



# CODE OF ETHICS **OF THE GROUP**

**BORMIOLI LUIGI**  
GLASSMAKER



**BORMIOLI LUIGI**  
GLASSMAKER

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**BORMIOLI LUIGI**  
GLASSMAKER



## OUR STORY

The Bormioli Luigi Group (hereinafter also "*the Company*" or "*the Group*") is a world leader in the **manufacturing of glass containers** for perfumes, cosmetics, spirits and articles for the tableware sector.

The Group also carries out secondary processing on glass through its subsidiary After Glass S.p.A. and its French subsidiary Bormioli Luigi France SA.

The Bormioli family's tradition in the art of glassmaking dates back to 14th century France, a bond that has not been broken for over 25 generations. **Quality and excellence** are part of the history of this company and still the pillars on which it rests today. The founders' focus on the quality of their operations and the **elegance of their business style** has become rooted in the Group's widespread corporate culture over the years. Today, it guarantees maximum reliability in partnerships with the most prestigious customers, laser-focused on excellence.

In 1946, Luigi Bormioli, an engineer to trade, founded Bormioli Luigi S.p.A., a manufacturing company specialising in the production of **glass containers for the perfumery** and cosmetics sectors, and prioritising the quality of its products and processes. Thanks to this attitude and to the foresight of the current Chairman, Mr. Alberto Bormioli, right from the moment in which the company was founded, it was bent on penetrating international markets, and today it is one of the main players in the perfumery and tableware bottle sector with the **two brands, Luigi Bormioli and Bormioli Rocco**. In 2012, with the founding of **After Glass**, the Group expanded into secondary glass processing, a market it had already entered thanks to its French subsidiary, Bormioli Luigi France.

Throughout its history, the company **has grown exponentially**, thanks to the excellence of its people, its continuous focus, innovation and research, its determination and courageous choices.

# THE ART OF GLASSMAKING HANDED DOWN FOR GENERATIONS

**1300-1800**

In the North of France, the Borniolle family had been dedicated to the art of glass-making for some five generations. When, in the 16th century, the family emigrated to Italy and settled near Genoa, it changed its surname to Bormioli.

**1946**

Luigi Bormioli founded a new glassworks bearing his name. Right from the first day, its focus has been on product quality and process efficiency.

**1986**

Branches were set up in France and the USA, and exports to the French perfumery market commenced.

**2006-2020**

With Alberto Bormioli at the helm, the company invested in innovation, research and development, increasing production efficiency and filing important patents.

**2012**

Founding of the company After Glass, specialising in secondary glass processing.

**2017**

Acquisition of the household glassware business branch from Bormioli Rocco.

**2021**

Production capacity expanded with the installation of the first line dedicated to perfumery at the Azuqueca plant of the subsidiary Bormioli Rocco Spain.

## OUR COMMITMENT

At the basis of the business approach of the Bormioli Luigi Group is the conviction that ethics in the running of a company is one of the main factors guaranteeing the success and protection of the company itself.

The pillars that support the company culture, which is spread and shared with every collaborator, are geared towards achieving the success of the organisation, without ever losing sight of the company values and the behavioural rules that characterize a responsible work method.

This Code of Ethics (hereinafter also the "Code") **stipulates the principles and values on which the Group bases its activities, operations, behaviour and relations**, with both internal and external parties.

With this Code, the Group wishes to declare its commitment and values towards:

- **end-consumers and B2B** customers by focusing on the continuous evolution of their needs;
- **employees** by protecting their rights to health and safety, fair pay, professional growth, family support and commitment to the local community;
- **products** embodying the **quality and excellence** achieved through continuous investment in **research and development** for the purpose of guaranteeing constant innovation;
- **the environment**, acknowledging environmental protection as a primary asset by obtaining **certifications, improving production sites, implementing patents** to safeguard the environment and drafting a **sustainability report**;
- **information security** through a **corporate digitalisation** process aimed at implementing modern and resilient information systems while paying continuous attention to the confidentiality, integrity and availability of information and **sensitive data**.

