

CODE OF ETHICS AND CONDUCT

of

MAPEL COMPONENTS s.r.l.

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and

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FOREWORD

Company History, Mission and Philosophy

The company MAPEL was founded in 1989, almost by fun, by a group of professionals, to offer a range of services to many artisan leather craftsmen in the Varese area. To supply articles ready for mounting and covering on bags and suitcases.

First by word of mouth, then also through trade fairs and today through internet and social networks MAPEL continues to grow. Acquiring new clients on a daily basis (now over 800 active clients) MAPEL have also developed a large product catalogue (over 5000 SKU's across standard and custom articles).

New technologies and materials are the basis of MAPEL's ability to keep pace with the times and to supply to the most important Brands in the world, with articles of the highest quality, superior workmanship and industrial volume production.

Over the last 30 years the satisfaction of our customers speaks for us. We have always been able to offer, with the most appropriate materials, handles and reliefs, laser cut steel slats, webbings (tubular, elastic and padded), and much more, all produced in Italy, by an Italian team, a wholly «Made in Italy» product.

MAPEL today is known by all in the clothing, Leather-goods and footwear sectors. Its products are distributed worldwide and are proud to be a "go to" supplier for the most prestigious "modellerie" of those working in Fashion. A young, dynamic and proactive company with a wealth of experience and techniques, always ready to face new challenges and to offer the best solution to every problem. .

...

MAPEL is composed of two companies, completely independent of each other but with the same values and objectives:

- **MAPEL components s.r.l.**, making handles and profiles in cork, rubber and salpa, steel slats, plastic and metal reinforcements;
- **MAPEL textile s.r.l.**, created in 2006 to meet the demand in the market for webbings, padded straps, elastic and labels (all highly customisable);

*hereafter, jointly named «**Gruppo Mapel**», a group of people, ideas and experiences as it is through the DNA of all constituent components that the group is able to outperform the sum of its individuals!*

...

*The strength of the **Gruppo Mapel** lies in its focus on success, a reason for pride and trust for:*

- *clients, so that they receive, through close support, quality products that meet their expectations;*
- *employees, who work in the company, who can utilise and display our strength through their competence and spirit;*
- *the region, to improve social and environmental wealth and to aim to prosper in view of a sustainable future;*
- *suppliers, so they may be key players in our success and faithful partners in our development.*

CHAPTER I – GENERAL PROVISIONS

1. SCOPE OF APPLICATION AND ADDRESSEES

Gruppo Mapel adopts all actions, operations, relationships and transactions necessary for its various social activities, inspired by the ethical principles and rules contained in this Code of Ethics.

The purpose of this Code of Ethics is to extend the provisions already contained in the code of conduct for workers to all those who, within the companies of the Group, hold positions of representation, management or administration (or who, in any case, exercise control over employees or collaborators, such as consultants, suppliers, agents, representatives, intermediaries etc.) and anyone who similarly has business relations with the Group *hereinafter referred to as the “Recipients”).

The provisions of the Code of Ethics, addressed to the above mentioned persons, must be known and disseminated to all employees of the Companies of the Group, who are required to make an active contribution to ensuring compliance. To this end, the **Gruppo Mapel** will ensure the widest possible dissemination of this Code of Ethics, using the various channels of knowledge and training available to it, in order to make the Recipients aware of all its principles.

2. EMPLOYEE OBLIGATIONS

Employees are required to comply with the Code of Ethics during the performance of all their activities.

Specifically, all employees are required to:

- communicate to the Supervisory Body (described in chapter V paragraph 9) any information relating to alleged violations of this code of ethics which have emerged in the context of the company;
- guarantee the widest collaboration in the verification of possible and / or hypothetical violations of this Code of Ethics;
- communicate the provisions of this Code of Ethics to third parties with whom they have business relations.

Collaboration, honesty and mutual respect are the “Pillars” of the relationships that exist between employees at all levels and third parties with whom they come into contact, by virtue of the work activities assigned to them.

CHAPTER II – ETHICAL PRINCIPLES

3. GROUP ETHICAL PRINCIPLES

The **Gruppo Mapel** approves of, accepts and complies with the following ethical principles:

❖ **BUSINESS ETHICS AND INTEGRITY**

- Loyalty, transparency and respect for the law
- Clarity, fairness and consistency in relationships
- Competence and responsibility
- Protection of “Privacy” and confidentiality
- Protection of intellectual and industrial property
- Conflicts of interest
- Anti corruption
- Anti money laundering
- Support to the region and to «Made in Italy»

❖ **HUMAN RIGHTS, DIGNITY AND FUNDAMENTAL FREEDOMS**

- Valuing human resources
- Fair working hours
- Fair salaries and benefits
- Discrimination
- Avoiding child labour
- Avoiding forced and compulsory labour
- Avoiding illegal clandestine and undeclared work
- Avoiding harassment and abuse
- Freedom of association
- Health and safety in the workplace

❖ **RESPECTING THE ENVIRONMENT**

- Environmental protection
- Respect for natural resources and efficiency in the use of materials and resources
- Preservation of biodiversity
- Responsible use of water
- Optimising waste use and reducing waste
- Mitigating and slowing climate change
- Respect for animals

❖ **PRODUCT RESPONSIBILITY**

- Sustainable production development
- Chemical safety of articles
- Traceability in the production chain

herin described in detail:

3.A. BUSINESS ETHICS AND INTEGRITY

3.A.1. LOYALTY, TRANSPARANCY AND RESPECT FOR THE LAW

Gruppo Mapel believes that legality, fairness, honesty, equity and impartiality of conduct, both inside and outside the company, constitute a common way of feeling and acting.

In sharing these principles, it therefore asks the Recipients of this Code to adopt the strictest compliance with the regulations in the countries in which it operates.

