

TECNOSERVICE IMBALLAGGI SRL - CODE OF CONDUCT

The Company's objective in drafting this "Code of Conduct" is to promote integrity throughout the Company and in all its activities. "Integrity" means ethics, honesty and professionalism; it also means reliability and incorruptibility within the Company and among its employees and in actions towards all stakeholders to ensure corporate sustainability.

Therefore, this Code of Conduct is binding on all employees and is implemented accordingly in all its aspects. There may be times when ethical issues may arise; we therefore hope that this Code of Conduct will guide the employee to make decisions with integrity. Employees must strive to act in the best interests of the company as much as possible – always within the limits of the law – and it is their responsibility to prevent damage and loss in the interest of the company.

The Company expects all employees to abide by this "Code of Conduct" in carrying out their duties and functions to maintain public trust, ensure accountability to stakeholders, society and the environment, and ensure the Company's sustainable growth and development. The Company also expects to apply this "Code of Conduct" to subsidiaries, joint ventures, suppliers, customers and others working with the Company in order to promote sustainable development of the economy and society and to protect the environment.

A – ETHICS

- 1) The company follows local laws and regulations and supports relevant international standards, including the International Labour Office's Tripartite Declaration of Principles, the OECD Guidelines for Multinational Enterprises, the United Nations Global Compact, the United Nations Universal Declaration of Human Rights and the Responsible Business Alliance (RBA) Code of Conduct.

- 2) Business integrity as a general principle
 - the highest standards of integrity must be upheld in all business interactions
 - Fair competition is an important prerequisite for the functioning of free markets
 - The Company expects employees to adopt a zero-tolerance policy towards any form of bribery, corruption, extortion and embezzlement.

- 3) Refusal of any form of extortion or corruption
 - no bribes or other means of obtaining undue or improper advantage shall be promised, offered, authorized, given or accepted. This prohibition refers to promising, offering, authorizing, granting or accepting anything of value, directly or indirectly from a third party for the purpose of obtaining or retaining employment, directing business to any person or obtaining an improper advantage.
 - The Company undertakes to monitor and apply the procedures implemented to ensure compliance with anti-corruption laws.

- 4) Rejection of illegal agreements and collusions between companies
 - agreements and collusions between undertakings that may prevent, limit or distort competition are prohibited. This includes agreements on prices or other conditions, as well as agreements with the aim of allocating customers, market products or personnel
 - it is forbidden to exchange the information listed in the previous point with the competitors
 - the company also cannot illegally limit the presence on the market of its suppliers, customers, distributors and cannot abuse any dominant market position it may have

- 5) Prohibition of insider trading
 - Insider trading laws prohibit trading in securities (buying, shorting, or selling) while having knowledge of non-public information and prohibit disclosing non-public information to others who subsequently trade in the affected securities.
 - The potential consequences of violations of these laws, by directors, supervisors, officers and employees of the Company, as well as for those who receive inside information from such persons, include internal repercussions, but also civil liability, criminal penalties and possible prison sentences.

- 6) Transparency and disclosure of information
 - All business transactions must be conducted transparently and accurately reported in the company's accounting books and records.
 - Falsification of records or misrepresentation of conditions and procedures in the supply chain is unacceptable.
 - Information relating to company activities, health and safety, environmental practices, business activities, structure, financial situation and performance may be disclosed in accordance with relevant regulations and prevailing industry practices.

- 7) Intellectual property
 - Intellectual property rights must be respected; the transfer of technology and know-how must be carried out in a manner that protects intellectual property rights and in accordance with applicable laws
 - Customer and supplier information must be safeguarded.

- 8) Protection of company property
 - All employees must protect the company's assets and ensure their efficient use. Company assets, whether tangible or intangible, must be used only by authorized employees or designated persons and only for legitimate company business purposes.

- 9) Fair Trade, Advertising and Competition
 - Standards of commercial fairness, advertising and competition must be respected.

10) Identity protection and prohibition of retaliation

- The company offers programs that guarantee the confidentiality, anonymity and protection of suppliers and employees who report irregularities.
- The Company provides staff with a communication system so that employees can report any concerns without fear of retaliation.