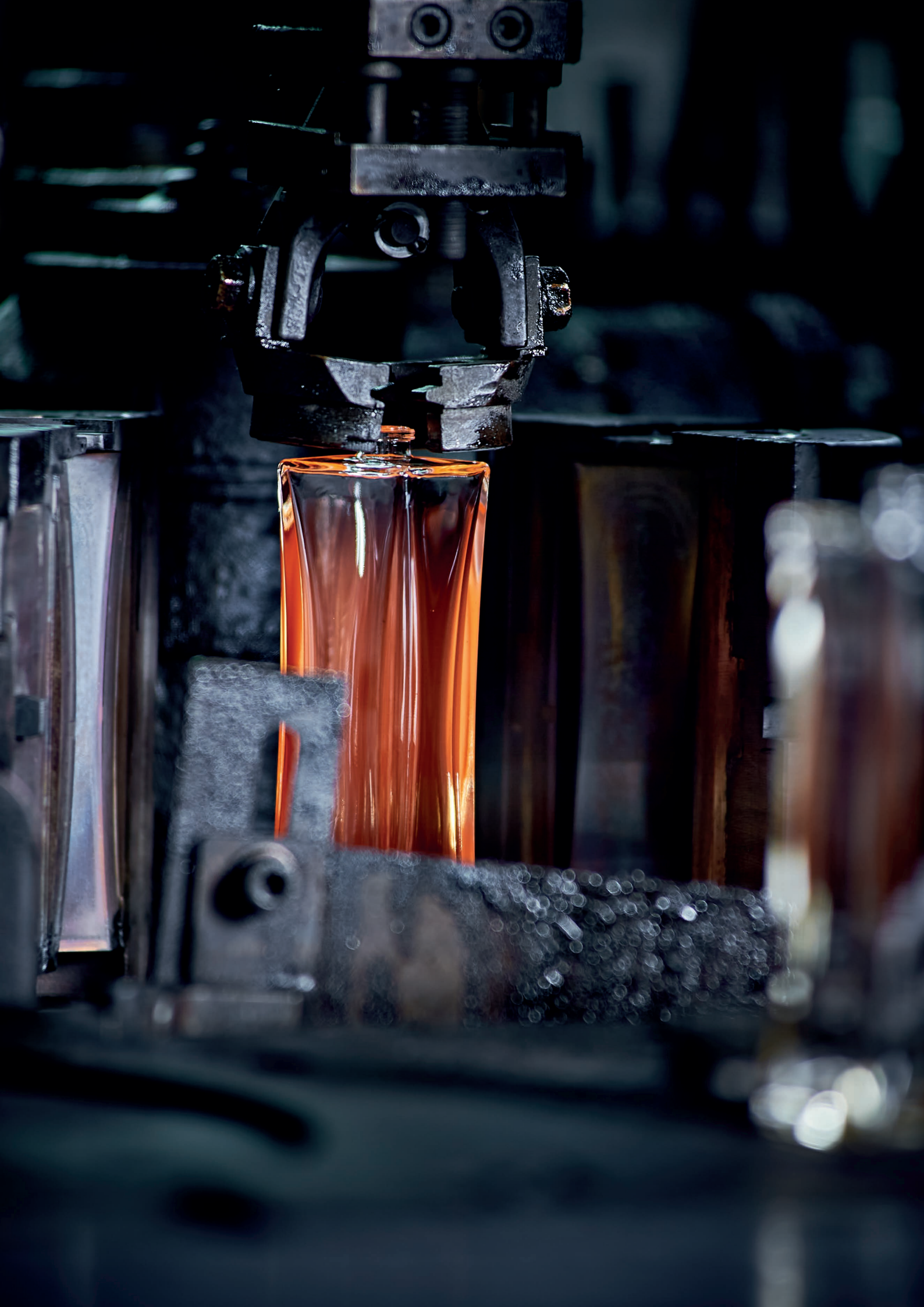




## OUR MISSION

The Group's mission is **three-fold**:

- to create, **in the field of perfume bottles**, all the conditions for manufacturing the **best possible product** so that the best **fragrance companies** in the world will choose us as their **partner**, convinced of the decisive contribution we can make to the growth of their success;
- to affirm, in the **tableware sector**, a **product with unique characteristics** on the market so that our range represents a constant and easily **recognizable reference** for all those people who identify their style with the expression of our culture's values;
- **to design and develop innovative decoration technologies** for the production of **decorated items** suited to the most demanding requests of the reference markets.





## OUR VALUES

The ways in which the principles contained in this Code are applied, are defined in the Labour and *Human Rights Policy*, which emphasises the *promotion of work*, **professionalism and respect for human rights as an essential value** on which corporate culture and strategy are based, as well as in the Environmental Policy.

So it has two ambitions: **to distinguish itself on the market** by providing products of excellence to its clientele and to be recognised as a **responsible reference** by all of its stakeholders, through behaviour that demonstrates attention to society and the surrounding environment, always seeking sustainable development.

## OUR VALUES



### ENTREPRENEURS OF OURSELVES

The complex life of a glass manufacturing plant is made up of moments in which the expression of outstanding human skills is of the utmost importance. Only the ingenuity of an enterprising human being can develop innovation, only the equilibrium of a rational human being can combine opposing ideas, only the spontaneous generosity of an intelligent human being can dedicate him/herself to the good of the company. This awareness instils the activity of all those working in the company with the responsible and enthusiastic spirit of people who are also enjoying a personal success.

### OPEN

We are eager to explore new frontiers and opportunities, we are open to all the initiatives that could bring about improvements in know-how, conduct, technology, growth and greater value for us and for our customers.



### INNOVATIVE

Innovation for the Group is a mental attitude that is experienced every day: we want to learn, change, and rise above our limits. This is, in fact, an indispensable condition to guarantee a long life to the company: to remain forever young and be reborn each day.

### FREE

Well-balanced, independent financial management is an indispensable prerequisite to ensure freedom of action and decision-making. Only in this way does the desire to achieve the goals for which we strive, and which we consider worthy of being achieved, acquires meaning.



### SUSTAINABLE

The Group continues to invest unwaveringly in the ecological transition. As a player, our aspiration is to be a role model and a partner to our customers, in upholding the historical virtues of glass and the development of the sector, with fundamental respect for people and their environment.

## OBJECTIVES AND RECIPIENTS

The **Code of Ethics** is the shared document in which the Company clearly and unequivocally **lays down** the **values and principles** that inform its activities in compliance with national and international regulations. It is a tool that enables both internal and external human resources **to become better acquainted with the Group, its style, commitment, position and responsibilities.**

Its aim is to remind all employees, irrespective of their contract type, location, role or seniority level, to embrace the Bormioli Luigi Group's way of doing business.

The Code **applies to the parent company Bormioli Luigi**, to the **Directors**, to all individuals tied to the Company by employment relationships ("**Employees**") and to all those who work for the Company, irrespective of the relationship binding them to it ("**Collaborators**"). In addition, **the Group's (direct or indirect) subsidiaries**, which implement and apply the principles laid down in this document are also to be considered Recipients of the Code of Ethics.

Employees and Collaborators, including suppliers, consultants and customers, without distinction or exception, undertake to observe and ensure observance of the principles of the Code and the rules of the laws and regulations in force, within the scope of their functions and responsibilities as well as when performing their professional activities also outside the Company. Under no circumstances may the conviction of acting to the advantage of the Company justify the adoption of conduct contrary to these principles.

**The Bormioli Luigi Group undertakes to disseminate the Code of Ethics among its Employees and Collaborators and to ensure that they understand the principles and rules contained therein.**



## DISSEMINATION

The Bormioli Luigi Group undertakes to disseminate this Code of Ethics to all **Shareholders, Employees and Collaborators** so that they can follow its principles when performing the activities and/or assignments entrusted to them.

To this end, it prepares an **information, training and awareness-raising programme** concerning the provisions of the Code of Ethics and their application to the relevant parties.

Furthermore, the Code is placed at the **disposal of third parties** such as suppliers and business partners who receive assignments from the Company or have lasting relations with it, requesting that they share its principles and standards of behaviour. It is also available to the **wider public**, if interested.

**Failure to observe** the principles of conduct listed in the Code of Ethics **will be punished** on the grounds of **misconduct and/or breach of contract** with the consequent application of the relevant **sanctions**.

In relations with third parties, failure to accept the values laid down in the Code could lead to the contractual agreement not being finalised; similarly, subsequent non-observance of the same could lead to termination of the relationship.



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01 section

ATTENTION TO  
**HUMAN RESOURCES**





## Attention to human resources

**Honesty, loyalty, ability, professionalism, seriousness, technical preparation and dedication of personnel.**

These are the characteristics required by the Luigi Bormioli Group from its Directors, Employees and Collaborators.

The Company is also committed to ensuring that employees' personal **information** and their **privacy** are appropriately **protected**, in accordance with the terms of the law, even in those countries that do not have the same required security standard, avoiding unauthorised improper use, in order to safeguard the dignity, image and confidentiality of each person, whether they be internal or external to the Company.

