

Code of Ethics

of Gpack S.p.A. and Gpack General Packaging S.r.l.

Version 01 of 30/09/2025

Objectives of the Code of Ethics

The purpose of this **Code** of Ethics (hereinafter also referred to as the "Code") is to define the fundamental ethical principles, rules of conduct and responsibilities that Gpack S.p.A. and Gpack General Packaging S.r.l. recognise, respect and assume as a binding value and imperative to which all recipients of the Code of Ethics are required to comply.

The Code therefore identifies the prerequisites aimed at ensuring that the company's activity is inspired by the principles of **fairness, transparency, diligence, honesty, mutual respect, loyalty and good faith, in order to safeguard the interests of stakeholders and ensure an efficient, reliable, correct working method, set up in compliance with legal rules and ethical principles** deemed adequate and necessary and essential to operate within the market.

The Code presupposes compliance with binding and applicable regulatory and administrative provisions as well as precise compliance with company regulations and procedures.

In particular, Gpack S.p.A. and Gpack General Packaging S.r.l. are determined to carry out their activities in full compliance with Italian laws and those of the countries in which they may operate, also in collaboration and association with other companies; in particular, they undertake to align their activities with the provisions of Legislative Decree no. 231/01 and subsequent amendments and additions.

Therefore, the Code of Ethics, to be considered an integral part of the Organization, Management and Control Model (MOG), constitutes the basis on which to implant the preventive control system for the purposes of the Decree.

Who is it for?

The ethical principles, values and rules of conduct set out in this Code must inspire the activity of all those who operate, from inside or outside, in the sphere of action of Gpack S.p.A. in the production sites of Truccazzano, Vailate, Cambiago and Cavaione and Gpack General Packaging S.r.l. in the production site of Bottanuco.

In particular, by way of example:

- the members of the administrative body are inspired by the principles of the Code in setting the company's objectives;
- the managers give substance to the values and principles contained in the Code, taking on internal and external responsibilities and strengthening the trust, cohesion and spirit of Gpack S.p.A. and Gpack General Packaging S.r.l.;
- employees, in due compliance with the law and regulations in force, adapt their actions and conduct to the principles, objectives and commitments set out in the Code;
- collaborators on an ongoing basis (consultants, agents, business brokers, etc.) conform their conduct to the Code.

All Recipients are required to observe and, to the extent of their competence, to ensure compliance with the principles contained in the Code: under no circumstances does the claim to act in the interest of Gpack S.p.A. and/or Gpack General Packaging S.r.l. justify the adoption of conduct in contrast with those set out herein.

Gpack S.p.A. and Gpack General Packaging S.r.l. undertake **to ensure timely internal and external dissemination of the Code by distributing it to all members of the corporate bodies and all employees, posting it in a place accessible to all, and making it available to Recipients on the website and on company communication channels.**

This Code is approved by the Chief Executive Officer of Gpack S.p.A. and by the Sole Director of Gpack General Packaging S.r.l. Each area manager is required to implement the code in their operating area, while all workers and individuals working on behalf of the company have a duty to comply with its principles and contribute to its continuous improvement.

The Code of Ethics is also subject to periodic review if it is necessary to adapt the methods of carrying out company activities.

The duties of the Recipients

All actions, operations and negotiations and, in general, the conduct carried out by the Recipients in the performance of their work activities, must be based on the principles of honesty, fairness, integrity, transparency, legitimacy, clarity and mutual respect, as well as be open to checks and controls in accordance with current regulations and internal procedures.

All activities must be carried out with commitment and professional rigor. Each Recipient must provide professional contributions appropriate to the responsibilities assigned and must act in such a way as to protect the prestige of Gpack S.p.A. and Gpack General Packaging S.r.l.

Any situation of conflict of interest, between personal or family economic activities and company duties held, must be avoided.

