

Azienda Foderami Dragoni

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CODE OF ETHICS

The Code of Ethics is the fundamental charter of moral rights and duties that defines the ethical/social responsibility of each component of the corporate organization of the Azienda Foderami Dragoni S.p.A. (hereinafter Dragoni).

It represents an effective means of preventing irresponsible or possibly illegal behavior on the part of those who work on behalf of the company by clearly and explicitly defining the responsibilities of each employee or collaborator. Its recipients are called upon to strictly and fully comply with the values and principles it contains.

Through the Code of Ethics, Dragoni intends to:

- define and explicate the values and general ethical principles in its relations with customers, suppliers, partners, employees, collaborators, administrators, public institutions and any other parties involved in the company's activities;
- formalize the commitment to behave on the basis of the ethical principles of moral legitimacy, fairness and equality, protection of the person, diligence, transparency, honesty, confidentiality, impartiality, and protection of health;
- indicate to its employees, collaborators and directors the principles of behavior, values and responsibilities in labor relations;
- define the criteria for implementation.

All recipients of this Code, whether members of corporate bodies, management, employees, external collaborators, consultants, agents, proxies, or any other person who may act in the name and on behalf of Dragoni, are required to observe and comply with its contents and inspiring principles within the scope of their specific functions, attributions and activities. The company's directors must comply with it, when proposing and implementing projects, actions and investments useful to increase in the long term the economic value of the company and the welfare of its employees, customers and suppliers; the persons in charge must take responsibility internally and externally, strengthening trust, cohesion and team spirit; the company's employees must be committed to compliance with the laws and company regulations. Each recipient of this Code of Ethics is expressly required to know its contents, actively contribute to its implementation and report any shortcomings and violations.

Dragoni undertakes to spread its Code of Ethics and to scrupulously supervise its observance, preparing adequate information, prevention and control tools. Employees and collaborators are obliged to promptly report to company management if they become aware of violations of the Code of Ethics, so that the company can promptly implement corrective actions.

Dragoni operates by respecting the fundamental rights of every individual, protecting their moral integrity and ensuring equal opportunities. Internally, Dragoni wishes to maintain a serene working environment in which everyone can work in compliance with the laws, principles and shared values; in particular, it does not tolerate any form of isolation, exploitation, harassment or discrimination.

Any form of discrimination related to diversity of origin, language, religion, political affiliation, sexual orientation, physical appearance and any other personal, social and economic condition is expressly prohibited; concessions of any privilege related to the reasons listed above are also prohibited, without prejudice to the provisions of the regulations in force.

Employees, collaborators, and business operators constitute indispensable factors for a company's success.

Dragoni protects and promotes the value of human resources in order to improve and increase the assets and competitiveness of each person's skills.

Therefore, selection, training, management, and professional development are carried out without any discrimination according to the criteria of merit, competence, and professionalism. By pursuing these principles, Dragoni ensures the protection of equal opportunities and manages career and salary advancement on these bases, ensuring transparency, seriousness, and fairness in the evaluation methods applied.

More specifically:

- the selection and evaluation of personnel are carried out on the basis of objective criteria based on the correspondence of the professional profiles and skills of the candidates with respect to the company's needs and in compliance with the equal opportunities of the candidates.
- the information taken as part of the selection process is strictly related to the verification of the professional profile sought, respecting the privacy of the candidate and his/her personal opinions.
- personnel are hired in accordance with the types of contracts provided by current legislation and national collective bargaining agreements
- assignment of positions is defined in consideration of the skills and abilities of individuals, based on the needs of the companies.

Dragoni also provides the staff with tools and opportunities for professional growth, and considers learning and training a model of permanent acquisition through which it is possible to attain knowledge, effectively understand and interpret change, acquire new ideas, improve productivity, and mature individual and overall company growth.

The corporate bodies of Dragoni, in the awareness of their responsibilities, are inspired by the principles contained in this Code of Ethics and are committed to directing their activities to values of honesty, integrity in the pursuit of corporate objectives, loyalty, fairness, respect for people and rules, and mutual cooperation.

