

# Confezioni Gallia Srl

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## INTRODUCTION

CONFEZIONI GALLIA conducts its activities with the utmost transparency and ethical integrity, guided by moral soundness and fairness, pursuing its corporate objectives in full respect of its company mission.

All individuals connected to CONFEZIONI GALLIA, and therefore subject to this Code of Ethics, are required to demonstrate complete moral integrity and alignment of values in all actions undertaken on its behalf.

Transparency and moral integrity form the foundation of CONFEZIONI GALLIA's ethical framework.

## Nature

This Code of Ethics is an autonomous instrument adopted by CONFEZIONI GALLIA and applicable on a general basis, with the purpose of expressing and implementing the principles of corporate conduct that the Company recognizes as its own and whose observance it requires from:

- Company Representatives
- Employees
- Collaborators

This instrument identifies the set of values that constitute the Company's social ethics, the guiding principles and the fundamental directives to which corporate activities and the conduct of all individuals subject to the Code must conform, within their respective roles and responsibilities inside CONFEZIONI GALLIA.

It is addressed to everyone operating within or connected to the Company, so that the Ethical Principles inspiring the organization are clear, unequivocal and understandable.

The Code of Ethics is the official document defining the Ethical Principles that CONFEZIONI GALLIA upholds, reflects and expects all parties with whom it interacts to follow consistently.

It is also a living document, subject to continuous development, to which all recipients may contribute in terms of improvement and evolution.

In particular, the adoption of this Code arises from the shareholders' intention to:

- express the ethical commitments and responsibilities undertaken in conducting business and corporate activities by all professional roles within the Company;
- strengthen and highlight the existing value of teamwork aimed at achieving shared objectives;
- establish behavioral standards and related disciplinary criteria designed to prevent offenses connected to CONFEZIONI GALLIA's activities or carried out in its interest;
- identify internal control measures and tools suitable for monitoring compliance with the Code;
- create value;
- help ensure that the activities and conduct of everyone operating within or connected to CONFEZIONI GALLIA are carried out in accordance with the values of impartiality, confidentiality and transparency.

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## Objectives

The objectives pursued by this Code of Ethics are not limited to legal or economic considerations but stem from a clear social and moral commitment that has always distinguished the Company's corporate integrity.

CONFEZIONI GALLIA adopts a Code based on the following principles and standards of conduct:

- operating in full compliance with the law and ensuring that all individuals subject to this Code observe applicable regulations, preventing any form of unlawful or improper conduct;
- avoiding any behavior that could facilitate or even indirectly suggest the commission of unlawful acts, undermine stakeholder trust or compromise transparency, or disturb the workplace environment.

## Relations with Institutions

With regard to Institutions, the Company guarantees that it will:

- operate within established and shared rules, making its objectives clear and transparent;
- carry out its activities ensuring maximum confidentiality;
- reconcile its objectives with broader social needs.

## Relations with Stakeholders

With regard to Stakeholders, CONFEZIONI GALLIA guarantees that it will:

- provide accurate information regarding operations that may influence stakeholder decisions;
- prepare financial statements and all mandatory documentation in a clear, transparent, truthful and accurate manner;
- act loyally, avoiding conflicts of interest;
- ensure confidentiality of information received in compliance with privacy regulations.

Stakeholders are defined as all those who maintain an ongoing dialogue with CONFEZIONI GALLIA and who contribute to the generation of its value, sharing common objectives.

## Recipients

This Code of Ethics is binding for all Collaborators.

CONFEZIONI GALLIA also requires all affiliated or subsidiary companies and primary suppliers to act in accordance with the general principles of this Code.

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Specifically, recipients of the Code — required to observe its principles and subject to sanctions in case of violation — include all natural and legal persons who hold positions of representation, administration or management within the Company or its organizational units, as well as those who exercise management and control functions, whether formally or in practice, and all those working toward the Company's objectives.

Employees and occasional collaborators are likewise subject to the Code and its potential sanctions.

Consultants, suppliers, partners and anyone acting in the name of or on behalf of CONFEZIONI GALLIA, or under its control, are also subject to its principles and related sanctions.

