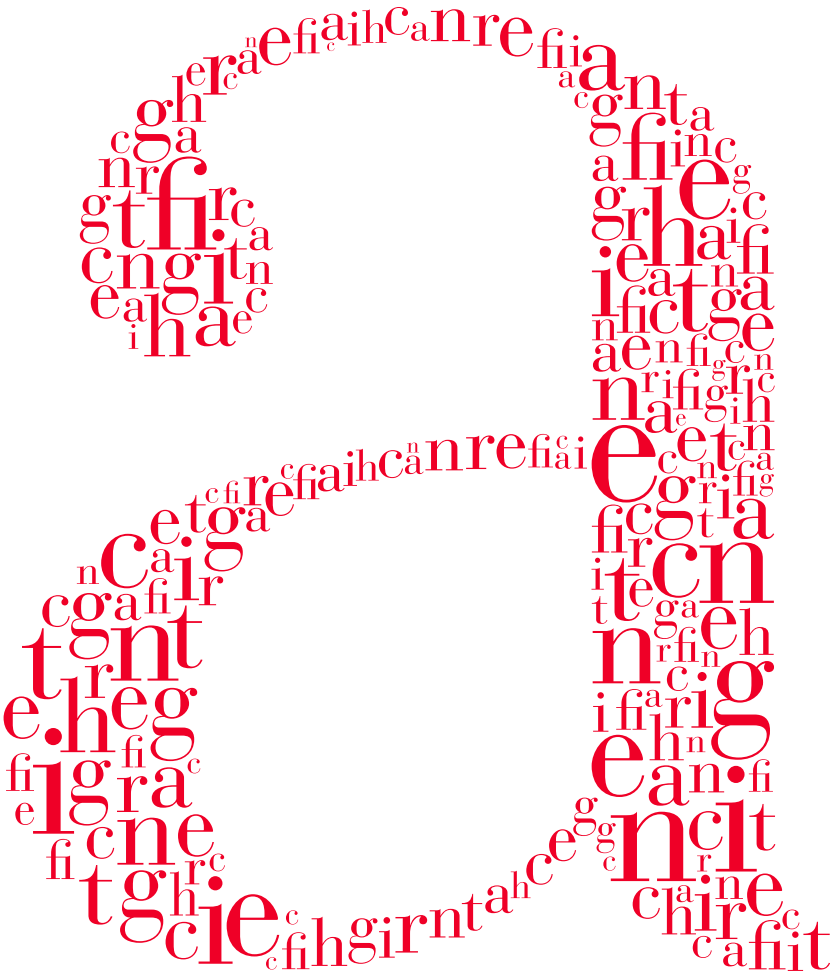
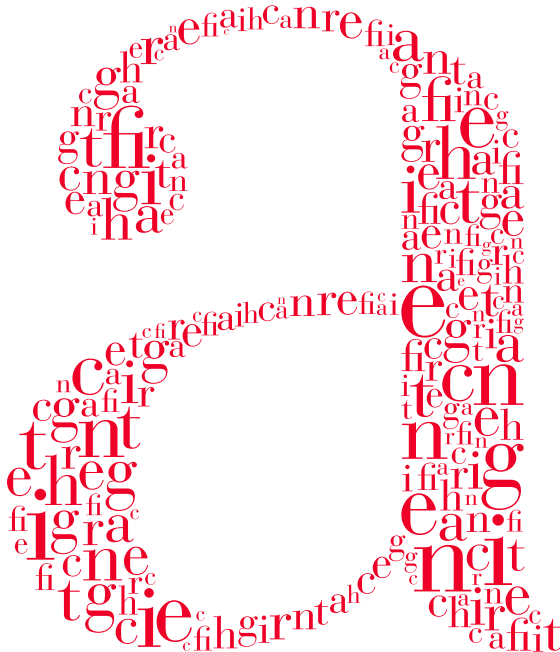


grafiche
antiga



Code of Ethics

Code of Ethics of Grafiche Antiga





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Part 1

Introduction



1. INTRODUCTION

1.1. Company overview and adoption of the code of ethics

GRAFICHE ANTIGA S.P.A. stays true to its origins but also adopts a forward-looking vision. Building strong ties with the territory whilst also seizing the opportunities of market internationalisation. Merging cutting-edge technology with distinctly artisan-like attention to detail. These are but some of the challenges faced by the Antiga brothers over the course of 50 years of business.

