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## Code of Ethics



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### **Foreword**

The Board of Directors of OPAC Srl has resolved to adopt this Code of Ethics (hereinafter also referred to as the "Code") for OPAC and all its subsidiaries (hereinafter referred to as "the Company") in order to clearly and transparently define the values that inspire its actions and activities.

This Code summarizes the ethical principles that the company's management, employees, consultants, collaborators, agents, suppliers, business partners, and all those who act on behalf of or in the name of the Company (hereinafter "Recipients") are required to comply with and enforce.

The Code represents a guideline for the drafting of the Company's internal regulations and procedures and is shared with all organizations with which the Company maintains relationships.

Through this Code of Ethics, the Company aims to:

- Express the values and ethical principles that define its culture and underpin its relationships with its Stakeholders;
- Uphold the values that characterize a virtuous company, including compliance with regulations, fairness, protection and respect for individuals, environmental protection, commitment, transparency, attention to worker safety and health, as fundamental elements of its business activities;
- Indicate to its employees, directors, collaborators, and commercial agents the principles of conduct and responsibilities to which they must refer in the context of their roles and responsabilities.

Anyone can consult the Code in electronic format on the Company's website, on the corporate Intranet, or request a printed copy from the Human Resources office.

## OPAC and Social Responsibility <sup>1</sup>

Excellence, innovation, and "made in Italy". OPAC is a cosmetics company with decades of experience, operating in the wet wipes sector and recently expanding into skin care. It specializes in the creation and production of tailor-made cosmetics for third parties, always offering innovative solutions in terms of formula, packaging, or materials.

OPAC began operations in 1989 through the work of Angelo Bartesaghi, previous founder of OMET in the 1960s. OMET was one of the most important and dynamic industries in the Lecco district, operating in the sectors of tissue converting, printing, and handling systems, and OPAC inherited its technological and organizational expertise, applying the philosophy of excellence to the world of cosmetics. Today, the Group led by the Bartesaghi family employs around 600 people overall and represents a leading international industrial player in all sectors in which it operates.

OPAC produces wipes for every need and offers a specific selection of environmentally friendly solutions. Its specialty is to create exclusive, customized products together with its clients, guaranteeing the highest quality standards by managing the entire product lifecycle in-house. Awarded both nationally and internationally for the innovation and quality of its range, OPAC bases its success on continuous investment in research and development, market reliability, and collaborations with highly qualified suppliers, universities, and scientific laboratories.

OPAC's growth has been marked over the years by expansions in workforce, product range, and facilities. However, its focus on people and their working environment—a common factor across all the Group's companies—has never changed. The values of the Bartesaghi family, which over the years has remained a point of reference and a source of stability and trust, have allowed tradition to merge with innovation, all while maintaining the utmost respect for both the environment and individuals.

In fact, OPAC has always operated with care and responsibility toward the community and the environment, voluntarily going beyond what is required by law. This commitment is reflected in its support for various local projects, particularly in the field of education. The company also contributes to projects of non-profit organizations engaged in health, sports, and cultural fields.

To formalize its commitment to social responsibility, OPAC has drawn up and approved this "Code of Ethics". Its purpose is to define the system of reference values and share it with stakeholders, contributing to the consistent and sustainable development not only of its own business, but of the entire civil, industrial, environmental, and social system in which it operates.

## Founding principles

The founding principles of OPAC's Code of Ethics are legality, honesty, integrity, fairness, transparency, sustainability, respect for labor, environment and people, with particular attention to work-life balance.

OPAC considers it a duty to communicate, as well as to respect, its ethical principles in a clear and transparent way, and to ask its stakeholders to share them.

This Code is therefore intended for all members of the management, corporate bodies, employees, and collaborators at every level, as well as all those who, for various reasons, act on behalf of or in the interest of OPAC, regardless of the legal nature of their relationship. All recipients are required to observe and enforce the principles of the Code of Ethics within the scope of their function and responsibilities, both in

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Italy and abroad. The Code of Ethics is also shared with all parties with whom the Company maintains business relationships and constitutes an element of evaluation the selection of partners and suppliers.

"Our history and future are built on family. And for families, both of this and future generations, we aim to create value and well-being. We have a passion for doing things well, because people are at the heart of our work and are the architects of our success.". (Antonio Bartesaghi)".

Antonio Bartesaghi, OPAC President

## Charter of values and principles

The Charter of Values and Principles identifies the ethical foundations that guide the Company's activities and establishes the behavioral guidelines for all those who work for and with its businesses.

