

## CODE OF ETHICS

### Code of ethics

#### Stazione Sperimentale del Vetro S.c.p.A.

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## CODE OF ETHICS

### Sommario

Preamble

1. Introduction
2. Parties to which the provisions of the Code apply
3. Scope and consequences of violations of the Code
4. Business Values
  - 4.1. Legality
  - 4.2. Transparency, fairness and loyalty
  - 4.3. Good faith
  - 4.4. Non-discrimination and equal opportunities
  - 4.5. Diligence
  - 4.6. Respect and protection of the environment
  - 4.7. Health and Safety at Work
  - 4.8. Quality of services offered and customer satisfaction
  - 4.9. Reputation
  - 4.10. Privacy protection
  - 4.11. Conflict of interest
  - 4.12. Independence of judgment and duty of confidentiality
  - 4.13. Intellectual Property
  - 4.14. Centrality and Human Resources Enhancement
  - 4.15. Environment and waste
  - 4.16. Prevention of corruption
  - 4.17. Transparency and traceability
5. Behavioural principles
  - 5.1. Professional commitment
  - 5.2. Respect for people
  - 5.3. Integrity
  - 5.4. Loyalty
  - 5.5. Solidarity
6. Rules of conduct between the parties
  - 6.1. Rules of conduct with staff
  - 6.2. Rules of conduct with customers
  - 6.3. Rules of conduct with third parties
  - 6.4. Rules of conduct with suppliers
  - 6.5. Rules of conduct with public institutions
  - 6.6. Rules of conduct with trade unions
  - 6.7. Standards of conduct with Internal and External Auditors and other control bodies
  - 6.8. Rules of conduct with the competition
  - 6.9. Interpersonal relations in the working environment
7. Communication and management of information
  - 7.1. Corporate communications
  - 7.2. Transparency of financial reporting
8. Model of implementation of the Code of Ethics
  - 8.1. Adoption and updating of the Code of Ethics and transmission of reports of violation
  - 8.2. Disciplinary system
  - 8.3. Knowledge and application
  - 8.4. Review of the code of ethics

## CODE OF ETHICS

### Preamble

This Code of Ethics, adopted by the Board of Directors of Stazione Sperimentale del Vetro S.c.p.A (hereinafter called "Company") defines the principles of action that govern the activities of all personnel in the exercise of their functions, contributing to the achievement of responsible and sustainable development of the Company, as well as being intended as a tool for the prevention of possible crimes according to Legislative Decree 231/2001 and Law 190/2012.

### 1. Introduction

The Code of Ethics has the purpose of defining, formalizing and sharing the set of ethical values which inspire the Group, whose observance by the Recipients contributes to the proper functioning and safeguarding of the Group's reputation.

The purpose is to share the same values and to make them a point of reference for decision-making and for the behaviour of those who work within the organization at any hierarchical level. In this context, compliance with the principles set out in the Code of Ethics represents an effective way to prevent, detect and act against violation of laws and regulations applicable to its activity.

The present Code, due to its prescriptive nature, contains the set of principles that the Company undertakes to respect and abide by, in order to serve as a priority corporate deontology tool. The aim is to formalize the principles and standards of behaviour and create the conditions for the correct application of specific policies and procedures. The Recipients are therefore called upon to respect the values and principles of the Code of Ethics and are required to safeguard and maintain, through their conduct, the respectability and image of the Company.

### 2. Parties to which the provisions of the Code apply

This Code applies to:

- Members of the Board and/or members of other administrative bodies;
- Statutory Auditors and/or other supervisory control bodies;
- All employees of the Company;
- All internal collaborators of the Company holding forms of contract other than staff contracts ;
- Suppliers and/or third parties who receive assignments from the Company or who have a lasting relationship with the Company through formal requests to comply with its principles and criteria of conduct.

### 3. Scope and consequences of violations of the Code

The principles and contents of the Code spell out the normative requirements related to the diligence, loyalty and impartiality that constitute the proper work performance and behaviour to be observed by all Recipients. Code Recipients are therefore required to observe and comply with the provisions.

Violation of the principles and contents contained in the Code is a disciplinary contractual breach with any consequence provided by the law or the contract applicable to the parties.

This Code of Ethics applies to all countries in which the Company operates.

### 4. Business Values

To establish and maintain good rapport and consideration between the Company and their respective stakeholders (current and potential suppliers and customers, lenders and creditors, public institutions and civil society), the ethical principles laid down in this Code must be fully respected.

In particular the Company must recognize and respect the following principles:

#### 4.1. Legality

The Company respects and ensures respect within the Company the laws in force and the ethical principles commonly accepted in accordance with international standards of business conduct. In pursuit of this

## CODE OF ETHICS

purpose, all Recipients must be conscious of the ethical implications of their actions and should not pursue personal or corporate advantage to the detriment of the applicable laws and of the principles of this Code.

