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# CODE OF ETHICS OF CONTACT Pty LTD AND OF ALL ITS COMPANIES

## PREMISES

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The CONTACTO Group with all its activities in the different fields of application has made honesty, transparency, innovation, social and environmental responsibility, institutional values in which the entire holding identifies itself. As part of our entrepreneurial style there is the Code of Ethics that each of our Partners subscribes as part of their business principles.

This document must be a "moral contract" signed by all Company Representatives, external collaborators and Group suppliers. It must become a personal moral bond. It will not directly strengthen the competitive position, but it will do so indirectly if it allows everyone to adopt an ethical vision and a shared culture.

Through "Our commitment", CONTACTO expresses the purpose, the common purpose of the activity of the individuals and groups that collaborate within the organization and have external relations for it. Our commitment is to offer "MADE IN ITALY" products that help promote the ITALY of taste, design, innovation, fashion, luxury and culture in the world, recognized as excellent and of superior quality, made with respect for the environment and dignity of people.

### **People:**

People are the main and constant point of reference for everything we do. The people who consume our products have four basic rights: the right to safety, the right to be informed, the right to choose and the right to be heard.

CONTACTO people represent the central resource for the development and success of the Company. CONTACTO recognizes a fundamental value in the diversity of cultures and talents and wants to attract and nurture people with leadership skills, a passion for "made in Italy" and intellectual curiosity. Consistency, transparency and respect must guide every decision and behavior, in a context of mutual trust and interdependence.

### **Product:**

The product is at the center of all our activities and daily commitments. CONTACTO will focus its efforts on innovation to find and offer superior quality products, perceived by people and customers as distinctive.



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### **Brand names:**

CONTACTO brands are the identity of the company. The support of our brands will be pursued through the consistency of the products and the quality of the communication.

### **Environment:**

CONTACTO is committed to operating in respect of the environment and people's health, well aware of its social and ethical responsibilities towards the communities in which it operates or from which it draws resources.

### **Customers:**

Customers are our partners to achieve business success. We must work with them to enhance the categories in which we operate, always with full respect for the people who will buy our products.

### **Competitors:**

Competitors are our stimulus and the positive challenge to be better and better. CONTACTO is animated by a strong and correct competitive spirit aimed at the continuous improvement of what it does.

### **Profit:**

Profit is an important indicator of the company's health, and is a fundamental element for creating development and well-being

## **Values**

CONTACTO is a Group with a strong identity at the base of which has always been a human and professional "style" made up of fairness in behavior, a balance between respect for people and interest in the Company. Practices and scenarios change, but consistency with these values is and will remain the best business card. CONTACTO considers the UN Universal Declaration of Human Rights, the International Labor Conventions and Recommendations issued by the ILO (International Labor Organization), the Earth Charter drafted by the Earth Council and the principles enunciated as indispensable points in the definition of its values. in the Global Compact proposed by the UN.

### **Honesty and Transparency**

Honesty is the fundamental principle for all of CONTACTO's activities, its initiatives, its products, its reports and its communications and constitutes an essential element of corporate management. Relations with stakeholders, at all levels, must be based on criteria and behaviors of correctness, consistency, loyalty and mutual respect. CONTACTO communicates in a clear, transparent, accurate and timely manner with its stakeholders.

### **Social responsibility**

CONTACTO believes that its entrepreneurial activity, in order to qualify as ethically responsible, must pursue production models that respect and safeguard human rights, the regenerative capacities of the Earth and the well-being of communities, promoting human development in a fair and sustainable way, in awareness that social and ethical responsibility also extends to communities, especially in developing countries, which produce raw materials used for some products.



