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CODE OF ETHICS

Approved by the Board of Directors of E80 Group S.p.A



E80 Group S.p.A.

Subject to direction and coordination by Eagle Srl
Registered office in Via G. Marconi, 21 - 42030 Viano (RE), Italy
Ph. (+39) 0522 762011 - Fax (+39) 0522 988481 - E-mail: info@e80group.com - PEC: e80group@pec.it
www.e80group.com - Fully Paid-up Share Capital € 1.061.818 - Company Registration Number: RE - 227884
ATECO Code 28.99.20 - VAT Number IT01835150358



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1. PREMISE

E80 Group aims at being the best world's supplier of solutions that optimize the value chain for the consumer products industry; to achieve this goal, E80 Group wants to be a partner of its customers in improving productivity and quality by using key elements such as: safety, innovation, and integration.

The values of E80 group are:

- **ORIENTATION TO THE CUSTOMER:** We are guided by the respect and the satisfaction of our customers.
- **TEAM SPIRIT:** We are aware that we can only be successful as a team and if one of us works in a productive and rigorous way.
- **INTEGRITY:** We are always looking to doing the right thing, and we communicate with our colleagues and our customers in an open, honest, respectful way.
- **ETHICS:** We work in a professional way, by observing the social and institutional environment of the countries where we work.
- **RESPONSIBILITY:** We take our responsibilities, and we are determined to do what it is necessary to achieve the objectives we have set ourselves.
- **ORIENTATION TO PERSONS:** Our aim is to make the persons who work with us grow, thus contributing to the Company's success.
- **ORIENTATION TO IMPROVEMENT:** We have the humility to admit our mistakes, oriented in everything we do to a continuous improvement towards excellence.

Our will to promote a deep sharing of our ethical vision with all our employees is the source of this Code of Ethics.

2. PRESENTATION OF THE CODE OF ETHICS

The Code of Ethics expresses the principles and core values of E80 Group. It allows us to organically share the strong corporate culture and provides a guide to activities and behaviours.

The present Code is therefore:



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- the Company's Ethics founding document, which all recipients sign when they begin their collaboration with our Company.
- a tool of fundamental importance for the growth of an ethical and sustainable business.

The Code of Ethics is addressed to all the people who work in the name and on behalf of E80 Group: administrators, senior staff, white-collar and working-class employees, as well as to all external partners such as - by way of example only - consultants, contractors, suppliers, agents, and representatives (hereinafter called: " Recipients").

Compliance with the principles and provisions contained in the Code are for all recipients an integral part of their duties, as well as the compliance with the legal order rules in which they operate (national, supranational, or foreign) and the requirements contained in the Italian National Labour Contract (CCNL).

Those who have prominent roles, such as managers or executives, should be an example for others, thus demonstrating that the respect for the Code of Ethics is a fundamental part of our daily work and that business results are never separated from the observance of the principles contained in it. The Company, through its competent departments, is committed to informing all those with whom it currently has - and will have - new business relationships, on the implementation of the Code. The Company will demand - even through the inclusion of specific clauses in contracts - the adherence to the principles as a requirement for continuing or establishing a business collaboration with us. We are all called upon to ensure compliance with the Code of Ethics.

The rules contained in this document are designed to ensure the compliance with all relevant legal provisions and the adoption of a behaviour that is ethically correct and fair by all recipients and all those who - notwithstanding their title and role - work for the Company, even occasionally. The Code of Ethics is part of the organizational, management and control model provided by the Legislative Decree 231/2001.

This Decree introduced in our legal system a new form of penal liability referring to the Company, if any crimes are committed in its interest or to its advantage.

The Decree provides a particularly rigorous system of fines against convicted companies, but also provides that the Code of Ethics, if placed within an effective organizational, management and control model, can represent a protection force to the Company's benefit.



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3. INTERNAL RELATIONSHIPS

3.1 OUR PEOPLE

Our aim is to make the persons who work with us grow, thus contributing to the Company's success.

