

CODE OF ETHICS AND CONDUCT

1. INTRODUCTION

The Code of Ethics and Conduct (hereinafter the "Code") is a document approved by CERTOTTICA that contains the principles of conduct and the commitments that the Institute and its staff undertake both towards the Institute itself and towards third parties.

The purpose of the Code is to reaffirm to all directors and corporate staff of the Institute the commitment to maintain ethical behaviour in all circumstances, and in particular to:

- comply with the laws in force in each country in which the Institute operates;
- operating with fairness and courtesy in relations between colleagues;
- respect the interests of all other stakeholders (customers, consumers, institutions, public authorities and the external community);
- perform their role with professionalism and moral integrity.

The rules of the Code shall apply, without exception, to all directors and company personnel who have employment relationships with CERTOTTICA, in Italy and in all other countries in which the Institute operates.

The term 'company personnel' includes:

- employees
- the members of the impartiality committee
- all other collaborators (external consultant) and assessors (auditors/inspectors).

Company directors and staff are therefore required to read it, to be familiar with its contents, to accept it and to conduct themselves in accordance with its principles.

Company personnel are also required to report any violations of the Code to the appropriate bodies.

Compliance with the rules of the Code shall be considered an essential part of the contractual obligations of company staff and persons who have business relations with CERTOTTICA.

CERTOTTICA management is responsible for making this Code known, explaining it and ensuring that it is understood by all company staff.

Violation of the principles laid down in the Code of Ethics and Conduct and in company procedures compromises the relationship of trust between CERTOTTICA and whoever commits the violation (directors, company staff, customers, suppliers).

Violations, once ascertained, will be promptly prosecuted, through the adoption of appropriate and proportionate disciplinary measures, in line with the provisions of the current legal framework, regardless of the possible criminal relevance of such conduct and the institution of criminal proceedings in cases where they constitute a crime. Disciplinary measures for violations of this Code are taken by the Institute in line with the laws in force and the relevant national labour contracts.

This Code is approved by the Management and brought to the attention of company staff and any third party who may act on behalf of the Institute.

All the aforementioned subjects are obliged to learn and comply with its contents.

A copy of this document is sent to all company personnel (including on-duty assessors/inspectors) who are required to sign it for acceptance.

2. CODE ETHICS AND CONDUCT

2.1 FOREWORD on the certification process

CERTOTTICA and all areas and offices within it, as well as entities under its organisational control, undertake to guarantee the requirement of independence and third party status by ensuring that

- not be the designer, manufacturer, installer, distributor or maintainer of the certified product;
- not offer or provide advice to customers to whom the product certification service is provided.

Furthermore, CERTOTTICA requires all personnel involved in the certification process to sign this document for full approval, thereby ensuring that they

- comply with the rules defined by CERTOTTICA, including those relating to confidentiality and independence from commercial and other interests;
- declare any previous and/or current collaboration with a supplier or product designer, promptly reporting any assignments or evaluations assigned by CERTOTTICA that may be incompatible;
- disclose any situation of which it is aware that could present itself or CERTOTTICA as having a conflict of interest.

2.2 CONFLICT OF INTEREST

In the performance of their work, company staff shall avoid any possible conflict of interest, with particular reference to personal and/or family interests that could influence the independence of their judgement and conflict with their responsibilities towards CERTOTTICA.

Company staff must immediately report any situation that constitutes or may generate a conflict of interest to their hierarchical superior and/or the Institute's top management.

In particular, company personnel shall disclose the existence of a stable or temporary employment relationship, or a financial, business, professional, family relationship with entities external to CERTOTTICA that may affect the impartiality of their conduct or prejudice the propriety of their activities.

2.3 RELATIONS WITH CUSTOMERS

CERTOTTICA pursues its success as a company in the markets by offering quality services at competitive conditions and in compliance with all rules set to protect fair competition.

CERTOTTICA recognises that the appreciation of applicants for products or services is paramount to its success as a business. CERTOTTICA employees are required to:

- observe internal procedures for managing customer relations;
- efficiently and courteously provide, within the limits of the contractual provisions, high quality products that meet or exceed the customer's reasonable expectations and needs;
- provide accurate and comprehensive information about products and services so that customers can make informed decisions;
- adhere to the truth in advertising or other communications.

