

Grazie per aver condiviso l'intero testo. La traduzione professionale e completa del tuo Codice Etico e di Condotta è molto articolata, quindi provvederò a realizzarla in sezioni per garantire chiarezza, precisione legale e coerenza stilistica.

Inizierò con la traduzione delle sezioni 1–5:

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## 1. INTRODUCTION

CIMPLASTA Srl (hereinafter referred to as "CIMPLASTA") believes that ethics are fundamental in business management and that, together with full compliance with the law, they add value to the company. All our activities are carried out in accordance with the ethical values that guide our conduct and with applicable regulations.

For this reason, this Code of Ethics and Conduct (hereinafter, the "Code") has been drawn up with the objective of defining the standards of integrity and fairness that CIMPLASTA has voluntarily chosen to adopt, as a commitment to its stakeholders.

CIMPLASTA commits to adhering to:

- ✓ all requirements of the applicable standard;
- ✓ the Conventions of the International Labour Organization (ILO);
- ✓ the United Nations Convention on the Rights of the Child and the Universal Declaration of Human Rights;
- ✓ all national and international laws on workplace safety, privacy protection, confidentiality, and the processing of personal data;
- ✓ the behavioural standards defined in its own Code of Ethics.

CIMPLASTA considers it proper to comply with these standards not only to concretely demonstrate its duty to respect human rights in every type of process and organization, but also to promote them among its suppliers and partners.

The purpose of implementing this type of management system is to trigger a chain reaction of compliance with these standards by partners, suppliers, and subcontractors, seeking to influence their behaviour and increase their awareness of ethical and social issues.

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## 2. PRINCIPLE OF LEGALITY

The company complies with national, EU, and all other applicable laws and regulations in force in the countries where it operates.

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## 3. OBJECTIVES AND VALUES

The primary objective of the company is the protection of workers and the creation of value for stakeholders (e.g. profits, job retention, etc.). Company strategies are geared toward this purpose.

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## 4. IMPARTIALITY

In decisions affecting relationships with stakeholders, CIMPLASTA avoids any form of discrimination based on nationality, race, health status, sexuality, political opinions, or religious beliefs.

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## 5. CONFIDENTIALITY

**CIMPLASTA ensures the confidentiality of the information in its possession and refrains from seeking confidential data, unless expressly and knowingly authorized.**

**In the case of processing personal and sensitive data, pursuant to EU Regulation 2016/679, CIMPLASTA adopts all necessary precautions and fulfils the legal obligations required.**

Perfetto! Ecco la **traduzione delle sezioni 6–10** del Codice Etico e di Condotta di CIMPLASTA Srl:

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## 6. FAIRNESS IN THE EXERCISE OF AUTHORITY

When establishing and managing contractual relationships involving hierarchical positions—especially with employees—CIMPLASTA ensures that authority is exercised impartially, fairly, and correctly, avoiding all forms of abuse.

In particular, CIMPLASTA guarantees that authority is not used in a way that harms the dignity and autonomy of collaborators or other involved parties, and that organizational decisions respect the value of the people involved.

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## 7. BEHAVIOUR IN CONTRACTUAL RELATIONSHIPS

Contracts and employment agreements must be executed according to the terms freely negotiated by the parties. CIMPLASTA commits to refraining from abusing its contractual position.

In valid contracts, CIMPLASTA does not exploit contractual gaps or unexpected events to renegotiate the agreement solely for the purpose of taking advantage of a position of dependency or weakness of the counterparty.

In drafting contracts, the company ensures that the obligations to be observed under all circumstances are clearly and understandably communicated to the counterparty.

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## 8. POLITICAL CONDUCT

CIMPLASTA commits not to finance any political movement or party, either in Italy or abroad, and does not sponsor congresses or political propaganda events.

However, it may cooperate, including financially, with such entities for specific projects, provided the following conditions are met:

- the project must align with CIMPLASTA's corporate purpose;
- the allocation of resources must be clear and verifiable.

Except in the cases mentioned above, the company may respond to requests for contributions only from nonprofit entities or associations with a formal charter and incorporation act.