An entrepreneurial reality that has carved out a leading position over the years thanks to successful decision-making.

One such example is the choice to invest in innovation and experimentation which, nevertheless, has never diverted the company's focus from the primary factor: human capital. Thanks to its people - a team of over 200 collaborators - the company has scaled the ranks of high-quality printing. The preference for fine workmanship, the human dimension and environmental sustainability - involving significant investments in photovoltaic energy - makes Grafiche Antiga a certified green company.

Growth is pursued without losing sight of the original ambition: to achieve excellence by blending creativity and know-how. An ideal synthesis of the "Made in Italy" approach.

The Company has always acted with integrity, not only by complying with regulations but also by fostering the moral values that are essential to any organisation that intends to operate with integrity, fairness, loyalty and transparency.

Operating with integrity means complying with the laws and regulations in force and abiding by the rules established in company policies and procedures and this Code of Ethics.

In line with the principles above, the Company has developed a quality management system (certified by the independent body Accredia) that meets the requirements of UNI EN ISO 9001, as well as an environmental management system that meets the requirements of UNI EN ISO 14001, thus obtaining the Chain of Custody (COC) certification pursuant to the FSC STD-40-004 standard.

In this perspective, the Company adheres to the principles of Legislative Decree 231/2001, as amended, and has therefore adopted an Organisation, Management and Control Model, which finds its highest expression in the Code of Ethics, which is itself an integral part of the Model.

The purpose of the Code of Ethics is to clearly define a set of principles and values which the Company shares and fosters and, consequently, the conduct that is expected of directors, employees and associates and, more generally, of any person who acts on behalf of or in the name of the Company.

1.2. Recipients of the Code of Ethics

The Code of Ethics applies to the corporate bodies and their members, to executives and all Company employees and to all those who, permanently or temporarily, have a direct or indirect relationship with the Company or are involved in the furtherance of its objectives.

Recipients shall adequately inform third parties of the need to abide by the requirements of the Code of Ethics and shall take the appropriate actions in the event of non-compliance.

1.3. Our principles

The Company's main objective is to maintain the standards of excellence achieved in its sector of operation. The Company tends towards continuous improvement with a view to progressively developing its activity and increasing its visibility and presence in national and international markets. It strives to achieve a balance

between staying competitive on the market, ensuring compliance with competition laws and promoting, from the perspective of social responsibility and environmental protection, a proper and efficient use of resources.

The Company is convinced that an ethical approach to business is of fundamental importance for the proper functioning and the credibility of the business for its shareholders, customers and suppliers and, more generally, for the economic and social context in which it operates.

1.4. Structure of the Code of Ethics

This Code Of Ethics comprises:

- the values and general principles that underpin the Company's relations and business activity;
- the rules of conduct, which include guidelines and rules to be observed by the Company and the Recipients in order to ensure compliance with those same values and general principles and to prevent the risk of unethical behaviour;
- the implementation procedures, which describe the system of controls adopted to improve and monitor compliance with the Code of Ethics.

Part 2

Ethical Principles



2. ETHICAL PRINCIPLES

2.1. Principle of legality

The fundamental principle for all Recipients of the Code of Ethics is to abide by national and international laws and regulations, the national collective labour agreement (CCNL), the Articles of Association, the internal regulations and the Code of Ethics.

The Company implements an appropriate programme of training and awareness raising on the need to comply with laws and regulations and the Code of Ethics. The Company and its employees have fostered a number of corporate values that constitute the application model of the Code of Ethics (integrity, responsibility, speed and flexibility, reliability and teamwork) and supplement the its principles.

2.2. Fairness and responsibility

The furtherance of the Company's interests will never justify any conduct that is contrary to the principles of fairness and responsibility.

The actions, operations and behaviours of those operating within or on behalf of the Company must be guided, in formal and substantial terms, by the principles of legitimacy, protection of the Company, fairness and responsibility.

