



TESSITURA DI LURAGO S.R.L.

CODE OF ETHICS

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INTRODUCTION

This Code of Ethics of Tessitura di Lurago S.r.l. is a document that describes the set of values, principles, and rules of conduct that the Company adheres to in conducting its business, performing its activities, and managing relationships with stakeholders. It guides the behavior of all its personnel, corporate bodies, and everyone who has dealings with the Company.

Recipients are required to adapt their behavior to the provisions of the Code of Ethics as soon as it is made available in the most efficient manner possible.

The Company undertakes to ensure the widest possible dissemination of this Code of Ethics and to update it in line with the Company's organizational and commercial developments. To this end, recipients are required to actively contribute to the implementation of the Code of Ethics and to report any problems and/or shortcomings to the Company's management.

GENERAL PRINCIPLES

Tessitura di Lurago S.r.l. continues to invest in Corporate Social Responsibility (CSR) policies, involving all employees to ensure they commit to the highest standards in daily activities and business practices, thereby enabling:

- Compliance with labor laws, human rights, and legal standards, especially those concerning wages and working hours;
- Adherence to international human rights standards, such as the Universal Declaration of Human Rights;
- Maximum transparency in communicating and sharing performance and improvements in social responsibility;
- Promotion of these principles with all individuals and organizations the Company interacts with;
- Cooperation with local entities influenced by the company.

Constant monitoring of our ability to provide serious and satisfactory responses to stakeholders encourages us to operate proactively in line with the values adopted under CSR parameters, which provide a reference framework for achieving the Company's mission.

In this context, the Company's social responsibility management model provides full accountability of employees and collaborators through the application of a precise policy to guarantee transparency and quality in business processes, going beyond mere compliance with legal obligations. This also includes valuing human capital, ensuring safety and professional growth, maintaining an ongoing focus on reducing environmental impact, and boosting competitiveness and performance.

The Company operates with the awareness that socially responsible behavior:

- Helps create and maintain a strong corporate reputation;
- Ensures strong cohesion with stakeholders;
- Creates a better, safer, and more motivating work environment;
- Improves business management efficiency.

The Company's goal is to pursue continuous improvement in the quality of the products/services offered to clients in a highly competitive environment. This is achieved through investments in innovation and technological development, by setting project development goals within shared action programs, while maintaining constant attention to emergency prevention and ensuring timely and effective responses through continuous awareness and training at all levels, especially in matters of health and safety at work and with clients.

RECIPIENTS

Recipients of this Code include the Company's owners, all employees, para-subordinate workers, external collaborators (consultants, business partners, agents, and in general, all those who have dealings with the Company), suppliers, and anyone who, in various capacities and levels, interacts with the Company and/or acts on its behalf.

OUR VALUES

Below is a summary of the values we believe in and adhere to in our daily operations:

INTEGRITY AND COHERENCE

All our business processes comply with applicable mandatory regulations and voluntary requirements across all sectors. The Company is committed to acting honestly, loyally,

and transparently, respecting commitments without exploiting others' disadvantages, and operating in good faith in every activity.

The management serves as a role model for all recipients, demonstrating exemplary behavior in carrying out their duties, constantly promoting a strong sense of integrity, collaboration, trust, mutual respect, and teamwork to safeguard and systematically improve the corporate atmosphere, image, and prestige.

ETHICS AND LEGALITY

The Company considers compliance with laws and regulations, fairness, and transparency in the conduct of business as essential principles. In no case can the pursuit of the Company's interests justify behavior that contradicts these principles of fairness, honesty, and legality.

The Company prioritizes transparency, meaning clarity in all business processes and dynamics. In their activities, employees and collaborators are required to avoid unclear or misleading situations, always showing a transparent attitude, i.e., one that is clear and complete. Requested information must only be provided if relevant and in a simple, clear manner.

False statements regarding the nature, quality, or characteristics of the services and products offered by the Company are considered illegal and contrary to Company policy.

The Company refrains from engaging in collusive behaviors and upholds the value of fair competition and healthy competitiveness. The Company does not choose partners who may appear to have a conflict of interest, that is, those pursuing interests different from the Company's mission or seeking to personally benefit from opportunities in a way that contradicts their fiduciary duties.

The Company promotes active and synergistic collaboration with its suppliers to integrate prevention and protection processes concerning environmental protection, hygiene, health, and safety. It ensures that everyone working on behalf of the organization is informed of the contents of this Code of Ethics.

