



# P.E. LABELLERS<sup>TM</sup>

## CODE OF ETHICS

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## Foreword

### Sustainability

The Company is deeply committed to sustainability and reports on its ESG performance in the Sustainability Report, which can be referred to for more information.

This Code of Ethics outlines the essential **principles** and **rules of conduct** to which our Company adheres. These principles and rules guide our Company's sustainable success, contributing to long-term shared value creation.

P.E. Labellers is inspired by and promotes values aligned with the most advanced international governance practices. We fully embrace a sustainable strategy through tailored policies, operating methods and initiatives, promoting a healthy, inclusive and sustainable global economy. Our strategy respects human and labour rights, safeguards the environment and ensures integrity in every aspect of our business practices.

Reaffirming the importance of sustainability, the Company has initiated a project to measure our performance across various sustainability fronts, the results of which are published in the Sustainability Report with a view to ensuring transparency towards our Stakeholders.

Adherence to the principles and provisions of the Code of Ethics is a fundamental requirement for senior management, employees, collaborators and all those who deal with P.E. Labellers. This commitment applies to all internal and external relations.

Board members in particular are expected to uphold the Code's principles when setting goals, proposing investments and executing projects, as well as in any decision or action related to their activities. Similarly, management must implement these principles in their daily operations, fostering internal cohesion and a spirit of cooperation, as well as in their interactions with third parties.

## Company presentation

### THE COMPANY

P.E. Labellers S.p.A. is a world leader in the design and manufacture of automatic and fully modular labelling machines.

P.E. Labellers is an Italian company that proudly ensures 100% Made in Italy production. Its registered, operations and management offices are located in Porto Mantovano (MN), with another 13 local units also situated within the province of Mantua.

P.E. Labellers serves a global market, with a strong presence in Europe (52%), South America (20%) and Asia (18%).

Since 2017, P.E. Labellers has been part of the US multinational ProMach Group, a world leader in the packaging industry.

In 2020, 5 operations companies were merged into P.E. Labellers, now representing 5 divisions – TRCG, TMC, CRM, Mondial and Packlab – responsible for the production of machine components.

P.E. Labellers owns a 99% majority stake in PE Latina LTDA, based in São Paulo, Brazil, responsible for the production and marketing of labelling machines in the Brazilian domestic market.

With almost fifty years of experience, P.E. Labellers has revolutionised the labelling industry by adapting its solutions to meet the evolving production needs of companies and the increasingly stringent quality standards imposed by the market.

### PRODUCT, CUSTOMER, PEOPLE

Running a successful business goes beyond delivering a **great product**; it hinges on **customer focus** and maintaining constant communication with **customers and suppliers** to build deep, long-term relationships. **People** are at the heart of our Company, and as such, P.E. Labellers is committed to fostering diversity, equal opportunities and work-life balance.

This approach is backed by a strategy of investing in research and development, supported by a robust organisational structure that promotes continuous **talent acquisition, development** and **retention**. These aspects pose an increasing challenge for companies, directly impacting their growth and market competitiveness. To address this, P.E. Labellers has implemented various initiatives to connect with top talent and ensure the merit-based professional development of its employees.

# Scope Addressees

**Corporate Bodies**  
Board of Directors, Shareholders' Meeting and Board of Statutory Auditors.

**Personnel**  
Employment contracts of all types, including those for senior management, project staff, part-time employees, temporary workers, interns and collaborative roles involving para-subordination.

**Collaborators**  
Those who, by virtue of a contract or mandate, act in the name and on behalf of the Company (consultants, intermediaries, special attorneys).

**Third Parties**  
Those who have business relations with the Company, such as suppliers, customers, partners, investors and the beneficiaries of social initiatives, donations and sponsorships.

The Addressees of the Code of Ethics are members of the Corporate Bodies, Personnel, Collaborators and Third Parties.

The Code of Ethics outlines the principles and rules that all personnel must follow, as mandated by the National Collective Labour Agreements regarding conduct and disciplinary actions. Adherence to the Code is required for all employment contracts, including those for senior management, project staff, part-time employees and collaborative roles involving para-subordination.

