

09/04/2026

## Code of Ethics



PPM Industries SpA  
Premium Partners for tape  
Manufacturing

**Sede Legale**  
Via G. Terzi di S. Agata, 23  
24030 Brembate di Sopra  
(BG) Italy

**Sede Operativa**  
Via G. Carducci, 5  
24030 Presezzo  
(BG) Italy

T +39 035 332476  
contact@ppmindustries.com  
www.ppmindustries.com

CF e RI di Bergamo 02099620169  
Partita IVA IT02099620169  
REA BG - 262521  
Export - Import 027301  
Cod. SDI RWB54P8  
Cap. Sociale euro 2.812.650 i.v.

The **General Management** establishes this code of ethics of PPM Industries SpA for all its branches:

- Presezzo, Italy: Administrative and sales headquarters
- Brembate Sopra, Italy: Hot-melt adhesive tape coating and converting.
- Calusco d'Adda, Italy: Paper impregnation, solvent-based coating with natural rubber and water-based acrylic
- Dahej, India: Paper impregnation, solvent-based coating, and converting.
- Cannock, UK: Converting.
- Coral Springs, USA: Sales headquarters

The PPM Industries SpA code of ethics is defined within the vision and mission of the ATLAS Group, which the company joined in December 2024.

PPM Industries SpA is committed to implementing the principles contained in this document, which is communicated to all employees of the organization, its suppliers, and its customers, and is available to anyone upon request.

### Context

PPM Industries SpA's core principle is compliance with the laws and regulations in force in all countries in which it operates.

To advocate and promote this principle in the conduct of corporate affairs, the Company has adopted a Corporate Code of Ethics.

This Code of Ethics contains a series of principles of corporate ethics aimed at regulating corporate activities through rules of conduct.

In general terms, the Code contains the Company's rights, duties, and responsibilities towards its stakeholders (employees, customers, subcontractors, suppliers, public administration, shareholders, the financial market, etc.).

### Scope of Application of the Code of Ethics

The Code of Ethics applies to all levels of PPM Industries SpA, and therefore the Company's governing bodies and their members, employees, and collaborators are required to adhere to its principles.

The Company requires all affiliated or participating companies and all those who collaborate with it in any capacity (customers, suppliers, subcontractors, service providers, consultants, etc.) to comply with the provisions of this Code of Ethics in the applicable parts.

The Company declares itself free not to enter into or continue any relationship with anyone who demonstrates a disagreement with the content and spirit of the aforementioned Code of Ethics and violates its principles and rules of conduct.

Invia commenti

### **Rules of Conduct**

General principles of conduct in business management.

The Company's governing bodies and their members, employees, collaborators, agents, and generally all third parties operating on behalf of PPM Industries SpA are required to comply with applicable laws, regulations, this Code of Ethics, and the organizational and procedural rules adopted by the Company.

Under no circumstances may the violation of these principles be justified by the pursuit of the Company's interests.

### **Corporate Activities and Management of Financial Resources**

All operations and transactions decided upon or implemented by the Company and by persons acting in the name and on behalf of the Company must comply with the law, professional integrity, and the principles of transparency, verifiability, consistency, and appropriateness, and must be duly authorized, documented, and recorded.

### **Conflict of Interest**

Situations in which the parties involved may find themselves in a conflict of interest must be avoided.

A conflict of interest occurs when a director, employee, or collaborator pursues an objective that conflicts with that of the Company or obtains, or attempts to obtain, a personal advantage in carrying out activities performed in the Company's interest.

The Company's employees and collaborators, without prejudice to any legal and contractual requirements, must promptly report such situations to their respective superiors.

### **Confidentiality**

The Company upholds the principle of confidentiality of information, data, and news pertaining to business activities and ensures that it is respected and safeguarded by its employees and collaborators, in accordance with the laws in force in the country in which the Company operates.

The Company's directors, employees, and collaborators must maintain the utmost confidentiality, even outside of working hours, in order to safeguard the company's technical, financial, legal, administrative, commercial, and personnel management expertise.

### **Competition**

The Company intends to protect the value of fair competition and therefore refrains from collusive, predatory, or abusive behavior.

### **Respect for the Environment**

The Company considers the environment a primary value and manages its business activities in full compliance with applicable environmental legislation.

### **General Principles of Good Administration**

The Company condemns any behavior aimed at altering the accuracy and truthfulness of the data and information contained in financial statements, reports, or other corporate communications required by law addressed to third parties.

Directors and employees must conduct themselves correctly and transparently in relation to requests made by shareholders, the Board of Statutory Auditors, the Independent Auditor, and other corporate bodies in the exercise of their respective institutional functions.

Any voluntary behavior by directors aimed at harming the integrity of the company's assets or causing damage to creditors is prohibited.

It is prohibited to engage in simulated or fraudulent acts aimed at influencing the will of members of the shareholders' meeting in order to obtain the irregular formation of a majority and/or a resolution different from that which would have been achieved.

