



CODE OF ETHICS

adopted by:

Cartiere Paolo Pigna S.p.A.

Registered office: Via D. Pesenti n. 1 Alzano Lombardo (BG)

By resolution of the Board of Directors of 28/03/2019

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Foreward

Cartiere Paolo Pigna S.p.A. is an Italian company, operating in the paper manufacturing and stationery industry. It is a leader in the production of stationery materials for schools, offices and homes, and related stationery items. In over one hundred and fifty years of development, Pigna S.p.A. has forged important partnerships with its customers, bringing innovative solutions, investing in product research and paying the utmost attention to collaboration and service.

In its relations with customers, suppliers and third parties, Cartiere Paolo Pigna S.p.A. (hereinafter referred to as **"Pigna"** or **"the Company"**) is committed to conduct that is always oriented towards the utmost fairness and transparency, through the application of ethical values and rules of conduct that are clear and consistent with the principles underlying its identity.

This Code of Ethics (hereinafter referred to as the **"Code of Ethics"** or the **"Code"**) expresses the commitments undertaken by the directors, employees - whether managers or not - and collaborators of Pigna and its subsidiaries in the running of the company's business and activities.

This Code of Ethics sets out the fundamental principles for the development and growth of Pigna. It serves as a guide for all collaborators and provides suggestions on how to handle sensitive situations that may be encountered on a daily basis, both inside and outside the company.

In addition, the Code of Ethics, in line with the indications provided in this regard by the relevant trade associations and *best practices* (Confindustria), lays down rules of conduct aimed at preventing, according to Italian law, the committing of offences as well as any conduct that conflicts with the values that Pigna seeks to promote.

Pigna believes that the adoption of a set of ethical principles contributes to spreading ethical soundness and integrity throughout the company, both in internal relations and with third parties, strengthening the preventive capacity of the Organisational, Management and Control Model pursuant to Legislative Decree 231/2001 (hereinafter the **"Organisational Model"**), voluntarily adopted by Pigna's Board of Directors, of which this Code of Ethics is an integral part and constitutes an essential element.

Pigna undertakes to ensure a programme of information and awareness of the provisions of this Code and its application to the persons to whom it refers, so that the Directors, Employees and all those who work for the Company may carry out their activities and/or duties in constant and strict compliance with the principles and values contained in this Code.

It is Pigna's task to ensure that the Code is observed and, to this end, to adopt all the necessary instruments of prevention and control.

Recipients and scope of application

The principles and provisions of this Code are illustrative specifications of the general obligations of due diligence, fairness and loyalty which characterise the performance of work and conduct in the workplace. These provisions - and the relative sanctions in the event of non-compliance - apply to all those who, directly or indirectly, permanently or occasionally, work with or for Pigna (hereinafter also **"Recipients"**).

In particular, these provisions are addressed to:

- shareholders, directors and members of Pigna's statutory bodies, and in any case to all those who hold functions of representation, administration and direction, or management and control within the company;

- all employees without exception and therefore also those with managerial status;
- all collaborators subject to the direction or supervision of top management, even on an occasional basis, of Pigna;
 - consultants and anyone who carries out activities on behalf of Pigna.

Recipients are required to be familiar with the provisions contained in the Code and the reference standards governing the activities carried out within the scope of their function, deriving from the law or from internal procedures and regulations.

The Code is brought to the attention of all those with whom Pigna has relations, and in particular its suppliers, by means of a specific reference to the Organisational Model and to the Code contained in the contractual clauses and can be consulted on the company's website. It constitutes a binding document, within the limits of their respective competencies and functions, for all those who act on behalf of the Company.

Our values

In carrying out its activities and, in particular, in its internal and external relations, Pigna conforms to the principles of legality, correctness, integrity and transparency expressed in our legal system and with specific regard to the aims expressed in Legislative Decree 231/2001.

Shareholders, directors, members of statutory bodies, employees and collaborators shall respect this Code and the internal regulations of the Company, including when dealing with third parties; more specifically, they must inform third parties of the content of the Code and internal regulations, in order to demand compliance with their own choices and conduct.

Compliance with regulations

Pigna accepts as an essential principle the observance of the laws, rules, regulations and self-regulation in force in Italy and in the countries in which the company operates in support of its customers.

Any conduct carried out by oneself or in concert with others that constitutes, or may constitute, any type of offence is prohibited, in particular if it is covered by Legislative Decree 231/2001 and subsequent amendments and additions.

Within the scope of their activity, Recipients are therefore required to diligently and rigorously comply with the laws in force, this Code, company procedures, internal regulations and the rules of professional ethics.

Under no circumstances does the belief that one is acting in the interest of Pigna authorise or justify conduct that conflicts with these rules.