The Company values confidentiality and refrains from disclosing confidential data and strategic information, even after collaborations end. All stakeholders are informed of the importance of client confidentiality and are therefore not allowed to use any confidential information learned for purposes unrelated to their duties.

The Company deems compliance with current laws essential, committing to avoiding commercial relationships with clients or potential clients known to be involved in illegal activities. In selecting financial and commercial partners, the Company verifies legal requirements by requesting documentation not only for price-quality evaluation but also to check for potential connections to criminal or terrorist organizations.

The ethical principles underlying the Company's business do not allow any operations that could involve even the slightest possibility of engagement in handling, laundering, or using assets or money of illegal origin.

A preliminary risk assessment is aimed at preventing employees and collaborators from exposing themselves or others to danger, remembering that each worker is responsible for their own actions and must comply with the Company's safety policies to ensure a healthy and pleasant work environment.

PROTECTION AND RESPECT FOR INDIVIDUALS

In decisions affecting stakeholder relations (such as client selection, personnel management, and work organization, supplier selection, and relationships with institutions), Tessitura di Lurago S.r.l. condemns any discriminatory behavior based on gender, age, sexual orientation, religious beliefs, nationality, political views, and deems unacceptable any behavior that undermines dignity, both at work and outside work. The Company guarantees and promotes gender equality within the organization and encourages teamwork based on mutual trust, continuous improvement, autonomy, training, flexibility, and cooperation.

The Company rejects and is committed to combating all forms of harassment and behavior that violate personal dignity in the workplace. The Company is committed to creating a safe, peaceful work environment conducive to interpersonal relationships based on equality, fairness, and respect.

ENVIRONMENTAL PROTECTION

The Company is committed to environmental protection, believing in sustainable development, and providing its services in full compliance with national and international environmental regulations. This commitment extends to product and supplier selection,

promoting environmentally responsible choices, and working together with suppliers on projects to build an offer that respects the environment and market needs.

The Company is dedicated to planning its activities to ensure the best possible balance between economic initiatives and environmental protection, respecting the rights of present and future generations, and aiming for sustainable business development.

STANDARDS OF CONDUCT

This section summarizes the principles and contacts the Company refers to when implementing its standards of conduct.

STAKEHOLDERS

Stakeholders, or interested parties, are internal and external entities (individuals, groups, organizations, or institutions) whose interests are directly or indirectly influenced by the Company's activities.

The Company has identified the following stakeholder categories:

- Employees/Collaborators
- Clients
- Suppliers
- Public Administration
- Mass Media, Social Communications, External Relations

The Code of Ethics is published on the website www.tessituradilurago.com and is communicated to stakeholders through appropriate channels.

EMPLOYEES / COLLABORATORS

The conduct of our employees and collaborators must always be based on maximum transparency, fairness, ethical integrity, honesty, and loyalty to the Company. The Company requires employees to refrain from promoting, facilitating, or engaging in any behavior, active or passive, that results or may result in an illegitimate or unlawful

economic or other benefit for themselves or third parties, or that aims to promote or favor illegitimate or unlawful interests for themselves or third parties, to the detriment of the Company.

The Company believes in the principle of equal opportunity, based on skills and personal attitudes, and considers that people are at the center of a company's success. It acknowledges that professionalism, motivation, and commitment are key factors in achieving and maintaining high-quality corporate performance.

The Company promotes the professional growth of its collaborators through appropriate training plans, regularly updated to comply with technical developments and current labor regulations, while applying a meritocratic system in a "comfortable" work environment.

The Company condemns any offensive verbal, physical, or gestural behavior, as well as mobbing.

To ensure a proper understanding of the Code of Ethics for all employees, the Company organizes and implements a training plan aimed at promoting knowledge of the general ethical principles and specific conduct criteria. Training initiatives are tailored based on the roles and duties of the employees.

During employee recruitment, hiring, and career advancement, evaluations are made solely based on objective and transparent merit-based criteria. The Company is committed to providing equal work and career advancement opportunities to all employees, respecting their respective skills and performance.

Sexual harassment, moral harassment, or so-called "mobbing" is not tolerated by the Company, in any form it may manifest. Everyone must show sensitivity and respect towards others and refrain from any behavior considered offensive.

The Company's departments rely on competent collaborators or professionals who work autonomously and responsibly, creating greater satisfaction and better results to share, with a view to continuous improvement. This improvement starts with leveraging the experience gained to capitalize on past work and optimize resources. CLIENTS

For the Company, it is essential that relationships with clients are based on consistency, honesty, professionalism, and transparency.

