



Code of Ethics

LUSI GIOIELLI SRL

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Drafted by the Management

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Code of Ethics

This Code of Ethics has been drawn up with the aim of communicating in a transparent, clear and complete manner to all interested parties the values of LUSI SRL with regard to aspects of Social Responsibility and to disseminate these principles as widely as possible to all stakeholders.

The adoption of impeccable behaviour from an ethical point of view is what allows us to maintain and increase the heritage of trust, quality and seriousness that LUSI SRL has accumulated over the years of activity.

As a result of the globalization of markets, there is a growing need worldwide to introduce and clarify ethical and social rules in economic models that allow profit and values to coexist with the needs and interests of the subjects involved in the company's activities, not only in national and international relations but also within the company (both because the expectations and interests of the various parties involved – Shareholders, Collaborators, Suppliers, Customers, Business Partners, etc., although legitimate, may be in conflict with each other, both because in some cases there may be a risk that the effective conduct does not correspond at all to the principles promulgated).

LUSI SRL recognizes the importance of the role that ethical-social responsibility plays in the conduct of business and in the performance of corporate activities, and is committed to respecting the legitimate interests of Shareholders, Directors, Employees, Collaborators, Customers, Suppliers and Business Partners.

LUSI SRL is therefore committed to:

- maintain conduct consistent with policies on fairness, transparency, trust and collaboration in the conduct of business;
- maintain an active role in the market, economic development and technological progress with respect to the sectors in which it operates;
- pursue solid and sustainable economic, financial and social values based on the trust of customers, the motivation of employees and a responsible and constructive relationship with the territory;
- continuously improve the quality of the products and services offered to the Customer, increase customer satisfaction through effective and fair market competition, in full compliance with the laws and regulations in force;
- involve Suppliers and give them a proactive role, with particular regard to the laws and regulations governing the supply of goods and services and everything related to transparency and communication with Customers;
- promote the personal and professional development of its Collaborators and foster a sense of belonging and the desire to continuously improve efficiency and effectiveness, with the aim of increasing both corporate and personal satisfaction and well-being.

At the same time, all Employees and all those who collaborate in the conduct of the company's activities are required to comply with the rules and company directives set out in this Code of Ethics. These objectives, in fact, can only be achieved through the constant and active participation of all those involved in the company's activities and their full awareness that these objectives must be achieved in compliance with the reference values and rules of conduct clearly outlined in this document.

1. Introduction

1.1 History of LUSI SRL

Lusi Gioielli, founded by **siblings Annalisa and Giorgio Zanin** in Romano d'Ezzelino, is a testimony to innovation and renewal in the **family goldsmith tradition**, inspired by the passion of their father Lucio. For two generations, we have been dedicated to the creation of gold, diamond and precious stone jewelry, becoming a reference point for **Made in Italy craftsmanship**. Each of our jewels is a testimony of aesthetic refinement and **elegance**, following the guidelines of **simplicity and refinement**.

1.2 Company Policy

The Company Policy is a public declaration about the principles that guide LUSI SRL's commitment to quality and social responsibility and that are functional to the definition of objectives and goals for improving company performance.

Attached is the text of the **Company Policy** approved by the Management on 22.12.23. It has been designed in such a way as to ensure that:

- is appropriate for the purposes of the organization
- includes the company's commitment to comply with all the requirements of the relevant standards and all those otherwise subscribed to by the company
- understands a commitment to continuous improvement and provides a structural framework for defining and reviewing improvement objectives
- is accessible to all interested parties through posting and controlled distribution to those who request a copy
- is reviewed to ensure its continued suitability

2. Values

COMPLIANCE WITH LAWS AND REGULATIONS

LUSI SRL recognizes that compliance with applicable local laws and regulations is an absolutely essential principle. Directors, employees and collaborators who are involved in various capacities in the company's activities must therefore carry out their activities with the utmost transparency and in full compliance with the laws and regulations in force in the place where they operate. They therefore undertake to be constantly informed of all the rules and regulations applicable to their business, and the implications that may arise from possible violations. Under no circumstances can the interests of the company justify actions that do not comply with laws and regulations.

INTEGRITY

Moral integrity is a constant duty for all those who work in the name and/or on behalf of LUSI SRL. All recipients of this Code of Ethics must pursue objectives of honesty, fairness and responsibility and maintain correct conduct in compliance with rules, laws and ethics.

