

# CODE OF ETHICS

2023

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## I. Preface

### NALESSO, MORE THAN TAILORING.

#### EXCELLENCE, QUALITY AND CUSTOM-MADE APPROACH FOR A PRODUCTION PROCESS THAT GOES BEYOND TRADITIONAL MANUFACTURING.

Nalesso has been producing tailoring tradition, applying their design experience and technical research, since 1980, to create high-quality accessories, and timeless objects made to measure and designed to give shape to every project. The company, through a continuous synergy between artisan tradition and new perspectives, aims to create and distribute the typical *Made in Italy* product.

Thanks to its family roots and the productive area in which it is located, Nalesso has developed a strong tendency towards an ethical management in all areas of its business, serving customers all over the world, managing projects of every scale, from the development of the single prototype to the preparation of large spaces, from the creation of an object from scratch to the restoration or maintenance of an existing one.

Among its stakeholders, Nalesso chooses to put its human resources at the center, the beating heart of an activity that draws its strength from the creation of a handmade product of the highest level. The company also invests in training and education enriching the artisanal knowledge to support the generational transition.

Nalesso carries out its *mission* in compliance with the ethical principles of lawfulness, fairness, and transparency. With this Code of Ethics, Nalesso aims to declare the principles and rules it intends to follow in the conduction of its business activities.

For the growth of the company and all the stakeholders with whom it interacts both directly and indirectly, the BOARD OF DIRECTORS of Nalesso S.r.l. prioritizes educating on the culture of quality, respect, and protection of the environment, as well as the health and safety of its employees and partners. For these reasons, all the parties who work in or with the company, without distinction or exception, are required to observe these principles in the performance of their roles and responsibilities. In no way the conviction of acting to the advantage or in the interest of the Company can justify the adoption of behaviors in contrast with the above principles.

The president



## II. Values

### **Excellence**

The ability to always give the best in every situation and be able to provide excellent services/products/processes;

### **Responsibility**

The awareness that every choice must be made for the growth of the business environment;

### **Engagement**

Active and proactive participation in the company objectives;

### **Flexibility**

The ability to quickly adapt to changes, new contexts, and new challenges;

### **Communication**

The ability to promote and enhance sharing both within and outside the company;

### **III. General provisions**

All the Company's activities will be carried out in compliance with the law, under terms of fair competition, with honesty, integrity, fairness and good faith, and with respect for the legitimate interests of customers, employees, business and financial partners, and the communities in which the company activities take place. The pursuit of the Company's interest can never justify conduct contrary to the principles of fairness and legality.

Nalesso Srl operates in compliance with current laws, regulations, internal rules and procedures, and this Code.

The Company is committed, within its corporate organization, to distribute and educate on the knowledge of the law, the Code, and the procedures aimed at preventing their violation. Nalesso ensures the widest diffusion of the Code of Ethics to all parties involved and to the general public by promoting its internal distribution and publishing it on its website.

The Company strongly believes in the continuous improvement of its management model, it maps the internal processes and aligns them as required by the Integrated Quality, Environment, and Safety Management System, certified according to the UNI EN ISO 9001:2015, UNI EN ISO 14001:2015 and UNI ISO 45001:2018 standards.

### **IV. Protections**

#### **A-Collaborations**

Nalesso wants to provide safe and healthy working conditions and takes all necessary measures to eliminate dangers, reduce risks and prevent occupational accidents and diseases. The company implements the necessary processes to prepare for and respond to potential emergency situations. For this reason, it makes use of the following tools in its relations with its employees:

**Fairness and Equality:** Nalesso respects the fundamental rights of people, prevents discrimination based on any ground such as age, sex, health status, disability, race, nationality, political opinion, religion or belief, and social or personal conditions. Nalesso plays an active role in the employment of personnel with legally protected status, both in the company workplace and in the area in which it carries out its activities, taking part in various projects that foster the job placing of these resources.

The Company wants to promote diversity by acknowledging it as an added value that contributes to the development of different and better perspectives, it aims to implement policies to achieve an equal distribution of diversities in all departments,

both the productive and the managerial ones. It prioritizes the criterion of competence, focusing on the recognition of merits and equal opportunities to guarantee a fair payment to its employees. The Company is committed to promoting dialogue and respecting the exercise of trade union freedoms within the framework of national laws in force.