In particular, directors make a commitment to conduct the company responsibly in pursuit of value-creation goals. Specifically, Dragoni commits itself:

- to ensure maximum spread of the Code of Ethics among employees and external collaborators;
- to provide any possible clarification regarding the interpretation and implementation of the rules of the Code of Ethics;
- to carry out checks regarding any report of violation of the rules of the Code of Ethics and, in case of ascertained violation, to take the appropriate sanctioning measures;

- to ensure the protection, safety, and health of the workplace for its staff and third parties, taking all necessary measures suggested by regulations and a path of continuous improvement.

- to protect the environment by promoting energy conservation, recycling production waste, using recycled products where possible, and complying with all relevant laws.

Dragoni established a corporate strategy dedicated to replacing products with sustainably equivalent items. More specifically, GOTS, GRS, OEKO-TEX® STANDARD 100, and FSC® certified items are included in the collection, and fibers with less environmental impact, such as BEMBERG™, MODAL®, TENCEL™, and HEMAPA, are used.

Dragoni is committed to eliminating chemicals harmful to the environment and human health from production processes and products.

Specifically, Dragoni shares the MSRL ZDHC with its suppliers whom it asks to:

- verify compliance with the MSRL ZDHC of individual chemicals used in the production processes of items destined for Dragoni,
- eliminate/replace any chemical products that do not comply with the MSRL ZDHC,
- adopt a management system to ensure that chemicals used in the production processes of articles destined for Dredgers. comply with the MRS� ZDHC,
- share the MRS� ZDHC with suppliers involved in the production of articles destined for Dragoni for their adherence.

SPECIFIC DUTIES OF HEADS OF COMPANY FUNCTIONS

Supervisors and managers must comply with the values of this Code of Ethics and set an example for their collaborators. They must establish relationships with their collaborators that are marked by mutual respect and fruitful cooperation, fostering the development of a spirit of belonging

More specifically, each area or company function manager is obligated to:

- to set an example through his or her own behavior for the employees in his or her area or company function and to direct such employees to comply with this Code of Ethics;
- work to ensure that they understand that compliance with the rules of this Code of Ethics is an essential part of the quality of work performance;
- report to company management any news provided by employees or its own findings about possible cases, even doubtful ones, of violation of the rules of the Code of Ethics.

DUTIES OF EMPLOYEES

Employees require professionalism, honesty, dedication, loyalty, spirit of cooperation, and mutual respect. More specifically, Dragoni employees should:

- refrain from conducting contrary to the rules dictated by this Code of Ethics;
- promptly report to the administration any news about possible violations;
- behave in a manner inspired by the utmost transparency, fairness, and legitimacy, performing their activities with commitment and professional rigor, acting in a manner that protects the prestige of the company. Relations among employees at all levels should be marked by the criteria and behavior of fairness, cooperation, mutual respect, and civil coexistence;
- Promote, according to their function, the dissemination of this code;

- employees are required to use the assets and tools made available by the company in a responsible manner and with utmost respect and attention, promptly reporting to those in charge of any anomalies, problems, or the possible misuse of such equipment that they believe others make of them.

It is therefore strictly forbidden for employees to act with company equipment, whether IT, technical, or any other kind, for the pursuit of private ends or interests, or in competition with company activities.

Therefore, employees are permitted to use company equipment and/or materials outside the company's facilities only in cases of use for company reasons, such as business travel to locations other than the usual one, work services under secondment, etc..

Authorization is required in all other cases.

Company work must be professional, reliable, accurate, consistent, and courteous. There must be total sharing of knowledge and a constructive environment aimed at mutual group cooperation, both internal to the group itself and open to receiving new stimuli from outside. Work must be done professionally and competently, with assiduous precision, politeness, and courtesy.

CONFLICT OF INTEREST

In order to avoid the occurrence of conflicts of interest, every transaction and activity must be undertaken solely and exclusively in the interest of the company and in a lawful, transparent and fair manner. Employees must avoid all situations and activities in which a conflict with the interests of the company may arise or which may interfere with their ability to make, in an impartial manner, decisions in the interest of the company and in full compliance with the rules of this Code of Ethics. Employees are required to avoid conflicts of interest between personal and family economic activities and the duties they hold within the structure to which they belong. Any situation that may constitute or result in a conflict of interest must be promptly reported to Management.