Shareholders, consultants and partners not acting on behalf of the Company, as well as stakeholders such as customers, lenders, the community and public administrations, are not formally bound or subject to sanctions. However, adherence to the principles of this Code may be considered a selection criterion when establishing business relationships.

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## GENERAL ETHICAL PRINCIPLES

This Code of Ethics has been developed to ensure that the fundamental Ethical Principles of CONFEZIONI GALLIA are clearly defined and constitute the foundation of the Company's corporate culture, as well as the standard of conduct for all Collaborators in the management of business and corporate activities.

### The Mission of CONFEZIONI GALLIA SRL

The mission of CONFEZIONI GALLIA is to pursue excellence in the services and products covered by our contracts, in compliance with the principles set out in the Corporate Policy, enhancing expertise and innovation through growth initiatives while maintaining strategic alliances and partnerships with key players in our reference market.

### Relations with Stakeholders

CONFEZIONI GALLIA does not limit its sphere of action to its internal environment. It constantly engages with the external context, ensuring that its conduct toward the market — and particularly within its system of stakeholder relationships — is based on the highest standards of fairness and loyalty.

CONFEZIONI GALLIA aims to maintain and develop strong relationships of trust with its stakeholders, meaning those individuals, groups or institutions whose contribution is necessary to fulfill its mission or who have an interest in its achievement.

In particular, stakeholders include those who invest in activities relevant to the Company's business, first and foremost shareholders, as well as Collaborators, Customers, Suppliers and Business Partners.

More broadly, stakeholders also include all individuals, groups, organizations and institutions whose interests are influenced by the direct or indirect effects of CONFEZIONI GALLIA's activities, including the local and national communities in which the Company operates.

This Code is inspired by an ideal of cooperation aimed at mutual benefit among the parties involved, while respecting each party's role.

CONFEZIONI GALLIA therefore requires each stakeholder to act toward the Company according to principles and rules consistent with the same ethical standards.

### Ethics in Conducting Business and Corporate Activities

The Company is committed to maintaining a strong link between its ethical identity and the quality of the services and products it offers, believing that these two values must progress together in the face of innovation challenges.

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In conducting its business and corporate activities, CONFEZIONI GALLIA bases its actions on fundamental principles such as transparency and clarity of information, integrity, legality, respect for human dignity and loyalty.

## Transparency and Clarity of Information

CONFEZIONI GALLIA adheres to the principle of transparency and completeness of information in carrying out its activities, managing financial resources and in related reporting and accounting records.

Collaborators are required to provide complete, transparent, understandable and accurate information so that stakeholders, in establishing relationships with the Company, can make autonomous and informed decisions, aware of the interests involved, available alternatives and relevant consequences.

In particular, every contract must clearly and transparently specify to the counterparty the behaviors expected under all foreseeable circumstances.

No employment relationship can be considered valid if it is not characterized by transparency and clarity of information.

## Integrity

CONFEZIONI GALLIA is committed to ensuring impartial conduct, avoiding preferential treatment and service disparities, refraining from undue pressure and adopting initiatives and decisions with maximum transparency, avoiding the creation or exploitation of privileged situations.

CONFEZIONI GALLIA establishes fair commercial relationships with third parties, long-term relationships with Customers and Suppliers, and proper recognition of the contribution made by its Collaborators.

## Legality

Collaborators are required to comply with applicable laws and regulations, this Code of Ethics and internal Company policies, applying them with integrity and loyalty.

Practices such as corruption, bribery, unlawful favors, improper payments, collusive behavior, and the direct or indirect solicitation of personal or career advantages — including those aimed at achieving promotions or changes in roles — whether for oneself or for others, are strictly contrary to CONFEZIONI GALLIA's principles.

Under no circumstances may the pursuit of the Company's interests justify dishonest conduct.

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## Human Resources

CONFEZIONI GALLIA acts in respect of the fundamental rights of every individual, safeguarding moral integrity and ensuring equal opportunities.

The Company seeks to maintain a positive working environment in which everyone can operate in compliance with laws, shared principles and values.