By way of example, and not limited to, **the following situations may result in a conflict of interest:**

- have economic and financial interests, including through family members, with suppliers or competitors;
- accept money, gifts, favours or other benefits of any kind from persons, companies or entities that are or intend to enter into business relations with Gpack S.p.A. and/or Gpack General Packaging S.r.l.;
- exploit its functional position for the realization of interests that conflict with those of Gpack S.p.A. and/or Gpack General Packaging S.r.l.;
- concluding, perfecting or initiating its own negotiations and/or contracts in the name and/or on behalf of Gpack S.p.A. and/or Gpack General Packaging S.r.l. which have as counterparties their family members or partners, or legal persons of which the Recipient is the owner or in which he is in any case interested;
- it is therefore necessary to avoid all situations and all activities in which a conflict may arise with the interests of Gpack S.p.A. and/or Gpack General Packaging S.r.l. or that may interfere with the ability to take decisions impartially, in the best interest of the company and in full compliance with the principles and contents of the Code and in a general sense, to carry out exactly the functions and responsibilities held.

Each Recipient is required to safeguard the company's assets, safeguarding the movable and immovable assets, technological resources and IT supports, equipment, company products, information and/or know-how of Gpack S.p.A. and Gpack General Packaging S.r.l.

The good reputation and/or image of the company represents an essential intangible resource. The Recipients undertake to act in accordance with the principles dictated by this Code in relations between colleagues, customers and third parties in general, maintaining a decent conduct in accordance with the standards common to companies of the size and importance of Gpack S.p.A. and Gpack General Packaging S.r.l.

In particular, each Recipient must:

- use company assets according to company policies, scrupulously observing all security programs to prevent unauthorized use or theft;
- avoid improper use of company assets that may cause damage or reduce efficiency or, in any case, in contrast with the interest of Gpack S.p.A. and Gpack General Packaging S.r.l.;
- maintain the secrecy of confidential information concerning Gpack S.p.A. and Gpack General Packaging S.r.l. or their commercial partners, avoiding revealing it to third parties;
- scrupulously comply with the provisions of the company's security policies, in order not to compromise the functionality and protection of IT systems;
- not to send threatening and abusive e-mail messages, not to use unpolite or unprofessional language, not to express inappropriate comments that may offend the person and/or damage the corporate image;
- keep and not reveal to unauthorized third parties your personal password and your access code to company databases;
- not to reproduce the company software for personal use or to use the tools supplied for private purposes.

Each Recipient is responsible for protecting the resources entrusted to him or her and has the duty to promptly inform his or her direct managers of potentially harmful events.

Objectives:

- keep at zero ("0") the cases of conflict of interest detected and/or reported annually;
- Ensure that 100% of employees complete a training module on conflicts of interest by 2030;

Relations with Stakeholders

The term stakeholders indicates those subjects directly or indirectly involved in the activities of Gpack S.p.A. and/or Gpack General Packaging S.r.l. who have some interest in relation to the decisions, strategic initiatives and possible actions carried out by them. Therefore, stakeholders include, but are not limited to, employees, customers, shareholders, citizens, attorneys, collaborators in any capacity, suppliers, financial and/or commercial partners, municipal, provincial and national institutions, trade associations, environmental associations and, more generally, anyone interested in their activities, both nationally and internationally.

Fairness in relations with these parties is an essential objective of Gpack S.p.A. and Gpack General Packaging S.r.l., as a primary imperative of the Code, as well as a suitable condition for promoting, among other things, the investment choices of shareholders, the loyalty and trust of customers, the reliability of suppliers, external collaborators and business partners, the continuous improvement of relations with human resources, the development of a virtuous dialogue with local communities and institutions, the management of relations with the Public Administration based on criteria of transparency and fairness, the management of relations with the Authorities inspired by criteria of collaboration, the truthfulness and completeness of the information provided to the press, avoiding and preventing the commission of unlawful acts and crimes, with particular reference to those indicated by Decree 231.