For members of the Corporate Bodies, compliance with the Code of Ethics is essential for starting or maintaining their relationship with the Company. The application of the Code of Ethics to collaborators and third parties requires them to sign declarations and/or the inclusion of specific clauses in their contracts, mandates, appointments or partnership agreements, setting out the obligation for adherence to the Code of Ethics and outlining the disciplinary action for any violations.

## Vision, Mission and Values

### VISION

In the dynamic market environment in which the Company operates, P.E. Labellers maintains a clear vision of its market position and objectives. This vision drives its ambition to be a leading manufacturer of labelling machines, aiming to not only meet but also exceed customer expectations, providing tailored solutions that enhance efficiency and improve the quality of the labelling process.

### MISSION

P.E. Labellers is driven by a daily mission rooted in solid values and a distinctive business philosophy.

Our goal is to integrate technological, mechanical and electronic innovation to create labelling machines of superior quality, designed to deliver high performance and reliability, fully meeting customer production needs while also focusing on sustainability and energy efficiency.

### VALUES

P.E. Labellers adopts this Code of Ethics in order to clearly and transparently define the values below, which are the cornerstones of the company culture.

#### PROACTIVENESS

Proactiveness means being fully dedicated to meeting customer needs, treating each customer as unique and nurturing the relationship with them every day.

#### HONESTY

Honesty involves not only following through on promises but also facing difficult situations with integrity and transparency, handling them effectively without backing down.

#### RESPONSIBILITY

Responsibility is crucial in striving for excellence. It requires hard work and dedication to deliver consistent results, tackling challenges with determination and integrity while continuously raising the bar to exceed expectations.

#### COMMITMENT

Commitment is a core value for the Company, reflecting our steadfast dedication to fulfilling promises, successfully completing every project and building strong, long-term relationships that drive sustainable growth.

**RESPECT**

Respect involves prioritising the needs of the team over individual interests, fostering collaboration and encouraging healthy competition to motivate everyone to contribute their best.

**AT THE FOREFRONT**

Being at the forefront means effectively managing both internal and external actions by carefully evaluating all possible options and consistently making the best decisions for the customer.



## Human resources and personal development

### INCLUSIVE WORK ENVIRONMENT

P.E. Labellers values its people as key to the success of its business. With this in mind, the Company fosters a work environment free from discrimination and abuse of power, where respect, cooperation and mutual support help unlock the full potential of our workforce. Specifically, the Company:

- Rejects all forms of forced and child labour;
- Opposes any behaviour that involves physical or psychological violence, coercion, harassment or bullying, or attitudes in any way associated with bullying and harassment;
- Rejects any form of sexual harassment, regardless of how it is manifested or legally defined, and considers any behaviour that causes discomfort or instils fear in others unacceptable and prohibited;
- Promotes fair, equitable, non-discriminatory and respectful labour practices, upholding the dignity of every individual;
- Promotes equal opportunities for all employees and candidates, with a particular focus on gender equality;
- Respects workers' rights and trade union freedoms, including the right to association and collective bargaining, also through responsible and constructive dialogue with labour organisations. This fosters a climate of mutual respect in line with principles of fairness, transparency and participation;
- Adopts merit-based selection and evaluation criteria that focus on competence and feasible, achievable goals;
- Ensures fair treatment in relation to roles, commitment and achievements, and supports a fair redistribution of the value created.

Relations with Personnel are grounded in the values of fairness, loyalty, transparency and mutual respect, and are governed from a contractual point of view in compliance with labour regulations in each country.

The values outlined in the Code of Ethics guide all professional and personal interactions within the company. Private or corporate interests must never be pursued in violation of the law, regulations, internal policies or control systems.

Every individual at the Company plays a key role in achieving the corporate objectives, adhering to the values and rules of conduct set out by the Code of Ethics. Relations between different levels of responsibility must be conducted with loyalty and fairness.

## DIVERSITY AND THE CULTURE OF PLURALISM

P.E. Labellers is dedicated to fostering diversity, equal opportunities and work-life balance. Within the organisation, the Company, promotes and supports working conditions and interpersonal relationships that enhance the integration of various cultures and lifestyles, respecting differences in gender, sexual orientation, age, nationality, health status, political views, race, religious beliefs and other forms of diversity.

