

**ARCA Group**  
**Arca Etichette S.p.A.**  
**Arca Sleeves s.r.l.**  
**Etifix s.r.l.**

**Code of Ethics**

Approved by the Board of Directors of Arca Etichette S.p.A. by resolution on 8 April 2021.

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## FOREWORD

### Benefit Companies and a Common Benefit Purpose

Arca Etichette S.p.A. is by its corporate statute a Benefit Company (BC). So are its subsidiaries Arca Sleeves srl and Etifix srl, by their own corporate statutes. The three companies make up the Arca Group.

Each company within the Arca Group, in compliance with Italian legislation on BCs, thus adopts in its corporate purpose both profit aims for shareholders and common benefit aims for other stakeholders.

The following are the common benefit purposes for the Arca Group's three BCs:

#### **ENVIRONMENTAL sector**

The Company recognizes the Environment as an essential function for the peaceful and livable co-existence of humanity on the Planet.

In order to help create conditions of prosperity for the biosphere, the Company undertakes to act in a responsible manner, so as to not cause damage to the environmental system, promoting production models that favor closed cycles, taking as little as possible from natural systems, reducing consumption and waste of resources, managing production processes with low environmental impacts and promoting the dissemination and involvement of customers and suppliers to stimulate common actions on environmental issues that are strategically and mutually relevant within the value chain.

#### **PEOPLE sector (employees and social context)**

The Company recognizes that people play a leading strategic role in the social and corporate context.

The Company promotes human and cultural development on a par with professional and work development, and is committed to creating an environment suitable for promoting a productive, rewarding and satisfying sense of well-being, as well as stimulating and rewarding creative thinking, providing ongoing training and an exchange of knowledge and skills, while sharing objectives and results.

#### **COMMUNITY sector**

The Company recognizes social functions and the role of its positive forces within its own territory, being aware that companies develop hand-in-hand with everything around them, and that this may involve redefining the way in which business activities generate wealth and well-being, in consideration of social and environmental balances.

The Company wishes to increase its corporate citizenship and is committed to improving its social impact by supporting and promoting community projects, spreading a culture of sustainability in the area in which it operates, activating synergistic partnerships with local stakeholders guided by reciprocity of intent, and striving for transparency in purposes and methods, including through the care and conservation of values, culture, processes and best practices.

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## CODE OF ETHICS

### PRINCIPLES AND COMMITMENTS

The Code of Ethics identifies and disseminates principles of diligence, correctness, loyalty and transparency, to which Arca Etichette S.p.A. - Benefit Company (hereinafter "Arca Etichette" or the "Company") – the parent company of the Arca Group - and its subsidiaries (hereinafter, the "Subsidiaries" and, together with Arca Etichette, the "Arca Group" or the "Group") inspire their operations within their organizations and in the management of internal and external relations. Compliance with these principles constitutes the foundation for the reliability of management, reputation, image and the pursuit of the objectives of all Group companies.

The Code of Ethics therefore expresses the commitment of Arca Etichette and Arca Group companies to operate not only in compliance with the laws and regulations in force, but also in accordance with ethical principles and rules of conduct; as such, the Code of Ethics describes a set of values and models of behavior to which the Directors, Board of Statutory Auditors, Management and employees of Arca Etichette and its Subsidiaries, as well as all those who work for them, are inspired and conform to, in the pursuit of corporate objectives.

Arca Etichette is committed to promoting knowledge and awareness of the Code of Ethics towards its own employees and those of its Subsidiaries, and towards all Stakeholders within the Arca Group.

Compliance with the rules of conduct established in this Code of Ethics constitutes a constant commitment and a duty for all those who work with and for Arca Etichette and the Group's companies.

Arca Etichette constantly monitors the attentive observance and implementation of the Code of Ethics within the Group, adopting suitable tools and procedures for information, prevention and control in order to ensure the transparency of operations and behaviors at Arca Etichette.

