

CODE OF ETHICS

1. INTRODUCTION

ERREBI S.r.l. (hereinafter “ERREBI”) carries out the injection moulding of technical plastic components at its facility in Caerano San Marco (TV), Italy.

ERREBI’s mission is to manufacture technologically advanced and safe technical plastic components for various sectors, offering highly innovative solutions capable of driving market evolution, with customer needs and satisfaction always at the core.

The company’s activities are made possible through the contribution of internal staff, external consultants, and companies providing goods and services.

Awareness of these relationships and the resulting responsibilities, as well as safeguarding customer needs, are part of the company’s culture.

In recent years, attention has grown around promoting ethical conduct, culminating in this Code of Ethics, which outlines the fundamental principles and behavioural standards that directors, collaborators, suppliers and consultants commit to upholding.

1.1 REGULATORY REFERENCES

The applicable legal and regulatory references include:

- Articles 2094, 2103, 2104, 2105, 2106, 2118, 2119 of the Italian Civil Code;
- Article 7 of Law no. 300/1970 – Workers’ Statute;
- Law no. 604/1966 on individual dismissals;
- National Collective Bargaining Agreement for Rubber and Plastics;
- Legislative Decree no. 196/2003 – “Personal Data Protection Code” and subsequent updates;
- Legislative Decree no. 81/2008 – Health and Safety in the Workplace;
- United Nations 2030 Agenda;
- The 10 Principles of the UN Global Compact;
- ERREBI’s Sustainability Policy.

2. RECIPIENTS

This Code applies to employees, directors, consultants, customers, suppliers, agents, and any individual acting on behalf of ERREBI, and more generally, to all individuals with whom the company interacts during its operations (hereinafter referred to as the “Recipients”).

Recipients must understand and comply with the contents of this Code of Ethics.

3. COMPANY VALUES

- ✓ **Trust:** The company has always believed in building relationships with clients and collaborators based on mutual trust.
- ✓ **Solidarity:** The company pays attention to the needs of its employees with the goal of fostering a positive and stimulating working environment.

- ✓ **Inclusion:** The company values the coexistence of individuals from different communities, thereby promoting integration.
- ✓ **Reliability and Quality:** The company has chosen to certify its processes in order to be increasingly reliable in the market.
- ✓ **Environment:** In the last two years, the company has developed new environmental awareness, obtaining ISO 14001 certification.

4. ETHICAL PRINCIPLES

4.1 INTEGRITY AND COMPLIANCE WITH LAWS AND REGULATIONS

ERREBI operates in strict compliance with the law and ensures that all personnel act accordingly: individuals must behave lawfully, regardless of the context, the activity performed, or the location.

Everyone is expected to act with integrity, transparency, consistency, and fairness in all business relationships.

This commitment also extends to consultants, suppliers, customers, and anyone having a relationship with the company.

4.2 INCLUSION AND REJECTION OF DISCRIMINATION

ERREBI avoids all discrimination based on age, gender, sexual orientation, health status, race, nationality, political views, or religious beliefs in decisions that impact stakeholder relationships, particularly in managing personnel, supplier selection, community engagement, and interactions with public institutions.

4.3 PEOPLE-CENTRIC APPROACH AND HUMAN RESOURCE DEVELOPMENT

ERREBI recognises the central role of its human resources, viewing them as a key factor in business success and acknowledging that each individual's work contributes to both business and personal development.

Dialogue, professional growth, identity, a sense of belonging, and a healthy, safe, and fulfilling workplace are at the heart of the company's daily operations.

4.4 TRANSPARENCY, BUSINESS ETHICS, AND ANTI-CORRUPTION

Integrity and responsible business conduct are the foundation of ERREBI's operations, which are based on the principles of:

- ✓ **Reliability**, meaning commitment and seriousness in projects and obligations;
- ✓ **Economic stability**, demonstrated through the company's long-standing activity;
- ✓ **Transparency** in management to ensure the accuracy and truthfulness of information shared internally, with stakeholders, and the broader community;
- ✓ **Fair contractual conduct**, avoiding discrimination and conflicts of interest;
- ✓ **Protection of competition**, avoiding collusive, predatory, or abusive behaviours.