## Legality

Compliance with the regulations in force in all countries where it operates is a fundamental principle for the Company and for all individuals and organizations with whom it has relationships. The Company experiences compliance not only as a requirement but also as an opportunity for harmonious and sustainable development from an environmental, social, and economic perspective.

## **Business Integrity**

The Company is guided by values of moral integrity, transparency, honesty, and good faith, and promotes their protection both inside and outside the workplace. It operates in adherence to fair and balanced competitive mechanisms, ensuring the achievement of its objectives while complying with all regulations safeguarding fair competition, in a framework of strong ethical standards and respect for the law. Unfair competitive practices are not tolerated. The Company is committed to bringing only high-quality products to market, ensuring they meet strict control standards.

## Respect for Individuals

The Company operates according to a civil coexistence pact, guided by principles of mutual respect and recognition, equal dignity, and valuing and integrating differences. It believes in the potential of individuals and bases its competitive capacity on the pursuit of excellence by focusing on employees' wellbeing, health and safety in the workplace, and professional development.

Every employee is entitled to fair, courteous, and respectful treatment from their superiors, subordinates, and peers. The Company recognizes and respects the personal dignity, privacy, and rights of any individual, both in internal and external relations. It supports diversity, promotes equal opportunities, and does not tolerate discrimination, harassment, bullying, or offense of any kind.

The Company places primary importance on safeguarding the health and safety of workers, aiming not only to comply with the relevant regulations but also to continuously inform and educate employees and improve working conditions.

The Company promotes internal professional development through education and training programs and encourages collaboration across departments.

## **Transparency**

The Company acknowledges the importance of transparency, accuracy, and completeness in financial reporting and strives to implement a reliable administrative and accounting system to accurately represent business activities and provide tools to identify, prevent, and manage, as far as possible, financial and operational risks, as well as fraud against the Company or third parties.

In documenting business activities, employees and collaborators are required to strictly comply with applicable regulations and internal procedures, ensuring that each transaction is not only properly recorded but also authorized, verifiable, and legitimate.

## Responsibility

The Company assumes responsibility for its decisions, actions, and impacts, and for honoring its commitments to various stakeholders.

### **Ethics and Communication**

The Company always acts with transparency, upholding integrity, fairness, loyalty, equity, impartiality, independence, and autonomy of judgment, as well as clarity in decision-making and implementation processes, and avoiding conflicts of interest. It is committed to disseminating complete, transparent, and comprehensible information to enable its stakeholders to make informed decisions regarding their relationships with the Company.

## Sustainability

Combining economic growth with social cohesion and the protection of the natural capital of each territory is a duty for every individual or business. The Company adopts a sustainable approach aimed at the efficient and effective use of resources, increasing their productivity, and respecting the environment in which it operates, to create sustainable value over time for the benefit of the entire community.

## Committment Charter

The Company expects its clients, suppliers, and stakeholders to adopt behaviors and approaches in line with the values, principles, and commitments outlined in this document. In no way may the conviction of acting for the benefit of the Company justify the adoption of behaviour that conflict with the principles set out in this Code or with applicable laws.

## Clients and Suppliers

The Company requires that all its suppliers, wherever they are based, fully comply with national regulations and this Code of Conduct throughout the period during which they supply products and/or services. This is an essential requirement for establishing and maintaining positive working relationships.

Relations with clients are based on honesty and clarity. The Company is committed to providing high-quality products and comprehensive information, paying the utmost attention to the health and safety of its clients and end consumers. All forms of communication must comply with the criteria of truthfulness, and any form of misleading advertising is strictly rejected.

#### **Human Resources**

The Company acknowledges that the contribution of its human resources is essential to the success of its business. For this reason, it ensures its employees and collaborators fair, safe, and respectful working conditions, promoting dignity, equal opportunities, and freedom from any form of discrimination or exploitation (see following section).

The Company also promotes the training, development, and enhancement of the skills and talents of its employees and collaborators, fostering both personal and professional growth. In line with its Corporate Social Responsibility (CSR) efforts, the Company aims to improve the quality of life for its employees and collaborators, helping th work-life balance.

The Company expects its suppliers to behave in accordance with the policies promoting the human capital outlined here, and it requires employees and collaborators to demonstrate loyalty, fairness, integrity, and fidelity, in accordance with the duties of their roles. The Company demands full compliance with applicable laws and the utmost helpfulness and cooperation from employees when interacting with representatives of public institutions, judicial authorities, law enforcement, public officials, or regulatory bodies that have inspection powers on behalf of any public administration.