TRANSPARENCY AND COMPLETENESS OF INFORMATION

LUSI SRL promotes transparency in communications, formal agreements and criteria that are the basis of behaviors that allow the parties involved to make autonomous and informed choices. All recipients of this Code of Ethics must comply with the principles of truthfulness, correctness, completeness, exactness and transparency of information and must communicate the image of LUSI SRL clearly and diligently in all internal and external relations.

VALUE OF THE PERSON

LUSI SRL promotes respect for the physical, moral and cultural well-being of the person; It ensures working conditions that respect individual dignity and safe working environments. All recipients of this Code of Ethics must promote listening and dialogue as a means of continuously improving and stimulating the search for proposed solutions, not only in relations with customers but also in relations with their collaborators and colleagues, respecting the professionalism and skills of each one.

EQUAL OPPORTUNITIES

LUSI SRL undertakes to avoid any discrimination in personal conduct and to respect any differences in age, race, creed, political or trade union affiliation, language or disability. All recipients of this Code of Ethics must act taking into account the circumstances; They will not engage in discriminatory or opportunistic behaviour but will help to encourage everyone's potential.

FAIRNESS AND CONFIDENTIALITY

All situations in which the parties involved in the transactions have or appear to have a conflict of interest must be avoided.

LUSI SRL guarantees that the information in its possession remains confidential and does not acquire confidential data unless expressly and consciously authorized in accordance with current legislation. All employees may not use confidential information for purposes unrelated to their duties.

RELATIONS WITH SUPERVISORY BODIES

Relations with the supervisory bodies are based on transparency, integrity, truthfulness and correctness of information. The information that by law must be communicated to the supervisory bodies may not be hidden or falsified.

2.1 Labour practices and human rights

By implementing a Social Responsibility model, LUSI SRL has adopted a corporate culture inspired by socially correct behaviour towards workers, with particular reference to the following principles:

- Child labour
- Forced or Forced Labour
- Health and safety in the workplace
- Freedom of association and social dialogue
- Diversity, Discrimination and Harassment
- working conditions (working hours, wages, disciplinary practices)
- Human rights of stakeholders

LUSI SRL has deemed it correct to comply with these principles, not only to concretely testify to the duty to respect the human rights of workers in every type of process and organization, but also to promote them with its partners.

2.1.1 Child labour

LUSI SRL does not use or support the use of any work carried out by minors under the age of 18.

LUSI SRL therefore does not hire children or young workers, as defined, and works to protect them in the event that they turn to the facility or to complete the fulfillment of the interrupted training obligation or are looking for employment.

The company:

- ensures that no children or young workers are employed at its facility, not even accidentally
- ensure remedial actions in favour of children who have a work situation that falls within the definition of child labour to provide financial or other support to those children for attending and remaining in school until the intended age
- ensures the promotion of the education of children and young workers who are subject to local compulsory education regulations or who are attending school
- ensures that children and young workers are not exposed to situations that are dangerous, risky or harmful to their physical and mental health and development, both inside and outside the workplace

As far as apprenticeship is concerned, when used, the contractual form is used correctly, for a well-defined period of time and is subject to structured control or registration with a State Body.

2.1.2 Forced or compulsory labour

The company does not resort to or support forced or forced labor, nor has it ever done so in the past. The elements that ensure compliance with this standard are:

- the fact that staff are not required to leave cash "deposits" for any reason;
- the fact that staff are not required for any reason to leave original identity documents at the company;
- the fact that the company, or any other entity providing employment to the company, does not withhold any part of the staff's salary, benefits, property or documents used in order to force such personnel to continue working for the company;
- the fact that there are no commissions or costs related to the total or partial employment of workers;
- the fact that staff have the right to leave the workplace at the end of the standard working day, and are free to terminate the employment contract, informing the employer in a reasonable time
- the fact that neither the company nor any other entity providing employment to the company is involved in or supports human trafficking;
- the evidence of the training/information to workers by LUSI SRL on the importance of complying with the requirements inherent in compulsory work.

2.1.3 Employee health and safety

The management of LUSI SRL is aware of the importance of health and safety in the workplace and for this reason ensures a safe and healthy working environment and establishes effective measures to prevent potential accidents and injuries to the health of workers by minimizing, as far as reasonably practicable, the causes of the risk present in the work environment and taking into account the state of knowledge prevailing in the industrial sector and of each specific risk.

