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CORPORATE CODE OF ETHICS



GRUPPO VER PLAST

This document applies to all companies in the Group



CORPORATE CODE OF ETHICS

The company code of ethics was created to align our action with the core values and mission of the transformation strategy

“Becoming the most admired supply partner for our Customers”

Delight customers

We are focused on respecting the commitment made to the customer.

We work to improve the value chain by clearly understanding and stating the client's business objectives and aspirations, thus delivering and ensuring a long-term sustainable outcome.

We understand the value of confidentiality in managing information relating to customer activities and will not share it with third parties without the prior consent of the respective customers.

Engage employees

We have zero tolerance towards discrimination towards gender, caste, creed and religion.

We create an inclusive work culture that cultivates engaged, responsible and confident employees, providing equal opportunities for everyone to grow in their area of expertise, which is significant to the company's business objectives and employee staff development.

We understand the value of personal life and family, thus providing a balanced work culture to meet personal and community needs.

Ensure integrity

We ensure integrity at all levels by developing openness in every action.

We are committed to complying with all applicable laws, rules and regulations of the region/country by ensuring transparency in our trading and purchasing activities.

We understand the value of legitimacy in business and therefore refrain from offering or receiving inappropriate gifts or hospitality.

Encourage interested parties

We encourage our stakeholders by providing a fair view of the business growth area.

We conduct thoughtful and analytical market studies and hence are optimistic in driving the identified growth areas for the interest of the shake holders and customers.

We understand the value of stakeholder contributions to the growth and goals of our business and ensure positive growth for your investment.

Conserve the environment

We are committed to reducing, reusing and recycling the Earth's resources.



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We understand the value of creating a greener environment, so we educate and demonstrate sensible use of resources, promote green technologies and products to reduce your carbon footprint.



Core Values:

The core value shows the essence in which the company is built and the values we embrace

We appreciate,

- Integrity
- Honesty
- Opening
- Mutual respect
- Personal excellence
- Constructive self-criticism
- Continuous self-improvement

We are committed to our customers and partners and have a passion for technology.

We hold ourselves accountable to our customers, shareholders, partners and employees by honoring our commitments.

We aim for the highest quality.

We are committed to reducing, reusing and recycling the Earth's resources.

Transformation strategy

Transformation is a journey we have designed to achieve our mission and vision

Mission

“To be the supply partner most admired by our Customers”

Vision

World class organization
Complete solution provider
Employer of choice
Maximize returns for shareholders



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CORPORATE CODE OF ETHICS

This Code of Conduct helps us do just that. Explains our values and standards of business conduct. It explains how we will behave wherever we operate.

Read the Code of Conduct carefully. It is your responsibility to know it and live it. The Code of Conduct offers a practical and simple approach to understanding the fundamental rules that apply to our business and the personal responsibility that each of us has towards ourselves, towards others and towards VER PLAST.

Each of us is personally responsible for understanding and abiding by our Code. Nobody can do it for you.

Our Code of Conduct is a summary of how we do business. The Code applies to all officers, directors, full-time or part-time and temporary employees of VER PLAST as well as to all representatives, consultants and agents. Any exceptions to this Code of Conduct for executive directors or directors may be granted exclusively by the Board of Directors of VER PLAST and will be communicated to the shareholders.

This Code will not give you an answer for every situation. If you have any questions, please seek further guidance. If you have any doubts about the right thing to do, there are several ways to get your questions answered.

Focus on integrity and inclusion

The focus on integrity and inclusion is more than just the name of our Code of Conduct. Explains our approach to business ethics.

Integrity is about how we live by our values.

Inclusion means treating every person with dignity and respect and ensuring that everyone has the opportunity to succeed and contribute to the overall success of our business.

Today's business requires more openness and trust than ever before. The message is clear. In today's business world, it's not just what you achieve, but also how you achieve it.

Our goal is to be a truly customer-centric company. We want to offer services that make it convenient, efficient and cost-effective for customers to do business with us. To be successful, we must all focus on doing:

1. the right thing,
2. for the right reason,
3. in the right direction.

Employees

The key to our company's success is building trust and mutual respect and becoming a workplace where every employee's contribution is valued.

Each employee is expected to work cooperatively with each other. Our goal is to become a workplace where the contribution of every employee is valued.

