



## CODE OF ETHICS SGARZI PACKING srl



SGARZI PACKING S.R.L.

via emilia, 41/s - 40011 - anzola dell'emilia (bo) - italy - tel. +39 051 734 886 - fax +39 051 734 100  
c.f. - iscr. reg. imp. bologna: n° 02544690379 - cap soc.: € 50.000,00 int. vers. - p. iva 00588151209

[www.sgarzi.it](http://www.sgarzi.it) - [info@sgarzi.it](mailto:info@sgarzi.it)



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## INTRODUCTION

### THE VISION OF SGARZI PACKING SRL

Sgarzi Packing srl is aware that the authority of a company is recognized not only by the competence of its collaborators and the high quality of the service provided to customers, but also by the attention paid to the needs of the entire community.

The principles that have always inspired the work of this Company are formally collected in an Ethical Code of Conduct in the belief that reliability is built day by day by respecting the rules and valuing people.

This Code of Ethics therefore represents a distinctive and identifying element towards the market and third parties, whose knowledge and sharing, required of all those who work in the Company or who collaborate with it, constitute the foundation of our business and the first step to contribute to the pursuit of our *vision*.

The goal of Sgarzi Packing srl is therefore to pursue excellence in the market in which it operates, through Sustainable Development, safeguarding the Environment and the safety of the people involved through the consistency of a behavior that respects the Social Ethics, obtaining the satisfaction and ensure added value for the Employee, for the Customer and, in general, for the Community.

Sgarzi Packing srl bases its code of ethics on the ***Universal Declaration of Human Rights*** approved ***by the General Assembly of the United Nations***, recognizing the rights and freedoms that are reported there. The commitment of Sgarzi Packing does not end with the recognition of these rights and freedoms, but intends to materialize with the action program for people, the planet and prosperity signed in September 2015 by the governments of the 193 UN member countries, better known as Agenda 2030.



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## PURPOSE AND RECIPIENTS

This Code of Ethics (hereinafter, the "**Code**") illustrates the set of ethical and moral principles that are the basis of the activity of Sgarzi Packing srl (hereinafter, the "**Company**") as well as the lines of conduct adopted by the Company both within its activities (in relations between employees) and externally (in relations with the institutions, neighbors, suppliers, customers, *partners* business, political and trade union organizations as well as the organs of communication (hereinafter the "**Stakeholder**").

Respect for these principles is of fundamental importance to achieve the corporate mission of Sgarzi Packing srl and to guarantee its reputation in the socio-economic context in which it operates.

Preliminarily it should be noted that Sgarzi Packing srl firmly believes that every activity must be carried out ethically, recognizing the principle enshrined in art. 41 of the Constitution, according to which private economic initiative "*cannot be carried out in contrast with social utility or in such a way as to damage security, freedom, human dignity.*"

This Code is binding for the directors and employees of Sgarzi Packing srl, as well as for all those who work and collaborate, on a permanent or fixed-term basis, on behalf of the Company (hereinafter, the "Recipients").

The Code will be widely disseminated within the internal governance structure, and broadly communicated externally, also through its website.

Sgarzi Packing srl also undertakes to adopt any further provision so that the principles and provisions of the Code can be promptly disclosed and applied.



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## GENERAL PRINCIPLES

The conduct of the Recipients, at all company levels, is based on the principles of legality, fairness, non-discrimination, confidentiality, diligence, and loyalty.

### Legality

Sgarzi Packing srl operates in full compliance with the law and this Code.

All Recipients are therefore required to observe all applicable legislation and to constantly update themselves on legislative developments.

The Company considers the transparency of financial statements and accounting to be a fundamental principle for the exercise of its business and for the protection of its reputation.

### Correctness

Correctness and moral integrity are an unfailing duty for all Recipients.

The Recipients are required not to establish any privileged relationship with third parties, which is the result of external solicitations aimed at obtaining improper advantages.

In carrying out their activities, the Recipients are required not to accept donations, favors or benefits of any kind (except for objects of modest value up to a maximum of € 50.00 ) and, in general, not to accept any counterpart in order to grant advantages to third parties improperly.

In turn, the Recipients must not make donations of money or goods to third parties or in any case offer unlawful benefits or favors of any kind (except for objects of modest value or commercial courtesy gifts authorized by the Company) in connection with their activity. lent for the benefit of Sgarzi Packing srl.

The intrinsic conviction of acting in the interest of the Company does not exempt the Recipients from the obligation to punctually observe the rules and principles of this Code.



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### Non Discrimination

In relations with Stakeholders and in particular in the selection and management of personnel, in the work organization, in the choice, selection and management of suppliers, as well as in relations with Bodies and Institutions, Sgarzi Packing srl avoids and repudiates any discrimination concerning the age, sex, race, sexual orientation, state of health, political and trade union opinions, religion, culture and nationality of its interlocutors.

At the same time, Sgarzi Packing srl favors integration, promoting intercultural dialogue, the protection of the rights of minorities and vulnerable individuals.