## Shareholders, investors, and directors

The management, shareholders, and investors are required to observe the contents of this Code in their activities. The Company ensures fairness, clarity, and equal access to information, defining fees and compensations based on market conditions that are always justifiable.

# Associations, institutions, and organizations (national and international)

The Company interacts with associations, institutions, and organizations at various levels, depending on the issues addressed, while respecting the mutual and specific responsibilities, roles, and prerogatives of each, in a spirit of cooperation, loyalty, and transparency.

## Social partners

The Company has always positioned itself as a reliable and loyal partner in social and industrial relations, working constructively to address the changes in the scenario that affect everyone, and require a systemic and responsible approach.

## Community and territory

The role of businesses is crucial for the development of the territories and communities in which they operate. Due to its size, stability, and history, the Company plays a significant role in the market, contributing to the economic development and well-being of the communities in which it is present. The Company pursues sustainable development, creating value in the territory, particularly through initiatives that support education and training. It operates according to the principles of corporate citizenship, which involves integrating socially responsible considerations into its local, national, and global strategies.

## **Environment**

The Company believes that the protection of natural capital is fundamental, and invests to promote environmental protection, prevention, recycling, resource recovery, and the responsible protection and enhancement of ecosystems. It recognizes eco-efficiency and the green economy as factors of success and competitiveness in the current international market dynamics. For this reason, the Company acts in compliance with environmental laws and regulations adopted at both national and supranational levels in the countries where it operates.

*Environmental Permits* – The Company always operates with the necessary environmental permits and licenses for its operations.

Chemical Handling – Chemical containers must be labeled and stored safely. A Material Safety Data Sheet (MSDS) must be available (in the local language) in the workplace. Instructions in the MSDS must be followed.

Water Management and Wastewater Treatment – Water is a scarce resource in many parts of the world and must be used as efficiently as possible. All wastewater generated by processes must be treated before discharge. Wastewater treatment must comply with local regulations.

Waste Management – All waste, particularly hazardous waste, must be handled responsibly and in accordance with local laws.

## **Work Ethics**

The Company ensures the widespread dissemination of its Code of Ethics among employees and collaborators. Recruitment and selection procedures are conducted with absolute impartiality, autonomy, and independence of judgment, in full compliance with gender equality, applicable laws, and internal procedures.

Collaborators are made aware of and must comply with the provisions of the Code of Ethics. Within their capabilities, they are also encouraged to promote the Code's awareness among new employees and any third parties involved in its application through their professional interactions.

#### Collaborators have the obligation to:

- Refrain from behavior contrary to the provisions of the Code of Ethics and ensure compliance with it:
- Seek guidance from their superiors or the designated functions when clarification is needed on how to apply the Code;
- Promptly report to their superiors or the Control Body any direct or reported information regarding potential violations of the Code of Ethics, as well as any request to violate its rules;
- Collaborate in the verification of possible violations with the designated bodies.

The Company pays the utmost attention to the development and appreciation of its human resources. To this end, it considers meritocracy, professional competence, honesty, and fairness in behavior as key criteria for decisions concerning career advancement and other employee-related matters. Employees are expected to consistently conduct themselves with respect for the rights and personal dignity of colleagues, collaborators, and third parties, regardless of their hierarchical position within the Company.

The Company recognizes and respects employees' rights to participate in investments, businesses, or other activities outside their work for the Company, provided these activities are lawful and/or permitted by industry collective agreements, and compatible with the obligations undertaken as employees.

## Protection of employee dignity and integrity

The Company recognizes that human resources are an indispensable element for the existence, development, and success of the business, and that the motivation and professionalism of its staff are essential factors in maintaining competitiveness and creating value for shareholders. It is therefore committed to developing the skills and fostering the potential of its employees, so that they find realization in the achievement of its goals.

The Company offers employment opportunities to everyone based on specific professional qualifications and performance capabilities, without discrimination. The relevant functions select, hire, and manage collaborators based on competence and merit, without regard to race, religion, gender, age, ancestry, in compliance with applicable laws and regulations.

Employees or collaborators who believe they have been discriminated against can report the incident to the Human Resources department or their manager, who will verify if the Code of Ethics has been violated.

The Company reiterates its commitment to preserving the moral and physical integrity of its employees, collaborators, and consultants. The relevant functions ensure that the working environment is not only safe and healthy but also free from prejudice, where everyone is treated with respect, without intimidation, and with regard to their personal dignity, avoiding any undue discomfort or improper influence.