In all internal and external dealings, Recipients shall behave responsibly and shall refrain from pursuing their own ends or company interests in breach of the rules of law and of the Code of Ethics.

2.3. Integrity and transparency

In accordance with the principle of good faith, Recipients shall act with integrity and impartiality in the exercise of their duties, ensuring the independence of their

judgement and the absence of any commercial or financial interest that might result in bias, preferential or unequal treatment.

In relations with all counterparties, any form of discrimination based on age, race and ethnicity, nationality, political views, religion, gender and health status is prohibited.

The Company considers the completeness, accuracy and veracity of information provided internally and externally to be essential to the life of the Company.

2.4. Confidentiality

Each Recipient shall ensure, in accordance with the provisions of law, the confidentiality of information in its possession, including following the termination of the employment relationship, in accordance with the current privacy and data security regulations.

It is prohibited for Recipients to use confidential information for purposes unrelated to their professional activity. More specifically, information, data and details that are acquired and processed by the Recipients in the course of their work must be kept strictly confidential and protected accordingly, and must be not be used, communicated or disclosed, within or outside the Company, except in compliance with the applicable regulations and the current company procedures.

2.5. Conflicts of interest

The Recipients of the Code of Ethics shall avoid all situations and activities in which there is a conflict of interest between their personal economic activities and their role within the department in which they work.

2.6. Sustainability

The Company is aware of the influence that its activities can have on the general welfare of the community. The Company is committed to seeking a continuous

balance between economic development, social welfare, respect for the environment and risk prevention.

In particular, the Company considers issues related to safety and the environment to be of high importance and duly takes into account the health and safety of workers and the protection of the environment when managing all of its business activities.

The environment is an important community asset which the Company is committed to protecting. To this end, the Company has adopted an environmental management system that meets the requirements of UNI EN ISO 14001. The environmental management system enables the Company to schedule, implement and monitor its activities by striking a balance between economic and environmental needs, in accordance with the applicable laws and regulations, and by ensuring full cooperation with the public bodies responsible for monitoring and protecting the environment.

In recognising that respect for the territory and research and technological innovation are compatible values, the Company, maintaining consistency with its own environmental protection values, has installed a photovoltaic system that supplies part of the energy used in the business activity, thus making a tangible contribution to reducing CO₂ emissions.

In addition, the Company contributes to responsible forest management through the Chain of Custody (COC) certification, which guarantees, for FSC® certified products, the traceability of materials harvested from FSC® certified forests.

2.7. Rejection of all forms of terrorism, subversion and criminal activity

The Company rejects all forms of terrorism, subversion of the democratic process or criminal activity. It therefore adopts appropriate measures to prevent the risk of involvement in acts of terrorisms, subversion or organised crime.

To this end, the Company does not form any kind of working or trade relationships with individuals or legal entities that are involved in acts of terrorism, subversion of the democratic process or organised crime, nor does it finance or facilitate any of their activities.

2.8. Product safety

The Company pursues its mission by offering quality products that comply with the mandatory provisions of law, adopting all the measures necessary to ensure the safety of the products for consumers.

2.9. Separation of roles and powers

The Company has developed an organisational system based on the separation of roles and powers, whereby no single person has full control over an entire process. The operating procedures are described in the relevant internal procedures.

2.10. Competition

The Company recognises competition as a value and operates on the market in accordance with the principle of fair competition.

Part 3

Specific rules of conduct



3. SPECIFIC RULES OF CONDUCT

3.1. Rules of conduct with regard to Recipients

3.1.1. Development of human resources

The Company recognises that human resources are a key factor of primary importance in the growth of the Company. The management of human resources is based on respecting the personality and professional capabilities of each staff member.

The Company ensures equal opportunities for all Recipients based on their professional qualifications and individual abilities, without any form of discrimination based on age, religion, ethnic or geographical origin, sexual orientation, political beliefs or trade union membership and avoiding all forms of preferential treatment or patronage.

3.1.2. Positive working environment

The Company strives to create and encourage a positive work environment in which the freedom, dignity and inviolability of the person is ensured, as well as fairness in interpersonal relationships so as to enable all Recipients to work to best of their abilities. The working environment is built on mutual cooperation, a sense of belonging and respect for the personality of each individual, without prejudice, intimidation or unlawful pressure. Any form of abuse of power in managing hierarchical relationships is prohibited.

