

CODE OF ETHICS

Revision	Date	Purpose	Drafting and Verification	Approval
00	14/11/2022	First Issue	RGQ	DIR

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1. Introduction

RDM PACK S.r.l. was established in April 2021 through a management buy-out of the Italian company NNZ S.r.l., which was part of the Dutch group NNZ BV (www.nnz.com), carried out by the management team together with the Nuova Erreplast Group of Naples.

RDM PACK S.r.l. deals with the marketing and development of traditional packaging products for the industrial and agri-food sectors, including but not limited to:

- big-bags and woven polypropylene sack;
- trays and containers made of PET, PP, wood pulp, wood, paper, cardboard, etc.;
- cotton and jute bags;
- tubular nets, woven/extruded net sacks made of plastic, bioplastic, cotton and cellulose materials;
- compostable packaging solutions (labels, pouches, tubular nets, mesh bags, etc.).

Company Name	RDM PACK S.r.l.
Registered Office	Via Pasubio, 12 - 20026 - Novate Milanese (MI)
Operating Office	Via Pasubio, 12 - 20026 - Novate Milanese (MI)
VAT Number	11759670158
Tax Code	11759670158
REA Number	MI-1491328
Year of Incorporation:	12/02/1996
Telephone	02.45700098
Fax	02.39288335
PEC	rdm.pack@legalmail.it
Email	info@rdmpack.it
Website	www.rdmpack.it

2. What is the Code of Ethics

The Code of Ethics (hereinafter referred to as “the Code”), approved by the Board of Directors/Sole Administrator of RDM PACK S.r.l., contains the principles of conduct that the Company, its personnel and anyone carrying out activities in the name and/or on behalf of RDM PACK S.r.l. must observe both internally and towards third parties, as well as the related commitments. Compliance with the Code is a necessary condition for establishing and maintaining employment, commercial or contractual relationships of any kind with RDM PACK S.r.l. The purpose of the Code is to ensure that the Recipients maintain ethical behaviour in every circumstance involving RDM PACK S.r.l., committing in particular to:

- act with fairness and courtesy in dealings with all stakeholders;
- respect the interests of each stakeholder (e.g., customers, consumers, institutions, public authorities, the external community, etc.);
- perform one’s role with professionalism and moral integrity.

The principles contained in the Code form the basis of RDM PACK S.r.l. policies, practices, and operational procedures. The Code also defines the methods for verifying compliance and the sanctions applicable in case of violations.

3. To whom the Code of Ethics is addressed: the Recipients

The provisions of the Code apply, without exception, to all directors and company personnel, including employees, consultants, and evaluators (hereinafter referred to as “Recipients”) who have contractual relationships with RDM PACK S.r.l., in all countries in which the company operates.

Recipients are therefore required to read, understand, and adhere to the contents of the Code, adopting behaviour consistent with its principles. They must also report any violations of the Code to the appropriate bodies, as better detailed in the final section of the document. Compliance with the Code must be considered an essential part of the contractual obligations of the Recipients.

The management of RDM PACK S.r.l. is responsible for communicating, explaining, and ensuring the understanding of this Code by all company personnel. The management ensures that the commitments expressed in the Code are implemented across all Areas and Functions.

Below are the Company’s Mission and Values.

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4. Mission

The Company's Mission is to assist profit, non-profit, and public organizations in assessing and managing complexity, ensuring training and assessment based on international methodological standards of compliance and governance on a global scale, so as to guide their skills to remain sustainable and competitive in the long term.

5. Values

5.1. Integrity, Responsibility, Impartiality

To act ethically, transparently, responsibly, and with intellectual honesty, with a strong sense of duty. To make decisions with balanced rigour and without undue influence.

5.2. Customer Focus, Professionalism, Assertiveness

To pay constant attention to customer needs with a proactive and professional attitude in order to provide excellent service, meeting their explicit, implicit, and latent needs within current regulatory frameworks. To maintain assertive behaviour towards colleagues and customers of the organization.

5.3. Belonging, Team Spirit, Care for Resources

To be aware of belonging to a cohesive organization that shares the same objectives and values, with a strong capacity for teamwork. To care for direct and indirect human resources through training, continuous motivation, meritocracy, careful selection, and responsible management of financial and economic resources.