Respect for people

The Company acknowledges the central importance of human resources believing that the main factor in the success, growth and development of any business is the professional contribution of the people who work for it, within a framework of loyalty and mutual trust.

The Company therefore ensures respect, including during recruitment, for the integrity and physical and cultural dignity of the person and the consideration of the relationship with others, promoting the enhancement of human resources in order to improve and increase their skills.

In making decisions that affect relations with its stakeholders, the Company undertakes to avoid any discrimination on the basis of age, race, sex, state of health, nationality, political opinions, membership of trade unions and religious beliefs.

Pigna does not tolerate demands or threats aimed at inducing people to act against the law or the Code, or to behave in a way that is detrimental to their moral or personal beliefs and preferences.

Unlawful employment or any other form of exploitation is not permitted.

Respect for competition

Pigna recognises the fundamental importance of a competitive market and strictly complies with the provisions of competition law and refrains from deceptive or collusive behaviour and, more generally, any behaviour that could constitute unfair competition.

In carrying out its activities and, in particular, in its internal and external relations, Pigna complies with the principles of legality, correctness, integrity and transparency.

In no case can the pursuit of the Company's interests justify conduct that is not in line with the above principle.

Pigna trusts in the quality of its products and services and in the ability and employment of its collaborators; it recognises the value of competition in the market and therefore undertakes to compete with operators in the related market, refraining from any form of abuse of a dominant position that could lead to a violation of the principle of fair competition.

Confidentiality

It is Pigna's primary objective to protect the principle of confidentiality of data and information relating to its business activities, ensuring that it is respected and safeguarded by the Recipients, without prejudice to compliance with obligations to inform public authorities that may be provided for by laws and regulations.

Pigna undertakes to implement all data protection and safeguarding requirements by adopting the necessary organisational measures, in compliance with the provisions in force. The Company is therefore equipped with appropriate procedures and tools aimed at achieving an adequate level of security in the management of the company's information assets, in terms of:

- confidentiality - access to information permitted only to authorised persons
- integrity - guarantee of the accuracy and completeness of the information and of the processes of its handling/processing
- availability - accessibility to information by authorised persons when they need it

The obligation of confidentiality therefore extends not only to information concerning the Company, but also to that relating to customers, suppliers, business partners, as well as other parties with whom the Company has relations, involving the use or collection of personal information and data.

With regard to the use and protection of information relating to its customers, the Code of Ethics obliges Recipients to ensure the confidentiality of such information both during their work and after their termination, except for communications required by law. The obligation of confidentiality must also be respected outside working hours and during any periods of suspension of the contract.

The above requirements also apply to directors, statutory auditors and members of management and control bodies, who must promptly inform the company if they find themselves working as managers, consultants, employees and/or members of management and control bodies or in any other relationship of a financial nature with competing companies and/or with customers of Pigna.

Similarly, suppliers, agents and consultants are obliged to inform the Company if they supply to or have a relationship of a financial nature with companies directly competing with Pigna, even if they have signed binding confidentiality clauses in the contracts governing their relations with Pigna.

Conflict of interest

In keeping with the principles of transparency, honesty and fairness, Pigna undertakes to adopt the measures necessary to prevent and avoid conflicts of interest, basing its relations with its collaborators on mutual trust and loyalty, so that every business decision taken on behalf of the company corresponds to its best interests.

The Recipients of this Code of Ethics are required to avoid situations and activities that may cause, even if only theoretically, a conflict of interest between their duties within the company and their personal economic activities. They are also required to avoid all situations that could interfere with their ability to make impartial decisions in the interest of the company and in full compliance with the provisions of this Code.

Behaviour aimed at favouring one's own particular advantage to the detriment of the interests of the company will not be tolerated, nor will the unauthorised personal use of company assets.

Any company representative who, in the course of his or her work, encounters a situation that could lead to a conflict of interest, even if potential, is obliged to inform the Management and the Supervisory body, in order to allow them to adopt any protective measures and, if necessary, to inform Pigna's Board of Directors.

If the conflict of interest, real or potential, involves one of the members of the Board of Directors, the other directors and the Board of Statutory Auditors must also be informed.

If the conflict of interest involves the Managing Director of the Company, he or she must also refrain from carrying out the action subject to the conflict of interest and refer it to the Board of Directors. In such cases, the Board of Directors must adequately justify in its resolutions the reasons and the advantage of said action for the Company.

Corruption

The Recipients of the Code are committed to the highest standards of integrity, honesty and fairness in all relationships within and outside the Company.

The Company will not tolerate any type of corruption with respect to:

- Public Officials or any other party connected or related to Public Officials, in any form or manner, in any relevant jurisdiction, not even in those where such activities are in practice permitted or not judicially prosecuted;
- private individuals linked to Pigna by business or any other relationship, as well as their relatives or relatives-in-law.

