



MAGLIFICIO VENEZIA

PURE KNITWEAR MADE IN VENICE



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**Article 1 – Purposes and Content**

Through this Code of Ethics, Maglificio Venezia intends to describe and disclose the commitment that the company and its employees put forward every day, to comply with ethical and social rules, including non written ones.

The main purpose of this Code is to provide continuity to the company, the employees and the entire supply chain, and ensure a solid and long-lasting supply to our customers.

For this reason, we strive every day to spread a culture of Made-in-Italy knitting in our territory, to make people - and young people in particular - aware of the work opportunities for those who chose to pursue a passionate job such as this.

Maglificio Venezia Srl believes in and wants to promote and spread to all internal and external collaborators the following values and principles, included in this Code:

Article 2 - Code Recipients and Diffusion

This Code of Ethics is binding for everyone working for and collaborating with Maglificio Venezia Srl for any reason, in Italy and abroad.

Maglificio Venezia Srl is committed to spread the Code as much as possible, and require its observance in all relationships with its collaborators.

Article 3 - General and Ethical Principles

When carrying out its activities, Maglificio Venezia Srl acts in compliance with current regulations.

Some of the general ethical principles include the principles of transparency and confidentiality, efficiency, correctness, personal and professional enhancement, collaboration between colleagues and competition.

Article 4 - Transparency and Confidentiality of Information

The principle of transparency and confidentiality is based on clear and complete information.

Observing this principle requires a commitment to providing the right information, both inside and outside Maglificio Venezia Srl, in a clear and complete way, by adopting easily and immediately understandable verbal or written communications, after checking the information requirements.

Maglificio Venezia Srl provides clear and accurate information on its production sites and on the characteristics of the products and services supplied to its customers, and abstains from misleading information.

In the same way, alongside all its personnel (Shareholders, Employees and Collaborators, Suppliers and Contractors), it strives to ensure the confidentiality of the information acquired during the working relationship or the commercial relationship with customers. This requirement applies to all collaborators, also and especially in case of termination of the employment relationship.

In order to ensure a smooth information management, Maglificio Venezia Srl strives to make the level of confidentiality easily understandable in the different documents.

Article 5 – Efficiency

The principle of efficiency requires the best professional quality to be input into every work activity, according to the best standards for each field and work profile.



Overtime is primarily managed by employees and collaborators, who will analyse whether it is needed, by themselves or with their supervisors. Only then, if the need to do overtime is not perceived by the employee, will their immediate supervisor request it, according to contract terms.

Article 6 - Correctness and Conflicts of Interest

The principle of correctness implies that everyone, when carrying out their work and professional activities, observes all applicable Laws, contractual agreements and rights of each individual involved. This also entails refusing any type of discrimination against company personnel or internal/external collaborators. All the Code's recipients are required to avoid situations where conflicts of interest may arise, and to abstain from personally taking advantage of business opportunities they became aware of while performing their duties.

The following situations may determine a conflict of interest:

- a) being in an executive position (member of the board of administrators, even as proxy, or the head of a department) and having personal economic interests with suppliers, customers or competitors (share ownership, professional assignments), even through family members or relatives;
- b) maintaining relationships with suppliers and clients, and performing work-related activities - event through relatives and such - for them;
- c) accepting cash or personal favours from people or companies who wish to entertain business relationships with Maglificio Venezia Srl.

Article 7 - Personal and Professional Enhancement and Cooperation between Colleagues

Human resources are key to the development and growth of our business.

For this reason, Maglificio Venezia Srl protects and promotes their professional growth, in order to increase our wealth of skills.

Internal collaborators have been informed of their tasks, roles and objectives, and, after suitable mentoring, they are trained on the behaviour they should adopt, so that they can be more responsible in their day-to-day work and toward their colleagues and external collaborators.

Article 8 – Competition

Maglificio Venezia Srl believes in and promotes the value of competition, by working according to the principles of correctness, fair competition and transparency, toward all the operators on its reference markets. At the same time, it demands behaviours based on the same values also from its competitors.

Article 9 - Customer Relationships

Maglificio Venezia Srl strives to ensure that its customers are completely satisfied with the contracts stipulated and the quality standards set, in compliance with current regulations.