5.4. Reliability, Empathy, Adaptability

To act reliably, credibly, and consistently to maintain the organization's reputation, honouring commitments and deadlines. To think empathetically and adapt to needs and changes in order to ensure that tomorrow will be better than today.

6. Conflict of Interest

Recipients must avoid any potential conflict of interest, particularly concerning personal and/or family interests that could affect their independence of judgment or otherwise conflict with the interests of RDM PACK S.r.l., in order to maintain a high reputational standard.

Recipients must immediately report to their direct superior (for employees of RDM PACK S.r.l.) and/or to top management any situation that constitutes or may generate a conflict of interest. In particular, Recipients must disclose any permanent or temporary employment, financial, commercial, professional, or family relationship with entities outside RDM PACK S.r.l. that could compromise their impartiality or the correctness of their activities.

If a conflict of interest, even potential, concerns the company's top management, they must promptly report it to the Board of Directors/Sole Administrator for the necessary decisions. Likewise, directors must report any such conflict to the Board and abstain from participating in related decisions.

7. Gifts, Benefits, and Anti-Corruption

Under no circumstances does RDM PACK S.r.l. permit behaviours whereby Recipients, directly or through intermediaries, offer or accept money, gifts, promises, or any advantage in order to perform, omit, or delay acts within their functions, or to obtain undue benefits for themselves or for RDM PACK S.r.l.

Only the occasional acceptance of small gifts, given out of simple courtesy and not as a form of compensation, is permitted.

Corruption distorts competition and causes harm to individuals and society. It may also result in criminal and/or civil proceedings against both Recipients and the Company. RDM PACK S.r.l. strictly prohibits all forms of active and passive corruption, whether in the public or private sector, and any such conduct will be subject to the most severe disciplinary action.

Audit activities must be carried out with the utmost rigour and integrity, ensuring impartiality and independence.

8. Antitrust Regulations

Recipients regard compliance with antitrust regulations as a fundamental value and conduct their activities to prevent anti-competitive behaviours. RDM PACK S.r.l. aligns its business policies with national and international legislation protecting free competition. Recipients are prohibited from engaging in conduct that constitutes an antitrust offence.

9. Protection of Company Assets

Recipients must act diligently to protect company assets, using the tools entrusted to them correctly and responsibly, avoiding improper use and refraining from using them for unlawful purposes.

10. Protection of Information and Intellectual Property

Recipients must treat company information (commercial, financial, technological, etc.) and intellectual property (trademarks, software, etc.) as assets of primary importance to RDM PACK S.r.l. Disclosure of such information to unauthorized persons is

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strictly prohibited. Likewise, information received from third parties must be handled with full respect for confidentiality and privacy, in accordance with applicable laws and internal data protection policies.

11. Relations with Personnel

11.1. Compliance with Employment Contracts and Labour Regulations

RDM PACK S.r.l. considers human resources a fundamental asset for its business and undertakes all appropriate actions to enhance the various opportunities made available by the applicable National Collective Labour Agreement (CCNL), in line with the strategic decisions adopted by the Company.

A written contract is prepared for each consultant and evaluator, drafted in accordance with current laws.

11.2. Selection, Management, and Development of Human Resources

RDM PACK S.r.l. avoids any form of discrimination against its employees and collaborators and adopts objective and gender-neutral criteria in the selection, management, and development of human resources.

11.3. Protection of Moral and Physical Integrity

RDM PACK S.r.l. considers the moral and physical integrity of all personnel a primary value and ensures working conditions that respect individual dignity, in safe and healthy environments. In particular, the Company does not tolerate abuse of power, violent behaviour, discriminatory acts, or any conduct that harms personal dignity or individual rights.

RDM PACK S.r.l. is committed to promoting and consolidating a culture of safety by raising awareness of risks, encouraging responsible behaviour among all employees, adopting appropriate working methods, ensuring adequate training, and making every reasonable effort to prevent events that could endanger the moral or physical integrity of the Recipients.

11.4. Protection of Privacy

RDM PACK S.r.l. operates in full compliance with the provisions governing the processing of personal data. The Company bases its management policy on the utmost protection of the Recipients' privacy, adopting appropriate procedures for handling and storing information required to effectively carry out its activities. Investigations into opinions, personal preferences, or, in general, the private lives of company personnel are not permitted.