To do this, in accordance with Legislative Decree 81/08 (and subsequent amendments), LUSI SRL:

- implements and effectively communicates to staff its company policy (which also includes a commitment to identify, avoid or deal with potential risks to the health and safety of all personnel);
- appointed (or provided for the election) a Head of the Prevention and Protection Service (RSPP), a Competent Doctor (MC), First Aid and Fire Prevention Officers, and a Workers' Safety Representative (RLS) so that all legislative obligations on health and safety are always fulfilled;
- ensures that staff receive regular and documented safety and health training and that such training is repeated for new and redeployed staff as well as in the event of accidents, including through the provision of targeted operating instructions;
- conducted a risk analysis of workers' health and safety to identify, avoid or address potential risks to the health and safety of all personnel;
- keeps written records of all accidents that have occurred in the workplace;
- provides, at its own expense and when necessary, adequate personal protective equipment to staff;
- prepares all the necessary measures to protect workers in emergency or pandemic situations through protocols that comply with the provisions;

- in the event of an injury due to work, provides first aid and assists the worker in obtaining further medical treatment;
- undertakes to ensure, for use by all staff, access to clean rooms and bathrooms, access to drinking water and, where applicable, healthy and suitable premises for the storage of food;
- It gives all staff the right to leave work in the event of imminent serious danger without seeking the company's permission.

2.1.4 Freedom of association and social dialogue

The company recognizes that dialogue within the workplace is a fundamental point of social responsibility and ensures that all workers have the right to representation and that communication with management in matters related to Social Responsibility is facilitated. Workers may elect a Workers' Representative from among themselves for this purpose. Under no circumstances is the Workers' Representative considered a substitute for union representation. The Workers' Representative, elected and chosen by the operating staff from among its members, therefore has the authority and the task of facilitating relations with management in matters related to Social Responsibility.

LUSI SRL, within the scope of the contractual obligations undertaken:

- does not interfere in any way with the formation, operation or management of workers' organizations or collective bargaining as evidenced by the application of the CCNL referred to in individual contracts/letters of employment and makes available to its staff a copy of the CCNL and the supplementary contract in force; It also effectively informs staff about the freedom to join any organization of their choice
- ensure that staff representatives and staff involved in the organisation of workers are not subject to discrimination, harassment, intimidation or retaliation for being members of the trade union or participating in trade union activities, and ensures that such representatives have access to their members in the workplace.
- it allows workers to meet, appoint their Representative and communicate with their associates in the workplace also thanks to the facilities made available to them for any meetings/meetings.

The desire to join strikes, street demonstrations or internal committees is in no way hindered by the Management, which makes the premises available to workers for any union assemblies/meetings.

The Management of LUSI SRL does not hinder or interfere with the organizational activities of the workers and undertakes not to take any disciplinary measures against any future elected internal union representatives or workers who are members of trade unions.

2.1.5 Diversity, discrimination and harassment

LUSI SRL, with respect to race, national, territorial or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, trade union membership, political opinions, age, or any other condition that could give rise to discrimination:

- does not implement or encourage discrimination in recruitment, remuneration, access to training, promotion, dismissal or retirement; in particular, the personnel selection and recruitment processes are managed by the Management with the utmost transparency, taking into account objective

parameters in terms of education, training, skills and experience, in relation to the function to be filled. Equal treatment for all the above aspects is a principle shared within the company.

- does not interfere with the exercise of following principles or practices or meeting needs
- does not permit any behaviour that is threatening, abusive, exploitative or sexually coercive, including gestures, language and physical contact, whether in the workplace or other premises provided by the Company for use by staff

To do this LUSI SRL:

- implements and effectively communicates to staff its company policy (including a commitment to non-discrimination and acceptance of all possible differences between workers)
- gives workers the opportunity to submit reports, even anonymously, for each of which appropriate actions must be implemented
- implements transparent and non-discriminatory recruitment and selection processes
- ensures equal pay for work of equal value, non-discriminatory career advancement and access to training
- allows workers of religions other than Catholicism to be able to observe their religious holidays, upon prior request by
- in the event of maternity, it guarantees the payment of the allowances established by law and the reduction of working hours if requested
- allows compliance with the requirements related to cultural or religious practices (clothing, prayer)

2.1.6 Working conditions

In accordance with Italian legislation, applicable industry standards on working hours and (national) public holidays, the established working hours are those provided for by the CCNL.