3.1.3. Employment relationships

At the time of hiring, each worker receives detailed information concerning the tasks and activities to be carried out, the contractual aspects of the employment relationship, the applicable regulations, the provisions of the Code of Ethics and

the organisation Model and the conduct required to appropriately manage risks linked to the business activity and to the health and safety of workers. All forms of undeclared work are prohibited, for the Company and its subsidiaries and for its suppliers and associates.

3.1.4. Rules of conduct

All Recipients shall act in good faith in order to meet the obligations of their employment contract and comply with the provisions of the Code of Ethics, fulfilling the tasks requested and satisfying the obligations undertaken.

Recipients undertake to observe the highest standards of quality and safety and to act with fairness and transparency in carrying out their duties, in compliance with the provisions of the Code of Ethics and the organisation Model and in observance of the procedures and operating instructions adopted by the Company.

3.1.5. Gratuities and benefits

Recipients must not offer or accept gifts, gratuities or similar benefits, except those offered or accepted as a matter of normal courtesy and only if of modest value. Any Recipient who receives an offer of benefits from a supplier must immediately refer the matter to management.

3.1.6. Information management

All Recipients shall ensure, in accordance with the applicable regulations, the confidentiality of information in their possession, including following the termination of the relationship, in compliance with the current privacy and data security regulations.

It is prohibited for Recipients to use confidential information for purposes unrelated to their professional activity.

More specifically, information, data and details that are acquired and processed by the Recipients in the course of their work must be kept strictly confidential and protected accordingly, and must not be used, communicated or disclosed, within or outside the Company, except in compliance with applicable regulations and current company procedures.

By way of example, confidential information includes but is not limited to: work projects including commercial, business and strategic plans, information concerning know-how and technological processes, financial transactions, operational strategies, market and investment strategies, operating results, employees' personal data and lists of customers, suppliers and associates. Particular emphasis is placed on the need to respect and protect the confidential information of our customers.

In addition, and pursuant to data protection regulations, the Recipients undertake to protect the information generated or acquired by them and to avoid all forms of improper or unauthorised use.

3.1.7. Non-compete obligation

The Company recognises and respects the right of the Recipients to engage in activities and business that is unrelated to the work carried out in the interest of the Company, provided that these are lawful and compatible with their obligations towards the Company. Nevertheless, Recipients shall refrain from any activity that, even potentially, competes with or is in conflict of interest with the Company.

3.2. Rules of conduct with regard to Suppliers

Relations with Suppliers, including relations of a financial and advisory nature, are subject to the principles of this Code of Ethics and are closely and constantly monitored by the Company.

The Company only uses Suppliers that operate in compliance with laws in force and in accordance with the provisions of the Code of Ethics and the Supplier's Code of Conduct, the knowledge and observance of which are an express contractual obligation of each Supplier.

The selection of Suppliers and the agreement of the purchase conditions are based on formal procedures and on the objective assessment of the quality and price of the products and services offered and the ability to supply and guar-

antee the timely delivery of services and products of a level appropriate to the Company's needs, including as regards certification and their general and specific suitability for the intended purpose.

With reference to works or services contracts, the technical and professional expertise of the supplier is verified in order to comply with the legal requirements of the provisions governing health and safety at work, pension contributions and taxes.

3.3. Rules of conduct with regard to Customers

In relations with Customers, the Company ensures fairness and transparency in business negotiations and in its commitment to contractual obligations and the proper and diligent fulfilment thereof, ensuring that the products and services supplied satisfy the characteristics and quality promised to customers.

In their dealings with Customers, the Recipients of the Code of Ethics shall apply conditions appropriate to each type of Customer, reserving the same treatment to similar groups of Customers in accordance with the applicable protocols and procedures.

3.4. Rules of conduct with regard to Consumers

The Company's activities are oriented towards satisfying and safeguarding its Consumers, with due attention given to any requests that might lead to an improvement in the quality of the products and services supplied.

