

CODE OF ETHICS OF CREALIS S.P.A.

Introduction

Crealis S.p.A. (hereinafter also referred to as "Crealis" or the "Company") is a *leading* company in the processing of plastics and aluminum laminates, as well as in the production of caps, capsules and guarantee closures for the most well-known brands in the world of wine, sparkling wine, spirits, oil and vinegar. The Company also offers state-of-the-art technical and aesthetic solutions capable of meeting the quality and customization demands of customers in the wine industry and related realities.

The Company, assuming integrity, fairness and legality as the guiding principles of its activities, guarantees in the conduct of its business compliance with the law, internal regulations and those in force in the countries of reference.

The Company aims to reconcile the pursuit of market competitiveness with compliance with competition regulations and to promote the proper and conscious use of resources with a view to social responsibility.

To this end, Crealis has decided to adopt this code of ethics (hereinafter the "**Code**"), aimed at establishing the norms and principles guiding its conduct in both its internal and external relations.

1. Target audience and scope

The provisions of the Code apply, without exception, to all employees, directors and collaborators of the Company and to all those who, directly or indirectly, permanently or temporarily, establish relationships and relations with them or collaborate with them to pursue their objectives (hereinafter the "**Recipients**").

Recipients are required to conform their conduct to the principles set forth in this Code, must promptly and adequately inform third parties of the obligations imposed and provided for in the Code, and require compliance with them.

2. Principles of ethics and behavior

2.1 Loyalty and transparency

In accordance with the principles of loyalty and transparency, the Recipients, in carrying out company activities, are prohibited from:

- 1) Carrying out activities contrary to or incompatible with the interests of the Company;
- 2) Spreading news suitable for harming the image and interests of the Company;
- 3) Disclose information or news about the Company to third parties without having obtained prior authorization.

All employees must consider compliance with the rules of the Code as an essential part of contractual obligations within the relationship of trust and loyalty.

2.2 Legality

The Company promotes high *standards* of integrity through honest and ethical management of corporate affairs.

The integrity and reputation of the Company depend on the honesty and impartiality of each Recipient as personal integrity underpins corporate integrity.

The Company is committed to compliance with current and applicable laws and regulations and the provisions of this Code, as well as company *policies* and procedures, and generally accepted practices.

In addition, the Company undertakes to conform its activities to the requirements of Legislative Decree No. 231 of June 8, 2001.

Under no circumstances shall the pursuit of the Company's interest justify and make permissible conduct that conflicts with applicable legal provisions.

The Company ensures the implementation of appropriate training, information and continuous awareness-raising activities for the Recipients, including with regard to the provisions of this Code and their concrete application.

2.3 Equity and the value of the person

The Company recognizes that business success depends on full respect for the rights of the people with whom it interacts and, to that end, ensures their physical and moral integrity.

The Company promotes a supportive work environment that values the diversity of employees and rejects all forms of discrimination, including discrimination based on age, gender, sexual orientation, health status, race, nationality, cultural background, political opinions, religious beliefs, and membership in associations and unions.

The Company prohibits any form of harassment-whether physical, verbal, written or through visual representations-by employees and any third party.

2.4 Diligence and professionalism

The members of the corporate bodies, employees and collaborators are committed to diligently and professionally carry out their activities paying the utmost attention to the constant production of products of excellence.

The Company invests significant resources in research and development in order to ensure:

- The continuous improvement of the quality and efficiency level of products;
- customer satisfaction;
- the economy and durability of the product;
- The highest possible level of environmental compatibility of production.

2.5 Image protection

Adherence to the ethical principles and values set forth in this Code is a fundamental requirement in the creation and maintenance of a good reputation for the Company, as well as a key contributor to the pursuit of the Company's goals and success, fostering relationships with customers, suppliers and the community at large.

Recipients, in complying with the provisions of this Code, contribute to the protection of the Company's image and good reputation.

2.6 Impartiality and management of conflicts of interest

Recipients must avoid situations and/or activities that could lead to conflicts of interest with the Company or that could interfere with their ability to make impartial decisions in safeguarding the Company's best interest.

You are obliged to report to your department head any information that might suggest a situation of potential conflict with the interests of the Company.

2.7 Countering corruption

In relations between the Company and third parties, Recipients must act in accordance with ethical standards and in compliance with applicable regulations. Relationships must be managed without resorting to unlawful means.