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### **Centrality of the person - Diversity and Inclusion (D&I)**

In line with its ethical vision, CONTACTO intends to develop the value of each person, respecting physical, cultural and moral integrity, as well as the right to interact and associate with others. CONTACTO pays attention to all aspects inherent to people's lives, since it is human life that inspires all the activities of society. CONTACTO supports and respects human rights in its activities and sphere of influence, offers equal opportunities for the development of its people and protects their privacy. CONTACTO believes that doing the right thing is good for business and that respecting diversity and promoting inclusion can be a source of competitive advantage, creating a more motivated workforce to make the best decisions, based on a deep understanding of people who purchase and consume the company's products around the world. CONTACTO does not tolerate any form of discrimination or exclusion, inter alia with regard to age, culture, ethnicity, nationality, religious belief, race, political opinion, marital status, pregnancy, veteran status, gender and sexual orientation, identity and / or expression of gender, genetic information, health or disability.

### **Labor protection**

CONTACTO guarantees the freedom of association of workers and recognizes the right to collective bargaining. It undertakes not to use, even indirectly, both forced and compulsory labor and child labor. Rejects any discrimination based on age, sex, sexuality, state of health, race, nationality, political opinions and religious beliefs; rejects any form of discrimination in hiring policies and in the management of human resources. CONTACTO undertakes to prevent any form of mobbing and exploitation of work, both direct and indirect, and to recognize in merit, work performance and professional potential the determining criteria for wage and career developments.

### **Environmental protection and animal welfare**

CONTACTO's commitment to the Earth is aimed at safeguarding its abundance and beauty for present and future generations, with the aim of transmitting to them the values and traditions that support the long-term development of human communities and environmental. CONTACTO undertakes at every stage of its action to apply caution criteria - the "Precautionary Principle" - and a preventive approach to the environment and its biodiversity; to promote initiatives for greater corporate environmental responsibility; to develop the use of means and technologies that do not harm the environment. Both in the choice of raw materials and in the distribution of products, CONTACTO strives to respect "Food Sovereignty" 4, in the awareness that ethical-social responsibility also extends to the communities that produce the raw materials. CONTACTO's commitment to safeguarding the planet and the well-being of present and future generations also includes the welfare of animals. CONTACTO, in fact, does not test its products or raw materials on animals, nor does it finance or support, directly or indirectly, animal testing, unless this is strictly necessary by order of the competent authorities or is required by law, regulations or safety requirements. CONTACTO dissuades its suppliers from the use of animal testing and strongly supports the use of alternative methods to animal testing.

### **Compliance with laws, codes and regulations in force**

CONTACTO considers compliance with national and international regulations as a binding and essential condition for its actions. It therefore undertakes, also with careful prevention work on the consumption of offenses, to comply with these regulations as well as generally recognized practices. It also inspires its decisions and behaviors to the possible evolutions of the regulatory framework.



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## **Rules and standards of conduct**

### **Relations with stakeholders**

Relations with stakeholders, at all levels, must be based on criteria and conduct of absolute correctness, collaboration, loyalty and mutual respect. CONTACTO considers as its stakeholders: shareholders and financiers, Company Representatives and external collaborators, customers, suppliers, competitors, public administration, product buyers, communities, local communities, mass media.

### **Marketing and communication**

All marketing activities must move in full compliance with the different customs and different values, in terms of production and consumption. It is therefore necessary to consider the buyers of CONTACTO products as real interlocutors: "people" who have the right to receive all the information necessary to make an informed choice at the time of purchase, and not just as simple "consumers" of the product. In order to achieve the business objectives, CONTACTO therefore has the duty to: - guarantee people a relationship based on trust and loyalty; - take into consideration, in addition to "needs", also those natural intellectual and cognitive needs that push people every day to ask themselves what they are consuming.

CONTACTO communication:

- it will always respect the centrality of the "person" with all its articulated system of physical, psychological, cultural and emotional needs: market logic must never hinder full disclosure transparency regarding the content and correct use of products;
- will reject vulgar, contradictory, uncertain or ambiguous messages;
- will always have in mind their responsibility in influencing people's choices, guaranteeing the quality of the relationship between the company and people.

### **Information and reporting**

All information and dialogue activities with stakeholders must have characteristics of clarity, transparency, timeliness, completeness and consistency, in compliance with the right to information. Each employee is required to collaborate so that the management facts are represented correctly and promptly in the accounts on the basis of truthful, accurate, complete and verifiable information. Each operation and transaction must be correctly recorded, authorized, verifiable, legitimate, consistent and congruous. It is the responsibility of each employee to ensure that the supporting documentation is easily traceable and ordered according to logical criteria. No false or artificial accounting entries can be entered in the accounting records of the Company (or the Group) for any reason. No employee may engage in activities that result in such an offense, even at the request of a superior.

