

S Y L V I E Srl

Artisanal production specialized in accessories for footwear, leather goods, clothing and bijoux

28074 GHEMME (NO)

Via Novara 140 - Phone 0163/840262 - Fax 0163/841505

Iscr.Reg.Imprese-C.FISC. e P.IVA 00391390036

Web: www.sylvie.it - Info: info@sylvie.it

Social Capital i.v. € 100.000,00

ETICAL CODE

INTRODUCTION

The Code of ethics is a fundamental tool for companies in order to promote good behavioral practices for workers; it integrates laws and guides workers in daily choices to pursue the objectives that the Company sets.

It also expresses the values on which the Company is founded and that inspire the daily conduct of its activities.

Sylvie believes that it is necessary to demonstrate through actions and behaviors a belief in certain values to pursue specific objectives. This is why the code, approved by resolution of the administrative body, makes the company values and mission public, which it carries out in its daily work routine.

Acceptance of the mission and sharing of values is a necessary prerequisite for all those who intend to engage with Sylvie and must be signed at the time of entering into any relationship with it.

MISSION AND VALUES

In carrying out its activities, Sylvie is guided by the principles of transparency, loyalty, and fairness in commercial relationships.

Sylvie conceives work as a means to the realization of the personal dignity of each individual and as the first step towards achieving one's own individual happiness. Moreover, through work, the individual can contribute to the improvement of the community and therefore feel part of a larger project and participate in the construction of a common good.

Sylvie believes in **aggregation** and **sharing** as foundational values of a civil society, where individuals can feel an active part in their own and the community's development, pursuing their own goals while also contributing to the realization of those of disadvantaged people.

Sylvie, in its relationships with stakeholders, aims to be a reliable partner, capable of accurately meeting specific needs, executing the entire production cycle with professionalism and attention to detail, from the definition of the prototype to the delivery of the finished product, operating in compliance with laws and according to principles of loyalty and good faith.

RECIPIENTS

The recipients of the Code of Ethics are: employees of Sylvie, customers, suppliers, and external collaborators. All recipients are required to observe its principles within the scope of their specific activities. Each recipient is expressly required to know the content of the Code and to actively contribute to its implementation by reporting any violations.

EMPLOYEES AND COLLABORATORS

Each employee and collaborator of Sylvie commits to respecting this code by ensuring that their behavior conforms to its principles; they commit to carrying out their work with dignity, independence, and objectivity, maintaining their level of professionalism to provide customers with adequate services; they commit to avoiding any form of discrimination regarding age, race, sex, religion, nationality, opinion, and thought, and any abuse of their professional role.

The worker acknowledges the importance of Personal Protective Equipment for the protection of their health and safety and undertakes to use them in accordance with the instructions given by the employer; they also recognize that the use of alcohol and/or psychotropic substances can interfere with their work capacity and may impair its proper execution, endangering their own health and the safety of other colleagues, and undertake not to use them.

In dealings with third parties, they must behave in a transparent and collaborative manner, respecting commitments and agreements and always maintaining a behavior aimed at safeguarding the company's image and reputation. Finally, they declare themselves aware that violations of the code will be evaluated by the relevant corporate bodies

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and that it is the duty of anyone to immediately report to them any facts of which they become aware that contradict the code of ethics.

WORKING CONDITIONS

Work is carried out in safe conditions and in healthy and safe working environments, in compliance with current regulations. Adequate safety measures are adopted to protect health and prevent work accidents by reducing, as far as reasonably possible, the causes of risks related to the work environment. Workers receive periodic training and practical training necessary to carry out their duties with expertise, both at the time of first hiring and during the course of employment.

Sylvie does not employ child labor and condemns any form of irregular work. Workers' classification levels are consistent with the tasks actually performed; the salaries comply with the remuneration tables of the applicable National Collective Bargaining Agreement in the company. The working hours normally coincide with those set in the employment contract; overtime is only performed occasionally and sporadically, on special production needs, in full compliance with the applicable National Collective Bargaining Agreement, which provides for it, and is remunerated with the stipulated increases.

RELATIONSHIPS WITH CUSTOMERS AND SUPPLIERS

Each Customer and Supplier of Sylvie commits to respecting this code before establishing relationships with it. Relationships with Customers and Suppliers are based on principles of loyalty, transparency, and good faith. Sylvie presents its commercial offer to Customers preliminarily, detailing all elements, specifying products, and indicating prices transparently. Sylvie advises the Customer on the best solutions and refrains from knowingly suggesting unnecessarily burdensome, ineffective, or fraudulent ones. Sylvie does not accept illicit assignments or assignments with an illicit purpose of which it becomes aware before acceptance and interrupts those already accepted before becoming aware of them; it refrains from accepting assignments that involve a conflict of interest. In managing the assigned task, Sylvie operates with diligence and professionalism; it does not make substantial changes to agreed services that have not been previously agreed with the Customer.

Sylvie undertakes to choose its suppliers based on objective assessments of skills, competitiveness, quality, and price, in order to pursue a purchasing policy aimed at seeking the maximum competitive advantage and equal opportunities for each supplier. In the context of relations with suppliers, Sylvie is committed to establishing efficient, transparent, and collaborative relationships; it ensures that the suppliers comply with this code and, in general, act in full compliance with the law, guaranteeing the protection of their workers and the environment and operating according to the guiding principles of this Code and the most basic ethical principles.

