



PRINCIPLES AND POLICY ON RESPONSIBLE BUSINESS CONDUCT



TESSITURA ATTILIO BOTTINELLI s.r.l.

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I, Attilio Bottinelli, legal representative of the company *Tessitura Attilio Bottinelli S.r.l.*, with its registered office at Via Volta, 9, Villa Guardia, province of Como, Italy, guarantee the legality of the company's activities and compliance with all applicable local, national, and international laws and regulations, as well as with the criteria of the GOTS, GRS, and OEKO-TEX certification standards, should they be stricter than the law.

The company guarantees, in particular, compliance with environmental regulations, human rights, worker health and safety, as well as with the main conventions of the International Labour Organization (ILO) and the conditions outlined in national collective bargaining agreements in the relevant areas. Furthermore, it is committed to avoiding causing, contributing to, encouraging, or supporting human rights violations through its activities.

This document outlines the ethical principles the company commits to following in its operations and prescribes the responsible business practices it intends to adopt and promote with all parties involved, both directly and indirectly, in order to maintain behavior consistent with these principles.

To this end, all company personnel, from management to employees and collaborators who carry out functions for or on behalf of the company, whether or not they are direct employees, are required to review this document, align their behavior with its provisions, and act with honesty and integrity.

Where possible, the company is committed to distributing this document to its business partners, encouraging them and their subcontractors to adhere to the principles outlined within it, suggesting proper behaviors, actions to avoid, and promoting these ethical principles and practices along the entire supply chain.

Additionally, the company is committed to making this document publicly available so that all interested parties can access it.

Finally, the company is committed to providing the necessary technical, financial, and professional resources to fully achieve the objectives of this document.

1. Principles and Code of Conduct

1.1 Human and Worker Rights

The company is committed to respecting, protecting, and promoting the legislation in force regarding human and worker rights, and particularly to:

- ❖ **No forced or compulsory labor:** No worker should be forced to work under threat of penalty, intimidation, or force. Workers are free to voluntarily terminate their employment after a reasonable notice period, without having to deposit any bonds or identification documents with the employer or third parties. Workers are free to leave the workplace at the end of their shift and should not be required to pay fees or other costs for their employment or job retention. Workers are not forced to use accommodation or transportation provided by the company.
- ❖ **No child labor:** The company does not employ children below the minimum age defined by national laws for work access or compulsory schooling, and in any case, below the age of 15 (or 14 in developing countries as per ILO Convention 138). Should a child below the established minimum age be employed, the company will take all appropriate measures to remove the child from the workplace and ensure proper remediation, including active support for access to education.
- ❖ **Protection of young workers:** Young workers (under 18) are not employed during night hours or in conditions that may compromise their health, safety, or moral integrity, nor that may harm their physical, mental, spiritual, moral, or social development. Young workers do not work more than 8 hours a day or exceed the applicable national legal limits. They do not perform overtime and are entitled to at least 12 consecutive hours of rest, in addition to their regular weekly days off. Ongoing training or additional educational opportunities, such as professional or technical training, are provided.
- ❖ **No discrimination, harassment, or violence:** The company does not engage in or tolerate discrimination in employment, including recruitment, hiring, training opportunities, working conditions, job assignments, remuneration, benefits, promotions, discipline, dismissal, or retirement based on gender, gender identity, age, religion, marital status, parental status, race, caste, social background, illness, disability, pregnancy, ethnic and national origin, nationality, union membership, political affiliation, sexual orientation, or any other personal characteristic. The company fosters an environment free from harassment and violence, where all individuals are treated with respect and dignity. It encourages anonymous reporting of abuse or mistreatment, and all allegations of discrimination, violence, and harassment are taken seriously. Disciplinary measures may be applied, up to and including dismissal.
- ❖ **Gender equality:** The company offers equal opportunities to all individuals, regardless of gender, gender identity, or sexual orientation, for all aspects of professional and personal training and development. The company is committed to achieving gender equality through fair, just, and transparent recruitment, promotion, and compensation practices. The company protects pregnant women, mothers, and their children, ensuring their health and safety, and offers protection to workers with family responsibilities.