Each Recipient is required to deal fairly with his or her counterparts. In particular, it is expressly prohibited to:

- obtain unlawful advantages through deception, dishonest or fraudulent conduct;
- accept and/or make, for oneself or for others, any kind of pressure, recommendation or proposal that may cause damage to Pigna or undue advantages for oneself, for the company or for third parties;
- accept and/or make promises and/or undue offers of money or other benefits;

- accept and/or provide gifts, unless they are of modest value and are not linked to requests of any kind as better specified below.

Internal relations

Relations with shareholders

Pigna ensures that shareholders' rights, including individual rights, are respected. Shareholders need all the information available to guide them in their investment decisions and in corporate resolutions.

In particular, the Company guarantees the exercise of the administrative and patrimonial rights of shareholders, ensuring adequate information and respecting the principle of equal treatment and safeguarding the rights of minority shareholders; it also guarantees the proper exercise of shareholders' rights of access and control.

Pigna undertakes to create and maintain over time the conditions for the widespread and informed participation of shareholders in the decisions for which they are responsible.

The company also endeavors to guarantee economic and financial performance such as to increase the value of the company, adequately remunerating the risk taken by its shareholders through the investment of their capital.

Any favouritism or preferential behaviour towards one or more shareholders is expressly forbidden.

Pigna oversees the correct fulfilment of the disclosure obligations laid down by law, and compliance with the provisions of the law and the articles of association concerning the functioning of the company bodies.

Shareholders' meeting

Pigna guarantees that the persons entitled to participate in the Shareholders' Meeting can exercise their rights to information, control, proposals and vote in an informed and constructive manner.

Specifically, the Company ensures that information is provided in advance of Shareholders' Meetings, in compliance with the legal deadlines for relevant information, and during the course of the meetings, in order to guarantee that the will of the shareholders is correctly expressed.

Board of Directors

The Board of Directors performs its duties with fairness and diligence, devoting the necessary time and effort and paying particular attention to its knowledge of the tasks and responsibilities inherent in its office.

The Board of Directors ensures that adequate information is provided:

- to all its members, with regard to the issues on the agenda
- to the Shareholders' Meeting, in compliance with the law and the Articles of Association.

Relations with employees and collaborators

Pigna protects and promotes the value of its human resources as an essential element in the development and success of a company, aiming to increase and enhance the knowledge capital and skills possessed by each collaborator within the company's organisational context.

Pigna offers equal opportunities to all employees on the basis of their professional qualifications and individual skills, without discrimination, and undertakes to base its recruitment, hiring,

remuneration and management of human resources on merit and competence, in strict compliance with current collective bargaining agreements.

The Company refrains from discriminatory conduct or conduct aimed at favouring candidates recommended by third parties, and in particular those belonging to the Public Administration or customers of Pigna.

In entering into contracts with employees and collaborators, the Company complies with the rules established by the legislation applicable at any given time and by collective bargaining agreements in force.

In managing relations with employees and collaborators, the Company recognises and protects all the rights enjoyed by them, taking into account the characteristics of their employment relationship, their position within the organisation and/or their contractual relationship with Pigna.

Employees and collaborators shall not be required, as a duty to their superiors, to behave in a manner contrary to the provisions of this Code of Ethics.

In the recruitment process, Pigna does not permit the employment of third-country nationals who are not a legal resident.

Protection, updating and training of human resources

Pigna considers its human resources (meaning both employees and collaborators who work for the company under contracts other than employment contracts) to be its fundamental value, in terms of intellectual assets and potential for business growth and development.

The Company, therefore:

- undertakes to ensure that a peaceful working environment is created within the company, in which everyone can work in compliance with the law, and with shared ethical principles and values;
- ensures that its employees and collaborators behave and are treated with dignity and respect, in compliance with the laws in force;
- will not tolerate any form of isolation, exploitation, harassment or discrimination, for personal or work-related reasons, by any manager, employee or collaborator towards another manager, employee or collaborator;
- reiterates its firm opposition to any kind of discrimination based on race, language, colour, faith and religion, political opinion and orientation, nationality, ethnicity, age, sex and sexual orientation, marital status, disability and physical appearance, economic and social condition; likewise, Pigna opposes the granting of privileges for the same reasons.

Pigna believes it is essential to invest in the professionalism of its human resources in order to offer excellent services to its customers and therefore promotes the training of its employees and collaborators. In this context, communication between management and employees and collaborators is of particular importance in order to provide them with the appropriate behavioural guidelines.

Principles of conduct for employees and collaborators

Pigna requires all its employees and collaborators to comply with the principles of professionalism, transparency, fairness and honesty expressed in our regulations, as well as to respect the rules laid down in the Code.