CONFEZIONI GALLIA does not tolerate any form of isolation, exploitation or harassment based on discrimination, whether personal or professional, by any Collaborator toward another.

Any form of discrimination based on race, language, color, religion, political affiliation, nationality, ethnicity, age, gender, sexual orientation, marital status, disability, physical appearance or socio-economic status is strictly prohibited.

No privileges linked to the above factors are permitted, except where required by law.

CONFEZIONI GALLIA prohibits disciplinary sanctions against Collaborators who legitimately refuse to perform tasks improperly requested by any person connected to the Company.

Collaborators are an essential factor in the Company's success. For this reason, the Company protects and promotes the value of its human resources in order to enhance and strengthen the skills and competitiveness of each individual.

## Loyalty

CONFEZIONI GALLIA upholds loyalty as a fundamental value in every relationship, both internal and external to the Company, ensuring fidelity to given word, commitments and agreements, even in the absence of written proof.

Each Collaborator must be aware that the achievement of established objectives is directly proportional to the level of responsibility and loyalty invested.

## Work Ethics, Protection and Enhancement of Collaborators

The work ethic embraced by CONFEZIONI GALLIA views the professional environment as constantly improvable. It does not remain confined to a static concept of moral status quo, but instead promotes progress, quality improvement and the enhancement of the professional dignity of its Collaborators.

The Company's vision of ethical work is forward-looking. It does not focus solely on the present but adopts a long-term perspective.

Technology in itself is neutral and impersonal. Ethics, by contrast, is personal and interpersonal.

To reconcile this apparent contrast, CONFEZIONI GALLIA bases its policies on directing technology toward ethically responsible uses and promoting fair distribution of resources and wealth.

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The primary objective is to pursue ethical profit, not profit in isolation. Within this framework, the protection and enhancement of Collaborators are fundamental, as they form the community around which the meaning of profit is defined.

This Code is therefore not only a set of behavioral rules required to ensure sound workplace ethics, but also tangible evidence of the Company's commitment to investing in individual moral growth and awareness.

## **Commitment to Continuous Improvement**

Collaborators commit to consistently applying the best of their acquired skills, while remaining aware of the need to continuously improve through Company-provided tools and personal initiative.

CONFEZIONI GALLIA believes that healthy competition, understood as a drive toward improvement, is an essential factor for development and progress, particularly within a teamwork context.

Collaborators are encouraged to pursue improvements both individually and collectively, with special attention to effective time management and decision-making capabilities.

Through this approach, the Company strives for excellence from the individual level up to the corporate level.

## **Equal Opportunity Protection**

Recognition of results achieved, professional potential and demonstrated competencies represent the cornerstones of professional development.

Recruitment, training, management and professional growth are carried out without discrimination and based exclusively on merit, competence and professionalism.

By adhering to these principles and rewarding solely according to objective criteria, CONFEZIONI GALLIA ensures equal opportunities and manages career progression and remuneration policies transparently and fairly, in alignment with market standards.

## **Professional Development**

CONFEZIONI GALLIA provides all Collaborators with appropriate tools and opportunities for professional growth.

Learning and training are considered permanent processes through which knowledge is acquired, change is effectively interpreted, new ideas are developed, productivity is enhanced and both individual and corporate growth are achieved.

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## Confidentiality

CONFEZIONI GALLIA guarantees the confidentiality of all information in its possession and refrains from seeking confidential data unless expressly authorized and in compliance with applicable regulations.

Collaborators, even after termination of employment, must not disclose or misuse confidential information acquired during their employment.

All confidential information must be used exclusively for institutional purposes and in a manner that prevents economic or moral harm to the parties concerned.

## Absence of Conflict of Interest

To ensure transparency and fairness and to preserve the trust of Investors and Customers, CONFEZIONI GALLIA, through a dedicated Supervisory Committee, ensures that Collaborators do not operate in situations of conflict of interest.

Collaborators must ensure that all business decisions are made in the interest of the Company and free from personal economic interests that may interfere with their professional role.

