

PROFESSIONAL ETHICS

Cromaplast S.p.A. believes that an appropriate Corporate Governance System is necessary for the social and economic development and for the integrity of the company within national and foreign business.

As part of the company policy, ethnic heritage and social responsibility, Cromaplast – by carrying out D.L. June 8th, 2001 nr. 231 – adopted and updated its own Form of Organization, Management and Control.

You can download our Code of Ethics here ([./pdf/general/Cromaplast_Etica_Professionale.pdf](#))

Corporate code of ethics

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1. INTRODUCTION

Cromaplast S.p.A., conforms the conduction of its activities in accordance with the principles and rules of conduct set forth in this Code of Ethics and in the national and international legislation in force, where applicable.

Cromaplast S.p.A., recognizes the importance of ethical and social responsibility and environmental protection in the conduct of the company's business and activities and, to this end, promotes the management of the company aimed at balancing the legitimate interests of its stakeholders and of the collectivity in which it operates. The Code is, therefore based on an ideal of respect for all the interests of the parties involved.

Human resources (employees, collaborators), shareholders, directors, suppliers, customers, public administration, collectivity and, in a broader sense, all the parties involved, directly and/or indirectly, in the company's activities are to be considered interested parties.

It is the management's task to approve the Code of Ethics. The verification of the adequacy of the Code of Ethics regarding the company's sensitivity, its implementation and its application, is the responsibility of the Management itself with the support of the Human Resources and Quality offices.

2. ETHICAL VISION

Cromaplast S.p.A., has set the priority objective of its activity in achieving the highest standards of quality and reliability for products and services provided.

The achievement of this objective is made possible due to the following factors:

- clear strategic vision;
- secure financial balance;
- multi-year experience;
- ongoing innovation research;
- vocation to customer service.

Cromaplast S.p.A., works for the continuous improvement of processes, inspired by several fundamental values:

- operate according to the principles of maximum satisfaction of customers' expectations;
- manage the relationship with the customer with the utmost clarity and transparency, offering all the necessary technical, commercial and financial information, and guaranteeing continuous and prompt assistance;
- inform its internal and external activities with the utmost respect for the individual, in the conviction that ethics in the management of safety at work and in environmental protection must be pursued jointly with the success of the company;
- acknowledge a strategic role to human resources, maintaining relations with them based on mutual respect and refusal of any form of discrimination based on age, sex, sexuality, health status, race, nationality, political opinions or religious beliefs;
- acknowledge an essential role in training, empowerment and involvement at all levels of all personnel, while ensuring respect for physical and moral integrity;
- rationalize company management in all its areas;
- operate in the market in compliance with certain fundamental ethical principles, such as honesty, impartiality and in compliance with all applicable laws and regulations (national and EU laws, internal regulations or codes, administrative provisions, deontological rules), committing not to start or continue any relationship with those who do not intend to align with this principle.

3. THE STRUCTURE OF THE CODE OF ETHICS

This Code of ethics consists of:

- general principles that define the ethical values of reference in the activities of Cromaplast S.p.A.;
- criteria of conduct that specifically provide the guidelines and standards to which Cromaplast S.p.A., and its collaborators must abide;
- implementation methods that describe the control system aimed at complying with the Code of Ethics and improving it.

4. RECIPIENTS AND FIELD OF APPLICATION OF THE CODE

The recipients of the Code of Ethics are all the shareholders, directors, employees and collaborators of Cromaplast S.p.A., as well as those who directly or indirectly, permanently or temporarily establish relations with Cromaplast S.p.A., itself.

Regarding this, Cromaplast S.p.A., promotes the widest dissemination of the Code to all parties involved, the correct interpretation of its contents, and provides the most appropriate tools to facilitate its application.

Cromaplast S.p.A., also implements the necessary measures to carry out verification and monitoring activities of the application of the Code itself.

5. REFERENCE PRINCIPLES

5.1 Compliance with the law

Compliance with laws, transparency and correct management, trust and cooperation with the stakeholders are the ethical principles to which Cromaplast S.p.A., is inspired and from which it derives its models of conduct, to compete effectively and loyally on the market, improve the satisfaction of its customers and develop the skills and professional growth of its human resources.