Compliance with the rules of the Code must be considered an essential part of the contractual obligations of the Company's employees, pursuant to and for the purposes of Article 2104 of the Italian Civil Code. Violation of these rules may therefore constitute a breach of the primary obligations of the employment relationship, or a disciplinary offence, with all the consequences of the law, including with regard to the preservation of the employment relationship, and may lead to compensation for damages arising therefrom. Employees are therefore required to:

- adopt the provisions of the Code relating to their specific duties, including by participating in any training activities;
- adopt actions and conduct consistent with the Code and refrain from any conduct that may damage the image of the Company, compromising its reputation;
- comply with all the internal provisions adopted by the Company in order to ensure compliance with the Code or to identify any violations thereof;
- promptly report to the Supervisory Board any news regarding possible violations of the Code;
- actively participate, where required, in audits of the operation of and compliance with the Code.

The Recipients of this Code of Ethics shall avoid any form of association in the performance of their activities that is potentially related and/or functional in any way to the committing of an illegal act or crime.

Use of company assets and resources

Employees and collaborators are required to use company assets and resources, both tangible and intangible, made available to them in accordance with their intended use and in such a way as to protect their preservation and functionality. In the use of corporate assets and resources they are therefore required to act with diligence, through responsible behaviour and in line with the operating procedures prepared by the Company.

Each employee and collaborator is responsible for guarding, preserving and defending the Company's assets and resources entrusted to him/her within the scope of his/her activity, preventing their use by unauthorised third parties, and is required to promptly inform his/her supervisor of their improper use or use that is harmful to the Company's assets.

It is expressly forbidden to use the Company's assets for personal needs or needs unrelated to the employment relationship, for purposes contrary to the law, public order or morality, as well as to commit or induce the committing of crimes or in any case racial hatred, glorification of violence, discriminatory acts or the violation of human rights.

As regards IT tools, it is expressly forbidden to engage in conduct that may damage, alter, deteriorate or destroy the Company's or third parties' IT or telematic systems, programs and data, as well as unlawfully intercept or interrupt IT or telematic communications. It is also forbidden to illegally break into computer systems protected by security measures or to obtain or distribute access codes to protected computer or telematic systems.

To this end, Recipients are required, in particular, to:

- access only the IT resources to which they are authorised;
- keep the credentials and passwords for access to the company network and to the various applications and personal keys according to criteria that prevent their easy identification and improper use;
- comply with internal policies regarding anti-intrusion and anti-virus devices;

- not save in any way on the company client-server models any computer program or executable, even if available free of charge, without having previously contacted the Information Technology manager and obtained his/her written authorisation.

Copyright and Intellectual Property

Pigna prohibits the use of computer or telematic programs without appropriate licenses or on which all legal obligations regarding copyright have not been properly complied with.

The Company and all its collaborators are obliged to comply with the provisions of copyright law, with specific reference to the acquisition, use, storage and distribution of software.

Pigna prohibits the unlawful reproduction, imitation or tampering with trademarks, distinctive signs, patents, industrial designs or models owned by third parties or the use of trademarks, distinctive signs, patents, industrial designs or models counterfeited by third parties. It is also forbidden for employees to violate the intellectual property rights of third parties.

External relations

General principles

The Recipients of the Code are required, in business relations with third parties, to adopt ethical, correct and law-abiding conduct, based on maximum transparency, clarity, fairness and equality.

These principles are valid with reference to the Public Administration or similar bodies, customers, suppliers, consultants, commercial partners and, in general, third parties who have business relations with Pigna or on its behalf.

Consistent with the principles set out in this Code, it is forbidden to make or promise to make payments of money or other benefits to third parties, even indirectly, in order to unduly promote or favour the interests of the Company. It is also forbidden to accept, for oneself or for others, the promise or the giving of money or other benefits to promote or favour the interests of third parties.

Relations with the Public Administration

In its relations with the Public Administration, with bodies that carry out activities of public utility or public interest or in any case involving relations of a public nature, the company adopts the strictest compliance with applicable EU, national and company regulations.

Pigna is committed to ensuring the widest possible collaboration with the Public Administration during possible inspections. In this sense the Recipients are required to promptly provide clear, truthful and transparent information.

Inspections by control authorities (e.g. ASL, INPS, NAS, Labour Inspectorate, "Guardia di Finanza", Fire Brigade, Inland Revenue, etc.) must be managed, for the Company, by authorised persons and conducted in a spirit of collaboration, correctness and transparency, with an absolute prohibition to hinder the regular performance of the inspection activity through concealment or destruction of documentation.

The Company shall provide any requested information in a timely manner, and shall also avoid:

- influencing decisions by promising, offering or granting compensation or other benefits, especially in the entertaining of future relationships of collaboration and/or hiring of family members or relatives;

- taking advantage of any personal or family relationships with officials of the Authorities and Institutional Bodies.