The Company is committed to respecting the right of Consumers to receive products that do not endanger their health and physical integrity and to receive complete information on the products offered.

The quality and safety of the products is constantly monitored and improved and is subject to continual innovation through ongoing Research & Development.

3.5. Rules of conduct in dealing with the Public Administration

3.5.1. Legality, fairness and transparency in dealings with the Public Administration

In relations with the Public Administration, the Company observes the highest standards of transparency, fairness and legality.

To this end, the Company avoids entrusting the management of different relationships with the Public Administration to a single individual, on the assumption that assigning this responsibility to different people and functions minimises the risk of enabling interpersonal relationships that are inconsistent with the Company's aims.

3.5.2. Gratuities and benefits

The Company condemns any conduct, on part of any person, which directly or indirectly involves promising or offering gratuities and benefits (cash, gifts, discounts, services, favours or other benefits) to public officials and/or providers of a public service, including their relatives, from which an undue or illicit benefit and/or advantage may be obtained.

Gifts, acts of courtesy and hospitality towards representatives of the Public Administration are not permitted.

3.5.3. Loans, contributions and subsidies

All applications made to public, national or EU bodies for disbursements, contributions, loans, relief must be made in compliance with the applicable regulations and, in particular, in accordance with the principles of separation of duties, record-keeping and accuracy of the documentation.

To this end, commitments towards Public Administration offices and public Institutions shall be made solely and exclusively by the authorised competent functions, which shall act in accordance with the applicable laws, the Code of Ethics and the protocols of the organisation Model.

3.6. Other counterparts

In addition to the relationships considered above, the Company has defined the following rules of conduct with regard to dealings with other persons or entities.

3.6.1. Market and competition

The Company is in favour of ensuring the maximum level of competition on the market and therefore develops its commercial policy in full compliance with the applicable competition laws and regulations.

The Company believes in free and fair competition and its practices are geared towards achieving competitive results that reward ability, experience and efficiency. Any practice intended to distort the conditions of fair competition is contrary to company policy and forbidden for all persons representing the Company.

The Company has the necessary measures in place to combat money laundering, the handling of stolen goods and the use of money, goods or benefits of illicit origin. In any event, Recipients are required to adhere to and apply the Italian and EU anti-money laundering legislation and to report any situation that might constitute an offence of this nature to the competent authorities.

3.6.2. Political organisations and trade unions

Any dealings with political organisations and trade unions are handled only by the company functions having the authority to enter into and manage these types of relationships, in accordance with the applicable company procedures.

3.6.3. Media

Information concerning the Company can only be released to the mass-media by the authorised company functions and in accordance with the applicable protocols and procedures. Recipients who receive requests for information or interviews must inform the relevant department and obtain prior authorisation before accepting such requests. In any event, all information and data provided to external users must be truthful, transparent and consistent with the Company's image and strategies.

3.7. Health and safety at work

The Company ensures that the Recipients, in particular its employees and associates, work in an environment providing an adequate level of health and safety protection and safeguarding their physical and psychological integrity, in accordance with applicable laws and regulations.

The Company encourages responsible and safe behaviour and adopts all appropriate safety measures required by technological advancements to guarantee a safe and healthy working environment with the specific aim of preventing manslaughter and serious or very serious unintentional injury caused as result of failure to adhere to the occupational accident prevention and health and safety regulations. The Company is committed to promoting and reinforcing a culture of safety, raising awareness of risks and encouraging responsible conduct on the part of all Recipients.

More specifically, the Company organises appropriate employee training and information campaigns in order to promote responsibility and awareness of Health and Safety issues.

It is expressly prohibited for Recipients to engage in any conduct which, directly or indirectly, constitutes an offence committed in breach of the applicable occupational accident prevention and health and safety regulations.

The Recipients of this Code of Ethics, namely, the Employer and the Employer's delegated or sub-delegated representatives, the Executives, the Prevention and Protection Service Officer, the Officers, the Medical Officer and the employees' safety Representative, all contribute to the risk prevention and health and safety process implemented to protect themselves, their colleagues and third parties, without prejudice to their personal obligations and liability under applicable legislation.