For this purpose, Cromaplast S.p.A., demands from its shareholders, directors, employees, collaborators, agents, commercial partners, supplier, contractors, and from anyone who carries out representative functions, even de facto, compliance with legislation and all applicable laws and the principles and procedures predetermined for this purpose, as well as ethically correct conduct, such as to no jeopardize its moral and professional reliability.

The main reference standards for Cromaplast S.p.A., are:

- Legislative Decree 81/2008 and subsequent amendments (Safety and work)
- Legislative Decree 152/2005 and subsequent amendments (consolidated Law on Environment)
- Administrative rules regarding managing the personnel office
- Rules regarding the general fulfilment in terms of work
- National accounting principles
- Good corporate management principles
- Current tax legislation
- Applicable national collective labour agreements
- Internal regulations

5.2 Honesty

Honesty is the fundamental principle for all the activities of Cromaplast S.p.A., its initiatives, its reports, its communications, and is an essential element of the management and operation of its human resources.

Relations with stakeholders are based on criteria and correct behaviours, collaboration, loyalty and mutual respect. For this reason, any form of benefit or gift, received or offered, that can be understood as an instrument aimed at influencing the independence of judgment and conduct of the parties involved is refused.

5.3 Transparency and completeness of information

Cromaplast S.p.A., acknowledges the fundamental value of the correct information to shareholders, to competent bodies and persons in charge, to the significant facts concerning the company and accounting management and in no way justifies the actions of its collaborators that prevent control by bodies or organizations in charge.

Cromaplast S.p.A., favours a continuous, punctual and complete flow of information between corporate bodies, various company areas, management, various top figures and, where necessary, towards Public Authorities.

In any case, information transmitted to the outside and inside the organization itself, complies with the requirements of truthfulness, completeness and accuracy, also regarding economic, financial and accounting data.

5.4 Correctness in corporate management and use of resources

Cromaplast S.p.A., pursues its company purpose in compliance with the law and the Articles of Association, ensuring the correct operation of the company bodies and the protection of capital and participating rights of its shareholders, safeguarding the integrity of the share capital and assets.

5.5 Relations with partners

Cromaplast S.p.A., undertakes to ensure that, in compliance with the law and the Articles of Association, all shareholders are given equal information, thus encouraging the widespread and informed participation of them in the decisions within their competence.

Cromaplast S.p.A., directs its activities to the satisfaction and protection of its shareholders, working to ensure that the economic performances are such as to safeguard and increase the value of the company, to increase the usefulness of the shareholders themselves.

5.6 Confidentiality of information

Cromaplast S.p.A. ensures the confidentiality of the information in its possession, the observance of legislation on personal data and refrains from seeking confidential information through illegal means.

All the information available to the company is handled in compliance with the confidentiality and privacy of the parties involved.

In this regard, it is reiterated that anyone who in any way comes into possession of information that is of interest to the company or related to any stakeholder, must keep the information confidential and in no way must feel authorized to disseminate it or use it outside the operational purposes for which it has been authorized by the company management.

5.7 Value of human resources

Cromaplast S.p.A., acknowledges the centrality of the "Human Resources" stakeholder and the importance of establishing and maintaining relationships based on loyalty and mutual trust, valuing as much as possible the skills of the individual. In this sense, Human Resources are intended as both the employees and the collaborators who lend their work to companies in contractual forms different from that of subordinate employment.

All employees undertake to act loyally in order to comply with the obligations assumed by the employment contract and provided by this Code of Ethics, ensuring the services required of them and respecting the commitments undertaken, even through an explicit declaration of full acceptance of this document.

Cromaplast S.p.A., guarantees the physical and moral integrity of Human Resources, work conditions that respect individual dignity and safe and healthy working environments.

Therefore, requests or threat aimed at inducing people to act against the law and the Code of Ethics or to adopt behaviour that is harmful to the convictions and moral and personal preferences of each person are not tolerated.

5.8 Impartiality and non discrimination

In the decisions that have an influence on relations with its stakeholders, Cromaplast S.p.A., avoids any discrimination based on age, sex, sexual inclinations, health status, race, nationality, political opinions and religious beliefs of its interlocutors.

Cromaplast S.p.A., operates with impartiality, avoiding favourable treatment in all circumstances.

