

DEDAR

MILANO

CODE OF ETHICS

DEDAR
MILANO

SUMMARY

1

INTRODUCTION	6
--------------	---

1.1 Dedar’s values	
--------------------	--

2

RECIPIENTS OF THE CODE OF ETHICS	8
----------------------------------	---

3

GENERAL PRINCIPLES	10
--------------------	----

3.1 Legality	
3.2 Fairness	
3.3 Conflict of interest	
3.4 Confidentiality	
3.5 Protection of diversity	
3.6 Respect for Human Rights	
3.7 Sustainable Development	

4

PRINCIPLES AND RULES GOVERNING RELATIONS WITH STAFF	12
--	----

4.1 Management and development of people	
4.2 Health, safety and well-being	

5

PRINCIPLES AND RULES REGULATING RELATIONS WITH EXTERNAL RELATIONS	14
--	----

5.1 Authorities and Public Administrations	
5.2 Suppliers and Customers	
5.3 Competitors	

6

PRINCIPLES OF COMPANY MANAGEMENT	16
----------------------------------	----

6.1 Anti-corruption	
6.2 Protection of company assets	
6.3 Intellectual and industrial property	
6.4 Communication	

7

IMPLEMENTATION OF THE CODE OF ETHICS	18
--------------------------------------	----

1

Introduction

Dedar S.p.A. (hereinafter “Dedar” or “Company”), has always pursued the mission of offering products and services of excellence and high quality, acting responsibly and in compliance with the needs of all its stakeholders. The Company, indeed, is deeply convinced that there can be no sustainable growth and development in the long term without the integration of the ethical principles of honesty, reliability, respect, fairness and transparency within the business.

Dedar’s Code of Ethics translates these principles into rules of conduct to guide the actions of all those who daily contribute to achieving the corporate mission. Therefore, all activities must be carried out in compliance with the laws and regulations in force in the countries in which Dedar and its companies operate, as well as the values and principles outlined in this Code.

In defining and regulating corporate conduct, the Code of Ethics is inspired by the most important international standards and guidelines in the field of human rights and corporate social responsibility including by way of example but not limited to, the Universal Declaration of Human Rights of the United Nations, the Ten Principles of the Global Compact, the International Labor Organization Conventions.

1.1 Dedar’s Value

Dedar bases its philosophy and professional culture on its commitment to spreading beauty and improving the quality of the environments in which people and communities live, enriching them with harmony and art. Integrity, responsibility, sharing, excellence, passion and style and creativity are the founding values of Dedar’s culture:

INTEGRITY: The Company acts with fairness and consistency, seeking the authenticity of its proposal and the distinctive features that make it unique.

RESPONSABILITY: aware of its own impacts and the influences that the Company may have both inside and outside the organization, Dedar undertakes to operate responsibly towards its Collaborators, local communities, and the environment.

SHARING: Dedar recognizes the value and potential that derive from relationships and constructive exchange; for this reason, it is committed to enhancing its stakeholders by listening and trusting others.

EXCELLENCE: the ambition and the search for the highest levels of quality and perfection, push the Company to take care of the development of skills and to value people, whose talent is a fundamental element and strategic resource for the growth of the business and the territory to which it is bound.

PASSION: passion is that emotional and motivational drive that every day spurs Dedar’s people to operate at the best of their abilities and to transmit enthusiasm for their creations to Partners and Customers.

STYLE AND CREATIVITY: Dedar combines the values of beauty and tradition with innovation in techniques and design. These are the key elements of the brand’s stylistic research, characterized by an identity permeated with elegance, art, balance and harmony that conveys the moral and aesthetic virtues on which the Company is founded.

2

Recipients of the code of ethics

This Code of Ethics (hereinafter also the “Code”) applies to the members of the Board of Directors and to all Employees of Dedar, who are required to adopt conduct in line with the principles and rules contained in the Code both in relationships with other employees, as well as outside the Company, in relations with institutions, trade unions, Suppliers, Customers, Partners, and the media. The Code extends to the subsidiaries, Dedar France S.a.s., Dedar Middle East Fzko, Dedar UK Ltd, Dedar GmbH, Dedar Inc and Dedar Asia Pacific Pte. Ltd.

Dedar also expects that Suppliers, Consultants, Collaborators, and all Partners external to the Company, understood as those who have contractual relationships or act on behalf of Dedar or in its interest, follow the ethical principles indicated in this Code.

Each Recipient is required to be aware of the Code of Ethics and to comply with its rules in carrying out their activities. In this regard, Dedar commits to disseminate the contents and objectives of the Code within the organization and to communicate them to stakeholders outside the Company.