CONFEZIONI GALLIA safeguards the independence of judgment and decision-making of each Collaborator.

## Protection of Health and Personal Well-being

CONFEZIONI GALLIA considers its Collaborators a primary asset and promotes their involvement in Company activities by offering services that improve quality of life and fostering a work environment based on attention, listening, trust and professional recognition.

The Company promotes working conditions that protect psychological integrity, encourage creativity, active participation, teamwork and accountability.

It also safeguards moral integrity by preventing psychological violence and combating any form of discrimination or offense against individuals or their ideas.

All forms of sexual harassment, mobbing, bossing and inappropriate verbal behavior are strictly rejected.

Anyone who believes they have been subject to such conduct must report the matter to their supervisor, who will assess any violation of this Code.

## Commitment to Sustainable Development and Responsibility Toward the Community

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The professional commitment of Collaborators cannot be separated from the alignment of their objectives with those of the Company, which in turn recognizes, respects and safeguards the ethics and moral values of its Collaborators.

CONFEZIONI GALLIA places innovation at the core of its activities, recognizing that innovation requires a high degree of organizational dynamism and careful attention to the people who are part of the Company, as well as to Customers and Investors.

At CONFEZIONI GALLIA, innovation does not concern only the strictly technological dimension, but also the sphere of human relationships.

To this end, the Company integrates technological values with ethical ones, fostering an internal climate of widespread trust, from which greater operational efficiency naturally derives, based on synergy between individuals and the enterprise.

The key element underlying the desire to promote environmental awareness lies in the connection between economic imperatives and ethical values.

Through this Code, CONFEZIONI GALLIA acknowledges the value of the social dimension and believes that it can only be expressed through individual responsibility.

The Company is not an isolated entity indifferent to the social and systemic fabric of the local or global context in which it operates. Rather, it exists in a continuous state of exchange with its environment: it receives, processes and conveys messages outward.

## **Promotion of Sustainable Development**

CONFEZIONI GALLIA is committed to promoting and consolidating a strong environmental culture and awareness, operating in full compliance with applicable laws and applying the best available technologies.

The guiding principle of the Company is rooted in the desire to create and maintain a healthy environment within the organization, extending this commitment to the broader objective of preserving the environment for future generations.

CONFEZIONI GALLIA plans the development of its activities with constant attention to the enhancement of natural resources and the promotion of initiatives aimed at widespread environmental protection.

## **Responsibility Toward the Community**

CONFEZIONI GALLIA contributes to social development by combining the objective of economic efficiency with the goal of increasing the social value of the services provided.

The Company does not adhere to a narrow or one-dimensional model of progress. Instead, it embraces the role of facilitator of broad and inclusive development and well-being for the community as a whole.

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On this basis, the Company is able not only to respond to the needs of the community, but also to contribute actively to economic, social and civic development.

## **Ethics of Communication and External Relations**

The Company considers it a fundamental and non-negotiable value to communicate its corporate image with clarity, fairness and diligence in all communications and external relationships.

It is continuously committed to establishing conditions of transparent communication in which it is not possible to disseminate false information or manipulate data concerning the current state and future development of technologies, in order to avoid not only generating misleading assessments but also creating unrealistic or inappropriate expectations.

## **External Communication**

External communications must be truthful, clear, accurate and transparent.

Under no circumstances is it permitted to disseminate false or misleading information or commentary.

All communication activities must comply with applicable laws, regulations and professional standards of conduct, ensuring maximum clarity, transparency and timeliness, while safeguarding privacy where required.

To guarantee completeness and consistency of information, relations between CONFEZIONI GALLIA and media organizations are reserved exclusively to senior management.

## **External Relations**

Relations with public institutions, interest groups, the press and mass media in general, as well as all institutional communications concerning the Company, must be handled exclusively by those responsible for such functions or by individuals expressly authorized by top management.

Should an individual Collaborator be contacted by a representative of any media organization, they must promptly inform the appropriate Company representatives before providing any information.

Any form of pressure or attempt to obtain favorable treatment from the media is contrary to the principles of CONFEZIONI GALLIA.