The Company is committed to providing accurate and comprehensive information about the products offered and always responding to suggestions and complaints. The Company

ensures that its products meet market requirements in terms of material safety and the chemicals used.

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SUPPLIERS

The Company requires its suppliers to commit to complying with this Code of Ethics and, in particular, to adhere to the following fundamental principles:

- Prohibition of illegal child labor;
- Prohibition of slavery in any form;
- Prohibition of any type of work that, by its nature or conditions, might compromise a person's health, safety, or morality;
- Respect for workers' rights to representation and expression;
- Prohibition of discrimination, especially on racial, ethnic, or gender grounds;
- Prohibition of any behavior that constitutes sexual harassment or mobbing;
- Compliance with environmental regulations.

Compensation paid to suppliers must only reflect the services and conditions specified in the contract, and payments must not be made to parties other than those agreed upon in the contract.

PUBLIC ADMINISTRATION

The Company must not be represented in relations with public administration by collaborators and/or third parties who may create any type of conflict of interest.

The Company condemns any illegal behavior carried out on its behalf or in its interest, such as offering or promising, directly or indirectly, money or other benefits to public officials and public service officers, whether Italian or foreign, or to their relatives and family members, with the aim of obtaining any advantage or interest for the Company.

The Company commits to not deny, conceal, or delay any information or communication requested by public supervisory authorities and/or judicial authorities during inspections or investigations and will actively cooperate with any investigation.

Relationships with institutions are reserved exclusively for authorized functions and are based on honesty and transparency in every situation to ensure that behavior reflects commitment and professionalism.

Employees or consultants, who, in performing their functions, interact with Italian or foreign institutions, are required to act in a clear, correct, and transparent manner and must not in any way influence the decisions of public officials or offer money, "favors," or other advantages that could compromise the impartiality of the public official and jeopardize the reputation of the Company.

Collusive behavior, directly or through third parties, that results in personal and/or career advantages for oneself or other parties is strictly prohibited.

During inspections or audits by the relevant authorities, all collaborators and stakeholders must adopt a highly cooperative attitude toward the inspection and control bodies. It is forbidden to provide false or misleading information, grant professional assignments, or give or promise gifts, money, or other advantages to those conducting inspections and audits.

Anyone who directly or indirectly receives requests for benefits from public officials must immediately report the matter to the Company's management.

It is also prohibited to engage in any behavior that might distract a public official from their duties by promising or involving them in leisure activities or relieving them of their tasks by carrying out their activities for them.

MASS MEDIA, SOCIAL COMMUNICATIONS, AND EXTERNAL RELATIONS

The Company's communications to the external environment must be truthful, clear, transparent, and not ambiguous or manipulative. The Company's website and social

media platforms will be developed in compliance with the Code of Ethics, and the Company commits to not publishing defamatory or untrue information.

The Company is administered and managed according to principles of transparency and fairness, fulfilling all civil and fiscal communication obligations to ensure maximum protection of the Company's assets and stakeholders.

The Company ensures the accuracy, transparency, and completeness of the information produced during its activities, as does every collaborator, each for their area of competence and responsibility. All participants in the preparation of data contained in financial statements, corporate reports, and all social communications must diligently verify the accuracy of the information and report any inconsistencies, omissions, or inaccuracies in accounting records or policies to the Company's management.

Every relationship, accounting record, sales report, expense report, invoice, purchase order, or other document of the Company must accurately and clearly represent the relevant facts and the true nature of the transactions.

The Company ensures that all actions and operations are properly recorded and that the decision-making, authorization, and implementation process is verifiable. Collaborators and employees are required to cooperate fully to ensure that each administrative-accounting operation linked to the active or passive cycle has adequate documentary support, certifying the characteristics and reasons for the operation and identifying who authorized, performed, recorded, and verified the operation.

The ethics of the business world, along with the values of loyalty, fairness, and transparency, are often difficult to consistently uphold. Regardless of the competitiveness of the market or the importance of the business, the Company is strongly committed to their application and maintenance.

Corrupt practices, collusive behavior, solicitations for personal or career advantages for oneself or others, directly or through third parties, are prohibited and do not fall within the methods of conducting business.

In relationships with clients, employees are required to:

- Follow internal procedures for client management;
- Provide products/services of high quality that meet clients' reasonable expectations and needs;
- Provide accurate and comprehensive information about the products/services so that clients can make informed decisions;

- Adhere to truthfulness in communications and the principles of fair competition.

Contracts with commercial partners include the obligation to comply with this Code of Ethics and applicable protocols for activities that could expose the company to criminal risk, as well as clauses for contract termination and compensation in case of violations of the principles of legality, fairness, transparency, and confidentiality.

