

INKSIDE

Italian Surface Inspirations



INKSIDE S.r.l.

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Overview

Inkside was established in 2011 as the result of the common adventure of young designers with over ten years of experience, who over time kept the passion **for research in the field of ceramic design alive**, consolidating and expanding a work group that develops ideas with professionalism, care and practicality.

Its **in-depth knowledge of materials** such as wood, stone, ceramics and marble and their processing enables Inkside to satisfy the requests of customers and to creating new solutions and trends for them and taking **care of every aspect with art, professionalism and quality**.

Honesty, transparency, innovation, social and environmental responsibility are the values in which Inkside identifies itself, the result of a strong and recognized cultural identity. An identity, created by the entrepreneurial style of its founders, which gradually strengthened to become one of the **fundamental resources of the company**.

The growth and development of research means that today, Inkside finds itself operating in a multitude of contexts in continuous and rapid evolution. Because of the complexity of this scenario, Inkside must believe strongly in its culture, **clearly defining the set of values in which the company identifies itself and which it shares**, together with the responsibilities that it entails, both internally and externally.

This "Code of Ethics" is a fundamental tool and part of the process of disclosure and clarification of corporate principles.

Document approved by the Inkside Board of Directors in the meeting of 9 June 2022.

1 - Introduction

1.1 What is “Ethics”?

Ethics or moral philosophy is a branch of philosophy that "indicates the part of philosophy that deals with custom, that is, with human behaviour".

Ethics studies the foundations that make it possible to assign a deontological and normative status to human behaviour, or to distinguish them into good, just, licit, with respect to behaviours deemed unjust, illicit, improper or bad according to an ideal behavioural model (for example a certain morality). Ethics seeks to resolve questions of human morality by defining concepts such as good and evil, right and wrong, virtue and vice, justice and crime¹.

In other words, ethics expresses a set of rules of conduct followed by a person or a group of people both public and private. The word is used in many contexts, and reflects the rules and principles to follow in everyday life. **Therefore, the scope of ethics, even though it refers to an abstract universe (made up of principles and values), is anything but theoretical: it concerns everyday life and translates into rules of conduct.**

According to the words of the philosopher Immanuel Kant, “ethical behaviour” means the acts of an individual inspired not by fear of punishment or by opportunistic hope of rewards, but rather by his own consciousness “in such a way to treat mankind, either himself or the others, as an end and never as a mere means to achieve an end”.

1.2 Business ethics

When the concept of ethics shifts from individual actions to a broader organizational and business environment, the concept of individual responsibility and awareness is inevitably linked to that of "**Corporate Social Responsibility**".

For Inkside, Corporate Social Responsibility means meeting the customer's needs and knowing how to manage the expectations of other Stakeholders², such as staff, suppliers and the local community at the same time. Corporate Social Responsibility indicates the voluntary integration of the company’s social and ecological concerns in its business operations and in its relations with Stakeholders.

¹ Taken from "Wikipedia", the free encyclopaedia

² Stakeholders are all those with a specific interest in Inkside and therefore interested in the good performance of the company. These include, for example: company officers and external collaborators, employees, customers, suppliers, competitors, public administration, purchasers of products, the community, local communities and mass media.

In other words, the aim of Inkside is to pursue its business with **respect for all living beings and the value of inanimate objects** as the final objective of its actions and not as a means to achieve profit.

1.3 The Code of Ethics

The Code of Ethics applies to all of us, as **Recipients**³, wherever we operate and in whichever way we contribute to creating value for the company.

The primary objective of the Code of Ethics is to make the company's values commonplace and widespread at all levels, ensuring that anyone, whenever a decision has to be made, clearly remembers that it is not only their own interests, rights and duties that are at stake, but also those of others, thereby integrating the moral and business spheres, the individual and corporate responsibilities and the personal sphere and that of the company: or rather **translating reasoning into concrete ethical action**. In other words, we must be aware that the well-being and respect for all must always and explicitly be taken into account at every moment in our daily activities.

This document is not intended to increase compliance with the law or the reputation of Inkside because **legal responsibility, compliance with the law and fairness – as the quality of our services – are an essential condition for the very existence of the company** and therefore cannot be considered the objectives of a Code of Ethics.