What do we do:

- Respect the dignity of every individual
- Listen openly to concerns and suggestions
- Approach disagreements with an open mind
- Follow all applicable policies, laws and rules that govern our work
- Report criminal activity and policy violations immediately



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Important information you need to know:

Reciprocal Respect

When we work together, we value teamwork, dignity and mutual civility. We appreciate our differences.

Even Occupation Opportunity

It is VER PLAST policy and the responsibility of every VER PLAST employee to treat our colleagues fairly and with dignity. VER PLAST is an employer that guarantees equal opportunities and is committed to creating an environment free of discrimination. The Company will provide equal employment opportunities to all persons by placing the most qualified individual in each job, without regard to race, color, sex, pregnancy, sexual orientation, gender identity, religion, marital status, age, national origin, disability, veteran status, citizenship status, union support, or other protected group status. This policy applies to all terms and conditions of employment, including hiring, placement, promotion, demotion, transfer, recall, recruiting, hiring advertising, layoff or layoff, rate of pay or other compensation, and selection for training .

Diversity AND Inclusion

We want to provide a positive workplace where all individuals can grow, contribute and participate. We are committed to ensuring that every person has the opportunity to succeed and grow and contribute to the overall success of our business.

Each of us is responsible for creating a work environment where everyone is treated with honesty, dignity and courtesy.

Harassment

At VER PLAST, verbal or physical behavior that targets an employee because of their race, color, sex, sexual orientation, pregnancy, gender identity, religion, marital status, age, national origin, disability will not be tolerated. Each of us has the right to be free from discriminatory, abusive, offensive or otherwise unprofessional behavior at work. VER PLAST employees, customers, vendors and visitors will be treated with dignity, courtesy and fairness. Conduct that violates the Company's harassment policy may result in disciplinary action. Each of us will exercise good judgment in dealing with our colleagues.

If you experience or observe harassment in the workplace, immediately report the incident to your supervisor, the Human Resources department, the Corporate Ethics and Compliance department, the Legal department, the Business department, or any member of management.

Safety

The safety of VER PLAST employees and the safe operation of VER PLAST equipment is always a primary objective. All employees, without exception, are responsible for ensuring that all VER PLAST operations are conducted safely. Employees are expected to observe all safety rules and practices and follow instructions regarding safe and efficient work practices.

VER PLAST and its employees must remain committed to taking all reasonable measures to preserve and improve the environment, public health and safety.

Employees must immediately report any accident, illness, or work-related condition or unsafe practice to an appropriate supervisor or manager, the Corporate Safety Department, or the Corporate Ethics and Compliance Department.

Quality

Quality services and products that meet or exceed our customers' expectations will distinguish VER PLAST from the competition and ensure our future success. It is our responsibility to understand our customers' needs and



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satisfy them with quality products and services. It is our responsibility to understand our customers' needs and satisfy them with quality products and services.

Alcohol and illegal drugs

We maintain a workplace free from the effects of illegal or improper use of drugs and alcohol. Such activities threaten our ability to serve our customers and compromise the safety of our employees. VER PLAST will not tolerate the sale, distribution, illegal use or abuse of drugs or alcohol while employees are engaged in company business or while working on a company premises, except for the reasonable consumption of alcohol at an event sponsored by the Company and approved by senior management. If a prescription drug interferes with your ability to do your job, you should report it to your immediate supervisor or the Human Resources Department.

Violence in the workplace

We are committed to providing a safe working environment for everyone. VER PLAST has a zero tolerance policy towards acts of violence and verbal or physical behavior that could lead to or cause violence in the workplace. VER PLAST does not tolerate violent behavior in the workplace, committed by or against our employees. Prohibited behavior includes: making threats of violence or threatening comments, causing physical injury to someone else, intentionally damaging someone else's property or the Company's property, vandalism, sabotage, and/or acting aggressively in a manner that would reasonably cause to someone else to fear injury. Everyone has a responsibility to be alert to violent or illegal behavior in the workplace and to immediately report any threats of violence or threatening remarks or comments as diligently as you report actual violent actions. For the protection of all employees and others who may be affected, employees are encouraged to go the extra mile in reporting all concerns.

If you observe behavior that is or may become violent or dangerous, use common sense and notify your supervisor, manager, company security or human resources department.

Confidential information

Confidential and proprietary information is a valuable asset of VER PLAST. This includes, among other things; pricing and cost data, merger, acquisition and divestiture information, proprietary business processes and procedures, trade secrets and know-how, computer programs, marketing and sales programs, and certain customer/supplier/subcontractor information.

