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Company policy – code of ethics

Introduction

CTP S.r.l., which is active in the promotional plastic and perfumed rubber sector, has always inspired its business based on ethical integrity principles and considers it appropriate to provide the company with a code that collects these values and established principles and rules of conduct in which management, employees, customers, suppliers, external collaborators and any person who cooperates with us must comply with.

The Code of Ethics therefore gathers the principles and general rules of conduct that need to be observed in order to guarantee the proper functioning, reliability and reputation of CTP S.r.l.

Scope of application

This code is intended for management and employees acting in the name and on behalf of CTP (hereinafter called "Recipients").

CTP considers the respect for laws and regulations applicable in all the countries in which it operates, along with fairness and transparency in the conduct of business, as the essential principle of its activity.

As a result, CTP promotes the creation of an environment characterized by a strong sense of ethical integrity in the belief that this contributes in a decisive manner to the effectiveness of policies and control systems.

In particular, company members are required to be guided by the principles of the code of ethics when setting company objectives, proposing investments, carrying out projects and in any decision or action related to management.

Similarly, the company departments heads and employees must be inspired by the same principles, both internally, thus strengthening cohesion and the spirit of mutual cooperation, and towards third parties, with explicit prohibition to resort to illegitimate favouritism, collusive practices, corruption and/or solicitation of personal advantages for either themselves or others.

CTP undertakes to ensure maximum circulation of this code of ethics by publishing it on its website and making it available on the company notice board.

Ethical principles

In order to achieve its objectives, CTP complies with the following ethical principles (hereinafter also called "Principles"):

- compliance with the laws and regulations in force in all the countries in which the company operates;
- legitimacy, loyalty, correctness, transparency;
- confidentiality;
- respect for the value of people and human resources;
- respect for competition as an indispensable tool for the development of the economic system;
- respect for the environment and awareness of environmental protection.



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Child labour

CTP S.r.l. does not employ individuals under the age of 16, unless permitted by local law and if this exception is consistent with the ILO guidelines.

The company keeps records of each individual's date of birth and/or has legal means to confirm the age of each individual.

Voluntary labour/forced labour

CTP S.r.l. employs all its employees on a voluntary basis and does not use any form of imprisonment, slavery, coercion and bonded labour and undertakes not to use any other form of forced labour, or any other form of slavery or trafficking of human beings.

Migrant labour

CTP S.r.l. recognizes the unique legal, social and cultural situations that migrant workers face and ensures that these workers are treated with dignity, respect and in accordance with the same rules that apply to other workers.

Abuse, harassment, disciplinary action

CTP S.r.l. abstains from physical, mental, verbal and sexual abuse or any other form of abuse, inhuman or degrading treatment, corporal punishment or any other form of harassment.

The company treats all employees with respect and dignity and complies with local laws regarding disciplinary practices.

Equal treatment/discrimination

The terms and conditions of employment at CTP S.r.l., including recruitment, training, working conditions, remuneration, allowances, promotions, discipline and dismissal or retirement are based on the qualifications, performance, abilities and experience of each individual.

Remuneration and compensation

CTP S.r.l. remunerates all employees fairly, offering salaries and allowances in accordance with the CCNL (National Collective Employment Contract) and all applicable laws.

The company provides each employee with a detailed account of their salary.

The salary slip includes, as minimum requirements, the amount of the salary, the reference working period, the salary rate, the regular and overtime hours worked and deductions and allowances, if any.

Working hours

CTP S.r.l. complies with all applicable laws concerning working, resting and overtime hours.

Freedom of association/collective bargaining

CTP S.r.l. respects the right of employees to form trade unions and to join them and the right to collective bargaining in a lawful and peaceful manner, in accordance with the applicable regulations.

Health and Safety

CTP S.r.l. acts in compliance with all applicable laws on health and safety at work.



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Environment

CTP S.r.l. acts in accordance with all applicable environmental laws and regulations and constantly strives to improve environmental performance.