For this reason, the conduct of all Recipients of the Code towards Stakeholders must be consistent and consistent with the principles of the Code.

Transparency

Gpack S.p.A. and Gpack General Packaging S.r.l. are committed to providing correct and complete information to shareholders, including potential members, in a timely and transparent manner, adopting connection and dialogue tools in line with the best market practices.

The Companies ensure that the shareholders can contribute to the business decisions of competence in an informed manner and constantly maintains updated information channels and dialogue with the shareholders that allow due consideration of the indications and suggestions that they intend to propose.

Gpack S.p.A. and Gpack General Packaging S.r.l. work to constantly increase the value of the shareholders' investment, managing the company's assets on the basis of professionalism, diligence and prudence imposed from time to time and necessary to meet market conditions and legal constraints.

The truthfulness and accuracy of the documentation

Gpack S.p.A. and Gpack General Packaging S.r.l. ensure the training of their managers, employees and collaborators so that truthfulness, completeness and timeliness of information are constantly guaranteed, both internally and externally. To this end, each operation or transaction must be correctly and promptly recorded and recorded in the company's accounting system according to the criteria indicated by law and on the basis of the applicable accounting principles; Each operation or transaction must be authorized, verifiable, legitimate, consistent and congruous.

In order for the accounting to meet the requirements of truthfulness, completeness and transparency, adequate and complete supporting documentation of the activity carried out must be kept in the records, so as to allow:

- the accurate recording and accounting of each transaction;
- the immediate determination of the characteristics and motivations behind it;
- the easy formal and chronological reconstruction of the operation;
- the verification of the decision-making, authorisation and implementation process, as well as the identification of the various levels of responsibility and control.

Each accounting entry must reflect exactly what is reflected in the supporting documentation. Therefore, it is the responsibility of each employee or collaborator responsible for this purpose to ensure that the supporting documentation is easily available and ordered according to logical criteria and in accordance with company provisions and procedures. No Recipient may make, in the absence of adequate supporting documentation and formal authorization, payments in the interest of and on behalf of Gpack S.p.A. and/or Gpack General Packaging S.r.l..

Internal controls

"Internal controls" means all the tools necessary or useful to direct and verify activities with the aim of ensuring compliance with company laws and procedures, protecting company assets, effectively managing corporate activities and clearly providing truthful and correct information on the assets, economic and financial situation, as well as identifying and preventing risks.

It is the task of Gpack S.p.A. and Gpack General Packaging S.r.l. to spread, at all levels, an internal culture characterized by awareness of the existence of controls and oriented towards the exercise of control itself.

Within the scope of their functions and responsibilities, Managers are required to participate in the creation and implementation of an effective corporate control system and to involve their subordinates.

Project employees/workers must, within their competence, contribute to the proper functioning of the control system and responsibly guard company assets, whether tangible or intangible, instrumental to the activity carried out and not to misuse them.

Prevention of money laundering

Gpack S.p.A. and Gpack General Packaging S.r.l. are committed to complying with all national and international anti-money laundering regulations and provisions. The Recipients must not, in any way and under any circumstances, except in exceptional cases permitted by anti-money laundering legislation, receive or accept the promise of cash payments or run the risk of being involved in events relating to the laundering of money deriving from illegal or criminal activities. Before establishing relationships or entering into contracts with non-occasional suppliers and other partners in long-term business relationships, the Recipients must ensure the moral integrity, reputation and good name of the counterparty.

Objectives:

- *keep at zero ("0") the number of money laundering incidents that can be recorded annually and the related administrative sanctions or criminal proceedings by supervisory authorities;*
- *ensure that 100% of employees complete a training module on the topic of money laundering by 2030.*

Rules of conduct towards suppliers, external collaborators and business partners

The professionalism and commitment of Gpack S.p.A. and Gpack General Packaging S.r.l. to constant compliance with current legislation characterize the selection of suppliers, external collaborators (including consultants, agents, etc.) and commercial partners identified from time to time to define a complementary relationship with the specific professionalism required, organizing forms of collaboration and mutual exchange and delegating to them the execution of part of their activities.