The normal working week, excluding overtime, does not exceed 40 hours.

Staff shall be given at least one day off within a period of six consecutive working days.

In extraordinary cases, workers are required to extend their working hours.

Hours worked outside normal working hours are to be considered overtime hours, they are subject to the discipline of the same CCNL.

In cases where overtime is necessary to meet market demand for a short period of time and the company adheres to an agreement derived from freely negotiated collective bargaining with workers' organizations representing a significant part of its workforce, LUSI

SRL may request overtime in compliance with established agreements. Any such agreement must comply with the above requirements.

The final balance of the hours worked takes place through the daily recording of the hours worked by each person with possibly also the overtime hours worked.

The company favours Smart Work in the event of particular needs on the part of the worker or in situations of necessity dictated by the impossibility of going to the workplace.

The duration and frequency with which holiday periods can be requested are expressly provided for by the CCNL.

The granting of permits is subject to the provisions of the CCNL.

In accordance with Italian law, LUSI SRL:

- respects the right of staff to a living wage and ensures that the wage paid for a standard working week always corresponds to legal standards or industry minimum standards and that it is always sufficient to meet the basic needs of staff, as well as providing some discretionary gain
- does not make deductions for disciplinary purposes and in any case specifies the reasons for any deductions from the paycheck; Exceptions to this rule apply only when both of the following conditions exist:
 1. Salary deductions for disciplinary purposes are permitted by national law
 2. An agreement resulting from free collective bargaining is in place
- ensures that the composition of wages and contributory allowances is clearly and regularly detailed in writing for each pay period and clearly for the benefit of workers
- ensures that wages and pay allowances are transmitted in full compliance with applicable laws and that remuneration is paid in the manner agreed with the employee so that there are no additional costs to receive them
- does not enter into "labour-only" contractual agreements, consecutive short-term contracts, and/or false apprenticeship programmes aimed at avoiding the fulfilment of company obligations towards staff, based on current labour and social security legislation; Apprenticeship contracts are time-limited and have a clearly defined training programme
- ensures that all overtime is reimbursed with a surcharge as defined by national law

For the purpose of the correct processing of payroll, LUSI SRL has delegated to an external consulting company the determination of the amount of the emoluments in the payroll.

The company files with the Administration Office a copy of the payslips, the employment contracts duly signed by the interested parties and the evidence of the regular transfer of emoluments to the workers. The administration office and the external consulting firm are always available to workers for clarifications on the composition of the payslip.

2.1.7 Human rights of stakeholders

LUSI SRL is committed to promoting the protection of human rights in full compliance with the regulations and standards issued by relevant international organizations, including:

- the Universal Declaration of Human Rights and subsequent international conventions on civil and political rights and economic, social and cultural rights
- the United Nations Conventions on the Rights of Women, on the Elimination of All Forms of Racial Discrimination, on the Rights of the Child, on the Rights of Persons with Disabilities
- the Declaration on Fundamental Principles and Rights at Work and the eight Fundamental Conventions of the International Labour Organization

The approach adopted by LUSI SRL is aimed at protecting the rights of those belonging to its "value chain", including its own workers, suppliers and partners, migrants, children, people with disabilities, people who are victims of discrimination and any form of violence, local communities and customers.

2.2 Ethics in business management

LUSI SRL bases its business relations with its interlocutors on the principles of loyalty, fairness, transparency, efficiency and openness to the market.

The activities carried out by LUSI SRL are carried out with commitment and professional rigour, acting in such a way as to protect the prestige and reputation of the company. The company's objectives, projects, investments implemented and improvement actions undertaken, are aimed at developing the company's value and know-how in the long term as well as increasing the trust of all stakeholders in the company.

In order to spread business ethics, the company has implemented and disclosed policies on anti-corruption and bribery, conflict of interest, fraud, money laundering and anti-competitive practices.