- ❖ **Freedom of association and collective bargaining:** The company does not interfere with, hinder, or prevent workers from joining or forming trade unions or worker associations of their choice and from engaging in collective bargaining. The company is committed to respecting collective bargaining agreements and allowing worker representatives access to the workplace for their duties.
- ❖ **Safe and healthy working conditions:** The company adopts adequate measures and implements systems to prevent accidents, injuries, and illnesses associated with the work activities or occurring during work, minimizing, as reasonably practicable, the causes of hazards inherent to the workplace environment. Special protection is provided for vulnerable workers such as young workers, new mothers, expectant mothers, and individuals with disabilities. The company ensures adequate protection against accidents and guarantees the stability and safety of buildings and equipment, including residential facilities where applicable.
- ❖ **Fair remuneration:** Workers are paid at least the national legal minimum standards or industry reference standards, whichever is higher. In all cases, wages should always be sufficient to meet basic needs and provide discretionary income. The company provides compensation for overtime.
- ❖ **Compliance with working hours regulations:** The company ensures that working hours comply with national laws, collective bargaining agreements, and industry reference standards, whichever offers the most protection for workers. Workers are not required to work more than 8 hours a day or 48 hours a week on a regular basis (excluding overtime), and daily and weekly rest periods are guaranteed. Overtime is voluntary, should not exceed 12 hours per week, and is not required on a regular basis.
- ❖ **No precarious employment contracts:** The company commits to establishing recognized and regular employment relationships in compliance with national legislation and international labor standards. The company refrains from using purely labor contracts, subcontracting, home-based work agreements without real intent to provide skills or regular work, excessive use of seasonal or fixed-term contracts to avoid obligations under labor laws or social security regulations.
- ❖ **Equal treatment of migrant workers:** The company does not engage in discriminatory practices towards migrant workers compared to local workers. Migrant workers' travel documents are not withheld, and they are provided with a written employment contract in a language they understand, detailing the terms and conditions of employment. If the company provides them with food, housing, transport, or other services, these are offered at a rate no higher than the market rate.
- ❖ **Equal treatment of homeworkers:** The company does not engage in discriminatory practices towards homeworkers compared to those working at the company's facility. The company ensures that homeworkers receive the same protections and benefits as those working at the company's premises.
- ❖ **Protecting minorities:** The company is committed to respecting the human rights of individuals belonging to specific groups or populations at particular risk of vulnerability, for which there is special protection, including indigenous populations, women, national or ethnic minorities, religious and linguistic minorities, children, people with disabilities, and migrant workers and their families.
The company requires all personnel to contribute to the protection of human rights by refraining from behaviors that contradict the company policy, overseeing any abuses occurring in the company, immediately stopping any behavior contrary to these rights, and adopting all necessary precautionary measures to prevent health and safety risks to themselves and others, as well as accidents within the company.



1.2 Environmental Protection (Environmental and Chemical Policy)

The company is committed to complying with current legislation for environmental protection and reducing its environmental impact, particularly:

- ❖ Monitoring and reducing energy and water consumption. The company collects data on energy and water consumption and sets and meets reduction targets. It also commits to increasing the use of renewable energy sources where possible.
- ❖ Monitoring and properly disposing of wastewater. The company collects data on wastewater produced by its activities and ensures that wastewater is treated properly before entering the water flow, in accordance with national or local laws or the chosen standard, where these are stricter.
- ❖ Monitoring air emissions. The company identifies sources of greenhouse gas emissions and collects data on these emissions to monitor them. It also commits to identifying measures to reduce emissions wherever possible.
- ❖ Monitoring and properly disposing of solid waste. The company collects data on waste produced, disposes of waste in compliance with local and national regulations, and reduces waste production, favoring reuse and recycling practices where possible. The company ensures it does not incinerate waste on-site or dispose of it in uncontrolled landfills.
- ❖ Ensuring responsible management of chemicals used in the processing of certified products. If the company uses chemical inputs in processing certified products, it commits to collecting and storing information on the safe management and use of these inputs to avoid harm to people and the environment.

The company requires all personnel to contribute to environmental protection by ensuring that its activities have the least possible impact on the environment, using resources responsibly and with attention to consumption, handling chemicals with utmost care for their safe use, and avoiding their release into the environment.

1.3 Consumer and Client Protection

The company is committed to acting in accordance with fair business, marketing, and advertising practices towards its clients and consumers, adopting reasonable measures to ensure the quality and reliability of the products and/or services offered. In particular, the company commits to ensuring that the products and/or services offered meet the requirements set by interested parties, the applicable legal requirements, and those of the GOTS standard. The company also commits to providing accurate, verifiable, and clear information about the products and/or services offered.

The company requires all employees to collaborate in producing products and/or services that align with customer expectations and comply with the relevant regulations, reporting any anomalies and refraining from providing misleading or deceptive information.



1.4 Prohibition of Bribery and Corruption

In its commercial relationships, the company refrains from engaging in illegal or collusive practices or behaviors, does not make illicit payments, and does not promote attempts at corruption or favoritism. Such behaviors damage society by distorting both the rules of fair competition and the principles that should underpin decisions, thus compromising the successful outcome of business activities and causing negative impacts on both the market and society as a whole. Furthermore, such behaviors could lead to criminal sanctions both for the company and for the personnel responsible for such actions.