### **PROMOTION OF PEOPLE**

The Bormioli Luigi Group acknowledges the **centrality of human resources**, convinced that the main success factor in any business is the **professional contribution of the people working in it, within a framework of loyalty and mutual trust**. As a result, **the Bormioli Luigi Group considers the psycho-physical well-being and peace of mind** of its personnel as strategic factors for the company, with the power to contribute to the improvement of the productivity, effectiveness and efficiency of its internal production processes.

For this reason, the Company has adopted **procedures** to cover all the main aspects connected with the **management of Employees**, fight against discrimination and harassment and **respect for fundamental human rights** in the workplace. In particular, in addition to compliance with the applicable principles of labour law, the Bormioli Luigi Group promotes the development of the professionalism of each resource through:

- respect for the **personality** and the **dignity** of each individual, also during the recruitment phase;
- **prohibition** and **prevention** of **discrimination and**

**abuse** of any kind based on, but not limited to, nationality, political opinions, trade union membership, religious beliefs, racial and ethnic origins, gender, sexual orientation, age and state of health of its interlocutors;

- **training** appropriate to the position of each individual;
- the **definition of roles, responsibilities, assignments and availability of information** such as to ensure transparent and effective allocation of competences, and to guarantee that each employee is able to take the decisions within the scope of their competence, in the interests of the Company;
- **prudent, balanced and objective exercising of the powers** connected with the assignment received;
- praise and **encouragement of the spirit of innovation**, while respecting the limits of each individual's responsibilities;
- **clear, precise and truthful internal communication**;
- **fair and confidential use of personal data**;
- hiring with a **regular employment contract** (no irregular work is allowed).

The Bormioli Luigi Group ensures that the **recruitment and hiring** of personnel is carried out on the basis of **criteria of objectivity, transparency, competence and professionalism**, respecting equal opportunities and without any discrimination whatsoever; no forms of illegal employment are tolerated.

The Company, which is opposed to the exploitation of child labour, collaborates with high schools to promote school-work training experiences, in accordance with the legislation in force and in the forms allowed.

**The traceability and documentability of personnel recruitment** process is also guaranteed. Notwithstanding the foregoing, it is **forbidden to employ non-EU nationals with irregular or expired residence permits**.

Human resources management is carried out with respect for the individual. For this reason, initiatives such as assignments, promotions or transfers only come about on the basis of the individual's professional profile and competence. Senior Executives and function managers are expected to promote and increase the professionalism of their Collaborators.

**In relations with colleagues**, each resource must also behave according to principles of **fairness and civilised coexistence, in a spirit of full cooperation**.

With regard to working hours and shifts, work requirements are decided while taking into consideration individual leisure time and the quality of life of the resources. The employee is obliged to respect the contractually agreed working hours and shifts and to report any absences or leave in a timely manner.

## CONFLICT OF INTEREST

The Group's Directors, Employees and Collaborators **must avoid any situations in which personal interests could come into conflict with those of the Company**. In addition to being against the law and the principles laid down in the Code, the arising of conflicts of interest is detrimental to the image and integrity of the company. A conflict of interest arises when personal interests or activities affect, or could potentially affect, an individual's ability to act in the best interests of the Company. **Recipients must avoid - and, in any case, are bound to report - any situations or activities that could lead to conflicts of interest**, or that could interfere with their ability to make impartial decisions, designed to safeguard the interests of the Bormioli Luigi Group.

More generally, in **relations with third parties**, recipients must act in a **fair and transparent** manner, and are explicitly **forbidden from resorting to illegitimate favouritism, collusive practices or the solicitation of personal advantages for themselves or others**. Each activity approved, notwithstanding the actual or apparent existence of a conflict, must be documented.

Situations that could lead to a conflict of interest include:

- setting up work relationships with family members;
- having financial interests in another company in the same sector or in business partners (e.g. suppliers or customers);
- having a second job;
- running one's own business;
- managing another company.





## SUPPORT FOR LOCAL COMMUNITIES

The Bormioli Luigi Group considers the promotion of local communities and of the area in which it operates to be of fundamental importance. This is why it promotes projects and initiatives in cooperation with local associations.

The blood donors' association, FIDAS, was founded in 1970 in Parma under the name ADAS (Associazione Donatori Aziendali Sangue). Bormioli Rocco and Bormioli Luigi are among the founding members. The **employees** of the two companies can **voluntarily join the FIDAS association** and **donate blood**.

On 1 May each year, FIDAS organises a company party during which **deserving donors** are rewarded. In April, a visit to the Fidenza plant is organised for donors and their families together with **lunch and a prize-giving ceremony**. Each Christmas, a food hamper is distributed to active donors. The association is also involved in **charity activities**. The latest activities concern donations for multiple sclerosis to AISM Parma and donations to Fidenza's autistic children association (Bambini

Autistici Fidenza). The main purpose of the group is **to promote voluntary and unpaid blood donations**. Various initiatives are promoted to raise awareness of this important gesture: for example, a **lucky dip** is organised every year, the proceeds of which go entirely towards the purchasing of material to be donated to a charity association.

Based on the idea of an employee, **bottles for collecting bottle caps** were distributed in the Fidenza plant, both in the building and outside. Once filled, these are collected and handed over to the "Amicizia senza frontiere" (Friendship without Borders) association in Valera (Parma). **The proceeds of the sale** are used for the **construction of wells for drinking water** in Burkina Faso.

**The CRAL is a non-profit recreational and cultural association** that takes the form of a social promotion association. Among the various activities that it promotes are:

- the **organisation of trips** with discounted prices for members;





- **Women's Day:** every female member is given a gift on 8 March (purchased from companies in need of support);
- **the children's festival:** dedicated shows, snacks and CRAL gadgets;
- **theatre shows** whose proceeds are donated to various voluntary associations (e.g. Arim voluntary association, Bimbi Autismo Fidenza, etc.)

Among the various activities that it promotes are:

- the **holding of various activities:** for example, provincial championships are organised for fishing, cycling and running, and an internal tournament is organised for five-a-side football and bowling;
- **offering of a contribution to employees** (reimbursement of part of the fee) who carry out activities (swimming and gym) at centres with corporate rates;
- **corporate rates** with retail stores;
- **discount** for members on purchases of **Luigi Bormioli products** at the in-house shop.

Additionally, the CRAL is affiliated with the Italian Sports

Promotion Organisations in the sector (CSI - UISP) in which the employees participate.

An all-inclusive annual contribution (for the running of the association) is paid for the activities of the CRAL.