The Code of Ethics also aims to help people identify ambiguous or potentially dangerous situations that may arise during the performance of their duties, but also to identify relationships or conduct that is not perfectly clear and that may damage the Company.

It is one's duty to know the Code of Ethics thoroughly, just as it is a duty to apply it. The reputation and the success of the company are the result of the diligence of each and every one, together.

This Code of Ethics therefore is, and must be, a point of reference for everyday work.

The Code of Ethics is also available in English and Spanish and published on the Inkside website at the following address: <https://inksidesrl.com>

³ The recipients of the Code of Ethics are the company, its administrative bodies, members of the Compliance and/or Supervisory Body (if any) and in any case all its employees, as well as collaborators in any capacity;

1.4 The corporate mission

“Art and quality to take care of every space”.

Inspired by natural materials, atmospheres, light and colour, we strive to find the ideal product, developed to satisfy the requests of our customers, activating development levers for the local areas in which we operate.

We carry out business in Italy and abroad and promote a style of development that is attentive to the sustainability of results over time and to the creation of a virtuous circle based on the trust that arises from the satisfaction of customers and shareholders as well as to a sense of belonging of our collaborators.

Expertise, passion and teamwork are the essence of our company.

We compete fairly on the market and are prepared to cooperate with other business partners whenever necessary to strengthen overall capacity for growth, always oriented towards new environments with real commitment and passion.

2 - Ethical and General Values

2.1 Reference values

Compliance with the law, regulations and statutory provisions, ethical integrity and fairness are a constant commitment and duty of all Inkside personnel and characterize the conduct of the entire organization.

Inkside is based on the protection and promotion of human rights, the inalienable and basic rights of human beings and the basis for building societies founded on the principles of equality, solidarity, repudiation of war and for the safeguard of civil, political, social, economic and cultural rights and for the so-called third generation rights (right to self-determination, peace, economic and social development and environmental protection). Inkside protects individual freedom, in all its forms, and repudiates all kinds of discrimination, violence, corruption (in all forms in relation to any public or private party) and forced or child labour. Particular attention is paid to the recognition and protection of the dignity, freedom and equality of human beings, employment protection, the right to form or join a trade union, health, safety, the environment and biodiversity, as well as the system of values and principles regarding transparency, energy efficiency and sustainable development as endorsed by institutions and international conventions.

The business and corporate activities of Inkside must be carried out in a framework of transparency, honesty, fairness, good faith and in full compliance with competition legislation.

Our development strategy aims to create solid and sustainable value from an economic, financial, social and environmental point of view that is built on the trust of all our stakeholders. Inkside intends to be an active part in the sustainable development processes and is committed to creating competitive value for the company, the Stakeholders and for the area in which it operates at the same time.

Our values explain who we are and what we believe in, they guide our actions, characterize our commitment and guide our conduct and that of all those who interact with us.

All **Inkside personnel**⁴, without distinction or exception, adapt their actions and

⁴ "Inkside personnel" means: Inkside's administrative bodies, members of the Compliance and/or Supervisory Body (if any) and in any case all the employees, as well as the collaborators in any capacity;

conduct to the principles and content of the Code of Ethics within the scope of their roles and responsibilities, in the knowledge that compliance with the Code is an essential part of the quality of ones work and professional performance.

Relations between Inkside Personnel, at all levels, must be based on honesty, fairness, collaboration, loyalty and mutual respect. In no way can the conviction of acting for the benefit or in the interest of Inkside justify, even in part, the adoption of conduct that is in contrast with the principles and contents of this Code of Ethics.

2.2 General principles

2.2.1 The principle of equality and non-discrimination

Each stakeholder and all Inkside personnel, whether it be an individual or a group of people, is equally worthy of consideration and respect because they are not just a means for fulfilling the corporate mission, but also a value in themselves, to which the activities of the business are addressed.

By virtue of this principle, we believe conduct that might damage the integrity and dignity of people to be unacceptable, as is discrimination based on preference or arbitrary exclusion or not linked to the importance of the contribution that a relationship with a party may offer or the interest that such a relationship may represent for the achievement of Inkside's corporate mission.

