

Codice Etico Selematic Group

Since 1978, Selematic S.p.A. has been offering cutting-edge solutions in the field of secondary packaging system design and manufacturing, as well as end-of-line solutions.

A history marked by passion and respect for work which, over more than four decades, has given rise to a company constantly focused on excellence in production processes, eco-sustainability and worker protection.

In 2024, with the acquisition by Selematic S.p.A. of 100% of the capital of Miele S.p.A. – a company specializing in the production of primary packaging systems – the concept of production integration and values, both new and already shared, was further consolidated with the creation of a group and new brand: Selematic Group.

Continuity with an evolutionary approach, built on solid foundations, with an eye always on the present and the future.

Introduction

Ethics are the set of rules and principles that society considers positive and is applied to everyday life. For Selematic Group, it represents an essential asset that uniquely guides corporate decisions, both in internal relations and in relations with customers, suppliers and institutions. This Code brings together the principles and values we believe in, describes how we operate and is the tool we use to communicate the essence of our work.

The company has adopted its own Organization, Management and Control Model in accordance with Legislative Decree 231/2001, and this Code of Ethics is an integral part of it in terms of principles and expected behavior.

Recipients of the Code of Ethics

The Code applies to all company representatives (directors, auditors, managers, employees) as well as consultants, external collaborators and suppliers. Specific contractual clauses are provided for suppliers, critical subcontractors, consultants and partners, including the right of audit and express termination in the event of material violations.

Anyone who has dealings with the company in any capacity is required to comply with industry regulations and the principles of the Code. Selematic Group requires compliance with the Code in all economic relations and ensures its maximum dissemination, making it available to all parties and providing a copy to employees.

Effectiveness of the Code

The conduct required by the Code supplements, on an ethical level, the obligations of loyalty and diligence incumbent upon managers, supervisors and employees, as well as

the duty of good faith required of collaborators and suppliers. Violations, where applicable, are punishable by civil, criminal and disciplinary sanctions.

Implementation and updating of the Code

The Code is adopted by resolution of the Board of Directors and is subject to amendments and additions. It is subject to annual review or review on an ad hoc basis in the event of regulatory or organizational changes. The Supervisory Body proposes updates to the Board of Directors, monitors their implementation and reports on them in an annual report

General ethical principles

Selematic Group strives for excellence in its processes and services, respecting its values and human dignity, with a focus on environmental, social and governance issues. The principles that inspire our work are: legality, transparency, fairness, efficiency, sustainability, collaboration, professional development and fair competition.

Legality

Legality is the foundation of the company's actions. Selematic Group ensures compliance with Italian and European regulations, as well as with the laws of the countries involved in its activities, refraining from practices that would conflict with Italian or European Union law. Employees, collaborators, consultants, suppliers and customers must comply with all applicable laws and regulations.

Transparency

Transparency is based on honesty, clarity and completeness of information, both internal and external. Communication—both verbal and written—must be clear, understandable and verified. We ensure equal conditions and accurate information for our customers and in our contracts.

Fairness

The principle of fairness requires fair behaviour and respect for the rights of each individual, in addition to compliance with rules and contractual obligations, including full protection of privacy. Discrimination is prohibited, and conflicts of interest between the company and those acting on its behalf are prevented and sanctioned.

Rejection of all forms of discrimination

In the management of personnel, supplier selection and relations with the community and institutions, we prohibit any discrimination based on age, gender, sexual orientation, health, nationality, political opinions or religious beliefs. We do not tolerate forced labour, abuse, illegal hiring or child exploitation. We promote respect for human rights, equality and fair relations in a peaceful and inclusive working environment.

Centrality, development and enhancement of Human Resources

We consider people to be a fundamental asset. We offer a healthy and collaborative environment, we value skills and commitment, we guarantee equal opportunities, and we select on the basis of transparency, competence and merit, discouraging any favoritism.

The recipients of the Code act responsibly, taking responsibility for the consequences of their actions.

Quality and safety

We guarantee the quality and safety of our processes by qualifying suppliers, ensuring the traceability of supplies and maintaining up-to-date certificates. We train our employees in hygiene, quality and food safety, monitor the application of procedures and promote innovation throughout the entire supply chain.

Solidity and innovation

Improving organizational effectiveness is an ongoing priority: we allocate resources to advanced technologies and research and development programmes, supported by a team of specialists.

