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MOG – CE	CODE OF ETHICS	DATE 12/06/25

MOG-CE

Code of Ethics



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CHAPTER 1 - INTRODUCTION

1. TERMS AND DEFINITIONS

Please refer to **the MOG-PG**, paragraph I., "Definitions" and to **the Manual**, section 1.1.5, and to the A-MQ.ORG organisational chart updated on 22 April 2020.

2. INTRO

This **MOG-CE** recommends, promotes and prohibits certain behaviours, regardless of what is required by law.

In the management of its affairs, **Alvapack** intends to act in a transparent and fair manner, paying the utmost attention to the economic, social and environmental sustainability of its business activities.

3. ALVAPACK'S OBJECTIVES AND VALUES

Alvapack's objectives are:

- excellence in the manufacture of its products;
- innovation based on scientific research;
- the creation of value for customers;
- the creation of rewarding work and career opportunities for its employees;
- the creation of value for partners and associates.

Alvapack pays particular attention to the human factor: it promotes the development and professionalism of its staff and ensures maximum compliance with workplace health and safety and environmental regulations.

Alvapack's guiding values are sustainability, transparency and the enhancement of human resources.

4. COOPERATIVE APPROACH TO STAKEHOLDERS

Alvapack maintains and develops relationships of trust with its stakeholders, including, but not limited to, consumers, customers, employees, product and service suppliers, and shareholders.

5. GENERAL PRINCIPLES OF CONDUCT

In accordance with its ethical principles, **Alvapack** undertakes to:



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- manage commercial relationships in full compliance with all applicable laws, regulations and contracts;
- act with mutual respect;
- adhere to its moral and social obligations;
- complying with all regulations concerning the protection, health and safety of persons in the workplace;
- conserving resources and protecting the environment;
- never use company resources and/or assets for personal gain;
- operate with honesty and fairness.

6. VALIDITY AND DISSEMINATION OF THE CODE OF ETHICS

The **Code of Ethics** contains the fundamental principles that inspire **Alvapack's** activities and guides the conduct of its **senior managers, subordinates** and employees.

In particular, by way of example and without limitation:

- **Governance** takes into account the principles and values of this **MOG-CE** when setting business objectives;
- **Senior Management** gives substance to the principles and values contained in the Code of Ethics by assuming responsibility both within and outside the Company and strengthening trust, cohesion and team spirit;
- **Alvapack's** subordinates adapt their actions and behaviour to the principles, values, objectives and commitments set out in this **MOG-CE**.

The **Code of Ethics** is valid in all places where **Alvapack** operates, both in Italy and in the rest of the world.

The **Code of Ethics** will be made known to all those who have dealings with **Alvapack** through publication on its website.

In particular, **Alvapack**:

- disseminate the **Code of Ethics** to its employees by posting a copy on company notice boards and will organise special training days to promote awareness and compliance with the principles contained herein.



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CHAPTER 2 – GENERAL PRINCIPLES

2.1 HONESTY

Alvapack's senior management and employees are required to diligently comply with applicable laws, the **MOG**, the **Manual**, this **Code of Ethics** and the acts and provisions of the **Governance** and **Senior Management**.

Under no circumstances may the pursuit of **Alvapack's** interests justify dishonest conduct.

2.2 CONFIDENTIALITY

Except as provided for in Article 3.3.4 (IT Applications), **Alvapack** ensures the confidentiality of the information in its possession and refrains from seeking confidential data, except with express authorisation and in compliance with applicable legal regulations. Furthermore, **Alvapack** stakeholders are required to keep information concerning **Alvapack's** activities strictly confidential and not to use confidential information for purposes other than the performance of their duties.

2.3 IMPARTIALITY

Alvapack avoids any discrimination based on gender, age, health, sexuality, race, nationality, political opinions and religious beliefs in decisions that affect its interlocutors, in the choice of its stakeholders and in its relations with them (for example: the choice of customers to serve, personnel management or work organisation, the selection and management of suppliers, relations with shareholders, relations with the surrounding community, and the institutions that represent them).

2.4 FAIRNESS IN THE EVENT OF POTENTIAL CONFLICTS OF INTEREST

Except as provided for in Article 3.3.2 (Conflict of Interest), situations of conflict of interest, even if only apparent, must always be avoided in the conduct of any activity. This refers to cases in which an employee personally benefits from business opportunities of the company, or cases in which representatives of customers, suppliers or public institutions act in conflict with the fiduciary duties associated with their position.

2.5 VALUE OF HUMAN RESOURCES



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Alvapack's stakeholders are an indispensable factor in the company's success. For this reason, **Alvapack** protects and promotes the value of human resources in order to improve and increase the assets and competitiveness of the skills possessed by each stakeholder.