The following cannot therefore constitute criteria for preference or exclusion in themselves: personal characteristics such as gender, sexual orientation, race, nationality or ethnic group, political and religious belief, age, marital status, physical appearance or disability, family or care responsibilities, family or other ties, as well as a personal interest in those who work for the company or a generic advantage for the company that cannot be measured in terms of specific economic costs and benefits.

2.2.2 Integrity

We carry out our daily activities and pursue our goals with honesty, fairness, responsibility and good faith, in the full and true compliance with regulations, professional ethics and the spirit of the agreements signed.

2.2.3 Fairness

We are committed to eliminating all discrimination from our conduct and to respect differences in gender, age, ethnicity, religion, political and trade union membership, sexual orientation and identity, language or different abilities.

2.2.4 Transparency

The principle of transparency is based on the truthfulness, accuracy and completeness of the information both inside and outside the Company. Inkside is attentive to the needs and expectations of its stakeholders. With this in mind, we engage in a continuous dialogue with our stakeholders, informing them clearly, fully and truthfully with the awareness that sharing objectives and results is essential for maximizing value and reducing business risks.

2.2.5 Confidentiality

Inkside ensures the confidentiality of the information in its possession and does not actively search for confidential information, unless expressly authorized by the person whose data is processed, and in any case without prejudice to the limits of the law. All Inkside personnel are also required not to use confidential information for purposes unrelated to carrying out their activities and to maintain the strictest confidentiality regarding any restricted information (confidential, relevant, privileged or likely to become so) learnt during the course of their activities.

We therefore protect the privacy rights of our personnel, our customers, our suppliers, our business partners and all those with whom we establish a relationship, using personal data⁵ only for specific and appropriate purposes.

2.2.6 Respect for and protection of Human Rights

We carry out business in compliance with the dignity of people and human rights and we require the same commitment from all Inkside personnel. We ensure an inclusive work environment that values uniqueness and diversity as fundamental resources for the development of humanity.

2.2.7 Employment protection

Inkside guarantees workers freedom of association and recognises the right to

⁵ "Personal information" is all information that identifies or that can directly or indirectly make an individual identifiable and that can provide information regarding his/her characteristics, habits, lifestyle, personal relationships, economic situation, the distinguishing elements of his identity, etc., and those relating to criminal convictions and offences (e.g. criminal records and pending charges). Personal data includes so-called "sensitive data", such as personal and contact information, information related to ethnic or racial origin, personal, religious and philosophical or other beliefs, political opinions and membership of parties, trade unions, associations or organizations of a religious, philosophical, political or trade union nature, as well as personal data that could reveal ones state of health and sex life.

collective bargaining. It undertakes not to use, even indirectly, forced, compulsory labour or child labour. It rejects any discrimination based on age, gender, sexuality, state of health, race, nationality, political opinions and religious beliefs; it rejects any form of discrimination in its personnel selection policies and in the management of human resources. Inkside undertakes to prevent any form of mobbing and exploitation of work, both direct and indirect, and to recognize merit, work performance and professional potential as the determining criteria for wage and career development.

2.2.8 Value of individuals

The value of individuals guides our exchange of ideas and we use it as a tool to continuously improve our relationship with all of our stakeholders.

2.2.9 Moral integrity of the individual

The company undertakes to protect the moral integrity of the Recipients and all Inkside personnel by providing working conditions that respect individual dignity, as well as safe and healthy work environments. Conduct aimed at enticing Inkside personnel to break the law, to act against the Code of Ethics or to adopt conduct that infringes the principle of non-discrimination will not be tolerated under any circumstances.

2.2.10 Relations with customers

Relations with customers are based on the full satisfaction of their needs with the aim of creating a solid relationship based on the principles of fairness, honesty, efficiency and professionalism.