### SCOPE OF APPLICATION OF THE CODE OF ETHICS

The Code of Ethics applies to Arca Etichette and its Subsidiaries, in particular to:

- Arca Group employees and collaborators, regardless of the legal nature of their relationship with Arca Etichette and its Subsidiaries;
- the directors and members of the Board of Statutory Auditors;
- all persons and entities operating in the name and on behalf of the Arca Group or under its control, by way of example, but not limited to: consultants, suppliers, business partners, collaborators and agents.

All persons indicated are hereinafter jointly defined as "**Recipients**".

### APPROVAL AND DISCLOSURE

The Code of Ethics, approved by the Board of Directors of Arca Etichette by way of an initial resolution of 8 April 2021 and any subsequent amendments and updates, is also implemented by the Subsidiaries, thereby rendering it structural to all the Group's activities.

The Code of Ethics is made available to all internal and external Arca Group stakeholders, through publication on the company's website.

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VALUES

**BEHAVIORAL INTEGRITY AND COMPLIANCE WITH LAWS AND REGULATIONS**

The Group's Companies undertake to create and supply quality products and services and to compete on the market according to the principles of fair and free competition and transparency, maintaining correct relationships with all public, governmental and administrative institutions, as well as with citizens and outsourcers. In any and all situations, people are required to operate with integrity, transparency, consistency and fairness, conducting every business relationship with honesty. The Group operates in strict compliance with the law and makes every effort to ensure that all personnel act in this sense: people must behave in accordance with the law, regardless of the context and the activities carried out, and the places in which they operate. This commitment must also apply to consultants, suppliers and anyone who has relations with our organization. The Arca Group will not initiate or pursue any relationship with anyone who does not intend to align with this principle.

**TRANSPARENCY AND BUSINESS ETHICS**

As for any other company within the Group, Arca Etichette operates in compliance with the provisions of the law, regulations and by-laws, as well as with national and international accounting standards, as regards the keeping of accounts and the preparation of annual financial statements, including all types of administrative, fiscal or financial documentation required by current legislation.

Compliance with the principle of accounting transparency is ensured within the Group, being based on the truthfulness, accuracy and completeness of basic information for recording each and every relevant transaction. Each member of the corporate bodies of the various Group companies is required to collaborate, within the scope of their responsibilities, so that management facts are correctly and promptly represented in the accounting records. It is forbidden for all Recipients to engage in behavior that may prejudice the transparency and traceability of accounting and financial statements.

Arca Etichette pursues the goal of developing the value of competition, operating according to principles of fairness, fair competition and transparency towards other operators on the market. In fulfilling their work and performance, the Recipients of the Code of Ethics operate with impartiality and neutrality in all company processes and make decisions with rigor and transparency, in compliance with the law and internal protocols.

**REJECTION OF ANY FORM OF DISCRIMINATION**

In decisions that affect relations with interested parties (personnel management and work organization, selection and management of suppliers, relations with the surrounding community and with the institutions that represent it), our organization avoids any discrimination based on age, gender, sexuality, health, race, nationality, political opinions and religious beliefs.

**CENTRALITY, DEVELOPMENT AND ENHANCEMENT OF HUMAN RESOURCES AND FAIRNESS IN AUTHORITY**

The Group recognizes the centrality of human resources and believes that an essential factor for success and development is the professional contribution of the people who work there.

The Group attaches the utmost importance to those who work within their organization, in deference to the legal and contractual provisions regarding the duties of workers, employees are required to show professionalism, dedication to work, loyalty, a spirit of collaboration, mutual respect, and a sense of belonging. In the management of contractual relationships that involve the establishment of hierarchical relationships, the Group undertakes to ensure that authority is exercised with fairness and fairness and that any form of abuse is avoided: in particular, the Group guarantees that the it does not become an exercise of power that

damages the dignity and autonomy of people. These values must be safeguarded in making choices regarding the organization of work.

### **SAFEGUARDING HEALTH, SAFETY AND THE ENVIRONMENT**

The activities of the Company and the Group must be conducted in accordance with international standards, laws, regulations and national policies relating to the protection of the health and safety of workers and the environment.