Confidential information as defined herein shall be used only as directed by the Company or as otherwise protected by law and shall be stored only in locations authorized and secured by the Company, with limited access. It can never be used for personal gain. Confidential information should be shared only with persons who are authorized to see it and who need such information to carry out work for VER PLAST. Confidential information as defined herein shall not be shared with anyone outside of VER PLAST unless they have a legitimate business relationship with VER PLAST, need to know the information to conduct business with us and such disclosure is not otherwise prohibited by applicable law or an agreement with a third party. Inappropriate or unauthorized disclosure of confidential information could harm our business and that of our customers, suppliers and subcontractors. Disclosure of confidential information as defined herein, in some cases, may also violate the law and could result in fines, penalties or legal action against VER PLAST and/or the persons involved.

You have a personal duty and responsibility to protect our confidential information as part of your business relationship with VER PLAST. This obligation continues even after the termination of your relationship with VER PLAST.

Conflict of interest

Given your employment with the Company, you should recognize your responsibility to avoid any conflict between your personal interests and those of the Company (examples are provided below). A conflict of interest occurs when our personal interests interfere, or appear to interfere, with your ability to make sound business decisions

on behalf of the Company. There are some common relationships or circumstances that may create, or give the appearance of, a conflict of interest. The situations generally involve gifts, business or financial relationships, or investments. Conflicts of interest occur when an employee is in a position to use their position at VER PLAST, or their relationship with another individual, to their own advantage. For example, an employee has a personal relationship with a customer, competitor, or supplier with whom the Company does business.

Use of company assets

VER PLAST resources are intended to be used in ways that benefit our Company. We must preserve these assets and use them wisely. Personal use of Company equipment, supplies, materials and facilities, or the taking of Company-owned equipment off Company premises for personal use, is generally not permitted and must be approved by the Company or your manager and/or Human Resources representative.

Accepting gifts

You should never accept gifts that appear to undermine or influence good business sense. You should never solicit gifts or favors from people with whom we do business. Occasionally, you may accept novelty, promotional items of nominal value, or modest gifts if all of the following are true:

- The gift complies with the donor's business rules.
- This only happens occasionally.
- The gift was not requested.
- Open disclosure of the gift would not embarrass our Company or the individuals involved.

The value of the gift is less than 2500 Indian Rupees.

It is acceptable to accept cash as a tip during the holiday season. However, you should never ask for a tip. Tips should be given as actual gifts and not as payments or in anticipation of extra services or pickups. To comply with state and local gift regulations, local management may implement a more stringent standard than the standard identified above.

Accept entertainment

You may accept an occasional invitation to a sporting activity, entertainment or meal in connection with your employment at VER PLAST if:

- The gift complies with the donor's business rules.
- The gift was not requested.
- The activity is infrequent and of reasonable and not excessive value.
- Disclosure of the activity would not embarrass our Company or the individuals involved.

Your supervisor approves the task in advance.

“High profile” events such as a very popular concert or sporting event, elaborate entertainment, or any other high-cost event must be approved by the Supervisor prior to acceptance.

We have a responsibility to accurately report all business information, such as hours worked, Department of Transportation records, employment records, business and travel expenses, shipping and receiving data, and financial data in a timely and accurate manner.

Copyrights, patents and trademarks

Our intellectual property is a valuable asset. This includes copyrights, patents and trademarks. We respect and protect intellectual property, whether ours or others. Comply with all copyright and other intellectual property laws. To protect the Company and yours, it is critical that you show due respect for laws governing copyright, fair use of copyrighted material owned by others, trademarks, and other intellectual property, including author, the brands and trademarks of the Company. .

Use of electronic and information technologies

The electronic and/or information technologies provided by the Company, including electronic mail, voice mail, cellular telephones, computers, computer networks, software, Internet access, or other electronic services are the property of the Company. Personal use of the telephone system, email, Internet access and voicemail provided by the Company during non-business hours is acceptable so long as it is not used for discriminatory or otherwise unlawful purposes and so long as it does not adversely interfere with the activities of the production employee. Employees should not use the Company's computers, networks, or network connections to Internet services during working hours to engage in certain personal activities, such as running a part-time business or sending chain messages.

When the Company grants you access to its systems and networks, you are assigned an individual login account with a confidential password. You are personally responsible for all activities that occur using your assigned account. Company policy requires that you maintain the confidentiality of your password for compliance and for your personal protection. You should never share this password or allow another person to use your account.

