

ETHIMO

OUTDOOR DECOR

CODE OF ETHICS

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FOREWORD

Since 2009, the company Whitesse srl - hereafter Whitesse - owner of the Ethimo brand, has been designing and manufacturing products for decorating outdoor spaces that reflect Italian taste, design and savoir faire.

Honesty, reliability, respect, transparency, innovation, social and environmental responsibility are the values that have always guided the work of the company and its founders, together with a deep connection to the garden world and respect for nature.

Given the geographic expansion of the business, Whitesse, while always maintaining its culture and core values, is now operating in over 70 countries and in very different and constantly evolving contexts, interacting with customers and stakeholders with the most varied characteristics and needs.

This Code of Ethics aims to establish and disseminate to all stakeholders in a clear and unequivocal manner the fundamental values of the brand, essential elements of the Company's identity and modus operandi. In this way, a shared vision and culture can be created and individual behaviours can be directed towards common objectives that respect the interests of the Company, all partners, and all the individuals with whom it relates.

The primary objective of this Code is therefore to share and disseminate the principles and values that identify the Company, ensuring that anyone called upon to make a decision while performing his or her duties acts not only in the light of his or her own interests, but also those of others, uniting the moral and managerial spheres.

1. ADDRESSEES

The business of Whitesse is not only inspired by the need to respect the laws in force, but also the principles contained herein, and hereby declares itself free not to undertake or continue any relationship with anyone who proves not to respect its contents, violating its principles and rules of conduct. The Company therefore intends to share its principles with all the interlocutors with whom it relates to achieve its purposes.

This Code therefore applies to the Board of Directors, the Independent and Statutory Auditors, all Company employees, all external collaborators (such as project workers, temporary workers, consultants, intermediaries, business partners, agents, retailers), suppliers, sub-contractors, customers and all other persons who, for various reasons and at various levels, come into contact with Whitesse or act in its name and on its behalf (hereinafter: 'Addressees').

All Addressees must actively strive to represent the Company's style of conduct: therefore, they must set an example by implementing the contents of the Code, and are responsible for ensuring that the provisions for ethical conduct and company operating procedures are adopted with reference to these principles.

In addition, the Addressees undertake to behave in a manner that complies with the provisions of the Code of Ethics, to consult their manager and/or company contact person with respect to any doubts or possible interpretations of parts of the Code of Ethics, and to report all breaches of the Code of Ethics of which they may become aware.

This Code is valid both in Italy and abroad, with the adaptations that may be necessary or appropriate due to the different realities of the countries in which Whitesse operates.

2. INTRODUCTION

2.1 OBJECTIVES

Whitessence believes in the value of work and considers legality, fairness and transparency of action to be indispensable prerequisites for achieving its economic, productive and social goals.

Whitessence's business is oriented towards strict compliance with the laws and regulations in force in all the countries in which it operates.

This Code expresses the ethical commitments and responsibilities in the conduct of the business and company activities undertaken by Whitessence collaborators (whether directors or employees in any sense of the word).

the Code of Ethics is therefore constituted by:

- the general principles on stakeholder relations, which define the reference values in Whitessence's activities in an abstract way;
- the criteria for conduct towards each class of stakeholder, which specifically provide the guidelines and standards to which Whitessence collaborators are required to adhere in order to comply with the general principles and to prevent the risk of unethical behaviour;
- implementation mechanisms, which describe the control system monitoring compliance with the Code of Ethics and its continuous improvement.

2.2 ADOPTION OF THE CODE OF ETHICS

This Code of Ethics has been adopted by Whitessence with the approval of the Legal Representative.

Through the adoption of the Code of Ethics, Whitessence sets itself rules:

- of conduct for relations with external stakeholders, collaborators, the market and the environment, parties whose compliance with these is required by Whitessence;
- of organisation and management aimed at setting up an efficient and effective system of planning, execution and monitoring of activities, such as to ensure constant compliance with the rules of conduct and prevent their breaching by any person working for the company.

2. INTRODUCTION

2.3 UNETHICAL BEHAVIOURS

In the conduct of its business, unethical behaviour compromises the relationship of trust between Whitesse and its stakeholders. The behaviour of anyone, whether an individual or an organisation, that aims to appropriate the benefits of others' cooperation by exploiting positions of strength is considered unethical and conducive to the adoption of hostile attitudes towards the company.