Sponsorships may concern social, environmental, cultural, sports, or arts topics, and are limited to events that guarantee quality or to projects where the company can constructively contribute its experience.

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## 9. UNFAIR COMPETITION

CIMPLASTA believes in free enterprise and seeks to compete ethically within the boundaries of competition laws. Recipients of this Code comply with such laws and, accordingly, do not enter into agreements or arrangements with competitors that may be considered anti-competitive, nor do they engage in conduct that violates the principles of a free market.

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## 10. ANTI-MONEY LAUNDERING

CIMPLASTA takes all reasonable and practical actions to avoid any form of money laundering and the financing of criminal activities such as terrorism.

The company aims to conduct business only with reputable individuals and entities engaged in legitimate activities and whose funds derive from legal sources.

Therefore, before establishing any business relationship, CIMPLASTA makes every effort to gather information about potential partners and, in good faith, verify the legitimacy of their activities.

Ecco la **traduzione in inglese delle sezioni 11–15** del Codice Etico e di Condotta di CIMPLASTA Srl:

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## 11. CONFLICTS OF INTEREST

CIMPLASTA recognizes that its employees may engage in industrial, financial, or commercial activities outside of their work duties; however, these activities must remain within the limits of the law and employment contracts and must not conflict with their responsibilities as CIMPLASTA employees.

In performing their professional duties, all recipients must act so that every decision is made in the best interest of CIMPLASTA, without being influenced by personal interests or relationships.

Any actual or potential conflict of interest must be disclosed in advance to the Ethical Management System Officer.

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## 12. BEHAVIOUR TOWARDS INSTITUTIONAL BODIES

All interactions with national or international institutions must be limited to forms of communication aimed at evaluating the implications of legislative or administrative activities concerning CIMPLASTA.

Specifically, all interactions with public service representatives must be handled exclusively by designated individuals who have received an explicit mandate from the company.

These representatives must act with loyalty and fairness and always in respect of public institutions.

In dealings with Public Administration, it is strictly forbidden to offer gifts or money to public officials, employees, or their relatives—whether in Italy or abroad.

CIMPLASTA considers as corruption both illicit payments made directly by entities or their employees and those made through third parties acting on their behalf, in Italy or abroad.

It is forbidden to offer and/or accept any item, service, performance, or favour to obtain or secure preferential treatment in any relationship with public bodies.

During business negotiations or relationships with public institutions, the following actions are prohibited:

- Proposing or evaluating business or employment opportunities that would personally benefit public officials;
- Offering or providing gifts of any kind;
- Requesting or obtaining confidential information that may compromise the integrity or reputation of either party.

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### 13. ENVIRONMENTAL CONDUCT

The environment is a primary asset that CIMPLASTA is committed to protecting. It conducts its activities in full compliance with environmental laws and regulations and promotes the sustainable use of natural resources. In its strategic planning, CIMPLASTA always considers environmental issues and aims to limit negative impacts—such as pollution, emissions, and waste generation—caused by its operations. Each recipient, within the scope of their duties, is required to strictly observe all applicable environmental laws and corporate guidelines, and to adopt stricter criteria wherever possible.

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### 14. HEALTH AND SAFETY CONDUCT

CIMPLASTA strives to achieve the highest possible safety level—defined as the absence of accidents and the prevention of occupational diseases—for its employees and those of its suppliers. To this end, compliance with all Italian and European health and safety legislation is deemed essential. CIMPLASTA is aware that workplace safety can only be achieved through continuous risk assessment, behavioural monitoring, preventive measures, and a control system involving all employees.

Recipients are required to contribute to maintaining safe working conditions for themselves and others by:

- Strictly complying with all applicable health, hygiene, and safety laws and internal rules;
- Avoiding hazardous situations and behaviour;
- Participating in training sessions;
- Wearing appropriate personal protective equipment when required.

Any form of coercion or threat to force staff into violating the law or this Code will not be tolerated.