The Group's operational management must refer to environmental protection and energy efficiency criteria, pursuing the continuous improvement of health and safety conditions in the workplace and environmental protection.

As part of their duties, Recipients actively participate in the process of risk prevention, health and safety in the workplace and environmental protection, each contributing their part to sustainable development, making an effort to reduce to a minimum the direct and indirect environmental impacts of all activities carried out.

### **PROTECTION OF COMPANY ASSETS**

Each Recipient is responsible for the protection and conservation of the assets and resources entrusted to him/her in carrying out his/her duties. Any use of assets and resources in contrast with the interests of the Company or the Group, or for professional reasons unrelated to the employment relationship with Arca Group, is prohibited.

No employee or collaborator may, or allow others to make improper use of the assets and machinery assigned and/or of the Group's resources.

All equipment and all tools, including IT, provided by the company for the performance of assigned tasks are to be considered work tools, and therefore:

- must be properly safeguarded;
- can be used solely for professional purposes in relation to assigned duties, and in any case in such a way as not to cause any damage, or for illegal purposes unrelated to business operations;
- the consultation and/or storage of files or web contents of an illicit, offensive or discriminatory nature is not permitted.

## **RELATIONS WITH INTERESTED PARTIES**

### **RELATIONS WITH PARTNERS AND SHAREHOLDERS**

Relations with partners and shareholders are governed by the law and the Corporate Statute, with a view to safeguarding the interests of the Parties and all Recipients, in compliance with the values of this Code of Ethics.

### **RELATIONS WITH PERSONNEL**

Personnel employed at Arca Etichette and the Group's companies are required to be fully aware of the Code of Ethics and the principles contained therein, as well as to keep up-to-date on any subsequent adaptations. The Company undertakes to provide training and information on the Code of Ethics to all employees.

In carrying out their work, employees are required to comply with current legislation, the National Collective

Labor Agreement and the principles referred to in this Code of Ethics. Staff have the right and duty to consult with their manager for any clarifications regarding the interpretation and correct application of the principles of the Code of Ethics.

A Recipient who reports illegal conduct or, in any case, behavior that is contrary to the Code, of which he/she has become aware due to his/her relations within the Group, cannot be discriminated and sanctioned in any way; in managing such reports, the confidentiality of the Recipient's identity must be guaranteed.

No form of discrimination or favoritism is allowed on the basis of membership to trade unions, associations and political parties, nor to one's profession or political, party or religious beliefs.

All employees have the right to choose the trade union organization they wish to join, on the basis of their needs, beliefs, ideologies, and in accordance with the laws in force.

### **RELATIONS BETWEEN GROUP COMPANIES**

Arca Etichette manages relations with Group companies in full compliance with laws and regulations in force, and in accordance with the principles set out in this document, paying particular attention to the management of intra-group transactions. The circulation of information within the Group takes place in accordance with the principles of truthfulness, completeness, clarity and congruity, respecting the autonomy of each company and specific areas of activity.

Relations between individual interested parties of Arca Etichette, including in relations with the interested parties of other Group companies, must be based on the criteria and behavior of honesty, correctness, collaboration, loyalty and mutual respect.

### **RELATIONS WITH CUSTOMERS**

Customer satisfaction is the ultimate Group's goal, pursuing business success by offering quality products and services at competitive conditions. The Group's business policy aims to ensure the quality of raw materials used in production processes, the reliability and safety of processes and products and processing conditions, in full compliance with laws, regulations and shared values.

Customer relations are inspired by the principles of good faith and loyal cooperation: No misleading conduct is permitted, which can in any way mislead customers regarding their technical and economic evaluation of the products provided.

### **RELATIONS WITH SUPPLIERS**

Suppliers are chosen on the assumption of sharing the principles contained in this Code of Ethics, which the Suppliers undertake to observe. The primary objective is to promote lasting relationships for the ongoing improvement of performance, in the protection and implementation of the principles of the Code of Ethics, granting equal opportunities to all interested parties, and guaranteeing compliance with the principles of transparency and loyalty, in order to allow maximum participation and competition between all concerned.