The corporate bodies and their members, during audits and inspections by the competent public authorities, must maintain an attitude of maximum availability and cooperation without in any way hindering the functions of the inspection and control bodies.



### **Relations with the Public Administration**

Relations between members of the corporate bodies, employees, and collaborators, on the one hand, and the Italian or foreign Public Administration, on the other, must always be guided by the principles of legality, loyalty, fairness, and transparency.

With respect to representatives, officials, or employees of the Public Administration, the pursuit and establishment of personal relationships of favor, influence, or interference capable of directly or indirectly influencing the outcome of the relationship is prohibited; Offers of goods or other benefits to representatives, officials, or employees of public administrations, even through third parties, are also prohibited, unless they are gifts of modest value and in accordance with custom, and provided that they cannot be interpreted as seeking undue favors.

Any form of gift that even appears to exceed normal commercial or courtesy practices, or in any case intended to obtain favorable treatment in the conduct of any business, is prohibited.

Members of corporate bodies, managers, employees, and collaborators are prohibited from:

- promise or grant money, benefits, or other advantages in order to obtain concessions, licenses, and authorizations from the Public Administration, as well as social security, and/or welfare benefits;
- submit false statements or engage in artifices and deceptions aimed at the undue obtaining of contributions, grants, or financing;
- impede or hinder the exercise of inspection functions by the Public Administration in order to avoid the application of a penalty or to negotiate the amount thereof;
- engage in fraudulent, deceptive, or unfair behavior that could mislead the Public Administration during and following public tender procedures;
- undertake (directly or indirectly) actions aimed at examining or proposing employment and/or commercial opportunities that could benefit representatives, employees, or officials of the Public Administration.
- allocate contributions, concessions or financing obtained from the State or from a public body or from the European Community to purposes other than those for which they were granted.

The Company may not be represented in its relations with the Public Administration by third parties when, based on available information, a conflict of interest may arise.

### **Customer Relations**

The Company bases its business on the principle of quality, understood essentially as the goal of complete customer satisfaction.

In its relationships with customers, the Company ensures fairness and clarity in commercial negotiations and in the assumption of contractual obligations, as well as faithful and diligent contractual fulfillment.

Quotations will be formulated in such a way as to ensure compliance with adequate quality standards, appropriate compensation levels for employees, and current safety measures. The company resorts to litigation only when its legitimate claims are not met with due satisfaction by the other party.

In conducting any negotiations, situations in which the parties involved in the transactions are or may appear to be in a conflict of interest must always be avoided.

### **Relations with Suppliers, Contractors, and Subcontractors**

In selecting and dealing with suppliers, contractors, and subcontractors, the Company evaluates the cost-effectiveness, technical and financial capabilities, and overall reliability of its partners.

Specifically, the Company takes into account factors such as financial strength, project capabilities and resources, know-how, and the adoption of specific corporate quality control systems.



The Company ensures that negotiations and business relationships with suppliers, contractors, and subcontractors are characterized by the utmost fairness and professionalism and are conducted in compliance with applicable regulations. Relations with suppliers, contractors, and subcontractors, including financial and other ancillary contracts, are governed by specific agreements, which are designed to be as clear and understandable as possible and to prevent any abuse of economic dependence.

### **Relations with Employees**

The Company recognizes the importance of human resources as the primary success factor for any business, within a framework of mutual loyalty and trust between employer and employee.

### **Personnel Evaluation and Selection**

Evaluation of personnel to be hired is based on the candidate's profile matching with company needs.

The Company, to the extent of available information, adopts appropriate measures to avoid favoritism, nepotism, or cronyism in the selection and hiring of personnel.

The Company offers equal employment opportunities to all employees based on their specific professional qualifications and performance capabilities, without any discrimination. Personnel are hired under employment contracts in accordance with applicable laws and collective bargaining agreements, as well as social security, tax, and insurance regulations. No irregular or "black" employment is permitted.

Upon establishing an employment relationship, each employee/collaborator receives accurate information regarding:

- Characteristics of the role and duties to be performed;
- Regulatory and remuneration aspects, as regulated by the national collective bargaining agreement and/or the provisions governing the employment relationship;
- Rules and procedures to be adapted to avoid conduct contrary to the law, including this Code of Ethics.

### **Respect in Employee Relations with the Company**

Relationships between company employees/collaborators are based on the values of civil coexistence and are conducted in compliance with the rights and freedoms of individuals and the fundamental principles that affirm equal social dignity without discrimination based on nationality, language, gender, race, religious belief, political or trade union affiliation, or physical or mental condition.

### **Staff Training**

The Company promotes the continuous improvement of its employees' professionalism, including through training initiatives.

The company's human resources are an essential factor for success. For this reason, the company protects and promotes the value of its human resources and ensures an adequate level of professionalism in the performance of the tasks assigned to its employees/collaborators.

