



POLYTRADE
BEYOND POLYMERS

CODE OF ETHICS OF POLYTRADE SpA

2nd August 2021

POLYTRADE SpA

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CHAPTER I GENERAL PRINCIPLES

1. INTRODUCTION

POLYTRADE SPA is a company that essentially performs the activity of distribution of thermoplastic polymers, and makes use of a network consisting of 6 owned regional warehouses, located in the most important industrial areas: Montemurlo (PO), Carpiano (MI), Martellago (VE), Leinì (TO), Civitanova Marche (MC) and Arzano (NA). The range of products distributed is attributable to the most well-known international companies in the sector and includes the main commodities as well as a wide range of technopolymers (raw materials used for extrusion and blow molding, locking systems, cars, housewares, furniture and general uses).

The Company aims to develop, strengthen and maintain a relationship based on trust with all those categories of individuals, groups or institutions whose contribution is required to perform its business.

Therefore, in order for the activity to be carried out correctly, it is necessary that all the afore-mentioned categories operate optimally by placing their cultural, operational, technical and ethical resources at the Company's disposal.

The Company has therefore deemed it appropriate to define the set of values and principles recognised, accepted and shared by it, as well as the set of rules and criteria of conduct that form the basis of its business.

The set of these principles and rules is contained in this Code of Ethics, of which the Company expects the spontaneous sharing, adherence and dissemination, as well as compliance by all those persons who act in the name and on behalf of the Company itself and who are in any way in contact



with it, also by virtue of the contractual relationships in place with any tenants and collaborators of the same.

2. DESCRIPTION OF THE CODE

The Code defines the principles and models of conduct of the Company's business as well as the commitments and responsibilities of collaborators.

The fundamental and mandatory principle governing all the Company's activities is represented by full compliance with the laws and regulations in force in the Italian State and with the rules of the European Union, as well as with the territories, countries and foreign states with which the Company operates. With regard to activities carried out abroad, the Company is required to prohibit conducts and behaviours that, although lawful according to the provisions of the country in question, are in contrast with the laws and regulations of the Italian Republic and/or with the rules of the European Union.

The Company also acts in full compliance with the laws and regulations in force, with transparency, correctness and with professional commitment in order to develop its value for the benefit of the shareholders as well as in order to support the professional growth of its human resources.

In relation to the above, this Code provides information regarding the solution of ethical and commercial problems. In particular, the pursuit of the interest of the Company does not justify the adoption of behaviours in contrast with these principles, as well as with the laws and regulations in force.



Lastly, the same Code provides exemplary and non-exhaustive indications of behaviour with which all employees, collaborators, or simply those persons present, even indirectly, in the company perimeter or in the commercial area of the same, must comply.

All actions, operations and transactions referable to the Company's business must be undertaken and pursued in full compliance with legality, impartiality and the principles of fair competition; they must be handled with the utmost correctness; they must be inspired by the completeness and transparency of information and must also be supported by documentary evidence. Relations with the Authorities must be based on maximum transparency and collaboration, in full compliance with their institutional functions.

3. GENERAL PRINCIPLES

A) NON-DISCRIMINATION

As part of its internal relations and in relations with all third parties, the Company avoids any discrimination based on age, sex, racial and ethnic origin, nationality, state of health, political opinions and religious beliefs of its interlocutors.

B) PROBITY

As part of their professional activity, every employee, consultant, collaborator, supplier, customer of the Company, and anyone who has relations with it, must diligently comply with the laws and regulations in force, with the national, European and international sector regulations and



with the Code of Ethics and internal regulations, which must be known and understood as far as possible.

In no case can the pursuit of the Company's interest justify non-compliance with these laws and regulations.

C) CORPORATE COMMUNICATION

The Company considers it a fundamental duty to ensure that communication, both inside and outside the Company, is accurate and truthful, despite the undeniable requirements of confidentiality and caution that characterise its business. Communications, if made, must therefore be such as to avoid misleading situations that could produce liability or damage of any kind.

