CODE OF ETHICS

This Code of Ethics is approved by the Management and is brought to the attention of corporate stakeholders by sending / transmitting it upon request.

SUMMARY

1	**GENERAL PRINCIPLES**
2	**PRINCIPLE OF LEGALITY**
2.1	Objectives and Values
2.2	Impartiality
2.3	Confidentiality
2.4	Fairness of Authority
2.5	Contractual Conduct
2.6	Competition
2.6.1	Acts of Commercial Courtesy
2.7	Suppliers
2.8	Political Conduct
2.9	Conduct with Institutional Bodies
2.10	Environmental Conduct
2.11	Safety Conduct
3	**ETHICAL PRINCIPLES**
3.1	Protection and Enhancement of Human Resources
3.2	Child and Underage Labor
3.3	Compulsory and Forced Labor
3.4	Freedom of Association
3.5	Discrimination
3.6	Disciplinary Practices
3.7	Working Hours
3.8	Remuneration
4	**MANAGEMENT SYSTEM**
4.1	Non-Conformity / Complaint Resolution
4.2	Implementation Mechanisms and Corrective Actions
5	**ASSUMPTION OF RESPONSIBILITY**

1. GENERAL PRINCIPLES

In order to make its corporate ethical principles ever more "concrete and effective," MECPLAST has established this Code of Ethics to translate these principles into its organizational policy choices.
The reference SA8000 model lists the requirements for socially responsible behavior of organizations toward interested parties (stakeholders), with particular reference to workers, specifically governing:

- child and underage labor,
- forced or compulsory labor,
- health and safety conditions,
- freedom of association and the right to collective bargaining,
- discrimination,
- disciplinary practices,
- working hours,
- remuneration.

The Organization is committed to adhering to and complying with:

- the International Labour Organization (ILO) Conventions;
- the United Nations Convention on the Rights of the Child and the Universal Declaration of Human Rights;
- all National and International Laws concerning workplace safety and privacy protection, confidentiality, and processing of personal data;
- the rules of conduct defined within its own Code of Ethics.

The Organization considers it proper to comply with these standards, not only to concretely demonstrate its duty to respect workers' human rights in every type of process and organization, but also to act as a promoter of these principles with its suppliers and partners.
The purpose of implementing this type of management system is to initiate a chain-reaction adaptation process to these standards by partners, suppliers, and sub-suppliers, striving to influence their behavior and increase their attention to ethical and social aspects.

To fulfill the commitments outlined above, the Organization undertakes to guarantee:

- constant monitoring and continuous improvement of its Management System;
- setting specific improvement objectives and verifying their achievement;
- the implementation and retention of documents and records, along with effective communication to all personnel;
- constant and adequate information provided to interested parties.

2. PRINCIPLE OF LEGALITY

The company complies with national and European laws, regulations, and all other legislation in force in the countries where it operates.

2.1 Objectives and Values

The main objective of the company is the protection of workers and the creation of value for stakeholders (e.g., profits, job retention, etc.), toward which the organization's strategies are oriented. To guide their decisions regarding the Organization's strategies, stakeholders require all available relevant information; the Organization creates the conditions necessary for widespread and informed participation of stakeholders in decisions within their competence, promoting equal access to information.

2.2 Impartiality

In decisions affecting relationships with its stakeholders, the Organization avoids all forms of discrimination based on nationality, race, health status, gender, political opinions, or religious beliefs.

2.3 Confidentiality

The Organization ensures the confidentiality of the information in its possession and refrains from seeking confidential data, except in cases of explicit and informed authorization.
In the event of processing personal and sensitive data, in accordance with EU Regulation 2016/679 (GDPR), the Organization adopts all necessary precautions and statutory requirements prescribed by law.

2.4 Fairness of Authority

In entering into and managing contractual relationships that involve hierarchical structures, especially with its collaborators, the Organization undertakes to ensure that authority is exercised with impartiality, fairness, and correctness, avoiding any abuse of power.
In particular, the Organization guarantees that authority does not transform into an exercise of power detrimental to the dignity and autonomy of the collaborator or stakeholder, and that work organization choices safeguard the value of collaborators and stakeholders.