To guarantee the full implementation of such impartiality, no form of gift or gratuity is allowed, which can be understood as exceeding normal commercial or courtesy practices, or in any case aimed at acquiring favourable treatment in the conduct of any company activity.

Cromaplast S.p.A., has long decided to use, as a form of gift or gratuity, the financing of projects for the adoption and support of children at a distance, through the intermediation of recognized associations and with the communication to the public and to the social bodies of the funded projects.

In the management of hierarchical relationships, Cromaplast S.p.A., ensures that the authority is exercised with fairness and correctness excluding any abuse.

5.9 Prevention and management of conflicts of interest

Cromaplast S.p.A., prevents any form of conflict of interest.

Cromaplast S.p.A., acknowledges and respects the right of its employees, collaborators, directors, shareholders to participate in investments, business or other activities outside those carried out in the interest of the company, provided that they are activities permitted by law and by contractual provisions and compatible with the obligations undertaken towards the company.

The conflict between personal and societal interest manifests itself whenever a conduct or choice made in the workplace is capable of potentially also generating an illegitimate advantage for oneself or one's family, to the detriment of the best interest of the company.

5.10 Quality and safety of products

Cromaplast S.p.A., pursues its mission through the provision of quality products, at competitive conditions and in compliance with the mandatory regulations. This is also demonstrated by the desire to be ISO 9001 and IATF 16949 certified.

The behavioural style of the company towards customers is based on readiness, respect and courtesy, in terms of a collaborative and highly professional relationship. Specifically, in communicating with its customers, Cromaplast S.p.A., ensures completeness, correctness and clarity of all information concerning characteristics, content nature and origin of the products.

The contracts and communications addressed to customers of Cromaplast S.p.A. (including advertising) are and will be clear, truthful and complete.

Cromaplast S.p.A., ensures that products released on the market are compliant with national and community laws, activating all the controls needed for the purpose.

5.11 Responsibility towards collectivity and the environment

Cromaplast S.p.A., undertakes to managing its processes with environmental protection and efficiency criteria through the identification, management and control of its environmental aspects, as well as through the rational use of energy resources and the minimization of emissions, according to a development model compatible with the territory and the environment.

6. RULES OF CONDUCT

6.1 Shareholders

Cromaplast S.p.A., creates the conditions so that the participation of shareholders in the decisions of their competence is widespread and conscious.

The strategies of Cromaplast S.p.A., towards shareholders is mainly directed to:

- achieve maximum transparency towards the stakeholders of the company;
- respond to the legitimate expectations of shareholders;
- avoid any type of transaction in detriment to creditors;
- avoid discrimination of shareholders based on sex, race, language, religion, nationality, political opinions, personal and shareholder conditions;
- assure shareholders full participation in the exercise of social activity and the governance of the company.
- In the same manner, Cromaplast S.p.A., requires its shareholders to fully comply with the rules contained in this Code of Ethics.

6.2 Company information

Cromaplast S.p.A., ensures the keeping of accounting records, the formation and preparation of the financial statement, final balances, reports, prospectuses, general company communications and anything else required for its operation, in accordance with the provisions of law, principles, and current technical standards.

Each operation and transaction is correctly recorded, authorized and can be traced through computerized systems to allow easy accounting recordings, the identification of the different levels of responsibility and the exact reconstruction of the operation, also to reduce the probability of interpretative errors.

6.3 Human Resources

6.3.1 Personnel selection

The evaluation of personnel is carried out by matching the profiles of candidates with those expected and with the needs of the company, according to the principles of impartiality and equal opportunities for all parties involved, avoiding any form of favouritism, patronage and nepotism.

6.3.2 Managing human resources

Any form of discrimination against people is prohibited.

All decisions taken in the context of the management and development of human resources are based on considerations of merit profiles and/or correspondence between expected profiles and profiles held by collaborators. The same applies to access to different roles or tasks.

In managing hierarchical relationships, authority is exercised with fairness and correctness, avoiding any abuse.

It is an abuse of the position of authority to request, as an act due to the hierarchical superior, services, personal favours and any behaviour that constitutes a violation of this Code.

Human resources are fully exploited through the activation of the available levers to encourage their development and growth.