2.4 DISSEMINATION OF THE CODE OF ETHICS

Whitesse's Code of Ethics shall be disseminated as widely as possible and it shall be available to any of the company's stakeholders, including through its inclusion on the company's website.

all company workers are required to know and comply with the provisions of the Code of Ethics.

Whitesse carefully monitors compliance with the Code, setting up appropriate information, prevention and control tools and taking corrective actions where necessary.

this Code of Ethics may be amended and supplemented, also in the light of suggestions and indications from external bodies, by resolution of the Shareholders' Meeting.

2.5 VALIDITY AND APPLICATION OF THE CODE

the Code of Ethics applies to the entire organisation and is consequently binding on the conduct of all its employees. in addition, Whitesse requires all associated companies and major suppliers to conduct themselves in line with the general principles of this code.

2. INTRODUCTION

2.6 SUPERVISION AND ENFORCEMENT OF THE RULES

Whitessence is committed to enforcing the rules of this Code of Ethics through the establishment of an Ethics Committee appointed by the Sole Director or the Board of Directors, which it appoints to perform the tasks of supervising and monitoring:

- the application of the same by stakeholders;
- the management of any significant breaches;
- the revision and updating of the Code itself;
- the reporting of any breaches to the Sole Director or the Board of Directors.

In addition, Whitessence will set up communication channels, through specific e-mail addresses, for use by stakeholders to report any breaches.

the committee will assess the report while ensuring the confidentiality of the reporter and report any indications or suggestions to senior management, which will define the measures to be taken.

The conduct of the addressees must always be based on compliance with the values and principles contained in this Code:

- Impartiality and non-discrimination
- Honesty and fairness
- Relations with competitors
- Conflict of interests
- Confidentiality of information
- Intellectual property and the duty of confidentiality
- Centrality of the person: diversity and inclusion
- Personal integrity
- Value of human resources
- Transparency and completeness of information
- Diligence and accuracy in the execution of tasks and contracts
- Quality of services and products
- Responsibility to the community
- Environmental protection

3. GENERAL PRINCIPLES

3.1 IMPARTIALITY AND NON-DISCRIMINATION

In decisions affecting relations with its stakeholders (the choice of customers to serve, personnel management or work organisation, the selection and management of suppliers, relations with the surrounding community and the institutions that represent it), Whitesse avoids all discrimination on the basis of age, gender, sexuality, health condition, race, nationality, political opinions and religious beliefs of its stakeholders.

3.2 HONESTY AND FAIRNESS

Within the scope of their professional activity, Whitesse employees are required to diligently comply with the applicable laws, the Code of Ethics and the internal regulations. Under no circumstances may the pursuit of Whitesse's interest justify dishonest conduct.

3.3 RELATIONS WITH COMPETITORS

Whitesse undertakes to observe the national and supranational competition rules in force in the areas where it operates, and none of its employees or collaborators may engage in behaviour or initiatives aimed at unfairly affecting the market.

3.4 CONFLICT OF INTERESTS

In the conduct of any activity, situations where the persons involved in the transactions are, or may even just appear to be, in conflict of interest must always be avoided. This includes both cases where an employee pursues an interest that differs from the company's mission and the balancing of stakeholders' interests or takes 'personal' advantage of the company's business opportunities, and cases where representatives of customers or suppliers, or public institutions, act in conflict with the fiduciary duties associated with their position.

3. GENERAL PRINCIPLES

3.5 CONFIDENTIALITY OF INFORMATION

Whitessence ensures the confidentiality of the information in its possession and refrains from seeking confidential data, except in the case of express and conscious authorisation and in accordance with the legal regulations in force. Furthermore, Whitessence employees are obliged not to use confidential information for purposes not related to the performance of their duties.

3.6 INTELLECTUAL PROPERTY AND THE DUTY OF CONFIDENTIALITY

Whitessence recognises intellectual property as a fundamental asset of the Company and takes all appropriate steps to protect it.

all employees and collaborators, even after the termination of their employment, and all addressees, are obliged not to divulge information concerning the Company's technical, technological and commercial knowledge and all other non-public data and news concerning the Company, except in cases where such disclosure is required by law or by specific agreements.