## Health and safety at work

The Company considers the environment and nature as fundamental values and shared heritage to be protected and preserved. As part of its activities, the Company is committed to contributing to the development and well-being of the communities in which it operates, with the goal of ensuring the safety and health of employees, external collaborators, customers, and the communities affected by its operations, while reducing environmental impacts.

The Company undertakes to manage its activities in full compliance with current regulations concerning environmental, health, and safety standards. Operational management must follow environmental protection and energy efficiency criteria, aiming to improve health and safety conditions at work. The Company is committed to fostering a culture of safety by raising awareness of risks and promoting responsible behavior among employees and collaborators, who, within their roles, participate in the risk prevention process, environmental protection, and the safeguarding of health and safety for themselves, their colleagues, and third parties.

General health and safety protection measures that the Company commits to adopting include:

- Health and safety risk assessment;
- Minimizing risks and limiting the number of workers exposed to risk;
- Prevention planning;
- Compliance with ergonomic principles in the workplace;
- Priority to collective protection measures over individual protection measures;
- Hygienic measures and health monitoring of workers based on specific risks;
- Emergency measures for first aid, firefighting, evacuation, and addressing serious and immediate dangers;
- Use of warning and safety signs;
- Regular maintenance of workplaces, equipment, machinery, and installations;
- Adequate information, training, consultation, and worker participation on health and safety issues in the workplace;
- Clear instructions for workers.

## Conflict of interest, fair competition, antitrust, and anticorruption

All employees and collaborators must ensure that business decisions are made in the Company's interest, avoiding any situation that could create a conflict of interest between personal or family economic activities and the duties held in the Company.

If a manager, collaborator, or employee is in a situation that could potentially create a conflict of interest, they shall promptly report it in writing to their superior for evaluation, and appropriate action will be taken if necessary. Employees are prohibited from engaging in activities on behalf of a competitor of the Company or from undertaking any competitive activities, even collateral.

In the case of paid collateral activities, the individual must inform their supervisor or higher-level manager in advance. Occasional or sporadic activities are not considered collateral. Authorization will be denied if the individual has relationships with the third-party company or individual while performing their duties for the Company.

Employees and collaborators must respect competition laws. Actions that may constitute a violation of antitrust laws include:

- Discussing prices, production, capacity, sales, bids, profits, margins, costs, distribution methods, or any other parameter with competitors to influence or align their competitive conduct with the Company's;
- Exerting any influence on resale prices charged to customers or attempting to impose restrictions on exports or imports of goods supplied by the Company.

Employees and collaborators are also prohibited from obtaining competitive information through industrial espionage, bribery, theft, or electronic surveillance, or from deliberately spreading false information about a competitor or their products/services. The Company competes fairly in the market based on the quality and price of its products, without offering undue advantages to third parties. Therefore, no employee or collaborator should offer, promise, grant, or authorize, directly or indirectly, the payment of money or anything of value to public employees and/or officials to influence official acts or obtain improper advantages. Any offer, promise, grant, or donation must be made in compliance with applicable laws and internal policies, and must not create the appearance of bad faith or improper conduct. This means that no offer, promise, grant, or donation should be made if it could reasonably be understood as an attempt to unduly influence a public employee or official or as an act of corruption involving a commercial counterpart to secure a business advantage for the Company.

## Workplace harassment

The Company requires that no harassment, whether internal or external, occurs in work relationships. This includes:

- Creating an intimidating, hostile, or isolating work environment for individuals or groups of workers;
- Unjustified interference with the performance of others' work;
- Hindering others' job opportunities for personal competitiveness.

The Company prevents and addresses, as far as possible, mobbing and personal harassment of any kind, including sexual harassment.

## **Anti-money laundering**

Neither the Company nor its collaborators must ever engage in or be involved in activities that could imply money laundering (i.e., the acceptance or handling) of proceeds from criminal activities in any form or manner. The Company and its collaborators must check available information (including financial information) about commercial counterparties, suppliers, and third parties in general to ascertain their respectability and the legitimacy of their activities before establishing business relationships. They must also comply with all applicable accounting, recording, and financial reporting provisions concerning cash flows and payments related to transactions and contracts. The Company must always comply with antimoney laundering regulations in any applicable jurisdiction.