D) TRANSPARENCY AND COMPLETENESS OF INFORMATION

The collaborators, employees and consultants of the Company are required to provide complete, transparent, understandable and accurate information in such a way as to allow the Company itself to make autonomous and informed decisions of the interests involved, of the alternatives and of the relevant consequences.

In particular in the formulation of any contracts the Company ensures it specifies to the contracting party, in a clear and understandable manner, the conduct to be followed in all the envisaged circumstances.

E) VALUING AND HOLDING TO ACCOUNT OF HUMAN RESOURCES

The Company guarantees an adequate degree of professionalism in the execution of the tasks assigned to its employees, consultants and

collaborators. The management and valuing of human resources is based on respect for the personality, competence and professionalism of each of these in the general context of the Company.

Each person must carry out their work and perform their services with diligence, efficiency and fairness, making the best use of the tools and the time made available to them, at the same time assuming the responsibilities related to the required obligations. All employees of the Company, even indirect ones, must comply with the common rules of conduct, wear clothing that is appropriate to the places and tasks assigned and refrain from implementing attitudes that are in contrast with any precept of religious faith.

F) DUTIES OF COLLABORATORS

The Company expects from its collaborators, in carrying out their duties, ethically unexceptionable, as well as legally and professionally correct behaviour, aimed at strengthening mutual trust and consolidating the image of the Company.

Therefore, collaborators are required to:

1. operate with probity and integrity in the relationships between each other, with the Company's shareholders, with competing companies, with customers and, in general, with third parties;
2. observe the legal provisions of the legal system in which the Company works;
3. avoid conflicts of interest with the Company and, in any case, harmful behaviours that could result in negative publicity for the same;
4. act with objectivity and balance with a view to enhancing and empowering their own employees and collaborators;

5. pay attention to the individual characteristics of employees and collaborators and promote the development of potential and talent, recognising the value of the collaboration and innovation initiative;
6. make every effort to ensure that no situations of hardship, prejudice, denigration or discrimination occur within the work environment;
7. promote relationships between employees and collaborators based on the values of loyalty, fairness, mutual respect and good education;
8. avoid situations that require employees and collaborators to act against the Code of Ethics or against the law;
9. ensure that employees carry out their work in safe and healthy conditions in compliance with the provisions of the applicable laws in force.

G) CORRECTNESS IN THE EVENT OF POTENTIAL CONFLICTS OF INTEREST

The Company's employees, collaborators and consultants pursue the objectives and general interests of the Company in carrying out their activities and/or duties. Therefore, in the conduct of any activity and/or assignment, situations must be avoided where the subjects involved are, or may even appear to be, in a conflict of interest. The hypotheses of "*Conflict of interest*", in addition to those defined by law, also include the case in which an employee, collaborator or consultant operates in the context of their activity and/or assignment for the satisfaction of an interest other than that of the company and of its shareholders or takes personal advantage from business opportunities intended for the company.

In this perspective, employees, collaborators and consultants are required to avoid any situation and refrain from any activity that could

represent a personal interest against that of the Company or that could interfere with or hinder the ability to make decisions in an impartial and objective manner, in the interest of the Company itself. Employees, collaborators and consultants must therefore exclude any possibility of overlapping or in any case crossing, by exploiting their own functional position, the economic activities that correspond to a logic of personal and/or family interest and the duties they cover within the Company. Any situation of conflict of interest, even indirect or potential, must be promptly reported to the relevant bodies (e.g. Supervisory Body, Legal Representative of the Company, etc.) so that its existence and severity can be assessed and the consequent effects can be excluded or mitigated.

H) CONFIDENTIALITY AND PROHIBITION OF MISUSE OF CONFIDENTIAL INFORMATION

The Company guarantees, in compliance with the provisions of the law, the confidentiality of the information in its possession. Employees, collaborators and consultants of the Company are expressly prohibited from using for purposes not related to the exercise of their business and/or from disclosing unduly confidential information.

It is also expressly forbidden to use or to communicate to others, without a justified reason and/ or indication from the Company, information that is confidential or internal of the Company itself.

I) PROTECTION OF HEALTH

Employees, collaborators and consultants of the Company, whose physical and moral integrity is considered a primary value, are guaranteed working conditions that respect individual dignity, in safe and healthy work environments.



