



BE LUXURY ITALY S.R.L.S. (from now on only "Company") is committed to the diffusion of Made in Italy, this means products made in Italy with Italian raw materials (FOOD & BEAUTY), or products that can be made in Italy or in foreign countries, with designs Italian (FASHION category). In all cases, they are high quality products conceived and designed in Italy.

In this context, the "Company" is dedicated to finding suitable products to satisfy this commitment, with the aim of bringing quality and luxury to all customers through Made in Italy products.

The Code of Ethics is a "charter of fundamental rights and duties" through which the "Company" clarifies ethical/social responsibilities and commitments towards the various internal and external stakeholders, that is, it explains the duties and responsibilities of the "Company" towards of all stakeholders, so that they can find recognition of their expectations in it. Furthermore, it allows us to recognize unethical behavior and to indicate the correct methods of operating the company, including reference and behavioral principles, which all stakeholders must comply with.

## **1. Common provisions**

### **1.1 RECIPIENTS**

The rules of the Code of Ethics apply, without exception, to the entire "Company", to the shareholders, management, employees, external collaborators, commercial partners, suppliers and to all those who have relationships with the "Company" .

In particular, members are required to be inspired by the principles of the Code of Ethics in setting business objectives, in proposing and implementing projects, as well as in any decision or action that has an impact on values.

The "Company", at the same time as respecting the laws and regulations in force in all the countries in which it operates, strictly adheres to the principles, objectives and rules set out in the Code of Ethics and the laws of the various countries.

This commitment is required. not only to staff and management, but also to external collaborators, suppliers and all those who have relationships with the "Company".

The "Company" does not tolerate the violation of these principles, fights against material and moral corruption that can undermine the integrity of people or the Company, ensuring their observance and concrete implementation, by way of example but not limited to, with surprise inspections in partner realities.

### **1.2 RESPONSIBILITY**

The society":

- guarantee maximum dissemination of the Code among staff and third parties;
- ensures the constant updating of the Code, in relation to its concrete effectiveness and to changes in company needs and current legislation;
- guarantee every possible cognitive and clarification tool regarding the interpretation and implementation of the rules contained in the Code;
- carry out checks on stakeholders regarding correct compliance with the rules of the Code of Ethics.

### **1.3 OBLIGATIONS FOR STAFF**

All staff and management are required to have knowledge of the rules contained in the Code and of the reference standards, which regulate the activities carried out within the scope of the relevant function.

Staff also have the obligation to:

- diligently observe the rules of the Code, abstaining from behavior contrary to it;
- contact your managers if you need clarification regarding the interpretation and implementation of the rules contained in the Code;
- promptly report to their managers any information learned regarding possible violations of the Code, and any request received to violate the Code itself;
- offer maximum collaboration to ascertain possible violations.

### **1.4 VALUE OF THE CODE TOWARDS STAKEHOLDERS**

With regard to third parties, all staff and management, based on their responsibilities, will:

- give adequate information about the commitments and obligations imposed by the Code;
- demand compliance with obligations that directly concern the Company's activity;
- implement appropriate internal and external initiatives, if within its competence, in the event of failure by third parties to comply with the rules of the Code.

## **2. Ethical principles**

### **2.1 THE QUALITY OF THE PRODUCTS SUPPLIED AND THE SERVICES PROVIDED**

The "Company" orients its activity towards the satisfaction and protection of its customers, guaranteeing that the products supplied and the services provided are always of high quality and, for Made in Italy products, that everything is actually made on Italian territory with Italian raw materials.

### **2.2 QUALITY**

The "Company" ensures, at every stage of production, that the quality of these products is high, and that there are no reasons that could call into question this requirement for each individual product.

Each Stakeholder must ensure that the Code of Ethics is respected and that the products are truly of high quality, with declarations, providing exhaustive technical data sheets and allowing inspections at the production sites, even during the production itself.



### **2.3 INTEGRITY**

Integrity is an important element and is the strongest guarantee of the company's civil commitment towards all customers and all stakeholders in general.

Compliance with this principle is achieved by applying the law and respecting the rules of moral integrity in every sector of activity and in every circumstance.

The "Company" does not tolerate violations of this principle and, therefore, discourages corrupt practices in any way, including by alienating stakeholders who do not comply with the Code of Ethics.