## Child labour

The Company does not accept child labour. No person under the legal working age may be employed. It must take every necessary measure to ensure that no workers are hired below the legal age limit specified by national collective agreements concerning working hours applicable to each individual company.

Any legal restrictions on the employment of individuals under the age of 18 must be strictly respected. In accordance with the United Nations Convention on the Rights of the Child, the Company considers anyone under the age of 18 to be a child. It recognizes the rights of every child to be protected from

economic exploitation and from any task that is dangerous or that could interfere with their education or be harmful to their health or development (whether mental, physical, spiritual, moral, or social).

## Workers' rights

The Company does not accept any form of forced labor and does not employ incarcerated or illegal workers. Immigrant workers must be granted the same rights as local workers. Any commission or fee associated with the employment of immigrant workers must be borne by the Company, and workers must never be required to deposit their identity documents.

Every worker has the right to form or join associations of their choice, peacefully and in compliance with the law. Workers will not be subjected to disciplinary or discriminatory actions by the Company in exercising their right to association. No worker shall be discriminated against on the basis of gender, race, color, age, pregnancy, sexual orientation, religion, political opinion, nationality, ethnicity, illness, or disability.

All workers are entitled to a written employment contract, in the local language, detailing the terms and conditions of their work. Each Company is responsible for ensuring that all employees are aware of their legal obligations and rights.

## Wages, benefits, working hours, and leave

"Everyone who works has the right to just and favorable remuneration, ensuring for themselves and their family an existence worthy of human dignity..." (*Universal Declaration of Human Rights*).

- a. Wages must be paid regularly, within legally or contractually stipulated terms, and must be fair based on the worker's experience, qualifications, and performance. Workers must receive at least the legal or collective bargaining agreement (CBA) minimum wage, plus any allowances or benefits provided by the CBA or company-level agreements. No unjust deductions are allowed, and workers have the right to a detailed breakdown of how their salary has been calculated.
- b. Ordinary working hours must not exceed the legal limits. Overtime hours must never exceed the limits established by law or the CCNL, and must be carried out and compensated as provided by the CCNL and on a voluntary basis. Workers are entitled to at least one day of rest per week and will be compensated for leave hours to which they are legally entitled.

## Code of conduct

The Company operates with full assumption of responsibility towards all stakeholders involved in its activities. For this reason, it requires all parties with whom it engages to adopt the Company's Code of Ethics and adopt consequent behaviour.

By signing the Code of Ethics, all individuals working with and for the Company at various levels respect and promote its values, principles, and commitments towards the different stakeholders.

These parties therefore undertake to ensure:

- In all communities where they operate, compliance with laws, norms, and regulations, as the foundation of civil coexistence;
- Their contribution to the economic, social, civil, and cultural development of the country, through innovative processes aimed at widespread value creation, the promotion of the common good, and the establishment of excellence models:
- Fair, safe, and dignified working conditions for their employees and collaborators, ensuring equal
  opportunities and the absence of any form of discrimination or exploitation, promoting their
  human and professional development;
- Ethical and transparent behavior in all contexts, based on responsibility, integrity, fairness, loyalty, equity, and free market principles;
- That ethical, social, and environmental criteria are promoted in the selection of suppliers (vendor rating);
- In dealings with entities, institutions, political parties, media, and other public or private entities, to maintain integrity, independence, and respect for the specific responsibilities, roles, and prerogatives of each party;
- In environmental management, to implement advanced management practices aimed at prevention, recycling, and resource recovery, as well as a conscious protection and enhancement of ecosystems.

## Contractual value of the Code of Ethics

Observation of the rules and provisions contained in the Code of Ethics constitutes an integral and essential part of the contractual obligations undertaken towards the Company, whether these arise from employment relationships for employees, contractual regulations for non-subordinate collaborators, or from commercial relationships.

#### Communication

The Code of Ethics is communicated to all recipients through communication and training activities, and acceptance of its principles is required by signing a specific acknowledgment form. This Code is available on the Company's website and is distributed to recipients using the methods deemed most appropriate for effective dissemination.

## **Amendments**

The Code can only be amended or supplemented with the signature of the Legal Representative following a resolution of the Board of Directors.

## **Violations**

The Company is committed to enforcing this Code through the application of penalties provided for by the

National Collective Labour Agreement (CCNL) and current company regulations or the relevant contracts concluded with the counterparties.

Violations of the Code of Ethics constitute a breach of the obligations the employee or business partner has assumed towards the Company, whether they relate to employment, collaboration, administration, or supply relationships.