Moreover, there are **two "sports" groups** in the CRAL: the fishing group and the cycling group, which, for an annual fee, organise internal competitions and championships. Donations are also made to local voluntary organisations (e.g. kennels, catteries, voluntary ambulance service, CRI (Italian Red Cross), "La fattoria di Rebecca" educational farm, etc.).

The company also **funds the "MEDAGLIE D'ORO" (gold medal) group**, i.e. a group of **employees who have worked for Bormioli for at least 25 years**. Former employees can also join the group. Once a year, an outing is organised and the "MEDAGLIE D'ORO" award is presented to an employee who has reached the milestone of 30 years of service.

## HEALTH AND SAFETY

The health and safety of its people is one of the Group's priorities.

**Protecting people and safeguarding their fundamental rights** is an **essential prerequisite** for all company activities, from the departments to the offices.

The Bormioli Luigi Group has adopted the **Occupational Health and Safety Policy**, considering it a valid support tool for the optimisation of the processes designed to guarantee the protection of people in a safe and healthy working environment and proper training on safety in the workplace.

The objectives of this Policy can be summarised as follows:

- to guarantee the maintenance of the **best possible health and safety conditions** for all personnel working at or on behalf of the Companies, through the identification and prior assessment of all risks arising from the activities actually carried out;
- **to protect the health and safety** of the workers in the performance of their professional activities;
- **to reduce accidents to a minimum** by putting appropriate prevention measures in place;
- to provide **healthy and safe workplaces** through constant inspections and regular maintenance of the

facilities and equipment;

- to take all the measures necessary **to protect the well-being and physical integrity of workers** by creating a healthy working environment;
- to guarantee the presence of **figures with precise roles and responsibilities in the field of health and safety**, so that they can become a reference point for all the personnel of the Group;
- to develop a **constructive dialogue with employees**, also with the involvement of the Workers' Safety Representatives (**RLS**).

In order to achieve the above objectives, and in addition to having adopted an **Organisational Model for the management of safety** for all its sites, in compliance with Article 30 of Legislative Decree 81/2008, the Bormioli Group implements concrete initiatives, among which:

### **Compliance with the highest international standards**

The Group implements Environment and Safety Management Systems in line with the highest international standards, through periodical inspections by an accredited third party that verifies compliance with SMETA and WTA standards and through the filling in of assessment questionnaires on the recognised platforms Ecovadis, Higg and SEDEX.



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### Setting up of a HSE Committee

To be able to respond promptly and effectively to issues related to health and safety in the workplace, a **HSE Committee** was set up, which meets monthly to analyse the dynamics of any accidents or near misses that may have taken place, to assess the results of any audits (e.g. SMETA audits) and to define subsequent actions for improvement and new projects.

### Constant training for all personnel

The Group gives priority to training as an important awareness-raising tool for all personnel: **all workers - employees and contract workers alike - are trained on health and safety issues** on the basis of the duties assigned to them, with the aim of reducing residual risks and improving general working conditions, guaranteeing the correct execution of the operational activities and of the prevention and protection measures in place.

### Attention to suppliers

When selecting its suppliers, the Company also carefully evaluates the occupational health and safety aspect by including specific questions on the subject in its evaluation checklist, in order to assess **its suppliers with respect to health and safety issues**. Additionally, for specific categories of suppliers, collaborators and contractors, the drafting of the DUVRI (Single Document

for the Assessment of Interferential Risks) is required.

### Main security measures implemented in the Group plants

#### • The “uomo a terra” (man down) project

With a view to continuously safeguarding and improving the health and safety of workers, the “uomo a terra” (man down) project was implemented: this involves a device that can be **worn by workers**, when they are working alone in an isolated location, for their safety in the event of illness.

#### • The adoption of an “anti-collision” system

This is a **system to be installed on forklifts**, which, when a pedestrian approaches, automatically triggers a warning light and sound signal for the driver, so as to avoid potential man-vehicle collisions. Furthermore, the “ergonomics” project has also been launched: this consists of carrying out a risk assessment by means of sensorised suits.

#### • Improvement of safety devices on production lines

Improvement plans have been undertaken for the safety devices already installed on production lines. Starting from a risk assessment, carried out with the back-up of specialised consultants, **they single out the technical interventions to be conducted on the machines** in order to reduce risks during their use, setting and maintenance.



## CORPORATE ASSETS

The term “**corporate assets**” does not only refer to **tangible items** such as equipment, materials, furniture and structures, but also **intangible items** such as data, software, reputation and financial instruments.

The Company’s assets are the property of the Group and must only be used to pursue the Group’s objectives; **any form of misuse is therefore prohibited.**

Staff and employees are called upon to use the corporate assets in a **responsible and sustainable** manner and in compliance with the Group’s procedures in order to guarantee their **safe and efficient use** and avoid damage and waste. This also means ensuring that assets are safe from external threats such as theft, computer crimes or natural events.

Each person is responsible for the protection of the assets entrusted to them and has the duty to **promptly**

**inform the persons** in charge of any threats or events harmful to the Company.

In order not to damage the functionality of the **computer apps** and to protect them, each person is required to:

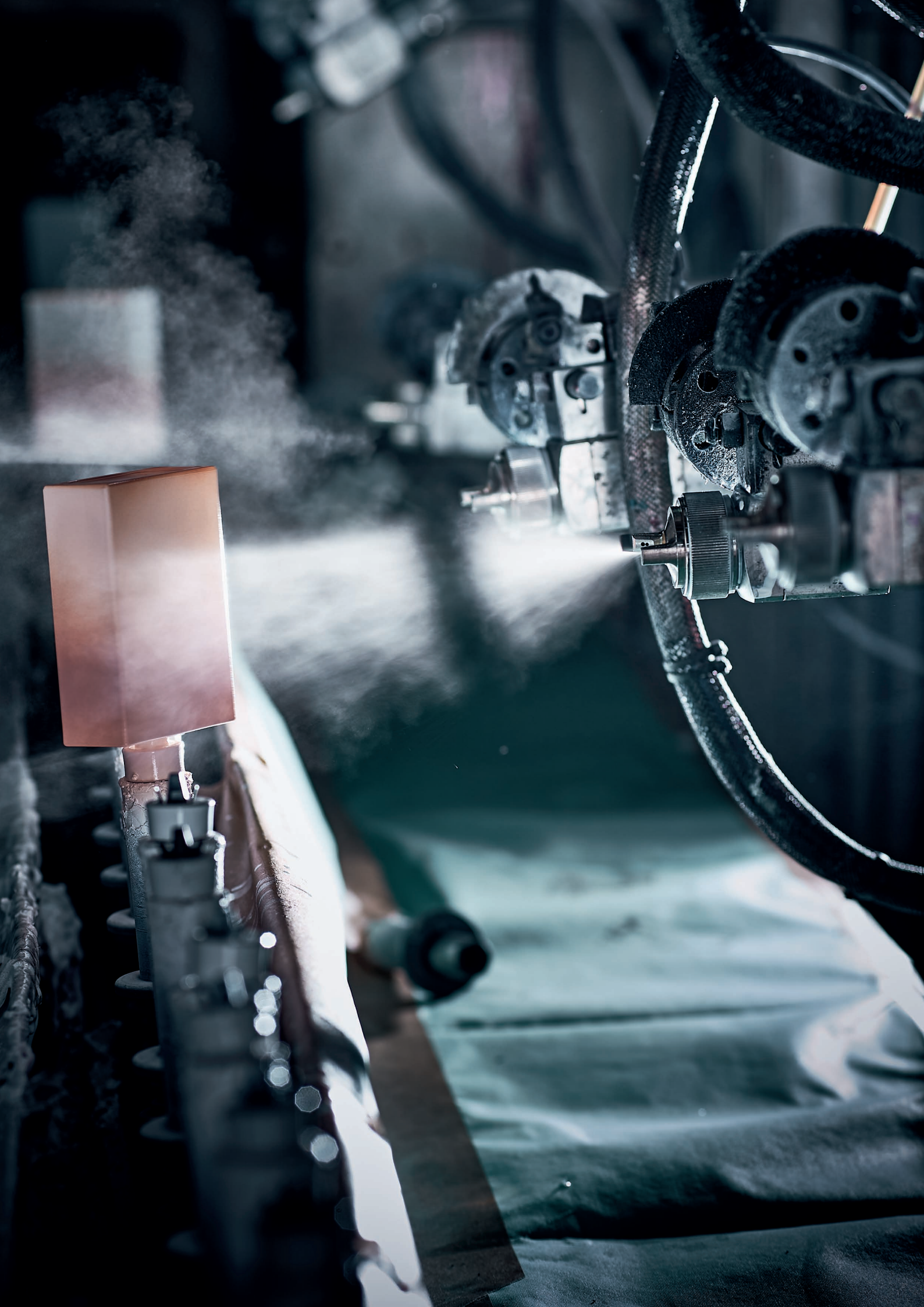
- scrupulously adopt the provisions of the **company’s security policies**;
- ensure that any e-mail **messages** they send are **appropriate and relevant** to the work environment and written in the **correct linguistic register**;
- **browse on appropriate Internet sites** that do not contain indecent and offensive content.

**Company data** are processed exclusively for the purposes agreed upon and, in any case, with the **full consent of the party concerned**. Any confidential information is managed and communicated, pursuant to the law and corporate regulations, by the relevant functions.

02 section

ATTENTION TO  
**THE ENVIRONMENT**





## Attention to the environment

The Bormioli Luigi Group has adopted a **responsible approach** in order to be able to offer high-quality product experiences that contribute positively to the society of today and tomorrow.

This conviction continues to guide the Company towards **a more sustainable value chain**, through **responsible procurement and efficient production**.

Its **environmental sustainability strategy is constantly evolving**: the Company keeps abreast of the main environmental issues it is facing (e.g. substitution of packaging, careful use of resources, reduction of consumption, search for alternative materials, etc.); it promotes internal awareness and drafts reports on performance and on any environmental issues related to products, activities and the value chain.

The Bormioli Luigi Group **invests** in technology and the **research and development of innovative and sustainable solutions** with a lower environmental impact. The company's investments and activities are aligned with the principles of sustainable development. The Parma and Abbiategrasso production plants are certified according to **UNI EN ISO 14001**. The Company is also committed





to heightening the **awareness of its employees and collaborators on the subject of environmental issues** and progressively **decreasing its environmental impacts**.

The Company has achieved its sustainability goals thanks to its investments in research and development and the efficiency improvements made to its production sites and locations, as well as the strategies and tools used to achieve these goals, such as:

- the definition and formalisation of an energy policy and strategy;
- the definition and formalisation of an environment policy and strategy;

- the refurbishing of the furnaces and the boosting of production efficiency through the use of hybrid technology (methane heating and the use of electric heating elements), which has led to a reduction in direct CO2 emissions;

- the use of sustainable packaging.

Additionally, the Bormioli Luigi Group has equipped itself with a **non-financial reporting system** and drafts an annual **Sustainability Report**, a non-financial reporting tool indispensable for defining short-, medium- and long-term sustainability goals and for reporting on what has already been achieved as regards sustainable development.

section  
03

RELATIONS WITH  
**THIRD PARTIES**







## Relations with third parties

Relations with third parties must be conducted **in compliance with the law, applicable regulations and internal procedures**. They must also be based on observance of the rules of fairness and loyalty, avoiding conflicts of interest and following the principles of this Code.

### SUPPLIERS

Relations with suppliers and their full adherence to the values of the Bormioli Luigi Group is a prerequisite for the success of the Company. For this reason, it is essential to establish a genuine partnership with each supplier and external collaborator, **based on trust with full sharing of commitments, principles and objectives**.

The Bormioli Luigi Group selects its suppliers exclusively on the basis of **parameters** such as **quality, expediency, professionalism, capacity, reliability, efficiency and reputation, shunning any discrimination**, and it builds a business partnership with them based on values such as dialogue, **transparency and respect, seeking** to establish relationships of mutual fairness.

For the Bormioli Luigi Group, the choice of suppliers is an element of fundamental importance if innovation and excellence in the production and marketing of its products is to be guaranteed. To this end, the Company supports business mechanisms, such as **long-term contracts**, which help to ensure a more stable income for small and medium-sized local companies while **facilitating a transparent pricing policy** that provides a reference on raw material prices.

The company verifies **professional reliability** by **requesting appropriate documentation** and, in the case of the construction sector, Antimafia certification is also requested.

To this end, it is forbidden to have any kind of relationship (contractual, financial, etc.) with persons or organisations appearing on the main international blacklists.

In cases in which third parties are entrusted with activities to be carried out in the Company or within areas available to it, within the framework of a tender, work or supply contract, the **technical-professional suitability of the third party is verified, together with the regularity of its social contributions**, following up on the specific legal obligations concerning occupational **health and safety and labour intermediation** (e.g. compliance with the minimum wages and conditions provided for by the applicable CCNL (National Collective Labour Contract), working hours, shifts and rest periods, etc.).