3

General principles

The Company bases its business on compliance with the principles stated in this Code and reserves the right not to engage in relations with anyone who demonstrates that they do not share the contents of the Code of Ethics and violates its rules of conduct.

3.1 Legality

Dedar operates in full compliance with the laws. Likewise, all Recipients are required to act in compliance with current regulations, and in no way can the pursuit of the Company's interest justify dishonest or illegal conduct. The Company also conducts its tax and accounting activities ensuring the truthfulness and maximum transparency of the information, to protect the ability to generate value and the corporate reputation.

3.2 Fairness

All persons acting on behalf of Dedar are required to behave with fairness, impartiality, and honesty. The acceptance or realization of donations, gifts, or favors from or to third parties, aimed at obtaining advantages in an improper and unethical manner, is an illegitimate practice and prohibited by the Code, except in cases in which the Company authorizes the offer of commercial courtesy gifts.

3.3 Conflict of interest

Recipients must refrain from pursuing personal activities that may give rise to a conflict with the interests of the Company. In the event that the Recipients detect the possibility that there is a conflict of interest, they are required to immediately notify the administration so that the Company can proceed to assess the situation.

3.4 Confidentiality

Dedar undertakes to protect the confidentiality and not to misuse the personal data of stakeholders. Similarly, the Recipients are required to act in compliance with the confidentiality obligations that the Company assumes towards third parties and not to use confidential information learned during the exercise of their work for purposes unrelated to the conduct of professional activities.

3.5 Protection of diversity

The Company does not tolerate discriminatory behavior and unequal treatment for reasons based on gender identity, sexual orientation, political orientation, cultural affiliation, ethnicity, religious belief, disability. All people are evaluated exclusively for reasons related to merit and the skills necessary to carry out business activities. The Company is also committed to promoting the values of diversity and inclusiveness, elements that contribute to bringing artistic wealth and innovation to the business.

3.6 Respect for Human Rights

Dedar acts in full compliance with the rights of workers and Human Rights enshrined in national laws and Community and international guidelines. Furthermore, it undertakes to promote respect for these rights also outside the Company, especially in the activities carried out by Suppliers and Partners also operating in other jurisdictions. In this regard, Dedar condemns and bans the practices of child labor and forced labor.

3.7 Sustainable development

Dedar is committed to integrating the principles of respect and protection of the environment and society, as well as animal welfare into its business conduct, taking on more and more awareness of the impacts related to its activities and mitigating the related socio-environmental risks. In particular, the Company is committed to researching and implementing solutions to reduce the environmental impact of products. In addition, Dedar repudiates any form of abuse of animals in farming practices to obtain natural fibers of animal origin. The Recipients are asked, with the help of the Company, to become aware of their role concerning the issues of social and environmental sustainability and to contribute to the protection of the environment, as well as to the development of an equitable society.

4

Principles and rules governing relations with staff

4.1 Management and valorization of people

Dedar recognizes the value of each Employee and Collaborator, who, with enthusiasm, dedication, and ability, constitute a strategic resource of the Company. For this reason, the Company is committed to fostering a climate of personal and professional growth and exchange, providing tools and opportunities for continuous learning.

Dedar welcomes and protects diversity, ensuring fair treatment and non-discrimination at all stages of the relationship between the Company and the Employees, starting with the hiring process, which is conducted with impartiality and based on the professional skills of the candidates, for the roles sought. Training and professional growth opportunities are also managed according to principles of fairness, without discrimination and favoritism.

Furthermore, the Company strives to ensure a dynamic work environment favorable to the well-being and development of the potential of each individual, taking care of the quality of relations and cooperation, making available to Employees the tools necessary for the efficient performance of their duties.

4.2 Health, safety and well-being

With the implementation of a health and safety management system in the workplace and compliance with the provisions of the law in force, Dedar undertakes to protect its Collaborators, by identifying and mitigating health risks in advance. Furthermore, Dedar actively promotes the culture of safety through appropriate training activities.

Dedar also promotes a relaxed work environment and is careful to prevent the occurrence of unpleasant episodes, such as being the object of offenses, insults, discrimination, or intimidating behavior by other Employees, Collaborators, or Partners who come into contact with the people of Dedar. In this regard, the Company condemns and prohibits any form of bullying, stalking, sexual harassment, and/or attitudes aimed at harming the dignity and physical and psychological integrity of people.

5

Principles and rules that regulate external relations

5.1 Authorities and Public Administrations

In relations with the Authorities and Public Administrations, Dedar and all Recipients must follow conduct guided by the principles of transparency, honesty, fairness, and good faith, always in compliance with the law and according to the highest ethical and moral standards.

