

Supplier Code of Conduct

Version 01 of 25/06/2026

Introduction

Gpack S.p.A. has chosen, within the framework of its corporate management, the objective of achieving social and environmental objectives, of complying with and respecting the ethical and moral values defined on the basis of the principles of fairness, honesty and transparency in compliance with the standards in force at national and international level.

Gpack S.p.A. considers the overall impact of its decisions in any field, be it environmental, social and governance, as a fundamental element of its business, as well as always keeping the interests and safety of its stakeholders at heart.

This **Supplier Code of Conduct**, which is an expression of the Company's principles and values, requires strict compliance by all its suppliers, subcontractors and subcontractors.

Gpack S.p.A. believes that its Suppliers act according to the same principles, respecting them and ensuring that they are respected, and adhering to the same philosophy in the management of its company.

The indications contained in this Code are not intended to conflict with the terms and conditions of the contracts entered into between the Supplier and the Company. It should be noted that any violation by our Suppliers of this Code and/or of the standards in force at national and international level, will be potentially suitable for the Company to cause the early termination of the relationship put in place.

Management systems

The Supplier shall ensure that adequate and effective management systems are in place in order to comply with this document, applicable laws and regulations:

- the Supplier must adopt a structured approach to assess, mitigate and manage risks related to human and labour rights, occupational health and safety, responsible business and environmental impact.
- the Supplier must take improvement actions relating to the issues covered in the Code of Conduct and identify actions aimed at achieving these objectives in order to ensure the improvement of performance.

- the Supplier must comply with all laws, regulations and contractual conditions that affect its assignments, and communicate them in a timely manner to employees and business partners through appropriate information;
- Supplier shall put in place systems to allow complaints to be made regarding matters relating to the Code of Conduct.
- the Supplier must conduct due diligence on human rights and the environment, possibly in line with internationally recognised guidelines (such as the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct) or, alternatively, according to the best approach reasonably practicable according to its size and capabilities, in order to identify, prevent and mitigate actual or potential negative impacts along its supply chain;
- the Supplier must extend the contents of this Code, or its equivalent code, to its representatives, subcontractors and subcontractors along the entire supply chain to the origin, and cooperate with the Company to demonstrate compliance with it;
- Supplier must communicate this Code, or its equivalent code, to its workers in a language they understand, and maintain an accessible grievance mechanism, in line with the effectiveness criteria of the United Nations Guiding Principles on Business and Human Rights (UNGPs), that allows reports to be collected and handled without fear of retaliation.

Labour and human rights

The Supplier undertakes to:

- to respect human rights and not to be complicit in human rights violations;
- monitoring its impact on human rights if necessary;
- have the appropriate means to resolve any human rights violations;
- not employ persons under the age of 18, or the minimum age according to national legislation, whichever is higher (in line with ILO Convention 138 on child labour);
- ensure that employing people above the minimum legal age, but under the age of 18, does not jeopardise people's education, health, safety or morals;
- recognising employees' rights to organise, be members of a trade union and negotiate collectively;
- not resort to any form of forced labor;
- not to impose compulsory overtime and allow workers to leave their employment on reasonable notice, without unreasonable restrictions on freedom of movement;

- not withholding identity documents, passports or work permits, not imposing financial penalties as a condition of employment and not requiring workers to pay recruitment fees;
- not discriminate against any employee or potential employee;
- Treat all employees with fairness and respect without the slightest tolerance for any kind of corporal punishment, psychological, physical harassment or any other type of abuse.

Wages and working hours

The Supplier undertakes to:

- remunerate its employees and collaborators in accordance with the provisions of applicable laws and regulations, as well as the collective agreements adopted;
- provide employees with adequate pay to ensure the satisfaction of basic needs and living standards that respect the dignity of the individual;
- guarantee all employees the benefits provided by collective bargaining, company agreements and any other applicable individual or collective agreement;
- enforce working hours in accordance with applicable laws and collective agreements;
- give all employees at least one day off every seven consecutive days of work unless otherwise provided for by applicable laws;
- comply with the legal or contractually agreed limit on hours worked.

Occupational health and safety

The Supplier undertakes to:

- ensure a healthy and safe working environment for its workers to avoid accidents or injuries, including those related to work with machinery.
- have systems in place to identify, avoid or neutralize any threat to the health and safety of its employees, in compliance with local and international regulations and laws currently in force.
- meet all applicable legal requirements regarding occupational health and safety;
- ensure that you have operational control, such as rules and procedures, and that you inform all employees thereof;
- raise employee awareness of health and safety, enhance the safety culture through open communication and ensure that all staff have received adequate training;
- measure and monitor performance and any hazards through workplace inspections and audits;
- report and investigate accidents related to health and safety at work;

- establish, implement and maintain an emergency preparedness and response plan, inclusive of persons with disabilities, covering medical emergencies, spills of hazardous and non-hazardous materials, fires and severe weather events, and regularly reviewing its effectiveness.