**Health and safety:** In accordance with the constitutional and legal principles that place work at the center of the Italian Republic, and that see work as a purpose that allows the personal fulfilment of the individual, and in compliance with the Charter of Human Rights, Nalesso considers the physical and moral integrity of its employees, partners, and suppliers a primary value. Safety, hygiene, and health in the workplace are protected through full compliance with current legislation on the subject. Nalesso adopts the most extensive standards in the field of occupational safety. The company complies with the criteria provided by UNI ISO 45001:2018 certification and works to identify and resolve non-conformities. Nalesso promotes safety, guarantees attendance at all compulsory courses to all employees, looks for the highest standards in training, and supports employees who, for their personal interest, decide to invest in their own education. The company provides the human resources with all the personal protective equipment required by law. The Company will not under any circumstances use forced labor, compulsory labor and child labor, not even indirectly (through suppliers or other subsidiaries or investee companies). The company is against the use of subjection techniques, threats, mobbing, and sexual harassment among employees or between managers and employees. The company fights against all violation of the law in terms of working hours.

**Organization:** Through a Risk Management policy, the Company is committed to implementing proper risk management, evaluating, deciding, and planning the necessary activities to minimize the negative impact of variability on business objectives. Nalesso manages its production cycle in compliance with ISO 9001 and organizes its work by assigning roles through a pyramid structure based on skills and merit. Nalesso protects its business activity with insurance as well as internal and external training on risks; it relies on the advice of professionals, accountants and financial and legal advisors for the development of specific skills.

## B- Customers

Nalesso pays attention to the Customer's needs to best meet their requests, to promote general business competitiveness. The company selects its suppliers according to the needs of its customers, always seeking the highest quality.

**Transparency:** Relations with stakeholders and with third parties in general must be based on good faith and reliability, to keep agreements, promises and deals. The information disclosed by the company must be complete, transparent, understandable, accurate and must respect the principles of equality and simultaneous access to it by the public. Nalesso aims to perform an efficient administration of economic resources. Each transaction must be properly recorded, authorized, verifiable and legitimate. In a manufacturing company, transparency takes form in making the production process of Nalesso branded products known to the customer, and in providing access to the production department to the competent authorities, but also to the stakeholders. The quality of the process is guaranteed also by certificates that are promptly requested from suppliers on the origin and quality of the products. Nalesso refrains from disseminating untrue or misleading information for advertising or denigrating purposes and takes care not to engage in conduct such as to take undue advantage of disadvantaged positions of third parties.

Relations with public authorities and public administrations are based on the utmost fairness, transparency, good faith, and collaboration, in full compliance with the law. Nalesso is committed to comply with applicable customs laws and regulations, including those regarding imports and the prohibition of transshipment of goods into the importing country.

**Confidentiality:** the Company will keep all information in its possession confidential and will not collect or use sensitive data, unless expressly and knowingly authorized by the data owner and in accordance with legislation in force.

The Company protects the confidentiality of its customers, employees and partners through the stipulation of NDAs (Non-Disclosure Agreements).

The Company is against the unauthorized reproduction of patents, designs and models and it safeguards intellectual property rights and originality.

Nalesso employees are trained to respect all workplaces outside the company, both private and public, in which they operate to carry out the services offered by the company, and to have the utmost respect in handling the objects that are entrusted by customers.

## C- Sustainability

The Company is committed to creating a sustainable workplace, both socially and environmentally, for its resources and for the territory.

The Company promotes respect for the environment and its protection, through the active commitment to ensure full compliance with current environmental legislation in the performance of company activities. Nalesso carries out a procedure to minimize material waste also through the implementation of management systems and takes the necessary measures to prevent environmental pollution. The company has obtained the UNI EN ISO 14001 Environmental management systems Certification. 2015

### **v. Monitoring and application**

Nalesso commits to distributing the content of its Code of Ethics inside and outside the Company and to carefully monitor compliance with the Code of Ethics and Conduct, supervising all operations and behaviors, intervening with corrective actions and appropriate sanctions, and in compliance with the sanctioning system.