The Company views pluralism and diversity as valuable resources that enrich and drive human development. We value each individual's unique contribution and strive to create an inclusive work environment that honours everyone's dignity and acknowledges the strength of differences.

P.E. Labellers expects all Addressees to embody and promote these values of diversity, actively avoiding and addressing any form of discrimination. Our Company also supports organisational models that encourage collaboration among people from different backgrounds and implements training, communication and operational strategies to advance a culture of inclusion.

Specifically, P.E. Labellers is committed to integrating employees with disabilities as a crucial part of its growth strategy.

### Measures for integrating employees with disabilities

Confirming its people-oriented approach, at P.E. Labellers, we are committed to integrating employees with disabilities to promote equal opportunities and inclusion.

## PROFESSIONALISM AND CONTINUOUS TRAINING

P.E. Labellers prioritises the development and enhancement of its employees' skills by fostering a dynamic and stimulating learning environment. We invest heavily in training, recognising it as a key driver of professional growth, which, in turn, is essential for the company's continued growth and success. By promoting a culture of knowledge sharing, P.E. Labellers values the contributions and behaviour of each individual.

## HEALTH, SAFETY AND WELL-BEING

P.E. Labellers prioritises occupational health and safety, striving to create a safe workplace and enhance employee health and well-being. The Company is dedicated to fostering a consolidated culture of health and safety in the workplace, raising risk awareness, providing thorough training and ensuring all-round compliance with the Workplace Safety Management System. This commitment safeguards the physical and mental well-being of all personnel and anyone else working, entering or temporarily visiting the Company's facilities.

The same approach is applied to building and maintaining inclusive and motivating work environments that support general well-being.

All Addressees must adhere to legal and internal regulations, as well as other guidelines, to prevent safety risks and ensure a healthy and hygienic workplace for all.

## RECRUITMENT

Human resources are a core element upon which the Company relies to achieve its objectives. When selecting personnel, the Company uses criteria to evaluate individual skills, abilities and potential.

P.E. Labellers values and supports the development of each Addressee's skills and abilities through organised training and professional development programs. All Addressees are expected to diligently engage in these activities and report any needs for additional or specialised training so the Company can take appropriate action.

While maintaining strong connections with the local community, the Company is committed to contributing to the city's development by hiring young talent from across Italy, aiming to enhance interaction between the Company and the urban fabric through its services.

## EMPLOYEE OBLIGATIONS

The Code of Conduct is an integral part of every employee's contract. Consequently, the Company demands strict adherence to the Code's provisions. Violations are firmly addressed, with appropriate disciplinary actions imposed. Employees, therefore, are required to:

- Fully implement the Code's provisions relevant to their role, including participating in training activities;
- Act in accordance with the Code and avoid any conduct that may harm the Company or compromise its integrity, impartiality or reputation;
- Promptly report any breaches of the Code to the Company's Supervisory Board;
- Adhere to all internal procedures established by the Company to ensure compliance with the Code and address any breaches thereof;
- Consult the Supervisory Board for clarification on the Code's interpretation;
- Cooperate fully with any investigations related to Code violations, maintaining strict confidentiality regarding the investigations.

The Company is committed to preventing its employees, including senior management and their subordinates, as well as any Addressees acting on its behalf, from engaging in activities that could lead to the pecuniary and/or prohibitory sanctions provided for by Legislative Decree no. 231/2001 (where applicable), in the event such offences are committed to the benefit or in the interest of the Company.

## Corporate policies

### ENVIRONMENTAL PROTECTION

P.E. Labellers recognises the importance of environmental issues and is dedicated to minimising the environmental impact of its operations. This includes promoting climate change mitigation through the use of renewable energy sources, wise management of non-renewable resources to avoid wasting natural resources, and reducing environmental impacts across its value chain, such as minimising the ecological footprint of purchased product logistics.

The Company and all employees comply with current laws and regulations, committing to responsible behaviour and practices that reduce both direct and indirect environmental impacts. This involves seeking solutions that protect the environment, reduce pollution, and conserve natural and energy resources. Each Addressee is expected to contribute to exemplary outcomes in these areas, through their roles and actions.

The Company actively supports scientific and technological advancements in the appropriate fora and through its industrial activities, that promote environmental protection and resource conservation.