### Confidentiality

Sgarzi Packing srl undertakes to ensure the protection and confidentiality of the personal data of the Recipients and of the Stakeholders, in compliance with all applicable legislation on the protection of personal data.

Recipients are required not to use confidential information, learned as a result of their work, for purposes unrelated to the exercise of this activity, and in any case to always act in compliance with the confidentiality obligations assumed by Sgarzi Packing srl towards all Stakeholders.

In particular, the Recipients are required to maintain the utmost confidentiality on documents suitable for disclosing know-how, transport information, commercial information and corporate transactions.

### Diligence

The relationship between Sgarzi Packing srl and its employees is based on mutual trust: employees are therefore required to work to promote the interests of the company, in compliance with the values set out in this Code.

The Recipients must refrain from any activity that could constitute a conflict with the interests of Sgarzi Packing srl renouncing the pursuit of personal interests in conflict with the legitimate interests of the Company.

In cases where the possibility of the existence of a conflict of interest can be envisaged, the Recipients are required to contact, without delay, their hierarchical superior so that the company can evaluate, and possibly authorize, the potentially conflicting activity.



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In cases of violation, the Company will take all appropriate measures to put an end to the conflict of interest, reserving the right to act for its own protection.

### Loyalty

Sgarzi Packing srl and the Recipients undertake to create fair competition, in compliance with national and EU legislation, in the awareness that virtuous competition constitutes a healthy incentive for innovation and development processes and also protects the interests of consumers and the community.

### Designated person responsible for the implementation of human rights standards

Sgarzi Packing srl, in implementing its commitment to the actual dissemination and implementation of its code of ethics, has appointed an internal figure responsible for the implementation of the rules on human rights. The anonymous and transparent reporting system is also considered valid for any reports regarding violations of human rights, discrimination, *mobbing*, *burn-out* and other practices declared as illegitimate and unwanted within this Code of Ethics.



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## EMPLOYEE RELATIONS AND WITH EMPLOYEES

### Staff selection

The evaluation and selection of personnel are carried out according to fairness and transparency, respecting equal opportunities in order to combine the needs of Sgarzi Packing srl, with the professional profiles, ambitions and expectations of the candidates.

Sgarzi Packing srl undertakes to adopt all measures useful to avoid any form of favoritism in the personnel selection process using objective and merit-based criteria, respecting the dignity of the candidates as well as in the interest of the good performance of the company.

The personnel hired, also through the implementation of this Code, receives clear and correct information about the roles, responsibilities, rights and duties of the parties.

### Human Resource management

Sgarzi Packing srl protects and enhances its human resources, committing itself to maintaining constant the conditions necessary for the professional growth, knowledge and skills of each person, carrying out the appropriate training for professional updating and any initiative aimed at pursuing this purpose.

Without prejudice to the maximum availability towards the Company, no worker can be obliged to perform duties, services or favors not due based on their employment contract and their role within the company.

The Company is firmly committed to combating episodes of *mobbing*, *stalking*, psychological violence and any behavior that is discriminatory or harmful to the dignity of the person inside and outside the company premises.

Relations between employees must be carried out with loyalty, correctness and mutual respect, in compliance with the values of civil coexistence and people's freedom.

To better manage any unwelcome aspects of discrimination, the Company has appointed a member of the Company Management as responsible for social sustainability. This responsible figure, together with the Workers' Safety Representative, constitutes the Company's Social performance team, responsible for monitoring performance in terms of respect for the rights of workers and all other interested parties.



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## WORK ENVIRONMENT

Sgarzi Packing srl is committed to offering its staff a healthy, safe and respectful working environment for the dignity of workers.

Safety in the workplace is ensured both by rigorously implementing the provisions envisaged by the law in force, and by actively promoting the culture of safety through specific training programs. Staff training is a central element of the management system adopted.

Sgarzi Packing srl protects the health of its workers, also guaranteeing compliance with hygiene and health prevention regulations.

## BUSINESS MANAGEMENT

### Compliance with internal procedures

Sgarzi Packing srl believes that management efficiency and a culture of control are essential elements for achieving the objectives.

Recipients are required to strictly observe the procedures and instructions within the company.

Recipients must act on the basis of their respective authorization profiles and must keep all appropriate documentation to keep track of the actions taken on behalf of the company.

### Management Accounting

In the management accounting activity, the Recipients are called to act in compliance with the principles of truthfulness, accuracy and transparency, so that the reputation of Sgarzi Packing srl is protected both internally and externally.

Compliance with these principles also allows the company to plan its operating strategies based on its real economic and equity situation.

All the items reported in the accounts must therefore be supported by complete, clear and valid documentation, avoiding any form of omission, falsification and / or irregularity.



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In the case of equity or economic elements based on valuations and estimates, the relative recording must be based on criteria of reasonableness and prudence.

### Heritage protection

The Recipients exercise their functions trying to rationalize and contain the use of company resources.