We believe that customer satisfaction is based on values such as:

- **Attention:** identifying needs, even if unexpressed, developing listening channels and building a relationship of mutual trust;
- **Credibility:** live up to all commitment made by behaving consistently with what has been agreed;
- **Transparency:** informing the customer about the service offered in order to make him aware of the choices he can make;
- **Flexibility:** adapt quickly to dynamically evolving needs;
- **Courtesy:** treating customers with respect and with the awareness that their satisfaction is vital for the well-being of the company.

2.2.11 Teamwork and collaboration

We work with passion, we believe in team spirit and we make use of everyone's skills. We perceive collaboration as a fundamental factor for building solid and lasting relationships through which we can express our potential and achieve company objectives.

2.2.12 Relations with shareholders

We make sure that the value of all shareholders' capital invested in the company is safeguarded and increases in a sustainable manner. We guarantee equal information and the utmost attention to all shareholders, without any discrimination or preference.

2.2.13 Relations with Stakeholders

Relations with Stakeholders, at all levels, must be based on criteria and conduct of correctness, collaboration, loyalty and mutual respect. Inkside considers the following to be stakeholders: partners / shareholders, corporate officers and external collaborators, employees, customers, suppliers, competitors, public administrations, purchasers of products, society, local communities and mass media.

2.2.14 Value of resources

The Company undertakes to enhance its resources in order to achieve corporate aims.

2.2.15 Environmental protection

Inkside undertakes to use caution and adopt a preventive approach towards the environment and its biodiversity in all its business activities; to promote initiatives aimed at greater corporate environmental responsibility; to develop the use of environmentally friendly means and technologies. To this end, Inkside undertakes to comply with the environmental legislation and regulations in force in each country in which it carries out business.

2.2.16 Correctness and fairness in the management of contractual relationships

Anyone acting in the name and on behalf of Inkside must not take advantage of any contractual loopholes or unforeseen events, basing their actions on fairness, equity and good faith.

2.2.17 Fairness in the event of potential conflicts of interest

Inkside recognizes and respects the right of its personnel to make investments and to participate in businesses or other activities outside those carried out in the interest of Inkside, provided that these activities are permitted by law, compatible and in any case do not conflict with their obligations towards Inkside.

When carrying out company business, situations where the persons involved are, or may potentially be, in conflict of interest must always be avoided. By this, one means both the case in which a Recipient, or a direct stakeholder, as the case may be, pursues an interest other than that of the company and the balancing of the interests of the shareholders or benefits "personally" from the business opportunities of Inkside, and when the representatives of the direct stakeholders act in contrast with the fiduciary or institutional duties linked to their position.

2.2.18 Fairness of authority

When establishing hierarchical relationships within the Company, anyone in a position of authority undertakes to exercise their role in a fair and correct manner, avoiding abuse of any form.

In particular, Inkside guarantees that the performance of an authority role respects the dignity and independence of Inkside personnel and that decisions regarding the organization of the work are orientated towards safeguarding this.

2.2.19 Diligence and accuracy in the performance of duties and contracts

Contracts and work assignments must be performed in good faith and as established by the parties.

2.2.20 Safeguarding our reputation

Our reputation is the consideration and social memory that the stakeholders have of the company and its activities. It is a determining factor of our history, our conduct and the results we achieve. All the recipients of this Code of Ethics have to undertake to protect the reputation of Inkside by acting in compliance with the principles of the Code of Ethics and to safeguard our relational capital, considering the expectations of the stakeholders.

Each recipient of the Code undertakes to use the Inkside brand consistently with the corporate *mission* and to always associate it with activities and events that are in line with the Inkside values expressed in this Code of Ethics and to oppose its improper or unauthorized use.

All recipients of the Code are aware that everything they do on social networks is in the public domain and must not, even potentially, damage Inkside's reputation.

2.2.21 Transparency and completeness of information

All Recipients and all Inkside employees are required to provide complete, correct, transparent, comprehensible and accurate information, so that in relations with the Company, all those involved are able to make independent and informed decisions. When establishing contractual relationships, Inkside ensures that the contractor is informed about the conduct that it expects to be adopted in a clear and understandable way.

2.2.22 Corporate information and intellectual property

All company information, unless previously approved for external disclosure, must be considered confidential and therefore classified and protected. All Recipients of this Code have the responsibility to recognize, protect and defend Inkside's intellectual property and respect that of third parties.