The competent functions must therefore:

- provide for selecting, employing, training, retributing and managing the employees or collaborators without any discrimination;
- create a work environment in which personal characteristics cannot give rise to discrimination;
- adopt criteria of merit, competence and however strictly professional for any decision concerning an employee or collaborator;
- guarantee all employees, shareholders, collaborators a healthy and safe work environment;
- inform all employees and collaborators of all legislative, contractual and regulatory provisions and all operational and safety practices.

6.3.3 Health and safety

Cromaplast S.p.A., promotes and disseminates the culture of safety, developing awareness of risk management, also through specific training, promoting responsible behaviour and preserving, especially with preventive actions, the health and safety of all employees and collaborators.

All employees, collaborators and partners are required to strictly observe the rules and obligations arising from the reference standards in terms of health and safety, as well as all the measures of health and safety required by the internal procedures and regulations.

6.3.4 Managing information and privacy

The privacy of employees, collaborators, agents, partners, directors and shareholders and the confidentiality of information is protected in compliance with the relevant legislation, also through operating standards that specify the information received and the related methods of processing and storage, as envisaged by the DPS, to which all staff is required to strictly comply. Any investigation of ideas, preferences, sexual inclinations, personal tastes, private life and people's health is excluded.

Any information exposed by the worker is given to the human resources that keeps it and manages it as confidential information.

The company has set up closed report boxes, where requests by individual workers can be sent. If such reports jeopardize Business Continuity, an escalation process is implemented to the management for urgent resolution of the report.

6.4 Human resources duties

6.4.1 Obligations of conduct

Each employee, director, shareholder and collaborator of any capacity at Cromaplast S.p.A., must know the rules in the Code of Ethics and the reference standards that regulate the activity carried out within the scope of its function, deriving from the law or from internal procedures and regulations.

Each employee, director, shareholder, agent and collaborator of any capacity at Cromaplast S.p.A., must also explicitly accept their commitments deriving from this Code of Ethics, at the time of establishing the work relationship or when the Code of Ethics is first disclosed.

Specifically, each one has the obligation to:

- refrain from behaviour that is contrary to the rules contained in the Code of Ethics;
- contact their superiors, company contacts in the event of a request for clarification on how to apply them;
- promptly report to the superiors, to company contacts, any news, directly reported or reported by others, regarding possible violations or simple requests for violations;
- collaborate with the structures appointed to verify possible violations;
- adequately inform each third party with whom they come into contact in the workplace about the existence of the Code of Ethics and the commitments and obligations imposed by it to external parties;
- demand compliance with the obligations that directly affect their activity;
- adopt appropriate internal initiatives and external if they are within their competence, in case of non-fulfilment by third parties of the obligation to comply with the Code of Ethics.

6.4.2 Managing information

Employees, collaborators, partners, directors and shareholders are required to know the contents of the security planning document and implement what is foreseen of the company's policies on information security, to guarantee its integrity, confidentiality and availability.

It is the duty of every employee, collaborator, partner, shareholder and director to ensure the confidentiality required by the circumstances for each piece of news learned on the basis of their work function.

In this regard, it is reiterated that anyone who in any way comes into possession of information that is of interest to the company or related to any stakeholder, must keep the information confidential and in no way must feel authorized to disseminate it or use it outside the operational purposes for which it has been authorized by the company management.

6.4.3 Conflicts of interest

Each employee, collaborator, director, shareholder of Cromaplast S.p.A. shall avoid all situations and all activities that may create a conflict with the interests of the company or that may interfere with their own capacity to take impartial decisions in the best interests of the company and in full compliance with the Code of Ethics.

Any situation that may constitute or give rise to a conflict of interest must be promptly notified by any employee, collaborator, shareholder, director to their superior or company representative.

In particular, employees, collaborators, directors, shareholders of Cromaplast S.p.A. are required to avoid conflicts of interest between personal and family economic activities and their tasks within the structure they belong to.

By way of example, but without limitation, conflicts of interests are determined by the following situations:

- carrying out duties of or having economic or financial interests with suppliers, customers, competitors or business partners of Cromaplast S.p.A.;
- using your position in the company or the information acquired in your work in a way that could create conflict between your personal interests and the interests of the company;
- carry out work, of any kind, with customers, suppliers, competitors;
- accept or offer money, favours or benefits from persons or companies that are or intend to enter into business relations with Cromaplast S.p.A.