2.5 Contractual Conduct

Contracts and work assignments must be performed in accordance with what was freely negotiated by the parties. The Organization undertakes not to abuse its contractual position.
In valid contracts, the Organization does not take advantage of contractual loopholes or unforeseen events to renegotiate the contract for the sole purpose of exploiting the position of dependency or weakness in which the other contracting party may find itself.
When formulating contracts, the Organization takes care to specify to the contracting party the behaviors to be maintained under all circumstances in a clear and understandable manner.

2.6 Competition

The company is committed to respecting applicable legislation regarding fair competition and antitrust regulations.
The Organization refrains from any collusive behavior or abuse of dominant position, providing full and rigorous compliance with antitrust rules and directives from market regulatory Authorities.

2.6.1 Acts of Commercial Courtesy

Any act of commercial courtesy, whether a gift, token of appreciation, benefit, or any other utility, is permitted only when it cannot be interpreted as intended to improperly acquire an advantage.
Individuals who receive gifts that cannot be attributed to ordinary relations of courtesy must inform their reference supervisor without delay.
In any case, regardless of the obligation to inform, the aforementioned individuals must decline the promised or offered utility, whether directed at themselves or their family members.

2.7 Suppliers

The Organization guarantees that relationships with customers and suppliers are conducted in compliance with the law and in application of the general principles of this Code of Ethics.
In particular, relationships with customers must be characterized by fairness, courtesy, and availability.
In supplier relationships, selection processes must be based on objective competitive comparison, avoiding any form of favoritism and/or discrimination. Through the Code of Ethics, the Organization establishes the minimum requirements with which suppliers must comply. Suppliers must align their management with respect for the SA8000 Standard, which will serve as a preferential condition for maintaining and strengthening relations with the Organization.
The Organization will act progressively toward its suppliers in order to achieve the following final objectives:

• Commitment to comply with all requirements within an agreed timeframe based on criticalities identified for suppliers belonging to categories designated as critical, as a decisive factor for continuing the relationship.

Where provided for by contractual agreements, the Organization aims to obtain commitment to:

- provide all stakeholders with information demonstrating compliance with the requirements of this Code of Ethics;

- grant all stakeholders access to their premises, upon agreement and schedule planning, to verify compliance with the requirements of this standard;
- request explicit agreement to the above points from their own sub-suppliers.

Regarding the action plan for suppliers, the Organization commits to:
• Perform second-party audits on the most critical suppliers where third-party audit results are not already available.

The Organization further undertakes to encourage its suppliers to:
• Extend knowledge of the standard's requirements and adherence to the same project to their own suppliers, conscious of the need to develop a culture and awareness surrounding social responsibility to make all efforts effective and efficient.
• Maintain accurate and comprehensive records regarding ethical issues for all suppliers with whom they interact on an ongoing basis.

2.8 Political Conduct

The Organization undertakes not to fund any political movement or party, whether in Italy or abroad, and does not sponsor political conventions or propaganda events.
Subject to the above, the Organization may fulfill requests for contributions limited to proposals originating from declared non-profit entities and associations with regular statutes and articles of incorporation.
Sponsorship activities, which may touch upon social, environmental, entertainment, sporting, and artistic themes, are intended solely for events offering guaranteed quality or projects to which the company can constructively contribute its experience.

2.9 Conduct with Institutional Bodies

All interactions with State or International institutions are exclusively attributable to forms of communication aimed at evaluating the implications of legislative and administrative activity on corporate operations.
In particular, all relationships with public service officials, to ensure maximum transparency, will be managed exclusively through representatives who have received an explicit mandate from the Organization.
The conduct of such representatives must adhere to criteria of loyalty and fairness, and always in respect of Public Institutions.
In dealings with the Public Administration (P.A.), it is strictly forbidden to offer gifts or money to Executives, Officials, or Employees of the P.A., or to their relatives, whether Italian or foreign.
The company considers acts of corruption to include both illicit payments made directly by Italian individuals/entities or their employees, and those executed through third parties acting on their behalf in Italy or abroad.
It is forbidden to offer and/or accept any object, service, performance, or favor to obtain or procure favorable treatment regarding any relationship maintained with the P.A.
During business negotiations, requests, and/or interactions with the P.A., the following actions must NOT be undertaken (directly or indirectly):
- examining and/or proposing commercial or employment opportunities that could personally benefit Public Administration employees;
- offering and/or providing gifts or tokens (of any type or nature);
- soliciting and/or obtaining confidential information that could compromise the integrity or reputation of either or both Parties.