The Company considers the principle of health protection as a primary objective, in line with the business activity and the economic initiatives that derive from it.

The Company considers the full and complete compliance with the legislation on safety and hygiene at work to be of fundamental importance, and actively works for the prevention of accidents at work and for the safety and hygiene of workers.

L) WORKER PROTECTION

The Company considers the principle of worker protection as a primary value. The Company denies and opposes the exploitation of minors and the exploitation of the worker in general.

Each employee or collaborator of the Company, as part of their role, undertakes to promote a work environment that is free from prejudices, respecting the personality and safety of workers and actively collaborates to maintain an internal climate that guarantees respect for dignity and for the health of all.

Relations between the employees of the Company are based on values of civil coexistence and are carried out in compliance with the rights and freedoms of persons and the fundamental principles that affirm equal social dignity without discrimination for reasons of sex, race, language, nationality, religious creed, political and trade union membership, physical or psychological conditions.

Relations between employees, regardless of the levels of responsibility, must be based on the values of loyalty, fairness and mutual respect.

Each area executive and/or manager must exercise their powers with objectivity and balance, with a view to enhancing and empowering their

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employees and collaborators. Each employee must be cooperative and perform their duties with responsibility, efficiency and diligence.

M) PROTECTION OF SAFETY AT WORK

The Company considers the principle of occupational health and safety protection as a primary value.

In carrying out every work activity, the Company works to avoid the risks of accidents at work and to evaluate and eliminate the risks that cannot be avoided, after intervening on the working conditions, based on the current technical evolution, and implementing the programming of a system of accident and incident prevention.

N) TRANSPARENCY AND RECORDING OF FINANCIAL ACTIONS AND MOVEMENTS

Each operation and transaction must be correctly recorded, authorised, verifiable, legitimate, coherent and congruous, as well as verifiable through paper and/or electronic medium with indication, where possible, of the relative author.

All actions and operations of the Company must have adequate recording and documentary support and it must be possible to verify the decision-making, authorisation, carrying out, recording and verification process.

Any movement of money must be correctly accounted for and documented.



CHAPTER II

SCOPE

1. RECIPIENTS OF THE CODE OF ETHICS

The Code applies to all shareholders, collaborators, employees, consultants and to all other subjects or companies acting on behalf of the same, even indirectly, who are therefore committed to observing and enforcing the content of this Code of Ethics in the scope of their functions and responsibilities, as well as on the occasion of the performing of their professional activity.

All the afore-mentioned subjects undertake to respect the Code at the time of taking up the assignment and to maintain a conduct that is inspired by the principles of loyalty, impartiality, integrity and honesty. They engage to avoid any act or behaviour that violates or could lead to believe that the provisions of the law or regulations or those contained in the Code have been violated.

Relations between the Company and employees are based on trust and collaboration.

The employee engages to ensure that relations with colleagues are based on harmony and avoids acts or behaviours characterised by animosity or conflict. The employee conforms their activity and the use of the Company's assets to the criteria of correctness, cost-effectiveness, efficiency and effectiveness. The employee dedicates the right amount of time and effort to their activity and/or assignment, avoiding absences or undue distraction.

In relations with the outside world, the employee behaves in such a way as to establish trust and collaboration on the part of those who come

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into contact with the Company; they are expected to show courtesy and availability in communication with the public and to deal with issues efficiently and promptly.

2. METHODS OF DISSEMINATION OF THE CODE OF ETHICS

The Company is responsible for the application, dissemination and awareness-raising of this Code of Ethics throughout the company; a similar responsibility is assumed by the persons at the head of each company area/function who, in particular, are required to ensure compliance with the Code by all those who work within the area or function itself.

The Company will identify the means to disseminate this Code of Ethics in the most effective way, both towards its employees, collaborators and consultants, and towards third parties.

3. RULES OF CONDUCT AND PRECEPTS

A) RELATIONS BETWEEN EMPLOYEES

Relations between subjects within the Company must be characterised by correctness, transparency, loyalty and clarity, compliance with laws and regulations and respect for mutual roles as well as implementation of the rules of responsibility, professionalism and civil coexistence and tolerance of the prerogatives and duties of others.