### INTELLECTUAL PROPERTY AND NEW PRODUCT DEVELOPMENT

Protecting the Company's intellectual property—including patents, trade secrets, trademarks, technical and scientific knowledge, know-how, and skills—is crucial for maintaining our competitive edge.

Employees are responsible for defining, safeguarding and defending the Company's intellectual and commercial property rights, and for exercising said rights responsibly. In addition to protecting the intellectual property rights of the Company, they must also respect the intellectual property rights of others.

### COPYRIGHTS

Certain materials used by employees and representatives in performing their activities may be protected by copyright laws. Unauthorised reproduction, distribution or modification of copyrighted materials without the rights holder's consent is prohibited under this Code, except where legally exempt under so-called "fair use".

Unauthorised duplication of copyrighted materials may result in infringement liable to civil and/or criminal penalties. Although copyright infringement normally involves the unauthorised duplication of publications or other printed materials, it can also include the unauthorised use of photographs and graphic displays or designs.

Computer software is normally protected by copyright and licensed agreements, which may restrict usage. Copying or using software beyond the licence terms is prohibited unless provided for by the licence agreement or legally exempt.

## CONFLICTS OF INTEREST

A conflict of interest arises when the personal interests of an individual (subjective element) in a particular field (sensitive activity) could harm or potentially harm the Company or its customers, either directly or indirectly (objective element).

To identify conflicts of interest, the following elements must be assessed:

- *Subjective Element:* The presence of an individual whose role or responsibilities could cause harm to the Company or its Customers due to a potential conflict of interest;
- *Sensitive Activity:* An activity whose significance and potential outcomes could lead to harm to the Company or its Customers, if conducted under a conflict of interest;
- *Objective Element:* An objective outcome that, if achieved under a conflict of interest, could damage the Company or its Customers.

The main areas where a conflict of interest may occur, which are covered by this Policy, include:

- Supplier selection and relationships;
- Management of gifts and benefits;
- Management of sponsorships;
- Management of donations;
- Recruitment and selection of human resources.

## Corporate resources and assets

## RESPONSIBLE USE OF CORPORATE ASSETS AND INFORMATION SYSTEMS

All Addressees are responsible for diligently safeguarding company assets and avoiding any misuse that could cause damage, reduce efficiency or in any case contradict corporate provisions.

Each person must protect the company's assets and manage computer systems under their control appropriately.

The use of company internet and email accounts should be strictly limited to work-related matters.

## CONFIDENTIALITY, CORPORATE INFORMATION

Company information and documentation are crucial assets for the Company and its stakeholders, and unauthorised disclosure can cause significant economic and reputational harm.

Without prejudice to the relevant provisions of the law, Personnel and collaborators must maintain strict confidentiality regarding documents and any news and information acquired through their role.

Personnel and Collaborators may not use the information and documentation acquired through their role for anything other than professional use and are bound by strict observance of professional, commercial or industrial secrecy. Confidential information may only be shared within the company with those who require it for work-related reasons.

All Addressees are strictly prohibited from making personal investments, whether direct or through an intermediary, based on confidential company information or inside information.

## MANAGING SPONSORSHIP AND GIFTS

Gifts, in general, should be aimed solely at enhancing the Company's image. For this reason, in relations with customers, suppliers and third parties (e.g. public, national, EU and/or international institutions) it is generally prohibited to offer/accept money, gifts or benefits, even in a personal capacity, for the purpose of obtaining undue advantages of any kind, contrary to official duties or in any case in breach of any regulations.

Acts of commercial courtesy towards or from third parties are acceptable provided they are of modest value and do not compromise integrity or influence the recipient's independent judgement.

Any form of bribery or corrupt practices towards third parties, whether private or public, is expressly prohibited, insofar as contrary to the Company culture.

## Anti-corruption, integrity and compliance

## COMPLIANCE WITH THE LAW

Compliance with the law and the Company's Articles of Association is essential for P.E. Labellers. Within the scope of their role, Addressees must comply with the applicable regulations (national, supranational or foreign) of the legal system in which they operate, and must refrain from any illegal activities, subject or otherwise to imprisonment, fines, administrative or other sanctions.