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### 15. PROTECTION AND DEVELOPMENT OF HUMAN RESOURCES

Human resources are considered a primary asset for achieving CIMPLASTA's objectives, due to the professional contributions made within a relationship based on loyalty, fairness, and mutual trust.

The company protects and promotes the value of its people by encouraging their professional growth, preventing discrimination, ensuring equal opportunities, and providing working conditions that respect individual dignity, health, and safety, in full compliance with current regulations and workers' rights.

Relationships between all hierarchical levels must be based on loyalty, fairness, and correctness, following the principles stated above.

Ecco la **traduzione in inglese delle sezioni 16–20** del Codice Etico e di Condotta di CIMPLASTA Srl:

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## **16. COMPETITION**

The company is committed to complying with current regulations on fair competition and antitrust laws.

CIMPLASTA refrains from any collusive behaviour or abuse of dominant position and fully and scrupulously observes antitrust regulations and the directives of regulatory market authorities.

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## **17. COMMERCIAL COURTESY ACTS**

Any act of commercial courtesy—whether it be a gift, donation, benefit, or any other favour—is permitted only when it cannot be interpreted as aimed at gaining an improper advantage.

Recipients of gifts or benefits that exceed normal standards of courtesy must promptly inform their designated manager.

Regardless of this reporting obligation, such individuals must refuse any promise or offer of undue benefit, whether addressed to themselves or to their family members.

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## **18. CHILD AND YOUNG WORKERS**

CIMPLASTA commits to not employing individuals under the age of 18.

CIMPLASTA also pledges not to assign young workers (under 18) to unhealthy or hazardous environments, or to engage them during school hours.

The company ensures that no child labour is involved in the production of any product or the delivery of any service. Child labour refers to work performed by individuals under the age of 15 that prevents school attendance or an age-appropriate existence.

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## **19. FORCED AND COMPULSORY LABOUR**

CIMPLASTA condemns, refrains from, and does not support any form of human trafficking.

The company is committed to not employing anyone against their will or anyone not free to terminate their

employment contract.

CIMPLASTA will not employ involuntary workers (e.g., prisoners, individuals in debt to the company) or workers who suffer illegal restrictions on their freedom to resign (e.g., confiscation of documents, withheld salaries as deposit), or those not protected by a proper employment contract.

CIMPLASTA especially commits to not using undeclared (black market) labour and to fully respecting workers' legal rights to leave and permits.

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## 20. FREEDOM OF ASSOCIATION

CIMPLASTA guarantees not to prohibit, hinder, or penalize union activities, ensuring employees the appropriate conditions to exercise this right in the workplace.

The company commits to allowing employees to engage in free and lawful collective bargaining without fear.

CIMPLASTA guarantees the freedom to join a union, refrains from applying pressure on those who do, and avoids discrimination in job duties or career progression based on union affiliation.

It recognizes elected union representatives as privileged interlocutors, granting them the necessary time and space to carry out union activities.

Perfetto, ecco la **traduzione in inglese delle sezioni 21–26** del Codice Etico e di Condotta di CIMPLASTA Srl:

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## 21. NON-DISCRIMINATION

The company is committed to guaranteeing equal opportunities for all employees: selecting personnel based on skills and competencies, and treating all workers equally by offering the same chances and conditions regarding hiring, pay, training, promotion, termination, and retirement.

The company undertakes not to engage in or support any discrimination based on race, class, nationality, religion, disability, gender, sexual orientation, union or political affiliation.

The organization does not allow threatening, offensive, exploitative, or sexually coercive behaviours.

CIMPLASTA will not obstruct employees in exercising their personal rights to follow principles or practices or to fulfil needs related to race, class, nationality, religion, disability, gender, sexual orientation, union or political affiliation.

The company is committed to not tolerating behaviours—including gestures, language, or physical contact—that could be deemed sexually coercive, threatening, offensive, or exploitative.

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## 22. DISCIPLINARY PRACTICES

CIMPLASTA is committed to not imposing disciplinary actions that violate workers' dignity or respect. Disciplinary measures will be strictly limited to those allowed by current law.

The company ensures that all workers are treated with dignity and respect, and it strictly prohibits any form of corporal or degrading disciplinary practice.