6.4.4 Use and protection of assets owned by the company

Each employee, collaborator, agent, partner, shareholder of Cromaplast S.p.A. is required to operate with due care and diligence to protect the assets owned by the company, through responsible behaviour and in line with the operating procedures established to regulate use, by documenting their use where appropriate.

Each employee, collaborator, agent, partner, shareholders, administrator of Cromaplast S.p.A. is responsible for the protection of the resources entrusted to them and has the duty to promptly inform the structures in charge of any threats or events harmful to the company itself or its assets.

In particular, each employee, collaborator, partner, shareholder, director of Cromaplast S.p.A. is required to:

- avoid improper use that may cause undue costs, damages or reduced efficiency or otherwise in contrast with the interests of the company;

- in using the means of communication made available by the company (PCs, fixed and mobile phones, network connection tools, etc.), take every precaution useful to prevent any form of use contrary to the law and internal regulations of Cromplast SpA.; in the case of use of the means in question outside the contractually established purposes, it is necessary to have a formal authorization from the company;
- scrupulously adopt the provisions of the policies, the D.P.S., and internal procedures, in order not to compromise the functionality, protection and security of IT systems, equipment and plants of the company;
- always operate in compliance with the safety regulations established by the Law and internal procedures, to prevent possible damage to property, persons or the environment;
- scrupulously follow the indications of company signage in terms of access and use of individual protection devices;
- use the assets owned by the company, of any type and value, in compliance with the law, internal regulations, and the principles of this Code of Ethics;
- use the company's assets exclusively for purposes connected to and instrumental to the exercise of their work; however, the use or transfer of the assets by third parties or to third parties, even temporarily, is forbidden, except when required by specific regulations or company agreements;
- operate, as far as possible, to reduce the risk of theft, damage or other threats to assets and resources assigned or present, by informing persons in charge in a timely manner in case of anomalous situations.

6.4.5 Gifts, gratuities and benefits

In business relationships with stakeholders, any donations, benefits (whether direct or indirect), gratuities, acts of courtesy and hospitality are forbidden, if not of modest value, so as not to compromise the image of the company and not to be able to be interpreted as aimed at obtaining favourable treatment.

In any case, any gratuities, acts of courtesy and hospitality are managed only by authorized company managers. Any sponsorships or donations for charity are managed by the Chairman, or by strictly authorized persons.

Any employee, collaborator, agent, shareholder, director who receives/offers gifts or preferential treatment that go beyond normal relations of courtesy, must immediately inform their superior. The latter will immediately notify the specific bodies and/or the competent person in charge who, after preliminary checks, will take the appropriate measures.

The management of relations with stakeholders is based on extremely clear relationships, avoiding, as far as possible, excesses of mutual dependence.

6.5 Customers

6.5.1 Behavioural style towards customers

The behavioural style of the company towards customers is based on readiness, respect and courtesy, in terms of a collaborative and highly professional relationship.

Cromplast S.p.A. pursues its mission through the provision of quality products/services, at competitive terms and conditions and in compliance with all the rules aimed at protecting fair competition.

Employees, collaborators, partners, shareholders and directors of Cromplast S.p.A. are obliged to:

- provide high-quality products or services, which satisfy the reasonable expectations and needs of the customer with efficiency, courtesy and promptness, within the limits of contractual provisions;
- provide, where necessary and in the manner envisaged by company policies, accurate and thorough information about the company's products or services, so that the customer can make informed decisions;
- meet customers' expectations in terms of honesty, transparency and full compliance with the law and contractual agreements;
- uphold the truth in advertising or other types of communication.

6.6 Suppliers

6.6.1 Selecting suppliers and contractors

The selection of suppliers and contractors, and the determination of purchase conditions, are based on objective parameters, such as quality, convenience, price, capacity, efficiency, ethics, compliance with the law.

Therefore, reference requirements for Cromplast S.p.A. are:

- the professionalism of the interlocutor;
- the availability, appropriately documented, of means, including financial, organized structures, capacity and design resources, know-how, etc.;
- the existence and effective implementation of quality, safety and environmental management systems;
- maintaining environmentally friendly conduct;
- maintaining conduct that does not have an adverse effect on the image and the good name of Cromplast S.p.A.