The various social activities and all consequent choices must therefore see the Recipients operate with the utmost neutrality and objectivity, in the best interest of the Group, taking charge of each decision with professionalism and objectivity.

It is essential that Recipients commit themselves loyally and effectively, in order to achieve the company's objectives with awareness of their tasks and responsibilities

3.A.2. CLARITY, FAIRNESS AND CONSISTENCY IN RELATIONSHIPS

Gruppo Mapel is committed to providing all its stakeholders with clear, complete and timely information on the actions taken at all levels of the Company.

Every action, operation, negotiation and, more generally, conduct, must be oriented towards maximum correctness and reliability.

In the management of their duties, Addressees are required to always provide clear, truthful, complete and accurate information. They are also required to be extremely consistent.

For everyone, being consistent means committing themselves to implement daily, in every action, the mission, values and operating principles of the company. They are considered the foundation for strategic planning, objectives and operational management.

3.A.3. COMPETENCE AND RESPONSIBILITY

Gruppo Mapel values competence as an indispensable element for its success and expansion in national and international markets. The development of its activities is based on criteria of skill, commitment, experience and meticulousness, appropriate to the nature of the tasks and responsibilities of each individual.

Gruppo Mapel aims to introduce at different organizational levels all aspects of that "possible" innovation, where technology, planning, management and process and product control can significantly affect results.

Gruppo Mapel intends to act, day by day, for the maintenance and improvement of its activities. It is the Group's will to support and promote the attitude to change, involving skills and encouraging cooperation and the exchange of knowledge.

Gruppo Mapel is convinced that it is only through a culture of dialogue that information is disseminated and greater competence is automatically acquired.

Gruppo Mapel interprets the company as the place of responsibility, where responsibility must grow with skills and discretion in its choices.

Consequently, the dissemination and implementation of this Code depends on the commitment of everyone, especially those who have the greatest influence and are required to behave in a way that is recognizable as a "value of example".

However, responsibility also means giving an account of one's own objectives and activities to one's stakeholders through the visibility of shared objective results.

3.A.4. PROTECTION OF PRIVACY AND CONFIDENTIALITY

Gruppo Mapel considers confidentiality to be an essential rule of conduct, always ensuring the utmost discretion of information, in the strictest compliance with current legislation on the protection of personal data ("G.D.P.R.", "Privacy" law, etc.).

For this reason, the Recipients, to whom this document applies, must be able to distinguish and refrain from using confidential information relating to **Gruppo Mapel** or its third parties, of which they may have become aware, by reason of their work duties, for personal purposes and in any case not connected with the performance of the activities entrusted to them.

This provision is also to be considered extended to every employee or collaborator (including external collaborators), so that no one may benefit directly or indirectly, personally or financially, from the use of information that has not yet been made public or which, due to its nature, may be considered confidential. Information must be communicated to third parties only by authorised persons and in any case in compliance with company regulations.

The communication of information to third parties, which is permitted only for official or professional reasons, must always be accompanied by a declaration of the confidential nature of the information, requiring the third party to comply with the obligation of confidentiality.

In addition, password-protected electronic information must only be known by the assignees, who are obliged to guard it with the utmost diligence.

3.A.5. PROTECTION OF INTELLECTUAL AND INDUSTRIAL PROPERTY

Gruppo Mapel supports intellectual and industrial property, at every point of its formation, and fully recognizes it to each of its legitimate owners.

The Recipients must act in full compliance with this directive, in accordance with and in compliance with any law, regulation or convention protecting such rights.

For these reasons, Recipients, aware that any information, such as, by way of example but not limited to, technical specification, drawings, projects, sketches, etc., may constitute know-how and potentially intellectual or industrial property, are required to:

- a) use such information only for the purpose of manufacturing the relevant products;
- b) preserve any confidential content from unauthorized parties;
- c) keep the data as strictly confidential, implementing and responding to all measures taken for this, so that all authorized persons do not spread this data in any way;
- d) to immediately stop the use of the information of know-how possessed, at the end of the assignment or at the termination of the same.

All this is to respect competition, a market situation with ample freedom of access to business activity, the possibility of free choice for purchasers (especially consumers) and, in general, the possibility for everyone to seize the best opportunities available on the market, or propose new opportunities, without impositions or constraints imposed by coalitions of any kind.

The protection of competition is achieved by means of a series of rules, generically defined as antitrust rules, which regulate the relations between entrepreneurs and allow for the regular conduct of competitive relations: within the framework of these rules, the **Gruppo Mapel** refrains from adopting unfair competition policies.

3.A.6. CONFLICTS OF INTEREST

Gruppo Mapel works to avoid situations that could give rise to conflicts of interest with any Person (even potential conflicts), following rules of fairness and impartiality, which do not encourage illegitimate interests, collusive practices or choices that bring inappropriate advantages.

Being in conflict and actually abusing one's position is not necessarily a direct consequence: a person involved may never act improperly, but a conflict of interest exists whether or not it is followed by improper conduct, and is therefore generally prohibited or discouraged by specific rules. The existence of a conflict of interest is not, in itself, evidence of wrongdoing, but it is an unfair advantage if you seek to benefit from it.

In order to keep these situations under control, the Recipients (whether internal or external to **Gruppo Mapel**) must monitor the links established with the supplier, tracing and highlighting any existing relations between the Recipients and their possible conflicts, such as family ties. In these conditions, the Recipients will comply with the decisions taken in this regard by **Gruppo Mapel**.

3.A.7. ANTI CORRUPTION

Anyone who represents or acts in the interest of **Gruppo Mapel**, or has business dealings with it, must refrain from any form of corruption.

Therefore, no payment or concession of advantages towards anyone (customers, commercial counterparties and third parties) is permitted, except those arising from a transparent working relationship governed by a contract or a negotiated obligation.