By way of example, but not limited to, the following determine a conflict situation:

- economic and financial interests of the employee and/or his or her family exercised in competition or conflict with those of the company;
- performance of work activities, of any kind, at customers, suppliers, competitors of the company;
- acceptance of money, favors or benefits from persons or companies that are or intend to enter into business relations with the company;

CONFIDENTIALITY

Dragoni, in compliance with Legislative Decree 196/2003 "Code on the Protection of Personal Data" protects personal data processed within the scope of its activity in order to avoid their improper or even illegal use and consequently adopts specific procedures aimed at:

- adequate information to data subjects;
- acquisition of the consent of the data subjects if necessary;
- each recipient must, moreover, conform his or her behavior to the utmost confidentiality.

The employee is required to maintain the strictest and absolute confidentiality of all information related to the company, its employees, customers, and products, protected by the confidentiality rights of which he/she is aware by virtue of his/her work activity. This is to

avoid the disclosure of confidential information pertaining to the organization, production methods, and any other information that could directly or indirectly harm the company.

In particular, personnel should:

- acquire and process only the necessary and appropriate data for purposes directly attributable to the function performed;
- store the data themselves in such a way that unauthorized others are prevented from gaining their knowledge.
- ensure that there are no constraints on the possible disclosure of information concerning third parties connected to the company by a relationship of any nature and, where appropriate, obtain their consent;
- if it is necessary for the study of prototypes or the fulfillment of orders that some data must be shared with other actors, it is necessary that the latter in turn commit themselves to the confidentiality of the information acquired.

BEHAVIOR IN PROFESSIONAL ACTIVITY AND MANNER OF OPERATION (ANTI-CORRUPTION)

The Company in all business dealings is guided by principles of loyalty, fairness, transparency, efficiency, and competition in the market.

It is not permitted to offer money or gifts to directors, officers, or employees of clients or their relatives unless the gifts are of modest value, and in no case may suggest attempts at bribery.

The same criteria must be adopted for suppliers, representatives of institutions, and collaborators in any capacity.

In any case, the type of expenditure must be specifically authorized, documented, and treated according to existing tax regulations.

Christmas gifts of modest value can be accepted by employees or managers.

Any employee who is offered or receives gifts or gratuities from third parties not attributable to normal acts of business courtesy shall immediately inform his or her supervisor or management.

RELATIONSHIPS WITH CUSTOMERS

Dragoni promotes relationships with Customers based on honesty, transparency, integrity and as the ultimate goal the highest customer satisfaction.

Employees are obligated to:

- provide high quality products and services that meet customers' reasonable expectations;
- fulfill obligations and commitments made to them;
- provide accurate, complete and truthful information;
- be consistent with advertising, commercial, or any other communication.

RELATIONSHIPS WITH SUPPLIERS

In procurement relations and, in general, in the supply of goods and/or services, employees are obliged to:

- observe internal procedures for the selection and management of relations with suppliers: value for money, punctuality of deliveries, safety and soundness of the supplier, certifications and sustainability;
- obtain the cooperation of suppliers in constantly ensuring that customer needs are met in terms of quality, cost and delivery time;
- observe and enforce contractually stipulated conditions and maintain a frank and open dialogue with suppliers in line with good business customs;
- bring problems that have arisen with suppliers to the attention of management so that the consequences can be assessed.

RELATIONS WITH THE PUBLIC ADMINISTRATION

Relations with public administration are exclusively as follows:

- instrumental in obtaining authorizations that may be necessary for the conduct of the company's business;
- assessing the implications of laws and regulations with respect to corporate activities;
- necessary in response to requests made to Dragoni by the public administration, in the performance of its institutional activity.

Relations with public administration must always be clear, transparent, and fair, such that they are not susceptible to ambiguous or misleading interpretations.

ACCOUNTING TRANSPARENCY

Dragoni, in its bookkeeping, acts in the strictest compliance with applicable laws and regulations, including regulations, relating to the preparation of financial statements and more generally to mandatory administrative - accounting documentation. The accounting records of management events, information, and corporate data provided to third parties are created according to the criteria of transparency and fairness.

Every operation and transaction must be properly recorded, authorized, verifiable, legitimate, consistent and congruous. All actions and transactions must be properly recorded, and it is possible to verify the process of decision making, authorization, and performance. Accounting transparency is based on the accuracy, completeness and authorization of basic information for the relevant accounting records. Each employee is required to cooperate to ensure that business events are represented in the accounting records in a timely manner. Adequate supporting documentation of the activity performed shall be maintained for each transaction so that the accounting records can be easily recorded, the various levels of responsibility identified, and the transaction can be accurately reconstructed, including reducing the likelihood of interpretation errors. Each record must reflect exactly what is apparent in the supporting documentation. All documentation must be promptly and systematically filed to reconstruct the relevant accounting picture at any time.