2.2.1 Anti-corruption and anti-bribery

LUSI SRL promotes internally, in its relations with customers and suppliers, policies consistent with the laws and with the standards of legality for the prevention of corruption, bribery and transparency in business relationships. The Anti-Corruption Laws qualify as illegal for the staff of LUSI SRL, for Business Partners and for anyone who carries out activities for or on behalf of the company - the promise, offer, payment or acceptance, directly or indirectly, of money or other benefits, for the purpose of obtaining or maintaining a business and securing an unfair advantage through conduct of public and private counterparties contrary to professional duties and/or of their office.

2.2.2 Conflict of interest

Employees, members of management bodies and, in general, all those who work in the name and on behalf of LUSI SRL must avoid any possible situation of conflict of interest.

By way of example, but not limited to, situations that may result in a conflict of interest are as follows:

- participate in decisions concerning business with persons with whom the employee or a close family member of the employee has interests or from which a personal interest may arise;
- use of the company name to avail personal benefits;
- propose or accept agreements that may result in personal benefits;
- carry out acts, enter into agreements and in general engage in any conduct that may, directly or indirectly, cause damage to LUSI SRL, including in terms of image and/or credibility on the market;

If a situation arises of potential conflict with the interests of the company, the person concerned must immediately notify his or her superior or management.

2.2.3 Fraud

LUSI SRL does not tolerate fraudulent behaviour in any way, undertakes to fully comply with the environmental, social responsibility, ethical and sustainable procurement values established by the company policy and expects all persons affected by this policy to share the same attitude and commitment.

LUSI SRL promotes consistent behavior on the part of the organization through guidelines and by assigning roles and responsibilities in the prevention, detection and investigation of alleged or actual fraud against the company.

This policy aims to strengthen awareness and knowledge of the risk of fraud, and to improve the internal control system for the prevention and detection of fraud; applies to all employees, as well as consultants, suppliers, customers and any stakeholder who has relations with LUSI SRL.

Fraud is defined as any illegal and intentional act characterized by deception, concealment, or violation of the relationship of trust, committed with the aim of obtaining an unauthorized and unfair benefit and/or damaging LUSI SRL, mainly through: misappropriation of tangible and intangible assets, commercial fraud, corruption, fraudulent and untruthful representation of company facts.

Reports received of potential fraud or irregularities, as well as the identity of the whistleblower, will be treated as confidentially as possible; The Company is committed to protecting from retaliatory actions anyone who communicates suspected or actual cases of fraud.

2.2.4 Money laundering

LUSI SRL is committed to fully complying with all anti-money laundering laws in force.

To this end, each department of the company is required to obtain the necessary information and documentation on future customers, partners and employees, in order to ensure that they are exclusively involved in legal affairs and that their funds come from legal sources. The Head of Administration must identify all types of payments that are relevant to money laundering activities and follow the rules that restrict or prohibit the acceptance of such money. If an employee encounters suspicious activity that could indicate money laundering activity, they should immediately report their suspicions to the Chief Management Officer before proceeding with any other transaction.

2.2.5 Anti-competitive practices

LUSI SRL, by applying all current legislation on the subject, intends to protect competitors and customers. Since it is impossible to list all types of unfair conduct, some of them are cited by way of example:

- bribery or bribery to facilitate or disfavor agreements between third parties;
- acquiring competitors' trade secrets for the Company's benefit through bribery, theft or other unfair means;
- false, misleading or discrediting statements or comparisons against competitors, their products or services;
- making positive claims about their services without a substantiated reason.

In particular, all public statements made by LUSI SRL or on its behalf, including those relating to advertising, promotional materials, sales representations, warranties and liabilities, must at all times be truthful and have reasonable grounds based on facts, as well as not be misleading or intentionally misrepresented.

2.2.6 Information security

In compliance with current legislation, LUSI SRL undertakes to guarantee the protection of privacy regarding information regarding the private sphere and opinions of each of its employees and anyone who interacts with the company.

All employees and collaborators who act in the name and on behalf of LUSI SRL are required to process personal data as required by current laws on the protection of privacy. In particular, it is mandatory:

- obtain and use only the information that is actually necessary and directly related to the subject's location;
- respect the confidential nature of the information;
- obtain and use the information for established, explicit, and legitimate reasons;
- obtain and use relevant, accurate and complete information that does not exceed the purpose for which it was obtained and subsequently processed, ensuring that it is correctly updated;
- store this information in such a way that unrelated third parties cannot access it;
- communicate and disseminate information only as established by the procedures, subject to the authorization of the competent authorities;
- store the information in such a way that the data subjects can be identified for no longer than is necessary to achieve the purpose for which the data was collected and subsequently used.