It is therefore not permitted to pay and/or promise, directly or indirectly, money or other benefits to third parties, public officials, public service representatives or private individuals, to influence or remunerate the work of their office or, in any case, to acquire treatments please. Gestures of commercial courtesy, such as gifts or forms of hospitality, are permitted only if they are of modest value, and in any case such that they do not jeopardize the integrity and/or credit of one of the parties and/or that they cannot obtain advantages improperly.

In any case, this type of expense must always be authorized by your manager, or by one of your partners, and documented adequately. Likewise, management, employees and external collaborators are prohibited from receiving and/or requesting gifts or preferential treatment not attributable to normal courtesy relations and their manager or one of the managers must be informed of the situation, even verbally.

### **2.4 CONFLICT OF INTEREST**

All staff of the "Company" must not make decisions or carry out activities in conflict with the interests of the "Company" or incompatible with their official duties.

By way of example and not exhaustively, the following situations constitute conflicts of interest:

- economic and financial interests of staff and/or their families in the businesses of suppliers, customers and competitors;
- use of your position or information acquired in your work in a way that could create conflict between your personal interests and company interests;
- carrying out work activities of any type with customers, suppliers or competitors.

### **2.5 IMPARTIALITY**

In relations with its stakeholders, the "Company" avoids any discrimination based - for example - on age, sex, sexuality, health, race or nationality, political opinions and religious beliefs, does not take into account recommendations or suggestions of external or internal origin and ensures impartiality and fairness in compliance with the legal and contractual rules and the principles established in this Code.



## **2.6 THE OBLIGATION OF CONFIDENTIALITY**

Confidentiality is one of the fundamental values to be respected in the concrete operations of every stakeholder and/or customer. All staff, of all levels, and external collaborators are required to respect this principle even after the termination of the employment relationship.

In particular, the management, employees and external collaborators of the "Company" must guarantee the confidentiality of information, documents and data which they have become aware of during their work and which are considered to belong to the "Company", as such, they cannot be used, communicated or disseminated without specific authorization.

The obligation of confidentiality on the confidential information acquired is also imposed on the subjects with whom the "Company" has contractual or other relationships, through specific contractual clauses and/or through the request to sign confidentiality agreements.

Similarly, the "Company" undertakes to protect information relating to its staff, its customers and third parties, produced or acquired within and in business relationships, to avoid any improper use of this information and to guarantee the privacy of the interested parties. To this end, specific policies and procedures for the protection of information are applied. Third parties involved in the processing of information are required to sign specific confidentiality agreements.

## **2.7 CONDUCT IN THE WORKPLACE AND OUTSIDE**

Anyone who is part of the "Company" must always conform their conduct to company provisions and procedures in compliance with the rules established by law and the employment contract.

Managerial behaviour, in particular, must always be based on correctness and equity, as they constitute reference models for all collaborators, regardless of age, sex, sexuality, health, race or nationality, political opinions and beliefs religious.

## **2.8 INDIVIDUAL RESPONSIBILITY**

Quality is the strength of the "Company", and is the result of the action of all staff.

Everyone is responsible for the actions carried out in carrying out their work activities. Furthermore, for those who carry out managerial functions, there is also the added responsibility of supervising the activities carried out by their collaborators.

## **2.9 SOCIAL RESPONSIBILITY**

The "Company" considers its economic and social function as a priority.

This consists in the development of an offer of high quality products and in the development/dissemination of Made In Italy throughout the world, where Made in Italy means either the product made in Italy in its entirety or products made only partially, adopting a wording that allows the immediate recognition of both.

The "Company" therefore assumes the following as essential values of its action:



- THE DEVELOPMENT AND PROTECTION OF PROFESSIONALISM

The "Company" is committed to developing the skills and competences of its collaborators, pursuing a policy based on equal opportunities and merit, considering professionalism a guarantee for the entire community, and a decisive condition for achieving its objectives. Therefore, future research, selection, hiring and career development respond only to objective assessments of work quality, without any discrimination.

- SAFETY AT WORK

The "Company" undertakes to ensure the continuous improvement of workplace safety also through the definition of specific procedures and the control of their correct implementation. Technological innovation contributes significantly to increasing safety at work.

- HEALTH

The "Company" is committed to protecting the health of all staff, in every place and working condition. Health prevention and compliance with hygiene standards take place with full protection of privacy.

- RESPECT FOR THE ENVIRONMENT

The "Company" is committed to respecting the environment, limiting emissions, the use of plastics and other non-biodegradable materials as much as possible and, where possible, using recyclable and eco-sustainable materials.