Professional and commercial contributions must be based on commitment and professional rigor and must, at all times, be aligned with the level of professionalism and responsibility that characterizes Gpack S.p.A. and Gpack General Packaging S.r.l., with the attention and precision required to pursue respect and dissemination of their prestige and reputation.

Practices of corruption, illegitimate favours, collusive behaviour, solicitation of advantages, payment of tangible and intangible benefits as well as other advantages aimed at influencing or compensating representatives of institutions as well as employees of Gpack S.p.A. and/or Gpack General Packaging S.r.l.

Suppliers, external collaborators and business partners are selected according to procedures that comply with the applicable laws and are constantly based on criteria of transparency, competitiveness and efficiency.

To this end, in conducting these processes, Gpack S.p.A. and Gpack General Packaging S.r.l. undertake to:

- to recognize participants in possession of the necessary requirements, equal opportunities to participate in the selection;
- ensure the participation in the selection of at least two suppliers, except in exceptional cases and governed by specific company procedures;
- verify the integrity and professionalism requirements of external collaborators and business partners;
- verify, also through appropriate documentation, that they have means, including financial means, organizational structures, technical skills and experience, quality systems and resources adequate to the needs and image of Gpack S.p.A. and Gpack General Packaging S.r.l.;

- verifying compliance with labour legislation, including child labour, the health and safety of workers;
- verify the non-involvement, whether natural or legal persons, in acts of terrorism.

Suppliers, external collaborators and business partners must adhere to all the contractual documentation submitted, which will include the obligation to comply with the Code, as well as the other rules of voluntary conduct that Gpack S.p.A. and Gpack General Packaging S.r.l. have prepared for this purpose and communicated that they will also provide for specific sanctions for any violation of the same. Suppliers, external collaborators and business partners are called upon to adhere to the objective of attention to the needs of the territory, local communities and customers that shape the activity of Gpack S.p.A. and/or Gpack General Packaging S.r.l.

The selection of suppliers, external collaborators and business partners and the execution of the related contracts are characterized at all times by transparency, certainty and written form, without different rules and in violation of what emerges from the available documents being able to be, for any reason, prevailing or binding.

The remuneration to be paid to suppliers and external collaborators must be exclusively commensurate with the service indicated in the contract and payments may not in any way be made to a party other than the contractual counterparty or in a third country other than that of the parties or of performance of the contract.

The implementation of activities by suppliers, external collaborators and business partners, whether they are called upon to collaborate with company employees or whether they are called upon to carry out their activities independently, must be in compliance with procedures aimed at respecting safety and health in the workplace.

Gpack S.p.A. and Gpack General Packaging S.r.l. inform suppliers, external collaborators and business partners of the content of this Code, as well as the principles contained in the Organisation, Management and Control Model pursuant to Legislative Decree no. 231 of 2001, by making it available.

Objectives:

- *keep detected and/or reported cases of corruption or bribery at zero ("0") for 100% of the venues;*
- *ensure that 100% of employees, including managers and consultants with exposure to risk (e.g. purchases, sales, relations with the Public Administration), complete a training module on anti-corruption and collusive behaviour by 2030;*
- *complete a formal anti-corruption due diligence on 100% of new suppliers, business partners, agents and intermediaries before the contract is signed, by 2030;*

Personnel and rules of conduct

Gpack S.p.A. and Gpack General Packaging S.r.l. recognize the central role of human resources in achieving the company mission and, consequently, adopt procedures and methods of selection, training and work based on respect for human values, the autonomy and responsibility of workers as well as the importance of individual and organized participation and adherence to the company's objectives and values.