### 4.2. Transparency, fairness and loyalty

The Company rejects the use of unlawful or incorrect behaviour to achieve its economic or other goals. In addition, the Company adopts reasonable organizational tools aimed at preventing violation of laws and of the principles of transparency, fairness and loyalty by the Recipients, monitoring their compliance and objective implementation.

### 4.3. Good faith

All Recipients must be guided in their work by the principle of good faith, performing their duties in a prompt, fair and loyal way, acting with integrity, and with respect for the regulations and the people involved.

### 4.4. Non-discrimination and equal opportunities

The Company operates by avoiding discriminatory behaviour and therefore does not discriminate in any way, inclusive of discrimination on gender, sexual orientation, ethnicity, language, religion, political opinions, personal conditions and social conditions. The assessment of the Recipient's work in the service of the Company is to be based only on their professional skill, merit and compliance with the Code.

### 4.5. Diligence

The Recipients, within the limits of their duties and competences, are required to carry out the duties entrusted to them with the utmost commitment and professionalism.

### 4.6. Respect and protection of the environment

The Company is committed to carrying out its activities in full respect of the environment as a collective good.

### 4.7. Health and Safety at Work

The Company considers occupational safety, health and the physical and psychological wellbeing of the Recipients to be of primary importance and acts in accordance with the norms in this area.

The Company requests all its Recipients to promptly comply with the preventative and safety measures adopted.

The following are the basic principles and criteria which the Company recognizes and promotes in order to properly maintain the health and safety of employees, taking into consideration the best practices for risk management and prevention to safeguard the health and safety of workers:

1. Avoid, or in any case limit, risks to health and safety;
2. Assess and manage risks, including potential risks, to health and safety;
3. Programme actions for risk prevention;
4. Provide adequate training to workers;
5. Promote the active participation of Recipients in Company strategies related to health and safety at work; All above actions to be in full compliance with applicable regulations risk prevention as well as related information and training activities.

### 4.8. Quality of services offered and customer satisfaction

The results of the Company's activities and the respect for the established values are reflected in the services provided, always guaranteeing quality and timeliness.

### 4.9. Reputation

The Company bases its activity on behaviour which is correct, coherent and consistent with the mutual satisfaction of its relations with third parties. The Company is committed to disseminate among its employees a spirit aimed at improving the image of the Company.

The assignments and tasks entrusted are carried out with professional diligence and responsibility.

Respect for these principles represents an essential element of work performance, translating into responsible behaviour with regard to the Company.

### 4.10. Privacy protection

## CODE OF ETHICS

Any information, data or document viewed in the course of the performance of activities by each individual Recipient is confidential and must not be disclosed in any way other than in accordance with the Company's procedures and applicable rules.

The Company undertakes to ensure the correct application and correct handling of all information used in the conduct of its business activities. The Company also undertakes to maintain an adequate level of security in the selection and use of its Information Technology systems designed to process personal data and confidential information.

### 4.11. Conflict of interest

All decisions made on behalf of the Company must be in the best interests of the Company and in accordance with the spirit and principles set out in this Code.

All Employees and Collaborators must avoid any possible conflict of interest, whether personal or family-related, that could influence the independence of judgment in deciding what is the Company's best interest and the most appropriate way to pursue it: transparency, trust and integrity are values that must be respected in any circumstances.

To this end, the Administrators must comply with the obligations set forth in article 2391, first paragraph, of the Italian Civil Code.

For the above mentioned reasons, the Administrator, who in a given transaction has, on his own behalf or on behalf of third parties, an interest in conflict with the Interest of the Company, must inform the other Directors and the Board of Statutory Auditors, and must abstain from taking part in the decisions regarding the transaction in question.

### 4.12. Independence of judgement and confidentiality

The Company, in relation to its governance and organizational structure and as a result of the service provided to customers operating throughout the glass supply chain, considers independence of judgement and confidentiality to be essential values that each Recipient of this Code must respect and adopt.

### 4.13. Intellectual Property

The Company acknowledges the importance of Intellectual Property as an essential resource of the Company itself and, as such, puts in place all the appropriate measures to protect it.

Any Recipient, even after the termination of their employment relationship, is required not to disclose or make available to third parties any information regarding the technical, technological and commercial knowledge of the Company, as well as any other non-public information concerning the Company (unless the information has already reached the public domain without the intervention of the Recipient). The only exception to this rule is where such disclosure is required by law or by Public Authorities.

The Company also undertakes not to develop projects and/or products that may be in violation of third party Intellectual Property rights.