Recipients must observe the provisions and instructions issued to ensure collective and individual protection. Recipients shall use equipment, means of transport and all other work equipment and safety devices in an appropriate manner. Recipients must report any failures in machinery, devices and equipment and any other hazards they become aware of, taking direct action in their area of responsibility in the case of urgency.

3.8. Environmental protection

The environment is an important community asset which the Company is committed to protecting. To this end, the Company has adopted an environmental management system that meets the requirements of UNI EN ISO 14001. The environmental management system enables the Company to schedule, implement and monitor its activities by striking a balance between economic and environmental needs, in accordance with applicable laws and regulations, and by ensuring full cooperation with the public bodies responsible for monitoring and protecting the environment.

The Recipients of this Code of Ethics contribute to the protection of the environment in carrying out their work activities. More specifically, the Recipients take great care to ensure that the applicable regulations are adhered to, that the requirements of the authorisations issued by the Supervisory Authorities are satisfied, that illegal discharges, emissions and spills are avoided and that management processes, including special waste management, are implemented in compliance with the aforesaid regulations and in accordance with company procedures.

3.9. Rules of conduct protecting industry, commerce and copyright

Company trademarks represent the identity of the business. Trademarks are also supported by ensuring the consistency of products and the quality of communications.

The Company is committed to ensuring compliance with the laws governing fair trading and as an essential principle adopts the prohibition imposed by law on marketing products that differ in terms of origin, provenance, quality or quantity, from those stated or agreed.

The Company is also committed to ensuring compliance with the legislation protecting trademarks, patents, copyright, industrial designs and other distinctive signs, and the observance of the applicable copyright law.

The Company's logos and identifying marks (especially the Company's letterhead) must be used appropriately and in a manner consistent with the Company's needs and interests.

3.10. Rules of conduct with regard to processing personal data and using IT and telecommunication systems

3.10.1. Processing of personal data and information

The Company guarantees that personal data is treated with utmost confidentiality and in accordance with the applicable personal data protection regulations. Specific security measures are observed to prevent the loss of data and unlawful or unauthorised use and access.

Personal data is processed by manual, computerised and telecommunication means, according to logic strictly related to the purposes for which the data are collected and, in any event, in a manner that ensures the security and confidentiality of the data processed.

Information and sensitive data concerning personnel or other persons are collected, processed and stored in accordance with the applicable regulations and procedures.

In detail, each employee undertakes:

- to collect data only when expressly authorised;
- to exercise utmost care when collecting and storing personal data, verifying that the data subject has given prior consent;
- not to disclose personal data or communicate these in any way to unauthorised persons.

To protect the fundamental rights and freedoms and the dignity of the data subjects, the Company always puts security first when choosing, defining and implementing the manual and computerised procedures used to process personal data and confidential information.

3.10.2. Proper use of IT resources and telecommunications

The telephone systems and the systems used to access email accounts, the Internet and the Intranet are the property of the Company. These systems are used to improve performance in the work activities.

Each employee must therefore bear in mind that:

- email accounts and the Internet must be used strictly for legitimate professional purposes at the Company's premises; telephones may be used for mixed purposes, if so authorised;
- all information contained in the IT system is the property of the Company;
- employees are personally responsible for keeping their passwords and ID codes secret and for preventing any unauthorised access to company data and information;
- only software that has been purchased by the Company for its own business purposes must be used on company computers;
- the reproduction or copying of software is strictly prohibited: any collaborator who intentionally or unintentionally copies software material exposes the Company and itself to the risk of serious sanctions;
- unauthorised possession and disclosure of access codes to IT or telecommunication systems and the installation of devices designed to intercept, impede or interrupt communications through IT or telecommunication systems is also strictly prohibited.

Each employee must also:

- strictly observe the Company's security policies in order to avoid compromising the functionalities and the protection of the IT systems;
- refrain from sending e-mail messages that are threatening or insulting, that contain vulgar language or inappropriate remarks that might offend people and/or damage the corporate image;
- refrain from sending e-mail messages that might bind the Company to third parties without having the required authority;
- take good care of the mobile devices assigned to them and avoid giving them to others.

All data and information stored in the Company's IT and telecommunication systems, including e-mail messages, are the property of the Company and must be used exclusively to conduct the business activity in the manners and within the limits established by the same.