To this end, each Addressee shall endeavour to diligently acquire the necessary knowledge of the legal provisions applicable to their role, as in force from time to time.

In addition to adhering to the general principles of diligence and loyalty outlined in Article 2104 of the Italian Civil Code, each Addressee must also follow the behavioural guidelines specified in the relevant collective agreements.

## COMPLIANCE SYSTEM 231/01

In Italy, Legislative Decree 231/01 introduced a Supervisory Board to oversee the criminal liability of entities.

This Board, established under Article 6(1)(b) of the Decree, is tasked with supervising the effectiveness of, and compliance with the Company's criminal liability model, as well as updating it and proposing changes and/or integrations to the Board of Directors as necessary.

The SB has the necessary requisites of integrity, professionalism, autonomy and independence and performs the tasks assigned to it, ensuring the necessary continuity of action.

The Organisation and Management Model pursuant to Legislative Decree 231 is disseminated and integrated throughout the organisation, with ongoing training and information sessions at all company levels, which are periodically repeated in a continuous cycle of awareness-raising and updating. Likewise, for external partners – such as collaborators and suppliers – the policy involves sharing the Company's core principles and explicitly requiring that they adhere to and align their business conduct and activities with the highest standards, as mandated by P.E. Labellers.

## COMPLIANCE WITH THE LAW AND APPLICABLE INTERNAL REGULATIONS

Regulatory compliance is a prerequisite of this Code. Company personnel shall comply with all applicable laws and regulations in any country where P.E. Labellers produces, distributes and sells its own products. The implementation of this Code shall not, under any circumstances, imply a violation of any prevailing legal provisions in any country where P.E. Labellers operates.

P.E. Labellers personnel must adhere to the Company's regulations and internal policies, and follow any related instructions.

The Company undertakes to equip employees with all necessary resources to understand and comply with both internal and external regulations relevant to their roles. If this Code is breached, the Company has established a confidential investigation and reporting procedure that enables anyone associated with the Company to anonymously and/or discreetly report any potential violations.

## CONFIDENTIALITY OF INFORMATION AND PERSONAL DATA PROTECTION

In carrying out its operations, the Company handles substantial amounts of confidential information and personal data. Consequently, we are committed to adhering to all relevant laws and progressively

adopting best practices at both national and international levels. The Company also strives to uphold high security standards in the selection and use of its information technology systems for processing confidential and personal data.

P.E. Labellers personnel, or anyone collaborating with the Company in any capacity, must safeguard the information and know-how generated within the organisation, owned by the Company or entrusted to it. Said persons are prohibited from using any data, information, or documents acquired through their professional activities for personal gain. Likewise, they must not disclose any information to third parties unless required by law, P.E. Labeller's internal regulations, or if they have been expressly authorised to proceed.

## ACCOUNTING RECORDS

All transactions made by the Company that may have economic implications shall be transparently and accurately recorded in the Company's accounting records and made accessible to both internal and external auditors. Moreover, the accuracy and integrity of all disclosed financial information shall be ensured.

P.E. Labellers is dedicated to implementing and upholding a reliable system of internal control over financial reporting, with continuous oversight to ensure its effectiveness. Accounting records shall be accessible to internal and external auditors at all times.



## FIGHT AGAINST CORRUPTION

P.E. Labellers is firmly committed to combating all forms of corruption in every country where it operates, aiming to prevent and counteract corruption in all its forms, whether public or private, including:

- Active corruption: offering or promising benefits (such as money, gifts, or other incentives) to induce someone to breach their duties;
- Passive corruption: soliciting or receiving benefits from a third party, entailing a breach of one's duties.

To this end, the Company condemns any behaviour that violates laws, regulations, internal policies, or the principles of sound and transparent business management. These principles, as outlined in our Code of Ethics, guide our interactions with all Stakeholders.

P.E. Labellers works to actively prevent potential corruption offences using all available tools and resources, including staff training, continuous monitoring of high-risk activities, and the enforcement of disciplinary action for violations.

The Company rigorously addresses behaviour not in line with ethical principles and legal standards, implementing policies regarding interaction with and involvement of personnel and third parties (such as suppliers and collaborators). We believe that all Stakeholders can contribute to preventing and mitigating the risks inherent in business practices, ensuring sustainability in the medium to long term.