### 4.14 Centrality and Human Resources Enhancement

Human resources are considered indispensable and crucial for the success of the Company's activities.

The Company promotes training, development of professionalism and the sharing and transferring of skills. It advocates recognition of merit and, at the same time, requires all Recipients to act with commitment, fairness and transparency in all relationships.

### 4.15 Environment and waste

Recipients must comply with the requirements of the law on environmental protection, particular attention must then be paid to the disposal of waste.

### 4.16 Prevention of corruption

Company personnel shall comply with the measures necessary to prevent offences. In particular, personnel respect the prescriptions of the Plan for the prevention of corruption and for transparency, and cooperate with the person responsible for transparency and prevention of corruption also

## CODE OF ETHICS

reporting to him/her and to the Supervisory Body (OdV) any illegal situations of which he/she has become aware.

### 4.17 Transparency and traceability

The staff shall ensure the fulfilment of the transparency obligations in accordance with the applicable legal provisions.

The traceability of the decision-making processes must be guaranteed by means of appropriate documentary support.

## 5. **Behavioural principles**

The Company believes that the fundamental values that connect its employees are: professional commitment, respect for persons, integrity, loyalty and solidarity.

### 5.1. Professional commitment

Professional commitment is characterized by the permanent implementation at the best possible level of skills and know-how acquired and necessarily involves its regular updating. It requires the willingness to carry out the tasks assigned and the openness to acquire the required knowledge.

### 5.2. Respect for people

Respect for people is an absolute condition for the individual and professional development of each person. It translates into listening to others, providing them with all the information and explanations they could need and through a constant and constructive dialogue.

### 5.3. Integrity

Integrity requires absolute honesty in the exercise of the professional activity. It does not allow any compromise between personal interests and the purposes to be achieved in the course of the professional activity within the Company and in relations with third parties.

### 5.4 Loyalty

Loyalty is a need for behavioral integrity in relations with superiors, colleagues, collaborators and third parties. In particular, it prohibits the pursuit of personal ends that are in contradiction with the objectives set by the Company. It implies compliance with the Company's internal rules and regulations.

### 5.5. Solidarity

Solidarity is based on the spirit of responsibility of each individual, in his or her own professional context, which translates into leaving aside individualistic attitudes and encouraging the enhancement of teamwork and mutual contributions. It rejects management or operating methods that favour personal satisfaction over the interests of the Company.

## **Rules of conduct between the parties**

### 6.1. Rules of conduct with staff

The Company deals with its human resources with the utmost correctness, as well as respecting the labour law and applicable national collective employment agreements. The Company is committed to investing in the personal growth, training and satisfaction of its staff in order to increase their skills and to show recognition for their knowledge, as well as to maintain a healthy work environment inspired by civil coexistence and mutual respect. It is also committed to promoting a direct and indirect employment development policy coherent with the strategies for business growth and development.

The Company recognizes and respects the right of employees to join trade unions and/or political organizations, in compliance with current regulations.

### 6.2. Rules of conduct with customers

The Company considers customer satisfaction the primary goal, achieved through the provision of a high level of quality at competitive terms.

## CODE OF ETHICS

Recipients must not, under any circumstances (either in their own name or on behalf of the Company), promise or offer payments or goods or other benefits to public or private entities to promote or favour the interests of the Company or their personal interests.

The Company provides accurate and comprehensive information about the services it offers, so that the customer can make informed decisions. The Company is committed to maintaining full confidentiality with regard to confidential information about its customers, both in terms of strategic information and personal data, and to use the above information strictly for professional reasons, requesting explicit authorization when necessary.

### 6.3. Rules of conduct with third parties

All Recipients (both in their own name and on behalf of the Company) are prohibited from accepting directly or indirectly from third parties, gifts and/or benefits (money, objects, services, favours or other benefits) having a not insignificant value, which are intended to cause the Recipient to behave in contravention of statutory requirements or regulations of the Company or with the principles of this Code. In private relationships, including non-working relationships with public officials in the performance of their duties, employees shall not exploit or mention their position in the Company to obtain any type of personal benefit and shall not engage in any other conduct that may damage the Company's image.

### 6.4. Rules of conduct with suppliers

Suppliers' selection process is based on principles of fairness, price, quality and transparency based on an objective evaluation aimed at protecting the Company's interests. The Company also adopts specific procedures and objective criteria in assigning orders and managing supplier relationships in order to ensure transparency and fairness in the pursuit of its economic objectives. The Company undertakes to maintain complete confidentiality of information concerning its suppliers and to use such information only for strictly professional reasons, and in any case following provision of written permission where necessary. Remuneration will be exclusively commensurate with the performance/supply indicated in the contract and payments cannot be made in ways which differ from the contractual provisions.