The **conditions** under which the supply is actually provided must be those **contractually agreed upon**, as well as being based on the principle of **fairness of all remuneration** - on the basis of objective and impartial assessments - and the effective traceability of the tender documentation. The remuneration to be paid shall be commensurate with the service specified in the contract. With reference to consultancy services and professional assignments, it is forbidden to receive services or make payments to collaborators, consultants, partners or other third parties working on behalf of the Company that are not adequately justified in the context of the contractual relationship established with the said parties and the type of assignment to be carried out.

## CUSTOMERS

The Bormioli Luigi Group seeks to pursue **customer satisfaction**, in terms of product **quality and excellence of service**, thanks to the high level of professionalism of all its employees.

Customers and end-consumers must be transparently guaranteed **comprehensive and precise information** on products and services, also with regard to quality profile and origin, to enable them to make informed choices.

## PUBLIC INSTITUTIONS

Contacts with Public Institutions are reserved for those functions of the Bormioli Luigi Group that have received an **express mandate from the Company's management**.

**Relationships with public officials or persons in charge of a public service** - operating on behalf of the Public Administration, legislative bodies, EU institutions, any foreign State - with the courts, with public supervisory authorities, or with private partners who are concessionaires of a public service, must be initiated and managed **in strict compliance with the laws and regulations in force, with the principles laid down in the Code and in internal protocols**.

Conduct aimed at influencing the independence of judgement of the representatives of the Public Administration assigned to carry out inspections and audits is forbidden. When applying for public funding, the Company is obliged to act in total compliance with the law and with any applicable regulations. **It is, therefore, prohibited to engage in misconduct such as, but not limited to:**

- **providing untrue information or omitting to disclose relevant facts**, where requested, that could mislead the Funding Bodies in their assessment of the documentation submitted;
- **allocating public contributions, grants and funding for purposes other than** those for which they were obtained;
- submitting to the Funding Bodies **information that is untrue and/or incomplete or bypassing legal/regulatory obligations**.

## TRADE UNIONS

The Bormioli Luigi Group **neither favours nor discriminates against any political or trade union organisation**.

The Group **refrains from making contributions**, under any form whatsoever, to **political and trade union parties, movements, committees and organisations, or to their representatives and candidates**, with the exception of those due under specific legal provisions.

The Company deals with the Trade Unions in a responsible and constructive manner, fostering a **climate of mutual trust and dialogue**, in the continuous pursuit of profitable industrial relations.



04  
section

GIVEAWAYS  
**AND DONATIONS**

## Giveaways and donations

The Bormioli Luigi Group **prevents and combats corruption** in all its forms in order to prevent it from becoming not only an illegal phenomenon, but also an obstacle to economic development, a threat to business activities and a distortion of competition, as well as an impediment to the maintaining of a sustainable environment and a risk to the Company's reputation.

It is, therefore, **prohibited** for all those who work **in the name and on behalf of the Company to accept, offer or promise, even indirectly, money, gifts, goods, undue services or favours** (also in terms of employment opportunities) in relations with public officials, persons in charge of a **public service or private individuals, or parties under investigation and/or charged with one of the offences listed in Legislative Decree 231/01**, in an attempt to influence their decisions, with a view to receiving more favourable treatment or undue services or for any other purpose.

**Only small gifts and giveaways are permitted, during festivities or organised events**, provided they are of **modest value**.

Any employee who receives gifts or favourable treatment from customers or suppliers that go beyond conventional courtesies must notify the Management, which will take the appropriate measures.

For the Company, taking an active and responsible part in the life of the communities in which it operates is a core value. Over recent years, the Bormioli Luigi Group **has promoted numerous initiatives and events to support community life** and raise awareness on socially relevant issues (see the section "Support for local communities").

**Donations** to third parties must be motivated by a **liberal spirit**, in order to promote the image of the Company. Before it can be approved, each donation must meet the required criteria of appropriateness, commensurateness and documentability.

**Recipients are prohibited from making contributions to organisations with which a conflict of interest could arise.** It is strictly prohibited - being totally at odds with the corporate culture - to engage in any actions **aimed at corruptive practices** of any kind towards third parties, private or public alike.

section  
05

PROTECTION  
**OF FAIR COMPETITION**



## Protection of fair competition

The Group **openly opposes any corruptive practices** aimed at obtaining unfair advantages, both with reference to relations with Public Administrations and Public Bodies in general (towards which **conduct of the utmost transparency** and integrity is essential), and with private parties.

To this end, the Company conducts itself in such **a way as to avoid anti-competitive practices, i.e. concerted practices that could affect trade**, the object of which is to prevent, restrict or distort competition within the market of the European Union.

Recipients shall refrain from actions or conduct against Community and national regulations designed to protect competition in relations with competitors, or with suppliers, customers and business partners.

Recipients shall refrain, by way of non-limiting example, from initiating contacts or agreements of an anti-competitive nature (e.g. cartel agreements), from engaging in or receiving any exchanges of confidential corporate information, from attending meetings or informal gatherings with an anti-competitive agenda or purpose, even if organised or proposed by the trade associations to which the Company subscribes.

section  
06

PROTECTION OF  
**INDUSTRIAL AND  
INTELLECTUAL PROPERTY**









## Protection of industrial and intellectual property

The term **“intellectual property”** refers to all the **patents, models, trademarks, know-how, domain names** and any third party processing that may fall entirely or partially within the above-mentioned categories.

The Group operates in full compliance with **the industrial and intellectual property rights legitimately held by the Company itself and by third parties**, as well as with the laws, regulations and agreements, also at European Union and/or international level, that protect these rights.

Given the importance of this issue for the Companies, the Group has adopted a **corporate procedure** that defines **roles, responsibilities and procedures for launching the production and marketing of new products** in order to protect their industrial and intellectual property rights.

Therefore, all personnel and any collaborators involved in the above process are obliged to comply with the provisions of the relevant company procedure(s). In particular, the Company recommends carrying out a **prior art analysis** and running a check on the **existence of the requirements** of the regulations in force, in or-

der to verify the pre-existence of the trademark, patent and/or model the Company wishes to file.

The Group orders its staff and collaborators to:

- **refrain** from any kind of conduct that could constitute the **infringement of industrial property rights, alteration or counterfeiting** of distinctive marks of industrial products, patents, industrial drawings or models, whether domestic or foreign, or the violation of intellectual works protected by copyright;
- **refrain from importing, marketing or otherwise using or disseminating industrial products with counterfeit**, mendacious or altered distinctive marks, or produced by infringing the rights of third parties;
- do their utmost **to guard intellectual property** with the **greatest care and attention**, disclosing it only when strictly necessary and with prior authorisation, within the context of confidentiality agreements.