In particular, ideas, models and other forms of intellectual property developed in the course of the company's business must be treated confidentially.

Whitessence also undertakes not to produce designs or products that infringe the intellectual property rights of third parties.

3.7 CENTRALITY OF THE PERSON: DIVERSITY AND INCLUSION Whitessence,

in carrying out its activities, supports and respects human rights and offers all its employees equal opportunities for growth. The Company is committed to respecting diversity and promoting inclusion, creating a motivated workforce. It does not tolerate any form of discrimination or exclusion based on age, culture, ethnicity, nationality, religion, political opinion, marital status, sexual orientation, health or disability.

3. GENERAL PRINCIPLES

3.8 PERSONAL INTEGRITY

Whitessence employees are a resource and an indispensable factor for success in the market. Whitessence intends to develop the value of each person by respecting and guaranteeing their physical, cultural and moral integrity. It ensures working conditions which respect individual dignity and a safe and healthy working environment.

In particular, the Company undertakes to:

- prevent any form of health risk or hazard;
- implement preventive actions for collective protection first, and then for individual protection;
- provide workers with the necessary means and information to prevent all types of risk.

The workers, for their part, shall be obliged to:

- act in accordance with the prevention of risks or dangers to themselves or others;
- contribute through their behaviour to the fulfilment of all necessary health and safety behaviours; observe behavioural safety regulations;
- always use equipment and protective equipment correctly, participate in training and instruction programmes.

3.9 VALUE OF HUMAN RESOURCES

Whitessence protects and promotes the value of human resources in order to improve and increase the wealth and competitiveness of the skills possessed by each employee.

all staff are employed by Whitessence under regular employment contracts.

the employment relationship is conducted in accordance with the collective bargaining regulations of the sector and the social security, tax and insurance regulations.

The Company contributes to the training and professional growth of its employees and collaborators by ensuring each worker learns about their colleagues' respective work experiences and through other training measures that enhance their own professionalism.

3. GENERAL PRINCIPLES

Every employee and collaborator must contribute to creating a stimulating and rewarding working environment.

Selection, recruitment, grading, training and remuneration are exclusively based on objective considerations of the professional and personal characteristics required to perform the job to be done, without any form of discrimination on grounds of age, culture, ethnicity, nationality, religion, political opinion, marital status, sexual orientation, health or disability.

3.10 TRANSPARENCY AND COMPLETENESS OF INFORMATION

Whitessence collaborators are required to provide complete, transparent, comprehensible and accurate information, so that, when establishing relations with Whitessence, the stakeholders are able to make autonomous decisions in full knowledge of the interests involved, the alternatives and the relevant consequences. In particular, when formulating any contracts, Whitessence takes care to specify to the contracting party the conduct to be adopted in all the circumstances envisaged, in a clear and comprehensible manner.

3.11 DILIGENCE AND ACCURACY IN THE EXECUTION OF TASKS AND CONTRACTS

Contracts and work assignments must be performed as responsibly agreed upon by the parties. Whitessence undertakes not to take advantage of conditions of ignorance or incapacity of its counterparts. In existing relationships, efforts must be made to ensure that anyone acting in the name and on behalf of Whitessence attempts to take advantage of contractual shortcomings, or unforeseen events to renegotiate the contract for the sole purpose of exploiting the position of dependence or weakness in which the counterparty has found itself.

3. GENERAL PRINCIPLES

3.12 QUALITY OF SERVICES AND PRODUCTS

Whitessence orients its activities towards the satisfaction and protection of its customers by listening to requests that can help improve the quality of its products and services.

3.13 RESPONSIBILITY TO THE COMMUNITY

Whitessence is aware of the direct and indirect influences that its activities can have on the conditions, economic and social development and general wellbeing of the community, as well as the importance of the social acceptance of the communities in which it operates. For this reason, Whitessence intends to conduct its investments with respect for the local and national communities, and to support initiatives of cultural and social value in order to achieve an improvement in its reputation and social acceptance.

3.14 ENVIRONMENTAL PROTECTION

The environment is a primary asset that Whitessence is committed to safeguarding; to this end, it plans its activities by seeking a balance between economic initiatives and unavoidable environmental needs, taking into consideration the rights of future generations. Whitessence therefore undertakes to improve the impact of its activities on the environment and the landscape, as well as to prevent risks to the population and the environment not only in compliance with the regulations in force, but also taking into account the development of scientific research and the best experiences on the subject.