The use of corporate funds for illegal or improper purposes is prohibited. No one and for no reason shall be paid payments not based on properly authorized corporate transactions or bestowed illegal forms of remuneration. Any neglect, omission, or falsification of which employees become aware must be promptly reported to the management.

COMPLIANCE WITH INTELLECTUAL PROPERTY LAWS

Dragoni is committed to protecting its intellectual property rights and not using goods and utilities protected by the rights of others. Likewise, the Company does not violate the license agreements of others' intellectual property rights or make unauthorized use of them. In particular, it is not limited to:

- counterfeit, alter, or use trademarks or distinctive signs or patents, models, and designs owned by third parties;
- market products with false or misleading signs;
- manufacture and market goods made by usurping industrial property titles or with counterfeit or altered names, trademarks, or distinctive signs;
- disseminate, without authorization intellectual works, or parts thereof, protected by copyright.
- it is imperative not to disseminate, protect and safeguard the data, drawings, information, confidential knowledge of both Dragoni and customers that in any capacity the employee, supplier and collaborators have come to know.

If it is necessary for the study of prototypes or the fulfillment of orders that some data must be shared with other actors, it is necessary that the latter, in turn, commit themselves to the confidentiality of the information acquired.

ALCOHOL AND DRUG ABUSE

Being under the influence of alcohol or drugs can seriously impair an individual's judgment and reactions, leading to an increased risk of accidents and injuries.

The purpose of this policy is to ensure the safety of all employees, workers, and visitors by establishing clear rules regarding the use and possession of alcohol and drugs, and to support those who have reported a problem with alcohol or drug addiction.

All employees and workers will be treated consistently and fairly in line with this policy, and rules on alcohol and drugs will be strictly enforced.

Any employee, worker, or manager can or should not:

- report to work when unfit due to alcohol, drug, or substance abuse;
- be in possession of alcohol or illegal drugs in the workplace;
- provide others with alcohol or illegal drugs in the workplace;
- consume alcohol or drugs, legal or illegal and/or abuse substances while at work.

In addition, employees, workers, and contractors must:

- ensure that they are aware of the side effects of prescription drugs;
- immediately inform the Occupational Physician of any side effects of prescription drugs that could affect work performance or the health and safety of themselves or others.

Violation of these rules is a serious offense, and Dragoni will take disciplinary action for any violation.

In addition, possession or dealing with illegal drugs on Dragoni's premises is reported to the police.

SPECIAL REGULATIONS: IMPLEMENTATION AND CONTROL OF THE CODE OF ETHICS 4.1 VIOLATION OF THE CODE OF ETHICS - DISCIPLINARY MEASURES

Dragoni has so far distinguished itself by a behavior in compliance with the current regulations in all fields of application. Unethical or unlawful behavior would result in a breach of trust with serious damage to its image, reputation, and credibility. Employees and external collaborators are required to comply with this Code of Ethics in all respects.

Compliance with the provisions of this Code of Ethics is, therefore, an essential part of the contractual obligations of the employees (employees and collaborators) of Dragoni, pursuant to and for the purposes of Articles 2104 2105 and 2106 of the Civil Code. Violation of the provisions of this Code of Ethics by employees (employees and collaborators) constitutes a breach of contractual obligations and may result, depending on the case, in the application of sanctions and disciplinary measures provided for in the applicable Collective Bargaining Agreements, termination of the relationship, and compensation for damages. Dragoni will take appropriate action against those whose actions are found to be in violation of this Code of Ethics.

Dragoni, through its Legal Representative or a delegate appointed by them, undertakes to update and/or amend this Code of Ethics whenever necessary to ensure its effectiveness and alignment with business and regulatory requirements. Additionally, an annual review will be conducted to assess its adequacy and implement any changes in line with the evolution of ethical principles and corporate practices.

Gallarate, December 5, 2024

Azienda Foderami Dragoni S.p.A.

Legal Representative

MariaRosa Dragoni