2.2.23 Fair competition

Inkside promotes fair competition, refrains from collusive, predatory conduct and abuse of a dominant market position. It undertakes to report all practices aimed at limiting fair market competition to the competent authorities using appropriate reporting tools.

2.2.24 Responsibility towards the community

Inkside is aware of the influence that its business activities may have on the conditions and general well-being of the community and therefore carries out its activities in respect of the law and the principles contained in the Code of Ethics.

2.2.25 Use of financial resources

Inkside requires all subjects who use its financial resources to act according to criteria based on legality and correctness.

2.2.26 Bribery and corruption

Inkside undertakes to implement all the necessary measures to prevent and

avoid bribery and corruption.

It is prohibited for sums of money to be paid or for other forms of corruption to be used to provide direct or indirect benefits for the company.

3 - Rules of conduct

3.1 Rules of conduct in business management

3.1.1 Conducting company business

When carrying out business, Inkside manages company assets by primarily safeguarding them in the interests of its partners / shareholders and does not engage in conduct that could damage their integrity and ensures that the corporate assets are used for purposes related to fulfilling corporate objectives.

Inkside has a transparent conduct towards its shareholders' meeting regarding company results and, more generally, towards all managerial, administrative and organizational decisions made by the relative internal bodies.

3.1.2 Use of computer systems

All Inkside employees and/or collaborators are responsible for the safety and care of the computer systems used and are required to comply with the regulatory and corporate provisions in force and the conditions indicated in the licence agreements.

Except as required by law, it is considered misuse of corporate assets to use networking connections (the Internet) for purposes other than those strictly related to the performance of duties/work assignments.

Each employee is also required to take the necessary steps to prevent the possibility of committing offences through the use of IT tools.

3.2 Rules of conduct in relations with employees

On accepting the offer of employment, the employee undertakes to comply with the Code of Ethics and to behave in line with the principles of loyalty, impartiality, integrity and honesty. The employee must avoid any action or conduct that infringes or may be deemed as having infringed the provisions of the law and the Code of Ethics.

3.2.1 Personnel selection

The evaluation of prospective employees is made based on matching candidate profiles to company requirements and in compliance with the principle of equal opportunities for all applicants. The information requested is strictly related to

verifying that he/she possesses the professional and psychological-aptitudinal characteristics being sought and in respect of the privacy and opinions of the candidate and the principle of non-discrimination.

3.2.2 Terms of employment

Personnel are hired with a regular employment contract; no form of illegal employment is tolerated.

Each employee receives clear and precise information regarding:

- the characteristics of their role and duties to be performed;
- matters regarding to statutory and remunerative aspects as regulated by the applicable collective bargaining agreement;
- regulations and procedures to be adopted in order to avoid possible health risks associated with their work;
- the Code of Ethics.

At the time the new employee is hired, he/she is informed that this Code is available on the Inkside website and a copy of the Code of Ethics is signed for their express acceptance. The signed copy must be given to the Chairman of the Board of Directors, who will place it in a specific file.

3.2.3 Personnel management

Without prejudice to the general rules set out in this Code of Ethics, the following principles must be followed regarding personnel management:

- a. Inkside must avoid any form of discrimination against its employees and in the personnel management and development processes, as during personnel selection, the decisions made are based on matching expected profiles with those of employees and/or considerations of merit;
- b. suitability for roles and assignments is also established by considering expertise and ability. Flexible forms of work organisation are also established to facilitate the management of periods of maternity, as well as child care in general, wherever such an approach is compatible with the overall efficiency of the work;
- c. managers use and optimise all of the professional skills present in the company; Inkside promotes, as far as possible, the professional development, also through the targeted training of employees;
- d. Inkside makes information and training tools available to all its employees with the aim of increasing specific skills and preserving the professional value of its staff;
- e. attention to the opinions of collaborators, consistent with company needs, allows managers to formulate final decisions. The employee must, however, always contribute to implementing the established activities.