- RESPONSIBILITY IN BUSINESS

The "Company" takes care of all actions, operations, negotiations and, in general, behaviors implemented in the practice of business, these must be characterized by the utmost correctness, with the exclusion of any phenomenon of corruption or favoritism, completeness and transparency of information.

The management, employees and external collaborators of the "Company" are required to provide - during negotiations - complete, transparent, comprehensible and accurate information, so that stakeholders are able to make autonomous decisions and are made aware of the interests involved, of the alternatives. The "Company" undertakes not to exploit any contractual or information and knowledge gaps, or economic weakness of its counterparties.

### **3.0 RESPECT FOR LEGALITY AND DEMOCRATIC VALUES**

The "Company" undertakes not to facilitate in any way groups, associations or individuals who pursue illicit purposes, guaranteeing instead respect for legality and the values of the democratic system.

#### **3.1 Rules and standards of conduct**

By adopting the ethical principles indicated above, the "Company" considers it a priority to base its relationships with stakeholders on the basis of the following rules.

#### **3.2 RAPPORTI CON LA CLIENTELA**

Relationships with customers must be continuously strengthened through the efficiency and quality of the service, the reliability and quality of the products, as well as through timely, precise and truthful information on the services and products offered.

The entire "Company" is obliged to:

- comply with internal procedures for managing customer relations;
- offer with efficiency and courtesy, and in compliance with contractual provisions, high quality services and products that meet or exceed customers' reasonable expectations;
- provide, with efficiency and courtesy, accurate and comprehensive information regarding the subject, price and methods of supply of products and services, so that customers can make informed decisions;
- provide truthful advertising or other communications.

The "Company" undertakes to always respond to suggestions and complaints from customers and associations protecting them, making use of suitable and timely communication systems (e-mail, telephone, websites).

#### **3.3 RELATIONSHIPS WITH SUPPLIERS**

The "Company" guarantees a relationship of real and correct competition between suppliers.

The selection of suppliers and purchases must be carried out on the basis of objective assessments regarding quality, price, punctuality in deliveries and other requirements of business necessity and utility.

The entire "Company" is obliged to:

- comply with any internal procedures for the selection and management of relationships with suppliers;
- do not hinder any supplier in possession of the required requirements from competing for the creation of products;
- include in contracts with suppliers the express obligation to comply with the principles of the Code of Ethics, indicating the termination of the contract as a sanction for any violations.

### **3.4 RELATIONSHIPS WITH EXTERNAL COLLABORATORS**

External collaborators (including consultants, intermediaries, agents, etc.) are required to comply with the principles contained in the Code of Ethics.

The staff and management of the "Company", in relation to their functions, will take care of:

- respect the internal principles and procedures for the selection and management of relationships with external collaborators;
- operate only with suitable people and companies;
- promptly inform your manager in case of uncertainties regarding possible violations of the Code of Ethics by external collaborators;
- include in external collaboration contracts the express obligation to comply with the principles of the Code, indicating the termination of the contract as a sanction for any violations.

### **3.5 HEALTH, SAFETY AND ENVIRONMENT**

The "Company" has safety and environmental protection policies as its primary values. The long-term objective is to reduce the impact on the environment to zero by using only recyclable materials.

With regard to the safety and health of workers and working environments, the "Company" is committed to encouraging all stakeholders to comply with the current legislative framework.

The entire "Company" participates in the process of risk prevention, environmental protection and health and safety protection for themselves and third parties.

### **4.0 STAKEHOLDER PROHIBITIONS**

BE LUXURY ITALY S.R.L.S. will not deal with companies, suppliers or collaborators who violate or have violated one of the following prohibitions:

- Prohibition on using minors as a workforce;
- Prohibition from testing on animals and exploiting animals for production;
- Prohibition on polluting or abandoning waste in the environment;
- Prohibition on the use of unsuitable or incorrectly contracted personnel;
- Prohibition on using raw materials that are unsuitable, of poor quality or harmful to humans;
- Prohibition on breaking health rules and laws;
- Prohibition on infringing the Italian Civil Code and/or Criminal Code;
- Prohibition on disseminating falsehoods or false information about services and/or products;
- Prohibition on disclosure of information owned by BE LUXURY ITALY S.R.L.S.;
- Prohibition of using the name or logo to send false emails to customers and suppliers;
- Prohibitions against discriminating against any individual for any reason, including but not limited to age, sex, sexuality, health, race or nationality, political opinions and religious beliefs.