



Centro Accessori SpA Benefit Company

Code of Ethics

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The Code of Ethics of CENTRO ACCESSORI SpA Società Benefit Company has the purpose of defining and formalising the general values of an ethical nature and the principles of conduct to which the company has intended and intends to constantly inspire its activity.

The formalisation of ethical values constitutes the basic element of the corporate culture, as well as the standard of conduct of anyone operating in the interest or to the advantage of the Company itself in the conduct of its activities and business.

The primary objective of this Code of Ethics is to make uniform, compliant and known the values, principles and behaviour in which CENTRO ACCESSORI SpA Società Benefit recognises itself in order to best meet the needs and expectations of the Company's interlocutors. It promotes a high level of professionalism and forbids those behaviours that are in contrast not only with the regulatory provisions relevant from time to time, but also with the values that the Company intends to promote.

The ethical-social principles and responsibilities are taken for granted and shared by all participants in the work activity: employees, collaborators, consultants and all company stakeholders, including customers and suppliers. Their individual and collective behaviour must therefore be in tune with the company's policies and must concretely translate into cooperation, social responsibility and respect for regulations by following the standards of conduct identified in the Code of Ethics.

The principles of the Code of Ethics constitute specifications of the general obligations of diligence, fairness and loyalty that must qualify the performance of work services and behaviour in the working environment referred to Centro Accessori SpA Società Benefit.

The principles and rules of conduct of the Code of Ethics are binding rules and principles, in the performance of company activities, for both internal and external stakeholders.

In particular, the Code of Ethics is addressed to all those who establish relationships or relations with the Company, whether direct or indirect, on a stable or temporary basis, or who in any case work to pursue the Company's objectives; they will be hereinafter referred to as 'Addressees'.

Recipients who violate the principles and rules contained in this Code, damage the relationship of trust established with the Company.

1. General Ethical Principles

The company's **MISSION** is *"to contribute to making the fashion business sustainable, by offering products and services that favour respect for the environment and for people"*.

In order to achieve this mission, we intend to make use of principles that we consider to be fundamental values of the company's actions:

Enthusiasm: enthusiasm is passion and curiosity, it is a value that generates the drive to act towards change with a positive impact.

Responsibility: one's action must be aware of one's role and the impact it will have on the activities of colleagues, customers, suppliers and in achieving a common end result.

Respect: it means acting in full respect of the fundamental rights of each individual, protecting their moral integrity and ensuring equal opportunities.

Competence: it means acting with the full capacity to orient ourselves in our sector, thanks to a savoir-faire that has become savoir-à-be, towards the customers for whom we are partners in projects to be realised together, and towards the suppliers with most of whom we have more than ten years of healthy relations.

Confidentiality: this is how we handle all the information we learn in the course of our work and information relating to personal data, guaranteeing the utmost confidentiality by fully complying with current legislation in terms of privacy and GDPR.

2. Relations with employees and collaborators

Respecting the principles set out in the Code is a moral duty of all Recipients, who are required to be fully aware of the fact that this is functional to the pursuit of corporate objectives according to the fundamental values indicated.

Compliance with the rules contained in the Code of Ethics represents a fundamental element for the proper functioning of the company.

2.1 PROHIBITION OF DISCRIMINATION

The Recipients ensure respect for the person, recognizing the value of life, health and human dignity.

In both internal and external relations, behavior with discriminatory content based on political or trade union opinions, religion, race, nationality, age, sex and sexual orientation, state of health or any other intimate characteristic of the person in general is not permitted.

Furthermore, the following are prohibited: child labor and forced or compulsory labor.

2.2 CHILD LABOUR

There are no underage workers in the company.

It recognises the importance of work as a way of personal and professional development and, in compliance with the relevant regulations, offers the possibility of internships within its services.

2.3 FORCED LABOUR

The work carried out by all personnel employed at Centro Accessori SpA Società Benefit is absolutely voluntary, no one is the victim of threats or other intimidation forcing them in any way to work for the company.

Human trafficking, the recruitment, transfer, accommodation or reception of persons through the use of threats, force, deception, or other forms of coercion, for the purpose of exploitation, is prohibited.