11) Responsible sourcing of minerals

- The Company will adopt a reasonable policy to ensure that tantalum, tin, tungsten and gold in the products it manufactures do not finance or benefit, directly or indirectly, armed groups that perpetuate human rights abuses in the Democratic Republic of the Congo or any other country.
- Although cobalt and micas are not among the so-called “conflict minerals” or subject to existing good diligence requirements, the Company has voluntarily extended the application of this responsible sourcing program to these minerals as well, as cobalt and micas are increasingly being associated with serious human rights abuses.
- The company must exercise due diligence on the source and chain of custody of these minerals and make the due diligence measures available to customers upon request.

12) Privacy

- The Company is committed to protecting the reasonable expectations of privacy regarding the personal information of all those with whom the Company does business, including suppliers, customers, consumers and employees.

The Company complies with applicable laws and regulatory requirements regarding privacy and security of personal information whenever it is collected, stored, processed, transmitted and shared.

B – WORK

1) Free choice of work

- Forced, compulsory (including debt bondage) or indentured labour, involuntary prison labour or exploitation, slavery or human trafficking is prohibited.

This includes the transportation, harboring, recruitment, transfer or receipt of persons by threat, force, coercion, abduction or fraud to perform work or services.

- There will be no unreasonable restrictions on employee freedom of movement in the facility other than unreasonable restrictions on entry or exit from company-provided facilities.
- All work must be voluntary and employees must be free to leave the workplace at any time or terminate their employment in accordance with local law.
- The Company and those acting on behalf of the Company may not detain, destroy, conceal, confiscate or deny employees access to their identification or immigration documents, such as government-issued identification cards, passports or work permits, unless such detention is required by law.

In particular, the Company prohibits any form of slavery, practices similar to slavery, servitude or other forms of domination or oppression in the workplace, such as extreme economic or sexual exploitation and other forms of humiliation.

2) Prohibition of child labor

- The company prohibits child labor at all its sites.

The Employee Hiring Policy expressly states that the use of child labor (under 16 years of age) and the employment of a child under the age at which compulsory school education ends according to local laws is prohibited and prohibits any practice that may involve the use of child labor.

Specifically, the company prohibits the worst forms of child labor under the age of 18, including (ii) all forms of slavery or similar practices, such as the sale or trafficking of children, servitude and indebtedness, as well as forced or coerced labor, including forced or compulsory recruitment of children in armed conflict, (iii) using, procuring or offering a child for illicit activities, in particular for the production or trafficking of drugs, (iv) work which, by its nature or the circumstances in which it is carried out, may harm the health, morals or safety of children.

3) Working hours

- Workweeks must not exceed the maximum established by local law.
- Employees must be granted at least one day off in a seven-day week. In exceptional situations where the day off cannot be given due to emergency situations, employees will receive additional days off, as compensation, in accordance with local legislation.

4) Salaries and benefits

- Compensation paid to employees must provide a living wage and comply with all applicable wage laws, including those relating to minimum wages, overtime hours and statutory benefits.
- In accordance with local laws, employees must be compensated for overtime at rates established by local law and in accordance with contractual agreements between the Company and the employee. For each paid period, employees must be provided with a timely and understandable pay stub that includes sufficient information to verify the correct pay for the work performed.

5) Dignified treatment

- The company and all its shareholders respect the protection of human rights and support their application in daily business.
- There must be no harsh or inhuman treatment, including physical or psychological violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of employees, restrictions on freedom of movement; nor must there be the threat of such treatment.

- Disciplinary policies and procedures to support these requirements are clearly defined and communicated to employees
 - To the best of the Company's knowledge and ability, the Company shall avoid becoming an accomplice to or benefiting from all types of forced labor as set out in section (1).
 - In all its business actions, the company acknowledges and actively considers the potential implications of its activities and relationships in relation to human rights.
 - To the best of the Company's knowledge and power, it is prohibited to become complicit, to benefit directly or indirectly from human rights violations and to act accordingly as soon as it becomes aware of such actions.
- 6) Prohibition of Discrimination
- No employee shall be discriminated against because of characteristics that are unrelated to job requirements.
 - The Company's policy is that race, color, sex, age, sexual orientation, disability, nationality, social or ethnic origin, trade union membership, marital status, political position or religious belief shall not be a factor in employee hiring, evaluations and promotions, compensation, hours of work and rest, job security, assignment of work duties, training and opportunities, job prospects, social security and workplace health.
- Similarly, there must be no unfair or unequal treatment at work resulting from a personal health condition, unless it is justified by reasonable occupational, safety and health requirements at the workplace.
- 7) Freedom of association and bargaining
- In accordance with local law, the Company respects the right of all employees to form and join trade unions of their choice, to bargain collectively, and to engage in peaceful assembly, as well as the right of employees to refrain from such activities without fear of intimidation or reprisal, in accordance with national law.
 - Joining, forming or belonging to a trade union must not constitute a reason for retaliation or unjustified discrimination.
 - Trade unions are free to operate under applicable workplace law which includes the right to strike and collective bargaining.
 - Employees must not be discriminated against because of their membership in a trade union.
 - Union membership will not influence decisions on job applications, career advancement, termination or transfer decisions.
 - The Company does not interfere with the activities of workers' representatives while they carry out their functions without this damaging the smooth running of the Company's activities.
 - Workers and/or their representatives can communicate openly and share ideas and concerns with management regarding working conditions and management practices, without fear of discrimination, retaliation, intimidation or harassment.
 - Representative trade organizations for collective bargaining purposes are recognized at the bargaining table. Discussions, information and bargaining processes will be provided in a meaningful way. The use of collective