The Recipients of this document (Customers, Suppliers and other partners) must also ensure that their employees and collaborators act in compliance with the regulations in force, and share this principle.

Employees and collaborators of Recipients identified by **Gruppo Mapel** may accept or offer gifts, provided they are lawful and offered in a transparent and explicit manner, of modest value, occasional or exchanged in connection with holidays or justified events, but only if they are directly connected to the activity carried out, and do not create an obligation or a feeling of obligation on either side.

3.A.8. ANTI MONEY LAUNDERING

Gruppo Mapel makes every effort to ensure that its business operations are transparent to all parties, in full compliance with national and international regulations on combating money laundering.

Money laundering is the set of operations aimed at giving a legal appearance to capital whose origin is actually illegal, thus making it more difficult to identify and recover.

In rejecting any conduct aimed at using, replacing, transferring or concealing sums of money of known or presumed illegal origin, **Gruppo Mapel** undertakes to verify the reliability and reputation of its business partners, strictly complying with anti-money laundering regulations.

The Recipients, each for their relationship established with **Gruppo Mapel**, undertake to combat activities that can be linked to the laundering of money originating from criminal activities, receiving stolen goods, of illicit origin, etc.

3.A.9. SUPPORT TO THE REGION AND TO «MADE IN ITALY»

“Made in Italy” has always been represented by the elegance and craftsmanship of an all-Italian “know how” brand, a heritage that embodies the present, past and future of Italy. For this reason, **Gruppo Mapel** intends to promote the enhancement of the manufacturing traditions of the territory, the excellence of the family business with attention to the quality of products and processes: a mix to be preserved and passed on to future generations, as the key to the success of its economy.

A way of doing business through an organisation of production that still shows many strengths and that proves to be efficient where, in changes of strategy, the region asserts itself as the laboratory of an always innovative company, able to adapt to the changes of the market, but also to support innovation. All this constitutes an Italian excellence whose know-how must be preserved and nurtured over time.

The Recipients of this document are therefore required to combat counterfeiting and ensure the legitimate labelling of origin on products, as actions in a market where the words “customisation”, “uniqueness” and “authenticity”, but above all “handmade” are increasingly gaining a prominent place in the vocabulary of sectors such as fashion, clothing, footwear, etc..

Gruppo Mapel encourages its Recipients to be inspired by a spirit of collaboration, fairness and transparency, encouraging the growth of employment in the areas where it operates, in order to carry its flag throughout the world.

3.B. HUMAN RIGHTS, DIGNITY AND FUNDAMENTAL FREEDOMS

3.B.1. VALUING HUMAN RESOURCES

The **Gruppo Mapel** guarantees a working environment in which each person can feel that he or she is the protagonist of his or her own professional attitude. In this context, it moves to support skills, potential and commitment, using a variety of shared, clear and homogeneous criteria for their evaluation. The management of human resources is aimed at improving and enhancing the skills of the individual and the collective, through specific training and periodic updating of all its members.

Human, professional and corporate growth is a primary objective to be pursued.

Differentiation with respect to merit characterises the process of recognition and growth of workers. In the structure of the group all the activities that can help to carry out the respective tasks are guaranteed, with respect to the diversity of each one.

Meritocracy is developed in the **Gruppo Mapel** with respect to one's IQ, aptitude for work and the effort made to perform one's tasks correctly.

The **Gruppo Mapel**, starting with its managers, promotes a working environment based on information and involvement of personnel.

In particular, it:

- clearly defines company roles;
- solicits the contribution of all professional figures to the solution of problems, with particular regard to those who work in contact with customers;
- organises periodic meetings to share company objectives;
- develops appropriate means of communication with all interested parties;
- initiates periodic surveys on the company climate and strives to constantly improve it;
- employs specific management systems.

Everyone aims to make the most of his or her working time, requesting only services that are consistent with the performance of duties and with the company's needs. Similarly, everyone has the duty to pursue, within the scope of their activities, the maximum efficiency of the organization.

In this mission, **Gruppo Mapel** selects business areas and development plans, in order to increase its value and be more and more competitive in the market.

3.B.2. FAIR WORKING HOURS

Working hours must always comply with the laws in force in the countries where **Gruppo Mapel** and its Recipients operate, including breaks, rest days, vacations and leave of absence.

In particular, Recipients are required to guarantee their employees maximum working hours (and overtime) in line with the relevant ILO (International Labour Organization) Conventions. Overtime should be voluntary and should not exceed 12 hours per week. Staff must be given at least one day off after six consecutive days of work, unless laws and collective bargaining agreements provide for flexible working hours with the possibility of adequate compensatory rest.

3.B.3. FAIR SALARIES AND BENEFITS

The remuneration system of **Gruppo Mapel** and its Recipients must always respect a salary that guarantees full compliance with all applicable laws and regulations, as well as with the collective agreements adopted.

The remuneration of each employee and collaborator must be fair and sufficient to meet basic needs and standards of living that respect the dignity of the individual (considering separately and independently possible rewards and direct and indirect benefits, not only economic, offered to the employee in exchange for his or her contribution to the organization).

3.B.4. DISCRIMINATION

The **Gruppo Mapel** upholds and recognizes the principles of dignity and equality, without any discrimination based on age, gender, sexual orientation, personal and social conditions, race, language, nationality, political and trade union opinions, religious beliefs, physical and mental disabilities, or any other personal characteristic not related to employment. It follows, therefore, that no discriminatory behaviour is tolerated.

Collaboration, respect and fairness constitute the normal working climate of the **Gruppo Mapel** and are required of all its Recipients: it follows that any activity aimed at fostering and ensuring a culture of "non-discrimination" in the workplace is to be encouraged, with particular attention to the management and training of human resources.