In all cases in which commitments are made to the Public Administration, Pigna is obliged to guarantee maximum traceability, collecting and keeping all documentation useful for reconstructing the procedures followed and the activities carried out.

Relations with persons belonging to the Public Administration must be conducted in compliance with the regulations in force and, in particular, with the provisions of Law 190/2012 on anti-corruption, as well as with Presidential Decree 62/2013 on codes of conduct for public employees. When having any kind of relationship with the Public Administration, Pigna must undertake to ensure that a record is kept of the reasons for the meeting held and that a record of the meeting is drawn up.

Members of corporate bodies, employees and collaborators of Pigna are forbidden to make direct or indirect payments to public officials and/or public administrations in general which are not connected with the provision of services or contracts duly authorised in writing by the company departments responsible for managing these services.

Gifts and acts of courtesy and hospitality towards public subjects are permitted by the Company only when they are of modest value (no more than €50 of perceived value) and in any case such as not to compromise the integrity or reputation of either party and they cannot be interpreted, by an impartial observer, as aimed at acquiring improper advantages.

It is forbidden to recruit employees, collaborators, professionals or to entertain any type of relationship that could be interpreted as aimed at acquiring advantages with persons who have any degree of kinship with officials of the Public Administration or similar who have a relationship with Pigna for reasons of service.

In the production of company documents, the Company prohibits its employees and collaborators from presenting untrue portrayals of facts which could mislead or alter the ability of the Public Administration to analyse them.

It is forbidden to induce anyone, leveraging on one's hierarchical position, with an offer or promise of money or other benefits, not to make statements or to make false statements, if called upon to make statements to the Judicial Authority that may be used in criminal proceedings.

Anyone who is subjected to inappropriate requests by a public official or a representative of the Public Administration, in order to obtain a benefit of any kind and nature in the interest and to the advantage of the Company, is obliged to promptly inform the human resources manager and comply with the instructions scrupulously obtained.

Public funding

In the event that Pigna may benefit from funding of any kind, provided by national and/or EU public bodies, the Company prohibits and opposes any artifice or deception (including through false declarations or omissions) carried out by one of its members by any means whatsoever to obtain, unjustly, such funding, subsidies or benefits from the Public Administration, or to divert their use.

Relations with suppliers and business partners

Pigna intends to use only suppliers who operate in compliance with current legislation and the rules laid down in this Code.

The selection of suppliers and commercial partners is based on an objective and comprehensive assessment of the cost-effectiveness, technical and economic capabilities and overall reliability of the parties involved.

Pigna ensures that business relations and negotiations with suppliers and commercial partners are based on the utmost fairness and seriousness and are conducted in compliance with current regulations.

Under no circumstances may the decision-making bodies of Pigna give preference to one supplier over another on the basis of personal relationships, favouritism or advantages, nor may they adopt discriminatory attitudes in the procedures leading to the conclusion of contracts.

In the purchase of machinery, equipment and safety devices in general, the choice of suppliers must also focus on the ability to guarantee products that comply with mandatory environmental, safety and hygiene at work requirements, and comply with any certification and suitability obligations required by law.

In procedures for assigning to third parties services and/or activities to be carried out within the company, as part of tender, work or supply contracts, all Pigna departments involved undertake to check the technical and professional suitability of third parties, with particular reference to mandatory health and safety requirements, as well as compliance with compulsory labour law regulations.

In the selection of major suppliers, or in any case of supplies of a value exceeding EUR 15,000, it will be a good rule for Pigna to consider several offers in order to verify the economic suitability of the chosen supplier. Under no circumstances must compensation be paid in excess of normal market prices and/or for non-existent services, in whole or in part.

When assessing suppliers, especially if they are foreign or based in blacklisted countries, but also if they are Italian, considerations of honourableness and professionalism must be taken into account, and, as far as possible, their non-involvement in mafia or criminal organisations must be ascertained, and compliance with the laws and regulations in force must be demanded.

Any indicators of a lack of transparency on the part of the supplier (e.g. different country of registered office and bank account) must be promptly investigated and a record kept, and should there be any doubts as to the supplier's honourableness, no relationship must be entered into and, if necessary, interrupted.

Should Pigna suspect any link between the supplier and organised crime or mafia or terrorist associations when entering into the supply relationship and/or during the course of its performance, it must immediately terminate the supply relationship.

Consultants are chosen on the basis of their professionalism, seriousness and reliability. They are bound by confidentiality with regard to the information they acquire from Pigna in the course of their work and may use such information only for reasons inherent to their duties; in business relations with third parties, they are also required to behave ethically and in compliance with the law, with the utmost honesty, integrity and transparency.

Pigna undertakes to require its suppliers and consultants to comply with principles of conduct in line with its own. To this end, the Company's consultants are informed of the existence of the Company's Code of Ethics and individual contracts may include clauses requiring and regulating compliance with it.