B) HIERARCHICAL RELATIONSHIPS WITHIN THE COMPANY

The relationships between levels of responsibility, connected to the various hierarchical positions existing in the Company, must be carried out with loyalty and correctness, in compliance with the confidentiality of company processes.

All the managers of specific activities and organisational structures must exercise the powers connected to the delegation received with prudent balance, respecting the dignity of the person of their collaborators.

All the members of the organisational structures or specific work groups, in turn, must give the maximum collaboration to the managers of both, observing the provisions for the execution and discipline of the work given by the latter and, in general, by the company.

C) RELATIONS WITH PUBLIC INSTITUTIONS

The Company's relations with national, EU and international public institutions (*"Institutions"*), as well as towards public officials or persons in charge of public service, or bodies, representatives, agents, exponents, members, employees, consultants, persons in charge of public functions or services, public institutions, public administrations, public bodies, including economic ones, of public entities or companies of a local, national or international nature (*"Public Officials"*) are held by each director and each employee, irrespective of the function or position, or, if applicable, by each collaborator or consultant, in compliance with current legislation and on the basis of the general principles of correctness, transparency and loyalty .

D) TRANSPARENCY OF ACCOUNTING

The transparency and clarity of accounting data, reports and financial statements represent a fundamental value in relations with shareholders, third parties and supervisory bodies.

In order for this value to be respected, it is first necessary that the basic information and the accounting records of the transactions are complete, truthful, accurate and verifiable. Therefore, each collaborator is required to

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take steps to ensure that the management facts are correctly and promptly represented in the accounts, keeping adequate supporting documentation for the activity carried out for each operation.

E) CORPORATE COMMUNICATION

In order to avoid the dissemination of erroneous news and information or the emergence of situations involving liability of any kind and nature for the Company, communication outside the Company itself must be precise, clear and truthful, as well as aimed at promoting knowledge and consent to company policies, programs and projects of the same (Company).

Particular attention must be paid to the external communication of documents, news and information concerning facts which occur in the direct sphere of activity of the Company and which are not in the public domain.

Communication of information to the public must, in particular, be handled by the organisational structures responsible for this in an express manner.

Any relationships with the *mass media* must be based on compliance with the same rules already outlined for relations with public institutions and, in any case, on the protection of the Company's image.

F) CONFIDENTIAL INFORMATION

Confidential information and documents, personal data of collaborators and suppliers, know-how and technological processes should be kept and protected in an adequate and continuous manner, both with respect to third parties and to colleagues who are not directly involved in them. The subjects who, for work reasons, have access to them must, in any case, treat them according to the instructions and procedures established

by the Company.

At all times and, in particular, on the occasion of the stipulation and execution of contracts, the duty of confidentiality must be strictly observed in relations with third parties, with the press and with subjects not authorised to perform communication.

G) RELATIONS WITH CUSTOMERS AND SUPPLIERS

The selection of suppliers and the purchase of goods and services must take place in compliance with the principles of this Code and with the internal procedure using the written form and in compliance with the organisational structure.

In any case, the selection must take place exclusively on the basis of objective parameters of quality, convenience, capacity and efficiency.

In business relationships with customers and suppliers, donations, benefits, services of any other kind, both direct and indirect, gifts, acts of courtesy and hospitality are prohibited, unless they are of a nature and value such as not to compromise the image of the Company and cannot be interpreted as aimed at obtaining preferential treatment that is not determined by market rules.

H) PROTECTION OF THE COMPANY'S ASSETS

Each collaborator is responsible for protecting and preserving the assets and tools entrusted to them for the performing of their activity and/or task, as well as helping to ensure the protection of the entire assets of the Company.

Each collaborator is required to make diligent and responsible use of the premises where they perform their duties or tasks, while ensuring the



performing of activities that are compliant and respectful of the intended use of the properties themselves.

The collaborators, in carrying out their activities, must also guarantee compliance with the principles and rules of ethics and morality, also in a manner consistent with the precepts of morality.

