

Ethics Code

NOLANPLASTICA
GROUP

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Introduction

NOLANPLASTICA GROUP is committed to conducting its business in accordance with the highest ethical standards and the business conduct rules expressed in this Code.

All staff, without any difference or exception, as addressee of the code must inspire his/her business conduct to such principles as a company responsibility.

Respect of such ethical rules and the transparency in business conduct are in fact the fundamental conditions to enhance NOLANPLASTICA Group's reputation, its credibility and its success in the markets where it operates.

Saviano, January 2015

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CORE PRINCIPLES

1.1 Legality

NOLANPLASTICA Group is committed to complying with all governmental laws, rules, regulations and administrative practices applicable to its operations in all those countries and communities where it is going to operate.

Accordingly everyone of its employee has an important responsibility to know and follow the laws that apply wherever the Group works.

No one has the authority to direct or authorize anyone to violate any applicable law, rule, regulation or administrative practice.

1.2 Fairness and transparency

All staff must conduct his business activity honestly and ethically both with customers and supply, based on principles of fair business conduct, good faith, and integrity. We expect the same of all with whom we conduct business.

1.3 Diligence and Professionalism

Every employee is asked to operate in a diligent, competent and loyal manner, using adequately his/her competence and time while doing his job, inspiring his/her conduct to the respect of the mutual co-operation.

Everyone, as for the responsibilities of his role, must operate with the maximum level of professionalism to better satisfy customers requirements, contribute to the achievement of the company objectives.

All decisions must be inspired to principles of a correct and prudent management, evaluating the potential risks.

1.4 Impartiality and equal opportunity

All staff must operate impartially avoiding favouritism and treatment's inequality regards specific group or single individuals, and avoiding any form of oppressive conduct and discrimination for reasons related to their race, colour, sex, legal status, physical disability, religion, national origin, cultural views, political and or trade union opinions, and so on.

It is the policy Group to provide equal employment opportunities in conformance with all applicable laws and regulations to individuals who are qualified to perform job requirements.

1.5 Equity of the authority

NOLANPLASTICA Group is committed to guarantee that the exercise of the authority inside the hierarchical relations is always inspired to equity and fairness criteria.

In particular, the concerned Directors check that the exercise of authority does not translate in an abuse of power that could damage employees and/or external agents dignity and autonomy in their choice of work organization.

1.6 Confidentiality of information

Employees must not disclose confidential information related the Group business strategies and its customers to persons outside the company. In order to protect confidential information, all must take reasonable steps to ensure that it can not be intentionally or inadvertently discovered by persons outside the company.

All information must not be used to get improper personal benefits directly or indirectly. The safeguard of confidential information is an obligation that continues even after employee leaves the Group.

Furthermore, everyone must respect the private policy system to protect personal data of customers, suppliers, or other third parties.

1.7 Conflict of interest

NOLANPLASTICA GROUP reputation and credibility depends on the continued trust of its customers and suppliers. Conflicts of interest, or the appearance of such conflicts, undermine GROUP 's good name. A conflict of interest arises in any situation in which every employee use his/her contacts or position in the company to advance his/her personal interests, private business interests or financial interests, whether or not at the expense of the company.

Everyone must avoid any situation that would create a conflict, or appearance of conflict, between his/her private interests and the interests of the GROUP.

1.8 Environmental policy

NOLANPLASTICA GROUP believes in the possibility of a sustainable development and considers the safeguard and respect of the environment as a fundamental value.

Accordingly, the policy Group is to manage its business by preventing incidents, reducing emissions and wastes and emphasizing every employee's responsibility in environmental performance.

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PERSONNEL AND WORK ENVIRONMENT

2.1 Human resources

We are committed to the best humane workplace practices and to conform to all requirements of the SA8000 standard in addition to all Italian State, and abroad Local employment laws.

At NOLANPLASTICA human resources represent an invaluable element for the existence, development and the success of the company itself that is committed to developing personnel skills and stimulating the abilities of every employee in order to promote their professional growth.

Staff recruitment is based only on merit, competence and professional criteria.

Regular and constant are the training initiatives for personnel. They are based on the individual skills of every employee without any discrimination in order to increase their competences.

2.2 Safeguard of Workers Rights and dignity

NOLANPLASTICA GROUP guarantees work conditions respectful of the individual dignity and of the Workers rights in a safe workplace.

It is the policy of the Group to prohibit any form of harassment by or towards employees, and in any company workplace. The objective of this policy is to provide a work environment that fosters mutual employee respect and working relationships free of harassment.

2.3 Child and forced Labour

It is NOLANPLASTICA GROUP policy to respect the fundamental rights of workers in Italian plants and abroad codified in the local laws and by the International Labour Organization. These rights include freedom of association, prevention of forced and child labour, non discrimination and equal remuneration for equal work.

2.4 Drugs and alcohol in the workplace

Work requires clear thinking and often the ability to react quickly. Being under the influence of alcohol or drugs, or improperly using medication, diminishes an employee's

ability to perform at his or her best. That's why the rules of the Group strictly forbid abuse of drugs and alcohol. Violation of these rules are taken very seriously.

