Scatolificio GIANI S.r.l.

ETHICAL AND SOCIAL POLICY

Rev. 2 Pag. 1 di 4 10/5/21

Introduction

The company associates work constantly to ensure the continuity and sustainability of the company which has been started over 40 years ago for the solid coated cardboard production, for packaging of footwear and other non-food goods like as perfumes, bottles, leather goods.

The aim of continuously consolidating and developing the reached market position, it happens through a continuous improvement in infrastructures and strategic choises which are able to satisfy the actual and potential costumers' requirements, involving all the company staff too.

There is always an high attention to improve the reached quality in organizational, operational and of course product aspects.

It is important that associates, employees and all those connected to us comply with our ethical morals and Code of Conduct to take care and strenghten our image and to continue to satisfy our costumers.

This ethical and social policy is another step that the Directorate implements as part of continuous improvement process previously mentioned and it serves to demonstrate the seriousness and morals which distinguish our company to increasingly heterogeneous and active in several countries costumers.

This document adds itself to the Integrated Corporate Policy which encompass the quality, environmental, sustainability and workplace safety thematics.

1. Reports and Complaints

All the staff, if it becomes aware of a situation which in his opinion may constitute a violation of a law, a regulation, internal provisions or provisions received from our costumers or this Code, must report the violation or the suspicious situation either to the management system manager or to the workers' safety representative or through an anonymous report using the specific letterbox.

Our ethical and social policy prohibits retaliations if the staff presents a good faith complaint related to a behaviour which the staff reasonably believes being non-ethical or constituting a violation of law, internal provisions or provisions received from our costumers, of this Code or of other **Scatolificio Giani** policies.

The aim is to face and to resolve as soon as possible any personal, departmental or corporate issues.

After having received and having assisted at the presentation of this Policy, each person confirms the receiving, the acknowledgment and that he/she understands his obligations to comply with it, subscribing the MOD. 6.4 SCO.

2. Equal Opportunities Policy

We favor an equalitarian workspace at **Scatolificio Giani srl**, in which all the employers are valued and they have got the opportunity to express their potential. We enclose the diversity of thought, way of being, experience and culture. We intend to ensure equal opportunities of employment to all regardless of:

- Race;
- Skin color;
- Religion;
- Gender;



Scatolificio GIANI S.r.l.

ETHICAL AND SOCIAL POLICY

Rev. 2 Pag. 2 di 4 10/5/21

- Pregnancy status;
- Gender and expression identity;
- Age;
- Marital status;
- Sexual orientation;
- Nationality of origin;
- Citizenship status;
- Disability;

The Directorate is committed in insuring the application of this policy regarding recruitmentes, layoffs, salaries, promotions, formative activities, apprenticeship, employment references or other terms, conditions, and privileges of employment. We effect a whole non-discriminatory policy.

3. Discrimination and harassment

The company is determined to ensure that all the staff works in a safe workspace and in an atmosphere marked by respect for the person, respecting the values of equality, fairness, respect, courtesy and dignity. Behaviours of discrimination or harassment committed by employers, supervisors, costumers, salespeople, suppliers, consultants, visitors or any other person are not allowed. In case of violation of this company policy, **Scatolificio Giani** is going to implement promptly all the possible appropriate and legal actions (for example disciplinary measures. Any form of discrimination or harassment based on race, skin color, religious beliefs, age, gender, pregnancy status, marital status, sexual orientation, identity or gender expression, nationality, citizenship status, disability, or any other category protected by law, constitute a violation of this policy and may be subject to disciplinary actions.

Furthermore, they are also forbidden those behaviours which are inappropriate in the workplace, although they aren't constituing a law or bylaw violation, in order to create a climate of respect and professionalism in the workplace.

They are forbidden verbal, visual or physical behaviours, by way of example but not limited to, that:

- Have the purpose or effect of creating an intimidating, hostile or offensive work environment or to unreasonably interfere with individual's work performance; or
- Adversely affect a person's employment opportunities in other way. Here are some examples of behaviour which can be considered harassment:
- Swearing, snide remarks, obscene jokes, insults, foul language, epithets and heavy sarcastic jokes;
- Displaying offensive posters, symbols, cartoons, drawings, computer images or e-mail messages; or
- Threats or physical intimidation of another person.