We are committed to enhancing the competences of each one through training, updating and professional development tools, so that everyone can express one's potential to his/her benefit and the Company's success.

Coherently with this approach, we give the utmost importance to the recognition of merit and professional skills in our relations with our collaborators.

3.2 Equal opportunities and person's rights

We are inspired by the principles of freedom, dignity, and respect for the individual in creating and maintaining a positive work environment, which guarantees to all our collaborators the opportunity to express their best in their work activities and achieve their professional aspirations.

In addition to respecting fundamental personal rights, we ensure respect for the principles of equal opportunities, by creating a work environment free from racial, cultural, ideological, sexual, demographic, physical, religious discrimination, or discrimination of any other nature. We condemn, therefore, any form of discrimination and harassment, and we are committed to:

- do not use or support the use of child labour.
- do not use or support the use of forced and obliged labour
- do not engage in or support any kind of discrimination
- do not use or support disciplinary practices, such as corporal punishment, mental or physical coercion, verbal abuse.

We respect the laws, and both the national and local agreements applicable to working hours and public holidays.



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- we remunerate employees according to the National and Integrated Labour Contract, where present

3.3 Health and safety in the workplace

The working conditions and the protection of our people's health and safety and of our co-workers and the communities in which we operate are a priority for us.

Prevent and reduce the risks to the health and safety of workers, in particular:

- prevent risks at source, i.e., during the planning phase, during the choice of materials, and the identification of methods and technologies,
- ensure that work environments are suitable, safe, and ergonomic to perform the activities,
- protect the health of workers through continuous health monitoring and its evaluation.
- reduce injuries and professional illnesses that affect workers.

Enable effective accident prevention measures and reduce harmful consequences for workers, the environment and the population's health, by adopting the best and economically sustainable technical instruments.

We promote among all our people a culture of safety through appropriate training. We are all responsible for the compliance with the rules and procedures established for our personal and our colleagues' protection. We are bound to the use of personal protective equipment and to promptly report any anomalies.

3.4 Union representatives

We recognize the freely elected union representatives in compliance with local legislation and practices in force.



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In relations with our collaborators, we comply with the regulations of the collective labour agreements and act in compliance with the right of workers to form, participate in and organize trade unions according to their own will and to collectively bargain the contract with the Company.

3.5 Corporate behaviour

We take our responsibilities, and we are determined to do what it is necessary to achieve the objectives we have set ourselves.

We are aware that we can only be successful as a team and if one of us works in a productive and rigorous way.

Everyone must conduct its business responsibly, with spirit of initiative and the professionalism required by the nature of the performed functions, with the maximum effort necessary to achieve the set objectives, in accordance with the principles of honesty and integrity. We are also committed to maintaining a decent behaviour in the workplace.

3.6 Use of the corporate assets and information systems

All the business assets that are made available are essential tools for achieving the Company's results. It is not permitted - under any circumstances - to use the company assets and information resources for purposes contrary to law, public order, or morality.

We are all responsible for the custody and care of the assets and resources we have been entrusted with. Specifically, regarding information systems, it is important to monitor their functionality and their correct use, to protect the information they contain, to keep passwords confidential and the identification codes reserved, and to only use software programs authorized by the Company.



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3.7 Presents and gifts received from third parties

We work in a professional way, by observing the social and institutional environment of the countries where we work.

The exchange of benefits or utilities whose value exceeds the limits of reasonableness or that are not consistent with normal work relations and business courtesies - might influence our choices. It is, therefore, forbidden to accept from third parties - or solicit or request for oneself or other people gifts, presents, benefits or other utilities - that could be interpreted as a means to obtain favourable treatment or undue advantages for any activity referable to the Company, such as to create the impression of illegality or immorality.

Anyone who receives gifts or any other benefit, not directly attributable to normal courtesy, is obliged to reject them and to immediately inform his/her direct supervisor or the indicated structures.

3.8 CONFIDENTIALITY

The reserved and confidential documents and information are an invaluable asset and, therefore, their disclosure could harm E80 Group. It is, therefore, up to all to guard and protect with diligence and in an appropriate way the information we know for working reasons, even after our employment termination.