Fair competition practices

We recognize the importance of a free and competitive market. Those who work for Selematic Group act fairly in accordance with national and EU regulations, respecting competitors and rejecting unfair practices or anti-competitive agreements. We protect our own and others' intellectual property and take measures to prevent illegal commercial practices. Activities must be traceable and correctly represented in the financial statements on a truthful and verifiable basis.

Selection of raw materials

We have a qualification process for suppliers—both direct and subcontractors—that involves operational, informational, control, evaluation and decision-making activities.

Qualified suppliers are monitored to ensure product requirements and compliance with quality and safety standards.

Protecting the environment

We combine growth and profitability with environmentally friendly policies, promoting prevention of pollution, correct waste management and recovery and/or recycling projects. We promote water and energy saving and invest in solutions with a lower impact, optimizing logistics and building construction criteria.

The social players and criteria of conduct

External relations

In our external relations, we maintain integrity, fairness and correct behavior with all stakeholders in order to consolidate their trust and loyalty. We only collaborate with serious and reliable counterparts, excluding those involved in illegal activities. We require conduct consistent with the values of the Code.

Suppliers

Relationships with suppliers are based on responsible cooperation, strict compliance with the rules and principles of the Code, professional excellence and effective safeguards to protect health, safety and the environment throughout the entire supply chain.

Suppliers' selection

Our supplier selection process is structured and documented: we use clear and up-to-date qualification criteria and conduct the selection process in a manner that ensures transparency, fair competition and equal access.

Decisions are based on a set of criteria that includes economic competitiveness, quality and usefulness of the proposed solutions, price, technical and organizational soundness, 231/ESG integrity requirements, and complete supply chain traceability. If there are any risk indicators, we carry out checks on UBOs and sanctions lists.

The inclusion and retention in the Supplier Register require strict ethical and legal requirements: we do not collaborate with anyone responsible for violations of fundamental rights and we demand compliance with regulations, the Code of Ethics, internal standards, and policies, as proven by appropriate documentary evidence.

Transparency and integrity

Relationships with suppliers are governed by internal procedures and the Code, including financial contracts and consulting agreements, in compliance with regulations. Contracts must be based on clear relationships and must not create improper dependencies.

Due diligence of suppliers and partners

For suppliers and partners, we adopt a structured qualification policy that assesses the Ultimate Beneficial Owner (UBO), the territorial context in which the operator operates, economic, fiscal, and financial profiles, the existence of internal policies and organizational models, as well as performance KPIs (timing, quality, compliance, complaints). We complete the analysis by verifying the required administrative and authorization documentation (e.g., environmental, safety, anti-mafia).

Anti-corruption and Decree no.23-2001

Personnel policies

Human resources

We promote collaborative communities based on the principles of contributing to the common good and the company. We value meritocracy, quality of work, and personal dignity, guaranteeing freedom of association and collective bargaining.

Employee responsibilities

All employees must be familiar with the Code and relevant regulations and refrain from any conduct that contravenes them. Employees are required to seek clarification from their superiors and report any violations or unlawful requests, while ensuring the confidentiality of the whistleblower. Managers and supervisors must prevent retaliation.

Duties of managers

Managers comply with the regulations and the Code and monitor their application by employees through appropriate and periodic checks. They cooperate fully with internal audits and with administrative or judicial authorities when requested.

Duties of department heads

Department heads—as identified in the organizational chart, job descriptions, and delegation system—are responsible for ensuring compliance with the Code, promoting

awareness among employees that its provisions are an integral part of their work, and promptly reporting any critical issues, requests, or reports received to the Board of Directors/CEO. Failure to comply may result in disciplinary action.

Selection and recruitment

We recognize that our staff plays a central role. Recruitment and collaboration are carried out in accordance with equal opportunities and objective criteria, merit, and competence, involving department managers. We avoid favoritism, nepotism, and cronyism: those involved in the selection process declare any family ties and abstain from the process itself. Irregular work and all forms of exploitation are strictly prohibited.

Training

We invest in professional development with refresher courses and training aimed at improving skills and results, ensuring equal opportunities for growth and assessments consistent with objectives.

Protection of individuals

We place the utmost importance on safeguarding the dignity and moral integrity of each individual. Harassment, offensive behavior, and language, as well as any form of discrimination, are expressly prohibited. We guarantee protection to whistleblowers who report serious offenses pursuant to Legislative Decree 231/2001, in full compliance with the whistleblowing procedure.

Information management

Compliance with information security policies is everyone's responsibility. To ensure data integrity, confidentiality and availability, documents must be drafted in a clear, complete and verifiable manner.