The management, employees or collaborators in charge of the processing of personal data must take all appropriate measures to avoid any risk that the aforementioned information is destroyed or lost, even accidentally, or that the information is consulted or used without authorization or in a manner that does not comply with the scope for which it was collected; These measures are identified and periodically updated within the company.

2.3 Environmental protection

LUSI SRL identifies and assesses all the environmental risks deriving from the performance of the activity, the particularly significant impacts on the environment and the opportunities to improve the obligations inherent in environmental protection.

Checks and surveys are carried out punctually and periodically in order to minimise the identified environmental risks and significant impacts, even if for the type of production, both the risks and any impacts are not in themselves worrying.

Below is the Environmental Policy developed and shared with all employees:

LUSI SRL, in carrying out its activities, considers human health and environmental protection an indispensable duty, a continuous commitment and a constant component of its mission; The company operates by combining economic needs with those of continuous improvement of environmental performance and energy efficiency, in full compliance with the provisions of its Company Policy, mandatory standards and signed voluntary regulations.

LUSI SRL's environmental policy is drawn up, verified and approved by the Management, which ensures that:

- The context in which the company is located is analyzed in order to effectively assess the impacts it produces
- All environmental aspects/impacts produced during business processes are monitored and kept under control, within the scope of application
- Improvement programs are defined and implemented aimed at reducing significant aspects/impacts
- Compliance with current environmental and energy laws and regulations is ensured, considering them the starting point for undertaking continuous improvement
- The reduction of pollution is pursued, directly implementing and ensuring compliance at all levels of the company organization and external collaborators with the provisions of the system documentation
- The use of raw materials and control phases is optimised, perfecting the production cycle to minimise the production of waste and any other significant environmental impact
- An internal waste management method is defined and applied that allows it to be disposed of separately, the recovery of suitable fractions and the separate disposal of any hazardous waste
- The consumption of energy and water resources is constantly monitored in order to avoid, where possible, waste, working to improve the performance of structures and systems, adopting appropriate technological measures
- Training, training and awareness-raising plans for staff on the compliant management of environmental aspects and compliance obligations are defined and implemented
- The participation and collaboration of all interested parties should be encouraged in order to support and promote any initiative aimed at environmental protection

This Policy represents the guide for the continuous improvement of LUSI SRL's environmental performance and constitutes the reference framework for the definition and review of environmental objectives by the Management.

The Environmental Policy is disseminated to all staff, displayed on the company bulletin boards, and made available to all interested parties

22.12.23

THE MANAGEMENT

2.4 Supply chain management

The strategic role and the high environmental and social impact of the supply chain has prompted LUSI SRL to start a process of control of the supply chain that goes beyond the economic-commercial sphere. The need to promote a sustainable supply chain has therefore arisen, which begins with a careful selection of new suppliers and continues with a periodic review and monitoring of them and existing suppliers, to ensure compliance with the parameters defined by LUSI SRL in compliance with recognized standards.

LUSI SRL's commitment is aimed at managing a supply network that supports corporate responsibility policies, with solutions in line with both the regulatory framework and the expectations and needs of its customers and stakeholders.

LUSI SRL has communicated to its suppliers the adoption of a sustainable procurement policy, focused on aspects related to workers' rights, health and safety and the environment. In support of this, it is required to provide evidence that corroborates the answers provided.

For potential new suppliers, LUSI SRL requires, starting from the selection phase, information and documentation useful for understanding their effective commitment in the social and environmental fields.

The outcome of these in-depth studies is a pre-requisite to be included in the list of qualified and continuous suppliers.

The possession and subsequent maintenance of the required requirements are essential to be able to establish and continue a collaboration with LUSI SRL.