3.B.5. AVOIDING CHILD LABOUR

The **Gruppo Mapel** is against the employment of workers younger than the minimum age required by the law of the country in which it operates, and requires its Recipients to do the same (in each of its locations), and not to assign underage workers to night work or tasks that are dangerous, unhealthy or incompatible with educational obligations.

Gruppo Mapel is convinced that proper and harmonious physical, mental and emotional development is an inviolable right of the child: the denial of this right constitutes exploitation.

3.B.6. AVOIDING FORCED AND COMPULSORY LABOUR

Gruppo Mapel does not use or support the use of forced or compulsory labour as a source of income, nor does it tolerate human trafficking. In this context, the Group and its Recipients are required to be transparent with their employees with regard to all aspects of the management of the employment relationship, and in particular to:

- comply with the Workers' Charter;
- request a copy of the employee's identity document, and not the original, for all the paperwork that will be necessary, in order not to restrict the freedom of movement of employees;
- refrain from requesting before or during employment "deposits" of money, which could represent a limitation on the employee's freedom of movement;
- Specify the role and duties of the employee in the relevant employment contract;
- provide evidence of the voluntary nature of the employment, through the presence of the signed individual contract;
- organize meetings and/or deliver information on the rules of the employment relationship being applied, responding to any needs or clarifications;

to uphold the principle that employment is freely chosen.

3.B.7. AVOIDING ILLEGAL CLANDESTINE AND UNDECLARED WORK

Illegal or undeclared work is an employment relationship in which an employer uses the professional and/or work services of a person without providing him or her with any social security, guarantees or protection provided for by law, and without paying the required taxes, due to the absence of an official employment contract.

Gruppo Mapel condemns irregular employment (illegal, clandestine, undeclared, etc.) and requires that all Recipients provide their employees and collaborators with employment contracts in written, understandable and legally binding form. Recipients who are obliged to register such contracts, keeping the relative information, with the exception of the type of contract, working hours and remuneration, guaranteeing access to authorised personnel only.

Recipients who are obliged to comply with the applicable regulations, without circumventing any of the rules contained therein, such as the employment of labour with a valid residence permit or the adoption of adequate social security, welfare and insurance provisions, in compliance with the applicable laws and regulations, as well as the collective agreements adopted.

3.B.8. AVOIDING HARASSMENT AND ABUSE

Gruppo Mapel, in affirming its respect for Human Rights, is committed to ensuring a workplace where dignity and respect exist, without any form of imposition, oppression, mistreatment, harassment or abuse.

Each employee's superior will never use his or her position to ask personal favours of his or her collaborators, nor will he or she demand any behaviour that is not provided for in work contracts and in the rules of this Code. The company will also protect its employees and collaborators from sexual harassment, acts of psychological violence and any discriminatory or personally harmful attitude.

Recipients are obliged to comply with these principles and treat all their staff (whether employees or collaborators) with fairness, respect and dignity, refraining from subjecting them to abuse of any kind (physical or psychological threats) in accordance with applicable regulations.

Financial or disciplinary sanctions unlawfully designed to implement or conceal any form of harassment and abuse are also prohibited.

3.B.9. FREEDOM OF ASSOCIATION

Gruppo Mapel promotes freedom of association (as provided for in Article 18 of our Constitution) and collective bargaining, as the basis for workers' participation and the protection of their rights. Recipients are expected to respect the rights of workers to join trade unions in a legal and peaceful manner, or to negotiate collective agreements, without discrimination, interference of any kind or repercussions, in accordance with applicable laws and regulations.

Freedom of association enables a cycle of dignified work that increases productivity, income and profits for all concerned. Ensuring respect for the right to representation by giving workers a voice facilitates local responses to the challenges of the global economy and is the basis for sustainable growth and attracting secure investment.

3.B.10. HEALTH AND SAFETY IN THE WORKPLACE

Gruppo Mapel cares about the health and safety of its workers, respecting their individual dignity, and is committed to providing and maintaining safe and healthy working environments, in compliance with the accident prevention laws in force in the countries where it operates.

In order to do so, great attention is paid to all the risks inherent in the work activities carried out, so that each person, to the extent of his or her competence, adopts responsible conduct that respects the safety system provided for and the company procedures...

...and in this way to foster a culture of safety awareness.

In addition, everyone is called upon to contribute actively and personally to maintaining the safety and quality of the working environment in which he or she works.

Gruppo Mapel is therefore committed to:

- carrying out safe activities in order to protect the health of its employees and the community around it;
- constantly monitoring the efficiency of the system, in order to protect against safety-related risks, with the aim of constantly improving it.

Gruppo Mapel is committed to spreading and consolidating a culture of safety among its employees and collaborators, developing risk awareness and promoting responsible behaviour.

To this end, it undertakes to

- adopt occupational health and safety management systems;
- define specific objectives and improvement programs aimed at minimizing accidents and occupational illness;
- report on occupational health and safety in the performance of its activities.

3.C. RESPECTING THE ENVIRONMENT

3.C.1. ENVIRONMENTAL PROTECTION

Gruppo Mapel conducts its activities with a view to protecting the environment through the continuous improvement of its performance with regard to the environmental impact of its activities.

To this end, it is committed to:

- adopting certified environmental management systems and working to prevent environmental risks;
- defining specific environmental objectives and improvement programs aimed at minimizing significant environmental impacts;
- spreading the culture of respect for the environment throughout the region, also through dedicated initiatives and specific customer services;
- provide institutions with all the information they need to understand any environmental risks linked to the company's activities;
- promote environmental awareness and training activities within the company and promote the spread of eco-efficient technologies;
- report on the environmental impact of its activities through the identification of key performance indicators.