It is in the interest and imperative of Gpack S.p.A. and Gpack General Packaging S.r.l. to encourage the development of the potential of each employee or collaborator, promoting an environment, procedures and work organization that are constantly based on:

- respect, even in the selection of personnel, for the personality and dignity of each individual, and that prevent the creation of situations of discomfort, hostility and intimidation at all times;
- the prevention of discrimination and abuse of all kinds;
- the enhancement of the innovative and entrepreneurial spirit, respecting the limits of everyone's responsibilities;
- the definition of roles, responsibilities, delegations and availability of suitable information to ensure that each member of the organization can take the decisions that are his/her responsibility in the interest of Gpack S.p.A. and Gpack General Packaging S.r.l.

The Companies require that no harassment of any kind occurs in internal and external employment relationships, such as, for example, the creation of a hostile work environment towards individual workers or groups of workers, unjustified interference with the work of others or the creation of obstacles and impediments to the professional prospects of others.

Sexual harassment is not allowed, meaning as such, the subordination of the possibilities of professional growth to the provision of sexual favors or the proposals of private interpersonal relationships that, due to the fact that they are unwelcome to the recipient, may disturb his serenity. Each Recipient must refrain from carrying out his or her activity under the influence of alcohol or drugs, or that have a similar effect, and from consuming such substances during the course of work. States of chronic dependence on alcohol and drugs that affect work performance and that may disturb the normal performance of the same will be equated with previous cases.

The evaluation of personnel for recruitment purposes is managed on the basis of verifying the correspondence of the candidates' profiles with the needs expressed, in compliance with equal opportunities between candidates and the legislation on the employment relationship.

The information requested from candidates is linked only to the verification of the correspondence of the profile sought with the advanced application. Gpack S.p.A. and Gpack General Packaging S.r.l. undertake not to encourage forms of clientelism and nepotism.

Staff are recruited only on the basis of regular employment contracts, as no form of irregular work is tolerated. The candidate must be made aware of all the characteristics pertaining to the employment relationship, with specific reference to the characteristics of the function and the work to be performed, the remuneration and regulatory elements, the rules and procedures to be adopted in the workplace.

Following the establishment of the employment relationship, access to higher roles and positions (promotions) is linked, in addition to the rules established by law and the collective bargaining agreement, to the individual merits of the employees.

Even in individual awards and promotions, Gpack S.p.A. and Gpack General Packaging S.r.l. fight and reject any hypothesis of discrimination on the basis of sex, nationality, religion, political, trade union and personal opinions.

Environment, Health and Safety in the workplace

Gpack S.p.A. and Gpack General Packaging S.r.l. care about the protection of the environment, both internal and external, and demand the utmost respect for environmental legislation and legislation on health and safety in the workplace.

In compliance with respect for the person and in compliance with the legal precepts that are binding from time to time, the Companies ensure the creation and management of environments and workplaces that are suitable from the point of view of the health and safety of employees.

In particular, the fundamental principles and criteria on the basis of which decisions are taken, in the field of health and safety at work, are:

- avoid risks;
- assess risks that cannot be avoided and combat them at source;
- replace what is dangerous with what is not dangerous or less dangerous;
- plan prevention, aiming at a coherent whole that integrates the same technique, work organization, working conditions, social relations and the influence of factors in the working environment;
- prioritise collective protection measures over individual protection measures;
- give adequate instructions to workers.

Workers must contribute to the protection of their safety by complying with the rules and standards provided for in this area.

Gpack S.p.A. and Gpack General Packaging S.r.l. are committed to guaranteeing the safety and health of their employees, without prejudice to the prohibition of smoking in places where this may pose a danger to the safety of people and the healthiness of the environment. In all situations of cohabitation at work, they undertake to take particular account of the condition of those who experience physical discomfort in the presence of passive smoking in the workplace.

As part of their activities, Gpack S.p.A. and Gpack General Packaging S.r.l. are committed to contributing to the development and well-being of the community in which they operate by pursuing the goal of reducing environmental impact through elements of innovation and progress.