## **RULES OF CONDUCT**

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This section sets out in detail the Rules of Conduct in order to clearly define the behaviors to which all individuals operating with CONFEZIONI GALLIA must adhere in carrying out corporate activities, in full and conscientious compliance with the Principles of the Code of Ethics.

## Internal Communication

The Company considers internal communication a fundamental value and a crucial starting point for the effectiveness and efficiency of corporate processes. It contributes to the sharing of values, strategies and objectives among all Collaborators and facilitates the exchange of information and experience.

It is the responsibility of each department and manager to promote internal communication through appropriate management of interpersonal relationships with their Collaborators. This begins with leading by example and ensuring opportunities for dialogue and listening, both individually and collectively.

With regard to the internal dissemination of the Code of Ethics, the Company undertakes to provide a printed copy to each Collaborator following a dedicated presentation meeting and to make it publicly available through the Company's website.

## Integrity and Protection of Relationships

To ensure conduct based on integrity and seriousness toward third parties, particularly those in positions of vulnerability or limited knowledge, the Company undertakes not to provide misleading information and not to engage in conduct aimed at obtaining unlawful or deceptive advantages.

The Company ensures that the description of any result achieved is based entirely on factual merit.

Furthermore, no Collaborator may use their position within the Company to obtain personal advantages or benefits in external relationships, including those of a private nature.

## Denigration of Competitors

CONFEZIONI GALLIA considers it generally counterproductive to describe its products or services based on comparisons with those of competing companies.

The only acceptable method of promoting the Company's products or services is to emphasize their value and quality, refraining in all circumstances from disparaging competitors.

If a Customer explicitly requests comparisons with competitors' products, it is permissible to highlight the advantages of the Company's products and services, provided that such comparisons meet criteria of fairness and accuracy. Nevertheless, it remains preferable for the Customer to independently evaluate and verify any comparisons between competing products and services.

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False or misleading statements capable of damaging competitors are always considered unacceptable.

## Honesty in Relationships

All external relationships, relationships with Collaborators and relationships among Collaborators must be based on the highest standards of loyalty. This includes honoring commitments, acting responsibly, protecting corporate assets and adopting a complete attitude of good faith in every activity and decision.

In all professional relationships, Collaborators are required to diligently comply with applicable laws, this Code of Ethics and internal regulations.

In the event of dishonest conduct by a Collaborator, CONFEZIONI GALLIA undertakes to apply the necessary sanctions following careful and balanced verification of the misconduct.

## Funding, Contributions or Grants

Through its Supervisory Committee, CONFEZIONI GALLIA monitors all its areas of activity to ensure compliance with applicable laws and to prevent any conduct that could lead to criminal or administrative sanctions.

Any funding, contributions or grants intended for specific projects are managed by Management in collaboration with the responsible department heads.

## Transparency in Communication

CONFEZIONI GALLIA undertakes not to create misleading impressions or provide false or biased information.

Collaborators must ensure correctness, completeness, consistency and timeliness of information, in accordance with legal requirements, best market practices and within the limits of protecting Company know-how and assets. No significant information may be omitted.

Ambiguous conduct, even if verbal, that could improperly influence or exaggerate the perception of the interlocutor is not permitted.

Clarity in communication is a fundamental criterion of ethical behavior.

If a Collaborator believes they have not clearly presented a product or service, they must promptly take the initiative to correct their statements.

## Respect for the Dignity of Individuals

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The Company respects fundamental human rights, safeguarding moral integrity and ensuring equal opportunities.

In both external and internal relationships, discriminatory behavior based on political or trade union opinions, religion, race, nationality, age, gender, sexual orientation, health status or any personal characteristic is not permitted.

## Relations with Ownership

CONFEZIONI GALLIA is committed to maintaining continuous dialogue with Ownership in compliance with applicable laws and regulations, recognizing that every Investor and potential Investor has the right to receive the same information in order to make informed investment decisions.

The Company considers it essential to provide Ownership with complete information regarding activities carried out and results achieved.