The consideration of the environment is not only to comply with regulations, but also to structure growth in a sustainable way, maintaining competitiveness in the global market.

To reinforce these intentions, the **Gruppo Mapel** has embarked on the road to comply with Greenpeace's Detox program, in a joint effort to achieve the complete elimination of hazardous chemicals in the textile industry - and thus be able to protect the health and safety of consumers, as well as the conditions of local communities.

The **Gruppo Mapel** wishes to be recognized as a Virtuous Entity, thanks to its global commitment to environmental protection, product safety and the internal traceability of all information related to its supply chain.

3.C.2. RESPECT FOR NATURAL RESOURCES AND EFFICIENCY IN THE USE OF MATERIALS AND RESOURCES

Development that is said to be sustainable is based on at least three conditions being met:

- the rate of utilisation of renewable resources must not exceed their rate of regeneration;
- the input of pollutants and waste into the environment must not exceed the carrying capacity of the environment;
- the stock of non-renewable resources must remain constant over time.

These constraints, in order to be realised, require first of all an awareness of all, through the orientation of their daily lives towards behaviours defensible over time and strongly oriented to the respect of the rules.

The monitoring of the materials used is an essential requirement demanded by **Gruppo Mapel** from all its Recipients.

3.C.3. PRESERVATION OF BIODIVERSITY

The diversity of species, the genetic diversity within the species and the diversity of ecosystems present on the planet, guarantee the nourishment of all living beings and therefore also of man. Its mechanisms regulate fundamental processes, such as the composition of soil, climate, air, water and nutrients: immense riches that are increasingly threatened by man's dominance over nature. Threats, which according to researchers, can exacerbate into numerous problems, among which the most serious is certainly the extinction of many species in the not distant future.

A reversal of course is possible, but it is necessary to promote the formation of an international policy that has the will, including economic, to try to preserve nature and stop the loss of life on Earth.

Gruppo Mapel is moving in this direction, promoting every initiative aimed at responsible consumption in order to safeguard biodiversity, and asks that the Recipients of this document do the same as far as possible (through suggestions, recommendations, the promotion of a responsible culture).

To ensure progress in this area, objectives and targets must be clear and include a strong focus on results, linked with a mechanism of strong accountability on the part of its stakeholders.

3.C.4. RESPONSIBLE USE OF WATER

Water is an essential resource for productive activities (from agriculture to industry), which helps to sustain work and employment, but above all an essential source for food and life. Without water it is not possible, for example, to produce crops and have enough to sustain ourselves, a situation that occurs daily in many countries around the world. Without a true understanding of the value of this source, we will not be able to safeguard this fundamental resource for the good of all.

Everyone must do his or her part, starting with the awareness that we must reduce water wastage, optimise its distribution and comply with regulations on water withdrawal and discharge.

First and foremost, **Gruppo Mapel** and its Recipients must make a moral commitment to use water resources responsibly and to adopt appropriate measures to reduce water withdrawals and encourage its reuse, as well as to comply scrupulously with all applicable legislation on water management, wherever our activities are carried out.

The water cycle is in fact our most important ecosystem and must be protected in every way.

3.C.5. OPTIMISING WASTE USE AND REDUCING WASTE

Economic development means widespread well-being and the supply of increasingly numerous and diversified products. But growth in consumption also means a large amount of waste, with an ever-increasing trend, which is unsustainable for our environment. Waste, in general, is any object or substance that we discard: residues, scraps, leftovers, broken or unusable objects, the result of domestic activities or production processes.

Waste produces pollution (such as sewage, gases, toxic substances, non-biodegradable materials) and can pollute air, water and land, with the use of space and resources (human and economic) for its treatment, but also to remedy the environmental and health damage that it produces.

It is not possible to totally eliminate the production of waste, however we can, with individual and collective actions, limit the amount and the danger of waste. By limiting the production of waste and increasing separated waste collection and recovery, we can limit the construction of landfills and incinerators, with consequent advantages for the protection of the environment.

Gruppo Mapel and its Recipients, in particular, can:

- adopt production cycles that reduce waste and its danger, limiting the use of energy and raw materials;
- use secondary raw materials (obtained from recovery);
- create long-lasting, repairable objects designed for easy material recovery;
- adopt the use of products with recoverable packaging (such as, for example, the "returnable packaging);
- introduce, where possible, consumer dispensers (commonly called "on tap").

Designers play a fundamental role in the scenario of sustainable production and can map out the best way to achieve an "ecological" product, also thanks to Life Cycle Design, an environmentally friendly design methodology that aims to reduce the environmental impact of an industrial product within its life cycle.

Recipients are therefore required to think about the responsible use of resources (because many objects we discard can potentially be recovered and have a new life) and to comply with the laws and regulations in force regarding waste management (hazardous and non-hazardous), ensuring the proper collection, transport, recycling/treatment and disposal, at all stages of the production process.

3.C.6. MITIGATING AND SLOWING CLIMATE CHANGE

Climate change is there for all to see. Floods, heat waves, storms and storm surges, droughts and global warming are just some of the symptoms of ongoing climate change.

If we want the Earth to continue to be a hospitable place for all, the climate must be protected.

We are paying a very high price, while unscrupulous people, such as those who manage the giants of fossil fuels or industrial agriculture, make profits at the expense of our planet, without taking responsibility.

An alternative does exist and must be pursued by investing in renewable sources (solar, photovoltaic, wind, etc.) and energy efficiency.

Gruppo Mapel and its Recipients are required to monitor the consumption of its energy resources, constantly seeking to reduce them (especially those emitted into the atmosphere, which produce greenhouse gases), or replace them (with particular attention to those derived from coal), where possible, with renewable sources.

3.C.7. RESPECT FOR ANIMALS

The **Gruppo Mapel** is committed to respecting the rights of every animal, and requires the Recipients of this document to use the same regard for the protection of animal rights, at every stage of their existence.