LUSI SRL is committed to accompanying its supply chain on a path of awareness and continuous improvement, requiring the implementation of corrective actions where necessary. For LUSI SRL, sustainable sourcing does not only mean requiring its suppliers to comply with certain procedures, standards and parameters, but it translates into a commitment to:

- collaborate with suppliers in order to maintain and improve ethical, environmental and social standards, carrying out joint assessments and visits of plants/production sites;
- focus on segments of the supply chain that have a high risk index, in terms of non-compliance with the required requirements;
- identify issues that do not meet the requirements;
- support the supplier to overcome the problems by working in such a way as to solve them promptly;
- manage relations and activities with suppliers in a fair, objective, transparent and professional manner;
- promote responsible and sustainable supply chain practices;
- communicate and train our employees on sustainable purchasing issues;
- monitor and improve LUSI SRL's practices and those of its suppliers.

3. Implementation modalities

Without prejudice to the attribution of responsibilities of each business sector, all recipients of the Code of Ethics are required to:

- actively contribute to the implementation of the Code of Ethics within the scope of its competences and functions;
- know and observe the principles and contents of the Code of Ethics in relation to the tasks performed and the functions assigned;
- comply with all internal provisions introduced by the company in order to implement the Code of Ethics or identify violations thereof;
- report any alleged violations of the Code of Ethics to the Management.

Persons who hold positions of management, responsibility or management must set an example and provide guidance in accordance with the principles contained in the Code of Ethics towards their subordinates and ensure that they are aware that the company's activities must always be conducted in compliance with the principles of the Code of Ethics.

3.1 Relations with stakeholders

The main LUSI SRL stakeholders involved in the management system are presented below:

Staff

Social responsibility towards staff is affirmed in respect of the rules and the person, in involvement, information, training and in the desire for continuous growth of everyone's skills and professionalism. The positive involvement of workers has been confirmed both from the point of view of social responsibility and environmental requirements

Suppliers

The company has structured a system of selection and qualification, monitoring and awareness of its suppliers, asking them to comply with the rules and commitments that the reference standards and the system itself require to be met.

LUSI SRL guarantees equal opportunities in the selection of suppliers, taking into account their compatibility and adequacy with respect to the company's needs. In particular, the managers in charge of selecting independent third parties such as consultants, agents, suppliers of goods, goods and services, must ensure that:

- are selected on the basis of objective evaluations and parameters (such as quality, convenience, price, capacity and efficiency, etc.) aimed at safeguarding the commercial and industrial interests of LUSI SRL, and in any case increasing its value;
- are selected on the basis of criteria of reliability and integrity, in consideration of the obligation to comply with the reference values, the rules of conduct contained in the Code of Ethics and internal procedures;
- are informed of LUSI SRL's policies and that specific contractual clauses are included regarding compliance with this Code of Ethics.

Managers must ensure that Suppliers are constantly sensitized and involved in a proactive role, that they have a responsible attitude towards transparency, communication, compliance with laws and regulations, and are aware of the social and ethical risks and opportunities that arise from their activities.

Customers

The company considers the customer as a partner with whom to work for the satisfaction not only of his needs, but also of the company's expectations, in a climate of transparency, respect for requests, including environmental ones, and trust.

In relations with public or private LUSI SRL customers:

- develops and maintains favorable and long-lasting relationships, based on maximum efficiency, collaboration and courtesy;
- operates in accordance with current regulations and requires compliance with them;
- ensures that all statements made are accurate and truthful;
- respects the commitments and obligations made to them;
- provides accurate, complete, truthful, and timely information so that the Client can make informed decisions.

Institutions

The company's attitude towards all the institutions with which it interacts is based on transparency, dialogue and collaboration.

The main institutions in the area with which there are relations are:

- Tuscany Region;
- Province of Arezzo and Province of Florence;
- Municipalities adjacent to the headquarters;
- ASL;
- Labour Inspectorate;
- Fire Brigade;
- INPS and INAIL.

Associations and NGOs

It is the intention of the company to expand its collaboration with NGOs and voluntary associations that work in the field of the protection of people's rights.

Banks

It is the company's intention to strengthen the relationship of trust with the banks in order to maintain the esteem and trust that they have always granted to LUSI SRL.

Trade unions

The company's attitude towards trade unions is based on transparency, dialogue and collaboration.

Neighbourhood and neighbouring outdoor areas

LUSI SRL is committed to complying with environmental regulations relating to any aspect, also in respect of the neighborhood. No anomalies, protests or complaints from the neighbourhood are ever reported

4. Final provisions

This Code of Ethics is approved by the Management of LUSI SRL and any modification and/or update to the Code must be submitted to the Management for approval.