4.5 QUALITY AND ENVIRONMENT

ERREBI is committed to ensuring quality across all its activities.

The company has an ISO 9001-certified Quality Management System, ensuring consistent process quality both internally and externally.

ERREBI also manages its activities with a continuous improvement approach concerning environmental respect and stakeholder health, in line with ISO 14001 standards.

5. RULES OF CONDUCT

5.1 GIFTS AND COURTESIES

In dealings with clients, suppliers, and third parties (e.g. national or international public institutions), it is forbidden to offer or accept money, gifts, or benefits (even personally) to obtain any undue advantage.

Business courtesies are allowed if of modest value and if they do not compromise integrity, reputation, or the recipient's independent judgement.

Any form of corruption, whether with private or public parties, is strictly prohibited.

5.2 EMPLOYEES

Each employee must carry out their duties with diligence, efficiency, and integrity, making the best use of time and resources and taking responsibility for assigned tasks.

Everyone must share and uphold company policies, always protecting ERREBI's interests and reputation.

Honesty and loyalty are fundamental values, and no pursuit of company interest can justify dishonest conduct.

Personnel must not:

- ✓ Use information, assets, or equipment for personal purposes;
- ✓ Accept or apply undue pressure or recommendations that could harm the company;
- ✓ Accept improper offers of money or benefits.

Confidentiality must be maintained regarding company data and operations. Both tangible assets (e.g. equipment, vehicles, buildings) and intangible assets (e.g. know-how, databases) are considered company property.

Employees must avoid any real or potential conflicts of interest.

The work environment should promote a sense of belonging, with courteous and collaborative behaviour.

Each employee is responsible for the cleanliness and care of their workspace.

IT tools are strictly for professional use, and only authorised software may be installed.

5.3 CUSTOMERS

ERREBI provides services without discrimination, respecting regulations and rejecting unfair or deceptive practices.

Customer relationships should aim to build trust based on fairness, honesty, efficiency, and professionalism.

The company rejects business with parties who act unlawfully and collaborates with authorities where necessary.

5.4 SUPPLIERS

Relationships with suppliers must be based on fairness and impartiality.

Partner selection and purchasing terms must be based on quality, price, availability, and service reliability.

ERREBI does not seek personal gain and avoids working with suppliers involved in criminal proceedings.

5.5 PUBLIC ADMINISTRATION, INSTITUTIONS AND JUSTICE

Relationships with public authorities must be transparent, honest, and legally compliant.

It is forbidden to offer gifts to public officials or their relatives to influence decisions. ERREBI respects the administration of justice and collaborates with authorities and public officials when required.

Only authorised functions may handle institutional relationships.

5.6 ACCURATE ACCOUNTING

ERREBI's accounting records must be accurate, truthful, and complete, following applicable laws and generally accepted accounting principles.

Employees must be honest and objective in maintaining records.

Unrecorded or secret transactions are prohibited.

No employee may obstruct audits or inspections by the relevant authorities.

6. IMPLEMENTATION, SAFEGUARDS, AND REPORTING VIOLATIONS

The responsibility for ensuring compliance with this Code, promoting ethical principles, and clarifying doubts lies with company management.

Anyone aware of behaviour that may violate this Code or the law is encouraged to report it—anonymously if preferred—via post to ERREBI S.r.l., Via Padova 103, 31031 Caerano San Marco (TV), or via email to info@errebimp.com.

Compliance with the Code is considered a contractual obligation under Article 2104 of the Italian Civil Code.

Sanctions for violations will align with applicable laws and national labour contracts and will be proportionate to the violation.

If the relationship of trust is compromised, further measures will be taken in accordance with legal and contractual provisions.

7. COMMUNICATION AND DISSEMINATION

This Code of Ethics has been distributed to all employees and is available on the company website: <https://www.errebimp.com>.

The management also promotes initiatives to share its contents with relevant stakeholders.