From this perspective, man, as an animal species, cannot claim the right to exterminate other animals, or to exploit them in any way, in contravention of their rights. Nor, for the same reason, can he mistreat them, subject them to cruel acts, deprive them of freedom of movement, adequate space for a dignified life and carried out in the same way as his kind, in accordance with experience and scientific knowledge. If the killing of an animal is necessary, it must be instantaneous, without pain or distress.

Recipients must therefore comply with all applicable laws on animal and plant species, especially those of threatened and endangered species, and support initiatives and associations for the protection and preservation of animals.

3.D. PRODUCT RESPONSIBILITY

3.D.1. SUSTAINABLE PRODUCTION DEVELOPMENT

Gruppo Mapel promotes development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

Our environmental influence, in fact, is not only aimed at helping companies, defending their turnover and growth opportunities, but is also geared towards improving their ecological footprint. Environmental protection is an issue to be addressed, going beyond phrases and images, supporting virtuous projects and enlightened organizations with our activities. The issue of pollution and resource supply concerns everyone, and that is why we believe so strongly in educating individuals and especially young people, with a focus on the wonders of the world and human capabilities, rather than on the convenience and ease of destroying them.

The implementation of these goals contributes to the realization of overall development plans, the reduction of future economic, environmental and social costs, improvements in economic competitiveness and poverty reduction. This requires a systematic and cooperative approach among stakeholders in supply chains, from producer to consumer. This also requires involving consumers in initiatives to raise awareness of sustainable consumption and lifestyles, providing them with adequate information on standards and labels.

Gruppo Mapel promotes the use of recyclable, renewable, reusable materials with low environmental and social impact, and asks all stakeholders to promote and encourage a sustainable and circular economy.

3.D.2. CHEMICAL SAFETY OF ARTICLES

Chemicals are present in many products that reach consumers daily and affect their costs, at all levels, such as when water and energy are used intensively to make or dispose of them, or when dealing with possible risks and negative impacts on the environment and human health. It is precisely for these reasons that the diversity and potential severity of these impacts make chemicals management a crucial matter for sustainable development.

Users, therefore, must be adequately informed (such as, for example, through Safety Data Sheets, SDS), in order to contribute significantly to the reduction of related risks, including through an informed choice of products and their responsible use.

The limitation of any damage to health and the environment can be guaranteed by the evaluation and management of substances throughout their life cycle, from production to disposal and recycling.

For these reasons, the Recipients are required to comply with the regulations governing the use of hazardous or restricted substances (international, EU, national and local), starting with strict compliance with the REACH directive and any restricted substance lists drawn up by **Gruppo Mapel** (Restricted Substances List - RSL, Product Restricted Substances List - PRSL, Manufacturing Restricted Substances List - MRSL), etc.

The responsible choice of materials starts with the exclusive use of permitted substances, ensuring the health and safety of consumers and all operators who may come into contact with them, at every point in the production chain.

Gruppo Mapel reserves the right to verify compliance with these standards, by carrying out tests and trials on materials, at any point and time during the production cycle.

3.D.3. TRACEABILITY IN THE PRODUCTION CHAIN

Traceability is the activity that makes it possible to document the history of products and processes, through the constant and punctual recording of all operations carried out by each entity: a necessity demanded in order to verify possible environmental and social risks, which each Recipient must guarantee to have and provide, upon request, in relation to all components used (raw materials, semi-finished and finished products).

Gruppo Mapel's traceability is structured on several levels and makes it possible to know the origin of every raw material held (through the use of a chemical database), the entry of each batch of material received (through registration in the warehouse of the relevant batches) and the orderly association, at each level, of each batch used in production (thanks to the bill of materials declared in production orders).

Traceability means Documentation to confirm the value of safety!

CHAPTER III – RELATIONS WITH THIRD PARTIES

4.A. RELATIONS WITH PUBLIC AUTHORITIES AND INSTITUTIONS

Relations with all Authorities and Public Institutions, whether national, EU or international, are based on the strictest compliance with the laws in force, and conform to the principles of integrity, honesty and clarity. Relations with all government officials and public institutions, whether national, EU or international, must not be influenced in any way.

Gruppo Mapel employees must absolutely avoid the following behaviour:

- promising or acknowledging business and/or commercial advantages to officials involved in negotiations or connected to them (e.g. family members, friends, etc.);
- giving gifts or other benefits (except for acts of courtesy or commercial promotion of modest cost, authorised in advance);
- reporting false or partial information, or failing to report significant facts, where requested.

It is also strictly forbidden for representatives and/or employees of the **Gruppo Mapel** to pay, directly or through third parties, sums of money or other benefits of any nature or entity to public officials and similar, whatever their position and the reason for the transaction.

Gruppo Mapel refuses all gifts or the receipt of gifts which may even only be interpreted as exceeding the normal practices of commercial courtesy or in any case aimed at obtaining favourable treatment for itself or for the companies of the Group.

Those who receive gifts or other benefits, other than those of modest value and as part of ordinary business courtesy, must inform the Administration, which will arrange for them to be returned or donated to charity in accordance with the specific company regulations on the subject.

4.B. CUSTOMER RELATIONS

The **Gruppo Mapel** bases its activities on the quality of its products and services, to be considered not only as product value but also as competence in satisfying the specific needs of its customers, thanks to the extreme professionalism, availability and speed of response of each department and the almost non-existent number of complaints... a clear and objective sign of the satisfaction of its customers, which is still growing today.

Gruppo Mapel is committed to disclosing the qualitative and quantitative indicators of its Service Charters in order to be able to report on the results achieved. The indicators constitute the information on which customers can assess the quality of the service provided.

