

Company Code of Ethics

2025



harmont&blaine

Harmont & Blaine S.p.A.

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1. INTRODUCTION

Harmont & Blaine S.p.A. (hereinafter also referred to as the “Company” or, in short, “Harmont & Blaine”) is one of the most exciting and dynamic players in the world of casual wear. The reasons for the success the market has bestowed upon the “dachshund” brand lie in the strength of an entrepreneurial vision that embodies originality, consistency and innovation. The Company evolves and transforms, and with it, lifestyles change.

People’s very conception of life is changing. From this observation springs the concept that inspires every Harmont & Blaine creation, and which underpins the company’s mission: to provide individuals with ‘elements of coherence’ in line with the lifestyle to which they aspire.

Through its new brand statement, *‘feel good everyday style’*, Harmont & Blaine expresses its full stylistic coherence, driven by the playful and positive vibes of Italian style and the unmistakable Mediterranean appeal. A brand characterised by a dynamic and sunny style that is free from formality and dullness, it is authentic and genuine, with a contemporary character and a sociable nature.

Building on the brand’s strength, business activities have been developed to date, primarily focused on:

- The production of clothing and related accessories, either directly or under licence
- Multi-channel distribution (wholesale, retail, e-commerce)

Harmont & Blaine’s objective is to maintain and strengthen the brand’s unique character and global awareness, and to expand its presence in related business sectors through the following strategic lines:

- Penetration of new geographical markets
- Expansion of direct and indirect retail channels and multi-channel operations
- Expansion of business lines (apparel and non-apparel)
- Focus on direct dialogue with customers

Harmont & Blaine is a company which, given its size and the scale of its operations, plays a significant role in the market, economic development and the well-being of the communities in which it operates.

A good reputation is an essential intangible asset for Harmont & Blaine and must never be overlooked by its employees, as it fosters investment, customer loyalty, the attraction of the best human resources and sound relationships with suppliers and creditors.

Harmont & Blaine considers it essential to conduct all its activities in full compliance with all legal regulations and within a framework of fair competition, with honesty, integrity, fairness and good faith, whilst respecting the legitimate interests of customers, employees, commercial and financial partners, as well as the communities in which the Company operates.

Through this Code of Ethics (hereinafter also referred to as the ‘Code of Ethics’), Harmont & Blaine, as a company and on behalf of all its staff, formally adopts the principles of lawfulness, fairness, transparency and verifiability as the basis for its conduct.

This document sets out the ethical commitments and responsibilities that the Company intends to adopt in the conduct of its business in order to safeguard its publicly recognised reputation.

This Code of Ethics represents the framework through which the Company relates to all parties with whom it comes into contact in terms of rights, duties and responsibilities. This document is based on

synergistic cooperation between all parties who interact with the Company in various capacities, whilst respecting each party's role, in pursuit of the Company's mission and corporate purpose.

Furthermore, through the Code of Ethics, Harmont & Blaine makes binding the principles of conduct and rules of behaviour relevant also for the purposes of preventing the offences indicated in Italian Legislative Decree 231 of 8 June 2001 and subsequent amendments and supplements (hereinafter also referred to as the 'Decree').

2. SCOPE OF APPLICATION

The Code of Ethics and the provisions contained therein are to be considered binding, without exception, and their Recipients are the 'Corporate Bodies' and 'Supervisory Bodies', 'Senior Management' and all employees and collaborators of the Group, regardless of the nature of their relationship with the Group, including temporary arrangements.

'Senior Management' refers to Harmont & Blaine's governance structure, namely the Board of Directors, which is responsible for defining strategic guidelines and supervising activities. At the operational level is the General Manager, who manages the implementation of strategies and coordinates the various corporate functions.

Harmont & Blaine requires all stakeholders who interact with the Company in any capacity to comply with the principles set out in this Code of Ethics.

Recipients are also required to:

- refrain from conduct contrary to the provisions of the Code of Ethics;
- consult their line managers and/or the relevant Company departments or bodies should they require clarification on how to apply the provisions of the Code of Ethics;
- promptly report to their superiors and/or to the relevant Company departments or bodies:
- any information, whether directly observed or reported by others, regarding possible breaches of the Code of Ethics;
- any request to breach the rules that has been made to them;
- cooperate with the Company departments responsible for investigating possible breaches of the provisions of the Code of Ethics, providing any information requested for this purpose.

None of the Recipients may conduct personal investigations or report the information to anyone other than the parties referred to in point (c) above.

Furthermore, Harmont & Blaine requires all suppliers to conduct themselves in a manner consistent with the principles and provisions of this Code of Ethics.

To this end, Harmont & Blaine proposes that Recipients of the Code of Ethics with whom it has contractual relationships sign specific clauses, subject to the consequences provided for in Article 1456 of the Italian Civil Code.

The Supervisory Body of Harmont & Blaine oversees compliance with the Code of Ethics. Every Recipient must be aware of the principles and the conduct required.

To this end, Harmont & Blaine's Supervisory Body ensures, as set out in more detail in paragraph 8:

- The widest possible dissemination of and compliance with the Code of Ethics amongst the Recipients;

- The constant review and updating of the Code of Ethics, in order to adapt it to changes in public sentiment and relevant regulations;
- The provision of appropriate information and clarification tools regarding the interpretation and implementation of the Code of Ethics;
- The carrying out of immediate investigations in the event of reports or suspicions of breaches of the Code of Ethics, and the application of appropriate disciplinary measures in the event of a confirmed breach;
- The protection of the anonymity of individuals who report possible breaches of the Code of Ethics.

3. INTRODUCTION

This Code of Ethics, as a charter of corporate values, rights and duties, is a tool adopted independently by the Company and forms an integral part of the Organisation, Management and Control Model pursuant to Legislative Decree 231 of 8 June 2001, which in turn forms part of the Company's broader compliance system.

This Code is intended to regulate standards of conduct within the Company's day-to-day activities, serving as the guidelines upon which the Organisation, Management and Control Model is based.

The adoption and effective implementation of the Organisation, Management and Control Model may serve as a means of limiting or exempting the Company from administrative liability under Legislative Decree 231/2001.

The Company aims to maintain and develop a relationship of trust with every category of individual, group or institution with whom a relationship is required to fulfil the corporate mission, as well as with those who make investments related to the Company's activities, basing its relationships on the principles of impartiality, honesty, fairness and confidentiality, whilst protecting shareholders, employees and the community.

Under no circumstances may the belief that one is acting in the Company's best interests justify conduct that conflicts with the principles set out in this Code or with applicable laws and regulations.

In the conduct of business affairs, behaviour by any person – individually or collectively – on behalf of, in the interests of, or for the benefit of the Company, which violates the rules of civilised coexistence and proper social and commercial relations, as provided for and governed by laws and regulations, is not considered ethical.

Engaging in unethical conduct is capable of compromising relations between the Company and its shareholders, employees, collaborators, and, more generally, with stakeholders and the community.

A breach of the provisions contained in the Code therefore constitutes a disciplinary offence and, as such, is prosecuted and sanctioned in accordance with and for the purposes of Article 7 of Italian Law 300/1970 and may entail compensation for the damage caused.

No Code, however, can cover every situation that people may face in the course of their work. Compliance with the law must therefore be the basis for all action, as all business decisions and related conduct must be based on ethical principles, accompanied by responsible, fair and sensible behaviour.

3.1 The value of reputation

A good reputation is an essential intangible asset. A good reputation fosters shareholder confidence, customer satisfaction, the attraction of the best human resources, supplier confidence and reliability towards creditors. It also promotes, in internal relations, the adoption and implementation of decisions reached by mutual agreement, and the planning, organisation and execution of work without the rigid exercise of authority.

At the same time, the solemn affirmation of specific principles of conduct in dealings with the Public Administration, as well as in relation to the rights and interests of shareholders, creditors and third parties, is a manifestation of Harmont & Blaine's commitment to the prevention of offences referred to in Legislative Decree 231/01.

For the reasons set out above, the Company has deemed it important to clearly define the values it upholds and to establish the responsibilities and sanctions for non-compliance with these values.

3.2 The Structure of the Code of Ethics

The Code of Ethics consists of:

- General ethical principles;
- Ethics in relations with third parties, the community and employees;
- Effectiveness of the Code of Ethics and violations.

4. GENERAL PRINCIPLES OF BUSINESS ETHICS

The Company's activities must be carried out in compliance with the law and in accordance with the principles of impartiality, honesty, transparency, fairness and good faith towards shareholders, the Recipients, as well as public administrations and stakeholders or entities with which the Company comes into contact in the course of its institutional and/or operational activities. In particular, the Recipients are required to:

- always **behave in accordance with the principles of loyalty and good faith** towards the Company, line managers, colleagues and associates, basing their conduct on mutual cooperation;
- ensure that every business transaction is undertaken **in the interests of Harmont & Blaine** and not in their own personal interests or those of third parties. In particular, employees who find themselves in a situation of personal, financial, family or other conflict of interest, even if only potential, must inform their Managers and, going forward, refrain from any action prejudicial to the company's interests or likely to cause a conflict of interest. Harmont & Blaine, precisely in order to avoid situations where those involved in a transaction are, or may appear to be, in conflict with the Company's interests, prohibits practices of corruption, unlawful favours, collusive behaviour, solicitations—whether direct or through third parties—of personal or career advantages for oneself or others, and other similar conduct;
- ensure **the integrity of information**: information managed within one's area of responsibility must be handled and communicated in a complete, accurate and truthful manner;
- maintain the **confidentiality of news and information** learned in the course of one's duties and refrain from using or disclosing, for one's own benefit or that of third parties, any inside information obtained in the course of one's duties.

These principles are set out below.

Impartiality

In decisions involving stakeholders, Harmont & Blaine avoids any discrimination on the grounds of age, gender, sexual orientation, health status, race, nationality, political opinions, religious beliefs or other criteria that interfere with the fundamental rights and freedoms of individuals.

Honesty

In the course of their professional activities, all Recipients are required to diligently comply with the laws and regulations in force in the countries in which they operate, the Code of Ethics, company procedures, internal regulations and, where applicable, the rules of professional conduct. However, under no circumstances may the pursuit of the Company's interests justify dishonest conduct.

Anti-Money Laundering

Harmont & Blaine operates in compliance with national and international anti-money laundering rules and regulations; as such, it requires Recipients to refrain from carrying out any transaction that may contribute to the transfer, substitution or otherwise the use of illicit proceeds, or that may in any way hinder the identification of money, assets or other benefits of criminal origin.

Employees and collaborators of the Company are prohibited from receiving cash payments outside the course of retail business activities, in the context of which collaborators are obliged to verify the counterparties in the event of sales made using bearer payment instruments or cash exceeding the limits set by law. Furthermore, employees and collaborators are prohibited from substituting or transferring assets or other benefits where there is even a mere suspicion of illicit origin, nor from carrying out, in relation to them, any other transactions that may block the proof of their criminal origin. It is also prohibited to use the aforementioned resources or assets in economic activities.

Furthermore, payments must never be made in cash nor directed to any person other than the representative authorised by the contracting party.

Conflict of interest

In all activities carried out and in all relationships maintained by the Company, situations of conflict of interest, or those that may even merely appear to be a conflict of interest, must be avoided. In all circumstances where such a situation is unavoidable, the party with the conflicting interest must give prior notice to the Supervisory Body, unless the situation is already known to the Supervisory Body and to the entire Company.

A conflict of interest exists, for example, where:

- An employee pursues an interest other than the company's mission or takes advantage of the company's business opportunities;
- A 'Corporate Body', a shareholder or a member of senior management is in competition with the Company;
- Representatives of customers and suppliers (and stakeholders in general) act in breach of the fiduciary duties associated with their position.

Confidentiality

Harmont & Blaine ensures the confidentiality of the information in its possession, refraining from seeking, disclosing or using confidential data, except where expressly authorised by the owner of such information, and in any case in compliance with applicable regulations.

Senior management, employees, business partners, external consultants and contractors must conduct themselves with the utmost discretion, even outside working hours, in order to safeguard the Company's know-how in all areas of its business, including internal matters (e.g. information relating to technical, financial, legal, administrative, commercial and personnel management issues, etc.).

The above provisions apply in particular to those who come into possession of confidential and material information by virtue of their duties.

It is therefore prohibited to disclose confidential information by any means whatsoever, with the express provision that any breach of this obligation seriously undermines the relationship of trust with the Company and may result in the application of disciplinary or contractual sanctions, in addition to the possible initiation of legal proceedings before the competent courts.

Relations with shareholders

Harmont & Blaine creates the conditions to ensure that shareholders participate fully and in an informed manner in decisions within their remit, guarantees equal access to information, and safeguards its own interests and those of its shareholders from initiatives not based on the principles of transparency and fairness.

Furthermore, the Company endeavours to ensure that its economic and financial performance is such as to safeguard and enhance the value of the business, with a view to adequately remunerating the shareholders' investment.

Value of human resources

All employees are an indispensable factor in the success of Harmont & Blaine and for this reason, the Company is committed to safeguarding and promoting the value of its human resources with the aim of improving and enhancing their experience, skills and knowledge base.

Respect for the individual

Harmont & Blaine guarantees the physical and moral integrity of all its employees, ensuring, amongst other things, working conditions that respect individual dignity, free from incidents of intimidation, mobbing and stalking, whilst respecting personal beliefs and opinions, as well as ensuring the provision of safe and healthy working environments.

Harmont & Blaine does not tolerate behaviour that induces people to act contrary to the law, the Code of Ethics and/or the personal or moral convictions of each individual.

Fairness in relations between employees

Relationships between employees, at all levels, must be characterised by fairness, cooperation, loyalty and mutual respect, and must be free from racial, ethnic, sexual, religious and ideological discrimination.

In hierarchical relationships, or in any situation involving subordination or a difference in status, authority must be exercised with fairness, respect and moderation, avoiding any abuse.

In particular, any exercise of power that undermines the dignity and autonomy of employees and collaborators must be avoided, and decisions regarding the organisation of work must always safeguard the value of individual relationships.

Quality of services and products

The Company focuses its activities on customer satisfaction and protection, giving the utmost consideration to requests that may help improve the quality of its services and products. Harmont & Blaine therefore undertakes to provide customers with products and services that are consistent with the brand's image and customer expectations, conducting its research, development and marketing activities in accordance with the highest quality standards.

Fair competition

Harmont & Blaine refrains from engaging in conduct that in any way violates the principles of legality and fair competition.

Transparency

The Company and its employees are committed to providing complete, transparent, comprehensible and accurate information, enabling its customers and, more generally, stakeholders and shareholders to make independent and informed decisions.

Environmental protection and social responsibility

Harmont & Blaine conducts its business and makes its investments in an environmentally sustainable manner, respecting the communities in which it operates and supporting initiatives of cultural and social value. The Company is also committed to protecting and safeguarding the environment as a primary and shared asset, constantly seeking a balance between business interests and respect for the environment.

Responsibility

Continuous improvement is primarily the result of responsible cooperation, which can be achieved through personal collaboration between professionals in different areas of activity, and between colleagues and employees within the same division, which is a necessary condition for the Company's growth and development. Actions, at all levels and degrees of responsibility, must be mutually directed towards creating the best possible product, thereby fostering a shared commitment to the corporate mission.

Anyone in the role of manager, supervisor or executive must set an example, provide leadership and guide others in accordance with the principles contained in the Code of Ethics; through their conduct, they must also demonstrate to colleagues that compliance with the Code of Ethics is a fundamental requirement for everyone's work and for the achievement of business results.

Communication

The Company recognises the primary role of **clear and effective communication** in internal relations within the Company and in relations with group companies.

Information intended for external audiences must be approved internally by the Company and managed exclusively by employees designated as responsible for communications. Conduct and actions contrary to this principle will be sanctioned in accordance with the provisions of the Code of Ethics, contracts and applicable laws.

Anti-corruption

Harmont & Blaine regards corruption as an obstacle to efficiency and healthy competition; therefore, the Company disapproves of any conduct that conflicts with these values.

Compliance with this Code of Ethics and applicable legislation constitutes one of the fundamental principles underpinning Harmont & Blaine's business operations; all Recipients are required to act with transparency, honesty, integrity, fairness and loyalty.

5. ETHICS IN RELATIONS WITH THIRD PARTIES

5.1 Relations with shareholders and protection of creditors

The Company pursues objectives of continuous improvement of its corporate governance system by adopting rules of transparency and fairness in business management. The structures responsible for pursuing these objectives are geared towards the constant strengthening of internal control and management tools, taking into account the objectives of accounting transparency, operational efficiency and compliance.

In this way, Harmont & Blaine aims to ensure the preservation and safeguarding of the integrity of the share capital, the protection of creditors and third parties who enter into dealings with the Company, and, more generally, the transparency and fairness of business activities from an economic and financial perspective, including with a view to preventing the commission of corporate offences as set out in Article 25-ter of Legislative Decree 231/01.

Accounting transparency is based on the truth, accuracy and completeness of the information underlying the relevant accounting records. All Harmont & Blaine employees are required to cooperate to ensure that operational transactions are accurately and promptly reflected in the accounts.

Any Recipient who becomes aware of omissions, falsifications or negligence in the accounts or in the documentation on which the accounting records are based is obliged to report the facts to their superior or directly to the Supervisory Body.

The Company aims to foster, at every level, a culture characterised by an awareness of the existence of controls and a mindset geared towards their implementation.

Internal controls refer to all activities and tools necessary or useful for directing, managing and verifying business activities with the aim of ensuring:

- The cost-effectiveness (efficacy and efficiency) of business operations in accordance with corporate strategies, objectives and policies, including for the purpose of safeguarding the company's assets;
- The reliability of the company's information system, both in terms of its components designed for the preparation of the financial statements intended for publication and those designed for the preparation of internal management reporting;
- Compliance with the regulations applicable to the company.

The implementation of controls, with particular reference to line controls (so-called first-level controls, understood as the set of control activities aimed at ensuring the proper conduct of operational processes), is a primary responsibility of operational management and all employees.

5.2 Standards of conduct in business

Recipients must conduct themselves correctly in matters of interest to the Company, regardless of market competition and the importance of the transaction in question. Corrupt practices, unlawful favours, collusive behaviour, pressure and solicitation, whether direct or through third parties, the granting of personal or career advantages for oneself or others, and copyright infringement are prohibited.

Gifts and gratuities

Gifts, presents, hospitality or other benefits may not be accepted or offered in dealings with third parties, unless their value does not exceed normal commercial or courtesy practices, or unless they are not intended to secure favourable treatment in connection with the Company's activities or are likely to compromise the Company's image.

Any company representative, collaborator or employee who receives gifts or other forms of unauthorised benefits must take all appropriate steps to refuse them, informing their superior and the Supervisory Body, who will assess the appropriateness of such benefits and, if necessary, inform the sender of the Company's policy on the matter.

Furthermore, Recipients must not promise or offer gifts, favours, benefits (whether direct or indirect) or acts of courtesy or hospitality that exceed normal commercial practices, local customs and ordinary courtesy, or which are intended to secure favourable treatment or other undue advantages in relation to business transactions attributable to Harmont & Blaine.

Recipients must not offer or promise to customers, political institutions, public administrations and, in general, to third parties, gifts, favours, benefits (whether direct or indirect) and acts of courtesy or hospitality that exceed the limits, or have the characteristics, indicated above.

Gifts offered by Harmont & Blaine are intended solely to promote the company's image and, in any event, must be provided in accordance with the rules and principles defined by the Company.

Communication

Harmont & Blaine is committed to representing its interests and position in a transparent, rigorous and consistent manner, communicating and disseminating information externally in accordance with the right to information and in a truthful and accurate manner, whilst avoiding any situations that might constitute a breach of the rules of fair competition.

Intellectual Property

Harmont & Blaine is committed to conducting its business whilst respecting and protecting the intellectual property rights of third parties.

Combating crime

The Company conducts its activities and develops its business by condemning and combating all forms of crime, reporting any behaviour that violates the principles of legality and fair competition should it become aware of such behaviour.

5.3 Customer relations

Harmont & Blaine is committed to not arbitrarily discriminating against its customers, but rather to promoting the development of its staff's skills and encouraging technological innovation, with the aim of achieving maximum customer satisfaction.

In this regard, the Company undertakes to:

- Meet its customers' expectations to the best of its ability by providing efficient services and quality products that meet or exceed the customer's reasonable expectations and needs;
- Provide accurate, comprehensive and truthful information about the products offered so that the customer can make informed decisions;
- Listen to the customer's needs with the aim of resolving their problems;
- Be truthful and transparent in advertising and other communications.

A focus on health, safety and the environment are essential aspects of Harmont & Blaine's operations; for this reason, the Company only markets products of a high quality standard, verified through stringent checks covering the entire production cycle and carried out with respect for the environment, in compliance with relevant regulations.

5.4 Supplier relations

In its procurement processes and in the management of supplier relationships, the Company is committed to adopting a collaborative approach:

- Ensuring the reliability, integrity and professionalism of the other party before establishing relationships or entering into contracts with them;
- Guaranteeing equal opportunities;
- Adopting objective evaluation criteria when selecting suppliers, in accordance with procedures that are declared in advance and are transparent;
- Ensuring that business requirements – namely quality, costs and delivery times – are consistently met;
- Ensuring compliance with the law in the performance of individual activities;
- Verifying that the delivery, performance of works, services and supplies always complies with contractual agreements;
- Drawing up agreements in the format predefined by Harmont & Blaine, and in any case in writing, and entering into them before the start of the activity;
- Requiring the supplier to adhere to specific social obligations (e.g. protection against child labour, non-discrimination, etc.);
- Providing for the possibility of inspections of the supplier's production units or operational sites in order to verify compliance with these requirements;
- Guided by the principles of fairness and good faith in correspondence and dialogue with suppliers, in line with the strictest commercial practices.

From the selection stage onwards, suppliers are made aware of the Company's commitment to ethical principles and the fact that compliance with these principles contributes to the evaluation and selection process. They are contractually required to comply with the provisions contained in this Code, and appropriate sanctions are established in the event of a breach, such as, for example, termination of the contract.

5.5 Relations with business partners and external consultants

Business partners, external consultants and garment manufacturers are required to comply with the principles and provisions contained in the Code of Ethics.

Agreements with the latter must be drawn up in the form predefined by the Company, and in any case in writing, and must be entered into before the start of the activity.

External collaboration contracts must include an obligation to comply with the Code of Ethics and establish appropriate sanctions in the event of a breach thereof, such as, for example, termination of the contract. In any case, the remuneration to be paid must be exclusively commensurate with the service specified in the contract and, in any event, with the professional skills and the actual service provided; it must also be supported by appropriate documentation (invoice, etc.), properly channelled and duly recorded.

Any conduct on the part of Collaborators, Consultants or other parties having contractual relations with the Company, in breach of the provisions of the Code of Ethics, may also result in the termination of the contractual relationship, without prejudice to any claim for compensation by Harmont & Blaine, should such conduct cause it to suffer damage.

6. ETHICS IN RELATIONS WITH THE COMMUNITY

6.1 Environmental Protection

Harmont & Blaine is attentive to environmental issues and is aware of the strategic role of the environment as a tool for the continuous enhancement of the company and its reputation.

To this end, the Company pursues objectives of continuous improvement and sustainable development by defining and keeping its environmental policy up to date. In accordance with this policy, the Company:

- Defines and develops guidelines for implementing the environmental strategy;
- Identifies and uses indicators to monitor environmental impacts;
- Constantly monitors environmental legislation by training the relevant professional staff.

In particular, with regard to environmental matters, the Company:

- adopts measures designed to limit and – where possible – eliminate the negative impact of economic activity on the environment;
- plans for the careful and ongoing monitoring of scientific progress and regulatory developments in environmental matters;
- promotes production policies that balance the needs of economic development and value creation, inherent to its business activities, with the need to respect and safeguard the environment, fostering a culture of environmental risk prevention.

Recipients **must**:

- strictly comply with environmental legislation;

- assess potential risks and develop appropriate prevention programmes to protect the environment;
- establish and update emergency procedures in order to minimise the effects of any accidental discharge into the environment;
- manage all activities relating to the collection, temporary storage, transport and disposal of company waste, even where these are carried out by third parties, in accordance with the provisions of the Consolidated Environmental Act and other relevant regulations;
- monitor the management of ozone-depleting substances present in the air-conditioning systems of the plant and offices.

Recipients **must not:**

- illegally abandon or deposit waste on or in the ground;
- unlawfully discharge waste of any kind, whether solid or liquid, into surface or groundwater;
- release harmful emissions into the air.

Harmont & Blaine promotes and encourages continuous improvement in environmental matters, organising awareness-raising and training activities for staff and employees aimed at fostering an environmental culture and achieving environmental objectives and targets.

6.2 Relations with Trade Unions and Associations

The Company recognises the equal dignity of political parties as free associations of citizens who join together to contribute 'through democratic means' to shaping national policy, and considers the possibility of making contributions to them, in compliance with current laws on party funding, without such contributions in themselves constituting a breach of the principle of neutrality, which guides the Company in its relations with political parties, or may result in, or attempt to result in, a return in terms of advantages or benefits.

Like political parties, the Company recognises the important social role played by trade unions, as organisations established to defend the interests of specific categories of workers.

The Company refrains from undertaking initiatives that may directly or indirectly constitute forms of pressure or undue favours towards political or trade union representatives or political or trade union organisations.

6.3 Institutional relations

Harmont & Blaine's relations with national, EU and international public institutions ('**Institutions**'), as well as with public officials or persons entrusted with public service duties, or bodies, representatives, agents, members, employees, consultants, persons entrusted with public functions or services, of public institutions, public administrations, public bodies—including economic public bodies—and public entities or companies of a local, national or international nature ('**Public Officials**') shall be conducted by each Recipient, regardless of their role or position, in compliance with current legislation and the principles set out in this Code of Ethics, based on the general criteria of fairness and integrity.

Recipients shall refrain from making false statements to the Judicial Authorities or from inducing third parties to make false statements to the Judicial Authorities in order to influence judicial decisions to their own advantage.

Each Recipient is therefore required to act in good faith and to give testimony truthfully and without omission when requested. To this end, the Company undertakes to represent its interests and position in a transparent, rigorous and consistent manner, avoiding any collusive behaviour.

In order to ensure maximum clarity and transparency in such relations, contact with institutional counterparts is handled exclusively by the departments formally designated for this purpose.

6.4 Contributions and sponsorships

Harmont & Blaine may consider requests for funding, limited to proposals from organisations and associations that are explicitly non-profit and have valid articles of association and constitutive documents, provided that such proposals are of high cultural or charitable value and relate to social, environmental, sporting, entertainment or artistic matters. The Company provides grants and sponsorships exclusively to counterparties and for events capable of offering the highest guarantee of quality and professionalism, subject to the establishment of a dedicated internal procedure setting out the departments involved in the process, from the setting of maximum limits to the authorisation of disbursement.

6.5 Relations with the Public Administration

Harmont & Blaine, in managing its relations with the Public Administration and Public Authorities, operates in accordance with defined ethical principles, refraining from conduct that could in any way lead the Company to commit offences against the Public Administration.

The Company recognises the value of impartiality and justice, and conducts its affairs in a manner designed to facilitate their proper functioning.

Consequently, the Company prohibits any conduct that may prejudice the work of the judicial authorities.

Furthermore, Harmont & Blaine declares itself to be constantly at the disposal of the Judicial Authorities and the institutions responsible for safeguarding public order and security, requiring all those acting on its behalf to demonstrate the same willingness to cooperate should any need arise in the course of their work.

As part of its Organisation, Management and Control Model, Harmont & Blaine adopts specific control protocols designed to prevent offences in dealings with the Public Administration.

7. ETHICS IN RELATIONS WITH EMPLOYEES

7.1 Relations with staff

In its relations with collaborators and employees, the Company adopts behavioural standards geared towards maximum transparency, fairness, equal opportunities and protection, in accordance with defined ethical principles. These principles are consistently applied throughout the recruitment process, the establishment of the employment relationship and personnel management, whilst respecting the privacy and health and safety of workers. Under no circumstances does the Company condone any form of patronage, nepotism or favouritism, and it avoids any form of discrimination against its staff and employees. The Company bases its personnel policies on objective and measurable merit-based considerations.

Harmont & Blaine, in the interests of transparency, undertakes to communicate its personnel management policies to its staff and employees through designated workplaces.

7.2 Health and Safety

Harmont & Blaine aims to maintain the highest standards of hygiene, health and safety, ensuring the necessary preventive measures against illness and accidents in the workplace, thereby protecting its workforce. To achieve this objective, the Company is committed to fostering and consolidating a culture of safety, promoting responsible behaviour on the part of all staff and third parties involved in its operations.

Consequently, the Company provides for continuous monitoring of developments in scenarios and production activities, as well as changes in the associated hazards (risk analysis).

To reduce these risks, the Company defines and implements a programme of measures deemed appropriate to ensure improved safety standards, the introduction of the best production technologies, and the provision of ongoing information, training and operational monitoring.

Everyone, within their area of responsibility, must contribute to maintaining a healthy and safe working environment and ensuring the safety of their colleagues and co-workers.

All Recipients are also required to manage risks preventively, following the appropriate procedures and using personal protective equipment. Should a hazardous situation arise, even if it has not resulted in injury to persons or damage to property, it must be reported immediately to one's line manager so that it may be brought to the attention of the Health and Safety Service and its Manager in order to assess whether further countermeasures are necessary or whether those already in place are sufficient.

In particular, with regard to the protection of health and safety in the workplace, Harmont & Blaine:

- implements the necessary measures to protect the health and physical well-being of its employees and contractors, adopting organisation models geared towards the continuous improvement of workplace safety and health;
- adheres to the principles of workplace health and safety in the organisation of work, the design of workstations and the selection of work equipment;
- also complies with current safety regulations;
- is committed to eliminating risks and, where this is not possible, minimising them in accordance with the knowledge acquired through the technological process;
- to implement its workplace safety policy, ensures the continuous training and awareness-raising of its management and all staff on safety issues, committing to applying and promoting a culture of safety.

Each Recipient is required to exercise the utmost care in the performance of their duties, strictly observing all safety and prevention measures, in order to avoid any possible risk to themselves, their colleagues, collaborators and the entire community.

Recipients **must:**

- take care of their own safety and health and that of other people present in the workplace who may be affected by the consequences of their actions or omissions, in accordance with their training and the instructions and resources provided by the Employer;
- comply with the provisions and instructions issued by the Employer;
- properly use machinery and equipment, means of transport and other work equipment, as well as safety devices;
- use the PPE made available to them appropriately;
- immediately report to the Employer any defects in equipment and devices, as well as any other hazardous conditions of which they become aware;
- undergo the required health checks;
- cooperate with the Employer in fulfilling all obligations imposed by the competent authority or otherwise necessary to protect the health and safety of workers in the workplace.

Recipients **must not:**

- engage in, collaborate with, or cause the occurrence of conduct which, taken individually or collectively, constitutes, directly or indirectly, an offence relating to the health and safety of workers;
- engage in or cause breaches of this Protocol;
- remove or modify without authorisation, or otherwise compromise, safety, signalling or control devices;
- carry out, on their own initiative, operations or manoeuvres that are not within their remit or that may compromise their own safety or that of other workers.

7.3 Key duties of employees

Employees must act loyally in order to fulfil the obligations set out in their employment contract, ensuring the required performance, as well as ensuring compliance with the principles set out in the Code of Ethics.

As part of their duties, every employee and contractor is obliged to use company assets, including hardware and software, in accordance with the prescribed procedures, acting with diligence and adopting responsible behaviour capable of preventing improper use that may cause damage or reduce efficiency, or otherwise conflict with the company's interests or safety.

It is also prohibited to perform duties, even on an occasional basis, whilst under the influence of alcohol, drugs or substances with similar effects.

It is also prohibited, during working hours and in the workplace, even on an occasional basis, to consume or supply, for any reason, narcotic substances whilst on duty.

7.4 Protection of privacy

Harmont & Blaine undertakes not to disclose externally, except in cases provided for by law, without the authorisation of the data subjects, information relating to its employees and third parties, generated or acquired during the course of its business, and to prevent the misuse of such information.

Employees' right to privacy is protected in accordance with standards that specify the information the Company may request from employees, as well as the methods for processing and storing such information.

Any investigation into employees' ideas, preferences, personal tastes and, in general, their private lives is prohibited.

8. EFFECTIVENESS OF THE CODE OF ETHICS AND CONSEQUENCES OF ITS BREACH

8.1 Entry into force of the Code of Ethics and its revision

Harmont & Blaine informs all Recipients of the provisions and application of the Code of Ethics, enjoining compliance with it.

In particular, the Company shall:

- distribute the Code of Ethics to the Recipients;
- interpret and clarify the provisions;
- verify effective compliance;
- update the provisions in line with the requirements that arise from time to time.

The Code will be made available to third parties who are commissioned by Harmont & Blaine or who have an ongoing relationship with the company, via publication on the website.

In order to ensure the effectiveness of the Code, the Company establishes reporting channels through which anyone who becomes aware of any conduct that violates the principles and provisions of the Code of Ethics may report it freely, directly and in complete confidence to the relevant departments of the Company.

Harmont & Blaine shall ensure the confidentiality of the whistleblower's identity and shall protect the whistleblower from retaliation, unlawful pressure, harassment and discrimination of any kind in the workplace for having reported a breach of the Code.

The Company's Board of Directors may review the Code of Ethics at any time, making amendments or additions, including upon recommendation by the Supervisory Body.

Any amendments and/or additions made shall be promptly brought to the attention of all Recipients through appropriate means of communication.

8.2 Adherence to the Code of Ethics

Following any amendment or update to the Code of Ethics, each employee shall receive an updated copy of the Code via appropriate and traceable means of communication, including electronic channels, accompanied by a cover note emphasising the mandatory nature of compliance with the Code; alternatively, they shall be notified of the publication of the updated Code of Ethics on the company's intranet, with a corresponding reminder of the mandatory nature of compliance.