2.6 INTEGRITY AND DIGNITY OF THE PERSON

Alvapack guarantees the physical and moral integrity of its employees, working conditions that respect individual dignity and safe and healthy working environments. Stakeholders are offered equal employment opportunities based on professional skills and performance, without any discrimination, in full respect of human rights.

2.7 FAIRNESS OF AUTHORITY

When signing and managing contractual relationships that involve the establishment of hierarchical relationships, **Alvapack** undertakes to ensure that authority is exercised fairly and correctly, avoiding any abuse. In particular, **Alvapack** guarantees that authority will not be exercised in a manner that is detrimental to the dignity and autonomy of employees, and that work organisation decisions will safeguard the value of employees.

2.8 QUALITY OF SERVICES AND PRODUCTS

Alvapack is committed to satisfying and protecting its customers by listening to their requests in order to improve the quality of its products and services. For this reason, **Alvapack** directs its research, development and marketing activities towards achieving high standards of quality in its services and products.

2.9 ENVIRONMENTAL PROTECTION

For **Alvapack**, respect for the environment is a fundamental value for satisfying one of the primary needs of individual citizens and the community as a whole. The guidelines of the company's environmental policy are shared by all, therefore all production processes are carried out in full compliance with applicable environmental legislation and regulations.

Alvapack firmly believes that a careful and active environmental policy is an element of corporate enhancement.



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Alvapack contributes to the conservation of resources and the reduction of the environmental impact of its activities and related risks.

It therefore operates according to firm principles such as:

- sustainable management of natural resources and energy: maximising use and avoiding waste;
- improvement of production processes and business activities: creating new systems to prevent or reduce pollution by limiting the impact on the environment, seeking to predict and avoid accidents, protecting the health and safety of its employees, but also that of citizens, using the best available technologies for this purpose and taking care to maintain efficient and safe facilities;
- improving results: maintaining a high level of commitment to research and development of innovative systems by setting environmental objectives and implementing improvement programmes;
- integrated safety and environmental management: both inside and outside the workplace;
- compliance with environmental and safety regulations: monitoring the implementation and observance of relevant rules and developments in environmental regulations and legislation;
- raising staff awareness: providing adequate training and instruction to employees and collaborators at all levels in order to achieve high standards of professionalism and quality in safety, environmental and health interventions, thereby also increasing the sense of responsibility and awareness of the entire Company;
- dialogue and collaboration with local entities: maintaining constant and regular communication, the basis for fruitful collaboration, with local administrations, representative bodies, companies and any other potentially interested parties.

2.10 RESPECT FOR COMPETITION

Alvapack undertakes not to engage in any activity that could lead to the conclusion of anti-competitive agreements between two or more companies.

In particular, directors, employees, collaborators and anyone acting in the name and on behalf of **Alvapack** may not, under any circumstances, negotiate or be involved in any of the following activities: price fixing, including the coordination of price ranges,



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discounts and any other price elements, as well as discussing prices without actually fixing them; market sharing, such as allocating consumer groups or areas among competitors; agreements on investment levels or production quotas; exchange of sensitive information on competition, for example, on industrial plans, customer relations and current or future tenders; agreements to restrict competition in trade, such as export bans or bans on sales to parallel traders; joint negotiations, joint sales or (except following legal verification) joint purchases; any other agreement that restricts competition, such as a collective boycott; any agreement to avoid direct competition or joint action to exclude competitors or new entrants.

2.11 RELATIONS WITH GOVERNMENTS AND PUBLIC INSTITUTIONS, SUPERVISORY AUTHORITIES, POLITICAL AND SUPERVISORY ORGANISATIONS

Alvapack's relations with public institutions are based on compliance with legal and regulatory provisions (national and international), company procedures, and the values of fairness, impartiality, loyalty, honesty and transparency.

Alvapack is committed to fully and scrupulously implementing the rules laid down by public supervisory authorities for compliance with current legislation. Relations with political and trade union organisations are characterised by the principles of impartiality and independence.

CHAPTER 3 - CONDUCT CRITERIA

3.1 ADMINISTRATIVE MANAGEMENT AND FINANCIAL STATEMENTS

Alvapack complies with current laws and regulations and adopts the most advanced accounting practices and principles in the preparation of its financial statements and any other required accounting documentation. The accounting records and financial statements faithfully represent the facts of management (economic, equity and financial) according to criteria of clarity, truthfulness and fairness.

The administrative/accounting systems allow for the adequate reconstruction of individual management events and accurately represent corporate transactions, allowing for the identification of the reasons for the transaction.