Company systems must not be used to create, store or transmit information that is abusive, threatening, harmful, illegal, sexually explicit, harassing, discriminatory or hostile because of a class, status or protected characteristic. Employees will not knowingly use Company systems to send, receive, store or forward messages containing such information. Websites that contain illegal, sexually explicit, adult or discriminatory content are also unacceptable and may not be accessed using Company equipment or networks.

Our computers will be used in accordance with applicable software agreements, copyright, trademark, patent and other laws. Employees must not duplicate, install or use software in violation of applicable copyright or license terms. Unless permission is obtained from the copyright owner, employees may not make copies of electronic data.

Company systems must not be used to create, store or transmit information that is abusive, threatening, harmful, illegal, sexually explicit, harassing, discriminatory or hostile.

Anti-corruption policy

The VERPLAST GROUP prohibits corruption without any exceptions.

In particular it prohibits:

- offer, promise, give, pay, authorize someone to give or pay, directly or indirectly, an economic advantage or other benefit to a Public Official or a private individual;
- accept the request, or solicitations, or authorize someone to accept or solicit, directly or indirectly, an economic advantage or other benefit from a Public Official or a private individual;
- induce a Public Official or a private individual to improperly carry out any function of a public nature or any activity connected to a business or reward him for carrying it out;
- influence an official act (or omission) of a Public Official or any decision in violation of an official duty;
- obtain, secure or retain an unfair business or advantage in connection with business;
- in any case violate applicable laws.

The offering or receipt of an economic advantage or other benefit in relation to business activity constitutes prohibited conduct.

This prohibition is not limited to cash payments and includes, for corruption purposes:

- gifts ;
- costs for third-party care, meals and transport;

- contributions in kind, such as sponsorships;
- business, jobs or investment opportunities;
- confidential information that may be used to trade regulated securities and products;
- personal discounts or credits;
- assistance or support for family members;
- other advantages or other benefits.

Gifts, payments, expenses, hospitality or other benefits may be given or received if they fall within the scope of commercial courtesy and are such as not to compromise the integrity and reputation of either party and such that they cannot be interpreted as intended to create an obligation of gratitude or to acquire undue advantages.

All gifts, financial benefits or other benefits offered or received must be recorded and supported by appropriate documentation, be made in connection with legitimate business purposes and in good faith, reasonable in the circumstances, in accordance with generally accepted standards of professional courtesy, in compliance with local laws and regulations and in any case must not consist of monetary payments, nor be motivated by the desire to exercise illicit influence or by expectations of reciprocity.

No performance must be imposed or accepted if it can be obtained exclusively by compromising the ethical standards of the GROUP.

Personnel who violate this company policy may be subject to disciplinary measures and any other action necessary to protect the interests of the Company.

Any deviation from the behavioral protocols described and violation of the policy must be communicated to the Management.

How to report a concern

Staff are free to immediately report any concerns or suspicions in relation to corruption.

If you believe or suspect that corruption is occurring, staff should feel free to speak to their manager immediately, even if they are unsure of what to make of a particular behavior.

Treatment of child labor

At VER PLAST, child labor is prohibited. The minimum age for admission to work cannot be lower than the compulsory school leaving age of 16, except for the execution of training courses promoted by educational institutions.

Benefits and salary payments

At VER PLAST the salary is monthly and is paid regularly and respects the contents of the National Collective Labor Agreement for the metalworking sector.

The elements that make up the salary are listed on the pay slip and divided into:

- direct remuneration, linked to the service rendered;
- indirect remuneration, not directly linked to the hours worked but due following the occurrence of particular events and/or contractual provisions (e.g. thirteenth month's pay, holidays, sickness, leave, etc.);
- deferred compensation, which accrues periodically but is paid retroactively (generally severance pay).

The salary established by the reference CCNL represents the "gross salary" to which the necessary tax withholdings (e.g. IRPEF) and social security (INAIL and INPS) must be applied to calculate the "net salary".

The IRPEF is withheld monthly by the employer as a withholding tax, together with the municipal and regional additional taxes (the necessary adjustments are made every year when the tax return form is sent). partly paid by the worker, by deduction from the pay slip, and partly paid by the employer.

Working hours

The weekly timetable is indicated in Legislative Decree 66/2003 which in art. 3. The law, in fact, sets the overall working hours, in general, at 40 hours per week over 6 days or 5 days, depending on the type of collective bargaining agreement.

