



# EUROTEXFILATI S.p.A. Code of Ethics

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## 1

### 1. Introduction and objectives

In accordance with the framework of action established by the European Union, EUROTEXFILATI S.p.A. is interested in developing and implementing all initiatives that help to promote corporate social responsibility. To this end, the company has chosen to commit itself to socially responsible conduct, also by adopting this Code of business conduct. EUROTEXFILATI S.p.A., aware that ethical conduct represents a value and a condition for the success of the Company and that principles such as honesty, moral integrity, transparency, reliability and a sense of responsibility are fundamental foundations for all the activities involved in its mission, has established guidelines for conduct in both in-house and external relations.

More specifically, the ethical principles of this Code acquire considerable importance by helping to confirm the Company's credibility in the civil and economic context in which it operates, and by turning the appreciation of the values underlying the way the company operates into a competitive advantage.

The task of supervising implementation and compliance with the Code of Ethics and its updating is entrusted to the Board of Directors of EUROTExFILATI S.p.A., which has independent powers as regards initiative and control.

## 2

### 2. Addressees and scope of application

The Code of Ethics is intended for the directors, partners and all the employees of EUROTExFILATI S.p.A., and to those who operate, permanently or temporarily, on behalf of the Company (hereinafter, “addressees”).

The Code sets out the rules of conduct to be observed in carrying out professional activities. It also provides guidelines to be followed in relations with colleagues, customers, suppliers and partners, with other companies, associations, public bodies and institutions, political and trade union organisations, and with the media.

EUROTExFILATI S.p.A. undertakes to disseminate the Code to all addressees, who shall observe its contents, and put in place all possible measures in order to facilitate its full application.

## 3

### 3. General principles

Relations and conduct at all company levels are based on the principles of honesty, fairness, transparency, confidentiality, impartiality, diligence, loyalty and mutual respect.

Addressees shall refrain from any activities, even occasional, that may be in conflict with the Company’s interests or may interfere with the ability to make decisions consistent with company objectives.

More specifically, all addressees:

- a. shall avoid situations in which personal interests may lead to conflicts of interest with those of the Company;
- b. shall not, while carrying out their work, pursue any personal interests in conflict with the Company’s interests;
- c. shall not take for their own benefit or for the benefit of third parties, neither directly nor indirectly, any business opportunities intended for the Company;

- d. shall not accept donations, favours or benefits of any kind, with the exception of gifts and business courtesies of modest value\* provided that they are not intended for the purpose of acquiring improper advantages;
- e. shall not make any donations of money or assets, with the exception of gifts and business courtesies of modest value\*;
- f. shall not engage in any business in competition with the Company;
- g. shall operate in relations with third parties in accordance with the law, the rules of conduct in this Code, and with in-company rules and procedures;
- h. shall not use information obtained while carrying out their tasks to gain direct or indirect advantages, and shall avoid any improper and unauthorised use;
- i. shall refrain from behaving in a way that may benefit rival companies;
- j. shall operate in relations with third parties with impartiality, transparency and fairness, avoiding establishing any relations that are the outcome of external solicitations or that may lead to conflicts of interest;
- k. shall refrain from seeking external and in-house recommendations aimed at influencing the employment relationship or securing privileges in this respect;
- l. shall carry out their work in a proper and transparent manner, in accordance with the Company's provisions.

If there is any doubt as to the conduct to be adopted, addressees shall consult their facility manager, if an employee, or their company contact person, if they are not.

*\*Gifts and benefits of modest value are defined as those that are part of normal business courtesy and practice. Gifts or benefits must not, however, compromise the employee's independent judgement, operational fairness, integrity and reputation. In any case, they must not be such as to be interpreted by an impartial observer as being intended to obtain improper advantages.*

## 4

### 4. Protection of workers' rights and dignity

As part of their role, addressees shall promote a working environment devoid of prejudice, respecting the personality of workers. In this regard, addressees shall actively cooperate to ensure an in-house atmosphere that guarantees respect for the dignity of each individual.

Relations among employees of EUROTExFILATI S.p.A. are based on the values of civil coexistence and shall be conducted in compliance with the rights and freedom of individuals, and with the fundamental principles that guarantee equal social dignity without discrimination on the grounds of nationality, language, gender, race, religious belief, political and trade union membership, physical or mental conditions.

Relations between employees, regardless of their levels of responsibility, shall be conducted with loyalty, fairness and respect, without prejudice to the roles and different tasks of the Company. The heads of an organisational unit shall exercise the powers connected with their position in the company with impartiality and fairness, fostering the professional growth of their collaborators and improvement in working conditions. Employees shall be cooperative, carrying out their duties in a responsible, efficient and diligent manner.