Corrupt practices, illegitimate favors, collusive behavior, and solicitation of personal benefits for oneself or others are explicitly prohibited, even if such behavior may result in an advantage, even potential, for the Company.

It is prohibited to accept gifts or personal courtesies from third parties whether customers, suppliers or others, other than those due to normal courtesy and of modest value, however, not exceeding 100.00 Euro.

Giving gifts and acts of commercial courtesy with a value exceeding 100.00 Euro is prohibited, except with the prior approval of the Chief Executive Officer. In any case, it is prohibited to give gifts and acts of commercial courtesy, regardless of their value, in favor of third parties who have expressly notified Crealis that they cannot accept them due to company *policy*.

2.8 Customer focus

The Society considers the customer to be the core of its *business*.

In order to meet customers' demands, the Company is committed to professionalism, punctuality, helpfulness, courtesy, cooperation and high quality standards by offering the highest level of service.

Each Recipient, as part of managing relations with customers and in compliance with company *procedures/policies*, aims to ensure their maximum satisfaction by, among other things, providing comprehensive, truthful and accurate information about the products supplied.

2.9 Confidential information and *privacy* protection

Information that is confidential in nature, relating to data or knowledge belonging to the Company, should not be acquired, used or communicated except by authorized persons.

By way of example and not limitation, the following are confidential information: working plans, sketches (including those prepared according to customer specifications), information regarding *know-how*, operational strategies, employee personal data, lists of suppliers, subcontractors, and collaborators.

In addition, also in compliance with the regulations protecting *privacy*, as well as the measures and steps taken by the Company in order to comply with these regulations, Recipients must undertake to protect the information generated or acquired and to avoid any improper or unauthorized use of it.

Access to third-party information systems, access to which is not freely permitted, for the purpose of retrieving and/or copying information, as well as altering and/or destroying data contained in such systems is prohibited.

2.10 Environmental protection and occupational health and safety

The Company seeks to limit in all ways sources of potential danger to both people and the environment and implements a prudent and reasonable use of resources. In this regard, the production processes, premises and means must correspond to the statutory provisions on occupational health and safety, fire prevention and environmental protection.

The Company strives to implement a high standard of occupational health and safety protection and takes a system approach with the aim of making the entire production chain adequate to this standard.

The Company ensures working conditions that are respectful of individual dignity and mental and physical integrity as well as safe and healthy working environments in compliance with applicable regulations and workers' rights.

The basic principles and criteria guiding the Company's decisions on occupational health and safety are as follows:

- Assessment of all risks and adoption of the following strategy to limit them:
 - Elimination of the root cause (hazard);
 - Limitation of the probability of occurrence (exposure);
 - Reducing the severity of potential accidents;
- the Company pursues the above objectives:
 - Taking into account the degree of technical development;
 - Identifying lower-risk solutions;
 - planning prevention, aiming for a coherent whole that integrates in it technique, work organization, working conditions, social relations and the influence of factors in the work environment;
 - providing appropriate PPE as an additional risk reduction resource, but always after all available collective protection solutions have been adopted;
 - Giving appropriate instructions to workers (training and information).

The Company shall carry out - on a regular basis - the necessary analysis and verification of workplace hazards, updating where necessary precautionary measures, hazard control and appropriate training and education of all employees.

2.11 Protection of corporate assets

Each Recipient is directly and personally responsible for the protection and preservation of the assets-physical and intangible-and resources, whether tangible or intangible, entrusted to him or her to carry out his or her duties as well as for using them in his or her own way and in accordance with the social interest .

None of the assets and resources owned by the Society shall be used for purposes other than those specified by the Society.

Alteration of the operation of the telematics or computer system or the data and information contained therein, installation and use of unauthorized software, and unauthorized duplication of *software* and databases in violation of copyright laws are not permitted in any way.

2.12 Anti-money laundering, tax and customs regulations

The Company ensures compliance with anti-money laundering and counter-terrorist financing obligations arising from both national and international regulations, as well as with laws, regulations and measures of the competent authorities in the field of tax, tax and customs.

Crealis also ensures the transparency of any intercompany transactions.

2.13 Control processes

Recipients should be aware of the existence of *procedures/policies* to guard business processes and aware of their contribution to the achievement of business objectives.

Responsibility for creating an effective internal control system is common to every operational level; consequently, all employees, within the scope of their functions, are responsible for the definition, implementation and proper functioning of the controls inherent in the operational areas entrusted to them.