To this end, it undertakes to

- adopt quality management systems and define specific objectives as well as service improvement programs;
- provide institutions with all the information necessary to understand any risks to the safety of the community linked to the company's activities and the quality of the service provided;
- promote awareness and training activities regarding the quality of service;
- make known to customers how to make complaints and provide appropriate responses to complaints.

By giving priority to clarity, with predominantly written communications, misunderstandings are avoided and existing business relationships are effectively implemented.

In particular, notices, contracts, documents and any other communication issued by the Group must be:

- clear and simple, formulated in language that is as direct and commonly used as possible;
- complete and truthful, so as not to overlook any element relevant to the decision-making process for current or potential clients;
- respectful of the provisions on the protection of Privacy.

Gruppo Mapel is committed to adopting tools for monitoring and evaluating customer satisfaction by publishing, on an annual basis, data and information on perceived quality, which form the basis for undertaking improvement actions.

Customer satisfaction is a fundamental element for the growth of the Group, which intends to act as a supplier of solutions, capable of understanding needs and offering high quality products and services. In the **Gruppo Mapel**, daily actions are aimed at providing a unique and reliable response to customer expectations. The organization, professionalism and culture of the **Gruppo Mapel** evolve with a focus on listening and Customer service.

4.C. SUPPLIER RELATIONS

Gruppo Mapel conducts its relationships with its suppliers in the same way as with its customers. The supply chain is now strongly established and these long-lasting partnerships bring considerable added value.

Gruppo Mapel's conduct in the procurement of goods, services and work, is based on the search for quality and cost-effectiveness and on the recognition of equal opportunities for each supplier.

The Group is committed to developing cooperative relationships with its suppliers based on communication aimed at the mutual exchange of skills and information and promoting the creation of common value.

Situations of dependence must be avoided, both for the Group and for the supplier.

Purchasing conditions are made on the basis of objective and impartial expectations, justified by the very high quality required but also by the price and the relative guarantees provided.

The **Gruppo Mapel** adopts the following criteria in its relations with suppliers:

- purchasing is entrusted only to specially authorised specialists;
- no forms of "exchange" with suppliers are allowed: the goods/services requested are chosen and purchased only on the basis of their value in relation to the benefit requested and the relative price and quality;
- any bargaining with a supplier, current or potential, concerns only the goods and services that are strictly necessary;
- no form of pressure or gift is envisaged (including donations of materials, products and/or sums of money to anyone, etc.).

In relations with suppliers, the Recipients of this Code undertake to manage clear and honest relations, adopting, where possible, documents in written form (to avoid misunderstandings regarding requests). Commitments and relationships with suppliers (including potential ones) must be conducted in compliance with the provisions of this Code of Ethics and the laws in force regarding conflicts of interest.

4.D. RELATIONS WITH POLITICAL AND SOCIAL ORGANISATIONS

Gruppo Mapel contributes to the prosperity of its community, respecting local and national communities, in the strictest compliance with current laws.

Relations with representatives of institutions (political and administrative) are based on collaboration and dialogue, refraining from maintaining relations with organizations, associations or movements that pursue, in any form, aims that are criminal and/or against the law.

CHAPTER IV – RULES OF CONDUCT

5.A. IMPLEMENTATION METHODS

The Recipients of this Code of Ethics are responsible for guaranteeing their compliance with its principles and with the methods of conduct envisaged for its implementation, by returning a copy of the same, duly completed with their own data, after signing the Acceptance Form at the end of this document.

It is also their duty to disseminate and ensure compliance with all the provisions of the Code to their employees, suppliers, collaborators and, more generally, to any party forming a link in the chain of supply of materials and/or services, verifying their respective compliance.

Gruppo Mapel understands the principle that achieving full compliance with this Code requires a gradual and constant effort, in relation to the resources introduced for the purpose. To this end, the Recipients have the duty to encourage all preparatory activities, as well as to prepare all the necessary tools to ensure the correct and timely receipt of reports of possible non-compliance.

Recipients who detect non-compliance with this Code must notify **Gruppo Mapel** and, if necessary, also request its support in order to agree on measures and actions to be taken to resolve the anomalies in a timely manner.

The **Gruppo Mapel** is also available to provide the necessary answers to queries or uncertainties related to this Code of Ethics, through the appropriate contacts listed in this document.

5.B. CONTROL SYSTEMS

Gruppo Mapel identifies the internal control system as the primary indicator of the validity of its activities, and asks all stakeholders to comply in the same way, consistently with the principles of this Code of Ethics. To this end, the Group therefore suggests the creation of a solid organizational base, so that the culture of feedback can be encouraged and disseminated at every level of the company, involving all employees, in line with the responsibility of each individual, and increasing the importance of the system of internal audits and consideration of work activities, current laws and company operating procedures and instructions.

From this point of view, all events, operations or transactions pertaining to the company's activities, must be correctly traced in its management system, in compliance with the principles of the laws in force and with the commercial customs applicable in each country, so that each item is verifiable, legitimate, consistent and appropriate, possibly also showing who authorised it.

In short, each action must meet the requirements of truth, completeness and transparency of the recorded data. An appropriate and complete set of supporting documentation must be maintained for each transaction, to enable:

- the diligent recording of accounts;
- the rapid identification of the features of a specific motivation;
- the simple chronological reconstruction of the operation carried out (and of the actions connected to it);
- the verification of decision-making, authorization and development, with the relative levels of responsibility.

Each Recipient must therefore actively work, to the extent of his or her competence, to ensure that every element of management attributable to the Group is correctly and promptly recorded in the management system.

In order to safeguard the observance of all the principles of this Code of Ethics, **Gruppo Mapel** will be granted the right to carry out (also through delegated persons) the following monitoring activities with regard to Recipients:

- request documentation relating to its principles;
- carry out audits at the production sites and offices of all its direct and indirect stakeholders, through visits.