In contract or procurement relations and, generally, of goods and services, Cromplast S.p.A.:

- adopts, in selecting the supplier, the evaluation criteria envisaged by existing procedures, in an objective and transparent manner, requesting documentation attesting the professional technical skills, the fulfilment of contributory and legal fees and the provisions in terms of technical instrumentation and safety in the workplace, before making the selection;
- does not preclude anyone, in possession of the required requisites, from being able to compete in the stipulation of contracts, using objective and documentable criteria in the selection of candidates;
- ensures sufficient competition for any tender or bid request; any exceptions must be authorized and documented;
- observes the contractually foreseen conditions and verifies their full compliance over time;
- maintains a frank and open dialogue with suppliers, in line with good commercial practices;
- observes and expects compliance with all obligations imposed by current legislation, regarding the environment, safety, public contract, tax and social security contributions, in the context of contract, supply and procurement relations;
- ensures the transmission of all the information needed to ensure the execution of services in full compliance with current legislation.

6.6.2 Protection of ethical aspects in supplies

With a view to adapting the procurement of goods and services to the ethical and environmental principles of reference, Cromplast S.p.A., may request, for particular supplies, social and/or environmental requirements. To this end, specific clauses may be drawn up in individual contracts.

6.7 Environment and safety

Cromplast S.p.A., considers issues related to the environment and workers' safety to be of great importance.

To this end, in the management of company activities, the company takes into account environmental protection and energy efficiency, pursuing the improvement of health and safety conditions at work.

As part of their duties, employees, collaborators, directors, shareholders, partners and suppliers of external services, participate in the process of risk prevention, environmental protection and protection of health and safety towards themselves, colleagues and third parties.

In particular, Cromplast S.p.A., through the active collaboration of its employees, collaborators, agents, administrators, shareholders, partners, suppliers of external services, also:

- promotes and implements all reasonable initiatives aimed at minimizing risks and removing the causes that could jeopardize the safety and health of individuals, excluding any form of exception or derogation from the internal procedures adopted for this purpose;
- pays continuous attention and commitment to improving its environmental performance, minimizing the negative impact on the environment and operating a conscious and responsible use of natural resources;
- collaborates with its stakeholders, both internal (e.g. employees) and external (e.g. institutions), to optimize the management of profiles relating to Health, Safety and Environment issues;
- maintains high safety and environmental protection standards in compliance with current legislation;
- adopts a policy of using products compatible with the protection of the Environment and Safety of workers.
- transmits and requests to receive all the information, documentation and certifications necessary to ensure total compliance with the binding legislation, with particular reference to safety and hygiene in the workplace, environmental protection and correct management of work relationships.

The decisions in terms of health and safety at work are taken by the company based on several fundamental principles and criteria, specified in the international and national regulations, and in particular in Legislative Decree 81/2008 and subsequent amendments. These principles and criteria can be summarised as follows:

- avoid risks;
- assess risks that cannot be avoided;
- fight risks at the source;
- adapt work to the individual, for example in the conception of the workplace, in the choice of equipment and work methods;
- consider the degree of evolution of the technique;
- replace what is dangerous with what is not dangerous or less dangerous;
- plan prevention, aiming at a coherent complex that integrates the technique, the organization of work, working conditions, social relations, and the influence of factors in the work environment;
- give priority to collective protection measures, regarding individual protection measures;
- give adequate instructions to workers;
- prepare an accurate training and information system to and from employees, collaborators, agents, shareholders, directors, corporate bodies, partners, contractors and suppliers in general;
- guarantee, in any case, the adoption of all the measures that, according to the particularity of the work, the experience and the technique, are necessary to protect the physical integrity and the moral personality of the workers.

6.8 Collectivity

Cromplast S.p.A., is aware of the effects of its activity on the reference context, on economic and social development and on the general wellbeing of collectivity, and focuses, in its work, on balancing its interests.

Cromplast S.p.A., believes that dialogue with stakeholders is of strategic importance for the proper development of its business and establishes, where possible, a stable channel of dialogue with the associations representing its stakeholders, to cooperate in compliance in mutual interests.

6.8.1 Relations with public institutions

Relations with public, local, national and international institutions are reserved exclusively for the functions and responsibilities delegated for this purpose.