It is forbidden to offer or give payments or material benefits of any amount to third parties, public officials, or private individuals to influence or compensate for an act of their office. Acts of commercial courtesy are allowed if they are of modest value and do not compromise the integrity or reputation of any of the parties and cannot be interpreted as intended to gain improper advantages.

Relations with banks are based on loyalty and fairness, aimed solely at developing the Company's business, including at the international level, in a climate of mutual cooperation and legal compliance.

Current account instruments and corporate credit cards are used only for daily management to achieve the Company's statutory business objectives.

Information and communications released to the media must be truthful, accurate, complete, clear, and respectful of individuals' privacy and confidentiality obligations under the Code of Ethics. In any case, information may only be disclosed following formal authorization by the Company's management.

No direct or indirect contributions are made to political parties, committees, or candidates.

Agents, collaborators, and employees are aware that preserving the integrity of the Company's assets is possible only by respecting internal procedures and regulations, thus ensuring a good reputation through responsible behavior.

It is forbidden to offer money or other benefits to administrators, general managers, executives, or auditors of client companies or any other business partner if this cannot be considered a "gift."

External interlocutors are included in the risk analysis and are equally required to comply with the Code of Ethics.

BUSINESS MANAGEMENT

The following are key principles by which the Company manages its business.

CONFLICT OF INTEREST

Employees are prohibited from working for competitors of the Company or providing, without the Company's written consent, their professional services to third parties as employees or consultants, as well as acting or working on behalf of a supplier or client of the Company. Conflicts of interest may include the following situations:

- Having financial or economic interests in suppliers, major clients, or competitors;
- Using one's position within the Company or the information acquired during normal work activities for personal gain or the benefit of third parties, contrary to the Company's interests;
- Performing work activities of any kind for clients, suppliers, competitors, and/or third parties in conflict with the Company's interests;
- Initiating negotiations and/or contracts – on behalf of the Company – with family members or business partners, or with legal entities in which the employee has an interest;
- Accepting money, gifts, or favors from individuals or entities that are or intend to do business with the Company.

We are committed to identifying potential conflicts of interest, reporting them, and managing them effectively to avoid situations and/or activities where personal interests may conflict with the Company's interests.

GIFTS

In relations with third parties, the Company does not permit the offering or promising of gifts and/or favors, even under unlawful pressure, aimed at obtaining undue advantages or at securing favorable treatment in the conduct of any activity connected to the Company. Likewise, the Company prohibits its employees from accepting gifts and/or favors from third parties to influence their relationships with the Company.

Acts of commercial courtesy are allowed if they are of modest value and do not compromise the integrity or reputation of the Company or influence the judgment of the recipient.

COMPETITION

The Company is committed to competing with its competitors in accordance with ethical principles of fairness and loyalty. The Company will not use illegal means to obtain competitors' trade secrets or other confidential information.

DATA PROCESSING – PRIVACY

The Company is committed to processing personal data in compliance with all privacy laws. This includes the application of the "GDPR" (General Data Protection Regulation).

COMPUTER CRIMES

The Company condemns any unauthorized access to a computer system, the unlawful possession and dissemination of access codes, the interception, or unlawful interruption of computer or telecommunication communications, and the damage to computer systems, information, and data.

Recipients must not unlawfully:

- Enter a protected computer or telecommunication system;
- Acquire, reproduce, or unlawfully distribute access means to computer or telecommunication systems protected by security measures.

IMPLEMENTATION OF THE CODE OF ETHICS

The Company will closely monitor compliance with the Code of Ethics by all recipients, putting in place appropriate information, prevention, and control measures to ensure transparency in operations and behavior, and intervening with corrective actions and appropriate sanctions if necessary.

For any information related to the Code of Ethics and in any situation where there is doubt about the most appropriate course of action, or to report a violation of the Code, recipients of the Company may contact the Company's management via email.

The Company guarantees confidentiality and privacy regarding the identity of those reporting violations and does not tolerate any form of retaliation against those who, in good faith, report possible violations of the Code of Ethics or seek clarification on its application.

Violation of the principles in this Code of Ethics undermines the trust established with the Company and may result in disciplinary and legal actions.

Compliance with the rules of the Code of Ethics is an essential part of the contractual obligations of the recipients with the Company.

For non-employee recipients, adherence to the Code of Ethics is a prerequisite for continuing the professional or collaborative relationship with the Company; therefore, violating the rules of the Code of Ethics may constitute a breach of contractual obligations, with all the legal consequences that follow.