Privacy protection complies with current legislation: the dissemination of data without consent is prohibited, except in cases provided by law. It is mandatory to maintain the utmost confidentiality regarding company information.

Protection of information

Company and third-party information are processed only by authorized people and for work purposes. Contracts include ethical clauses and NDAs where necessary. Any information incidents must be reported immediately; violation of these obligations will result in disciplinary or contractual measures.

Conflict of interest

Any situation involving a conflict of interest must be prevented and employees must refrain from taking advantage of opportunities known to them due to their role. Examples include: personal or family financial interests with suppliers, customers or competitors; acceptance of money, gifts or favours. Any conflicts, even if only potential, must be reported promptly to the employee's manager.

Use of company assets

Company assets, both tangible and intangible (strategies, customer lists, personnel data, marketing plans, organizational charts, pricing policies, financial and accounting data) must be protected and used diligently, in accordance with procedures. Private or

improper use is prohibited. In the IT field, it is mandatory to use systems for business purposes, comply with security policies, avoid offensive messages and not access inappropriate websites or social networks without authorization.

Confidential information

Information relating to the Company constitutes assets that must be protected. Recipients must refrain from disclosing, either within or outside the Selematic Group, any confidential information learned in the course of their duties, in compliance with laws and internal procedures.

Health and safety

We guarantee healthy and safe environments, promoting a culture of prevention with structured risk management systems. Everyone must comply with rules and procedures and report any critical issues.

We adopt the general measures provided for by Legislative Decree 81/2008 and subsequent amendments and additions, defining operating procedures, risk assessment documents, training and regulatory monitoring. The use of alcohol, drugs or substances with similar effects is prohibited.

Privacy protection

We treat the personal data of employees and collaborators with the utmost confidentiality, in accordance with Regulation (EU) 679/2016 and national legislation, collecting and storing data diligently and with prior consent when required. Investigations into ideas and private life are prohibited. The same precautions apply to the electronic management of data.

Institutional relations

Public Administration

Public Administration (PA) refers to any public body or entity, as well as anyone responsible for public services, at national or international level. Relations with the PA are based on fairness, transparency and honesty: it is forbidden to unduly influence decisions or engage in unlawful conduct (offers of money or other benefits). Corrupt practices, gifts of more than modest value or promises of advantages are not permitted.

In public tenders, we operate in full compliance with the law and best practices. It is prohibited to be represented by consultants with conflicts of interest or to establish working/consultancy relationships with former civil servants outside of standard procedures. Public contributions and funding must be used exclusively for the purposes for which they were granted; false or misleading documents or statements are prohibited. All contact with the public administration is handled by authorized departments, with segregation of duties, minutes/evidence and storage in accordance with document policies.

All communication with the public administration must be authorized and traceable; any violations or attempts must be reported promptly to the Supervisory Body and the relevant departments.

Financial institutions

Our relationships with financial intermediaries are based on fairness, transparency and responsibility. When selecting partners, we favour those with a solid reputation, operational reliability and a clear alignment with our values.

We require clarity in economic conditions, traceability of transactions, compliance with industry regulations (including anti-money laundering) and standards of integrity and ESG consistent with our commitments.

Integrity in B2B relationships (anti-corruption between private individuals)

It is forbidden to offer, promise, give, solicit or accept money, gifts, hospitality, discounts or other benefits in order to obtain or maintain business. Gifts and hospitality are only permitted if they are modest, proportionate and in accordance with internal policies and thresholds; initiatives exceeding the threshold require prior authorization.

Donations, sponsorships and gifts

Gifts and sponsorships are only permitted if they are consistent with corporate values and do not have any distorting effects. Contributions to individuals connected to public officials or counterparties involved in ongoing negotiations/tenders, to entities that lack transparency regarding their UBO (ultimate beneficial owner) or have serious reputational issues, as well as cash payments, payments through unauthorized intermediaries or payments to individuals other than the beneficiary are prohibited.

All initiatives require due diligence assessments, prior authorization and traceability of transactions. The Company applies specific anti-corruption and anti-money laundering policies and provides internal reporting channels.

Accounting and financial reporting

Transparency in accounting

Transparency in accounting requires true, accurate and complete information. Every management event must be represented correctly and promptly. For each transaction, adequate documentation must be kept for recording, identifying responsibilities and reconstructing the process.

Records must accurately reflect the supporting documents. Omissions, falsifications or negligence must be reported to the superior or the Supervisory Body. We apply principles of segregation of duties for the correct allocation of responsibilities in financial areas.