The Recipients must not interact with the Authorities and Public Administrations in the name of Dedar, except for specific authorization of the Company. In addition, Recipients must refrain from exerting any pressure or offering money to representatives of the institutions to obtain profits and personal advantages in an undue manner. The Company undertakes to ensure that such episodes do not occur and that the Recipients are adequately informed and made aware of anti-corruption and integrity of conduct.

5.2 Suppliers and Customers

Suppliers and Customers are required to comply with the ethical principles contained in this Code. Relations with Suppliers and customers are based on the principles of correctness, transparency, loyalty, and professionalism. In no way must the Recipients engage in unfair or deceptive behavior towards Suppliers and Customers, who must be duly informed of the terms and circumstances that govern the relationship with the Company.

Employees and Collaborators are committed to offering punctual and high-quality services to guarantee the highest levels of customer satisfaction.

Relations with Suppliers must be fair, clear, and transparent, stipulated according to objective criteria and objectives agreed during the negotiation phase of the commercial relationship so that no misunderstandings or episodes of abuse occur.

Furthermore, Suppliers are required to comply with the Sustainability Guidelines, which are an integral part of the contractual obligations to be signed when starting the commercial relationship. These Guidelines set out principles and rules regarding the guarantee of the health and safety of workers, respect for human rights, and protection of the environment. In addition to this, the Guidelines require Suppliers to promote these principles along their value chain and report any non-compliance with the envisaged rules.

5.3 Competitors

Dedar acts in compliance with national and EU regulations and behaviors that protect fair competition to promote a free and competitive market, a principle in which Dedar believes and which it deems necessary for innovation, development and growth of the business and society.

6

Principles of company management

6.1 Anti-corruption

In carrying out its daily activities and in all relationships within and outside the Company, Dedar is inspired by the values of honesty, fairness, and good faith and respects the highest ethical and moral standards.

No form of corruption or conduct aimed at offering or receiving undue advantages directed to representatives of public institutions or private organizations is tolerated. Therefore, Dedar will not entertain relations with subjects who do not intend to respect these principles.

6.2 Protection of company assets

Employees and Collaborators are required to carry out their functions by making efficient use of company resources and are responsible for taking care and preserving both tangible, and intangible assets made available by the Company. The use of company tools, especially IT resources, must be limited to the performance of company tasks and their use for unauthorized personal activities is prohibited.

6.3 Intellectual and industrial property

Dedar protects intellectual and industrial property by respecting national and EU laws on trademarks, patents, and copyright. The Company, therefore, undertakes to treat with confidentiality and protect the ideas, designs, and models developed within the Company. Furthermore, the Company and the Recipients undertake not to create and market products that violate the intellectual property rights of third parties or to market or disseminate products already patented and with counterfeit and/or misleading brands.

6.4 Communication

The Company undertakes to make communication channels and methods available to Recipients and all stakeholders to collect the expectations, needs, and requests of stakeholders. Dedar also undertakes to communicate promptly, clearly, transparently, and fully any information that allows stakeholders to make informed decisions.

Dedar promotes communication within the Company to foster a climate of mutual trust, respect, and collaboration. Furthermore, the Company favors correct communication with external groups to foster dialogue with the community and spread the values of Dedar. In particular, relations with the mass media and information bodies are based on principles of correctness and transparency to guarantee the completeness and consistency of the information.

Finally, the Company undertakes to correctly use the means of communication, such as social media, by adopting adequate languages and communicating content that is respectful to all groups and in line with the ethical principles promoted by this Code.

7

Implementation of the code of ethics

The Code of Ethics is approved by the Board of Directors of Dedar S.p.A., which commits to update its contents when necessary.

All Recipients are required to know the Code of Ethics and to report actual or presumed violations of the principles and regulations contained therein. The report must be sent to Dedar S.p.A. by e-mail to hr@dedar.com.

The Human Resources function will examine the reports submitted. Should the investigation confirm the violation, this will be managed by Dedar S.p.A. applying corrective measures and adequate and proportionate disciplinary sanctions. In any case, such violations, if constituting a civil or criminal offense may be prosecuted in accordance with the law.

Suppliers and Business Partners who engage in conduct that are not in line with the rules of the Code of Ethics may be subject to provisions or, in the most severe cases, to termination of the relationship.

Reports and investigations are managed to ensure maximum confidentiality on the whistleblower's identity and comply with current legislation. The Company does not tolerate any form of retaliation against the whistleblower and undertakes to prevent the occurrence of recourse episodes.

DEDAR
MILANO

Code of Ethics

Via della Resistenza 3
22070 Appiano Gentile
t +39 031 2287511
f +39 031 2287533
info@dedar.com

dedar.com

DEDAR
MILANO