I VER PLAST the maximum weekly duration of ordinary work is 40 hours over 5 days.

All employees, as defined by the collective agreement applied, have the right to a work break if the daily working time exceeds 6 hours.

Overtime work means activity carried out beyond normal weekly working hours. overtime work must be calculated separately from the remuneration linked to normal working hours, and must be compensated with the higher remuneration provided for by the collective labor agreement.

Right to freedom of association

Freedom of association and the right to collective bargaining offer opportunities for constructive dialogue and not just discussion, and focusing on solutions is an advantage for companies, for VER PLAST in particular.

Fight against organized crime

As a fundamental principle, which both employees and suppliers of VER PLAST must adhere to . The use and recourse to forced labor of any nature is expressly prohibited.

VER PLAST expects its suppliers to fully comply with all national laws and regulations in force in the country in which they operate and to treat their workforce fairly and with respect. To ensure that suppliers adhere to and comply with our company's standards, the commercial agreement includes a clause that governs our contractual relationship with suppliers. This clause states that suppliers must comply with our Supplier Code of Conduct and all applicable laws and regulations, including national and international laws prohibiting any type of forced or slave labor (such as slavery and human trafficking) .

Human trafficking and forced labor

VER PLAST is committed to complying with regulations prohibiting human trafficking and complying with all applicable laws in the countries in which it operates. It must refrain from violating the rights of others and avoid any negative impact on human rights during its activities.

The Organization undertakes to:

- Do not use or advocate the use of forced and compulsory labor under ILO Convention 29.
- Do not require you to pay deposits or present original identification documents upon hiring.
- Do not withhold any part of workers' wages or property or documents in order to force them to continue working for the company.
- To allow staff to leave the workplace premises after completing their shift.
- To allow employees to terminate their employment, provided they provide the employer with reasonable notice.
- Do not engage in or support human trafficking or permit it by any entity that provides work for their organization.

Clients

Our customers are the reason we exist. Engaging our customers by meeting their needs and expectations is essential to our success.

What do we do:

1. Provide quality products and services
2. Meets or exceeds expectations
3. Communicate honestly and correctly.

Important information you need to know:

Bribes and bribes

A bribe or bribe is the offer or acceptance of money, fees, commissions, credit, gifts, favors, or anything of value provided directly or indirectly in exchange for favorable treatment. We never offer, give, ask for or accept any form of bribe or bribe. We want our customers to use our services and products for their value, not because they have received “something extra” extra. No bribes or kickbacks in any form will be tolerated.

Business customers: gifts

We compete solely on the merits of our products and services. We do not persuade business customers to buy from us by offering gifts. We may provide advertising or promotional news or other items that meet the following guidelines:

- Not to exceed Rs 2500 Indian Rupees.
- Do not violate any applicable laws or regulations.
- They are not given to government officials or employees.
- They are not intended to influence the recipient's decision to award or retain business with us.
- We are not solicited.
- If disclosed, it would not embarrass our company, the recipient, or any of the individuals involved.
- They are rare in nature.

Community and environment

We want to improve the quality of life in our communities. We are committed to being a trusted and valued partner to the community, improving the quality of life in the areas where we live and work.

What do we do:

1. Safeguard the environment and our natural resources
2. They are good corporate citizens
3. Support organizations that improve the environment and provide environmental education, while encouraging employee volunteerism.

Important information you need to know:

Environmental practices

VER PLAST is committed to conducting business in a way that respects, preserves and improves the environment. To do this, we are committed to:

- Conduct our services in an environmentally responsible manner.
- Use energy wisely and efficiently in our operations.
- Comply with all environmental laws and regulations, company policies and professional standards of good industry practice.
- Use technologies and operational procedures designed to minimize health and safety risks.
- Encourage employees to report any conditions that may pose a danger to the environment, health or safety.

Furthermore, an adequate environmental management system has been implemented.

VER PLAST is committed to operating in such a way as to actively manage risk, conserve natural resources and protect the environment in the countries in which it operates by implementing an environmental policy that takes into account:

- Rights to land, forest and water and forced eviction.
- Reduction in Greenhouse Gas Emissions.
- Energy efficiency.
- Renewable energies.
- Decarbonization.
- Water quality, consumption and management.
- Air quality.
- Soil quality.
- Responsible management of chemicals.
- Waste reduction.
- Reuse and recycling.
- Animal welfare.
- Biodiversity, land use and deforestation.
- Acoustic emissions.