Sylvie does not promote job offers directed at the personnel of Customers and Suppliers and carefully evaluates spontaneously received applications. No employee or collaborator should accept, for themselves or for others, commissions or compensation in money, goods, or services from suppliers that they can recommend to Sylvie's Customers.

No employee or collaborator accepts, for themselves or for others, gifts exceeding the usual modest value of gifts normally exchanged on major holidays, and in any case not exceeding the value of Euro 30.00.

CONFIDENTIALITY

Sylvie respects the right to privacy of its Customers and adopts a data protection policy in accordance with legal provisions. All employees and collaborators of Sylvie have committed, in a separate document personally signed by each of them, to absolute confidentiality and non-disclosure, even internally, regarding all data and information

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concerning the activities of Customers and/or buyers acquired during their activities. Sylvie also adopts a particularly restrictive policy on third-party access to production departments, in order to safeguard the trade secrets of its Customers during delicate production phases. Sylvie periodically reminds its employees of the importance of confidentiality and sensitizes them to careful use of social networks.

ENVIRONMENTAL PROTECTION

Sylvie carries out low-impact production activities. Nonetheless, it is constantly searching for ecological or otherwise environmentally friendly products that can be used in production; it introduces internal procedures to reduce impacts, sensitizing its employees to reduce consumption and waste, progressively digitizes documents and communications, minimizing the need for printing, thereby progressively reducing paper consumption and special waste production (toner cartridges); it encourages and facilitates the use of alternative means of transportation to automobiles for its employees; it progressively reduces the use of plastic, completely eliminating plastic bottles for water collection and adopting alternative systems for supplying drinking water.

RELATIONS WITH PUBLIC ADMINISTRATION

By Public Administration, all entities that can be qualified as such according to current legislation are meant. Relations with the Public Administration must be conducted exclusively by the company functions authorized to do so. In particular, all such relations must be guided by principles of diligence, transparency, and honesty. In dealings with governmental bodies, Sylvie maintains a behavior inspired by the highest correctness and integrity in relations with employees and representatives of public entities, political forces, and trade unions. In particular, it is not permitted to offer money or gifts to executives, officials, or employees of the Public Administration or their relatives, unless they are of nominal value. Similarly, it is forbidden to offer or accept any object, service, performance, or favor of value to obtain more favorable treatment in relation to any relationship with the Public Administration.

ADMINISTRATIVE AND ACCOUNTING MANAGEMENT

Sylvie operates in compliance with the current legal provisions and regulations applicable to the preparation of financial statements and the preparation of mandatory administrative and accounting documentation. Information must be truthful, accurate, complete, and clear to ensure transparency in accounting records, guaranteeing shareholders and third parties a clear picture of the Company's economic, patrimonial, and financial situation. To this end, the documentation of elementary facts to be recorded in the accounts must be complete, clear, truthful, accurate, and valid, and must be archived for appropriate verification. All company functions are required to provide maximum cooperation for the correct and timely representation of business management facts in the company's accounting.

VIOLATION OF THE CODE OF ETHICS – DISCIPLINARY MEASURES

Sylvie S.r.l. has distinguished itself until now for a long tradition of compliance with the current regulations for each specific sector of interest, earning credibility and appreciation from customers. Unethical or illegal behavior would result in the company breaching the trust relationship with extremely serious damage to its image, reputation, and credibility. Employees and external collaborators are required to respect this Code of Ethics in all aspects. Compliance with the rules of this Code of Ethics is therefore an essential part of the contractual obligations of the workers (employees and collaborators) of Sylvie S.r.l., pursuant to and for the effects of Articles 2104 and 2106 of the Civil Code. Violation of the provisions of this Code of Ethics by the workers (employees and collaborators) constitutes a breach of contractual obligations and may result, depending on the circumstances, in the application of sanctions and disciplinary measures provided for by the applicable Collective Agreements, termination of the

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relationship, or compensation for damages. Sylvie S.r.l. will take appropriate measures against those whose actions have been found to violate this Code of Ethics. Disciplinary measures may include, at the sole discretion of Sylvie S.r.l., verbal or written reprimand, suspension or immediate termination of the employment or business relationship, or any other disciplinary measure deemed appropriate under the circumstances. Some violations of this Code of Ethics may also be pursued civilly or criminally by administrative authorities or other authorities.

IMPLEMENTATION AND FINAL PROVISIONS

The efficiency and effectiveness of the internal monitoring system are essential for conducting business activities in accordance with the rules and principles of this Code. Therefore, all recipients of the Code are called upon to ensure its effective functioning. To this end, Sylvie undertakes to adopt procedures, provide instructions, and publish regulations aimed at ensuring the concrete observance of the rules of the Code.

CODE DISSEMINATION

The Code is distributed to all employees through posting on bulletin boards and personalized delivery. All employee must declare that they have received and understood the Code of Ethics and are informed of the consequences of non-compliance.

All individuals other than employees must provide a written declaration of acceptance of the principles contained in this Code.