3.11. Rules of conduct with regard to financial statements, accounting records and company registers

3.11.1. Accounting records and company registers

The Company condemns any conduct that seeks to alter the accuracy and reliability of the data and information contained in the financial statements or in company reports or in any other corporate communications which the Company is required by law to provide to shareholders, third parties and auditors.

All persons involved in preparing such documents shall verify, with due care, the accuracy of the data and information to be included therein.

The functions tasked with preparing the financial statements and the corporate communications shall perform their duties in accordance with the procedures set out in the organisational Model and in compliance with the principles of fairness and good faith.

Any conduct that aims to damage the integrity of the Company's corporate assets is forbidden.

3.11.2. Accounting transparency

Transparency in accounting is a concept that applies to all employees and managers, regardless of their area of employment. Transparent accounting relies on the veracity, accuracy and completeness of the basic information required for the relative accounting records.

Everyone must therefore cooperate to ensure that business transactions are recorded correctly and in a timely manner in the accounting records.

Documentation evidencing the activities supporting each transaction must be kept on file so as to:

- facilitate bookkeeping;
- identify the various levels of responsibility;
- enable the accurate reconstruction of the transaction.

Each accounting entry should precisely reflect the contents of the supporting documents.

Each employee shall ensure that the documentation can be easily traced and is ordered according to logical criteria.

3.11.3. Bribery involving private individuals

In full observance of the principles above, the Company is committed to preventing and obstructing any form of mismanagement linked to a breach of the principle of sound company management.

To this end, the Company condemns any conduct that seeks to alter the fairness and transparency of commercial relations between the businesses. It specifically prohibits Recipients from offering or promising money or other benefits to directors, general managers, financial reporting officers, executives, auditors and liquidators of other companies as an inducement to carry out or omit an act in violation of the duties of their office and their duty of loyalty, for the purpose of obtaining an advantage for the Company.

3.11.4. Fairness in operations

All operations and transactions, to be understood in the broadest sense of the word, must be authorised and registered in accordance with the principles of fairness, honesty and impartiality. The Recipients of the Code of Ethics must act with due care to ensure that the activities carried out are supported by the required authorisations and the appropriate documentary and/or computerised evidence.

3.12. Rules of conduct with regard to money laundering

The Company recognises the high value of the democratic process and freedom of political opinion. For this reason, it condemns any use of its own resources to finance or carry out actions aimed at furthering terrorist aims or subverting the democratic process.

The Company prohibits any conduct that might constitute or be linked to cross-border organised crime, including mafia-type organisations, money-laundering, handling of stolen goods and using money, assets and other benefits of illicit origin.

To this end, the Company shall commit to checking payments to third parties to ensure that the recipient of the order matches the party collecting the related sums and also verifying that the necessary information regarding the commercial/professional reliability of suppliers, consultants and partners is requested and obtained.

3.13. Rules of conduct with regard to crimes against the person

The Company recognises the primary importance of protecting the safety, freedom and status of individuals. It therefore adopts the most appropriate control and supervisory measures, in accordance with applicable regulations, to prevent any form of unlawful conduct intended to commit a crime against the person and only uses suppliers that adopt the same measures and standards of conduct.

Part 4

Procedures for implementation, control and penalties



4. PROCEDURES FOR IMPLEMENTATION, CONTROL AND PENALTIES

4.1. Communication and training

The Code of Ethics is brought to the attention of the Recipients, both inside and outside the Company, through specific communications.

Inside the Company, the awareness and understanding of the Code of Ethics is ensured by involving all personnel in information and training programmes, which are structured in accordance with the rules set out in the organisation, management and control Model.

It is the responsibility of each employee to consult with their direct manager should they require any clarifications regarding the interpretation or application of the rules of conduct contained in the Code of Ethics.

4.2. Implementation and control

In accordance with the current legislation and with a view to planning and managing company activities in a way that ensures efficiency, fairness, transparency and quality, the Company adopts appropriate organisational and management measures to prevent unlawful conduct or conduct contrary to the rules of this Code of Ethics by any person acting on its behalf. Based on how the activities and the internal organisation is structured, the Company may adopt a system whereby powers and specific tasks are delegated to persons who possess the necessary skills and experience.