Corporate citizenship

VER PLAST is a company with a deep commitment to making a difference for the environment, for communities and for people. We behave safely and responsibly, while helping to build better communities, respecting and protecting our natural resources, respecting and protecting our people, and doing the right thing.

Community relations

VER PLAST is committed to partnering with the communities we serve and focusing our efforts on programs that make our communities cleaner, safer and stronger. We also enthusiastically lend our support and services to causes that promote civic pride, economic development and education. We are committed to conducting our business in a way that respects, preserves and improves the environment.

Providers

We maintain good relationships with our suppliers. They are our partners.

What do we do:

1. Select suppliers fairly and objectively.
2. Approach contract negotiations honestly and directly.
3. Collaborate with our suppliers to honor our commitments.

4. Demonstrate good business judgment.

Important information you need to know:

Choice of suppliers

VER PLAST selects the suppliers that best meet our needs using five key objective criteria:

- Product and technological leadership,
- Servant leadership and support,
- Quality, including supplier commitment and a history of compliance with applicable laws, rules and regulations,
- Delivery and delivery times,
- Total cost performance.

Where a competitive offer is required, we evaluate all proposals fairly and all information obtained from suppliers is treated by VER PLAST as highly confidential.

Contract negotiation

During contract negotiations with a supplier or potential supplier, we are honest and reasonable. We follow all applicable laws and regulations and support good business practices.

Supplier diversity

VER PLAST is committed to identifying and increasing procurement spending with minority/women-owned businesses and small, disadvantaged businesses.

Supplier information

We do not share confidential information provided to us by our suppliers with parties outside of VER PLAST unless indicated in writing by the supplier. During contract negotiations with a supplier or potential supplier, we are honest and reasonable.

Use of private or public security forces

Suppliers who may be required to hire private security contractors to protect their workers where the government is unable (due to resources or other constraints) to provide adequate police protection. In such circumstances, companies must ensure that clear and strict operational procedures and terms of employment are established by private security contractors before conducting any security operation.

The use of private security contractors may involve risks, including that private security forces violate the vendor's operating procedures or rules of engagement. This can culminate in inappropriate use of force, violence against women and children and even abuses of international humanitarian law.

If a private security contractor violates operational procedures or rules of engagement, the contractor must have clear procedures in place to record and document any incidents.

The supplier must therefore ensure that it establishes a complaints mechanism for local communities or other interested parties to lodge complaints about the actions of contracted private security forces. This complaints mechanism must be clear, transparent and accessible and also appropriately address cultural or religious sensitivities.

In the event that a private security contractor is found to have acted outside of operational procedure or rules of engagement, the organization must consider terminating the vendor and hiring a new vendor or other remedies, depending on the case.

Environment

Suppliers must establish an appropriate management system for the environment.

Suppliers are also expected to operate in a manner that actively manages risk, conserves natural resources and protects the environment in the countries in which they operate.

Additionally, suppliers must implement policies on:

- Rights to land, forest and water and forced eviction.
- Reduction in Greenhouse Gas Emissions.
- Energy efficiency.
- Renewable energies.
- Decarbonization.
- Water quality, consumption and management.
- Air quality.
- Soil quality.
- Responsible management of chemicals.
- Waste reduction.
- Reuse and recycling.
- Animal welfare.
- Biodiversity, land use and deforestation.
- Acoustic emissions.

Government officials and regulatory agencies

We work closely with government regulators to ensure our business practices are legal.

What do we do:

1. Comply with both the spirit and letter of the law.
2. Conduct our interactions with honesty and integrity.

Important information you need to know:

Political activities

VER PLAST encourages employees to participate in political activities in their free time and at their own expense. You will never pressure colleagues during work hours to support or contribute time or money to a political candidate or cause (such as seeking support from a presidential candidate). When we participate in political activities, we do so as individual citizens. Never give the impression that you are speaking on behalf of VER PLAST.

Shareholders

Our shareholders own our business. We must maintain their respect and trust.

What do we do:

1. Operate our business ethically and profitably.
2. Protect company property and information.
3. Communicate regularly through established channels.

Important information you need to know:

Performance

The long-term success of our company is directly related to the performance of each of us individually and together as a team. Therefore, each of us must contribute as best we can to the success of our Company.

Competitors

We practice fair, open and legal competition.

What do we do:

- Obtain information fairly and legally.
- Treat competitors with respect.
- Promote open and vigorous competition.