The company documents and maintains an archive of compliance with applicable local and national environmental laws and regulations, including environmental permits and reporting obligations.

CTP S.r.l. correctly manages and conserves hazardous materials and wastes, has a hazardous waste disposal plan and disposes them in a safe and legal manner.

The company ensures that the personnel concerned is adequately informed of the company's significant environmental impact and has been instructed of the company's environmental management system.

CTP S.r.l. minimizes and controls its environmental impact, where possible, through a reduction in greenhouse gas emissions, energy efficiency initiatives, reduction and recycling of natural resources, including water and paper/packaging materials.

Considering the objectives taken on by REACH in the European Union, CTP S.r.l. adopts a restrictive measure on all chemicals with high levels of danger, with the aim of reducing environmental impact and protecting the health of workers and consumers. In this regard, see Annex 1 "Notification of dangerous substances and/or mixtures".

Applying the ethical principles: obligations of the recipients

Employees and collaborators work by contributing to the achievement of the corporate purpose with professional rigor, loyalty, honesty and good faith, correctness, commitment and spirit of mutual cooperation.

The criteria of collaboration, loyalty and mutual respect must characterize the relationships between the employees at any level, and between these and third parties, with whom they may come into contact as a result of the work they carry out.

In particular, employees and collaborators are required to:

- know and comply with internal procedures regarding authorised absences, holidays, reimbursement of expenses, providing adequate documentation;
- know and envisage any business forecast regarding the security and circulation of information relating to the company and its competitors;
- use the company assets diligently and exclusively for purposes related to carrying out the duties assigned;
- use computer systems carefully with the absolute prohibition to carry out any manipulation on the data contained in them;
- diligently observe the provisions of this code of ethics, refraining from any behaviour that may be contrary to it.



Company policy – code of ethics

The value of each person and human resources

CTP S.r.l. promotes the value of each person via respect for their physical, cultural, and moral integrity, protecting its employees and collaborators from discrimination for reasons pertaining to nationality, race, ethnicity, religious beliefs, political and trade union affiliation, language, age, sex and sexuality. In this sense, the Recipients must actively collaborate to maintain a climate of mutual respect for everyone's dignity and duties.

The Company considers its employees and collaborators as a precious and indispensable resource for both its existence and its future development.

In order to enhance the skills and competences of its employees, CTP adopts merit criteria and guarantees equal opportunities to all, without any discrimination, so that:

- the selection and assessment of the personnel is carried out based on the objective criteria that corresponds to the professional profiles and competences of the candidates with respect to the company's needs while respecting the candidates' equal opportunities;
- the information gathered in the selection process context is strictly linked to the verification of the professional profile sought, respecting the candidate's privacy and personal opinions;
- personnel is hired in accordance with the types of contracts required by current legislation and by the applicable CCNL;
- assigning tasks is defined taking into consideration the skills and abilities of the individual, based on the company's needs and professional growth of its employees;
- management, training and development policies are aimed at supporting employees in their career path and constantly updating their skills in order to allow everyone to carry out their role and to achieve company objectives;
- the remuneration system is defined on the basis of the role of the employees and the skills and competences that it requires, as well as the results achieved and the continuous and systematic comparison with the external reference market;
- the collection of information and the collection and production of documents during the selection and management process, as well as their preservation on paper or computerized media, is carried out in full compliance with the law on privacy in force.

CTP is committed to establishing a culture of safety and health for the workers within the workplace, promoting risk awareness and accountability of individual behaviour.

Confidentiality

CTP protects the personal data processed within its activity with the objective of avoiding its improper or illicit use and consequently adopts specific procedures aimed at:

- adequate information provided to the interested parties;
- obtaining consent of the interested parties where necessary.

Each Recipient must standardize his/her behaviour to the utmost confidentiality even outside working hours in order to safeguard the company's technical, financial, legal, administrative, personnel management and commercial know-how.



Company policy – code of ethics

Furthermore, all those who, when carrying out their duties, have the material availability of confidential and relevant information, are required to avoid any improper use or misuse of information.