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As for the selection of suppliers, purchases of goods and services must also be made in compliance with this Code of Ethics, and are based on the evaluation of objective parameters that guarantee transparency, quality, prices of goods and services, as well as guaranteeing assistance, timeliness and efficiency. In choosing suppliers, special attention is dedicated to verifying their reliability in terms of compliance with current legislation and the rules governing their business activities, including their commitment to environmental and social sustainability.

Suppliers may be required to communicate the characteristics and information, including in terms of health and safety, of the products they supply to the Group, in compliance with current national and international regulations specific to the specific production sector.

Suppliers may be asked to provide the Group with information on the country of origin and on the components contained in the products they supply, so as to be able to verify compliance with applicable laws, including international regulations, in accordance with the supply chain.

Suppliers must therefore maintain reliable information, including any changes, on the origin and composition of the products they supply.

In the event that a supplier adopts conduct that is not in line with the principles of this Code of Ethics, the Company will take appropriate measures, including the termination of existing contracts and the foreclosure of further opportunities for collaboration with the Group.

Buying processes are governed by company procedures that ensure their traceability and transparency. In particular, the remuneration to be paid must be exclusively commensurate with the service indicated in the contract and payments may in no way be made to a person other than the contractual counterpart.

It is explicitly forbidden for Recipients to offer or receive any gifts that may be interpreted as exceeding normal commercial or courtesy practices, or be understood as aimed at acquiring favorable treatment in the conduct of any activity related to the Group.

### **RELATIONS WITH COMPETITORS**

Relations with competitors, whether domestic or abroad, must be loyal, honest and fair. The Group interacts with competitors in such a way as to preserve its resources, the integrity of its rights, human assets, the development of know-how and corporate values.

The Group refrains from engaging in collusive or predatory behaviors or conduct susceptible to any form of abuse.

### **RELATIONS WITH PUBLIC ADMINISTRATION AND PUBLIC INSTITUTIONS**

In relations with the public administration and public institutions, the Recipients must act in compliance with the laws, regulations and the Code of Ethics, i.e. according to the principles of honesty, correctness, loyalty and transparency. It is absolutely forbidden for Recipients to adopt conduct aimed at improperly influencing the decisions of public entities in order to obtain favorable treatment.

All current activities with public administration and public institutions must be documented and traceable, in

order to facilitate auditing and control activities delegated to the Board of Statutory Auditors.

In participating in tenders called by the public administration, anyone acting in the name and on behalf of the Company and the Group must refrain from engaging in conduct in any way aimed at influencing the public entity and orienting its decisions in favor of the Company or the Group.

In particular, illegal payments are strictly prohibited, and practices of corruption, favoritism, collusive behavior, direct and/or indirect solicitations, including through promises of personal advantages, adopted against any person belonging to the public administration or exercising public functions are prohibited.

Commitments undertaken by the Company or Group with public administration and public institutions, including supervisory authorities, are reserved exclusively for the company functions explicitly assigned and authorized to do so and which, in any case, are not in situations of conflict of interest.

## **CONFLICT OF INTEREST**

Any decisions made by Recipients must be motivated by the Group's interests. Arca Etichette undertakes to implement suitable measures to prevent and avoid that Recipients involved in company activities are, or may even appear, to be in conflict of interest, creating conflicts between personal and corporate interests. As part of their work, Recipients must therefore avoid behaviors or decisions that may generate an immediate or deferred advantage for themselves, their family members or acquaintances, to the detriment of the corporate interest.

Recipients must refrain from participating in any activity that could potentially generate a conflict of interest, acting in compliance with the principles of legality, loyalty, correctness and transparency.

In particular, Recipients are required to abstain from having external professional relations with persons that are in a competitive relationship with the Group, or towards whom there is an obligation of neutrality and impartiality; in such cases, timely information must be provided to their direct superiors, while refraining, in the absence of specific indications, from engaging in behavior in conflict of interest.