The Company adopts and implements an organisation, management and control Model that provides for suitable measures to ensure that activities are carried out

in compliance with the law and this Code of Ethics and to identify and promptly eliminate any situations of risk.

The function responsible for monitoring the application of the Code of Ethics and the Model is the Supervisory Body, which:

- monitors the dissemination of the Code of Ethics and the underlying principles to all Recipients;
- is informed of every breach identified by the corporate bodies and may conduct independent inquiries;
- provides opinions and makes proposals with regard to any required amendments to the Code of Ethics.

4.3. Reporting breaches (Whistleblowing)

To facilitate the identification of all cases of non-compliance with laws and regulations, policies, standards and internal procedures, as well as any other breaches of the Code of Ethics and the Model, the Company has set up appropriate reporting channels for the purpose of receiving and managing reports of non-compliance, with the aim of protecting the integrity of the Company. The Recipients can use these channels to report any significant unlawful conduct pursuant to Legislative Decree 231/01, based on precise and consistent factual evidence, as well as any breaches of the organisation and management Model of which they become aware during the course of their work, with the anonymity of the whistleblower guaranteed (Whistleblowing system).

The Whistleblowing system offers protection to whistleblowers who, in good faith, report unlawful or fraudulent acts by employees, members of corporate bodies and third parties (customers, consultants, associates) to the Supervisory Body.

The Company ensures the confidentiality of the person raising the concern so as to protect the whistleblower from retaliation and/or discrimination.

Incidents can also be reported in anonymous form. The reports should be supported by adequate and ascertainable circumstantial evidence.

In line with the principles above and in compliance with the applicable legal requirements, the Company has set up the following reporting channels, through which whistleblowers can report breaches of the Model, even potential, to the Supervisory Body:

- e-mail address odv.GRAFICHEANTIGA@gmail.com
- postal address or internal mail address: OdV, c/o GRAFICHE ANTIGA S.P.A., Via delle Industrie 1, Crocetta del Montello.

The above is without prejudice to the criminal or disciplinary liability of the whistleblower pursuant to laws in force in cases case of slander and defamation.

Reports made in bad faith or with malicious intent, that are later found to be unfounded, constitute a breach of the Code of Ethics.

All Recipients of the Code of Ethics must:

- refrain from any conduct that is contrary to the provisions of the Code of Ethics;
- request clarifications from their direct superiors or the relevant contact persons or the Supervisory Body should they have any doubts concerning the application of the Code;
- adequately inform any third parties they come into contact with during the course of their work of the existence of the Code of Ethics and of the third party commitments and obligations imposed by the Code;
- demand compliance with any obligations which are directly related to their work activity;
- adopt the appropriate internal measures and, if part of their duties, the appropriate external measures, should any third party fail to adhere to the provisions of the Code of Ethics;
- cooperate with the functions responsible for investigating potential breaches;
- promptly report the commission or attempted commission of any of the offences listed in Legislative Decree 231/2001, or any breach or circumvention of the Code of Ethics, to the Supervisory Body;
- maintain confidentiality with respect to any person who reports unlawful conduct or breaches of the Code of Ethics, punishable by disciplinary action;
- refrain from acts of retaliation or discrimination against the whistleblowers.

4.4. Penalties and Breaches of the Code of Ethics

A breach of the provisions of this Code of Ethics constitutes a disciplinary offence.

All updates of the Code shall be approved by the Company's Board of Directors after consulting with the Supervisory Body, except for minor changes which must in any event be reviewed by the Supervisory Board.

This document can be viewed on the website www.graficheantiga.it.

5. FINAL PROVISIONS

This Code of Ethics was approved by resolution of the Board of Directors on 22.04.2020.

This Code is effective as of 01.06.2020.

It is periodically reviewed and updated.

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antiga

Grafiche Antiga spa
T. (+39 0423 6388
graficheantiga.it

HEADQUARTERS
Via delle Industrie, 1
31035 Crocetta del Montello (TV)

OFFICES
Milano Pordenone
Belluno Vicenza