Controls and checks

We guarantee the audit and control bodies access to information and documents, with the full cooperation of directors and employees. Documents and records are kept in accordance with the law and internal policies; internal control carries out periodic checks; the Supervisory Board receives information flows and may request evidence at any time.

Whistleblowing, Methods of implementation and control of the Code of Ethics

Methods of implementation and control of the Code of Ethics

Managers and department heads

Following the adoption of the Code, executives and department heads promote its values, raise awareness of ethical issues, support the application of the criteria of conduct, periodically verify the degree of implementation, develop and disseminate appropriate procedures, ascertain any violations and propose the sanctions provided for in the contracts, and report regularly to the Board of Directors, making proposals for revision where necessary.

Relations with internal control bodies

Managers and supervisors collaborate with the Supervisory Body established pursuant to Legislative Decree 231/01, promptly reporting any violations of the Code.

Violation of the Code of Ethics

All interested parties, both internal and external, shall report any non-compliance in writing to the Board of Directors and the Supervisory Board, in accordance with the

procedures laid down. The Supervisory Board shall protect whistleblowers against retaliation and shall keep their identity confidential, except where required by law.

Consequent disciplinary measures

Violation of the principles of the Code, when constituting a disciplinary offence, shall result in the immediate initiation of proceedings, regardless of any criminal proceedings. For managers, the measures provided for in the National Collective Labour Agreement shall apply. Collaboration and supply contracts shall include express termination clauses in the event of conduct contrary to the Code.

Violations related to Legislative Decree 231/01

The ethical principles relevant to the prevention of offences under Legislative Decree 231/01 are an essential part of preventive control. The rules of conduct set out in the Code are a reference point for recipients in their relations with other parties.

Dissemination, communication and training

Training on the Code and 231 risks is mandatory. The Company adopts an annual plan based on role and risk (new hires; annual refresher courses; advanced modules for at-risk functions; information sessions for critical suppliers/partners with acknowledgement of the Code).

Activities are tracked (attendance, tests, certifications) and effectiveness is monitored (coverage, outcomes, audit closure).

The Supervisory Board receives reports at least annually. Unjustified non-participation is handled in accordance with the disciplinary system and contracts. In commercial and assignment relationships with third parties, clauses and declarations are provided to

formalize the commitment to comply with the Code and regulate penalties in the event of violations.

Whistleblowing (D.Lgs. 24/2023)

The whistleblowing protection framework was established by Law 179/2017 (which amended Article 6 of Legislative Decree 231/2001) and was updated by Legislative Decree 24/2023, implementing Directive (EU) 2019/1937.

Our system guarantees confidentiality of identity and content, the possibility of anonymous reports, prohibition of retaliation and management of reports by the Supervisory Body or designated people. The Supervisory Body sends an acknowledgement of receipt within 7 days and a response within 3 months; all stages are tracked in confidential registers with secure data storage, in compliance with privacy regulations. Employees, senior managers, collaborators, consultants, agents and suppliers can report violations of the law, Model 231 and the Code of Ethics (including corruption between private individuals, fraud, predicate offences, serious violations in the areas of health/safety, the environment, privacy and competition).

Complaints of a purely personal nature, which are not relevant to the public interest or the organizational structure, are excluded from the scope of whistleblowing; such complaints should be addressed to HR channels. Instructions and channels are published on the intranet/website and in the information notices. The Company uses a dedicated platform, compliant with Legislative Decree 24/2023 and Article 6 of Legislative Decree 231/2001, which ensures confidentiality, anonymity and full traceability.

Supervisory Body

After adopting the Model of Organization, Management and Control, (MOGC) pursuant to Legislative Decree 231/2001, the Company established a Supervisory Body (SB), which is responsible for supervising the prevention of offences and compliance with ethical principles. The SB operates autonomously and independently, with a dedicated budget and full access to documents, premises and systems.

It has adequate powers of inspection to ensure the implementation and updating of the MOGC and the Code. Its functions include: monitoring compliance with the MOGC and the Code; proposing updates; carrying out checks and controls with quarterly reports and an annual report, also with internal or external professional support; promoting sanctions where necessary; managing reports (taken on within 7 days, responded to within 90 days), ensuring confidentiality and timeliness.

Function managers and operational representatives must cooperate with the SB, monitor the application of the Code by employees and report violations or anomalies. The SB is an essential safeguard for legality and proper management, protecting the integrity of the company, its assets, reputation and founding values.