### **Internal control**

CONTACTO recognizes the utmost importance to internal control understood as a process, carried out by Company Representatives, aimed at facilitating the achievement of company objectives, safeguarding resources, ensuring compliance with applicable laws and regulations, preparing financial statements and economic data- reliable, truthful and correct financial statements. For this purpose, CONTACTO has created and developed over time a set of tools, procedures and mechanisms suitable for managing the operation and monitoring of the organization. Well aware that the internal control system represents an element that characterizes good company management, CONTACTO undertakes to work so that the sensitivity of staff to the need for control can be increased at all organizational levels. At the same time,



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all Company Representatives must feel responsible for updating and managing an effective internal control system. For this reason, the management must not limit itself to participating in the control system within the scope of their competences, but must commit to sharing its values and tools with each collaborator or colleague. Everyone must feel responsible for safeguarding the Company's assets (whether tangible or intangible) and for their proper use. It is forbidden to misuse or damage the Company's assets and resources and to allow others to do so.

### **Corruption and bribery**

CONTACTO undertakes to implement all the necessary measures to prevent and avoid corruption and extortion. It is not allowed that sums of money are paid, other forms of corruption exercised in order to procure direct or indirect benefits to the Company itself. It is forbidden to accept gifts or favors from third parties that go beyond the normal rules of hospitality and courtesy. This applies both in the event that a Company Representative pursues an interest other than the corporate mission or personally takes advantage of business opportunities.

### **Diligence and fairness in the management of contracts**

Contracts and work assignments must be carried out in accordance with what is consciously established by the parties. For a correct management of contractual relationships CONTACTO undertakes not to exploit dominant positions with respect to its counterparties and to guarantee a wide and exhaustive information to all employees and collaborators involved in the activities envisaged by the stipulated contracts. 4.7 Information protection CONTACTO recognizes that digital intangible assets have acquired increasing importance over time and considers information security, and compliance with the related principles of confidentiality, integrity and data availability, as an integral part of its activities. CONTACTO undertakes to protect its information systems from illegitimate access and unauthorized disclosure of the information processed, while ensuring full compliance with applicable regulations on the protection of personal data and information security standards.

### **Indication of the methods of implementation and control**

#### **Scope of application of the Code of Ethics**

Recipients of the Code of Ethics are all Company Representatives, without exception, and all those who, directly or indirectly, permanently or temporarily, establish relationships or relationships with CONTACTO and work to pursue its objectives. Each Company Representative, external collaborator, consultant, supplier, customer is obliged to comply with this Code of Ethics and must accept it explicitly. CONTACTO also requires its main suppliers and partners to behave in line with the general principles of this Code, considering this aspect of fundamental importance to pursue an ethically responsible production model. CONTACTO Company Representatives are obliged to know the rules, refrain from conduct contrary to them, contact the superior or the Supervisory Body or the Group Ethics and Compliance Committee in charge for clarifications or complaints, collaborate with the appointed structures to verify violations and not to hide the existence of a Code from counterparties. In business relationships, the counterparties must be informed of the existence of rules of conduct and must comply with them. CONTACTO, through its Company Representatives, undertakes to collaborate with each Public Authority, to foster a corporate culture characterized by the awareness of existing controls and a mentality oriented to the exercise of control. It will also seek to deepen and update the Code of Ethics in order to adapt it to the evolution of civil sensitivity and relevant regulations for the Code of Ethics itself. In particular, the management is required to observe the Code in proposing and implementing the projects, actions and investments of the company and the members of the Board of Directors, in setting the business objectives, must be inspired



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by the principles of the Code. Those who occupy positions of responsibility in CONTACTO (top management) are in fact required to be an example for their employees, to direct them to comply with the Code and to encourage compliance with the rules. They must also report to the body in charge all useful information about any deficiencies in controls, suspicious behavior, etc., and change the control systems of their function on the recommendation of the body itself.

