



# ETHICAL CODE

Annex to the Organization and Management Model (Legislative Decree 8 June 2001, n. 231 and art. 30 of Legislative Decree 9 April 2008, n. 81)



TESSITURA ATTILIO BOTTINELLI s.r.l

DATE: 22/10/2015

REV 1: 01/06/2019

REV 2: 01/12/2024

APPROVED BY THE BOARD OF DIRECTORS

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## **1. GENERALITIES**

This document has been drafted to regulate the principles of conduct underlying the activities of every administrator, manager, employee, and/or collaborator of the Company. Its principles foster a sense of belonging, an intrinsic condition of Tessitura Attilio Bottinelli.

## **2. IMPORTANCE OF CONTINUOUS IMPROVEMENT**

The conditions of health and safety in the workplace and their ongoing improvement are fundamental ethical principles for Tessitura Attilio Bottinelli. They are applied in the daily management of the company, allowing for a drastic reduction in unwanted events (accidents, injuries, etc.) and leading to better work results.

This guarantees a healthy environment, monitored daily, with reduced risks and increased reliability and quality.

Adherence to the Ethical Code and the Organizational Model is therefore the best guarantee for a safe and healthy environment.

## **3. PRINCIPLES OF BEHAVIOR**

Below, we will review the fundamental Principles of Behavior necessary to create a positive environment characterized by passion and enthusiasm.

### **3.1. Professional commitment**

This is an essential quality for every collaborator (internal and/or external), exercised to improve over time through the fulfillment of daily tasks and continuous experience growth.

An adequate professional commitment is crucial to achieving the company's Safety and Health objectives.

### **3.2. Respect for people**

Consistency, transparency, responsibility, positivity, and teamwork are the foundations of each individual's professional and personal development, as well as the creation of a healthy environment that respects those working within Tessitura Attilio Bottinelli.

### **3.3. Integrity**

Internal and external collaborators must stand out for professionalism and dedication to their work, pursuing the collective interest of Tessitura Attilio Bottinelli rather than personal interests.

### **3.4. Loyalty**

Transparency, understood as integrity and correctness in relationships among the company's professional figures (superiors, colleagues, subordinates, external collaborators) and in compliance with the company's rules and regulations, is one of the core principles of Tessitura Attilio Bottinelli.



### **3.5. Participation**

Each collaborator, within their professional scope, must behave in a way that enhances teamwork based on mutual contributions.

The interests of Tessitura Attilio Bottinelli must take precedence over individual interests, according to each person's sense of responsibility.

## **4. PRINCIPLES OF ACTION**

Regarding the activities of all administrators, managers, and employees, Tessitura Attilio Bottinelli has also specified the principles of action.

The goal is market competitiveness through a highly qualitative offering of products, respecting legality, the environment, health, and safety at work.

Our activities are based on constant and careful evaluation of results, achieved with full transparency in accounting, administrative, and corporate responsibilities.

### **4.1. Respect for Legality**

For objectives such as quality, health, safety, and respect for the surrounding environment, Tessitura Attilio Bottinelli applies laws, regulations, and standards that are suitable for its own context.

In particular, the company ensures compliance with these laws, prohibiting the exploitation of any legislative gaps or shortcomings that could undermine adherence to the company's rules.

### **4.2. Respect for health and safety at work**

The company's policy aims to protect health, safety in the workplace, and prevent any potential risks, always with a view to continuous improvement.

This policy, applied to its employees, is also extended to employees of external companies during interventions and relationships established within the Company.

For this purpose, an implemented system exists, based on the shared and updated Risk Assessment Document, which is periodically checked and certified by third-party employees.

It also references international standards (BS OHSAS 18001), national guidelines (UNI INAIL Guidelines 2001), and the Policy for Quality, Environment, and Safety that Tessitura Attilio Bottinelli has adopted.

Every employee, collaborator, and third party must adhere to the measures required by Tessitura Attilio Bottinelli's internal procedures and regulations—within the scope of Health and Safety at work, in line with current legislation—developed with ongoing updates; each is also required to report any observations aimed at improvement (such as dysfunctions, etc.) to their direct supervisor.

### **4.3. Respect for the environment and the community**

Constantly updated on current regulations and focused on the development of scientific research and the results of best practices, Tessitura Attilio Bottinelli has always been committed to preserving the environment from potential risks; it conducts its investments and development in an eco-sustainable manner and in respect of local communities.

#### **4.4. Relationships with suppliers**

Tessitura Attilio Bottinelli seeks suppliers who share the same principles of transparency, without dependencies, and preferably aligned with environmental regulations and current legislation in this area. In addition to evaluating competitiveness, quality, technical/professional requirements, cost-effectiveness, price, integrity, and reliability of the supplier, special attention is paid to their qualities regarding health and safety in the workplace, especially concerning coordination activities.

#### **4.5. Relationships with customers**

To enhance market competitiveness, the relationship with the customer is central, managed with fairness and based on mutual trust and satisfaction.

The commitment to providing customers with a product of the highest quality, aligned with their expectations, and durable over time is guaranteed.

#### **4.6. Protection of company information**

Any information obtained from a collaborator concerning their activity is the property of Tessitura Attilio Bottinelli.