Contracts and communications with customers must be:

- a) clear and simple, formulated with an understandable language, in relation to the interlocutors' abilities;
- b) compliant with current regulations, without resorting to elusive or incorrect practices;
- c) complete, including all elements relevant for the customer's decision-making process.

Maglificio Venezia Srl takes all measures necessary to protect its customers' information and product, and property rights in particular, by contrasting counterfeiting.

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Maglificio Venezia Srl also undertakes not to discriminate its customers, and to establish a relationship characterized by high professionalism, availability, respect, courtesy, research and full cooperation.

Article 10 - Supplier Relationships

10.1 The choice of supplier for goods and services must be guided by the principles of transparency and competition, and based on actual evaluations, concerning competitiveness, quality, utility and price offered.

10.2 Within its goods and service procurement activities, Maglificio Venezia Srl undertakes to promote respect for the environmental conditions, and to ensure that all supplies are compliant with the agreements made and with ethical and legal principles.

10.3 Relationships with suppliers are governed by suitable procedures, arranged by Maglificio Venezia Srl to ensure the utmost transparency. When stipulating a contract with a supplier, this should always be based on extremely clear relationships, without any forms of dependency. When carrying out their functions, the Code recipients shall evaluate the suppliers' integrity and professionalism.

10.4 In order to protect the confidentiality of the information provided by the individuals that get in touch with Maglificio Venezia Srl, the Code recipients shall refrain from disclosing and using such information, gained through their position, for personal purposes.

Article 11 - Personnel Policies

11.1 Employees' obligations

Every employee is required to be familiar with this Code and the relevant standards that regulate their work, within their function.

Maglificio Venezia Srl employees are required to:

- refrain from behaviours that go against the ethical principles;
- consult their supervisors for clarifications on how to apply the principles and provisions contained in the Code of Ethics;
- promptly report any information related to possible violations and any request to violate the Law and this Code they may have received to their supervisors and to the Management;
- respect the workplace and the tools provided by the company to carry out their work.

11.1 Management's obligations

Management is required to comply with current regulations and with this Code. It is also required to supervise the observance of the Law and of this Code by the individuals it supervises, and to adopt the necessary checks and measures to this end. Checks can also be made directly, on a periodic basis, suitable to the type of activity to be assessed. Management actively takes part in every check carried out by (administrative or legal) public authorities.

11.3 Personnel recruitment

Personnel to be recruited is evaluated based on the congruence of the applicants' profiles with those required and with the company's needs, based on the respect for equal opportunities and protection of individuals.

Personnel is hired through a regular contract, and no form of illegal work or exploitation of special collaborations shall be tolerated.

Maglificio Venezia Srl observes all Laws, in order to prevent illegal, forced, undocumented work, or anything that goes against basic personal rights, such as freedom and a suitable and regular compensation, including possible benefits agreed based on current collective agreements.

11.4 Safety and health



Maglificio Venezia Srl strives to maintain a safe and healthy workplace, to prevent accidents and incidents resulting from the activities carried out, by spreading and consolidating a culture of safety in all departments, and promoting responsible behaviour.

11.5 Protection of individuals

Maglificio Venezia Srl protects the moral integrity of its employees, ensuring their right to dignified working conditions. No sexual harassment shall be tolerated, and any behaviour or talk that may upset individual sensibility must be avoided.

No discrimination on age, gender, sexual orientation, race, health condition, nationality, political opinion or religious belief shall be tolerated.

Under-age work is prohibited.

Maglificio Venezia Srl protects its workers against acts of psychological violence, and counters any discriminatory behaviour or attitude that may harm a person, their beliefs and their preferences.

11.6 Information management

Every employee must:

- a) be familiar with and implement the corporate policies on information security, in order to ensure its integrity, confidentiality and availability;
- b) draft their documents in a clear, objective and exhaustive way, allowing any possible checks by colleagues, supervisors or external individuals authorized by Maglificio Venezia Srl.

Maglificio Venezia Srl protects the privacy of all employees, in compliance with the Law, and adopts standards that prohibit the diffusion and disclosure of sensitive and other personal data, without the data subject's authorization, except where provided for by Law.