The company strictly prohibits all employees from engaging in corruption within their activities and from offering, promising, paying, requesting, or receiving bribes or other undue benefits for themselves or others, either directly or indirectly, as a reward for improper actions. No form of corruption or facilitation payments to public officials to expedite routine administrative matters is permitted.

1.5 Responsible Sourcing Practices

The company is committed to preventing its contribution to negative impacts through its sourcing practices and promoting a supply chain that is considerate of human rights, labor rights, and the environment. It commits, as much as possible, to establishing stable contracts and fair supply conditions with its suppliers. The company requires its personnel, involved in the selection and management of suppliers, supplies, and in the ordering of raw materials and finished products, to adhere to the supply conditions stipulated in the contract.

1.6 Transparency of Accounting Records

The company is committed to maintaining adequate accounting and correct financial reporting, in line with current legal provisions, in order to ensure the transparency and accuracy necessary to instill trust in its activities.

To achieve this goal, the company asks all personnel involved to actively cooperate in building and maintaining the reliability of the company and its operations, keeping accurate, timely, complete, correct, and understandable accounting records, prepared with diligence and honesty. The recording of false or misleading information and data is strictly prohibited. All payments must be supported by an invoice and a contract or an order containing sufficient details to reflect the services that have been performed, and they must be recorded accurately and promptly.

1.7 Confidentiality of Personal Information

The company ensures the confidentiality of all the information in its possession and compliance with the regulations regarding the management of personal data, in order to prevent the communication or dissemination of personal data without the consent of the data subject.

The company encourages all personnel to treat with the utmost confidentiality any data, news, or confidential information that they may become aware of in the course of their work activities.



1.8 Reporting Violations (Whistle-blowing)

The company has established a mechanism for reporting violations of this document that is anonymous, non-discriminatory, and easily accessible. The company is committed to taking appropriate measures to protect individuals who submit reports from retaliation, discrimination, or penalization, and to treating any information received regarding violations of this document with the utmost seriousness, taking the necessary actions.

Reports should be sent to the following email address: tabwhistleblowing@protonmail.com

1.9 Sanction System

Behaviors that violate the principles set forth in the Code of Conduct will be subject to disciplinary sanctions in accordance with current regulations and/or the employment contract, regardless of any potential legal action against the individual responsible for such behaviors.

2. Responsible Business Conduct Policy

The commitments described in this document, which reflect the criteria of the GOTS standard, are implemented through a due diligence process that the company is committed to using in order to identify, prevent, mitigate, and account for actual and potential negative impacts on human rights, labor rights, the environment, and business ethics that its operations, supply chain, and other commercial relationships may have.

Due diligence is a proactive, dynamic, risk-based process, informed by meaningful engagement with stakeholders, appropriate to the circumstances, involving multiple processes and objectives, ensuring continuous communication, and may require prioritization based on risk. It must not lead to a discharge of responsibility.

The company commits to:

- ❖ Using due diligence in decision-making processes concerning issues related to the criteria of the GOTS standard, following these six steps:
 1. Integration of the due diligence process into its policies and management systems;
 2. Identification of actual or potential negative impacts associated with its activities through risk assessment;
 3. Development of strategies to cease, prevent, or mitigate negative impacts;
 4. Monitoring the implementation of due diligence and its outcomes;
 5. Communicating information on how impacts have been addressed;
 6. Adoption of remedial actions to address the harm;



- ❖ Exercising due diligence on the most significant risks associated with the organization's activities and supply chain, prioritizing actions based on the likelihood of the risk and the severity of the potential harm, and consulting with potentially affected stakeholders. The company requires the same commitment to due diligence on significant risks from its business partners, including suppliers, licensees, purchasing agents, logistics service providers, and other intermediaries. The company also requires its suppliers to transfer the due diligence request to their own suppliers.
- ❖ Engaging stakeholders, both internal and external, in the due diligence process in a meaningful way. This means timely, good-faith, two-way, and responsive communication;
- ❖ 4.2.1.6. The RBC Policy should include the expectations of the Certified Entity that suppliers will also conduct due diligence on significant risks in their part of the supply chain. Suppliers should be required to pass on the same or equivalent due diligence expectations to their own suppliers.
- ❖ Listening to and addressing all complaints presented through legitimate processes concerning the activities carried out by the company or any harm caused by the company or its supply chain;

Participating in or cooperating with legitimate remedy processes when the company's activities or its supply chain have caused harm to people or the environment.

The company commits to periodically reviewing and, where necessary, updating the Responsible Business Conduct Policy, and in any case, whenever it deems it necessary.