The Recipients of this Code of Ethics must not engage in any activity that conflicts or is incompatible with the proper fulfillment of their work activities.

## **ANTI-CORRUPTION POLICY and RULES**

The Group adheres to and promotes policies consistent with the laws and standards of legality for preventing corruption, promoting transparency in business relations (hereinafter also Anti-Corruption Laws).

Anti-corruption legislation defines as illegal the promise, offer, payment or acceptance, directly or indirectly, of money or other benefits, for the purpose of obtaining or keeping a business dealing and securing an unfair advantage through the conduct of public or private individuals contrary to professional and/or duties. The Group has a position of absolute intransigence towards any form of abuse of office and corruption, including against personnel of private companies. In carrying out their work activities, all personnel are required to firmly oppose any form of abuse of office and corruption.

In particular, directors, shareholders, employees, collaborators, Company representatives and those of outsourcers in general with whom the Group operates, must not:

- directly or indirectly offer money or other benefits to directors, general managers, managers

responsible for preparing corporate accounting documents, statutory auditors and liquidators subject to the management or monitoring of the aforementioned entities, client or supplier companies, or other bodies or public administration, in order to obtain an interest or advantage of any kind, including obtaining or maintaining business advantages for or on behalf of a Group Company;

- directly or indirectly request or accept money or other benefits from customers, suppliers, or other persons or seek an advantage of any kind in exchange;
- offer, suggest, authorize the offer or payment of money or other benefits in order to induce or remunerate an abuse of office of a function or private activity;
- pay or approve the payment of money or other benefits in order to induce or remunerate an abuse of office of a function or private activity.

## **DONATIONS and SPONSORSHIPS**

Group companies can only make donations and sponsorships that are legal and ethical.

Consequently, if the Company intends to make a donation, the Administrative Department draws up a report containing the list of recipients of the disbursements, highlighting the reference to the overall budget, previously approved for these items.

The report must be sent and approved by the Directors and examined by the Board of Statutory Auditors, where applicable.

No direct or indirect contributions to politicians, political parties or lobby groups are foreseen. If this may occur due to exceptional events, provided they are consistent with the corporate mission, the purposes of common benefit and in line with the code of ethics, these payments are recorded in the aforementioned reports and made public in the corporate documents and on the Group's website.

## **MANAGEMENT OF INFORMATION AND PRIVACY PROTECTION**

### **PROTECTION OF INFORMATION**

Information, data and knowledge acquired, processed or managed during the performance of business activities by Recipients must remain strictly confidential and cannot be disclosed, unless this is required in the execution of legal obligations or requests from public authorities.

In particular, information may not be used or disclosed whose disclosure could prejudice or compromise, even if only potentially, the image, interests and activities of the Group.

Each Recipient is required to make a strictly confidential use of the information and data of which he/she becomes aware in the performance of his/her duties, refraining from making use of such information for the aimed of obtaining personal advantages.

In any case, Recipients must process company information and data with the utmost diligence and attention, and are required to implement appropriate precautions aimed at preventing the information and data from being made accessible to unauthorized parties, both in and out of the workplace.

Such information and data, acquired, processed or managed as part of work activities, or attributable to the company's activities, are the exclusive property of Arca Etichette and, therefore, the Group companies are the only ones that can dispose of such information and data in compliance with the interests of the Group or to

authorize its use by third parties.

## CONFIDENTIALITY AND PROTECTION OF PERSONAL DATA

It is forbidden for any Recipients to process and use information relating to Arca Etichette and Group companies for purposes other than those permitted by law or which go beyond the ordinary performance of their professional duties, for example to pursue private purposes or personal advantages, or those of third parties. It is also forbidden for all Recipients to:

- externally disclose confidential information relating to Group companies;
- issue statements involving the Group's companies, without the prior specific authorization of the department manager as established by company procedures;
- make copies of documents containing company information or remove documents or other archived material or copies of the same from workstations;
- improperly destroy corporate documents and information.