Whitessence's production activities are managed in full compliance with current environmental regulations.

4. RULES OF CONDUCT

4.1 RELATIONS WITH EXTERNAL STAKEHOLDERS

Whitessence's relations with any interlocutor, public or private, must be conducted in accordance with the law and in compliance with the principles of fairness, transparency and verifiability.

Any form of gift that may even appear to exceed normal business practices or courtesy is prohibited, as are any others offered with the aim of acquiring favourable treatment in the conduct of any business.

With regard to representatives or employees of public administrations, it is forbidden to seek and establish personal relationships of favour, influence, interference, capable of directly or indirectly influencing the outcome of the relationship; it is also forbidden to offer goods or other benefits to representatives, officials or employees of public administrations, even through intermediaries, unless these are gifts of modest value and in line with customary practice and provided that they cannot be understood as aimed at seeking undue favours.

Whitessence does not provide contributions, advantages or other benefits to political parties and workers' trade union organisations, or to their representatives, except in compliance with the applicable legislation.

4.2 RELATIONS WITH CUSTOMERS AND PRINCIPALS

Whitessence bases its activities on the criterion of quality, essentially understood as the objective of full customer satisfaction.

In its relations with customers and clients, Whitessence ensures fairness and clarity in commercial negotiations and in the undertaking of contractual obligations, as well as faithful and diligent contractual fulfilment.

All offers will be formulated in a way that ensures compliance with adequate quality standards and safety measures, as well as appropriate salary levels for employees.

Whitessence only resorts to litigation when its legitimate claims are not fairly resolved.

In the conduct of any negotiations, situations in which the persons involved in the transactions are or may appear to be in conflict of interest must always be avoided.

4. RULES OF CONDUCT

4.3 SUPPLIER RELATIONS

Whitessence's relations with suppliers, including financial and consultancy contracts, are governed by the rules of this Code and are subject to constant and careful monitoring by the Company.

Whitessence uses suppliers, consultants and partners who operate in accordance with the regulations in force and the rules set out in this Code.

4.4 EXTERNAL COMMUNICATION

Whitessence's communication with its stakeholders (including through the media) is based on respect for the right to information; under no circumstances may false or biased news or comments be disseminated.

All communication activities comply with the laws, rules and practices of professional conduct, and are carried out with clarity, transparency and timeliness, safeguarding, among others, price-sensitive information and trade secrets. Any form of pressure or acquisition of favourable attitudes by the media is avoided.

5. CRITERIA OF CONDUCT AND RELATIONS WITH COLLABORATORS

5.1 DUTIES OF COLLABORATORS

The employee must act loyally in order to comply with the obligations entered into in the employment contract, and with the provisions of the Code of Ethics, ensuring the required performance.

5.2 INFORMATION MANAGEMENT

The employee need to be familiar with and implement the provisions of the company's information security policies to ensure its integrity, confidentiality and availability. They are required to draft their documents using clear, objective and exhaustive language, allowing for any checks to be carried out by colleagues, managers or external parties authorised to request these.

5.3 CONFLICT OF INTERESTS

All Whiterence employees are required to avoid situations where conflicts of interest may arise and to refrain from taking personal advantage of business opportunities of which they have become aware in the course of their duties.

5.4 USE OF COMPANY ASSETS

Each employee is required to work diligently to protect the company's assets, through responsible conduct and in line with the operating procedures drawn up to regulate their use, and accurately documenting their use. In particular, each employee shall: use the assets entrusted to him or her scrupulously and sparingly;

- avoid improper use of company assets that may cause damage or reduce efficiency, or otherwise be contrary to the company's interests;
- respect and maintain an intact working environment with respect for the workplace and for their colleagues.

5. CRITERIA OF CONDUCT AND RELATIONS WITH COLLABORATORS

Each employee is responsible for the protection of the resources entrusted to him/her and has the duty to promptly inform the units in charge of any threats or events detrimental to the company.

Whitessence reserves the right to prevent the misuse of its assets and infrastructure through the use of accounting, reporting, financial control, risk analysis and prevention systems, subject to compliance with the provisions of the laws in force (privacy law, workers' statute, etc.).