2.10 Environmental Conduct

The environment is a primary good that the Organization is committed to safeguarding. To this end, the company complies with current legislation and structures its corporate and economic management in accordance with it and in alignment with the ISO 14001 organizational model, even if not currently formalised or certified within the Organization.

2.11 Safety Conduct

The Organization is committed to respecting current health and safety legislation in the workplace, and manages its corporate and economic activities in accordance with it and in alignment with the UNI 45001 organizational model, even if not currently formalised or certified within the Organization.
The Company is dedicated to spreading and consolidating a culture of safety, developing risk awareness, and promoting responsible behavior among all employees.
The company acts through preventive measures to preserve the health and safety of workers, ensuring the physical and moral integrity of staff, under working conditions that respect individual dignity.

3. ETHICAL PRINCIPLES

3.1 Protection and Enhancement of Human Resources

Human resources are considered a primary factor in achieving objectives by virtue of their professional contributions, within a relationship founded on loyalty, fairness, and mutual trust.
The Organization protects and promotes the value of human resources, encouraging professional growth, committing to preventing discrimination, guaranteeing equal opportunities, and offering working conditions that respect individual dignity as well as safe and healthy work environments, in compliance with active Regulations and Workers' rights.
Interpersonal relationships across various hierarchical levels must be marked by loyalty, equity, and fairness, based on the principles set forth above.

3.2 Child and Underage Labor

The Organization commits not to employ persons under 15 years of age.
The Organization commits not to employ young workers (individuals under 18 years of age) in unhealthy or hazardous situations, nor during school hours.
The Organization commits not to employ child labor in the production of any product or provision of any service, where child labor refers to work performed by persons under 15 years of age who are prevented from attending compulsory schooling and/or living a life suited to their age.
The Organization commits to ensuring underage workers genuine conditions for learning, professional growth, and development, as well as suitable health and safety conditions and related training.
The Organization undertakes to align its management with the following legislation: ILO Conventions 138 and ILO 182, Recommendation 146, Legislative Decree 81/08 as amended (including implementing decrees), Law 25/55, Law 977/67, Law 451/94, and the UN Convention on the Rights of the Child.

3.3 Compulsory and Forced Labor

The Organization condemns and does not resort to or support human trafficking.
The Organization commits not to employ personnel who perform work against their will or who are not free to terminate their employment contract.
The Organization commits not to employ non-voluntary personnel (prisoners, persons insolvent toward the Organization), persons subject to unlawful restrictions on their freedom to terminate employment (confiscation of documents, withheld wages held as security deposit), or persons not protected by a contract. In particular, the Organization commits not to utilize undeclared/unregistered labor and to ensure, in compliance with the law, workers' entitlement to take leave.
Management alignment with: ILO Conventions 29 and 105, Law 300/70, Law 108/90, Law 297/82, Legislative Decree 152/97.

3.4 Freedom of Association

The Organization undertakes not to prohibit, hinder, or penalize trade union activities, ensuring personnel appropriate workplace conditions to exercise this right.
The Organization commits to allowing workers to bargain freely and according to the law, without fear. The Organization guarantees freedom of union membership without exerting pressure on members, without discriminating in duties or career progression, recognizing elected representatives as key interlocutors, and ensuring them time and space to carry out union duties.
Management alignment with: ILO Conventions 87, 135, and 98.

3.5 Discrimination

The Organization is committed to guaranteeing equal opportunities for all workers:

- selecting workers based on skills and capabilities;
- treating all workers equally, offering them equal possibilities and terms regarding hiring, remuneration, training, promotion, dismissal, and retirement.