The Company safeguards and prioritizes the collective interest of Shareholders over the particular interest of any individual shareholder.

## Internal Control System

The Company considers a sound and effective control environment to be a fundamental aspect of its organizational culture. Its ultimate objective is to improve the efficiency and effectiveness of corporate relationships and to strengthen awareness and responsibility among all Collaborators.

CONFEZIONI GALLIA ensures the implementation of an Internal Control System, managed by the Supervisory Committee in collaboration with the various corporate structures responsible for specific processes.

This Internal Control System aims to guarantee:

- the achievement of corporate objectives;
- the safeguarding of corporate assets;
- the adoption of behaviors and processes that ensure compliance with applicable regulations and internal directives;
- the effectiveness, efficiency and cost-efficiency of corporate activities;
- the reliability and accuracy of information, including accounting and financial information, circulating within the Company or disclosed to third parties and the market;
- the confidentiality of corporate information not disclosed to the public.

## Accounting Transparency

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CONFEZIONI GALLIA considers transparency, accuracy and completeness of accounting information to be fundamental.

To this end, the Company is committed to organizing a reliable administrative and accounting system capable of correctly representing management events and providing tools to identify, prevent and manage, as far as possible, financial and operational risks, as well as fraud against the Company.

Accounting records and related documentation must be based on precise, comprehensive and verifiable information and must reflect the true nature of the underlying transaction, in compliance with external requirements such as laws and accounting standards, as well as internal policies, plans, regulations and procedures.

Accounting records must allow the Company to:

- produce accurate and timely economic, financial and asset statements for internal use, such as planning and control reports or management analyses, and for external purposes, such as financial statements and disclosure documents;
- provide tools to identify, prevent and manage financial and operational risks and fraud against the Company;
- carry out controls that reasonably ensure the safeguarding of assets and protection against losses.

Auditors must have free access to the data, documents and information necessary to perform their duties.

Collaborators must ensure that management operations are correctly and promptly recorded so that the administrative and accounting system can fulfill the objectives described above.

## Relations with Customers

Customer satisfaction and the quality of relationships with Customers are central to CONFEZIONI GALLIA's corporate policy, with a focus on building durable and communicative partnerships.

The Company aspires to active collaboration with its Customers in the design and production of innovative solutions and is committed to anticipating and responding promptly to changing Customer needs, fostering a culture that encourages the best contribution from every party involved.

To create and maintain such relationships, CONFEZIONI GALLIA undertakes to:

- avoid arbitrary discrimination among Customers or exploiting positions of strength to their disadvantage;
- operate within the framework of applicable laws and regulations;
- always honor commitments and obligations undertaken toward Customers;
- adopt a behavior style based on efficiency, cooperation and courtesy;
- provide complete information to enable informed Customer decisions;
- ensure truthfulness in advertising and all forms of communication;

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- require Customers to adhere to the principles of the Code of Ethics and, where provided by procedures, include an explicit contractual obligation to comply.

## Relations with Suppliers

Suppliers play a fundamental role in improving the Company's overall competitiveness. Equal opportunity, loyalty and impartiality are guaranteed for every Supplier.

Collaborators must select Suppliers based on the Ethical Principles set out in this Code and are encouraged to establish and maintain stable, transparent and collaborative relationships, always acting in the best interest of the Company.

Every Collaborator must promptly report to their superior any Supplier behavior that appears contrary to the Principles expressed in this Code.

## Relations with External Collaborators

The selection of External Collaborators is based on merit, competence and professionalism.

All External Collaborators, including agents, consultants, representatives and intermediaries, are required to strictly comply with the Principles set out in this Code of Ethics and, where provided by internal procedures, to include in their contracts an explicit obligation to adhere to it.

Any conduct by an External Collaborator that appears contrary to the Principles of this Code must be reported to the responsible manager or, in any case, to Company management.

Each internal Collaborator, within the scope of their duties, guarantees toward every External Collaborator a relationship based on utmost seriousness, loyalty, clarity in communication and professionalism, as well as conduct compliant with applicable laws and regulations.