Important information you need to know:

Gathering competitive information

We always respect the proprietary information and trade secrets of others, including former employers.

To keep up to date with developments in our industry, we have a responsibility and right to obtain information about other companies, including those with which we compete.

We obtain this information through public, ethical and legal means, such as public conferences and documents, magazines, trade journals and other published and written information. Any market or competitive investigation must be approved by senior management and conducted in accordance with accepted industry standards for investigations. Prices, terms and other market information may be obtained or provided to customers and suppliers in the course of normal discussions or negotiations. In limited circumstances, this may also occur with competitors in connection with subcontracts or other proposals to provide or obtain services or goods. We never seek information through improper means, such as hacking into websites or computer systems with limited access, illegal pretexts, burglary, espionage or wiretapping.

We always respect the proprietary information and trade secrets of others.

Fair competition and antitrust

We refrain from business practices such as cartels, market sharing, or production or sales restrictions that constitute a violation of competition laws.

In particular:

- we do not enter into contracts or agreements with competitors in order to limit dynamic and fair competition with and between them;
- we independently determine the prices and conditions of sale of our products and others sell the company's products at a price lower than their production cost;
- we do not use the relationships between VER PLAST and customers to induce them to negotiate unfairly with competitors.

In the context of fair competition, VER PLAST respects the intellectual property rights of third parties; therefore collaborators are prohibited from requesting existing violations of these rights (trademarks, designs and models, utility models, patents, copyright) or acts of unfair competition, such as for example the slavish imitation of third party products.

Price fixing

We do not agree with our competitors to set the prices or terms of sale that customers will be charged. This includes price levels, pricing methods or policies, timing of price changes, offer information, profits or profit margins, terms or conditions of sale and/or supply of a product or service. Our prices and bid amounts must be established independently without consulting a competitor. Even when there may be perfectly legitimate reasons for communicating with a competitor, we are careful to avoid even the appearance of misconduct.

Customer assignment

We do not agree or argue with our competitors about how to divide or allocate customers to limit trade. However, we may make reasonable non-compete/non-solicitation agreements in business sales agreements, joint ventures, or executive employment agreements after receiving advice and approval from the Legal Department.

Offers

We do not agree or discuss with our competitors whether or not we will bid on a contract, or how much we will bid on a contract. Subject to consultation with and approval of the Legal Department, we may jointly bid on a contract with one or more competitors, or we may agree to subcontract work, or act as a subcontractor, to a competitor in connection with a bid.

Reporting Known or Perceived Violations

You should report any known or perceived violations of laws, regulations, company policies or our Code of Conduct, and you may report such violations to your supervisor, human resources manager or local consultant. VER PLAST also provides anonymous and confidential ways to report such concerns. By identifying problems or asking for help, you enhance our reputation for integrity, honesty and trust and ensure that our Code of Conduct is followed and enforced.

When should you speak? When you:

- We believe that our values, our Code of Conduct or our policies are not being followed.
- Thinking that laws, regulations or permit conditions are not being followed.
- Thinking there is an accounting irregularity or audit violation.
- He thinks there has been theft, fraud or embezzlement.
- You have a question or concern.
- Are aware of a conflict of interest or potential conflict of interest.

You have plenty of people to talk to if you need help. Keeping things to yourself will not solve them and will not help VER PLAST continue to be a leader in ethics and integrity.

Reports must be made in good faith. We review all reported concerns. Anyone who knowingly makes a false report, threatens others, or intentionally damages another person's reputation will be subject to disciplinary action, up to and including dismissal.

We keep reports of ethical issues confidential. We only advise people who need to know about a reported incident to ensure immediate and appropriate action is taken.

We respond immediately to reports of illegal activities, security issues, accounting or auditing irregularities, violations of company policies or health and safety issues by working with the appropriate investigative teams. If we find violations of laws, regulations, policies or our Code of Conduct, we take immediate action. We will make changes so similar problems do not happen again.



CORPORATE CODE OF ETHICS

VER PLAST prohibits retaliation against anyone who reports a concern. Never hesitate to call supervisors if you feel you have been retaliated against for speaking out. Individuals who engage in retaliatory behavior will be subject to disciplinary action, up to and including termination. We take allegations of retaliation seriously. Allegations of retaliation will be investigated and appropriate action will be taken.

Leini, 09 April 2024

The Direction

VER PLAST GROUP