07  
section

ANTI-MONEY LAUNDERING



# Anti-money laundering

Within the scope of their professional activity, the Company personnel must not engage in conduct involving the use, transformation or concealment of capital of illegal origin.

Within the scope of their professional activity, the Company personnel must not engage in conduct involving **the use, transformation or concealment of capital of illegal origin**. With reference to such conduct, it is a crime to replace or transfer money, goods or other benefits resulting from a non-culpable offence, or to commit or aid and abet the commission, in relation to such goods, of other transactions that serve to obstruct the identification of their criminal origin.

The Company **verifies** with the utmost diligence the **information available on all counterparties** with a view to ascertaining their respectability and the legitimacy of their activities before establishing any kind of business relationship.

This is also carried out through the **internal procedure of prior assessment of customers** that the Company adopts as a general criterion in its business relations. Any business relationships with parties that have not received a sufficient rating will have to be expressly approved by the President or his appointees and justified on the basis of objective parameters of judgement that also take into account any previous relationships.

In the context of the various relations established with the Company, the Recipients must not, in any way whatsoever or under any circumstances, be implicated in affairs connected with the **laundering and/or self-laundering of money** from criminal activities, money laundering or the receiving of goods or other benefits of illegal origin.

**Before initiating relations or stipulating contracts** with suppliers and other business partners, the Company carries out **a series of controls** to ensure that its counterparty does not have a registered office or residence or any other type of connection with countries considered to be non-cooperative (e.g. off-shore countries).

The Company does not make purchases which, on account of the conditions of the offer, give reason to doubt the lawfulness of the provenance of the money and/or goods in question. Neither does it enter into economic relations with parties who give rise to reasonable grounds for believing that they are engaged in unlawful activities. It is also forbidden to distort and/or omit any transactions that could generate an improperly recorded asset, liability, income or expense.

section  
08

COMMERCIAL  
AND CORPORATE  
TRANSACTIONS  
**AND ACCOUNTING RECORDS**

# Commercial and corporate transactions and accounting records

All **operations and transactions must be legitimate, correctly authorised, recorded, verifiable and consistent with the Company's objectives.**

In particular, it must be possible, at any time, to verify the decision-making process, authorisation and subsequent course of the operation or transaction itself.

**Accurate documentation** of the Company's operations and transactions is of paramount importance. Each operation must be backed up by proper documentary evidence so that the **characteristics of and reasons for the operation** can be checked, and the person who authorised, performed, recorded and verified it can be identified.

Any employees and parties acting on behalf of the Company are required to operate **diligently**, also in **purchasing, and in compliance with the principles of correctness, economic viability, quality and lawfulness.**

The preparation of any documentation, including accounting documents, must be carried out with common sense and in good faith.

In particular, the **accounting records** must be

drawn up in compliance with **the principles of transparency, truthfulness, completeness, clarity, reliability and reconstructability**, and must enable the drafting of a reliable and faithful picture of the company's situation. All Employees involved in the preparation of the financial statements and similar documents shall offer the utmost cooperation, complete and **transparent information, accurate processing and data**, compliance with the proper segregation of duties, reporting any conflicts of interest that might arise.

Any Recipients who become aware of any omissions, distortions or negligence in the accounts or in the documentation on which the accounting records are based, must report the facts to their superior.

The accounting records must be kept by the competent persons in accordance with the law and technical principles, and in compliance with accounting procedures.



section  
09

CONTROL BODIES,  
**AUDITING COMPANY**  
**AND OTHER STRUCTURES**

## Control bodies, auditing company and other structures

In relations with the **Company's Control Bodies** (Board of Statutory Auditors, Supervisory Body, Shareholders) and with the external **Auditing Company**, each structure or function of the Company, and each Recipient, shall comply, among other things, with the provisions of the Code, in accordance with their respective institutional roles.

Those **designated to carry out controls** must have free **access to the data, documents and information they need to carry out their work**. It is expressly forbidden to prevent or obstruct the performance of the control activities legally assigned to the auditing company or to other corporate bodies, or to seek to influence the independence of judgement of these persons in order to alter the representation of the Company's equity, economic and financial situation.

Requests for information, fulfilment of obligations and documentation must be processed promptly, with clear assumption of responsibility as regards the truthfulness, completeness and accuracy of the information provided. The data and documents requested must be made available in their entirety, in a timely manner.

The information thus supplied must be clear, accurate, complete, faithful and truthful, avoiding - and in any case reporting in the most suitable manner - any conflicts of interest that may have arisen.

# 10 section

DIGITALISATION  
**AND INFORMATION  
SECURITY**



## Digitalisation and information security

**IT tools** are a fundamental means of **supporting the pursuit of innovation and excellence** in terms of product quality and customer service.

As of 2019, the Group launched a transformation programme to implement **the Group's new IT system** in order to effectively support business processes and their evolution with a special focus on **innovation and information security aspects**.

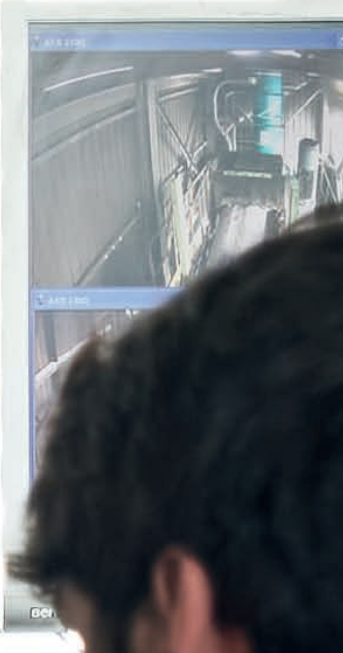
The design and implementation of the new information system is expected to achieve three key objectives in the years to come:

- **the harmonisation of processes** at Group level (Italy and abroad);
- the **covering** of these **processes** with **ICT solutions** at enterprise level (also with a view to resilience and business continuity);
- **the management of information security**, for both internal and external stakeholders (Cus-

tomers, Suppliers and other Stakeholders).

In addition to digital transformation, the Bormioli Luigi Group has firmly maintained its commitment to the **safeguarding and protection of data**, continuously improving measures to ensure the security of all the information flowing within the Group and to protect the information from unauthorised access, use, disclosure, interruption, amendment and destruction.

This transformation path will be backed-up by **training initiatives** not only concentrating on the best possible use of the new applications, but also on raising awareness on information security issues.