2.4 RELATIONS WITH SUPPLIERS

In contracting, procurement and, in general, the supply of goods and/or services, CERTOTTICA employees are obliged to

- observe internal procedures for selecting and managing relations with suppliers;
- not preclude any supplier company meeting the requirements from competing for the award of a supply contract, adopting objective evaluation criteria in the selection, in a declared and transparent manner;

- obtain the cooperation of suppliers in constantly ensuring that the needs of CERTOTTICA customers are met in terms of quality, cost and delivery times to an extent at least equal to their expectations;
- observe the contractual terms and conditions;
- maintain a frank and open dialogue with suppliers, in line with good business practice;
- bring relevant problems that have arisen with a supplier to the attention of CERTOTTICA Management, so that the consequences can be assessed at company level.

2.5 GIFTS, FREE GIFTS AND BENEFITS

It is not permitted to offer or receive any form of gift or benefit that may be interpreted as exceeding normal business practices and courtesy, or that may be intended as a means of acquiring favourable treatment in the performance of work activities.

2.6 PERSONNEL POLICIES

2.6.1 HUMAN RESOURCES

Human resources are an indispensable element for the existence of the company.

The dedication and professionalism of employees are decisive values and conditions for achieving CERTOTTICA's goals.

CERTOTTICA is committed to developing the skills and competences of each employee so that the energy and creativity of individuals finds full expression in realising their potential.

CERTOTTICA provides all employees with equal employment opportunities, ensuring that everyone enjoys fair treatment based on merit, without any discrimination. The relevant functions shall:

- adopt merit, competence and otherwise strictly professional criteria for any decision concerning an employee;
- provide for the selection, recruitment, training, remuneration and management of employees without any discrimination;
- create a working environment in which personal characteristics cannot give rise to discrimination.

CERTOTTICA interprets its entrepreneurial role both in the protection of working conditions and in the protection of the psycho-physical integrity of workers, respecting their moral personality, preventing

them from being subjected to unlawful conditioning or undue discomfort. To this end, even behaviour outside work that is particularly offensive to civil sensibilities and that makes interpersonal contacts in the work environment reasonably distressing will be considered relevant.

CERTOTTICA expects employees at all levels to cooperate in maintaining a climate of mutual respect for each other's dignity, honour and reputation. CERTOTTICA shall take action to prevent insulting or defamatory interpersonal behaviour.

The company opposes all forms of discrimination, forced labour and child labour. It does not discriminate on the basis of gender, age, socio-economic status, ethnicity, religion or sexual orientation.

2.6.2 HARASSMENT IN THE WORKPLACE

CERTOTTICA requires that no harassment, understood as such, takes place in internal and external working relations:

- the creation of an intimidating, hostile or isolating working environment towards individuals or groups of workers;
- unjustified interference with the performance of others' work;
- the obstruction of others' individual job prospects for mere reasons of personal competitiveness.

CERTOTTICA does not condone sexual harassment as such:

- the subordination of determinations of relevance to the recipient's working life to the acceptance of sexual favours;
- proposals of private interpersonal relations, conducted in spite of an express or reasonably evident dislike, that have the capacity, in relation to the specificity of the situation, to disturb the serenity of the addressee with objective implications on his or her work expression.

2.6.3 ALCOHOL OR DRUG ABUSE

CERTOTTICA requires each employee to personally contribute to maintaining a working environment that is respectful of the sensitivities of others. It shall therefore be considered a conscious assumption of the risk of impairment of such environmental characteristics in the course of work and in the workplace:

- serving under the influence of alcohol, drugs or substances with similar effect;
- consuming or disposing of drugs for any reason in the course of work.

Chronic substance dependency states of this nature, when affecting the working environment, will - for contractual purposes - be equated with the previous cases.

CERTOTTICA is committed to the social actions provided for in the relevant collective bargaining agreement.

2.6.4 SMOKING

Without prejudice to the general prohibition of smoking in workplaces, where this generates danger, and in any case in workplaces marked by appropriate indications, CERTOTTICA shall, in situations of coexistence at work, take into particular consideration the condition of those who feel physical discomfort in the presence of smoke and ask to be protected from contact with "passive smoke" in their workplace.

2.6.5 OBLIGATIONS FOR EMPLOYEES

Each employee is asked to be familiar with the rules contained in the Code and the reference standards governing the activity carried out within the scope of his or her function.

CERTOTTICA employees are obliged to:

- refrain from conduct contrary to these rules;
- contact their superiors, or the SB, if they need clarification on how to apply them;
- promptly report to superiors or the SB:
 - any news, directly observed or reported by others, about possible violations thereof;
 - any request made to him to violate them;
 - cooperate with the structures in charge of verifying possible violations.

If, after the report of a possible violation, the employee feels that the matter has not been adequately addressed or that he/she has suffered retaliation, he/she may refer the matter to the SB.

The employee may not conduct personal investigations or report news to anyone other than his or her superiors or the SB.