The concept of confidential information includes all data, projects, software, knowledge, deeds, documents, reports, notes, studies, drawings, photographs, and any other material relevant to the organization, to third parties and to the Company's assets, the commercial and financial operations, the research, and development activities, as well as judicial and administrative proceedings involving the Company.

Their communication, even to third parties, must always be authorized and is only allowed if necessary to carry out the tasks we have been assigned.



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4. EXTERNAL RELATIONSHIPS

We are always looking to doing the right thing, and we communicate with our colleagues and all the people getting in contact with the Company in an open, honest, respectful way.

Therefore, we condemn:

- corruption practices, illegitimate favours, collusion, requests for personal or career advantages or advantages to the Company.
- offers for money payments, material benefits and other advantages of any kind to representatives of governments and administrations, public officers and public servants or private employees, or to their family members, to influence or remunerate the actions of their office, even under unlawful pressures.

Instead, acts of business courtesy are permitted, for example free gifts or forms of hospitality, if of limited value and if they do not compromise the integrity or reputation of either parties, or if they cannot be interpreted as aimed at obtaining undue advantages.

4.1 CUSTOMERS

We are guided by the respect and the satisfaction of our customers.

We have the humility to admit our mistakes, oriented in everything we do to a continuous improvement towards excellence.

We engage with passion in the continuous improvement of the quality and safety level of our machines and systems, to deliver customer-valuable products and services.

We pursue a balanced development company, through the continuous improvement of planning systems, planning, organization, and business processes check, to achieve the business objectives both in strategic and functional terms.



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We promote initiatives to monitor and improve the level of customer satisfaction. Each customer relation must be based on honesty and professional integrity.

4.2 Business partners

Relationships with business partners are strategic for the Company's success and must be guided by principles of fairness, transparency, and mutual satisfaction.

We refuse to entertain business relationships with anyone involved in illegal activities. For this reason, we do verify preventively the reliability and professional respectability.

Each Recipient must promptly report to his/her supervisor any behaviour by other parties that appears contrary to the ethical principles set out in the Code.

4.3 Suppliers

The supplier system plays a fundamental role in improving the Company's overall competitiveness.

We identify, evaluate, and involve suppliers, by establishing a relationship of mutual cooperation, and trust that ensures systematic compliance and continuous improvement of quality, environmental and safety requirements of the purchased products/services, as well as of the required delivery terms. We consider it essential that all our suppliers are committed to the principle of social, economic, and environmental sustainability when carrying out their activities. This is a requirement for continuing or establishing a partnership with E80 Group.

4.4 Competition

We recognize the value of competition and the importance of its protection for the market development and the safeguarding of the customers' interests.



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We comply with the customer's requirements and to legal requirements, or to the requirements related to products, processes, and activities.

We reject, therefore, practices that violate the competition and the free market rules. We consider it essential that the competition with competitors must be fair and focused on quality.

4.5 Institutions, Public Administration, other Authorities and Associations

We have with Public Institutions, Authorities, Boards and Associations relations marked by the highest level of integrity, transparency, cooperation, and non-interference.

We maintain open channels of communication with all institutional interlocutors at an international, national, and local level. We represent the interests of E80 Group through the people appointed to do so in a transparent, firm, and consistent manner, in compliance with the business procedures and values.

Any form of involvement of our people in political activities occurs on a strictly and exclusively personal basis.

We dialogue with and concretely support associations and organizations that are actively engaged in socially valuable activities.

5. CORPORATE SOCIAL RESPONSIBILITY

We manage our activities convinced that the Company should generate benefit not only for itself but for the entire community.

As an industrial entity, we are aware that we must contribute to sustainable development. Therefore, we engage in:

- To fully observe the directives and guidelines concerning the environment and to apply them to industrial activities.