Suppliers must ensure that their disciplinary procedures comply with all applicable local labour laws and regulations.

CIMPLASTA takes care to prevent psychological abuse or sexual harassment—such as verbal or non-verbal coercion or threats—and does not use poor working conditions as a punitive tool.

The company also avoids implementing disciplinary measures hastily or simplistically.

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## **23. WORKING HOURS**

The company undertakes not to require more than 40 hours of work per week or more than 8 hours of overtime, which must always be agreed upon with the worker.

CIMPLASTA avoids the habitual use of overtime.

Working hours must comply with the national collective labour agreement, and overtime, when necessary, must be properly compensated and not exceed 8 hours per week.

Careful scheduling and efficient production planning are crucial to avoid excessive overtime and to ensure that employees are able to take their legally mandated leave.

Employees must in any case be guaranteed at least one rest day every seven days.

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## **24. REMUNERATION**

CIMPLASTA is committed to not paying wages lower than the legal minimum and to ensuring a wage that supports a dignified life.

The company guarantees remuneration that complies with all applicable local laws—including minimum wage laws—and enables workers to maintain a decent standard of living.

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## **25. SUPPLIERS**

CIMPLASTA ensures that relationships with clients and suppliers are conducted in accordance with the law and the general principles of this Code of Conduct.

In particular, customer relationships must be based on fairness, courtesy, and helpfulness.

Supplier selection processes must be based on objective competitive comparison, avoiding favouritism and/or discrimination.

Through this Code of Ethics, CIMPLASTA establishes the minimum requirements that its organization must comply with.

Suppliers are expected to align their management practices with the principles of the SA8000 standard, which is a preferred condition for maintaining and strengthening relationships with CIMPLASTA.

Where stipulated by contract, CIMPLASTA may request suppliers to:

- Provide all stakeholders with evidence demonstrating compliance with the SA8000 standard;
- Allow access to their premises—upon agreement and proper planning—for audits of compliance with the standard;
- Require their own suppliers to agree to the above conditions.



Regarding supplier oversight, CIMPLASTA commits to:

- ✓ Conducting second-party audits on high-risk suppliers if no third-party audit results are available;
- ✓ Raising awareness of and encouraging adherence to the SA8000 standard among its suppliers, fostering a culture of social responsibility to make all efforts in this area more effective and efficient;
- ✓ Maintaining accurate and comprehensive records on ethical practices with all suppliers engaged in ongoing relationships.

## 26. IMPLEMENTATION MECHANISMS AND REMEDIAL ACTIONS

Any report of potential violations of this Code must be submitted to Management.

CIMPLASTA guarantees that no employee shall face retaliation, inconvenience, or discrimination of any kind for reporting violations of the Code of Ethics.

Following a report, the company will promptly carry out investigations and adopt appropriate corrective actions. Violations of the principles outlined in this Code compromise the trust relationship between CIMPLASTA Srl and its directors, employees, collaborators, and suppliers, and will be promptly addressed with suitable disciplinary or contractual measures.

Non-compliance may result in termination of contract. To protect its image and resources, CIMPLASTA avoids doing business with parties who do not act in accordance with the law and with the principles of this Code.

Management is responsible for investigating any reports of Code violations, reviewing documentation, analyzing data, and recommending updates to the Code based on reported issues.

CIMPLASTA Srl is committed to distributing the Code to all applicable parties.

To this end, it provides specific training and information sessions to ensure that the contents of the Code are understandable and applicable in day-to-day operations.

Violations by employees may result in disciplinary measures in line with applicable laws and labour contracts.

Violations by third parties may result in CIMPLASTA requesting corrective plans; repeated violations or refusal to comply may lead to termination of the business relationship.

CIMPLASTA provides reporting channels that protect the confidentiality of whistleblowers' identities.

Reports should be submitted to Management, which will handle them according to internal procedures.

CIMPLASTA Srl guarantees, within the limits of the law, the anonymity of whistleblowers and does not tolerate any form of retaliation or discrimination against anyone who reports a violation in good faith.

**Management**



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