CONFEZIONI GALLIA also ensures continuous attention to maintaining an appropriate balance between performance levels, quality of work, costs and delivery timelines in its relationships with External Collaborators.

## Relations with Public Officials, Political Representatives and Interest Groups

All relationships with public officials, representatives of political organizations and representatives of interest groups must be conducted with the highest standards of transparency and legality.

No Collaborator, even under unlawful pressure, may promise or provide sums of money, goods in kind or other personal benefits in order to promote or favor the Company's interests.

Any form of gift to public officials or their family members that could influence independence of judgment or induce the granting of advantages is strictly prohibited. This rule applies both to gifts offered and received.

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A gift is defined as any type of benefit, including promises of employment or similar advantages.

Gifts offered, except those of modest value, must be properly documented to allow verification and must be authorized by the relevant department manager.

## Relations with Competitors

CONFEZIONI GALLIA upholds principles of fairness and loyalty in all relationships with competitors.

No Collaborator may accept or participate in initiatives such as price or quantity agreements, market allocation, production limitation, tie-in agreements, boycotts or refusals to deal, which may constitute violations of competition and antitrust laws.

If representatives of competing companies propose agreements that appear to violate applicable regulations, the Collaborator must clearly express dissent and promptly inform the Legal Department.

## Confidential Information

Confidential information includes knowledge of projects, proposals, negotiations, pricing policies, corporate development strategies, commitments, agreements or events, even if future or uncertain, relating to the Company's business activities.

Accounting and financial data, including consolidated results, are considered confidential until officially disclosed to the public in accordance with applicable regulations.

All personnel data is also considered confidential.

Each Collaborator must:

- respect the confidentiality of information acquired in the course of their duties, even after termination of employment;
- access only documentation they are authorized to consult and use it in accordance with their official duties, granting access only to those entitled;
- ensure protection against data dispersion, comply with prescribed security measures, properly safeguard documents and avoid unnecessary duplication.

No Collaborator may disclose confidential internal information to family members or friends, even if the potential benefit would accrue to third parties connected to them.

Only institutional information, such as public brochures, may be disclosed. The disclosure of confidential information is reserved exclusively to authorized managers.

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## Privacy Protection

CONFEZIONI GALLIA guarantees the protection of personal data of each Collaborator. Any personal information provided is processed in compliance with applicable regulations.

If questions are asked regarding personal ideas, preferences or private life, Collaborators are entitled not to respond and may report the matter to the Human Resources Department.

## Health and Safety in the Workplace

CONFEZIONI GALLIA guarantees health and safety protection in the workplace for its personnel and third parties, complying with workplace safety regulations and promoting safety in all work environments beyond legal obligations.

## Conflicts of Interest

A conflict of interest refers to any situation in which personal interests, or those of connected individuals such as family members or friends, or organizations with which a Collaborator is associated, may compromise impartiality.

Collaborators must refrain from participating in decisions, procedures or activities that may generate conflicts of interest.

Anyone who becomes aware of a potential conflict must immediately inform their manager or Company management.

## Gifts

Offering money, significant gifts or personal benefits to Customers, Suppliers, Public Institutions or Officials in order to obtain undue advantages is strictly contrary to the principles of CONFEZIONI GALLIA.

Acts of courtesy, hospitality and modest gifts are permitted, provided their value does not exceed 30 euros.

Where appropriate, the Company may offer gifts in the form of charitable donations after informing the recipient.

Nothing must compromise the integrity or reputation of the parties involved or influence the independence of judgment of the gift recipient.

Likewise, no Collaborator may receive gifts or favorable treatment, except of symbolic value or justified by normal courtesy.

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If a Collaborator receives an inappropriate gift, they must immediately inform their manager so that it can be returned to the sender, accompanied by a written explanation of the Company's policy as stated in this Code.

## **Equal Opportunity, Professional Development and Remuneration**

Hiring and career advancement are based exclusively on objective and transparent criteria, including professional potential, results achieved and demonstrated competencies, ensuring equal opportunities and preventing favoritism.

CONFEZIONI GALLIA offers all Collaborators equal opportunities for improvement and professional growth under comparable conditions.