12. Relations with Customers and Suppliers

Relations with RDM PACK S.r.l. customers are based on fairness, good faith, and compliance with current regulations, including all accreditation requirements. The selection of suppliers is carried out according to objective criteria such as price and quality of service, and in accordance with the principle of equal treatment.

13. Relations with Consumers and the Media

RDM PACK S.r.l. is committed to providing consumers with timely, qualified, and competent responses to their needs, offering accurate and truthful information on the validity of issued certifications. External communication by RDM PACK S.r.l. is guided by respect for the right to information. Under no circumstances is it permitted to disclose false or misleading news or comments.

14. Relations with the Community and Institutions

14.1. Sustainability

In carrying out its activities, RDM PACK S.r.l. promotes sustainable development in order to maintain a constant balance among social, environmental, and governance dimensions, aiming to meet the current needs of all stakeholders without compromising those of future generations.

14.2. Financial Relations with Political Parties, Trade Unions, and Associations

RDM PACK S.r.l. does not finance political parties, their representatives, or candidates, nor does it sponsor events of political propaganda. The Company refrains from any direct or indirect pressure on political figures. RDM PACK S.r.l. does not provide contributions to organizations such as trade unions or associations representing collective interests. Cooperation, including financial, is possible only when the following conditions are cumulatively met:

- the purpose is consistent with the mission of RDM PACK S.r.l.;
- the allocation of resources is clear and documentable;
- express authorization is given by the Board of Directors/Sole Administrator.

RDM PACK S.r.l. may consider requests for contributions only from non-profit entities and associations, research institutes, and public or private universities, provided they are established under regular statutes and constitutive acts, and such contributions must be authorized by the Board of Directors/Sole Administrator.

14.3. Relations with Public Institutions

Relations with national and supranational Public Institutions are based on the highest institutional respect and are conducted according to principles of fairness and transparency.

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15. Compliance with the Code of Ethics

Compliance with the provisions of this Code must be regarded as an essential part of the contractual obligations assumed by the Recipients towards the Company. The management of the various Functions of RDM PACK S.r.l. is responsible for ensuring that their behavioural expectations towards employees are understood and implemented. Management must therefore ensure that the commitments expressed in the Code are applied within their respective functions.

16. Reporting of Violations

To ensure the effective application of the Code, RDM PACK S.r.l. requires Recipients who become aware of any breaches of this Code to report them according to the following procedures.

Employees, consultants, and evaluators shall promptly report any violations or well-founded suspicions of violations to their direct supervisor or company functional contact. Alternatively, they may report directly to the Board of Directors/Sole Administrator of the Company.

For external parties, reports must be sent directly to the Supervisory Body (OdV). Reports to the OdV must be made in writing to one of the following addresses:

- RDM PACK S.r.l., Via Pasubio, 12 - 20026 - Novate Milanese (MI)
- info@rdmpack.it - qualita@rdmpack.it

The Company adopts suitable measures to ensure the confidentiality of the whistleblower's identity at all times.

Reporting violations shall not entail any adverse consequence in the workplace or contractual context; on the contrary, it is conduct encouraged by the Company. Any form of retaliation against those who, in good faith, report possible violations of the Code is itself a violation of the Code. Likewise, false accusations made with the awareness that no violation has occurred are also considered breaches of the Code.

17. Sanctions

Violation of the principles set out in the Code of Ethics and company procedures undermines the relationship of trust between RDM PACK S.r.l. and the Recipient responsible for such violation. Once established, violations will be promptly and appropriately sanctioned through disciplinary measures proportional to the severity of the misconduct, regardless of any criminal, civil, or administrative implications.

Disciplinary measures for violations of this Code are adopted by RDM PACK S.r.l. in accordance with applicable laws and relevant national labour contracts. Such measures may include dismissal of those responsible for the unlawful conduct.

18. Dissemination of the Code of Ethics

This Code is approved by the Board of Directors/Sole Administrator and communicated to all Recipients. The Code of Ethics is available on the website www.rdmpack.it. It is distributed to all personnel, including by email. A copy may be requested from the Quality Assurance function.

Updates and revisions of the Code are approved by the Board of Directors/Sole Administrator of RDM PACK S.r.l..