site audit activities.

The Management of SCATOLIFICIO NICCOLI guarantees:

- The dissemination of the Code among employees, external collaborators, suppliers, partners and all other interested third parties.
- Support in the interpretation and implementation of the Code.
- Application and compliance with the Code of Ethics and organizational, management and control models.
- Taking all necessary steps in the event of violations of the rules set out in the Code.
- Updating of the provisions of the Code according to the needs that arise over time.

6. FAIRNESS, HONESTY AND ETHICS, TRANSPARENCY, CONFIDENTIALITY

Any action taken by the above-mentioned Recipients must be in line with the mission and values expressed in this Code of Ethics for the protection of SCATOLIFICIO NICCOLI, in compliance with national and international laws, general principles and regulations in force.

Under no circumstances can the pursuit of the Company's interests justify conduct contrary to the ethical values set out herein and, in particular, not in accordance with the law.

Fairness, honesty and ethics must guide all Recipients, regardless of the nature and duration of the employment contract, in business relationships and daily actions. It is essential to operate with maximum transparency and fairness, as defined by the standards of the Code, avoiding misleading conduct to obtain illicit advantages.

The Recipients are responsible for the preservation of the Company's tangible assets and resources assigned to them for the performance of their duties. They must not use the Company's resources for personal purposes nor accept or make pressures or reports that may compromise the Company's reputation or gain improper advantages for themselves or third parties.

SCATOLIFICIO NICCOLI implements preventive measures to prevent corruption and conflicts of interest, preventing employees and collaborators from accepting benefits and favors offered by people with whom they have business relationships. Money laundering and any operation that aims to conceal money or assets from illegal activities is prohibited.

All Recipients must comply with anti-money laundering regulations and pay attention to the requirements of moral integrity and reliability of commercial counterparties, reporting any suspicious conduct to the General Management.

The principle of transparency involves providing clear, complete and periodic information both inside and outside the company, including the correct communication of financial results.

The confidentiality of information is a fundamental principle that must be respected by all parties, both during and after the employment relationship, ensuring compliance with privacy legislation and the correct handling of personal data.

It is forbidden to intervene illegally on computer systems in order to obtain unfair advantages or damage the State or a Public Body.

7. SUPPLIER RELATIONS

SCATOLIFICIO NICCOLI undertakes to conduct its relations with customers, suppliers and partners in accordance with the principles set out in this Code of Ethics, promoting a continuous, courteous and helpful dialogue, based on mutual fairness and full compliance with the established contractual conditions.

The initial selection, annual monitoring and periodic requalification of suppliers are carried out through a specially developed internal procedure. This process evaluates criteria such as value for money, reliability, compliance with laws and regulations, environmental protection and respect for human rights. Suppliers who demonstrate compliance with the established criteria or who actively collaborate in their improvement are positively evaluated every year.

Preference is given to paper and board suppliers who adopt sustainable practices in the management of raw materials, preferring cellulose from responsibly managed forests or controlled sources, as well as recycled materials.

Payment management is organized so that suppliers can meet their financial obligations in a timely manner, which is an additional sign of mutual trust.

Prices are determined by considering various factors, including the quantity, type of product, required delivery time and mode, and other customer-specific requirements.

8. CUSTOMER RELATIONS

The primary purpose of SCATOLIFICIO NICCOLI is to meet the current and future demands of customers and interested parties, ensuring a constant dialogue with them and managing risks and opportunities in the reference context.

For this reason, we ask workers, suppliers, contractors and collaborators to constantly strive to:

- Produce high-quality packaging boxes, customized according to specific needs, in compliance with national and international regulations, including environmental ones.
- Ensure continuous improvement of products and services to customers through the reduction of defects and non-conformities, the responsible and procedural execution of tasks by all staff and the constant control of the activities carried out.

Each product or solution supplied to the customer must be tested in advance and must meet the reliability and safety characteristics agreed upon during the contracting or design phase; otherwise, the replacement will be paid for by the company.

Packaging products manufactured must be safe and risk-free for both customers and end consumers; In addition, instructions for proper disposal at the end of their useful life must be clearly indicated on the packaging.