The Company may not accept or receive gifts from suppliers that exceed normal practices of courtesy or that are not in line with normal business practice.

Relations with customers

Pigna promotes a collaborative and customer-satisfaction oriented approach, therefore relations are based on the principles of integrity, professionalism, confidentiality and efficiency.

The Company undertakes to manage its relations with customers in compliance with current legislation, with the service quality standards agreed with the counterparty, and with the provisions of the relative contract, encouraging a relationship based on trust, exchange of information, transparency and professional correctness.

Pigna also evaluates its customers on the basis of ethical requirements, considering this aspect to be of fundamental importance for the maintenance of the business relationship.

Prevention of potential money laundering

Pigna conducts its business in full compliance with current anti-money laundering, terrorist and mafia legislation and with the provisions issued by the competent Authorities, to this end undertaking to refuse to carry out suspicious transactions in terms of correctness and transparency.

The Company is therefore required to:

- verify, in advance and with professional diligence, the information available on commercial counterparties, in order to ascertain their respectability and the legitimacy of their activity before establishing business relations with them;
- operate in such a way as to avoid any involvement in operations that could, even potentially, favour the laundering of money deriving from illegal or criminal activities, acting in full compliance with anti-money laundering regulations.

Handling of money, goods or other benefits

Recipients are forbidden to engage in economic-financial transactions that involve the replacement or transfer of money, goods or other benefits deriving from a crime; or to carry out, in relation to these, other transactions that obstruct the identification of their criminal origin. It is also forbidden to use these assets in economic or financial activities.

In the event of ascertained or suspected counterfeiting of coins, banknotes and revenue stamps Pigna will immediately withdraw them from circulation and report the matter.

Financing of terrorist associations and associative agreements (Articles 3, 10 of Law No. 146/2006)

Pigna opposes any form of financing and/or relations with persons belonging to associations for the purposes of terrorism or the subversion of democracy.

The Company reminds the Recipients of this Code that, pursuant to Article 2 of the United Nations Convention against Transnational Organised Crime, ratified in Italy by Law No. 146/2006, it is forbidden for three or more persons to act in concert or in any case to associate, in Italy or abroad, in order to commit one or more offences, including mafia-type offences or offences aimed at smuggling foreign processed tobacco or illegal trafficking in narcotic or psychotropic substances or illegal immigration. Pigna demonstrates its intention to comply with the law and therefore strictly forbids the recipients of this code from engaging in such conduct.

External relations

The Company recognises the primary role of clear, effective, truthful and transparent communication in its external relations. In fact, they must be consistent, homogeneous and accurate and in conformity with Pigna's policies and programmes, as well as protecting, in compliance with the law, the image and reputation of the Company.

For this reason, external relations must only be conducted by authorised personnel and the information provided must be approved in advance by the Company.

Gifts, presents and gratuities

No form of offer, gift, gratuity or benefit may be made that may be interpreted as exceeding normal business practices or practices of courtesy, or in any case aimed at acquiring unlawful favourable treatment in the conduct of any activity connected with Pigna, or that may compromise the integrity or reputation of either party, that may influence their independent judgement or induce them to secure any undue advantage.

In this regard, any kind of gift to public officials, whether Italian or foreign, or to members of their families, aimed at influencing their independence of judgement is expressly forbidden.

Gifts may only be offered if they are of modest value and if their purchase is duly documented and authorised by Pigna's Managing Director.

On the basis of the same principle, the Recipients of this Code of Ethics who receive any gifts, gratuities or benefits that are not of modest value, or who receive solicitations for the provision of gifts, gratuities and benefits that are not of modest value, must promptly inform the Supervisory Board set up in accordance with Legislative Decree 231/2001, which will coordinate with the Administrative Body of the Company for the appropriate measures.

Modest value means an amount of no more than €50.

Environmental protection

Pigna pays constant attention to the protection of the environment, as a primary asset to be safeguarded. From the very first activities carried out, environmental care has been a priority issue for the Company, which has always distinguished itself for its attention to the sustainability of its activities.

To this end, the company has adopted an integrated Quality and Environment Management System, regularly certified for all divisions, in compliance with UNI EN ISO 9001:2008 and UNI EN ISO 14001:2004 standards. Compliance with these standards confirms the application of international organisational norms aimed at improving company performance and bears witness to the company's concrete desire to control and reduce the impact of Pigna's activities on the environment, favouring, all things being equal, the most eco-sustainable initiatives and solutions.

The certifications represent the increasing importance given to environmental issues, through the rational use of energy, the reduction of waste, the correct treatment of waste and the continuous work of raising the awareness of all personnel.

Pigna's attention to the environment is also demonstrated by a number of products made entirely of recycled paper, marked with the Pigna Nature brand, for which no further forest felling is required.