Confidentiality must be observed even after termination of service.

Arca Etichette and the Group's companies make public specific documents to be used in presenting the Group and/or individual companies. These documents must in all cases be used in such a way as to represent the contents in a complete and truthful manner.

All Company documents, e-mails and other materials containing company information are the property of the Company and must be returned to the Company at any time at its request or at the end of the employment relationship.

The Company defines (and periodically updates), in its own interest and that of other Group companies, specific procedures for the protection of confidential information and for the processing of personal data. Arca Group implements the principles and provisions regarding the protection of personal data provided for by European Regulation 679/2016 ("GDPR"), as well as the requirements and guidelines provided from time to time by the Authority for the Protection of Personal Data and the European Data Protection Committee.

The Group has an organizational structure for managing personal data (of employees, collaborators, suppliers, customers, and any other person who enters into a relationship with one of the Group companies) which provides for suitable and preventive security measures for all databases in which personal data are collected and stored, in order to avoid the risk of loss of data, or unauthorized access and processing. In particular, all Recipients are required to strictly comply with the information provided them as authorized to process the personal data of the data subjects and the security measures adopted by the Group to protect data.

Personal data are kept for the period of time strictly necessary in relation to the purposes pursued by the Group and, therefore, destroyed in compliance with the rules set out in the GDPR and the indications specifically provided by the Data Controller.

Lastly, the Group has adopted internal procedures aimed at allowing those concerned by the processing of personal data to exercise their rights, in accordance with the provisions set out in the GDPR.

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## IMPLEMENTATION OF THE CODE OF ETHICS AND PENALTY SYSTEM

Tutti i Destinatari sono tenuti ad apprendere i contenuti del presente Codice Etico e a rispettarne i contenuti.

The Group undertakes to promote and maintain an adequate internal control system in order to ensure compliance with the Code of Ethics and to monitor events or circumstances that could generate violations.

Responsibility for creating and supervising the effective implementation of an internal control system is common to every level of the organizational structure; consequently, all Recipients, within the scope of their functions and responsibilities, are committed to defining and actively participating in the proper functioning of the internal control system.

Compliance with the rules of this Code of Ethics is deemed an essential part of the contractual obligations of all employees pursuant to Art. 2104 of the Italian Civil Code; their violation may give rise to the application of disciplinary sanctions, in compliance with the provisions of the employment contract, and to any other legal consequence.

In order to ensure compliance with the principles contained in the Code of Ethics, specific binding clauses are provided in contracts with suppliers and consultants for compliance with these principles. Thus, the violation of the rules of the Code of Ethics may be deemed a non-fulfillment of contractual obligations, with all legal consequences, including in relation to the eventual termination of the contract and/or assignment and consequent compensation for damages.

Corporate management is required to possess in-depth knowledge of the Code of Ethics and its methods of application. In the event of violation of this Code of Ethics by the Group's top management, the Company's management at a higher hierarchical level will take the necessary measures as quickly as possible, in compliance with current legal and regulatory provisions.

No Recipients have the authority to request or induce violations of this Code of Ethics, and any attempts to do so are subject to immediate disciplinary action, according to the specific protocols adopted by the Group and in compliance with the laws and regulations in force.

### **Reports of non-application and non-compliance with the Principles and Rules of the Code of Ethics**

The Group promotes and ensures the application and compliance with the Code of Ethics through support structures, defined by the Board of Directors. Specifically, any violation of the provisions of the Code of Ethics can be reported by anyone, in writing, to the function responsible for human resources or, if in potential conflict of interest, to the Chairperson or Director of the Group company concerned, who are entrusted with the necessary knowledge and actions, depending on the type of violation found. The Group adopts reporting systems that guarantee the confidentiality and identity of whistleblowers, who in no case may be subjected to disciplinary sanctions.

Riccardo Fadiga  
President of the Board of Directors Arca Etichette S.p.A.



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