The Company promotes both practical and emotional involvement of Collaborators in corporate activities, viewing economic recognition as a natural completion of this process.

Theoretical training typically precedes practical training, although in some cases they may proceed simultaneously, under the guidance of a dedicated tutor.

The Company pays particular attention to the integration of new graduates and hires all personnel exclusively through regular employment contracts, not tolerating any form of undeclared work.

Regarding remuneration, the Company ensures a competitive salary structure aligned with the reference market, based on evaluation of professionalism, roles and results achieved.

Salary updates and determinations are based on clear and fair criteria and are communicated directly to the individuals concerned.

## **Anti-Money Laundering**

No Collaborator of CONFEZIONI GALLIA may be involved in transactions that could facilitate the laundering of proceeds from criminal or unlawful activities.

If a Collaborator becomes aware of such situations, even if not directly involved, they must promptly inform their manager and, where appropriate, the competent authorities.

## **Rules of Conduct within the Company**

CONFEZIONI GALLIA considers the application and sharing of certain behavioral rules essential, both in interpersonal relationships and in maintaining the Company's image.

All Collaborators must dress appropriately for the work context.

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Inappropriate or vulgar language is not permitted. Excessive expressions or emotional displays that do not respect the working environment should be avoided.

It is strictly prohibited to address colleagues in an offensive, threatening or disrespectful manner that may harm personal dignity or the Company's image.

All individuals working with the Company are committed to maintaining relationships based on respect, mutual availability, courtesy and protection of privacy.

## Use of Company Assets

Each Collaborator must feel responsible for protecting the resources entrusted to them.

Unauthorized alteration of Company assets is not permitted. For example, installing unauthorized software on Company computers is prohibited.

Waste and improper or personal use of Company assets are not accepted.

Expense reports will reimburse reasonable, actual and authorized expenses only.

Collaborators must promptly report any damage to Company property.

## Environmental and Social Responsibility

CONFEZIONI GALLIA develops its activities with constant attention to preserving natural resources and protecting the environment.

Its environmental policy is based on raising awareness among all Collaborators, starting with simple but meaningful actions such as recycling toner, paper and plastic, waste separation and energy conservation.

Although environmental risks such as pollution or contamination are more commonly associated with industrial activities, the Company considers active commitment to environmental, health and safety protection fundamental.

Through its business activities, the Company provides services and products directly usable by citizens, such as furnishings for libraries, schools and public institutions.

## IMPLEMENTING PROVISIONS

### Dissemination of the Code of Ethics

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Training and information regarding the Code of Ethics are essential organizational elements aimed at strengthening corporate culture, disseminating rules and procedures and reinforcing alignment with the Company's mission.

Managers, who bear primary responsibility for the Code, must:

- act in accordance with its Principles and serve as examples;
- ensure availability for clarification and interpretation;
- promote awareness that compliance with the Code is essential to work quality;
- select internal and external Collaborators who demonstrate reliability in adhering to the Code;
- report violations.

The Code is published on the Company's web platform and website.

Where necessary, an English translation of the Code will be prepared.

All new contracts must include explicit reference to the Code of Ethics.

## Supervisory Committee

CONFEZIONI GALLIA has established a Supervisory Committee responsible for managing all aspects related to dissemination and application of the Code.

The Committee receives, analyzes and verifies reports of violations, ensures confidentiality and proposes improvements.

Its responsibilities include:

- monitoring application and promoting continuous ethical improvement;
- overseeing communication and training initiatives;
- analyzing and integrating proposed policy revisions;
- reporting violations to the Board of Directors;
- proposing amendments to the Code.

## Reporting Violations

A specific internal procedure governs the submission of reports via email, reporting box or postal service.

The Supervisory Committee is responsible for analyzing each report and proposing corrective actions.

## Internal Sanctions

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Any violation of the rules contained in this Code will result in disciplinary measures proportionate to the seriousness of the offense and the damage caused, which may include termination of employment in severe cases.

All measures are implemented in compliance with applicable laws and collective labor agreements.