In addition to the desire to increase the use of recycled paper, Pigna pays particular attention to protecting the environment through:

- the reduction of noise emissions directed towards the outside of the production sites;
- the reduction of potential sources of soil contamination;
- the development of a feasibility plan for the reduction of emissions into the atmosphere.

Pigna also certifies its products with two marks, FSC and PEFC:

- The FSC mark identifies products containing wood from forests that are managed correctly and responsibly according to the strict environmental, social and economic standards established and approved by the Forest Stewardship Council;

- The PEFC logo, on the other hand, is granted to companies that produce goods using products from sustainably managed forests and other non-controversial sources.

The Recipients of this Code must base the conduct of their activities within Pigna on the utmost protection of the environment, committing themselves to comply with the relevant regulations in force. In particular, illegal discharges, emissions, immissions and spillages are expressly forbidden. The management of company waste must take place in accordance with the regulations in force.

Health, Hygiene and Safety at Work

Pigna considers the environment and nature to be fundamental values and the heritage of all, to be protected and defended. To this end, the Company, in the context of its activities, is committed to contributing to the development and wellbeing of the communities in which it operates, pursuing the objective of guaranteeing the health and safety of its employees, external collaborators, customers and the communities affected by its activities and reducing its environmental impact.

Pigna takes the necessary measures to protect the health and physical and moral integrity of its collaborators, adopting models of company organisation based on the constant improvement of safety in the workplace, guaranteeing working conditions that respect individual dignity and a safe and healthy working environment, in full compliance with the relevant legislation in force.

Pigna assesses all risks to the safety and health of those who - in various capacities - work within the company (whether they are direct employees, employees of other companies working for the company, visitors, etc.); this assessment also includes the choice of work equipment and the layout of workplaces. Therefore, research and technological innovation is dedicated in particular to the promotion of products and processes characterised by a high level of attention to the safety and health of operators.

To this end, Pigna has integrated its Quality and Environmental Management System into the area of safety, transforming the system into an Occupational Health and Safety Management System (*Sistema di Gestione Salute e Sicurezza sul Lavoro - SGSSL*), an implementation that has allowed Pigna to obtain recognition of OHSAS 18001:2007 conformity. The OHSAS standard is internationally recognised for predicting and managing occupational safety risks and allows companies to better assess risks and improve their performance. OHSAS 18001 aims to make the control, knowledge and awareness of all possible risks inherent in situations of ordinary and extraordinary operations systematic for the company. The certification focuses on the daily management of health and safety, requiring the company to continuously improve.

Accordingly, every company decision regarding occupational health and safety must be based on the following principles:

- prevention, assessment and elimination of risks wherever possible;
- adoption of initiatives aimed at mitigating the incidence of any monotonous and repetitive work, in order to reduce its potential harmful effects on health;
- updating assessments as technology evolves;
- replacing what is dangerous with what is not or is less dangerous;
- appropriate planning of prevention activities;
- emergency measures to be implemented in case of first aid, fire fighting, evacuation of workers and serious and immediate danger;
- use of warning and safety signs;
- regular maintenance of environments, equipment, machines and plants;

- information, training, consultation and participation of workers or their representatives on matters relating to safety and health at work;
- adequate instructions to workers.

The Recipients of this Code, and in particular the Employer and their delegates and sub-delegates, if any, the Supervisors, the Workers, the Prevention and Protection Service Manager, the appointed Doctor and the Workers' Safety Representative, contribute to the process of risk prevention and health and safety protection for themselves, their colleagues and third parties, without prejudice to individual obligations and responsibilities pursuant to the applicable provisions of law.

The use of alcohol or drugs is strictly forbidden within the company's activities. Smoking in the workplace is also prohibited.

In order to implement its own safety policy in the workplace, the Company provides continuous training and raises awareness of safety issues among all personnel.

Accounting and financial reporting

Pigna is aware of the importance of transparency, accuracy and completeness of accounting information and strives to have an administrative-accounting system that is reliable in correctly representing management events and in providing the tools to identify, prevent and manage, as far as possible, risks of a financial and operational nature, as well as risks of fraud to the detriment of the Company.

Administrative and accounting operations are carried out with the aid of specific IT applications, which allow for the offices in charge to be more efficient and in line with the accounting principles, while at the same time favouring any necessary control of congruity and legitimacy. For each accounting operation carried out, adequate supporting documentation is kept on file in order to allow for identification of the various levels of responsibility and an accurate reconstruction of the operation, so as to reduce the possibility of errors of interpretation.

In the financial statements and in the other accounting and tax documents required by the regulations in force, the Company provides a correct and faithful representation of the company's situation, so as to ensure transparency and promptness of verification for its stakeholders.

In the ultimate interest of shareholders, it is essential to maintain financial communication that is accurate, timely and as transparent as possible.