Whistleblowing

Anyone who comes into contact with Gpack S.p.A. and/or Gpack General Packaging S.r.l. is obliged to observe and ensure compliance with this Code.

Compliance with the rules contained in this Code must be considered an essential part of the contractual obligations envisaged for the employees of Gpack S.p.A. and/or Gpack General Packaging S.r.l., pursuant to Article 2104 of the Civil Code, as well as for their collaborators.

Violation of the aforementioned rules will constitute a breach of the obligations arising from the employment relationship and/or a disciplinary offence, with all legal consequences, including with regard to the preservation of the employment relationship, which may also result in termination for just cause and with immediate effect from the relationship.

Gpack S.p.A. and Gpack General Packaging S.r.l. undertake to provide for and impose, with consistency, impartiality and uniformity, sanctions proportionate to their respective violations of the Code and in compliance with the provisions in force on the regulation of employment relationships.

The Companies encourage the Recipients to promptly report to the Supervisory Body any unlawful conduct or, in any case, conduct contrary to the Code, of which they become aware due to their relations with the company.

To this end, Gpack S.p.A. and Gpack General Packaging S.r.l. have adopted an internal whistleblowing system, aimed at strengthening the safeguards of legality and transparency.

In this regard, anyone who commits retaliatory action against a person, who in good faith makes a report or collaborates with an investigation, will be subject to disciplinary action which may also include dismissal.

Except in cases of liability by way of slander and defamation, or for the same reason pursuant to art. 2043 of the Italian Civil Code, no Recipient who communicates a suspicion in good faith may be exposed to retaliation on the basis of the communication made, even if the suspicion proves to be unfounded. Reports must be submitted through the use of an IT platform using encryption tools to guarantee the confidentiality of the identity of the whistleblower.

Reports can also be made anonymously. The Supervisory Body and the members of the Whistleblowing Service act in such a way as to guarantee whistleblowers against any form of retaliation, discrimination or penalization, also ensuring the confidentiality of the identity of the whistleblower, without prejudice to legal obligations and the protection of the rights of Gpack S.p.A. and Gpack General Packaging S.r.l. or of the persons involved, as well as the reputation of the whistleblowers.

Rules of conduct in relations with the Public Administration

Relations with the Public Administration are based on maximum transparency and fairness.

In particular, necessary relationships are maintained, in compliance with the roles and functions assigned by law, as well as in a spirit of maximum collaboration with the State Administrations, in Italy or in other countries.

Relations with officials of public institutions are limited to company functions duly authorized in compliance with the strictest compliance with the provisions of law and regulations and may not in any way compromise the integrity and reputation of Gpack S.p.A. and Gpack General Packaging S.r.l.

To this end, it is forbidden to offer, directly or through intermediaries, sums of money or other means of payment to public officials or persons in charge of public services, in order to influence their activity in the performance of their duties.

These requirements cannot be circumvented by resorting to different forms of contributions which, under the guise of sponsorships, assignments and consultancy, advertising, etc., have the same purposes prohibited above. Acts of courtesy, such as gifts and forms of hospitality, towards representatives of the Public Administration or public officials, are allowed as long as they are of modest value and such as to be considered customary in relation to the anniversary, not to compromise integrity and reputation and not to influence the recipient's autonomy of judgment. In any case, these expenses must always be authorized according to specific company procedures and adequately documented.

In the same way, the Recipients may not receive gifts or preferential treatment, except within the limits of normal courtesy relations and provided that they are of modest value. This rule, relating both to gifts promised or offered, and to those received, also applies in those countries where offering gifts of high value is customary.

Rules of conduct in economic relations with parties, trade unions and associations

Gpack S.p.A. and Gpack General Packaging S.r.l. do not make contributions of any kind, directly or indirectly, to political parties, movements, committees and political and trade union organizations, nor to their representatives or candidates, either in Italy or abroad, with the exception of contributions due on the basis of specific regulations.