9. VALUE OF HUMAN RESOURCES

The management of employment and collaboration relationships is based on respect for workers' rights and the enhancement of their professionalism at SCATOLIFICIO NICCOLI.

The company undertakes to ensure that its employees and collaborators are suitable and professionally qualified for the tasks assigned. To this end, the growth and development of human resources is promoted through training and retraining initiatives, based on individual skills, attitudes and abilities, without discrimination of any kind.

SCATOLIFICIO NICCOLI believes that transparent and correct management of its human assets is essential and is committed to raising awareness among the Management, suppliers, employees and external collaborators on compliance with the principles of Social Responsibility, committing itself to:

- Do not use child or forced labor
- Comply with current national legislation, international conventions and recommendations, including those of the ILO (International Labour Organization) and the UN (United Nations Organization)
- Ensuring freedom of association and the right to collective bargaining
- Combat any form of discrimination and unequal treatment based on ethnicity, nationality, religion, disability, gender, sexual orientation, trade union or political affiliation
- Involve and sensitize workers to respect and implement the above principles during their daily interactions
- Condemn any illegal conduct that may undermine the dignity or physical and/or moral integrity
- Foster dialogue and encourage workers to communicate ideas and proposals for improvement.

SCATOLIFICIO NICCOLI applies the national collective bargaining agreement to all employees in a complete and impartial manner, paying the established salary on time and paying all the related social security, welfare and insurance contributions.

In addition, it undertakes to ensure the protection of maternity and paternity, as well as disadvantaged people, and to promote and improve the safety and physical and mental well-being of its employees. SCATOLIFICIO NICCOLI also involves suppliers of goods and services in compliance with the principles of social responsibility.

The professional growth of employees is fostered through the implementation of training plans and the use of tools adapted to the company's needs, based on merit and ensuring equal opportunities for all. Each worker/collaborator is required to acquire knowledge of the laws and

regulations relating to his or her duties and to act in accordance with them to protect the good name of the company.

SCATOLIFICIO NICCOLI actively contributes to the expansion of employment and training opportunities for young people within the economic and social context, stipulating professional apprenticeship contracts, activating training internships at its headquarters and promoting the inclusion of personnel with disabilities.

10. USE OF COMPANY VEHICLES AND TOOLS

With reference to company infrastructures, plants, materials, vehicles, tools, machines and equipment, as well as company IT systems, each employee/collaborator is required to ensure maximum compliance with them and to promptly report to the relevant departments any threats or harmful events to the company or its assets, deriving from the improper use of such resources by others.

In particular, each employee/collaborator is required to:

- Use the company's assets exclusively for purposes related to the exercise of the work activity.
- Avoid misuse that may cause additional costs, damage, or reduced efficiency.
- Always operate in full compliance with the law, internal procedures and this Code of Ethics in order to prevent damage to property, people or the environment.
- Refrain from granting company assets to third parties, even temporarily.
- Help reduce the risk of theft, damage, or other threats to the assets and resources assigned to conduct your business.

11. ENVIRONMENTAL PROTECTION AND SUSTAINABLE DEVELOPMENT

SCATOLIFICIO NICCOLI is actively committed to preserving the environment and preventing pollution through the following actions:

- It introduces products to the market with reduced environmental impact throughout the entire life cycle, including production, transport, use and disposal.
- It promotes a more rational use of energy and encourages the use of renewable energy sources.
- It reduces the impacts related to deforestation by preferring the use of paper, cardboard and adhesives from FSC-certified sources.
- It carries out a complete separation of company waste to promote recycling and recovery.
- It reduces polluting emissions and the consumption of fuels and energy through the use of efficient means of transport and machinery subject to strict controls.
- Monitor and evaluate solutions to reduce greenhouse gas emissions related to business processes.
- It predominantly uses inks, glues and adhesives of vegetable origin rather than chemical.
- It promotes the purchase of raw materials certified and guaranteed by the chain of custody, following sustainable procurement policies.
- It monitors the consumption of drinking water and promotes conscious use, prohibiting the pollution of company wastewater.