3.2.4 Health and safety

Inkside undertakes to comply with current occupational health and safety regulations. To this end, Inkside undertakes to spread and consolidate a safety culture by increasing risk awareness and promoting a responsible conduct by all its employees and collaborators in general. Inkside also implements appropriate and targeted preventive measures to safeguard the health and safety of employees and collaborators in general.

These objectives are achieved through:

- the introduction of a risk and safety management system;
- training and communication interventions;
- drawing up specific operating procedures and quality systems.

3.2.5 Personal data protection

The personal data of employees and collaborators in general is safeguarded by adopting standards that specify the information that Inkside requires from the various Recipients, the methods of processing and storage, which excludes any investigation into the ideas, preferences, personal tastes and private life of each employee. These standards also prohibit, except where required by law, the communication or disclosure of personal data without the prior consent of the individual and establish the rules whereby each employee may check that the data protection regulations have been applied. When processing personal data, Inkside adopts all the necessary precautions and obligations required by law.

3.2.6 Integrity and protection of the individual

Inkside undertakes to protect the moral integrity of its employees and collaborators by guaranteeing the right to working conditions that respect the dignity of the individual. For this reason, it protects workers from acts of psychological violence, and opposes any conduct that is discriminatory or harmful towards the person and his/her beliefs and preferences.

Inkside employees who believe they have been harassed or discriminated against for reasons related to age, gender, sexuality, race, state of health, nationality, political opinions and religious beliefs, etc., can report the incident to the Administrative Body, which will assess whether the Code of Ethics has been infringed.

3.2.7 Duties of Employees

Without prejudice to compliance with the regulations contained in this Code of Ethics, the duties of Inkside employees comply with following principles:

- a. Employees must act loyally in order to comply with the terms of the employment contract and the provisions of the Code of Ethics, ensuring performance of the services required;
- b. Employees must understand and implement company policies regarding information security that ensures their integrity, confidentiality and availability. Employees are required to prepare documentation using clear, objective and exhaustive language that allows checks to be carried out by colleagues, managers or third parties authorised to request them;
- c. Inkside employees are required to avoid situations that could give rise to conflicts of interest and not to personally take advantage of any business opportunities that they may become aware of while carrying out their duties for the company; by way of example, the following situations may lead to a conflict of interest:
 - holding a management role within the company and at the same time developing economic interests with suppliers, customers or competitors, including through family members;
 - being responsible for supplier relations within the company and working for suppliers, either personally or through a family member, at the same time;
 - accepting money or favours from individuals or companies that have or intend to start a business relationship with the company;
- d. even if there just appears to be a conflict of interests, employees are required to inform the Administrative Body that will assesses whether a conflict of interest actually exists and provides information on how to proceed;
- e. employees are also required to inform the Administrative Body of situations of potential conflict of interest, even when these may arise in relation to activities carried out by him/her outside working hours;
- f. each employee is required to act diligently to safeguard company assets, through responsible behaviour and in line with the operating procedures that govern their use and accurately document their use. In particular, each employee must:
 - use the assets entrusted to them conscientiously and sparingly, paying particular attention to the management of the company's financial resources in his/her possession;
 - avoid the improper use of company assets that may cause damage or compromise efficiency, or otherwise conflict with the interests of the company;
- g. each employee is responsible for safeguarding the assets entrusted to them and is required to inform Inkside immediately of any risks or events that may

- damage the Company;
- h. with regard to information technology applications, each employee is required to avoid using Inkside information systems to distribute personal and confidential information and any materials belonging to the company.

Those who hold positions of responsibility in the Company are required to set an example to all employees, to encourage them to comply with the Code and to respect the regulations.

Employees who, during the normal course of their work, become aware of confidential information relating to the Company may not use it for personal, private or economic purposes. Such uses, in addition to being a moral and ethical issue, are punishable by law.

3.2.8 Rules of conduct for external relations

Inkside recognizes the fundamental role of clear and effective communication in external relations.

In general, the company's external communications must be based on the respect for the right to information and under no circumstances is it permitted to disclose untruthful information. All communications comply with the laws, rules, and professional conduct and must be carried out with clarity, transparency and in a timely manner, safeguarding any confidential information and trade secrets.