The employees and collaborators of the Company, or any other person who is present within the corporate perimeter and who has contact within its executive and/or commercial area, must refrain from engaging in any behaviour that may be in conflict with religious faith.

Documents relating to the Company's business, work tools and any other tangible or intangible property owned by the Company must be used exclusively for the achievement of the Company's purposes and in the manner established by the same. They cannot be used for personal purposes, nor be transferred or made available, even temporarily, to third parties.

CHAPTER III

ENVIRONMENTAL PROTECTION

1. DISCIPLINARY SYSTEM FOR ENVIRONMENTAL PROTECTION

Regarding the risk of possible violation of environmental legislation, the analysis for the preparation of the Code of Ethics took into consideration the legislation in force and in particular Italian Legislative Decree 152/2006 (consolidated environmental text), Law 549/1993 for atmospheric emissions, and the UNI ENI ISO 14001/2004 standard.

It is expressly forbidden for recipients of the Code of Ethics to engage in, collaborate with or cause the implementation of behaviours that, considered individually or collectively, constitute a violation of the environmental legislation.

In particular:

- comply with the rules, obligations and principles defined by the current legislation and the guidelines on environmental matters;
- promote compliance with the afore-mentioned rules and principles and ensure compliance with the environmental obligations;
- adopt a conduct of maximum collaboration and transparency and respect the principles of conduct and behaviour in relations with public bodies who are competent in environmental matters;
- report to the subjects responsible for the environmental aspects any violations of the rules and any situation of potential or real danger.

CHAPTER IV IMPLEMENTING PROVISIONS

1. DISCIPLINARY AND SANCTIONING SYSTEMS

In any case of violation of the principles contained in this Code, where it is necessary for the protection of the corporate interest and compatibly with the current regulatory framework, also in terms of the provisions deriving from collective bargaining, the Company will evaluate any initiatives to be undertaken and the measures, also of a disciplinary and sanctioning nature commensurate with the seriousness of the violation, to be taken against persons who have engaged in conduct that does not comply with this Code of Ethics. In the latter case, additional compensation expenses in favour of the Company may be added to any sanctions in relation to the severity of the violation and the damage caused.

All the above procedures must in any case guarantee the confidentiality of the related information and indications, subject to legal provisions and/or specific provisions to the contrary made on the basis of the law in force.

2. REPORTS IN THE EVENT OF VIOLATION OF THE PROVISIONS OF THE CODE OF ETHICS

In order to guarantee the effectiveness of this Code, the Company prepares information channels through which all those persons who become aware of any illegal conduct carried out within the Company can report to it freely, directly and in a confidential manner.



It is the obligation of each employee and collaborator to report, without delay, any behaviour that is not compliant, including by third parties, with the principles of this Code. Confidentiality regarding identity is guaranteed to the whistle-blower, as well as immunity from retaliation, unlawful conditioning, problems and discrimination of any kind in the workplace for having reported the violation of the contents of the Code of Ethics.

3. SANCTIONING SYSTEM

Failure to comply with and/or violation of the rules of conduct indicated in this Code by employees of the Company constitutes a breach of the obligations deriving from the employment relationship and results in the application of disciplinary sanctions.

The sanctions that can be imposed will be applied in compliance with the provisions of the law and with the applied national collective bargaining agreement.

These penalties will be paid on the basis of the significance assumed by the individual cases and will be proportionate to their severity.

The ascertainment of the afore-mentioned infringements, the management of disciplinary proceedings and the imposition of sanctions remain the responsibility of the company functions designated and delegated to do so.

Any behaviour exercised by collaborators, consultants or third parties connected to the Company by a non-employment contractual relationship in violation of the provisions of the Code of Ethics may also determine, in the most serious cases, termination of the contractual relationship, without



prejudice to any request for compensation if this behaviour causes damage to the Company and this also regardless of the termination of the contractual relationship.

4. FINAL PROVISIONS

This Code was approved by the administrative body of the Company on 2 August 2021, which will determine the terms and methods of its dissemination and awareness-raising by the same Company.

Any variation and/or integration of the same will be approved by resolution of the administrative body of the Company and promptly disseminated to all recipients.

For any report please write to: codice.etico@polytrade.it