## MARKET AND FREE COMPETITION

In its dealings with customers and suppliers, the Company is committed to adhering to principles and laws that protect competition, engaging with the markets in a fair and honest manner, trusting in the quality of its products and respecting contractual agreements.

All Addressees of this Code of Ethics must also refrain from applying undue pressure, acting deceptively or in any way that could disrupt the commercial and business practices of others or hinder free market competition.

## Third-party dealings

### SUPPLIERS

The Company requires its suppliers to uphold human rights, workers' rights and environmental standards in their operations.

Supplier selection and the formulation of purchase conditions are guided by values and criteria including competitiveness, objectivity, integrity, fairness, impartiality, reasonable pricing and quality of goods or services, carefully assessing service guarantees and the overall market offerings.

Purchasing processes must seek the maximum competitive advantage for the Company while ensuring fairness and impartiality towards all qualified suppliers. In particular, employees involved in these processes must:

- Not exclude any qualified supplier from bidding, using objective and documentable criteria to select candidates for the shortlist;
- Ensure adequate competition in supplier selection;
- Use suppliers committed to complying with applicable laws, regulations and this Code of Ethics.

Specifically, an employee acting on behalf of the Company must not:

- Receive any form of remuneration from third parties for performing an act that either falls under, or is contrary to their assigned tasks;
- Accept any form of external influence, unauthorised by the company, in making decisions regarding the choice of supplier.

### CUSTOMERS

P.E. Labellers respects the Human Rights of its customers and is committed to clear and transparent communication, as well as providing safe products and services.

P.E. Labellers strives to offer its customers products of the highest standards of excellence, quality, health and safety. Products will be manufactured ethically and responsibly in line with our health and safety standards.

Employees, in their dealings with customers and in complying with internal regulations, are expected to prioritise customer satisfaction, adhering to principles of cooperation, helpfulness, professionalism, transparency, confidentiality and privacy protection.

Customer communications shall be clear, comprehensible and comply with applicable regulations.

Moreover, the Company pledges not to use misleading or false advertising and to ensure that all advertising, commercial or other communications are truthful, guaranteeing that our products and services meet the advertised standards.

The Company shall not resort to deceptive or unfair practices, providing customers with complete and transparent information to ensure informed decision-making.

## DEALINGS WITH FOREIGN SALES SUBSIDIARIES

P.E. Labellers requires its branches to adhere to the values outlined in the Code of Ethics and to cooperate loyally in achieving objectives in full compliance with the law and applicable regulations. The Company refrains from any conduct that could harm the integrity, autonomy or reputation of its branches.

Information must be communicated truthfully, accurately, comprehensively, clearly and transparently.

## POLITICAL ORGANISATIONS AND ASSOCIATIONS

Employees may engage in political or associational activities only on a personal basis, in their own time, at their own expense, and in accordance with applicable laws.

The Company is prohibited from making direct or indirect contributions, in any form, or allocating funds and financing to support political parties.

## Dealings with public authorities

### DEALINGS WITH PUBLIC AUTHORITIES

Dealings with Public Authorities must be conducted with utmost transparency, clarity and fairness to avoid any biased, false, ambiguous or misleading interpretations by public officials with whom relations are held in varying capacities, while respecting each other's reciprocal roles.

Relations with Public Authorities, whether Italian or foreign, are limited to designated individuals specifically and formally authorised by the Company to deal with or have contact with such public authorities, officials, bodies, organisations and/or institutions.

In particular, it is strictly prohibited to promise or offer, directly or indirectly, money, gifts or any other benefits to managers, officials or employees of Public Authorities or their relatives, whether Italian or foreign, in order to influence their independent judgement or secure undue advantages.

Illicit payments made directly by Company employees or through intermediaries, both in Italy and abroad, are considered acts of corruption.

Moreover, it is prohibited to hire former employees of Italian or foreign Public Authorities, or their relatives, with whom the Company has had business dealings, and who have endorsed the Company's requests to Italian or foreign Public Authorities.