With regard to computer applications, each employee is required to:
scrupulously adopt the provisions of the company's security policies so as not to compromise the functionality and protection of information systems;
not send threatening and insulting e-mail messages, not use low-level language, not make inappropriate comments that may cause offence to people and/or damage the company image;
not surf websites with indecorous and offensive content.

6. CUSTOMER RELATIONS

6.1 IMPARTIALITY

Whitessence undertakes not to discriminate arbitrarily against its customers.

6.2 CONTRACTS AND COMMUNICATIONS TO CUSTOMERS

Whitessence's contracts and its communications to customers (including advertisements) are:

- clear and simple, formulated in a language as close as possible to that normally used by interlocutors;
- compliant with applicable regulations, without resorting to elusive or otherwise unfair practices;
- complete, so that no element that is significant for the client's decision is overlooked. The purposes and recipients of the communications shall determine, on a case-by-case basis, the choice of the most suitable contact channels for the transmission of the contents without resorting to excessive pressure and solicitation, and undertaking not to use misleading or untruthful advertising tools.

Finally, it is the responsibility of Whitessence to communicate in a timely manner all information related to:

- any amendments to the contract;
- any changes in the economic and technical conditions for the provision of the service and/or sale of the products/services;
- results of audits carried out in compliance with the standards required by the control authorities.

6.3 COLLABORATOR'S STYLE OF BEHAVIOUR

Whitessence's style of behaviour towards its customers is characterised by helpfulness, respect and courtesy, with a view to a collaborative and highly professional relationship. Furthermore, Whitessence is committed to limiting the obligations required of its customers and to adopting simplified, secure and, where possible, computerised payment procedures that are free of charge.

6. CUSTOMER RELATIONS

6.4 QUALITY CONTROL AND CUSTOMER SATISFACTION MONITORING

Whitessence is committed to ensuring adequate quality standards of the services and/or products offered on the basis of pre-defined levels and to periodically monitoring their perceived quality.

7. SUPPLIER RELATIONS

7.1 CHOICE OF SUPPLIER

The purchasing processes are geared towards seeking the maximum competitive advantage for Whitesse, on offering equal opportunities for each supplier, and on fairness and impartiality.

For Whitesse, the following are benchmark requirements:

- the suitably documented availability of means, including financial means, organisational structures, project capacities and resources, know-how, etc;
- the existence and effective implementation, where Whitesse specifications so provide, of adequate company management systems (e.g. iSo 9001; iSo 14001; SA8000; iSo 45001; Legislative Decree 231);
- where the supply includes know-how or rights of third parties, the obtaining by the supplier of a significant share of added value.

7.2 INTEGRITY AND INDEPENDENCE IN RELATIONSHIPS

Relations with suppliers are governed by common principles and are constantly monitored.

These relations also include financial and consultancy contracts.

The stipulation of a contract with a supplier must always be based on very clear relations, avoiding forms of dependency wherever possible.

7.3 PROTECTION OF THE ETHICAL ASPECTS OF SUPPLIES

With a view to bringing procurement activities into line with the ethical principles adopted, Whitesse undertakes to introduce, for particular supplies, social requirements (e.g. the presence of a SA8000 or Quality/Safety/ Environment Management system).

Breaches of the general principles of the Code of Ethics entail sanctioning mechanisms also aimed at preventing crimes against the public administration or environmental disasters attributable to Whitesse activities. To this end, special clauses are included in the individual contracts stipulated.

In particular, the contracts stipulated with suppliers 'at risk', introduce contractual clauses that envisage:

7. SUPPLIER RELATIONS

- self-certification by the supplier of their compliance with specific social obligations (e.g. measures that guarantee workers respect for fundamental rights, principles of equal treatment and non-discrimination, protection from child labour);
- the possibility of adopting control actions at the production units or operating sites of the supplier company in order to verify the fulfilment of these requirements.

8. WAYS OF IMPLEMENTING THE CODE OF ETHICS

8.1 DUTIES OF THE ETHICS COMMITTEE FOR THE IMPLEMENTATION AND MONITORING OF THE CODE OF ETHICS

The Ethics Committee has the following tasks:

- make decisions on significant breaches of the Code reported by the Head of the Whiteness Audit function.
- express binding opinions on the revision of the most relevant policies and procedures in order to ensure their consistency with the Code of Ethics;
- provide for the periodic review of the Code of Ethics. To this end, the Committee assesses:
 - ethical communication and training plans;
 - the social balance sheet;
 - the work plan prepared by the Head of the Whiteness Audit function and its periodic reports.