**BORMIOLI LUIGI** Composizione

Anagrafica Eventi Programmazione Evento

Registro Annulla

### Controlli Giornalieri

Turno	Lunedì 10/02	Martedì 11/02	Mercoledì 12/02	Giovedì 13/02	Venerdì 14/02	Sabato 15/02	Domenica 16/02
1	Avviamento Impianto	Avviamento Impianto	Avviamento Impianto	Avviamento Impianto	Avviamento Impianto	Avviamento Impianto	Avviamento Impianto
	Controllo Bilance	Controllo Bilance	Controllo Bilance	Controllo Bilance	Controllo Bilance	Controllo Bilance	Controllo Bilance
	Controllo Ricette Attive	Controllo Ricette Attive	Controllo Ricette Attive	Controllo Ricette Attive	Controllo Ricette Attive	Controllo Ricette Attive	Controllo Ricette Attive
	Controllo Mescolatore	Controllo Mescolatore	Controllo Mescolatore	Controllo Mescolatore	Controllo Mescolatore	Controllo Mescolatore	Controllo Mescolatore
	Controllo Bilance	Controllo Bilance	Controllo Bilance	Controllo Bilance	Controllo Bilance	Controllo Bilance	Controllo Bilance
2	Avviamento Impianto	Avviamento Impianto	Avviamento Impianto	Avviamento Impianto	Avviamento Impianto	Avviamento Impianto	Avviamento Impianto
	Controllo Bilance	Controllo Bilance	Controllo Bilance	Controllo Bilance	Controllo Bilance	Controllo Bilance	Controllo Bilance
	Controllo Ricette Attive	Controllo Ricette Attive	Controllo Ricette Attive	Controllo Ricette Attive	Controllo Ricette Attive	Controllo Ricette Attive	Controllo Ricette Attive
	Controllo Mescolatore	Controllo Mescolatore	Controllo Mescolatore	Controllo Mescolatore	Controllo Mescolatore	Controllo Mescolatore	Controllo Mescolatore
	Controllo Bilance	Controllo Bilance	Controllo Bilance	Controllo Bilance	Controllo Bilance	Controllo Bilance	Controllo Bilance

### Controlli Settimanali

Turno	Lunedì 10/02	Martedì 11/02	Mercoledì 12/02	Giovedì 13/02	Venerdì 14/02	Sabato 15/02	Domenica 16/02
1	BI 091	Piano Bilance pulizia	BI 093	Scegli NT4 - NT5 Nastri	Controllo e pulizia Nastri Magnetici	Piano Bilance pulizia	
2	Imp. erogazione acqua	BI 092	Scegli NT2 - NT3 Nastri	BI 094	Pulizia Nastri Erogazione	Piano Mescolatore pulizia	



# Implementing regulations of the Code

This Code of Ethics is an essential element of the Organisation, Management and Control Model adopted by the company pursuant to Legislative Decree 231/01 and subsequent amendments.

The Bormioli Luigi Group promotes **knowledge of and compliance with the Code of Ethics** and its amendments and additions among all Directors, Employees and Collaborators. The Company demands compliance and provides for **disciplinary or contractual sanctions** in the event of non-compliance.

All parties mentioned must be familiar with the contents of the Code of Ethics and must **report any violations of it that may come to their attention**.

The task of supervising the effective application of the principles of the Code of Ethics is entrusted to the **Supervisory Body**, set up within the framework of the **Organisation, Management and Control Model** adopted by the Company pursuant to **Legislative Decree 231/01** and duly vested with **autonomous powers of initiative and control**.

The Supervisory Body operates with **impartiality, authority, continuity, professionalism, autonomy** and with the full support of the top management of the Bormioli Luigi Group, with which it cooperates.

For the purpose of guaranteeing the correct application of the Code, while respecting privacy and individual rights, it has set up **information channels** through which anyone who becomes aware of any unlawful conduct within the Company can freely, directly and confidentially report it to the Supervisory Body.

This body is responsible for the **timely and attentive verification of the information transmitted**, in order to submit the case in question to the competent corporate function for the application of any disciplinary sanctions or the activation of contractual termination mechanisms.

With reference to the reporting of any actual, attempted or requested violation of the rules contained in the Code of Ethics and in the annexed protocols, the Company shall ensure that no-one in the workplace will be subjected to retaliation, unlawful influences, inconvenience or discrimination of any kind, for having reported to the Supervisory Body a violation of the contents of the Code of Ethics or of the internal procedures.





## Violation of the Code and sanction system

**Violation of the principles** laid down in the Code of Ethics and in the procedures of the internal protocols damages the relationship of trust between the Companies of the Group and their Directors, Employees, consultants, Collaborators in their various capacities, customers, suppliers, business and financial partners.

Such violations will, therefore, be dealt with by the Company sharply, promptly and immediately, through **appropriate and proportionate disciplinary measures**, independently of the possible criminal relevance of such conduct and the initiating of criminal proceedings, in cases where said violations constitute a criminal offence.

The effects of violations of the Code of Ethics and the internal protocols must be taken into serious consideration by all those who, for whatever reason, have relations with the Group; to this end, the Group shall disseminate the Code of Ethics and the internal protocols and provide information on the sanctions triggered in the event of violation and on the methods and procedures for imposing them.

In order to protect its image and safeguard its resources, the Company will not enter into relations of any kind with parties who **do not intend to operate in strict compliance with the regulations in force, and/or who refuse to behave in accordance with the values and principles laid down in the Code of Ethics and comply with the procedures and regulations provided for in the annexed protocols.**

## Management of whistleblowing reports

For the purposes of full **compliance with and application of Legislative Decree 170/2017**

(Provisions for the protection of whistleblowers who report offences or misconduct of which they become aware in the context of private or public employment), the Group urges all Employees and Collaborators to take an active part in the promotion of corporate values by **reporting any violation of the principles expressed in the Code** as well as any **unlawful conduct** of which they may have become aware in the performance of their corporate activity, and any violations of the Company's Organisation and Management Model, as provided for by the "Procedure for reporting to the Supervisory Body" (so-called "whistleblowing").

The Company **safeguards the confidentiality of the report and the identity of the whistleblower**, guaranteeing that the reporting will not lead to potential dismissal or to any form of retaliation, discrimination, penalisation, direct or indirect, for reasons connected with the report, and provides for disciplinary measures against anyone engaging in discriminatory conduct or harassment of whistleblowers.

If the whistleblower feels that they have been subjected to discrimination as a result of reporting a violation, they should inform the Supervisory Body, which will investigate the existence of such discrimination and duly inform Top Management.







**BORMIOLI LUIGI**

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GLASSMAKER



[www.bormioliluigi.com](http://www.bormioliluigi.com)

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