Gruppo Mapel guarantees from now on the utmost confidentiality of any information it becomes aware of, in compliance with and respect for all regulations and ethical principles owed to its Recipients, and at the same time will consider any refusal or lack of cooperation with respect to the monitoring activities requested as non-compliance.

5.C. MANAGEMENT OF CASES OF NON-COMPLIANCE

Failure to comply with one or more provisions of this Code of Ethics and Conduct represents non-adherence to the principles of the **Gruppo Mapel** and is therefore grounds for the detection of non-compliance.

Non-conformities entail, depending on the seriousness of the violation, the management of one or more corrective actions and, in the most serious cases, the right of the **Gruppo Mapel** to interrupt and/or terminate the relationship with the Recipient (as well as to claim damages, if applicable), if:

- there is a serious or repeated breach of the Code;
- non-implementation of an improvement plan or its methods (times and ways agreed upon);
- refusal or failure to cooperate in the verification and monitoring operations provided for by this Code.



CHAPTER V – FINAL PROVISIONS

6.A. VIOLATIONS AND SANCTIONS

Gruppo Mapel's Code of Ethics expresses, among other things, a general binding principle of the Organization and Management Control Model that **Gruppo Mapel** intends to adopt, as well as being accountable under the Italian regulations on the "liability of entities for administrative offences dependent on crime", included in Legislative Decree no. 231 of 8 June 2001.

Gruppo Mapel assigns the function of Guarantor to its Supervisory Body by formal deed of the competent corporate body, in accordance with the local regulations in force.

The Guarantor is assigned the tasks of:

- monitoring news of possible violations of the Code, encouraging the most appropriate checks;
- intervening, also on the basis of a report by the Recipients of this Code, in the event of violations of the Code;
- communication to the responsible departments of the results of the monitoring carried out and the actions taken (such as, for example, the application of sanctions or the adoption of measures relevant to the relative violations).

Any communication with the Supervisory Body must be addressed, even anonymously, by ordinary mail or electronic mail to one of the following addresses:

Ethics Committee
c/o
MAPEL COMPONENTS S.R.L.
Via Vajone, 7
21020 GALLIATE LOMBARDO (VA) – ITALY

ethics@mapelcomponents.com

oppure

Ethics Committee
c/o
MAPEL TEXTILE S.R.L.
Via Vajone, 7
21020 GALLIATE LOMBARDO (VA) – ITALY

ethics@mapeltextile.com

All Recipients of this document, in the event that they become aware of violations of this Code of Ethics (whether presumed or actual), must promptly inform the Supervisory Body specifically set up in compliance with the Decree. The **Gruppo Mapel** undertakes to keep all reports confidential and undisclosed, without using any form of retaliation against the person making the report.

Compliance with this Code of Ethics must be considered as an integral part of the contractual obligations of the Recipients according to the regulations applicable to them in terms of employment relationships. It follows from this that any violation may constitute a breach of the obligations of the employment relationship and/or a disciplinary offence, in accordance with the applicable regulations and the inherent effects of the law, also with regard to the maintenance of the employment relationship, and may imply compensation for any damages arising therefrom.

Compliance with the principles of this Code of Ethics is part of the contractual obligations undertaken by collaborators, consultants and other Recipients in business relations with the same.

Any violation of this Code of Ethics may also constitute a breach of contractual obligations undertaken, with all legal effects, including the termination of the contractual relationship and possible compensation for consequential damages, as provided for by the applicable regulations.

Any violations by Recipients holding positions of Representation, Administration or Management of the Group, will imply the adoption, by the competent corporate body, of the sanctioning measures considered most appropriate to the nature and gravity of the breach and to the qualification of the author of the violation, in accordance with the applicable regulations.

6.B. ADOPTION OF THE CODE OF ETHICS AND RELATED AMENDMENTS

This Code of Ethics was approved by the Board of Directors on 01/03/2021.

Any new editions or revisions will be approved by the same corporate body and immediately transmitted to all interested parties.

CHAPTER VI – ACCEPTANCE FORM

By signing this form of the **Gruppo Mapel** Code of Ethics and Conduct (Ed. 1.0 of 01/03/2021), the addressee confirms that he/she has:

- having received, read and understood in detail all the provisions contained in this Code;
- endeavour to comply with the Code and with all applicable local, regional and national regulations with respect to the locations of its operations;
- communicate, in all possible ways, to its employees, suppliers, collaborators and persons connected with the **Gruppo Mapel**'s supply chain of goods or services, the contents of this Code and ensure that they also comply with its provisions;
- commit to the achievement of the objectives set out in this Code, in pursuit of continuous improvement and increasingly sustainable development of its activities;
- accept the monitoring procedures established for verifying compliance with the ethical principles established by **Gruppo Mapel**;
- endeavour to pursue the principles set forth in this Code, resolving any non-compliance with the most appropriate corrective and preventive actions, with the utmost cooperation;
- report to the **Gruppo Mapel** any case of violation of this Code (presumed or ascertained), through the contacts specified in this document.

Name or Company Name <i>(in capital letters):</i> <hr style="border: 0; border-top: 1px solid black;"/>	
Place <i>(in capital letters):</i> <hr style="border: 0; border-top: 1px solid black;"/>	Date <i>(day/month/year):</i> <div style="text-align: center;"> _ _ / _ _ / _ _ _ _ </div>
Name and Surname of the Legal Representative <i>(or acting representative, in capital letters):</i> <hr style="border: 0; border-top: 1px solid black;"/>	
Signature of Legal Representative <i>(or acting representative):</i> <hr style="border: 0; border-top: 1px solid black;"/>	COMPANY STAMP:

