



CODE OF ETHICS

 **BLIZZARD**

LOWA

MOON BOOT

NORDICA

 **Rollerblade**

 **TECNICA**



CODE OF ETHICS

INDEX

Vision	pag. 4	Integrity and compliance	pag. 17
Mission	pag. 5	Laws and standards	pag. 17
Values	pag. 6	Fighting corruption	pag. 17
Guiding principles	pag. 8	Combating money laundering and tax offences in general	pag. 17
Scope of application	pag. 9	Fighting criminal organisations	pag. 18
Protecting and developing our people	pag. 10	Conflict of interest	pag. 18
Inclusive workplace	pag. 10	Privacy	pag. 19
Diversity and the culture of plurality	pag. 11	Transparency, correctness and completeness of information	pag. 19
Professional and continuing education	pag. 11	Company resources and assets	pag. 19
Health, safety and well-being	pag. 12	Responsible use of company assets	pag. 19
Stakeholder relations manager	pag. 13	Confidentiality and corporate information	pag. 19
Shareholders	pag. 13	Protection of industrial and intellectual property	pag. 20
Public Administration and Institutions	pag. 13	Reputation	pag. 20
Judicial authority	pag. 13	Implementation and control mechanisms	pag. 21
Political and trade union organisations	pag. 14	Promotion, dissemination and training	pag. 21
Media	pag. 14	Organisational Model in compliance with the Italian Legislative Decree NO. 231/01	pag. 21
Global and local communities	pag. 14	Reports	pag. 22
Suppliers	pag. 15	Sanctions system	pag. 22
Customers and consumers	pag. 15	Final provisions	pag. 22
Competitors	pag. 16		
Representative organisations	pag. 16		
Commitment to the environment	pag. 16		
Environmental protection	pag. 16		

VISION.

INSPIRING AN ACTIVE OUTDOOR LIFE.



MISSION.

**TO CREATE
AMAZING
EXPERIENCES
THROUGH
OUTSTANDING
PRODUCTS.**



VALUES.

HUMANITY

We believe that relationships inspired by long-term, transparency and reciprocity are the secret for happiness.

Our happiness depends on ourselves and the relationships that we build with others. A shared path, rooted in an open and nurturing environment, with mutual respect and support, is the optimal way to achieve our objective.

PASSION

We take the field, always giving our best!

The dynamic business activity on which our story is built has instilled us with a desire to excel in all areas.

Driven by our passion, day after day, we accept the challenge to continuously improve our products, the world we live in and ourselves, as colleagues and individuals.

INNOVATION

We believe that it is essential to take risks in order to improve.

Innovation is a pillar of the company's culture, but stepping off the well-trodden path and going beyond is an approach involving a certain element of risk.

We are willing to accept this risk, with the experience to know how to manage it, and this helps us to move closer towards our goals, day by day.

ROOTS

We look ahead, inspired by our past.

Our company is the product of its solid foundations, but we are not afraid to look ahead, towards the future.

Improvement, growth and innovation are pillars of our business, and the work we do now consolidates our foundations enabling us to reach ever higher

COMMITMENT

Our actions trigger dynamics that go beyond business.

A company is not a self-sufficient ecosystem.

Its existence depends on its interaction with the local communities and environment where it operates.

With this awareness, we strive to ensure that our growth benefits our people, who grow with us, and our planet.

GUIDING PRINCIPLES

The Code of Ethics defines the set of principles and fundamental rules of conduct of Tecnica Group S.p.A. ("Tecnica Group" or the "Company") and all Group companies.

Based on Vision, Mission and Values, they constitute a solid reference for the sustainable success of the Group through the creation of shared value in the long term.

Tecnica Group is inspired by and promotes values within its own sphere of activity and at Group companies that are consistent with the most advanced international practices in terms of corporate social responsibility.

These include the **United Nations Global Compact**, the largest strategic corporate responsibility initiative, to which Tecnica Group adheres by means of a declaration of formal and substantial commitment to promote a healthy, inclusive and sustainable global economy, respectful of human and labour rights, capable of safeguarding the environment and actively involved in the integrity of business, in all its aspects.

To this end, Tecnica Group endorses, supports and applies the Ten Fundamental Principles of the Global Compact within its sphere of influence, and actively contributes to the achievement of the United Nations Sustainable Development Goals.

The ethical standards that Tecnica Group maintains in its activities reflect fundamental international references such as the United Nations Charter of Rights, the Charter of Rights of the European Union, the various conventions of the International Labour Organisation (in particular, Conventions 29, 105, 138, 182 on child labour and forced labour, 155 on the safety and health of workers, 111 on discrimination, 100 on equal pay, 87 and 98 on freedom of association, protection of the right to organise and collective bargaining), the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, the UN Convention on the Rights of the Child, the UN Guiding Principles on Business and Human Rights (UNGP) and the UN Women Empowerment Principles (WEP).

Compliance with the principles and provisions of the Code of Ethics is a fundamental duty for directors, employees, collaborators and all those who work with Tecnica Group in any capacity, in all relationships within and outside the Company.

More specifically, the members of the Board of Directors are required to be guided by the principles of the Code in setting objectives and implementing projects, as well as in any decision or action relating to the operations managed; likewise, managers, in implementing their management activities, shall be guided by the same principles, both internally, thus strengthening cohesion and the spirit of mutual cooperation, and towards third parties who come into contact with the Company.

SCOPE OF APPLICATION

The Recipients of the Code of Ethics are the members of the Corporate Bodies, the Staff, the Collaborators and Third Parties.

The Code of Ethics is a set of principles and rules with which the Recipients must comply, also pursuant to the provisions of the National Collective Labour Agreements on rules of conduct and disciplinary sanctions.

Compliance with the provisions of the Code of Ethics is required in the context of employment contracts of any type and nature, including those involving executives, project staff, part-time staff and semi-subordinate collaboration contracts.

Each company department supervises and ensures that its actions and activities comply with the principles and rules of conduct of this Code of Ethics.

Each department is also responsible for carrying out line controls within its own area of competence, detecting and reporting non-compliance occurring within its own area, and informing, where necessary, the Internal Audit department.

For the members of the Corporate Bodies, compliance with the Code of Ethics is a prerequisite for establishing or continuing a relationship with the Company.

The application of the Code of Ethics to Collaborators and Third Parties is subject to the signing of declarations or to the inclusion, in contracts, mandates, appointments or partnership agreements that bind them to the Company, of specific clauses that commit the party to compliance with the Code of Ethics and formalise the sanctions for violations of this commitment.

The Code of Ethics is a prerequisite for and an integral part of the Organisational, Management and Control Model adopted by the Tecnica Group pursuant to and for the purposes of Legislative Decree No. 231 of 8 June 2001. The Code is therefore a fundamental component in support of the Organisational, Management and Control Model adopted by Tecnica Group, for the prevention of the offences referred to in the above-mentioned Decree.

The Supervisory Board, set up pursuant to Legislative Decree no. 231 of 2001, monitors compliance with the Code of Ethics.

The following may therefore be submitted to the Body: (I) requests for clarifications and interpretations of the principles and contents of the Code; (II) suggestions on the application of the Code; (III) reports of directly or indirectly detected violations of the Code.

PROTECTING AND DEVELOPING OUR PEOPLE

INCLUSIVE WORKPLACE

Tecnica Group believes in people as the key to business success. It believes it is essential to cultivate the talent of each person and considers its employees a strategic resource, creators of past results and a key element of future development.

Tecnica Group recognises the value of human resources, through the protection of their physical and moral integrity, and fosters a continuous growth of technical and professional skills in a positive and stimulating working environment.

For this reason, it promotes in all its locations a working environment free from any form of discrimination or prevarication, in which respect, cooperation and mutual support can fully develop the potential of human capital.

In particular, Tecnica Group:

- rejects all forms of forced and child labour;
- rejects any behaviour constituting physical or psychological violence, coercion, harassment, bullying or attitudes leading to bullying and harassment practices;
- rejects any kind of harassment of a sexual nature howsoever carried out and any attitude or behaviour that may create discomfort or instil fear in the other person;
- establishes working relationships characterised by fairness, equality, non-discrimination, care and respect for the dignity of the person;
- promotes equal opportunities, in particular between genders, for every employee or candidate;
- respects workers' rights and trade union freedoms, such as in particular freedom of association and collective bargaining, including through a responsible and constructive dialogue with labour protection organisations;
- adopts selection and evaluation processes based on criteria of merit, competence and feasible and achievable objectives;
- recognises fair treatment in relation to role, commitment and achievements.

Tecnica Group supports and promotes, together with its values, the following working principles, which represent the rules of conduct that govern professional and personal relationships within the company:

- **Responsibility**, with reference to the activities, ideas and choices that are pursued; the reliability that inspires every action; giving one's best, with consistency and fairness.
- **Team spirit**, to be able to rely on each other as part of the same team, in the belief that the best results are achieved by working together, believing in teamwork, mutual respect and cooperation.
- **Speed and flexibility**, to react promptly to changes and find the most suitable solutions to needs in order to achieve the maximum result in the shortest possible time, as the market demands.
- **Respect** for others and the working environment, as well as for the resources that are used and for which one is responsible; demonstrate integrity and loyalty when acting, expressing one's thoughts constructively, sincerely and correctly, admitting one's mistakes and helping others to improve

DIVERSITY AND THE CULTURE OF PLURALITY

Tecnica Group believes that diversity is fundamental to originate creativity and innovation, and is therefore essential for continued growth.

For this reason, the Company promotes and supports working conditions and interpersonal relations that favour the integration and enhancement of different cultures and lifestyles, starting from the respect of gender, sexual orientation, age, nationality, health status, political opinions, race, religious beliefs and any other diversity.

It respects and values the unique contribution of each individual to the business activities and creates an inclusive working environment that respects the dignity of each person, taking into account the contribution of everyone and recognising the strength of differences.

In confirmation of its specific commitment to gender equality, considered an essential element for the Company's professional growth, Tecnica Group has signed and promotes in all Group companies the **UN Women Empowerment Principles (WEP)**.

In this context, the Company stands out for the presence of female talent in all roles and positions and at all hierarchical levels of the Group.

PROFESSIONALISM AND CONTINUING EDUCATION

Tecnica Group considers the complex of relational, intellectual, organisational and technical skills of each person as a strategic resource to be protected and enhanced, so that individual aptitudes can be realised and recognised.

It therefore promotes the development of a culture based on the dissemination of knowledge, which values everyone's behaviour and contributions.

The company believes in continuous training, in managing the business for clear and shared objectives at all levels, giving importance to the culture of feedback, as a tool for enriching people, spreading ethical values, organisational integration and promoting change and innovation.

HEALTH, SAFETY AND WELLNESS

Tecnica Group promotes a supportive, healthy and safe working environment.

Moreover, it supports, in all its activities and locations, the development of a health and safety culture built on managerial leadership and a solid management system, in order to guarantee and protect the psycho-physical integrity of staff and of all those who work, access or stay in the company's premises and facilities.

A similar approach is followed in building and maintaining inclusive and motivating working environments, aimed at people's well-being.

All Recipients are required to ensure full compliance with the law, internal procedures and any other provision laid down to prevent risks to their own safety and that of others and to ensure the protection of health and hygiene in the workplace.

UN GLOBAL COMPACTS

Principle 1:

businesses should support and respect the protection of internationally proclaimed human rights within their respective spheres of influence.

Principle 2:

businesses should make sure that they are not, even indirectly, complicit in human rights abuses.

Principle 3:

businesses should uphold the freedom of association of workers and recognise the right to collective bargaining.

Principle 4:

businesses should uphold the elimination of all forms of forced and compulsory labour.

Principle 5:

businesses should uphold the effective abolition of child labour.

Principle 6:

businesses should uphold the elimination of all forms of discrimination in employment and occupation.

RESPONSIBLE RELATIONS WITH STAKEHOLDERS

Tecnica Group considers constant and solid relationships with all its stakeholders to be of fundamental importance.

A relationship based on dialogue and active involvement is an expression of Tecnica Group's responsibility towards the social environment with which it interacts.

Stakeholders represent a wide range of different interests: establishing and maintaining stable and lasting relationships is crucial for the creation of shared and long-term value.

In particular, the Company endeavours in all circumstances to maintain fair and equitable business relations.

SHAREHOLDERS

Tecnica Group's main commitment to its Shareholders is to create value by directing its management, in the short and long term, towards policies of good corporate governance, transparency, protection and asset enhancement.

A fundamental element of the relationship with Shareholders is therefore trust, which is built through constant listening and timely information.

PUBLIC ADMINISTRATION AND INSTITUTIONS

Tecnica Group, in the context of its activities, intends to promote a constructive and transparent dialogue with the Public Administration and Institutions, also with the aim of fostering greater mutual understanding in the dialogue between the public and private sectors, with a view to developing the enterprise culture.

Those who, within their duties, have legitimate relations with the Public Administration and Public Institutions are responsible for verifying in advance, and with due diligence, that what they have declared or certified, in the interest or on behalf of the Company, is true and correct.

It is forbidden to give, offer or promise, even indirectly, money, goods, services or undue favours (also in terms of employment opportunities) to public officials and persons in charge of a public service in order to influence their decisions in the context of relations from which the Company may draw any advantage; it is also forbidden to establish personal relations with the Public Administration solely for the purpose of exerting improper influence and undue interference in the decisions that involve the Company as the recipient.

JUDICIAL AUTHORITY

Relations with judicial and supervisory authorities are characterised by maximum cooperation and transparency.

Tecnica Group undertakes to co-operate with the judicial authorities when investigations are carried out against it or against business partners, and not to obstruct their institutional activities in any way, whether actively or passively. Specifically, it is forbidden to put pressure on the person called upon to make statements before judicial and supervisory authorities, in order to induce him/her not to make statements or to make false statements; it is also forbidden to help those who have committed a criminally relevant fact to evade the investigations of the authorities, or to flee from justice.

POLITICAL ORGANISATIONS AND TRADE UNIONS

Any relations with political and trade union organisations are reserved for the company departments authorised to establish and manage such relations on the basis of the company's assigned tasks and the provisions of current procedures.

Participation by Staff in political organisations takes place outside working hours and without any connection with their duties in the Company.

Tecnica Group acknowledges and promotes the right to participate in trade union activities in accordance with current legislation and collective labour agreements.

Tecnica Group refrains from any direct or indirect pressure on politicians in order to obtain undue advantages.

MEDIA

Tecnica Group recognises and appreciates the informative role played by the media. The Company's communications to the media must be truthful, clear and transparent, with the sole limitation of the need for confidentiality that some information may present.

Information relating to Tecnica Group and directed to the media may only be disclosed by the company departments delegated to do so, in compliance with the protocols and procedures in force.

Any employee or collaborator invited, in the name or on behalf of the Company, to speak at conferences, congresses and seminars, or who writes articles addressed to the public is required to express contents and positions in line with those of Tecnica Group, in full compliance with this Code of Ethics.

GLOBAL AND LOCAL COMMUNITIES

Tecnica Group attaches great importance to its relations with the local community.

It aims to create shared value through its investment activities and supports the initiatives of associations, foundations and non-profit organisations in the fields of education, social and environmental matters, health and sport.

Financial support shall only be given to events or entities that offer guarantees of seriousness, clear and documented allocation of resources and in respect of which activities aimed at undermining compliance with the values and principles of conduct expressed in the Code of Ethics can be excluded.

SUPPLIERS

Tecnica Group promotes in all Group Companies the adoption of a Code of Conduct for Suppliers which, in addition to current legislation, takes into account the values expressed in the Code of Ethics and in general all aspects necessary for the process of responsible sourcing, such as human and labour rights, health and safety, environment, animal welfare, safety and quality of products and services, business integrity and the protection of privacy and intellectual property.

In order to safeguard its operational effectiveness and protect its resources, including its image and reputation, Tecnica Group does not enter into relations with any person who does not intend to, or who has demonstrated that he/she does not, operate in compliance with the regulations in force and according to the values expressed in the Code of Ethics.

Suppliers are selected on the basis of transparent and objective assessments of their professional expertise and business structure, taking into account quality, price and the way in which they supply goods or perform services.

In addition, Suppliers are selected on the basis of their ability to meet the confidentiality obligations imposed by the nature of the service offered.

In the context of contracts for the supply of goods and services, the technical and professional suitability of the third party is also checked, thus fulfilling the specific legal obligations in the field of safety and hygiene at work and in the field of social security and taxation.

CUSTOMERS AND CONSUMERS

In its relations with Customers, Tecnica Group ensures fairness and clarity in business negotiations and in the assumption of contractual obligations, as well as the correct and diligent fulfilment of contracts, taking care that the products and services supplied possess all the characteristics and qualities promised and declared to the customer.

Tecnica Group promotes, also through the Companies of the Group, commercial policies and strategic choices in line with best practice and the principle of professional loyalty towards Customers and Consumers.

Tecnica Group focuses its activities on the satisfaction and protection of Consumers, paying attention to requests that may lead to an improvement in the quality of the products or services provided.

In addition, Customers and Consumers must be provided with complete, up-to-date, verified and transparent information on the characteristics and quality of products and services.

Product quality and safety are constantly monitored, optimised and subject to continuous innovation, through significant investments in Research & Development and continuous improvement of the industrial system.

COMPETITORS

Tecnica Group believes in the value of free and fair competition as a fundamental tool for development and for defining the best offer in all the fields in which it operates.

To this end, it operates with the utmost transparency in compliance with current antitrust rules and with full respect for its competitors.

In the event of contacts with third party companies or competitors, Recipients shall refrain from providing information, news or confidential data that could lead to initiatives or conduct contrary to the rules and laws on market protection and competition.

REPRESENTATIVE ORGANISATIONS

Tecnica Group considers active participation in sectoral, professional, compulsory or voluntary, governmental or non-governmental representative organisations an opportunity to promote, disseminate and consolidate its ethical practices.

The Recipients, who represent the Company in such contexts, are called upon to behave, express positions and make any other active contribution in line with the principles and rules expressed in the Code of Ethics.

COMMITMENT TO THE ENVIRONMENT

ENVIRONMENTAL PROTECTION

The environment is a primary asset, and Tecnica Group is committed to safeguarding and enhancing it. To this end, it plans its activities with a view to striking a balance between economic initiatives and essential environmental needs, taking into account the future of young people.

Tecnica Group promotes the best application of scientific knowledge in the research and development of its products.

Tecnica Group aims to:

- adopt measures to minimise, mitigate and balance the environmental footprint generated by its activities;
- promote the responsible use of natural resources and the reduction of consumption;
- promote the adoption of international best practices in the field of industrial processes, the highest standards of quality, safety, protection and product innovation policies towards sustainable solutions compatible with responsible lifestyles and consumption.

UN GLOBAL COMPACTS

Principle 7:
businesses should support a precautionary approach to environmental challenges.

Principle 8:
businesses should undertake initiatives to promote greater environmental responsibility.

Principle 9:
businesses should encourage the development and diffusion of environmentally friendly technologies.

INTEGRITY AND COMPLIANCE

LAWS AND REGULATIONS

Tecnica Group adopts as an essential value of its work the respect of the principle of legality and of the legislation in force in Italy and in the international contexts in which it operates, including the applicable technical standards.

To this end, the Company undertakes to ensure that everyone is aware of the requirements arising from the laws in force in the national or international contexts in which it operates and from the internal rules of governance adopted.

Each person, in relation to his or her duties, mandate or type of relationship with the Company must know his or her responsibilities and understand the conduct to be adopted.

FIGHTING CORRUPTION

Tecnica Group excludes and condemns all forms of corruption, bribery, undue induction and influence peddling, both in the public and private sectors, and adopts prevention and control measures, including through dedicated internal procedures, aimed at avoiding the commission of such offences in the course of its activities.

COMBATING MONEY LAUNDERING AND TAX OFFENCES IN GENERAL

Tecnica Group operates in accordance with the principle of maximum transparency in commercial and financial transactions and prepares the most appropriate tools to counter money laundering or self-laundering and the reuse of illicit proceeds and any other tax offence, at national and transnational level, in full compliance with the current legislative framework.

COMBATING CRIMINAL ORGANISATIONS

Tecnica Group condemns all forms of national and transnational criminal organisations.

The Company shall not establish any employment, collaboration or investment relationship with individuals or legal entities known or suspected to be involved in terrorism or criminal organisations.

Recipients are required to check in advance the information available on commercial counterparts, suppliers, partners, collaborators and consultants, in order to ascertain their respectability before establishing business relations with them.

CONFLICT OF INTEREST

Tecnica Group's business is conducted for the benefit of all its stakeholders on the basis of principles of integrity, fairness, loyalty and transparency. In no case may partisan interests prevail to the detriment of the interests of the Company.

In the event of a conflict of interest, the Company undertakes to manage the situation in accordance with the law, internal governance and the principle of transparency.

The members of the Corporate Bodies maintain a conduct inspired by autonomy and independence with Public Institutions, economic and political institutions, as well as with any other natural or legal person.

The Corporate Bodies are required, in particular:

- to assess and communicate to the management and control bodies any situations of conflict of interest, even potential, or incompatibility of duties, tasks or positions outside and inside the Company;
- to refrain from acting in a way that may cause damage to the Company and from participating in the approval of resolutions of the body to which they belong relating to matters in which situations of conflict of interest, even potential, may arise;
- to avoid using confidential information of which they are aware by virtue of their office or position to obtain personal advantages, direct or indirect, or to obtain them from third parties.
Staff are required to avoid real or apparent situations in which the interest (economic, financial, family or other) of the individual interferes or tends to interfere with the ability to make impartial decisions in the interests of Tecnica Group and to fulfil the duties and responsibilities. In particular, Staff are required not to:
- take up employment with third parties, as well as consultancy work or other responsibilities on behalf of third parties without the prior authorisation of the Company;
- take a decision-making or operational role in company activities if they can be influenced by personal interests that are such as to hinder the taking of impartial decisions;
- take personal advantage of business opportunities of which they have become aware in the performance of their duties.
Staff who believe they may be involved in a conflict of interest, even if apparent, are required to refrain from making decisions, to the extent that such involvement is or may be influenced by their own interests, and to promptly notify the company, in accordance with the procedures laid down in internal procedures.

PRIVACY

Tecnica Group undertakes to treat personal data and confidential information, which may be collected in the course of carrying out its business, in accordance with the relevant laws and applicable best practice.

Tecnica Group protects the right to privacy of individuals, customers, suppliers, business partners and all those with whom it establishes relations, using data and information only for defined and appropriate purposes.

In implementing these principles, the Company has set up a Privacy Focal Committee, dedicated to privacy issues, in constant coordination with the Data Protection Officer.

In addition, Tecnica Group ensures respect for the rights of data subjects and adopts policies and operating instructions to improve the security of applications and personal data processing.

Privacy by design and by default is part of digitisation processes, as is risk analysis and protection of sensitive data.

TRANSPARENCY, CORRECTNESS AND COMPLETENESS OF INFORMATION

Tecnica Group pays the utmost attention to the transparency, correctness and completeness of the data and information contained in the financial statements, reports or other corporate communications required by law and addressed to shareholders, third parties and auditors.

Tecnica Group is committed to ensuring that the bodies responsible for preparing the financial statements and corporate communications carry out their activities in compliance with the procedures laid down in the Organisational Model and with the principles of transparency, correctness and completeness.

COMPANY RESOURCES AND ASSETS

RESPONSIBLE USE OF COMPANY ASSETS AND COMPUTER SYSTEMS

Each Recipient is required to act diligently to protect corporate assets and avoid any improper use thereof, which may cause damage, reduce efficiency or in any case be contrary to corporate procedures.

All persons are responsible for the protection of the company's assets and the use of the information systems under their direct control. Internet use and e-mail messages from company accounts should only relate to work-related topics.

CONFIDENTIALITY AND CORPORATE INFORMATION

Company information and documentation is one of the main elements of the assets of the Company, and therefore of every stakeholder. Their unauthorised dissemination can create economic and reputational damage.

Without prejudice to the relevant legal provisions, Staff and Collaborators are required to maintain the utmost confidentiality on documents and, in general, on all company information (including business plans and strategic projects, marketing, pricing and sales data, commercial and organisational details).

Staff and Collaborators may not use the information and documentation to which they have access in the course of their duties for anything other than professional use and are bound by strict professional secrecy.

Confidential information may only be disclosed within the company organisation to those who can prove that they need it for business reasons.

PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY

Tecnica Group acts in full respect of the industrial and intellectual property rights legitimately held by the Company itself and by third parties, as well as of the laws, regulations and conventions, including those at EU and/or international level, protecting such rights.

Intellectual property, patents, trademarks, logos, copyrighted materials, inventions, trade secrets and other confidential internal information - including business plans and strategic projects, marketing, pricing and sales data, commercial and organisational details - together constitute an extremely valuable asset on which the Tecnica Group's competitive strength is based.

Tecnica Group encourages and promotes the innovation and technological evolution of products and processes by its own Employees and by third parties who work for the Company.

Everyone is required to:

- refrain from any conduct that may constitute encroachment on industrial property rights, alteration or counterfeiting of distinctive signs of industrial products, or of patents, industrial designs or models, whether domestic or foreign, or infringement of intellectual property protected by copyright;
- not allow third parties to use the Group's trademarks or intellectual property without the necessary authorisation and an approved licence agreement;
- not allow third parties to use proprietary material and logo material in an unauthorised or improper manner;
- endeavour to guard intellectual property with the utmost care, disclosing it only when strictly necessary and with prior authorisation, within the framework of confidentiality agreements.

REPUTATION

All Recipients, and in particular the Corporate Bodies and Staff, protect the reputation of Tecnica Group by acting in accordance with the principles of the Code of Ethics.

This requires a use of the brand that is fully consistent with the Vision, Mission and Values and actions on social networks, or otherwise in the public domain, not likely to damage the reputation of the Company, even potentially.

IMPLEMENTATION AND CONTROL MECHANISMS

PROMOTION, DISSEMINATION AND TRAINING

Tecnica Group is committed to ensuring that the Code of Ethics is disseminated and known to all stakeholders, and in particular to adequately disseminate the content of the Code and the principles which inspire it among the Companies of the Group and its Collaborators.

In order to ensure the proper dissemination and understanding of the Code of Ethics, the Company has provided for its publication on the websites of the Group companies and on the corporate intranet and arranges for the delivery of this Code of Ethics to Staff at the time of recruitment.

Tecnica Group also promotes training courses for its Collaborators aimed at ensuring that they fully understand the principles and rules laid down in this Code of Ethics.

The Code of Ethics is also shared with external parties who collaborate with Tecnica Group (external collaborators, consultants, clients, suppliers, etc.) also through the use of specific contractual clauses.

This Code of Ethics is adopted by Tecnica Group and its Group Companies.

ORGANISATIONAL MODEL IN COMPLIANCE WITH THE ITALIAN LEGISLATIVE DECREE NO. 231/01

The Code of Ethics is a prerequisite for and an integral part of the Organisational, Management and Control Model adopted by Tecnica Group pursuant to and for the purposes of Legislative Decree No. 231 of 8 June 2001.

The Supervisory Board, appointed by the Board of Directors pursuant to Legislative Decree No. 231 of 8 June 2001, is called upon to monitor compliance with the Code of Ethics.

The Board of Directors is required, through its decisions and actions, to promote an ethical environment in the Company consistent with the values expressed in the Code of Ethics.

The operational implementation of the rules of conduct of the Code of Ethics is the responsibility of the Directors and of all the Company Staff, each within his or her competence.

It is the duty of the Board of Directors, also on the basis of the corrective or improvement measures proposed by the Supervisory Board, to update the Code of Ethics in order to adapt it to the evolution of civil and social awareness or to changes in the reference regulations and practices.

REPORTS

Tecnica Group adopts the measures deemed most appropriate to facilitate the timely reporting of violations of the Code of Ethics, drawing inspiration from the principles and prescriptions of Law no. 179 of 30 November 2017 on Whistleblowing.

The duty to report involves the members of the Corporate Bodies, the Staff and the Collaborators and concerns facts or behaviours in breach of the Code of Ethics of which they are directly aware or which have come to their knowledge through the communication of others, including Third Parties.

Reports may also be anonymous. Reports should be as detailed and factual as possible.

Reports must be made to the e-mail address of the Company's Supervisory Board odv.tecnicagroup@gmail.com or by ordinary mail addressed to the Supervisory Board at the Company's registered office odv@tecnicagroup.com or through the dedicated mailboxes located in the access areas of Tecnica Group.

Reports shall be handled in accordance with the provisions and procedures laid down in the Whistleblowing and Report Management section of the Company's Organisation, Management and Control Model, which is hereby referred to.

The Company prohibits any act of retaliation or discrimination, direct or indirect, against the whistle-blower for reasons directly or indirectly related to the report, even if the report proves to be unfounded in substance.

The Company reserves the right to take action against anyone who makes untrue reports or reports intended to damage the Company, the Corporate Bodies or the Staff, with malice or gross negligence.

PENALTY SYSTEM

Tecnica Group condemns any behaviour which does not comply with the provisions of the Code of Ethics, even if the behaviour is carried out in the interest of the Company or with the intention of bringing it an advantage.

Violations of the Code of Ethics shall be subject to the penalty system adopted pursuant to the Company's Organisation, Management and Control Model, which is hereby referred to.

FINAL PROVISIONS

This Code of Ethics was approved by the Board of Directors of Tecnica Group S.p.A. on 16 December 2021 and will be implemented by all subsidiaries of Tecnica Group as part of the management and coordination activities exercised by the parent company.

The document is available on the website www.tecnicagroup.com.

This Code of Ethics is effective as of 1 January 2022 and will be regularly reviewed and updated.





TECNICA GROUP S.p.A.
VIA FANTE D'ITALIA N. 56 - GIAVERA DEL MONTELLO (TV) - ITALY
tecnicagroup.com