### 6.5. Rules of conduct with public institutions

The Company is guided by and aligns its conduct with the principles of legality, fairness and transparency in order not to induce the Public Administration to violate these principles. In particular, no behaviour must be carried out for any reason to unlawfully influence their decisions to give the Company an undue or unlawful advantage. Contacts with the Public Administration are managed, in accordance with the specific Company procedures, by those specifically and formally appointed by the Company. It is forbidden to allocate contributions, subsidies or grants obtained by the State or other public bodies or the European Communities for purposes other than those for which they may have been granted. The Company condemns any behavior by anyone who is involved in promising or offering directly or indirectly gifts and/or benefits (money, objects, services, favours or other benefits) to public officials and/or those involved in providing public services, or their relatives, from which an undue or unlawful interest or advantage can be obtained. Such behaviour is considered to be corruption regardless of who is involved.

### 6.6. Rules of conduct with trade unions

Relations with trade unions are restricted to the corporate functions authorized to establish and manage such relationships on the basis of assigned business tasks. Any relationship with these subjects is also characterized by high standards of transparency and fairness.

### 6.7. Standards of conduct with Internal and External Auditors and other control bodies

The Company ensures that all relationships with the Internal and External auditors and with other supervisory bodies in general, are based on the utmost professionalism, diligence, transparency, collaboration and willingness to cooperate. The Company also operates in compliance with the institutional role of these entities and ensures full and timely implementation of the requirements and formalities required by releasing the necessary information in a clear, punctual and comprehensive way. In the context of relationships with such entities, the Company ensures that any situation of conflict of interest is avoided.



## CODE OF ETHICS

### 6.8. Rules of conduct with the Competition

The Company favours maximum competitiveness on the market and therefore its commercial policy is developed in full compliance with all applicable laws and regulations in the field of competition.

### 6.9 Interpersonal relations in the working environment

Under no circumstances will the Company tolerate intimidation, harassment or bullying in working relationships.

Any form of harassment related to personal differences such as race, ethnicity, religion, sexual orientation, civil status, political and cultural opinions. Recipients should contribute personally to promoting and maintaining an atmosphere of mutual respect in the work environment, where particular attention is paid to respect for others' sensibilities.

## 7. **Communication and management of information**

### 7.1. Corporate communications

The Company undertakes to provide all communications to the supervisory authorities in a clear, timely, correct and complete manner. Only the specially-mandated company functions can put in place the above-mentioned communications activities.

### 7.2. Transparency of financial reporting

In the preparation of accounting documents and data, reports and other social communications required by law, directed to shareholders and the public, as well as any registration required by administration, the Recipients shall abide by the most stringent principles of transparency, fairness and truthfulness.

In particular, all Recipients asked to prepare the aforementioned documents are required to verify, for the parties concerned, the correctness of the data and information that will then be used in the preparation of their respective documents.

## 8. **Model of implementation of the Code of Ethics**

### 8.1. Adoption and updating of the Code of Ethics and transmission of reports of violation

The Code of Ethics is approved by the Administrative Body. An external "Supervisory Body", to which any notifications of violation of said Code can be submitted, has been identified.

### 8.2. Disciplinary system

Violation of the provisions of this Code of Ethics by the Recipients constitutes a breach of the primary obligations of the employment relationship, with application of the legal consequences and/or as provided for in the employment contracts. Violation of the Code also includes any form of retaliation against anyone who has reported any possible violations of the Code or requests for clarification on its application.

### 8.3. Knowledge and application

The Accounting and Human Resources department is in charge of disseminating the Code of Ethics and its principles by inserting it on the Company Intranet and on the Institutional Website, as well as by delivering a paper copy of said Code to employees at the time of their recruitment.

Recipients shall document, by means of a signed copy or approval of contractual agreements, the receipt as well as the commitment to observe and ensure observance of the principles of the Code.

Each Recipient is obliged to:

- abstain from conduct contrary to such rules, principles and regulations;
  - promptly report possible cases or requests for violation of the Code of Ethics to the Supervisory Board.
- Recipients may contact their superiors, Company contacts and/or the Supervisory Body for clarifications concerning the application of this Code of Ethics.

### 8.4. Review of the Code of Ethics

The Company's Board of Directors, through the Supervisory Body, ensures the periodic revision and updating of the Code of Ethics in order to adapt it to regulatory and environmental changes, to evolving



## CODE OF ETHICS

civil sensitivities, as well as to respond to recommendations from the Recipients and experience gained in its application.

Any amendments and/or additions to the present Code must be carried out following exactly the same procedures adopted for its initial approval.