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- To further develop environmental responsibility among the firm staff to achieve an active involvement and participation.
- To evaluate and control the effects of the firm activities on the environment.
- To assess in advance the possible effects on the environment caused by new activities, products, and proceedings.
- To implement the necessary guidelines to reduce any negative environmental impact, in reference to:
 - ✓ Reduction in the production of manufacturing residual materials and waste - if possible -by granting their correct management and disposal.
 - ✓ Optimization of energy consumption and water resources.
 - ✓ Control of acoustic emissions inside and outside the plant.
 - ✓ Implementation of all the necessary measures to prevent possible accidents
- To steady improve the proceedings to protect the environment and to prevent pollution by implementing, if possible, the available technology with minor impact on the environment.
- To periodically single out objectives regarding environmental improvement and to provide the necessary instruments to reach the set goals.
- To guarantee that the goods and service suppliers working for E80 Group observe the firm directives as regards environmental protection.
- To provide the public with information on the environmental impact of its activities.

6. COMPANYIY ACTIVITIES MANAGEMENT

6.1 Accounting records and internal control

For the correct management of the Company activities, it is important that each operation or transaction is correctly and promptly recorded in the internal accounting system.

Everyone, within one's authority, is responsible for the truthful, complete, regular, and accurate maintenance of accounting records, which should be completed in accordance with the law to allow, at any time, the reconstruction of the operations thanks to a complete and properly archived documentation.



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Anyone who becomes aware of any omissions, falsifications or negligence in the accounting records or supporting documents, should immediately report it to his/her supervisor or the charged Internal Inspection Body.

An effective and efficient internal control system, capable of ensuring both the data accuracy and the legality of each transaction is crucial for the Company's good management and success. Its implementation is everybody's responsibility.

6.2 Financial statement and other communications

We are committed to preparing and checking with the utmost diligence, skill, and accuracy the data and information used for the preparation of financial statements and other corporate communications required by the law.

We are all called to ensure our maximum availability, transparency, accuracy, and efficiency in relation to any request made by the Corporate Bodies in the exercise of their official duties.

6.3 Personal data protection

We guarantee the confidentiality and the proper use of our employees' personal information as well as of the data and information gathered as part of our activities.

We are committed to collecting and processing the personal data in full respect with the fundamental rights and freedoms, with the dignity of the concerned parties and the statutory provisions in force. Therefore, we collect and store only the data needed for specific, explicit, and legitimate purposes and we store them for a period no longer than the absolutely necessary time.



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7. IMPLEMENTATION RULES OF THE CODE OF ETHICS

7.1 Commitment to Code of Ethics diffusion

E80 Group is committed to promoting the diffusion of the Code of Ethics to all Recipients and to providing them with the supporting information necessary for its correct interpretation.

7.2 Violation report

All the Recipients are required to ensure the compliance with the Code of Ethics. No one has the authority to require or permit, under any circumstances, the derogations from the principles set out in this Code.

Possible violations must be reported to one's direct supervisor and the corporate Control Bodies. These will initiate the most appropriate investigations and will communicate the results to the competent structures, with a view to adopting possible penalties.

The Company, on its part, is committed to ensuring the utmost confidentiality to anyone who reports the infringement in good faith and will ensure that the latter is not subject to retaliations.

7.3 Sanctions

The respect for and the observance of the provisions in the Code of Ethics are specific commitments for each of us.

The violation of these provisions may be considered a violation of the obligations required in the employment contract and be notified as a disciplinary violation, punishable in accordance with the regulations in force.

The Company commits itself to adopting fair sanctions commensurate with the type of committed violation.

The provisions contained in this Code are also binding for the Company's third parties (e.g., suppliers, representatives etc...).



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The violation of the Code by these persons will be considered as a breach of contract, and as such, it justifies the termination of contracts with E80 Group.

7.4 Modifications to the Code of Ethics

Any future updates, changes or additions will be issued according to established procedures and will be considered as understood because of a special resolution of the Company's Board of Directors. The review activity will also consider the suggestions that the recipients or third parties will report as well as the experience gained under the Code's application.

A handwritten signature in black ink, appearing to be 'L. De Luca', written in a cursive style.



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