bargaining as a constructive forum to address issues of working conditions, terms of employment and relations between the company and employees is the intended purpose of collective bargaining.

- The bargaining process is intended to address, discuss and resolve issues in the following areas:
 - Renovation
 - Training
 - Dismissal procedures
 - Issues relating to workplace safety and health
 - Complaints and disputes
 - Liquidation procedures
 - Disciplinary rules
 - Family and community welfare
- 8) Private/public security forces
 - The Company prohibits the hiring or use of private or public security forces to protect a project if, due to lack of instruction or control by the Company, the use of security forces (i) violates the prohibition of torture and cruel, degrading and inhuman treatment, (ii) harms life, or physical safety, or (iii) restricts the right to free association and organization.

C - HEALTH AND SAFETY

- 1) Health and safety at work
 - Occupational safety requirements and health protection obligations must be respected.
 - Potential worker exposure to hazards (e.g. chemical, electrical and other energy agents; fires, vehicles, physical or biological substances and fall hazards) must be identified, assessed and controlled through appropriate analysis, engineering and administrative controls, preventive maintenance of the workplace, workstation and equipment, and through safe working procedures (including isolation and marking) and ongoing safety training and instructions.
 - Measures should be implemented to avoid excessive physical and mental fatigue due to to an inappropriate organization of work in terms of working hours and breaks.
 - Where hazards cannot be adequately controlled by these means, employees must be provided with suitable personal protective equipment in good condition together with information material on the risks associated with those hazards.
 - Reasonable measures must also be taken to remove pregnant or breastfeeding women from highly hazardous working conditions, remove or reduce any health and safety risks in the workplace for pregnant or breastfeeding women, including those associated with their duties, and provide suitable workstations for breastfeeding mothers.

- 2) Emergency preparedness
 - Potential emergency events and situations must be identified and assessed and their impact minimized by implementing emergency procedures and plans, including: emergency reporting, employee notification and evacuation procedures, employee training and drills, adequate smoke detection and fire suppression equipment, unobstructed emergency exits, and recovery plans.
- 3) Occupational accidents and diseases
 - Procedures and systems must be in place to prevent, manage, track and report work-related injuries and illnesses, including provisions to encourage employee reporting; classify and record incidents of injury and illness; arrange for necessary medical treatment in the event of an injury; investigate incidents and implement corrective actions to eliminate the causes and facilitate the return to work of employees
- 4) Industrial hygiene
 - Employee exposure to chemical, biological and physical agents must be identified, assessed and controlled according to a hierarchy of controls. Potential hazards must be eliminated or controlled through appropriate administrative, engineering and design controls.
 - Where hazards cannot be adequately controlled by such means, workers must be provided with and use appropriate and well-maintained personal protective equipment. Protection programs must include information materials on the risks associated with these hazards.
- 5) Physically demanding work
 - The company aims to identify, assess and control employee exposure to the risks of physically demanding activities, including manual handling and repetitive lifting of heavy materials, prolonged standing and highly repetitive or forced assembly activities.
- 6) Machine protection
 - Production machinery must be assessed for safety risks. Physical guards, locks and barriers must be fitted and maintained regularly where machinery presents a risk of injury to workers.
- 7) Health and Safety Communication
 - The Company shall provide employees with adequate workplace health and safety information and training in the employee's own language, or in a language the employee can understand, regarding identified workplace hazards to which employees are exposed, including but not limited to mechanical, electrical, chemical, fire and physical hazards.