The Organization commits not to engage in or support discrimination based on race, social caste, nationality, religion, disability, gender, sexual orientation, union membership, or political affiliation. The organization does not tolerate threatening, offensive, exploitative, or sexually coercive behavior.
The Organization commits not to impede personnel in exercising their personal rights to follow principles or practices, or fulfill needs related to race, caste, nationality, religion, disability, gender, sexual orientation, union membership, or political party.
The Organization commits not to permit behavior, including gestures, language, or physical contact, that could be deemed sexually coercive, threatening, offensive, or exploitative.
Management alignment with: ILO Conventions 111, 100, 159, and 177; UN Convention on the Elimination of All Forms of Discrimination Against Women and Racial Discrimination; Law 300/70, Law 903/77, Law 125/91, Law 40/98, Law 53/2000, Legislative Decree 151/01, EEC Directives 75/117 and 76/207, Law 108/90.

3.6 Disciplinary Practices

The Organization commits not to apply disciplinary measures contrary to worker dignity and respect, limiting measures solely to those provided under applicable legislation.
The Organization commits to treating all workers with dignity and respect, strictly excluding any form of unusual or corporal disciplinary practice. Supplier disciplinary practices must comply with all local laws and worker regulations.
Care must be taken to ensure no occurrences of "psychological terror" or "sexual harassment"—namely psychological pressure or conditioning involving verbal or gestural allusions. The Organization commits not to use adverse working conditions as punitive measures, nor to adopt hasty or simplistic disciplinary measures.
Management alignment with: ILO Convention 29.

3.7 Working Hours

The Organization commits not to require work exceeding 40 hours per week, nor request more than 8 hours of overtime, agreed upon with the worker.
The Organization commits not to request overtime on a habitual basis. Working hours must comply with the total hours stipulated by the national collective labor agreement (CCNL), and overtime, when necessary, must be appropriately compensated and not exceed 8 hours weekly. In particular, it is essential to plan work carefully, streamlline production processes, and forecast necessary staffing accurately to avoid subjecting employees to excessive overtime and ensure full enjoyment of accrued leave.
Employees must be guaranteed at least one rest day every seven days.
Management alignment with: ILO Convention 98.

3.8 Remuneration

The Organization commits not to compensate workers with wages below statutory minimums, ensuring wages that afford a decent living standard.
The Organization guarantees remuneration compliant with all local laws in force, including minimum wage requirements, enabling a dignified quality of life.
Management alignment with: ILO Conventions 100 and 131, Law 300/70, Law 297/82, Law 863/84, Law 230/62.

4. MANAGEMENT SYSTEM

The Organization commits itself and requires its suppliers to:

- accurately record and monitor critical suppliers with whom ongoing business is conducted, to reinforce and disseminate ethical behavior principles;
- implement necessary corrective actions whenever required.

4.1 Non-Conformity / Complaint Resolution

All suppliers of the Organization are encouraged to manage non-conformities and complaints within an ISO 9001 perspective, through a structured process of identification, recording, root cause analysis, and resolution.
Where a non-conformity or complaint regarding a supplier could have a significant impact on the Organization, the supplier will be required to resolve it and communicate the outcome to the Organization.

4.2 Implementation Mechanisms and Corrective Actions

With reference to reports of potential violations of the principles contained in this Code of Ethics, individuals should contact Employee Representatives.
The Organization guarantees that no individual in the workplace will suffer retaliation, hardship, or discrimination of any kind for reporting violations of the Code of Ethics. Following a report, prompt investigations and appropriate corrective measures will be conducted.
Violation of the principles established in this Code compromises the relationship of trust between the Organization and its directors, employees, collaborators, and suppliers, and will be promptly pursued through appropriate measures.

Failure to comply with the principles listed in this Code of Ethics may constitute grounds for contractual termination. To protect its image and safeguard resources, the Organization will avoid entering into relationships with entities that do not operate in compliance with active legislation and the values of this Code.

5. ASSUMPTION OF RESPONSIBILITY

The principles set forth in this document must be understood and observed by all personnel and collaborators of the Organization. To this end, the Organization undertakes to provide necessary training and information on the contents of this corporate Code of Ethics.
Everyone's commitment is essential to achieving the highest level of ethical conduct. Any employee who wishes to report conduct contrary to the stated principles may do so by contacting Management.