Should the Recipients wish to make a complaint, it is advisable to send an e-mail (even anonymously) to the dedicated e-mail address qualita@ctp-srl.it, which will be addressed by Management.

Correctness and transparency of accounting and internal controls

CTP S.r.l., in managing its accounts, acts in strict compliance with the applicable laws, including regulations, concerning the preparation of financial statements and, more generally, the mandatory administrative and accounting documentation.

Every action, operation, or transaction must be correctly recorded in the company accounting system according to the criteria indicated by the law and the applicable accounting standards and, moreover, must be duly authorized, verifiable, legitimate, consistent and congruous in compliance with internal procedures.

The company requires and promotes full compliance with internal control processes, as a tool for improving corporate efficiency.

The internal control system consists of the control activities which the individual corporate functions carry out on the processes, in order to protect the company's assets, effectively manage the corporate activities and provide clear information on the company's capital, economic and financial situation, as well as the activities aimed at identifying and limiting corporate risks.

Relations with third parties

CTP S.r.l. is particularly careful when it comes to developing a relationship of trust with all its possible interlocutors.

In carrying out its activities, the company conforms to the principles of loyalty and fairness, requiring all those who act on its behalf a conduct that is honest, transparent and compliant with the law; it does not tolerate corruptive and/or collusive conduct, or favouritism that is not due.

Relations with clients

The relationship with the customer must favour, to the extent possible and in compliance with the company's procedures, maximum customer satisfaction.

Customers must be given comprehensive and accurate information on the products supplied to them so as to enable them to make informed choices.

CTP S.r.l. guarantees adequate quality standards of the products offered and undertakes to periodically monitor the quality of the product.

Relations with suppliers and external consultants

Our company philosophy requires us to work only with suppliers who have the ability to constantly meet our standards and specifications and who are committed to respecting conduct values compatible with ours.

The choice of suppliers and consultants is carried out according to the criteria of competence/professionalism, value for money, correctness and transparency.



Company policy – code of ethics

When selecting suppliers and external consultants, as well as determining the conditions of purchase of goods and services, or when assigning professional services, the Recipients must try to obtain the maximum competitive advantage for CTP S.r.l. by selecting the supplier or consultant that is capable of providing goods and services of the required quality at the most convenient terms and conditions.

The signing of a contract with a supplier must always be based on extremely clear relationships, avoiding, where possible, the assumption of contractual obligations that involve forms of dependence for the contracting supplier or for CTP S.r.l.

The fees and sums paid to suppliers and consultants for supplies and professional services must be in line with market conditions and adequately documented.

Relations with the public administration

Relations with the public administration are exclusively instrumental, in order to obtain any authorizations necessary for carrying out company activities, aimed at assessing the implications of laws and regulations with respect to the company's activities, necessary in response to requests put forth to the CTP by the public administration, in carrying out its institutional activity.

Relations with the public administration must always be clear, transparent and correct and as such should not be susceptible to ambiguous or misleading interpretations.

Relations with judicial authorities and other institutional authorities

Managing relations with judicial authorities and other institutional authorities is reserved exclusively to those in the company with relevant duties and responsibilities.

The Recipients are required to provide the maximum availability and cooperation towards the judicial authorities and/or other institutional authorities during any checks or inspections they may have arranged.

Relations with other interlocutors

The company's relations with private entities, such as ONLUS organizations and other non-profit organizations must be inspired by the strictest observance of the applicable legal provisions and cannot, in any way, compromise the integrity and reputation of the company.

Taking on commitments and the management of relationships, of any kind, with private bodies, are reserved exclusively to those in the company with relevant duties and responsibilities and authorized personnel, according to the system of delegations and company procedures.

Approval of the Code of Ethics and related amendments

This code of ethics was implemented by the company management on January 1, 2015 with immediate effect.

The subsequent modification and integration was carried out on May 30, 2018.

The code of ethics does not replace current and future corporate procedures, which continue to be effective insofar as they do not conflict with the code of ethics.