



UNIVERSAL PACK SRL- SUPPLIERS CODE OF CONDUCT

INTRODUCTION

Universal Pack has adopted the principle of combining the goal of economic profit with the achievement of social and environmental objectives.

It has chosen, within the framework of its corporate management, to adhere to and respect the ethical and moral values defined on the basis of the principles of fairness, responsibility, honesty and transparency, in compliance with the best practices and highest reference standards.

As part of this commitment, Universal Pack requires all its suppliers, subcontractors and sub-suppliers (hereinafter, jointly, the “Suppliers” and individually, the “Supplier”) to comply with this Code of Conduct.

It is understood that this Code requires, in any case, compliance with national laws and international agreements, as well as other applicable laws.

Universal Pack requires all its Suppliers to comply with rules and standards regarding sustainability, adopting behaviors based on rules of good conduct and corporate ethics. The Universal Pack Code of Conduct for Suppliers is an integral part of Universal Pack's purchase contracts and constitutes a prerequisite for all future collaborations.

Suppliers are required to comply with the following requirements:

a) Human rights

A Supplier to Universal Pack is required to:

- Respect the personal dignity, privacy and rights of each individual
- Refuse to make any person work against his or her will;
- Prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative;
- Universal Pack Suppliers shall recognize the right of employees to associate freely and must comply with all local laws governing the right of employees to select or not to select workplace representatives.

b) Labor conditions

Suppliers shall ensure fair labor conditions. In particular, Suppliers shall:

- Refrain from employment discrimination based on gender, age, ethnicity, nationality, religion, disability, union membership, political affiliation or sexual orientation;



- Not tolerate or use child labor in any stage of your activities other than in accordance with all applicable laws and regulations;
- Not use any forced labor, including but not limited to involuntary prison labor, victims of slavery and human trafficking and allow all employees the choice to leave their employment freely upon reasonable notice;
- Compensate employees fairly and follow local wage regulations and/or collective agreements, and where these do not exist, compensate employees to ensure that basic needs are met and that living standards respect the dignity of the individual;
- Ensure that working hours, including overtime, do not exceed applicable legal requirements;
- Ensure that employees are allowed at least one uninterrupted day off per week;
- Maintain a clean, healthy and safe workplace. Work areas must be of a standard to prevent accidents, injuries and illnesses, and to ensure an adequate level of sanitation.

c) Environment

Universal Pack is committed to respecting the environment all throughout the value chain and expects the same from its Suppliers. Suppliers are required to:

- Comply with all applicable environmental laws and requirements;
- Ensure that the environmental permits and approvals for the conduct of regulated activities are obtained and maintained;
- Ensure proper management and disposal of hazardous materials;
- Strive to reduce the releases of contaminants to air, water and soil;
- Strive for the protection of natural resources and wildlife;
- Work towards the prohibition or restriction of specific substances; promote the recycling of materials.

d) Business ethics

Suppliers shall conduct their business in an ethical manner. In particular, they shall:

- Refrain from any and all forms of corruption, extortion and bribery, and specifically ensure that payments, gifts or other commitments to customers (including Universal Pack employees), government officials and any other party are in compliance with applicable anti-bribery laws;
- Adhere to anti-trust and other competition laws;
- Disclose to Universal Pack information regarding potential conflicts of interest relating to their activities as Universal Pack suppliers, including disclosure of any financial interest a Universal Pack employee may hold in their business;
- Protect all confidential information provided by Universal Pack and its respective business partners;
- Respect intellectual property of others, including Universal Pack;
- Adhere to international trade regulations and export control regulations.



e) Remedies

Where any non-compliance with this Code is reported by Suppliers or assessed by Universal Pack, Universal Pack could ask the Supplier to plan and implement any necessary corrective actions. Universal Pack reserves the right to terminate any relationship or agreement with Suppliers refusing to take corrective actions within a reasonable period of time, without any prejudice to any other rights and remedies set forth by the applicable law and consequential to such termination.

SUPPLIER _____

Name _____

Title _____

Date _____

Company stamp and signature