To this end, the company provides all employees/collaborators with appropriate information and training tools, encourages participation in professional development and development initiatives, and organizes training courses aimed at maximizing employee satisfaction.

### **Respect for Physical and Moral Integrity**

The Company guarantees the physical and moral integrity of its employees, working conditions that respect individual dignity, and safe and healthy work environments, in full compliance with applicable regulations regarding the prevention of workplace accidents and worker protection.

The Company conducts its business under technical, organizational, and economic conditions that ensure adequate accident prevention and a healthy and safe work environment.



The Company is committed to disseminating and consolidating a culture of safety among all its employees, developing risk awareness, and promoting responsible behavior by all employees.

### **Loyalty**

Employees/collaborators must act loyally, in compliance with the obligations agreed to in the employment contract and the provisions of the Code of Ethics, ensuring high standards of performance.

They must absolutely avoid behavior that could damage the company's image, corporate management, or relationships with stakeholders.

### **Diligence**

Employees/collaborators, within the scope of their roles and responsibilities, are required to act diligently in preserving the company's tangible and intangible assets entrusted to them for the performance of their duties, using them in line with established objectives and operating procedures, sparingly and scrupulously, and reporting any improper use.

### **Protection and Safeguarding of Confidentiality**

Everyone must protect and safeguard the confidentiality of information regarding projects, initiatives, analyses, assessments, and studies, and all information learned in the performance of their work.

Such information must never be used for personal gain, directly or indirectly, or for the benefit of persons outside the company, and any improper and unauthorized use must be avoided.

In particular, employees/collaborators are required to understand and implement the provisions of company policies regarding information security and to guarantee its integrity, confidentiality, and availability.

Requests for information from public authorities or the media must be brought to the attention of Company Management immediately.

### **Personal Data Processing**

The privacy of employees and collaborators is protected by adopting appropriate rules regarding the type of information requested and by using specific methods for processing and storing personal data.

The processing of employees' and collaborators' personal data is permitted only in compliance with applicable legislation and, in any case, by offering them the most comprehensive information and assistance.

Invia commenti

### **Care in the Use of Company Assets**

Carelessness, intentional damage, and improper use of company assets always impede the normal conduct of business, even when there are no criminally punishable circumstances or serious violations of the duty of fairness and loyalty to the company.

The Company reserves the right to prevent improper use of its assets and infrastructure through the implementation of appropriate control systems.

The personal use of company-owned materials or consumables constitutes unlawful conduct and a violation of the principles of this Code.

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

### **Relations with Supervisory Authorities**

In its relations with Supervisory Authorities, the Company is guided by the principles of integrity and professional correctness, avoiding influencing their decisions or requesting preferential treatment through the promise, offer, or grant of compensation or other benefits.

The Company maintains relationships with the aforementioned entities based on full and active cooperation, promptly providing any information requested by them during the investigation and complying with the provisions issued.



To ensure maximum transparency, the Company also undertakes to avoid taking any form of undue advantage from any personal or family relationships with officials of the Authorities.

#### Methods for Implementing and Monitoring Compliance with the Code of Ethics

Any employee or collaborator who becomes aware of violations or attempted violations of this Code of Ethics within the company is required to report them to their immediate superior if committed by other employees or collaborators, or to General Management if committed by their immediate superiors.

The Company ensures the widest possible dissemination of the Code, including externally, providing the necessary interpretative support for its provisions. This ensures that clients, suppliers, contractors, subcontractors, and all other stakeholders, both private and institutional, are fully informed of the values it intends to promote and, in general, of the corporate policy it aspires to.

To ensure compliance with the rules of conduct identified in this Code of Ethics, the Company adopts an appropriate disciplinary system.

All employees, directors, collaborators, and all those who have contractual relationships with the Company are subject to the disciplinary system set forth in this Code.

Any behavior that violates the rules of the Code may have serious consequences and, in the case of employees, may result in the application of disciplinary sanctions, up to and including, in the most serious cases, termination of employment for just cause.

Violation of the Code of Ethics by a manager may justify the revocation of any powers granted to the manager, or, where possible, assignment to a different position, or, in the most serious cases, dismissal.

Violation of the Code of Ethics by suppliers, contractors, subcontractors, external collaborators, or partners may result in termination of the contractual relationship, or the right to withdraw from it.

This express termination clause must be included in all contracts with major suppliers.

Where the Board of Directors determines that the behavior of the Chairman or Directors, including the Delegated Directors, constitutes a violation of the rules of conduct contained in the Code of Ethics, it will take the most appropriate measures, including modifying or revoking such powers and convening a Shareholders' Meeting to potentially adopt, against the aforementioned individuals, the measures referred to in Articles 2383 and 2393 of the Italian Civil Code.

#### Validity of the Code of Ethics

This Code of Ethics is effective from the date of its adoption.

This Code is available to all interested parties through publication on the company website.

Brembate Sopra, on 09/04/2026

Jason Lantzis  
Chairman & CEO