The department responsible for human resources management must keep a record of the distribution of the Code of Ethics and the accompanying communication to all employees.


Each supplier, garment manufacturer, business partner, external consultant and, in general, stakeholders with contractual relationships with the Company shall also receive, via suitable and traceable means of communication, including electronic means, an updated copy of the Code of Ethics, accompanied by a cover note reminding third parties of their obligation to comply with the provisions contained therein.

The department responsible for human resources management and the departments responsible for contract management, in coordination with the Legal & Compliance Department, must obtain from their respective counterparties, upon the conclusion of new contracts, a declaration in which the counterparties confirm that they have received and read the Code of Ethics, as well as their commitment to comply with the provisions contained therein. The aforementioned company departments must retain the declaration at the declarant's position and may, as an alternative to requesting the declaration, include specific clauses directly in the signed contracts.

8.3 Reports

Persons who decide to make a report concerning acts, conduct or events that may constitute a breach of the Model or which, more generally, are relevant for the purposes of Legislative Decree 231/2001 or which may constitute a whistleblowing breach¹ must follow the procedures set out in the Whistleblowing Procedure.

In particular, internal reports may be made in the following ways:

<ul style="list-style-type: none"> ▪ postal address 	<ul style="list-style-type: none"> - at Harmont & Blaine S.p.A., Strada Statale 87 km.16.460, zona a.s.i., 80023 Caivano (NA), Italy – for the attention of the Harmont & Blaine Supervisory Body.
 <p>The internal report must be placed <u>in two sealed envelopes</u>: the first containing the Whistleblower's personal details together with a photocopy of their identification document; the second containing the Report. Both must then be placed in a <u>third sealed envelope bearing the word 'confidential'</u> on the outside, addressed <u>to the</u></p>	<p>In the event of a conflict of interest:</p> <ul style="list-style-type: none"> - at Harmont & Blaine S.p.A., Strada Statale 87 km.16.460, A.S.I. zone - 80023, Caivano (NA), Italy - for the attention of the Legal & Compliance Department of Harmont & Blaine.

Italian Legislative Decree 24/2023 'Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of European Union law and laying down provisions on the protection of persons who report breaches of national law' provides that the following may be the subject of a whistleblowing report:

- a) **offences** falling within the scope of application of the European Union or national acts listed in the annex to Italian Legislative Decree 24/2023 or of the national acts implementing the European Union acts listed in the annex to Directive (EU) 2019/1937, even if not listed in the annex to Italian Legislative Decree 24/2023, **relating to the following sectors: public procurement; services, products and financial markets and the prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; privacy and the protection of personal data; and the security of network and information systems;**
- b) acts or omissions **affecting the financial interests of the European Union as referred to in Article 325 of the Treaty on the Functioning of the European Union**, as specified in the relevant secondary legislation of the European Union;
- c) acts or omissions relating to the internal market, **as referred to in Article 26, paragraph 2 of the Treaty on the Functioning of the European Union**, including infringements of European Union competition and State aid rules, as well as infringements concerning the internal market linked to acts that breach corporate tax rules or arrangements designed to obtain a tax advantage that undermines the object or purpose of the applicable corporate tax legislation;
- d) acts or conduct **that undermine the object or purpose of the provisions** set out in European Union acts in the areas referred to in the preceding points.

Reports Manager, specifying their role

- orally, via a face-to-face meeting with the Reports Manager
 - With the Harmont & Blaine **Supervisory Body**; appointment to be arranged by email at the following address: organismodivigilanza@harmontblaine.com

In the event of a conflict of interest:

- With the **Legal & Compliance Department** of Harmont & Blaine; appointment to be arranged by email at the following address:
 - legal@harmontblaine.com

Harmont & Blaine is committed to protecting those who, in good faith, report suspected or actual breaches of the Code from any intimidation or retaliation, and will take appropriate disciplinary action against those responsible.

8.4 Consequences of breaching the Code of Ethics

Compliance with the rules contained in the Code of Ethics must be considered an essential part of the contractual obligations of employees, pursuant to and for the purposes of Article 2104 of the Italian Civil Code.

Breaches of the provisions of the Code of Ethics and/or of the rules of conduct aimed at preventing the commission of offences under Legislative Decree 231/01 by employees and managers shall therefore be sanctioned in accordance with the law, on the basis of the provisions of the relevant collective agreements in force, with sanctions proportionate to the seriousness of the violation and the recurrence of such conduct.

As regards stakeholders linked to the Company by contractual relationships, a breach of the Code of Ethics may result in the termination or withdrawal from the contract entered into with them, by virtue of the inclusion of specific clauses to that effect in the respective contracts.

In relation to breaches committed by the Company's directors, the Supervisory Body shall report such breaches to the competent bodies (the Board of Directors and the Board of Statutory Auditors so that the necessary or appropriate measures and the initiatives provided for by law may be taken in the competent forums).