2.7 HEALTH, SAFETY AND ENVIRONMENT

As part of its activities, CERTOTTICA is committed to contributing to the development and well-being of the communities in which it operates by pursuing the goal of ensuring the safety and health of employees, contractors, customers and the communities affected by its activities, and reducing its environmental impact.

CERTOTTICA actively contributes in the appropriate fora to the promotion of scientific development aimed at environmental protection and resource conservation.

CERTOTTICA's industrial activities must be managed in full compliance with current prevention and protection regulations.

Operational management must refer to advanced criteria of environmental protection and energy efficiency while pursuing the improvement of health and safety conditions at work. Research and technological innovation must be dedicated in particular to the promotion of products and processes that are more and more compatible with the environment and characterised by increasing attention to the safety and health of operators.

CERTOTTICA employees shall, within the scope of their duties, participate in the process of risk prevention, environmental protection and health and safety protection for themselves, their colleagues and third parties.

CERTOTTICA promotes and encourages respect for the environment by choosing the best solutions with respect to reducing resource consumption and preventing pollution.

2.8 CONFIDENTIALITY

CERTOTTICA's activities constantly require the acquisition, storage, processing, communication and dissemination of news, documents and other data relating to negotiations, administrative procedures, financial transactions, know-how (contracts, deeds, reports, notes, studies, drawings, software), etc.

CERTOTTICA databases may contain, among other things, personal data that are protected by privacy legislation, data that may not be disclosed externally due to negotiated agreements, and data whose inappropriate or untimely disclosure could result in damage to corporate interests.

It is the obligation of each employee to ensure the confidentiality required by the circumstances for each piece of information he or she learns in the course of his or her work.

Corporate information of any kind (commercial, financial, technological, etc.) is an asset that CERTOTTICA intends to protect.

It is therefore forbidden to disclose to unauthorised persons (inside and/or outside the Institute) information that could jeopardise the Institute's professional and commercial assets.

CERTOTTICA is committed to protecting information about its employees and third parties, whether generated or acquired internally or in business relationships, and to preventing any misuse of such information.

Information, knowledge and data acquired or processed by employees in the course of their work or through their duties belong to CERTOTTICA and may not be used, communicated or disclosed without specific authorisation from their superior.

Without prejudice to the prohibition to divulge information relating to the organisation and production methods of the company or to make use of them in such a way as to be prejudicial to it, each employee of CERTOTTICA shall

- acquire and process only the data necessary and appropriate for the purposes of its Unit and in direct connection with its functions;
- acquire and process the data only within specific procedures;
- store the data in such a way as to prevent unauthorised others from gaining knowledge of them;
- communicate the data themselves within the framework of pre-established procedures and/or with the explicit authorisation of the superior positions, and in any case
- after having ensured the disclosability of the data in the specific case;
- ensure that there are no absolute or relative constraints on the disclosability of information concerning third parties linked to CERTOTTICA by a relationship of any nature and, where appropriate, obtain their consent;
- associate the data in such a way that any person authorised to have access to them can easily draw as accurate, exhaustive and truthful a picture of them as possible.

2.9 ACCURACY OF INFORMATION AND INTELLECTUAL PROPERTY

CERTOTTICA operates with the utmost transparency in administration and accounting, guaranteeing the truthfulness, accuracy and completeness of the information in each accounting entry.

The relevant company personnel are required to scrupulously observe all current administrative and accounting procedures.

2.10 PROTECTION OF CORPORATE ASSETS - IT TOOLS

Company personnel are required to work diligently to protect company assets by using the tools entrusted to them correctly and responsibly and by avoiding their misuse.

In particular, it is not allowed:

- use the available tools (programmes, e-mail, internet, telephone, fax, etc.) for purposes that are not related to work requirements;
- downloading programmes or installing unauthorised software, or software other than that provided by the Company;
- send e-mail messages that are insulting or that may cause offence to the person and/or damage the corporate image;
- surfing on websites with indecorous and offensive content.

CERTOTTICA reserves the right to prevent misuse of its assets and infrastructure through the use of control systems, subject to compliance with the provisions of applicable laws (Privacy Law, Workers' Statute, etc.).

2.11 COMPLIANCE WITH THE CODE OF ETHICS AND CONDUCT

Compliance with the rules of this Code shall be considered an essential part of the contractual obligations of employees. It shall also be considered an essential part of the contractual obligations of non-employee collaborators and/or persons having business relations with CERTOTTICA. In particular, the members of the committee by signing this Code of Ethics for acceptance undertake to guarantee the confidentiality of the information acquired also after the conclusion of the relationship.