Employees responsible for disclosing corporate information outside the company in the form of speeches, participation at conferences, publications or any other form of presentation, must comply with company regulations and be given prior authorization from top management or a delegated person.

3.2.9 Health, safety and the environment

Inkside is aware of the importance of guaranteeing the best health and safety conditions in the workplace and undertakes to spread and consolidate a safety culture by increasing risk awareness, promoting and requiring a responsible conduct by all its employees, implementing appropriate preventive measures not only to safeguard the health and safety of its staff, but of everyone who enters the company premises.

All Inkside activities and those of the individual employee must be oriented towards ensuring safety in the workplace and full compliance with the rules and obligations contained in safety legislation as well as compliance with all the measures required by company procedures and regulations.

Each Inkside employee must not expose other employees to unnecessary risks that could harm their health or physical safety.

The company, in carrying out its business, places a high value on and implements concrete measures to ensure the best working conditions for its staff by undertaking to:

- comply fully with applicable legislation and to follow the objectives that the company has decided to pursue;
- prevent accidents and occupational diseases including a commitment to continuous improvement of the workplace health and safety management system and its performance;
- create and maintaining a safe work environment, compatible with the needs of individuals and equipped with suitable equipment;
- educate and train personnel about the risks and emergencies they might encounter and the protective equipment available;
- extend protection to those who are associated with the company, in terms of safety and health risks related to activities that fall within Inkside's responsibility;
- preventing situations of risk and injury or damage to people, property and environmental resources due to any reasonably foreseeable cause and which are the responsibility the company;
- allocate the necessary resources and make them available with the right level of expertise.

Everyone who works for Inkside is responsible for the good management of health, safety and the environment and are required to actively contribute to maintaining an optimal standard of company safety. They should refrain from illegal or otherwise dangerous conduct and report any activities carried out by third parties to the detriment of Inkside's human resources to their supervisor or the body of which they are a member.

In any context that requires special attention to personal safety, it is mandatory comply with the instructions provided by Inkside and to refrain from conduct that could put one's own safety or that of others at risk and to promptly report any situation that poses a danger to personal safety or that of third parties to your supervisor.

3.2.10 Staff remuneration policy

The remuneration policy adopted for all Inkside personnel – including variable components – is based on fairness, merit and sustainability of results. The guidelines used to define the remuneration policy are based on objective aspects and parameters derived from the assessment of organisational roles, performance and potential, and aim to establish an integrated system to support

management and professional development.

Transparency is an integral part of the remuneration and incentive systems for employees at all levels, with a view to promoting competitiveness and attracting and retaining the best expertise and professionalism within Inkside.

3.2.11 Listening and dialogue

Inkside believes that listening and dialogue are the foundation of relationships that generate trust. As such we:

- promote the strategic role of internal communication to allow Inkside personnel to participate with more awareness in corporate life;
- base communication on criteria of correctness, completeness, simplicity and transparency;
- undertake to develop, in those who have positions of responsibility, a specific perceptiveness toward the needs of employees and to teach them to value their suggestions and differences of opinion as opportunities for company growth and improvement.

3.2.12 Gifts, presents and benefits

It is expressly prohibited for employees to offer or receive gifts (both directly and through third parties) that could be interpreted as being outside standard commercial or polite practice or that could be construed as aimed at obtaining preferential treatment in carrying out activities connected to the Company.

If an employee receives offers and/or requests for gifts or benefits - except for gifts for commercial use or of modest value – he is required to immediately inform his contact person or the Administrative Body that is responsible for evaluating the directives and parameters to adopt for managing the “*situation*”.

In countries where it is customary to offer gifts to customers or others, you may do so when the gifts are of an appropriate nature and of modest value, but always in accordance with the law. This must never be interpreted as seeking favours.

Employees must refrain from unlawful practices and commercial practices or ethical codes of companies or entities with which they have relations that do not comply with current regulations.