The collaborator must be aware of this and know and implement the policies regarding information security (including electronic data), to protect its integrity, confidentiality, and availability.

The Company commits to handling information with full respect for confidentiality and privacy of involved parties and in accordance with current legislation.

It has established an organization for information management that ensures proper role and responsibility distinctions; it also requires third parties involved in information handling to participate in confidentiality agreements and sign them.

#### **4.7. Protection of company assets**

Each collaborator must:

- Work diligently to safeguard company assets, both physical and intangible;
- Accurately document their use;
- Use them carefully and sparingly, avoiding improper or personal use that could damage the assets or reduce their efficiency.

. Regarding IT applications, each collaborator must also:

- Carefully adopt measures outlined in the company's security policies to avoid compromising system functionality and protection;
- Review and accept the provisions of Tessitura Attilio Bottinelli's "IT Data Management";
- Refrain from browsing inappropriate or offensive websites unrelated to their professional activity



#### **4.8. Prohibition of Alcohol and Drugs**

Tessitura Attilio Bottinelli is committed to ensuring a healthy and safe working environment for all its employees and collaborators. Therefore, the use, distribution, or possession of alcohol and drugs is strictly prohibited within the company's premises, during working hours, and in all work-related activities conducted outside the company. This policy is crucial to safeguard the health and safety of everyone, as well as to maintain a high standard of professionalism.

However, exceptions may be made by agreement with the company for special events, such as company parties or celebrations, where moderate consumption of alcohol may be authorized. In such cases, it is the responsibility of each participant to behave appropriately and ensure that consumption does not compromise the safety and well-being of others. Every employee is required to comply with this rule and report any violations to their direct supervisor. Tessitura Attilio Bottinelli reserves the right to take disciplinary action against anyone who fails to comply with this prohibition, in accordance with current laws and company policies.

### **5. VIOLATION OF THE CODE OF ETHICS AND SANCTIONS**

#### **5.1. Controls**

The Code of Ethics is a key element of the control system and is an integral part of the Organizational Model implemented by Tessitura Attilio Bottinelli in compliance with Legislative Decree 231/2001.

The laws and internal procedural provisions are ensured by an internal control system aimed at adopting tools and methods to address any business risks. The management ensures compliance with the behaviors outlined in the Code and, if necessary, implements timely and appropriate verification programs.

#### **5.2. Adherence to the Code of Ethics, Reporting Violations to the Supervisory and Control Body**

Compliance with the Code of Ethics is an essential part of the contractual obligations of employees pursuant to Article 2104 of the Civil Code.

It must also be considered an essential part of the contractual obligations undertaken by non-subordinate collaborators and/or business partners with Tessitura Attilio Bottinelli. The company's expectations towards its collaborators, through the intervention of managers and responsible persons, must be clear and effective, so that they are more easily implemented by the collaborators themselves.

Thus, managers and responsible persons ensure that the commitments expressed in the Code of Ethics are implemented.



To this end, respecting privacy and individual rights, Tessitura Attilio Bottinelli creates communication channels to facilitate the reporting of any breaches of the Code within the company to the relevant manager, in a completely confidential manner.

In case of urgency, direct reporting to the Code of Ethics responsible person is allowed via a signed letter in a sealed envelope delivered to the company, addressed to Roberto Bottinelli, or by email at: [roberto.bottinelli@tessiturabottinelli.it](mailto:roberto.bottinelli@tessiturabottinelli.it).

The company will then take appropriate action following a thorough verification, ensuring that no one within the workplace suffers retaliation, unlawful pressure, discomfort, or any form of discrimination for reporting a violation of the Code of Ethics and internal procedures.

Possible sanctions may be applied.

### **5.3. The Sanction System**

Violation of the principles of the Code of Ethics, if verified, may undermine the trust between Tessitura Attilio Bottinelli and its administrators, employees in general, consultants, collaborators of any kind, customers, and suppliers.

Disciplinary and/or sanctioning measures will be taken promptly and appropriately against those responsible for such violations (regardless of whether a criminal procedure is initiated in cases where the violations constitute a crime), to protect the company's interests and in compliance with the applicable legal framework.

Confirmed violations of the Code of Ethics, following consultation with the Supervisory and Control Body, will lead to specific actions by the Human Resources Department.

An extreme measure could be the removal of the responsible persons from Tessitura Attilio Bottinelli.

Any form of retaliation against those who have reported violations of the Code is considered a violation of the Code of Ethics.

The effects of violations of the Code of Ethics and internal protocols are valid and extendable to anyone who, in any capacity, maintains a relationship with the company.

The company will distribute the Code of Ethics and protocols, as well as inform about the sanctions for violations and the procedures for their application.

In order to protect its image and resources, the company will terminate any relationship with individuals who refuse to comply with the applicable laws and the values and principles set forth by the Code of Ethics and the related protocols.



## **6. IMPLEMENTATION OF THE CODE OF ETHICS**

The Code of Ethics will be available on the notice boards of Tessitura Attilio Bottinelli and will be delivered to its suppliers.

Collaborators who are aware of the company's confidential information must handle it with the utmost care and not disclose it—either within or outside the company—to unauthorized persons. This obligation applies both during the employment relationship and after its possible termination.