In the event of a violation of the principles contained in this Code of Ethics, where necessary for the protection of the Company's interests and in accordance with the current regulatory framework, including provisions derived from collective bargaining agreements, the relevant company bodies will assess the appropriate measures to be taken and any sanctions, including disciplinary and punitive actions, to be imposed on individuals who have engaged in non-compliant behavior with the Code of Ethics.

In such cases, any sanctions, which may be accompanied by further claims for compensation by the Company, may be applied:

- a) Against the Company's employees (blue-collar, white-collar and middle-collar workers), within the limits of the legal framework related to labor law, and also concerning the obligations of diligence required from employees in their duties;
- b) Against managers, in accordance with what is expressly stipulated in labor law;
- c) Against directors, in the form of suspension or revocation of their office;
- d) Against external collaborators and third parties, including in terms of terminating the relevant contractual relationships.

All the above-mentioned proceedings must, however, guarantee the confidentiality of the information and data involved, unless otherwise required by law or specific legal provisions.

The Company commits to protecting from any intimidation or retaliation those who, in good faith, report alleged or evident violations of the Code, pursuing the responsible parties with applicable disciplinary actions. Any unfounded report made in bad faith with the intent to harm colleagues and/or collaborators will be considered a violation and subject to disciplinary sanctions.

## Control body and implementation procedures

The person responsible for implementing and monitoring the Code of Ethics is the Head of Human Resources, who reports directly to the Board of Directors, and is entrusted with the following functions:

- Clarifying interpretive doubts and ethical dilemmas;
- Collecting reports of alleged violations;
- Ensuring the confidentiality of the whistleblower's identity, protecting them from any retaliation;
- Collaborating with the relevant departments to promote adequate training paths.

The Responsible can be contacted directly by any individual to whom this Code is directed via the email address: <a href="mailto:code">codiceetico@opac.it</a>.

## Commitment to the Code of Ethics - SUPPLIERS

This Code of Ethics defines the fundamental principles that all suppliers are required to respect within the framework of their collaboration with OPAC Srl. Compliance with these values is essential to ensure that business activities take place in a context of integrity, transparency, and social responsibility. Suppliers commit to operating in accordance with current regulations, safeguarding human rights, promoting safe and dignified working conditions, and adopting environmentally sustainable practices. Failure to comply with the Code of Ethics may result in the immediate termination of the collaboration.

#### For Suppliers:

I hereby confirm that I have read OPAC's Code of Ethics and agree to abide by its rules. I confirm that I am aware of the relevant laws and regulations applicable in the countries where we operate, and I take responsibility for informing all of my stakeholders about the contents of the Code, ensuring their compliance with it as well.

We understand that OPAC, or any third party designated by OPAC, has the right to request information and conduct unannounced audits at any location (either owned by us or by our subcontractors) where we manifacture, operate or offer services for OPAC or on behalf of OPAC. We will promptly provide OPAC with detailed information about our production units, subcontractors, or any locations where we produce, manage, or offer services for the Company.

We guarantee that no production of goods or services for OPAC takes place in locations or under conditions that conflict with the principles of this Code of Ethics.

Date	
	Stamp and Name of the Company
	Signature

## Commitment to the Code of Ethics - COLLABORATORS

The Code of Ethics defines the foundamental principles of conduct for OPAC S.r.l. and all its stakeholders. In order to foster a corporate culture based on fairness, transparency, and legality, OPAC requires employees, collaborators, and all those acting in the name or on behalf of the Company to sign this commitment declaration, being aware that failure to comply with the Code of Ethics may result in disciplinary measures, including the termination of the collaboration or employment contract.

#### For all collaborators:

I hereby confirm that I have reviewed the Code of Ethics of OPAC S.r.l. and will behave in line with its provisions. I commit to promoting an inclusive and respectful work environment, fostering the well-being of every individual, and ensuring equal opportunities in all professional relationships. I commit to opposing any form of discrimination or abuse and to complying with current regulations.

I also assume the responsibility for informing external parties with whom I interact in the course of my work about the existence and content of the Code of Ethics, requesting compliance with the same rules.

I acknowledge that the person designated by OPAC S.r.l. as the oversight body is the Head of Human Resources.

I am aware that non compliance with the Code of Ethics and the aforementioned commitments, on my part, may result in disciplinary measures, including the termination of the collaboration or employment contract, in addition to compensation for damages and the protection of the Company's rights in all competent venues.

Date	
	Stamp and Name of the Company
	Cian atoms
	Signature