Cromaplast S.p.A., undertakes to establish, without any kind of discrimination, stable channels of communication with all institutional interlocutors at the local, national and EU level.

These relationships must be oriented to criteria of maximum transparency and correctness, rigour and consistency, avoiding collusive attitudes.

6.8.2 Relations with political and trade union organizations

Cromaplast S.p.A., does not provide any contribution to parties, movements, committees and political and trade union organizations, nor to their representatives and candidates.

6.8.3 Relations with no-profit organizations

Cromaplast S.p.A., welcomes, and if appropriate, provides support for social and cultural initiatives aimed at promoting the person and improving quality of life, subject to approval by company managers.

6.8.4 Relations with mass media and dissemination of information

Relations with the press, the media and information and, more generally, the external interlocutors, must be maintained only by persons expressly delegated to do so, in accordance with the procedures and policies adopted by the company.

Communications to the outside follow the guiding principles of truth, correctness, transparency, prudence and are aimed at encouraging the knowledge of company policies, programs and projects.

Relations with the mass media are based on this principle and are reserved exclusively for the Chairmanship, which manages them in accordance with the policies adopted by the company.

The employees, collaborators, directors, shareholders cannot provide information outside or commit to providing it without authorization of the Chairmanship.

In no manner or form whatsoever can employees, collaborators, agents, directors or shareholders offer payments, gifts or other advantages aimed at influencing the professional activity of mass media functions, or which can reasonably be interpreted as such.

6.9 Public administration

The relations pertaining to the company's activities with public officials or public service representatives (who work on behalf of the central and peripheral Public Administration, or of legislative bodies, of the Community institutions, of international public organizations and of any foreign State), with the judiciary, with the public supervisory authorities and with other independent authorities, as well as with private partners, concessionaires of a public service, must be undertaken and managed in absolute and strict compliance with the laws and regulations in force, of the principles set out in the Code of Ethics, in a manner not to compromise the integrity and reputation of both parties.

To this end, the undertaking of commitments with Public Administrations and Public Institutions is reserved exclusively for the authorized persons in charge to perform them in due respect of the laws and principles of the Code of Ethics.

Cromaplast S.p.A., prohibits, its employees, collaborators, shareholders, partners, directors or representatives and, more generally, all those who work in its interest, in its name or on its behalf, to accept, promise or offer, even indirectly, undue money, gifts, goods, services, benefits or favours (also in terms of employment opportunities) regarding relations with public officials, public service employees or employees, in general, of Public Administration or other Public Institutions, or private subjects, to influence the decisions, in view of more favourable treatment or undue performance or for any other purpose.

Any employee, collaborator, agent, shareholders, director who receives directly or indirectly requests or offers of money or favours of any kind (including gratuities or gifts of no small value) formulated unduly to those, or by those who operate on behalf of Cromaplast S.p.A., in the context of relations with public officials, persons in charge of public service or generally, employees of the Public Administration (Italian or other foreign countries) or other Public Institutions, or with private subjects (Italian or foreign), must immediately report to the competent internal person in charge to take the consequent measures.

Each relationship with State institutions or international ones is, therefore, attributable exclusively to forms of communication aimed at explaining the activity of Cromaplast S.p.A., to respond to requests or acts of trade union inspection (interrogations, interpellations), or however, to make the company's position on relevant topics known.

6.9.1 Managing funding

Cromaplast S.p.A., in the requesting and managing of facilitations, contributions and funding of any kind obtained by the State, by another public body or by the European Union, expects compliance with legal, transparent and correct principles by its employees, collaborators and directors.

To this end, Cromaplast S.p.A., and its employees, collaborators, shareholders, directors and representatives of any capacity must:

- operate, without any kind of discrimination, through designated communication channels with the institutional interlocutors at a national and international, community and territorial level;
- represent the interests and positions of the company in a transparent, rigorous and coherent manner, avoiding collusive attitudes;
- avoid falsification and/or alteration of the statements or of the documentary data to obtain an undue advantage or any other benefit for the company and avoid destinations of public funds for purposes other than those for which they were obtained;
- carry out scrupulous checks on data contained in the declarations towards public bodies;

In any case, Cromaplast S.p.A., and its employees, collaborators, shareholders and directors undertake to reporting any news of conduct different to the above principles of which they become aware, even if by any competitors and/or partners.

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