## 5

### 5. Protection of company assets and retention of information

Addressees shall be responsible for protecting and preserving the tangible and intangible corporate assets entrusted to them for performing their tasks, and for their use in a proper manner and in accordance with corporate purposes.

Information included in periodic reports and in accounts, both general and analytical, shall comply with the principles of transparency, fairness, completeness and accuracy. In this respect, addressees shall cooperate in properly representing the Company's activities.

Addressees who become aware of omissions, falsifications or neglect of information and documentation shall report such situations to the entities in charge of verification, through their facility manager, if an employee, or their company contact person, if a third party.

Information and documents, data and knowledge shall only be obtained, used or communicated by individuals who are authorised, in general, by their position or department within the company, or who have been specifically appointed.

## 6

### 6. Protection of workplaces

In compliance with the legislation in force concerning the protection of working conditions, the company EUROTExFILATI S.p.A. provides a suitable working environment in terms of the health and safety of its employees, adopting all necessary measures.

Addressees shall comply with the prevention and safety measures put in place.

## 7

### 7. Protection of the environment

EUROTExFILATI S.p.A., without prejudice to applicable legislation, applies all measures intended to reduce the environmental impact of its activities.

The company undertakes to put in place measures to raise environmental awareness and respect among all addressees.

## 8

### 8. Ethical rules regarding third parties

#### 8.1 RELATIONS WITH CUSTOMERS AND SUPPLIERS

In relations with customers and suppliers, addressees shall represent the Company, of which they are an integral part. Customer care is pursued with expertise, professionalism, courtesy, transparency, fairness and impartiality, in the awareness that it is important to ensure expectations are met and to consolidate trust in the Company.

The excellent products and services offered and a willingness to guarantee an immediate and professional response to requests are the distinctive elements of the Company's relations with its clientele. In relations with customers, the conduct of addressees shall be based on the utmost fairness, transparency and confidentiality, avoiding any situations of conflict of interest.

Business relations with suppliers shall be conducted in accordance with the criteria of impartiality, cost-effectiveness, transparency, loyalty and fairness, avoiding any relations that may create personal benefits or conflicts of interest.

Suppliers are selected according to the criteria of transparency, lawfulness, expediency, efficiency and cost-effectiveness for the Company.

## **8.2 RELATIONS WITH INSTITUTIONS AND PUBLIC ADMINISTRATION BODIES, ENTITIES, ASSOCIATIONS, POLITICAL AND TRADE UNION ORGANISATIONS**

Relations with Institutions and Public Administration Bodies, Entities, Associations, Political and Trade Union Organisations are based on the principles of fairness, impartiality and independence, and are reserved for appropriate corporate departments.

Without prejudice to trade union prerogatives under applicable laws and contracts, addressees are aware that any involvement in political activities occurs on a personal basis, in their own time, at their own expense and in compliance with the law.

EUROTEXFILATI S.p.A. does not make any direct or indirect contributions to parties, movements, committees or organisations of a political or trade union nature, or to their representatives.

## **8.3 MEDIA RELATIONS AND GROUP REPRESENTATION**

The Company's relations with the media are reserved exclusively for the company departments in charge, or for addressees explicitly authorised by them. They are conducted in accordance with the Company's communication strategies.

Information and communications are fair, clear and mutually consistent while respecting the confidentiality requirements of conducting business.

Participation, under the name or on behalf of EUROTEXFILATI S.p.A., in events, committees and associations of any kind, whether scientific, cultural or trade, is duly authorised in compliance with applicable procedures.

# **9**

## **9. In-house control system and violation of the Code of Ethics**

The in-house control system is implemented by means of a set of tools and procedures required to direct, manage and verify the activities of EUROTEXFILATI S.p.A., guiding them towards the achievement of corporate objectives and the prevention of related risks.

The overall control system contributes to ensuring compliance with laws, in-house procedures, strategies and corporate policies, the achievement of set objectives, the protection of the

company's tangible and intangible assets, company management according to criteria of effectiveness and efficiency, as well as the reliability of information regarding the Company's in-house and external accounting and management.

For this purpose, each operation and transaction, duly authorised and recorded, is verified with the support of appropriate documentation.

Responsibility for the proper functioning of the in-house control system lies with all the addressees of the Code, within the scope of their departments.

Employees shall promptly inform their direct manager of the occurrence of any situations that may interfere with the proper management of work.

The effectiveness and functionality of the in-house control system is ensured by the supervision and control activities performed by the competent company departments.

Any violation of this Code damages the relationship of trust established with EUROTExFILATI S.p.A. and may trigger legal proceedings and the adoption of measures against addressees, in accordance with legal provisions and with the established contractual procedures.

## THE MANAGEMENT

Approved by the Board of Directors on 9.3.2022