2.14 Protection of industrial and intellectual property

The Company conducts its business in full compliance with industrial and intellectual property rights legitimately held by third parties, as well as with the laws, regulations and conventions, including those in the EU and/or international sphere, protecting such rights.

In this regard, all Recipients shall respect the legitimate industrial and intellectual property rights of third parties and refrain from unauthorized use, knowing that violation of the same may have negative consequences for the Company.

In particular, Recipients, in the exercise of their activities, must refrain from any conduct that may constitute usurpation of industrial property rights, alteration or counterfeiting of trademarks and/or distinctive signs, or of patents, designs or industrial models, whether domestic or foreign, as well as refrain from marketing or otherwise using or putting into circulation industrial products with counterfeited or altered or mendacious trademarks and/or distinctive signs or made by usurping industrial property rights.

2.15 Respect for fair competition

The Company is committed to complying with competition protection laws in order to promote fair, free and healthy competition and punish unfair and anti-competitive business practices.

2.16 Compliance with the Organization, Management and Control Model

Recipients undertake to abide by the constituent principles of the Organization, Management and Control Model adopted by the Company pursuant to Legislative Decree No. 231/2001, and its implementing *procedures/policies*.

3. Human resource management

3.1 Staff selection and recruitment

The Company recognizes employees and human resources in general as the primary factor for the achievement of its objectives in view of the professional contribution they make, within the framework of a relationship based on loyalty, fairness and mutual trust.

The evaluation of personnel to be hired is carried out on the basis of the correspondence of the candidates' profiles with the company's needs. To this end, the function in charge of selection, within the limits of available information, takes appropriate measures to avoid favoritism, nepotism or forms of patronage in the selection and hiring stages, guaranteeing equal opportunities to all stakeholders.

The information requested is strictly related to the verification of the aspects provided by the professional and psycho-aptitude profile, while respecting the privacy and opinions of the candidate.

The Company prohibits the recruitment and employment of foreign personnel without a residence permit or with an expired residence permit whose renewal has not been applied for within the legal time limits, or with a revoked or cancelled residence permit.

3.2. Employment relationship

The Company does not tolerate any form of forced labor - by which is meant any work or service obtained by a person through coercion or threats or for which the person has not volunteered - and/or irregular labor.

At the time of employment, the Company gives new hires a written employment contract in a language they understand, in which the terms and conditions of employment and the regulatory and pay elements are fully set out. Disciplinary policies and procedures must be clearly defined and promptly communicated to employees.

The Company does not allow the hiring of employees younger than the minimum age of employment established by current regulations.

3.3 Personnel management

The Company ensures all employees and collaborators equal opportunities in employment and career advancement by avoiding any form of discrimination.

The Company ensures compliance with current regulations on working hours, rest periods, weekly rest, mandatory leave and vacations.

The Company pays its employees remuneration such that the worker and his or her family are guaranteed a decent living in compliance with the applicable regulations.

The Company ensures that social security contributions are paid on the basis of applicable regulations and paid regularly.

3.4 Political and labor organizations

The Society does not make contributions to political and labor parties, committees and organizations.

Recipients must recognize that any form of involvement in political activities is on a personal basis, on their own time, at their own expense, and in accordance with applicable laws.

The Company maintains a relationship of cooperation and dialogue with trade unions and trade associations in accordance with the principles of fairness and transparency and the provisions of the law and applicable collective agreements.

4. The cardinal principles in dealing with third parties

4.1. Relations with the Public Administration and Supervisory Authorities

The assumption of commitments and the management of relations with the Public Administration and Supervisory Authorities is reserved exclusively for the corporate functions in charge and authorized in strict compliance with applicable national, European and international laws and regulations.

It is not permitted - not even through an intermediary - to offer money or gifts to managers, officials or employees of the Italian or foreign Public Administration as well as to representatives of Supervisory Authorities or their relatives, whether Italian or from other countries, unless they are goods or utilities of modest value, in any case not exceeding 100.00 Euro.

The Company requires Recipients to offer the utmost helpfulness and cooperation to anyone conducting inspections and audits on behalf of any public entity.

It is forbidden to conceal, destroy or alter records, minutes, accounting entries and any kind of documents, to lie or make false statements to the competent authorities.

Crealis guarantees that relations with the Judicial Authorities of every order and degree, auxiliaries and organs of the Judicial Police are marked by the utmost transparency, correctness and collaboration; in this regard, the Recipients must refrain from adopting conduct that may result, even indirectly, in hindering the work of the organs of Justice (such as, for example, inducing persons to make false or reticent statements to the Judicial Authorities).

4.2. Suppliers

The selection of suppliers and the determination of purchasing conditions must be made on the basis of an objective and transparent evaluation that takes into account, among other things, price, speed of product realization, ability to provide and guarantee services of an appropriate level, and also the supplier's honesty and integrity.

The Recipients undertake to prevent the risk of criminal infiltration by proceeding to the timely verification of the requisites of honorability and reliability of suppliers, resulting in the exclusion of any counterparty whose affiliation or contiguity to criminal organizations is suspected.

Recipients may not accept free gifts, presents and the like, unless directly attributable to normal courteous relations and provided they are of modest value, however, not exceeding 100.00 Euros.

If a recipient receives proposals for benefits from a supplier, he or she should immediately report this to his or her function manager.

The giving of gifts and acts of commercial courtesy of a value exceeding 100.00 euros to suppliers is prohibited, except with the prior approval of the Chief Executive Officer. In any case, it is forbidden to give gifts and acts of commercial courtesy, regardless of their value, to suppliers who have expressly notified Crealis that they cannot accept them due to company *policy*.

5. Administrative and accounting management

Each Recipient is responsible for the truthful, complete, regular, clear, and accurate maintenance of accounting records, which shall be compiled in a manner that complies with applicable regulations in order to enable the reconstruction of the transactions performed by means of complete supporting documentation properly filed.

Anyone who becomes aware of omissions, falsifications, or carelessness in accounting records or supporting documentation should promptly report them to his or her department head or the appropriate supervisory bodies.

Adequate traceability support shall be arranged for each record in order to be able, at any time, to carry out controls that attest to the characteristics and reasons for the transaction and identify who authorized, performed, recorded and verified the transaction.

6. Dissemination and updating of the Code

The Company is committed to fostering and ensuring adequate awareness of the Code by disseminating it to Recipients through appropriate, effective and adequate information and communication activities (e.g., through publication on its website and posting on common notice boards).

The Company ensures constant updating of the contents of the Code should the needs dictated by the changing context, reference regulations, environment or company organization make it appropriate and necessary.

7. Violations of the Code

Violation of the rules of this Code harms the relationship of trust established with the Company and may lead to the application of disciplinary sanctions and the adoption of measures, against the Recipients, consistent with the provisions of the law and the envisaged contractual regimes, including the possible termination of the employment relationship and the interruption of the business relationship.

The Company is aware that, in order to encourage reports of wrongdoing or violations of the Model, it is necessary to create an ad hoc system for handling them, which protects through appropriate technical and organizational measures the confidentiality of the identity of the reporting person, the person involved and the person in any case mentioned in the report, as well as the content of the report and the related documentation, and which is entrusted to an autonomous and specifically trained person.

The Company has therefore equipped itself, in compliance with Legislative Decree 24/2023, with specific reporting channels, entrusting their management to a special internal committee (hereinafter the "Whistleblowing Manager") and also defining, in a special procedure (hereinafter the "Whistleblowing Procedure"), published on the Company's website, the operating procedures and responsibilities for the receipt, assessment, management and closure of reports.

In particular, the reporting channels allow the persons expressly indicated by Legislative Decree 24/2023 and the Whistleblowing Procedure (by way of example: employees, collaborators, shareholders, consultants, etc., hereinafter referred to as the "Whistleblowers"), to submit, in order to protect the integrity of the Company, reports relating to unlawful conduct relevant under Legislative Decree 231/2001 or violations of the Model, as well as relating to violations of European Union law and national transposing legislation referred to in Legislative Decree 24/2023, all learned in the context of their own work context (hereinafter referred to as the "Reports"):

- either in written form, through the EQS Integrity Line platform (hereinafter the "Platform") manned by adequate security measures (in particular with the use of encryption tools) to protect the confidentiality of the identity of the Reporting Persons, the persons Reported, the persons otherwise mentioned in the Report, as well as the content of the Reports and related documentation;
- either orally - via voice messaging system, integrated into the Platform and/or request for a direct meeting with the Reporting Manager, again conveyed via the Platform