8.2 TASKS OF THE WHITENESS AUDIT FUNCTION

The following tasks are assigned to the Head of the Whiteness Audit function:

- verifying the application of and compliance with the Code of Ethics through technical auditing, which consists of ascertaining, the ethical risks in the area of Whiteness by analysing and evaluating the control processes in place;
- monitoring the initiatives carried out to raise awareness and understanding of the Code of Ethics; in particular: ensuring the development of ethical communication and training activities; analysing proposed revisions of corporate policies and procedures with significant impacts on corporate ethics and preparing hypothetical solutions for consideration by the ethics committee;
- receiving and analysing reports of breaches of the Code of Ethics;
- proposing amendments and additions to the Code of Ethics to the Ethics Committee.

These activities are carried out with the support of the Audit and Internal Control function and the relevant corporate functions and, in addition, with free access to all documentation deemed useful.

8. WAYS OF IMPLEMENTING THE CODE OF ETHICS

8.3 COMMUNICATION AND TRAINING

The Code of Ethics is brought to the attention of internal and external stakeholders through appropriate communication activities.

In order to ensure the correct understanding of the Code of Ethics for all employees, the HR department prepares and implements, also based on the indications of the Head of the Whitesence Audit department, an annual training plan aimed at fostering awareness of the principles and ethical standards. The training initiatives are differentiated according to the role and responsibility of the collaborators; for new recruits, a special training programme is envisaged that illustrates the contents of the Code, compliance with which is required.

8.4 STAKEHOLDER REPORTS

For each stakeholder, Whitesence establishes communication channels to which they can address their complaints (e.g. units responsible for relations with suppliers, staff, call centres for customers, etc.).

Alternatively, all Whitesence stakeholders may report, in writing and non-anonymously, any breach or suspected breach of the Code of Ethics to the Whitesence Audit function (SB), which will analyse the report, hear from the author, if required, and from the person responsible for the alleged breach.

The Whitesence Audit function acts in such a way as to guarantee whistleblowers against any kind of retaliation intended as an act that could give rise even to the mere suspicion of being a form of discrimination or penalisation (e.g. for suppliers: interruption of business relations, for employees: failure to receive promotion, etc.). The confidentiality of the whistleblower's identity is also ensured, without prejudice to legal obligations.

8.5 BREACHES OF THE CODE OF ETHICS

The Whitesence Audit function reports breaches of the Code of Ethics, which have come to light as a result of stakeholder reports or technical auditing activities, and makes the suggestions it deems necessary:

8. WAYS OF IMPLEMENTING THE CODE OF ETHICS

- in the most significant cases, to the Ethics Committee, which, following an appropriate analysis, informs the Sole Director/CEO of Whitesse or the Board of Directors, as the case may be, of the breaches and the consequent measures;
- in other cases, directly to the company's Sole Director / CEO, providing the Director and the ethics committee with a summary report.

The competent company departments, activated by the relevant Company Director, define the measures, ensure their implementation, and report the outcome to the Head of the Whitesse Audit Function (SB).

8.6 PREVENTION

In compliance with the regulations in force and with a view to planning and managing company activities inspired by efficiency, fairness, transparency and quality, Whitesse adopts organisational and management measures suitable for preventing unlawful behaviour or behaviour in any case contrary to the rules of this Code on the part of any person acting for the company.

8.7 CONTROLS

Whitesse adopts specific procedures to monitor the conformity of the conduct of anyone who acts for the company or within its sphere with the provisions of the regulations in force and the rules of conduct of this Code.

8.8 SANCTIONS

Whitesse employees must consider compliance with the provisions of the Code as an essential part of their contractual obligations under Art. 2104 of the Civil Code. Breaches of the provisions of the Code by employees may constitute a breach of the primary obligations of the employment relationship or a disciplinary offence, with all legal consequences.

9. APPROVAL OF THE CODE OF ETHICS

APPROVED

VITORCHIANO, 06/02/2023

The Director

ETHIMO

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