11.7 Freedom of association

Maglificio Venezia Srl respect and recognizes its employees' right to become a member of the trade unions they choose to, without the risk of incur penalties or discriminations of any kind.

Article 12 - Institutional relationships with Public Administrations, political parties, trade unions and associations

Maglificio Venezia Srl is committed to hold relationships with the Government or with international bodies, for the sole purpose of representing its own interests and positions, in a transparent, strict and consistent manner, while avoiding collusive behaviour.

In order to ensure the greatest clarity in its relationships, contacts with institutional interlocutors are established exclusively by the Management.

The undertaking of commitments toward the Public Administration and public institutions is reserved only to the relevant and authorized company functions, while observing current regulations and provisions, and without affecting Maglificio Venezia Srl's integrity and reputation in any way.

Maglificio Venezia Srl does not fund political parties, groups, committees and trade unions, or their representatives and candidates.

It abstains from behaviours aimed at putting direct or indirect pressure (corruption or threats) on political figures, and it does not fund any organizations with which a conflict of interest may arise.

Article 13 - Contributions and Sponsorships

Maglificio Venezia Srl can only agree to contribution requests coming from non-profit bodies and associations with a high cultural, social or charitable value, or, in any case, involving a high number of citizens.

When choosing its contributions and sponsorships, Maglificio Venezia Srl pays particular attention toward any possible personal or corporate conflict of interest (such as, by way of example, family connections with



the parties concerned, or ties with the associations that can, due to the tasks they carry out, promote Maglificio Venezia Srl's business in any way).

Moreover, it participates in the development of charitable activities in the surrounding territory, by donating economic and material resources.

Article 14 - Environmental Policies

Maglificio Venezia Srl is mindful of environmental issues and aware of the strategic role of our environment.

To this end, Maglificio Venezia Srl is committed to adopt strategies aimed at continuously improving results in the environmental protection and management field, and focus the efforts on preventing pollution and minimizing environmental risks, while complying with the following basic principles:

a) managing natural resources and energy in a sustainable manner, enhancing their use and being careful about reducing waste. This is evidenced by the investments already made for thermal and acoustic efficiency in the entire building (see roof insulation, works, door replacement, gas heating system decommissioning, activation of a new heat-pump air conditioning system powered by a photovoltaic system);

b) completing production activities through criteria that prevent pollution and contain energy consumption;

c) using suitable control tools on the main environmental impacts generated by the company's activities;

d) optimizing the quantity and quality of raw materials purchased, in order to reduce waste. One of the characteristics that distinguish knitwear from the rest of textile transformations, is the minimum scrap production. This is because shaped sheets, ready to be sawn to one another, are knitted directly from the yarn, without any cutting process that generates scrap.

The few scraps produced, alongside with unused yarns, are regularly delivered to a specialized supplier that recycles the material to produce new industrial yarns. These pre-consumer scraps, alongside post-consumer recycled raw materials and virgin fibres form the GRS yarns we buy.

Thanks to this reuse chain, we can ensure a circular economy and give new life to reject yarns.

e) ensuring respect for environmental regulations.

Article 15 - Use of company assets

All Code recipients are required to work with diligence to protect the company assets, through responsible behaviour, in line with the operating procedures arranged to govern their use, and by documenting it accurately.

In particular, every Code recipient should:

a) avoid private uses of company assets;

b) use the assets entrusted to them carefully, respecting the workplace and the tools available;

c) avoid improper use of company assets that can cause damage or reduce their efficiency, or any use in contract with Maglificio Venezia Srl's interest.

All Code recipients are also responsible for protecting the resources entrusted to them, and they must promptly notify the Management in case of threats or other events harmful to Maglificio Venezia Srl.

Article 16 - Code of Ethics Modifications, Implementation and Control. Violations and Penalties

The Code may be modified and supplemented, as necessary, by Maglificio Venezia Srl's Management. Maglificio Venezia Srl's Management is in charge of supervising compliance with the Code, and guiding compliant behaviour.

All Code recipients must notify any violations of the same to the Management. Notifications are governed by the latest whistleblowing regulation.

If the principles contained in this Code are breached, the relevant disciplinary measures will be applied, in compliance with the applicable National Collective Agreement.