2.4 ANTI-CORRUPTION PRACTICES

The rejection of corruption in the management of one's own business, in whatever form it takes place (both in relations with public and private entities), is at the basis of the choices that guide the Company's activities.

Employees may send anti-corruption reports also in anonymous form by using the 'Suggestions and reports' box.

The Company invites employees, managers and members of corporate bodies to report any suspicion of fraud, unlawful or irregular conduct and/or any type of serious danger or risk that may involve or in any case damage employees, consultants, customers, suppliers, stakeholders, the public or the company's reputation itself, and of which they may have become aware during their work and management activities.

2.4.1 GIFTS, GRATUITIES, BENEFITS

It is expressly forbidden to distribute free gifts and presents outside the scope of company practice (i.e. any form of gift offered in excess of normal business practices or courtesy, or in any case aimed at acquiring favourable treatment in the conduct of any company activity).

In particular, any form of gift to Italian and foreign public officials (even in those countries where the giving of gifts is a widespread practice), or to their family members, that may influence their independence of judgement or induce them to secure any advantage for the company is prohibited.

Permitted gifts are always characterised by the smallness of their value.

Directors, senior management and employees are allowed to accept gifts or other forms of gratuity from third parties who have or could potentially have relations with the Company, within the limits of normal courtesy relations and only if modest, courtesy and only if of modest value. It is forbidden to accept gifts in the form of money or goods easily convertible into money.

In the event of receiving a gift that does not meet the above criteria, it must be refused.

2.5 REPORTING SYSTEM

Furthermore, the Company invites employees, managers and members of corporate bodies to report any suspicion of fraud, unlawful or irregular conduct and/or any type of serious danger or risk that may involve or in any case damage employees, consultants, customers, suppliers, stakeholders, the public or the company's reputation itself, (including safety in the workplace) and of which they may have become aware during their work and management activities.

Each circumstantiated report made within the company shall be given adequate consideration, while ensuring confidentiality as to the identity of the reporter;

- a circumstantiated and bona fide whistleblowing shall not have any adverse effect on the whistleblower in connection with its submission;
- the person making a substantiated and reasonable report in good faith shall be protected against retaliation or other action by the persons involved in the facts that are the subject of the report.

2.6 ENVIRONMENTAL PROTECTION

Environmental protection is considered by Centro Accessori SpA Società Benefit as a fundamental value in the company's operations, from the management of daily activities to strategic choices. Energy saving", "waste management", the correct re-use of recyclable materials, attention to discharges and emissions form the subject of information and training also in order to make profitable use of the resources made available by the company for these purposes. The company takes care of the dissemination and consolidation of a culture of environmental protection by developing risk awareness and promoting responsible behaviour by all personnel.

All Addressees, within the scope of their duties, participate in the process of preventing environmental risks and are obliged to promptly report any infringement or risk to the environment to the competent function managers and corporate bodies.

3. Criteria of conduct

3.1 Criteria of conduct in relations with employees

In compliance with current national and international regulations, the company upholds the importance of work as a way of personal, as well as professional, growth and development and seeks to bring its employees closer to the corporate world by offering contracts that favour the acquisition of specific technical skills and full integration in the world of work.

Centro Accessori SpA Società Benefit promotes a serene working climate within the company, in which everyone can work in compliance with the law, principles and shared values. shared values; in particular, no form of exploitation, harassment for any reason of discrimination, for personal or work reasons, is tolerated.

3.1.1 PERSONNEL SELECTION

Recipients promote respect for the principles of equality and equal opportunities in personnel selection activities.

In selecting the profiles of their collaborators, particular importance is attached to skills and competences such as:

- the ability to autonomously manage one's own task to achieve a common objective;
- the aptitude for problem solving and the propensity to critical thinking that make it possible to constantly improve results;
- the ability to relate and work as a team in the search for improving solutions and the achievement of success for the entire company;
- the wealth of skills and experience gained during the training course and during previous working relationships.

The Recipients shall favour the utmost cooperation and transparency towards the newly hired employee, so that the latter is clearly aware of the task assigned to him/her. Staff are hired with a regular employment contract in full compliance with the law.