During business negotiations with Public Officials, it is strictly prohibited, for example, to engage in activities such as promoting employment or business opportunities that may benefit Public Officials or persons in charge of Public Services, soliciting or exchanging confidential information that could compromise the integrity or reputation of either party, or performing any other acts designed to induce Public Officials and/or persons in charge of Public Services, whether Italian or foreign, to act or refrain from acting, in violation of applicable laws.

It is also prohibited to use state or other public body contributions, subsidies or financing, regardless of the value, for purposes other than those for which they were granted.

Lastly, the Company condemns any attempts to obtain contributions, financing, subsidised loans or similar disbursements from the State or other public bodies through altered or falsified declarations and/or documents, omission of information, or, more generally, any form of deception, including via computer or telematic systems, aimed at misleading the disbursing body.

## JUDICIAL AUTHORITY AND SUPERVISORY AND CONTROL BODIES

Relations with judicial authorities and supervisory and control bodies are defined by utmost cooperation and transparency.

The Company is committed to fully cooperating with judicial authorities and supervisory and control bodies during any investigations involving itself or its business partners, and will not obstruct their institutional activities, either actively or passively.

Specifically, it is prohibited to:

- Pressure individuals required to testify before the judicial authorities or supervisory and control bodies to withhold or provide false statements;
- Assist those who have committed criminal offences in evading investigations or avoiding detection by authorities.

In its periodic communications and specific reports, the Company ensures that all information provided is complete, accurate and objective, and that all legal or regulatory requirements imposed by the authorities are met within the specified deadlines.

It is prohibited to give, offer or promise, either directly or indirectly, money, gifts, goods, services or favours (including employment opportunities) to representatives of judicial authorities or supervisory and control bodies to gain undue favourable treatment or influence the outcome of audits, inspections or document reviews.

## Implementation and control mechanisms

### PROMOTION, DISSEMINATION AND TRAINING

The Company is committed to making the Code of Ethics and related documents accessible to all stakeholders, including through publication on its official website.

It will also implement targeted training programs for Corporate Bodies and Personnel to ensure thorough understanding of the Code of Ethics.

The Code of Ethics will also be shared with relevant counterparts and published on the Company's website.

### ORGANISATION, MANAGEMENT AND CONTROL MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

The Code of Ethics is a prerequisite for, and an integral part of the Organisation, Management and Control Model adopted by the Company pursuant to and for the purposes of Legislative Decree no. 231, 8 June 2001.

The Supervisory Board, appointed by the Board of Directors pursuant to Legislative Decree no. 231, 8 June 2001, is responsible for monitoring compliance with the Code of Ethics.

The Company Board of Directors, through its decisions and actions, is responsible for promoting an ethical climate consistent with the values expressed in the Code of Ethics, within the organisation.

The operational implementation of the rules of conduct set out in the Code of Ethics is the responsibility of the designated Directors and all Company Personnel, each within their respective areas of responsibility.

The Board of Directors is tasked with updating the Code of Ethics, incorporating corrective or improvement measures proposed by the Supervisory Board, to ensure it remains aligned with evolving civil and social standards as well as changes in regulations and practices.

### INQUIRIES, COMPLAINTS AND REPORTS – Whistleblowing System

The Company implements measures deemed suitable to ensure timely reporting of any violations of the Code of Ethics. Reports should be detailed and factual. All Company employees and collaborators are required to cooperate with the Supervisory Board by providing necessary documentation for their investigations.

In the event of doubts regarding the legality, ethical implications, or Code compliance of any conduct, individuals should consult their superior and/or the Supervisory Board for guidance. Reports of possible wrongdoing by Addressees can be made using the appropriate web platform (<https://areariservata.mygovernance.it/#/WB/P.E.Labelers>). The Whistleblower may also request an in-person interview with the HR Department, by sending an email to [pe.hr@promachbuilt.com](mailto:pe.hr@promachbuilt.com), to submit their report. Reporting channels are designed to protect the confidentiality of the Whistleblower's identity.

## DISCIPLINARY FRAMEWORK

The Company condemns any conduct that violates the Code of Ethics, even if such conduct is undertaken in the interest of P.E. Labellers, i.e. with the intention of benefiting the Company.

Violations of the Code of Ethics are subject to the disciplinary framework outlined in the Company's Organisation, Management and Control Models.







[www.pelabellers.com](http://www.pelabellers.com)