Alvapack adopts all the necessary tools to direct, manage and verify operational activities, with the aim of ensuring compliance with laws and internal



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procedures, protecting company assets, managing activities efficiently and providing truthful and complete accounting and financial data. The internal control systems are designed to verify and guide the organisation of **Alvapack** and respond to these needs:

- ensuring that the various company processes are effective, appropriate, consistent, efficient and economical;
- verifying compliance with regulations, directives and company policies;
- guaranteeing the reliability and accuracy of accounting records and safeguarding company assets.

Each recipient of the Code, within the limits of their functions and duties, is responsible for defining and ensuring the proper functioning of the control system.

3.2 RELATIONS WITH EMPLOYEES

3.2.1 STAFF SELECTION

The search for and selection of personnel is based on criteria of objectivity, competence and professionalism and guarantees equal opportunities, avoiding any favouritism in order to ensure that the company has access to the best skills available on the market.

3.2.2 HEALTH AND SAFETY

Alvapack is committed to spreading and consolidating a culture of safety by developing risk awareness and promoting responsible behaviour on the part of all employees.

Alvapack also works to protect the health and safety of workers and the interests of stakeholders through preventive measures, in accordance with the accident prevention and workplace health and hygiene requirements set out in **the TUS** (Italian Occupational Safety and Health Act).

3.2.3 PRIVACY PROTECTION

Alvapack complies with the provisions on the confidentiality of personal data contained in Legislative Decree No. 196/2003 and EU Regulation No. 679/2016.

In compliance with this legislation, **Alvapack** informs each employee about the nature of the personal data being processed, the methods of processing and the areas of communication, and takes measures to ensure confidentiality.



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3.2.4 INTEGRITY AND PROTECTION OF THE INDIVIDUAL

Alvapack is committed to protecting the moral integrity of its employees by guaranteeing their right to working conditions that respect their dignity. For this reason, it protects workers from psychological violence and combats any attitude or behaviour that is discriminatory or harmful to individuals, their beliefs and their preferences.

3.3 DUTIES OF EMPLOYEES

3.3.1 DILIGENCE AND GOOD FAITH

All stakeholders must act lawfully and in good faith, complying with their contractual obligations and ensuring the required performance. They must also be familiar with and comply with the Code, basing their conduct on respect, cooperation and mutual collaboration.

The Code will be made available to employees, who must sign a declaration of awareness in which they undertake to comply with the principles contained therein.

3.3.2 CONFLICT OF INTEREST

Each employee must carry out their work in the exclusive interest of **Alvapack**, avoiding situations in which conflicts of interest may arise, and must not take personal advantage of business opportunities that come to their knowledge in the course of their duties. By way of example, and without limitation, the following situations constitute conflicts of interest:

- accepting money, gifts or favours of any kind from individuals, companies or entities that have business relationships or are in negotiations with **Alvapack**;
- using one's position in the company or information acquired in the course of one's work to gain personal advantage;
- concluding, finalising or initiating negotiations and/or contracts, in the name and/or on behalf of **Alvapack**, with family members or associates of the employee, or companies or legal entities owned by or in which the employee has an interest.

In the event of a conflict of interest, the employee is required to notify the company.

3.3.3 CONFIDENTIALITY



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Employees are required to maintain the utmost confidentiality regarding information, documents, studies, initiatives, projects, contracts, plans, etc. learned in the course of their work, particularly when they could compromise the image or interests of customers and the company. All information, and in particular that acquired in the course of activities carried out for clients, must be considered confidential and may not be disclosed to third parties or used to obtain direct or indirect personal benefits.

3.3.4 IT APPLICATIONS

All employees are required to:

- scrupulously comply with company security policies so as not to compromise the functionality and protection of IT systems;
- refrain from sending threatening or abusive emails and from making inappropriate comments that may cause offence to individuals and/or damage the company's image;
- not browse websites with indecent and offensive content.

3.3.5 RELATIONS WITH SUPPLIERS, PARTNERS AND EXTERNAL COLLABORATORS

Alvapack constantly monitors its relationships with suppliers, including financial and consulting contracts. The conclusion of a contract with a supplier must always be based on extremely clear terms.

It is forbidden to pay external collaborators remuneration that is not justified in relation to the type of task to be performed.

3.3.6 RELATIONS WITH PUBLIC OFFICIALS AND PUBLIC SERVICE EMPLOYEES

In relations with public officials and public service employees, conduct must comply with applicable laws and regulations and must not compromise the integrity or reputation of **Alvapack** in any way.

Only **senior managers** or persons appointed by them may enter into commitments and manage relations with public officials and public service employees.

In the context of relationships established with public officials and public service employees, the recipients of the Code must not:



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- offer, even through an intermediary, money or other benefits to the official involved, their family members or persons connected to them in any way;
- seek or establish personal and professional relationships of favour, influence or interference that may directly or indirectly affect the outcome of the relationship.

3.3.7 GIFTS

It is forbidden to promise or provide any gifts or gratuities to public officials or public service employees.