Data protection

The Provider shall ensure and warrant compliance with applicable privacy and personal data protection laws and regulations, in particular (but not limited to) the EU General Data Protection Regulation (GDPR; EU 2016/679). When Supplier collects, stores, processes and discloses personal data, it will prevent the loss of data or privacy violations of identifiable individuals, including any employee, consumer or customer. In the event of a breach of privacy, the Provider guarantees that it takes all necessary measures to comply with the GDPR or other applicable laws and regulations regarding privacy and the protection of personal data.

Environmental impact

Gpack SpA. (Company) pays the utmost attention to environmental sustainability through specific programs such as the reduction of environmental impacts, such as the management of water, energy, waste and emissions into the atmosphere, also through the use of renewable sources to reduce the consumption of fossil resources.

And it is for this reason that the Company asks its Supplier to undertake to:

- Meet all environmental requirements, including pollution prevention, waste management, greenhouse gas emissions, energy consumption, hazardous substances, biodiversity and non-deforestation or land conservation and resource efficiency, in accordance with applicable laws, regulations and permits.
- appoint environmental officers within their organization;
- ensure that its employees have adequate environmental knowledge and experience, as well as resources to enable them to fulfil their environmental responsibilities;
- ensure that written instructions and relevant information regarding processes with potential environmental impact (e.g. storage and handling of hazardous materials) are disseminated to all employees;
- work to prevent any environmental emergencies and ensure their preparedness to respond appropriately in such an eventuality, analyzing, identifying and adopting preventive and corrective measures;
- systematically manage environmental violations or issues and communicate the information to employees and external stakeholders, including the Company if involved;

- provide the Company with up-to-date material safety data sheets (safety data sheets or safety data sheets) and all relevant documents and information required by the Company.
- share, if available, all relevant environmental information, including data related to Product Life Cycle Analysis (LCA), greenhouse gas (GHG) emissions, biodiversity, non-deforestation or land conservation.

Responsible business

The Supplier undertakes to:

- carry out its activities in full compliance with current antitrust and fair competition legislation;
- comply with all applicable anti-money laundering laws, taking appropriate measures to ensure that their operations are not used to facilitate money laundering;
- comply with applicable laws and regulations on international trade control, including those relating to imports, export controls, economic sanctions and anti-boycott rules, by making available to the Company, upon request, the necessary documentation (e.g., certificates of origin, manufacturer's declarations, tariff classification information);
- to prevent any conflicts of interest between the Parties;
- not to accept or offer bribes, facilitative payments or any object of value for the purpose of obtaining or entertaining business or any undue benefits or advantages, having to, in general, comply with existing anti-corruption legislation;
- comply with all rules and regulations, including those provided by the Company, relating to the safety and quality of products and services;
- Transparently and accurately record and disclose details of its business operations, organizational structure, economic situation and performance in accordance with applicable laws and regulations.

This may include that no gifts, gifts or sums of money should be given that could be considered inappropriate or inappropriate in connection with potential business transactions.

Monitoring

At Gpack S.p.A. we regularly monitor our activities, through audit systems and periodic performance evaluations that also involve the activities carried out by our suppliers.

We ask our supplier to commit to cooperating in a fair and transparent manner in the conduct of these activities. The Supplier therefore undertakes to agree to verify the operations that are relevant to Gpack S.p.A., including the Supplier's systems and the analysis of records and registers.

It is understood that the Company reserves the right to carry out an Audit prior to the signing of a Contract and/or during the entire term of the relevant Contract according to its needs.

With regard to the Audit, the Supplier undertakes to communicate, at the request of the Company, the information and data requested, unless this constitutes a violation of its legal obligations on the dissemination of information.

At the request of the Supplier, the Parties will enter into a confidentiality agreement relating to all Confidential Information disclosed in connection with the Audit.

Internal regulations

The Supplier acknowledges that Gpack S.p.A., pursuant to Legislative Decree no. 8 June 2001, has also adopted an organisation, management and control model (OMM) and a Code of Ethics, both of which are available, available and can be downloaded free of charge on the website www.gpack.eu

The Supplier undertakes to refrain from conduct that may constitute offences referred to in the Decree, regardless of the actual commission of the offence or its punishability, as well as to operate in compliance with the provisions and principles of the Decree itself.

The Supplier also undertakes to comply with the provisions of the Code of Ethics, to the extent of its competence and as amended from time to time, in relation to compliance with its obligations arising from the Contract and in the course of its relations with the Company. In the event of violation of the provisions of the Code of Ethics, the Company shall have the right to immediately terminate the Contract and to ask the Supplier for compensation for any damages suffered, within the limits quantified.

The Company undertakes to promptly notify the Supplier of any changes to the Code and to make it available on its website at all times.

Truccazzano, 25/06/2026

Alessandro Floris
CEO