- Health and safety information should be clearly posted in the factory or placed in a clearly identified location accessible to employees. Training should be provided to all employees prior to starting employment and updated regularly. Employees should be encouraged to report safety concerns.

D – ENVIRONMENT

1) Environmental permits and reports

- All required environmental permits (e.g. discharge monitoring), approvals and records must be obtained, maintained and updated; all their operational and reporting requirements must be met.

2) Prevention of pollution, reduction in the use of resources and protection of the natural foundations of life

- Emissions and discharges of pollutants and the generation of wastes shall be minimized or eliminated at source by practices such as the addition of pollution control equipment, modification of production, maintenance of facilities or by other means.
- The Company prohibits any activity that may damage the soil, pollute water sources, cause air pollution, dangerous noise emissions or excessive water consumption that (i) significantly damage the natural basis of food conservation and production, (ii) deny people access to clean and drinkable water, (iii) make it difficult for people to access health facilities or destroy them, (iv) harm the health of individuals

3) Hazardous substances

- Chemicals and other materials that pose a hazard to humans or the environment must be identified, labelled and managed to ensure their safe handling, storage, use, recycling or reuse and disposal.
- The company does not produce, use and/or dispose of mercury as it is prohibited by the Minamata Convention
- The company refrains from the production and/or use of prohibited substances (POPs) established by the Stockholm Convention as well as from the environmentally harmful management of waste containing POPs.
- The company refrains from importing/exporting hazardous waste as defined by Basel Convention

4) Air emissions

- Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated by manufacturing activities must be identified, regularly monitored, controlled and treated as required prior to discharge.

5) Material Restrictions

- The Company adheres to applicable laws, regulations and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labelling for recycling and disposal.

- 6) Energy consumption and greenhouse gas emissions
 - Energy consumption and all greenhouse gas emissions referred to in Sections 1 and 2 must be monitored and documented at company and/or individual plant level.
 - The company is continuously seeking cost-effective methods to improve energy efficiency and minimize energy consumption and greenhouse gas emissions.
- 7) Illegal violation of land rights
 - The Company refrains from any eviction and illegal appropriation of land, forests and water resources in the acquisition, development and other uses of land, forests and waterways, the use of which ensures the survival of the individual.

E – MANAGEMENT SYSTEM

The company's management systems shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements relating to the company's operations and products; (b) compliance with this Code of Conduct; and (c) identification and mitigation of operational risks related to this Code and should also facilitate continuous improvement. The characteristics that management systems embrace are listed below.

- 1) Corporate commitment
 - The Company supports corporate, environmental and social responsibility policy statements that affirm the Company's commitment to compliance, sustainability and continuous improvement, approved by Management and posted on the premises in the local language.
- 2) Management and managerial responsibility
 - The company has identified managers and company representatives who ensure the implementation of management systems and related programs
 - Periodic review of the management system by managers is conducted regularly
- 3) Risk assessment and management
 - The company has a process to identify legal, environmental, health and safety, labor practices and ethical compliance risks associated with its operations. This process includes a mechanism to determine the relative significance of each risk and the implementation of appropriate procedural and physical controls to address identified risks and ensure regulatory compliance
- 4) Training
 - Training programs are in place for managers and employees to implement the Company's policies, procedures and improvement objectives and to comply with applicable legal and regulatory requirements.

5) Communication

- The company has a process in place to provide clear and accurate information about the company's policies, practices, expectations and performance to employees, suppliers and customers.

6) Employee feedback, participation and complaints

- Ongoing processes, including an effective complaints mechanism, are in place to assess employee understanding and obtain feedback on breaches of the practices and conditions covered by this Code and to promote continuous improvement.

7) Audits and evaluations

- The Internal Control Committee conducts periodic self-assessments to ensure compliance with legal and regulatory requirements, the content of the Code and customer contractual requirements relating to social and environmental responsibility.

8) Documentation and Records

- The Company creates and maintains documents and records to ensure regulatory compliance and conformity to business requirements along with appropriate confidentiality to protect privacy.

9) Liability towards third parties (interested parties)

- The Company has established a process to communicate to third parties (customers, suppliers, shareholders), monitor and promote the requirements of the Code and their compliance with it.
- The long-term goal is to only work with business partners who comply with the requirements contained in this Code of Conduct.

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Campagnola Cremasca, 09/19/2024

TECNOSERVICE PACKAGING SRL

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