Recipients are required to correctly apply the provisions relating to security to protect *hardware* devices from unauthorized access, which could seriously damage the rights to the protection of personal data of the staff and customers of Sgarzi Packing srl .

### Communication

Sgarzi Packing srl makes available suitable communication tools to the Interested parties through which they can interact with the company to forward requests, ask for clarifications or make complaints.

The information disclosed to the Stakeholders is complete and accurate so that the recipients can make correct and informed decisions.

The advertising promotion of Sgarzi Packing srl respects ethical values, protecting minors and repudiating vulgar or offensive messages.

### ENVIRONMENT

The production activities of Sgarzi Packing srl are managed in compliance with current environmental legislation. The Company undertakes to spread and consolidate a culture of environmental protection and pollution prevention among all its collaborators and subcontractors, developing awareness of risks and promoting responsible behavior by all collaborators.



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## RELATIONS WITH THE OUTSIDE

### Relations with Authorities and Public Administrations

Relations with the Authorities and with the Public Administration must be based on the utmost clarity, transparency and collaboration, in full compliance with the law and according to the highest moral and professional *standards*.

The Recipients, unless expressly authorized, cannot relate in the name and on behalf of Sgarzi Packing srl with the Authorities and with the Public Administration.

In relations with Public Officials, with Public Service Officers, and with the Public Administration in general, the authorized Recipients will comply with the highest levels of correctness and integrity, refraining from any form of pressure, explicit or veiled, aimed at obtaining any advantage. undue for himself or for Sgarzi Packing srl.

In this regard, the authorized Recipients will be required to strictly observe the provisions of this Code, as well as, more generally, the provisions of the directives issued by the *management* of Sgarzi Packing srl.

### Relations with the neighborhood and the local community

Sgarzi Packing srl has based relations with the neighborhood, which is made up of other companies, and with the local communities where its plants are located, in full compliance with the laws, both national and local, and in compliance with consortium and condominium regulations. , the Authorized Recipients land at the highest levels of correctness and integrity, refraining from any form of pressure, explicit or veiled, aimed at obtaining any undue advantage for themselves or for Sgarzi Packing srl.



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### Relations with political and trade union organizations

Sgarzi Packing srl does not favor or discriminate against any political or trade union organization.

The Company refrains from providing any undue contribution in any form to parties, trade unions or other social formations, except for specific exceptions and in any case always within the limits of what is allowed by the regulations in force.

Recipients are required to refrain from any direct, indirect or boasted pressure on politicians or trade union representatives.

### Relationship with customers and suppliers

The Recipients deal with third parties with courtesy, competence and professionalism, in the belief that their conduct depends on the protection of the image and reputation of the company and consequently the achievement of corporate objectives.

In particular, the Recipients must refrain from any form of unfair or deceptive behavior that could induce customers or suppliers to rely on unfounded facts or circumstances.

Recipients are required to commit themselves constantly to offer timely and high-quality services to customers, trying to limit any form of disservice or delay in order to maximize customer satisfaction.

Relations with suppliers are based on loyalty, correctness and transparency.

The choice of suppliers is made on the basis of objective criteria of economy, opportunity and efficiency.

The choice of suppliers on a purely subjective and personal basis or, in any case, by virtue of interests contrasting with those of the company is precluded.

The Recipients must put in place every possible control so that even suppliers and customers are able to comply with the fundamental ethical principles set out in this Code.



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## INTERNAL CONTROL SYSTEM

Compliance with the provisions of this Code is entrusted to the prudent, reasonable and careful supervision of each of the Recipients, within the context of their respective roles and functions within the company.

All Recipients are invited to report to their direct superiors the facts and circumstances potentially in conflict with the principles and provisions of this Code.

The *management* of Sgarzi Packing srl and the bodies responsible for this purpose take all necessary measures to put an end to the violations, being able to resort to any disciplinary measure in compliance with the law and workers' rights, including trade union rights.

## GUIDELINES THE SYSTEM OF SANCTIONS

Employees and external collaborators are required to comply with this Code of Ethics in all respects. Compliance with the rules of this Code of Ethics therefore constitutes an essential part of the contractual obligations of the employees (employees and collaborators) of Sgarzi Packing srl, pursuant to and for the purposes of Articles 2104 and 2106 of the Italian Civil Code. The violation of the provisions of this Code of Ethics by the employees (employees and collaborators) constitutes a breach of contractual obligations and may determine, depending on the case, the application of the sanctions and disciplinary measures provided for by the Collective Agreements applicable, termination of the relationship, compensation for damage. Sgarzi Packing srl will take the appropriate measures against those whose actions have resulted in violation of this Code of Ethics. Disciplinary measures may include, at the sole discretion of Sgarzi Packing srl, verbal or written warning, suspension or immediate termination of the employment or business relationship, or any other disciplinary measure deemed appropriate for the circumstances. Some violations of this Code of Ethics may also be prosecuted civilly or criminally by the administrative authorities or other authorities.

Sgarzi Packing srl

C.E.O.