### **Establishment of monitoring committees**

CONTACTO undertakes to enforce the rules through the establishment of a Group Ethics and Compliance Committee (with competence extended to the entire CONTACTO Group) and a Supervisory Body (with specific competence for the Group companies with registered office and main activity in Italy), hereinafter collectively "Committees", to which to delegate the supervisory and monitoring tasks regarding the implementation of the Code of Ethics, according to their respective competences and geographical area of operation. These Committees will deal in particular with:

- constantly monitor the application of the Code of Ethics by the interested parties;
- manage any reports concerning violations of the Code of significant importance;
- to express binding opinions on any revision of the Code of Ethics or of the most relevant company policies and procedures, in order to ensure consistency with the Code itself;
- report any violations to the Board of Directors and the Board of Statutory Auditors of the violations committed by the managers of the Company.

### **Reporting violations of the Code of Ethics**

It is the duty of the aforementioned Committees to report, to the corporate subjects appointed to impose sanctions, the violations committed by Corporate Representatives or external collaborators of the company to the relevant managers, proposing the adoption of appropriate disciplinary measures. CONTACTO has activated adequate communication channels, consisting of specific email addresses and an online platform, through which the interested parties can send their reports regarding the application or violations of the Code. Alternatively, all interested parties can report, in writing and anonymously, any violation or suspected violation of the Code of Ethics to the Committees responsible for supervising the implementation of the Code. The Committee responsible for managing the report consequently:

- analyzes the report, providing feedback to the author of the report and listening, when necessary, to the person responsible for the alleged violation;
- acts in such a way as to guarantee the whistleblowers against any type of retaliation, understood as an act that may give rise to even the mere suspicion of being a form of discrimination or penalization;
- ensures the confidentiality of the identity of the whistleblower, without prejudice to legal obligations;
- in the event of ascertained violation of the Code of Ethics, report the report and any suggestions deemed necessary to the top management or to the functions concerned, according to the seriousness of the violations;
- these define the measures to be adopted according to the regulations in force and according to the disciplinary system adopted by the Company; they ensure its implementation and report the outcome to the Committee responsible for monitoring the Code of Ethics.

### **Communication and dissemination of the Code of Ethics**

CONTACTO undertakes to promote and guarantee adequate knowledge of the Code of Ethics by disclosing to the interested parties through appropriate and adequate communication activities. In order for anyone to standardize their behavior to those described here, CONTACTO will ensure an adequate training program and continuous awareness of the values and the ethical rules contained in the Code.



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### **Conflict of interest**

To ensure maximum transparency, CONTACTO and its employees undertake not to find themselves in situations of conflict of interest with employees of any Authority and their families. Each Company Representative who deems himself to be in a situation of conflict between his personal interest, on his behalf or on behalf of third parties, and the interests of the Company, must immediately notify, as appropriate, to his / her superior, to the Board of Administration, the Board of Statutory Auditors and / or the Supervisory Body / Ethics Committee, while the specific rules provided for by the Civil Code remain valid. In particular, Company Representatives and other persons or entities with the objective possibility of influencing the choices of the Company, must absolutely avoid using their position, even if only implicitly, to influence decisions in their favor or in favor of relatives, friends and acquaintances for purposes purely personal of whatever nature they are.

### **Gifts, presents and other forms of benefits**

CONTACTO Company Representatives must not accept, even on holidays, gifts and other benefits related to their professional activities and which are not of modest value. Any Company Representative who receives, directly or indirectly, requests or offers of gifts or benefits exceeding the reference amount, must be authorized by the manager or direct superior, if employee, and must notify the Supervisory Body. Company Representatives do not ask for themselves or for others, nor do they accept gifts or other benefits from a subordinate or his relatives. The employee does not offer gifts or other benefits to a superordinate or his relatives or cohabitants, except those of modest value for use. In any case, the Corporate Representatives of CONTACTO refrain from practices that are not permitted by law, by commercial uses or by any ethical codes of the companies or entities with which they have relations.