12. HEALTH & SAFETY

SCATOLIFICIO NICCOLI considers the safety and health of its workers and external collaborators as an integral part of the company's management, processes and activities. The main objective is to prevent risks and minimise occupational accidents and illnesses at all company locations.

To ensure this, SCATOLIFICIO NICCOLI is committed to:

- Comply with applicable occupational health and safety laws, rules, regulations, and other requirements.
- Promote the culture of safety and prevention through awareness-raising and training activities also aimed at external collaborators.
- Maintain safe and healthy working conditions, with the involvement and consultation of workers and the availability of the necessary resources.
- Encourage the use of procedures and processes to prevent and reduce risks.
- Design and build new plants and modify processes only after an adequate risk analysis.
- Disseminate health and safety objectives and programs, harmonized with those of the organization and periodically verified.
- Guarantee workers the rights provided for by Italian law and international regulations.
- Ensure adequate safety standards for machinery and work equipment.
- Eliminate or reduce any risk to the safety and health of workers.
- Maintain internal supervisory systems to ensure compliance with company regulations and procedures.
- Ensure ergonomic and healthy features in the workplace.
- Prohibit smoking in accordance with the law in all business environments.
- Encourage dialogue with workers to identify new risk factors and ideas to improve working conditions.
- Ensure that the development of the company's activities is sustainable and compatible with the health and safety of workers.

Workers and collaborators of SCATOLIFICIO NICCOLI must:

- Comply with company procedures and perform tasks in accordance with the training received.
- Take care of your own and others' health and safety in the workplace.
- Contribute to the fulfilment of occupational health and safety obligations.
- Follow the instructions given by the employer for individual and collective protection.
- Properly use equipment, hazardous substances, and safety devices.
- Report any hazards or hazardous conditions to your employer.
- Participate in education and training programs.
- Undergo the health checks required by law.

13. SUSTAINABILITY

SCATOLIFICIO NICCOLI is committed to strengthening the company's policies and strategies to transform the company into an increasingly sustainable reality, integrating economic, social and environmental value in a balanced way.

The main objective is to develop long-lasting and trusted collaborative relationships with our Recipients in order to foster a climate of trust and consolidate our reputation for reliability.

14. VIOLATIONS OF THE CODE OF ETHICS

Compliance with the Code of Ethics is a fundamental element of the contractual responsibilities of employees and non-subordinate collaborators and/or parties involved in business relations with the company. Any violation of the rules of the Code of Ethics may constitute a breach of contractual obligations.

The maintenance of these principles will be ensured through the implementation of internal rules and the collection of monitored and compared data using appropriate indicators.

Managers and heads of corporate functions, in particular, are required to supervise with the utmost attention and diligence all other subjects, direct and indirect, over whom they exercise hierarchical authority. They must also report to the General Management any irregularities, violations or deficiencies found in the principles established in this Code of Ethics.

15. REPORTS

Fostering an environment where anyone can report potential violations of our Code of Ethics is a key priority for our company. We have therefore put in place a structured and accessible system of communication channels and tools to facilitate these reports.

We believe that it is the responsibility of all Recipients of our Code, i.e. every individual involved in our activities, to promptly report any alleged violations of the Code of Ethics. To make this process as smooth as possible, we have established the following communication channels:

- Reporting box available to employees and all those who access our premises inside the coffee break area
- Reports via our inbox ESG@scatolificioniccoli.it

It is important to emphasize that all reports will be treated with the utmost confidentiality and transparency, following a predefined procedure. This means that the identity of the whistleblower and the information transmitted will be treated confidentially and protected from any form of unauthorised disclosure. However, it is essential to comply with legal obligations and ensure that the rights of those involved in reports are protected, particularly when such reports turn out to be erroneous or malicious.

The Company adopts a zero-tolerance policy towards any form of retaliation, discrimination or penalization against those who report in good faith. We want to ensure a safe and open environment where anyone with information about possible ethical violations can feel free to share it without fear of negative consequences for their person.

16. FINAL PROVISIONS

This Code was ratified in FEBRUARY 2024. Any changes and/or additions to the same will be subject to the approval of the Administrator and promptly communicated to all Recipients

Firm and Letterhead

Sole Director