The Companies refrain from any direct or indirect pressure on political or trade union representatives, through their managers, employees or collaborators.

Directors, managers and employees, in turn, may not engage in political activity during working hours or use goods or equipment for such purposes; they must also clarify that any political opinions they express to third parties are strictly personal and therefore do not represent the opinion and orientation of Gpack S.p.A. and Gpack General Packaging S.r.l. themselves.

In relations with other associations with interests (e.g. trade associations, environmental organizations, etc.) no Recipient must promise or pay sums, promise or grant goods in kind or other benefits in a personal capacity to promote or favor the interests of Gpack S.p.A. and/or Gpack General Packaging S.r.l.

Rules of conduct for the management of contributions and sponsorships

Gpack S.p.A. and Gpack General Packaging S.r.l. can adhere to requests for contributions limited to proposals from non-profit organizations and associations or that are of high cultural or charitable value. Sponsorship activities can concern social, environmental, sport, entertainment, art and culture issues.

In any case, in the choice of the proposals to join, particular attention is paid to any possible conflict of interest of a personal or corporate nature.

To ensure consistency in contributions and sponsorships, as well as to ensure an adequate level of control over the effective provision of sponsorship services, management will be based on principles of transparency and diligence.

Rules of conduct for the management of relations with the media

Relations with the mass media are the exclusive responsibility of the corporate functions delegated to this and must be maintained in compliance with the communication policy defined by Gpack S.p.A. and Gpack General Packaging S.r.l. The Recipients may not, therefore, provide information to the representatives of the mass media without the authorization of the competent corporate functions. In any case, information and communications relating to the Companies and intended for external parties must be accurate, truthful, complete, transparent and homogeneous.

Rules of conduct for the prevention of corporate crimes

The Addressees and, in particular, the directors are prohibited, in the financial statements, reports or other corporate communications addressed to shareholders or the public, from disclosing material facts that do not correspond to the truth, even if subject to evaluation, or from omitting the information required by law on the economic, equity or financial situation of Gpack S.p.A. and Gpack General Packaging S.r.l., in such a way as to mislead the addressees about the aforementioned situation or to cause financial damage to the shareholders and creditors of the same.

The Recipients and, in particular, the directors are prohibited from:

1. prevent or hinder, through concealment or other suitable artifices, the performance of control or auditing activities legally attributed to shareholders, other corporate bodies or auditing firms;
2. return, even through simulated deeds, the contributions to the shareholders or release them from the obligation to carry them out, except in cases of legitimate reduction of the share capital;
3. allocate profits or advances on profits not actually achieved or destined, by law, to reserves and allocate reserves, even if not made up of profits, which cannot be distributed by law;
4. purchase or subscribe for shares or shares that cause damage to the integrity of the share capital or reserves that cannot be distributed by law, except in cases permitted by law;
5. carry out reductions in the share capital or mergers with another company or demergers such as to cause damage to creditors, in violation of the provisions of the law protecting the creditors themselves;
6. to fictitiously form or increase, even partially, the capital of Gpack S.p.A. and Gpack General Packaging S.r.l. through the assignment of shares or quotas for a sum lower than their nominal value, reciprocal subscription of shares or quotas, significant overvaluation of assets in kind or receivables or assets in the event of transformation.

Gpack S.p.A. and Gpack General Packaging S.r.l. are therefore committed to building an organizational environment with zero tolerance towards any form of fraud, internal or external, actively committing themselves to preventing any unlawful conduct through an ethical and responsible corporate culture.

Objectives:

- keep the number of incidents of fraud that can be recorded annually at zero ("0");
- ensure that 100% of employees in administrative positions complete a fraud-related training module by 2030.