2.5 Health, Safety and Security

NOLANPLASTICA GROUP is committed to provide its staff with a safe and secure work environment. Its policy is to identify and evaluate health risks related to the manufacturing operations that could affect its employees, to implement programs and appropriate protective measures to control such risks and to comply with all applicable laws and regulations (Italian decree n° 626/94), in fact of preventing and monitoring possible safety risks.

All employee is obliged to respect and follow the safety measures when doing their job and to inform their Supervisor or the competent Manager about something that could prevent a damaging event for workers personal health.

2.6 Company assets use

In general, employees are expected to make proper and efficient use of NOLANPLASTICA GROUP assets. This last include office supplies, computer and telephone equipments, copying machines and computer software.

Company assets must be used for business purposes only.

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THE ETHICAL CONDUCT RULES

3.1 Transparency in communication

Clearness in communication of an information is fundamental.

So every employee, in the limit of the safeguard of the Group know how, is asked to inform customers in a correct and accurate manner.

3.2 Relations with Customers

NOLANPLASTICA Group recognizes that its customers satisfaction is the fundamental element for its success. Our staff is asked to treat all customers equitably and do not discriminate by customer size, type or business strategy.

Personnel is asked to be always available as for clients enquiry or problems and must operate efficiently. According to that, and on the basis of what established by the International rules ISO 9001:2008, a regular check of customers satisfaction level is done.

3.3 Relations with Suppliers

NOLANPLASTICA GROUP allows suppliers to compete equitably in an impartial manner. Suppliers' selection is done not just considering prices level, but also quality product and punctuality in delivery terms.

3.4 Relations with Government, Institution, Political Parties and Trade-Union Organization

Relations with Government Institution must be inspired to the principles of fairness, impartiality and objectivity and they are reserved to the concerned company Manager. It is seriously prohibited to receive and/or to offer unduly or to promise directly or indirectly state officers and/or employees benefits or gifts.

NOLANPLASTICA GROUP does not give any contributions to political candidates or parties and trade union organizations. The GROUP does not support any direct or indirect pressure to political candidates, and it does not accept any recommendation for recruitment, consultancy contracts and other things. All staff (Directors, officers and employees) engaging in political activities are expected to do as private citizens outside the Group offices or plants and not as one of its representatives. Company assets shall not be used to make a political contribution.

The Group respects Workers rights to form and adhere to the trade union chosen by themselves. Trade union activity is not prohibited and/or hampered and all workers are free of meeting in the work places to exercise their rights.

3.5 Accuracy of Financial Report

Accounting transparency is the fundamental assumption for an efficient check and it is based on informations' accuracy, truthfulness and completeness.

So all financial statements and books, records and accounts of the Company- whether held electronically or in print-must reflect transactions and events accurately and conform both to legal requirements, accounting principles and also to the Company's system of internal accounting. Dishonest reporting within the Company, or to organizations or persons outside the Company, is strictly prohibited.

3.6 Gift and entertainment policy

The giving and receiving of gifts is common business practice. But it is our company policy to prohibit to offer, directly, indirectly and or privately, money, gifts or benefits of whatever nature to customers, suppliers, outside agents and to all who are in relation with the Group, in the scope to get illicit personal advantages.

Acts of common customary courtesies, as samples or forms of hospitality or entertainment to or from customers or suppliers are accepted under ethical business practice only when they are of a small value and they should not jeopardize integrity and good name of one of the parts, and or influence addressee's ability to make objective and fair business decisions.

Likewise employees can not receive samples, invitation or preferential treatments that exceed ordinary common courtesy relations and on condition they are of symbolic value.

In the other cases, employees must inform the concerned Directors.

3.7 Competition and fair dealing

NOLANPLASTICA Group main goal is to win customers for its products' quality and value and not by creating unfair disadvantage for the competitors.

We believe in the value of the free and fair competition that is essential for the development of the company welfare, its customers and suppliers. In all our dealing we comply with the legal requirements of antitrust laws.

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PROCEDURAL PROVISIONS

4.1 The Ethical Code in our Company

NOLANPLASTICA GROUP is committed to ensuring the greatest circulation of this Code with the objective to develop the consciousness on the importance of ethics value and the necessity to inspire the business conduct to the established principles.

Every employee will know of Code content through :

- a circular addressed to all staff;
- periodic training initiatives;
- code publication on Group web site.

4.2 Respect of the Ethical Rules

The respect of the ethical rules expressed in the present Code must be considered as a fundamental part of workers' contract obligation according to what established by the Italian Civil Code in fact of labour relations (articles n° 2104 and 2105).

4.3 Code Violation

Violation of the ethical principles could have serious consequences. Who will violate may run in a company disciplinary action, and also in a breach of contract primary obligation of business relations or illicit disciplinary, in the respect of the procedures provided by art. 7 of the Italian Workers Statute, with all consequences of law, including potential suspension without pay or termination of employment, and eventual compensation for damages deriving from the violations of ethic standards.

Of course any presumed violation of this Code must be immediately reported to the competent Directors who will adopt the related disciplinary measures according to what provided by the collective contract of employment and proportionately to the violation seriousness, eventual recidivism and the grade of guilt of the persons involved in.

The original version of this Ethics' Code is the Italian one. In case of any discrepancy with the Italian text, then the Italian version must be considered.