Sexual harassments enclose sexual behaviour when:

- The employment relationship of a person is subordinated to submitting to such conduct, explicitly or implicitly;
- Decisions regarding the employment relationship or promotion of a person are based on whether this one accepts or refuses to submit to this conduct;
- Those behaviours have the purpose or effect of creating an intimidating, hostile or offensive work environment or to unreasonably interfere with person's work performance.



Scatolificio GIANI S.r.l.

Pag. 3 di 4 10/5/21

Rev. 2

ETHICAL AND SOCIAL POLICY

Sexual harassments can enclose all the examples of harassment descripted before. Other examples of behaviours which can be considered sexual harassments:

- Proposals and requests of sexual nature not welcome;
- Physical contacts unwanted as, for example, hugs, kisses, to grab, to pinch or pats or to rubs against another person;
- Inappropriate comments on body or on outward appearance of a person, obscene gestures or comments or physical or verbal courtships;
- Rude or obscene gestures, language or comments.

4. Health, safety, security and the environment

Scatolificio Giani ensures his commitment to guarantee a healthy and safe work environment for his employers, in full compliance with the provisions of Legislative decree 81/2008 and subsequent modifications and integrations and with the other hygiene and safety standards in workplaces. We ask all the staff to behave in compliance with healthy and safety provisions in workplaces to protect their own safety and collegues, costumers and suppliers, visitors and any other subject, who can be in our establishment, one's.

We also ask all the staff:

- To conduct our operational activities in a compliant manner with environmental laws and regulations, minimizing any harmful effect on the environment;
- To frequent any formation course in a careful way to effectuate the operational activities safely and responsibly (usage of materials, equipments, gear and means);
- To understand the dangers and to respect the safety procedures relative to management of any hazardous materials in the various stages of purchase, storage, handling, use and disposal;
- To ensure that contractors, suppliers or colleagues work in a manner consistent with these provisions;
- To be vigilant in environment work, reporting any safety concerns.

Violence acts or threats, acts of intimidation and hostility towards another employee or other subjects are not tolerated in the workplace and even outside.

Nobody can hold weapons of any kind or other devices or dangerous substances at the corporate headquarters or on vehicles.

This are examples of forbidden behaviours (non-exhaustive list):

- To engage in behaviours which hurt another person or designed or potentially capable of injuring another person;
- To make or to send directly or through third parties discriminatory or threatening statements in verbal and/or writed form;
- To hold an aggressive, threatening or hostile behaviour, enclosing bullying;
- To engage in behaviour which damages the properties of the box factory or of others, or which is designed or has the probability of damaging those properties.
- To hold unauthorized behaviour of stalking or surveillance of another person;
- To commit or to threaten to commit violent acts:

Those behaviours are forbidden rather if they are held in person, nor if they are applied through telephonic calls, e-mail, text messages, mail or through any form of electronic or other communication.

Scatolificio Giani does not entrust production phases to private subjects.

5. Political and social conduct

We respect the right of all the personnel to take part in political and association activities.

Those activities have to happen outside working hours and factory and they must not be object of discrimination and harassments towards other collegues.

The personnel can freely join trade unions and other workers' representative organisations, taking part to promoted activities in compliance with the provisions of the relevant regulations and agreements.

6. Employment contract and salary

A copy of the employment contract has been distributed to each employee. So all the workers can fully know the rules of the employment relationship. The company directorate is available to clarify, directly or through its consultants on this matter, the whole informations and requests of its personnel, in the quickest possible time.

Scatolificio Giani ensures full compliance with all conditions and rights due to workers with reference to the aforementioned employment contract, for example minimum salary, working hours, payment of any overtime on working days and holidays.

The personnel recruitment policy provides that new recruits must have reached the age of 18.

Scatolificio Giani does not practice forced labour.

7. Pregnancy of workers

Scatolificio Giani ensures full compliance with the legislation established by Legislative Decree 81/2008 to pregnant workers. The employer evaluates the presence of any tasks/forbidden works for pregnancy and/or breastfeeding and provides for the employee to be exempted from them, in collaboration with the competent doctor and with the responsible for prevention and protection and having consulted the workers' safety representative.

Scatolificio Giani does not carry out and does not request pregnancy tests when these are not required by current legislation.

The Directorate