Rules of conduct for the prevention of terrorist offences

To the Recipients who carry out operational activities on behalf of Gpack S.p.A. and/or Gpack General Packaging S.r.l. involving collections and payments or the management of loans:

- it is forbidden to promote, establish, organize, direct, finance, even indirectly, associations that propose the task, abroad or in any case to the detriment of a foreign State, an institution or international organizations, to carry out acts of violence against persons or property, for the purpose of terrorism;
- it is forbidden to give shelter or provide hospitality, means of transport, means of communication to people who participate in subversive associations or with the purpose of terrorism and subversion of public order.

Therefore, Gpack S.p.A. and Gpack General Packaging S.r.l. repudiate all forms of terrorism and intend to adopt, within the scope of the activities carried out, the appropriate measures to prevent the danger of involvement in acts of terrorism, so as to contribute to the affirmation of peace between peoples and democracy. To this end, the Companies undertake not to establish any relationship of a working or commercial nature with subjects, whether natural or legal persons, involved in acts of terrorism, as well as to non-financial or in any case facilitate any of their activities.

Rules of conduct for the prevention of computer crimes and unlawful data processing

It is forbidden to:

- alter public or private computer documents with probative value;
- abusively accessing the computer or telematic system of public or private entities;
- illegally access their computer or telematic system in order to alter and/or delete data and/or information;
- hold and misuse codes, keywords or other means suitable for accessing a computer or telematic system of competing public or private entities, in order to acquire confidential information;

- hold and abusively use codes, keywords or other means suitable for accessing their computer or telematic system in order to acquire confidential information;
- carry out procurement and/or production and/or dissemination of equipment and/or software in order to damage an IT or telematic system, of public or private subjects, the information, data or programs contained therein, or to facilitate the interruption, total or partial, or alteration of its operation;
- carry out fraudulent activities of interception, impediment or interruption of communications relating to an IT or telematic system of subjects, public or private, in order to acquire confidential information;
- install equipment for the interception, impediment or interruption of communications of public or private entities;
- carry out activities of modification and/or deletion of data, information or programs of private or public entities or in any case of public utility;
- carrying out activities of damage to information, data and computer or telematic programs of others;
- destroy, damage, render useless computer or telematic systems of public utility.

Objectives:

- *keep to zero ("0") the episodes of loss, leakage or hacking of personal and/or sensitive data that can be recorded annually;*
- *ensure that 100% of employees complete a training module related to information security and management by 2030;*
- *Conduct at least one IT security risk assessment at 100% of locations by 2030.*

Protection of Intellectual Property and Privacy

In carrying out development activities in order to obtain the best products for their customers, Gpack S.p.A. and Gpack General Packaging S.r.l. make significant investments in terms of intellectual property. The Companies protect their intellectual property rights by registering specific patents, trademarks or trade secrets and preventing their voluntary or involuntary disclosure. Gpack S.p.A. and Gpack General Packaging S.r.l. respect the intellectual property rights of others and refrain from any unfair competition, keeping the protection of the confidentiality of the data processed at heart.

Confidential information includes all information that is subject to data protection regulations, including data relating to employees and collaborators.

Monitoring compliance with the code of ethics

The control of compliance with the Code of Ethics is entrusted to the Supervisory Body appointed pursuant to Legislative Decree no. 231/2001. More specifically, the Supervisory Body is assigned, among others, the following tasks:

- monitor compliance with the Code of Ethics, with a view to avoiding the danger of committing the offences provided for by the Decree;
- formulate their observations on ethical issues that may arise in the context of corporate decisions and alleged violations of the Code of Ethics referred to it;
- operationally support in the interpretation and implementation of the Code of Ethics, as a constant reference tool for the correct conduct to be adopted during the performance of its activities;
- follow and coordinate the periodic review of the Code of Ethics, also through its own proposals for adaptation and/or updating;
- prepare and approve the communication and ethics training plan;
- report any violations of the Code of Ethics to the competent corporate bodies, suggesting the sanction to be imposed and verifying the effective application of any measures imposed.

Truccazzano, 30/09/2025

Alessandro Floris
CEO