The Company therefore condemns any conduct aimed at altering the correctness and truthfulness of the data and information contained in the financial statements, reports or other corporate communications required by laws and regulations or in any case made available to stakeholders.

Within the scope of their relationship with the Company, the Recipients of this Code are forbidden to:

- expose material facts that are not true;
- omit information, the disclosure of which is required by law, on the economic, equity or financial situation of the Company;
- conceal data or information in such a way as to mislead the Recipients thereof;
- prevent or in any case hinder the performance of the control activities legally attributed to shareholders, other corporate bodies, supervisory and control bodies or the competent Supervisory Authorities.

In defining variable remuneration for Managers, and in particular for the Chief Financial Officer, Pigna pays particular attention not to encourage conduct that distorts financial reporting.

Implementation, control and disciplinary system

The Supervisory Board

In order to ensure compliance with the rules and principles set out in the Code and in order to make its commitment to ethics applied to company conduct tangible, as well as to verify the operation and effectiveness of the Organisational, Management and Control Model pursuant to Legislative Decree 231/2001 adopted for the prevention of the offences covered by the above rules, Pigna has set up a Supervisory Board (hereinafter also referred to as the "SB" or "Board").

The Supervisory Board, appointed by the Company's Board of Directors, therefore also supervises the application of the Code of Ethics and its effectiveness, ensuring:

- supervision of the dissemination of the Code of Ethics by company representatives among the Company's collaborators, customers, suppliers, commercial partners and in general among all third parties who enter into relations with the Company;
- support in the interpretation and implementation of the Code of Ethics, as well as its updating;
- the assessment of any cases of violation of the rules, providing, in the event of an infringement, for the adoption of appropriate measures, in collaboration with the competent company departments, in compliance with the laws, regulations and collective labour contracts;
- that no one may be subjected to pressure or interference for having reported conduct that does not comply with the Code of Ethics.

Duty to report violations of the Code of Ethics

Each Recipient shall report to his or her direct superior and/or to the Supervisory Board any information concerning violations of the Code of Ethics. If, for a justified reason or for the sake of expediency, it is deemed inadvisable to refer directly to one's immediate superior, the report must be made directly to the Supervisory Board.

Anyone may report alleged violations of the Code of Ethics to the Supervisory Board, even anonymously to the dedicated e-mail address (odv231@pigna.it), provided that the information provided is as detailed as possible, in order to allow the Board to carry out the necessary checks.

The Supervisory Board will collect the report, check its grounds and assess whether it is appropriate to proceed with further investigations. The Supervisory Board undertakes to maintain the anonymity of the reporter as far as possible, except in the case of the involvement of public authorities. In any case, all requests will be answered promptly, without any risk for the reporter of suffering any form, even indirect, of retaliation.

Omission or failure to report such circumstances constitutes a violation of this Code of Ethics.

Disciplinary system

Non-compliance with and/or violation of the rules of conduct set out in the Code of Ethics by Pigna employees constitutes non-compliance with the obligations arising from the employment relationship and gives rise to the application of the disciplinary sanctions provided for by law, by collective bargaining agreements and by the disciplinary system which the company has adopted as part of its Organisational, Management and Control Model pursuant to Legislative Decree 231/2001. The

management of disciplinary proceedings and the imposition of sanctions shall be the responsibility of the relevant Company departments.

In the event of violations of the Code of Ethics on the part of the Company's statutory bodies, the Supervisory Board must inform the Board of Directors and the Board of Statutory Auditors, so that these bodies can take the appropriate initiatives in accordance with the law and in compliance with the disciplinary system which the Company has adopted as part of the Organisational, Management and Control Model pursuant to Legislative Decree 231/2001.

Any behaviour on the part of collaborators, suppliers, consultants and commercial partners linked to Pigna by a contractual relationship other than an employment relationship, in violation of the provisions of this Code, may result, in the most serious cases, in the termination of the contractual relationship in accordance with the disciplinary system adopted by the company as part of its Organisational, Management and Control Model pursuant to Legislative Decree 231/2001.

This is without prejudice, in any case, to the right to take legal action to obtain compensation for any damages suffered by the Company, should the conditions exist.

Final provisions

The Code of Ethics is approved by Pigna's Board of Directors. Any future updates, due to regulatory adjustments or the evolution of the company organisation, will be approved by the Board of Directors and promptly circulated to all Recipients.

The Code does not replace current and future company procedures which continue to be effective to the extent that they do not conflict with the Code itself.

Pigna informs all Recipients of the provisions and application of the Code, and advises them to comply with it.

The Code will be brought to the attention of third parties who receive assignments from Pigna or who have a lasting relationship with the company.

Signature for acknowledgment and acceptance:

Name Surname

Date .../.../.....

Stamp and signature