3.1.2 HEALTH AND SAFETY

The company CENTRO ACCESSORI SpA Società Benefit, recognises health and safety in the workplace as a fundamental right of its employees and for this reason, it takes care of the diffusion and consolidation of a culture of safety and health of workers in the workplace, promoting with continuous training the prevention and awareness of risks and responsible behaviour by all personnel.

The company, referring to the regulatory requirements in force at a national level (Legislative Decree No. 81/08 and subsequent amendments), strives to guarantee a work environment that allows workers to feel safe from possible dangerous situations, and that the place where they carry out their work reflects the health and hygiene conditions of the laws in force on the subject.

The company CENTRO ACCESSORI SpA Società Benefit provides valid methodologies to identify, avoid and deal with potential risks and takes care to elaborate and manage specific measures for the reduction and prevention of accidents and serious damage to workers' health. In order to prevent accidents, various figures have been identified to control and manage health and safety criteria, protecting the needs of workers.

3.1.3 WORKING HOURS

CENTRO ACCESSORI SpA Benefit Company guarantees that working hours and the regulation of holidays and overtime are in compliance with current laws. The company's working hours are defined and displayed on the company noticeboard.

3.1.4 FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

The company CENTRO ACCESSORI SpA Società Benefit respects the right of all staff to join the unions of their choice and the right to collective bargaining, highlighting this through specific written communication, without there being any type of negative repercussion on the workers to prevent and eliminate cases of discrimination in the workplace.

3.2 Criteria for conduct with customers and suppliers

3.2.1 Criteria of conduct towards customers

Customer relations must be based on loyalty, legality and transparency, as well as characterised by courtesy and professionalism, both to consolidate the relationship of trust with customers and to promote the image and reputation of CENTRO ACCESSORI SpA Società Benefit among the public.

The Addressees act by guaranteeing professionalism and quality of work, ensuring its continuous improvement in order to offer customers satisfactory answers and favour their conscious choices, with a view to making them an integral part of the value chain and of their own ethical chain.

3.2.2 Criteria of conduct towards suppliers

Without prejudice to the application of the general rules set out in this Code of Ethics, the choice of suppliers and external consultants is inspired by criteria of competence, cost-effectiveness, transparency and fairness.

In any case, the Company gives preference to reliable suppliers, assessing them on the basis of the reference documentation and corporate quality systems.

All remuneration and/or sums paid for any reason for supplies or professional appointments must be adequately documented, proportionate to the activity performed and in line with market conditions, in accordance with the procedures established by the Company.

All suppliers are required to:

- comply with labour laws and regulations and adopt all appropriate measures to contribute to the respect of the Planet and pursue sustainable innovation;
- not to discriminate against their staff on the basis of race, nationality, sex or religion;
- not resorting, in the performance of its activities, to the exploitation of child labour or non-consenting prisoners (forced labour);
- to read the Code of Ethics and to commit to its observance.

CENTRO ACCESSORI SpA Società Benefit will not establish business relations with suppliers who do not undertake to comply with the principles established in this Code of Ethics, preparing adequate contractual clauses specifying this requirement for this purpose.

4. Sanctioning System

Compliance with the rules of the Code of Ethics must be considered an essential part of the contractual obligations of all Addressees. The rules contained in the Code of Ethics, in particular, integrate the behaviour that the employee is required to observe, by virtue of the civil and criminal laws in force and the obligations provided for by collective bargaining. Violation of the Code's rules damages the relationship of trust established with the Company and, insofar as it is assessed as a breach of the mutual contractual obligations of the employment relationship or professional collaboration, pursuant to Article 2104 of the Civil Code.

Conduct by employees and external parties that is contrary to the principles set out in this Code of Ethics may constitute grounds for sanctions, up to and including termination of the relationship with the perpetrator in the event of serious breach.

5. Tools

The Human Resources function is responsible for carrying out checks on the application and compliance with the Code of Ethics. In order to make the Code of Ethics effectively operational, the sanctioning system coincides with that established within the scope of the Collective Agreements at national level and applicable to the Company's employees.

April 3, 2023

The direction

For RLS notification