3.2.13 Conflict of interest

To ensure maximum transparency, Inkside and its employees undertake not to place themselves in situations of conflict of interest with employees of any party

and their family members. In particular, employees and other Inkside personnel or entities that have the objective possibility of influencing the decisions of the Company, must, at all cost, avoid using, even implicitly, their position to influence decisions in their favour or in the favour of relatives, friends and acquaintances for purely personal purposes of whatever nature they may be.

3.2.14 Personal data protection

The personal data of employees is safeguarded by adopting standards that specify the information that the company requires and the relative methods of processing and storage, which excludes any investigation into the ideas, preferences, personal tastes and private life of each employee. These standards also prohibit, except where required by law, the communication or disclosure of personal data without the prior consent of the individual and establish the rules whereby each employee may check that the data protection regulations have been applied. When processing personal data, the company adopts all the necessary precautions and obligations required by law.

3.2.15 Integrity and protection of individuals

Inkside undertakes to safeguard the personal integrity of its employees by guaranteeing the right to working conditions that respect the dignity of the individual. For this reason, it protects workers from acts of psychological violence, and opposes any conduct that is discriminatory or harmful towards the person and his/her beliefs and preferences.

Inkside employees who consider themselves a victim of harassment or to have been discriminated against in relation to their age, gender, race, state of health, nationality, political opinions or religious beliefs, may report the matter to the company's Administrative Body which will assess whether the Code of ethics has been infringed.

3.2.16 Sanctions for employees

The provisions of this Code of Ethics are an integral part of the contractual obligations assumed by employees (blue-collar, white-collar, and managerial).

Compliance with the provisions of this Code of Ethics is an essential part of the contractual obligations of all employees pursuant to article 2104 of the Italian Civil Code⁶.

⁶ Art. 2104 of the Italian Civil Code: The employee shall use the diligence required by the nature of the service, the interests of the company and the higher interests of national production. He/she must also

Failure to comply with the provisions of the Code of Ethics may constitute a breach of contractual obligations with legal consequences, including compensation for damage in compliance with article 7 of the Italian Civil Code, law N. 300⁷ of 20/5/1970, law n. 604⁸ of 15/7/1966 and subsequent amendments and additions on individual dismissals as well as collective bargaining agreements as well as the applicability of art. 2119 of the Italian Civil Code⁹ which provides for the possibility of dismissal for just cause.

3.3 Rules of conduct with partners / shareholders

3.3.1 Principles of conduct in shareholder relations

Inkside has adopted the one-tier governance system in which the functions of management and control are carried out by the Board of Directors.

Inkside pursues principles of good *governance* in the operating rules of the Corporate bodies and the conduct of directors and management.

Inkside undertakes to respect and promote the rights of its partners / shareholders by safeguarding their investment and maximizing the value of the company.

3.3.2 Creation of value and relationships with partners / shareholders

One of Inkside's objectives is to create value for the partners / shareholders. In order to provide an adequate return for the risk taken by the shareholders investing their own capital, the company makes every effort to ensure that its economic and financial performance both safeguards and increases the value of the company.

The Company must provide the partners / shareholders with all the relevant information available so that they can freely and consciously make their own decisions. To this end, we ensure continuous and constructive dialogue with the

comply with the provisions for the performance and execution of work issued by the employer and the latter's associates he/she hierarchically reports to.

⁷ Regulations on the protection of the freedom and dignity of workers, trade union freedom and trade union activity in the workplace and employment regulations (Workers' Statute);

⁸ Regulations regarding individual dismissals;

⁹ Article 2119 of the Italian Civil Code: Each party may withdraw from the contract before its expiry date if it is a fixed term contract, or without notice, if the contract is open-ended, for reasons that do not allow the relationship to continue, even temporarily. If the contract is open-ended, the employee who withdraws for just cause is entitled to the indemnity indicated in the second paragraph of the previous article. The compulsory administrative liquidation of the company does not constitute a just cause for terminating the contract. The effects of judicial liquidation on employment relationships are governed by the crisis and insolvency code.

partners / shareholders, paying attention to their needs and taking into consideration legitimate concerns.

Communications with partners / shareholders must be truthful, clear, and complete. Information and communications addressed to partners / shareholders are disclosed by top management or by persons expressly delegated by them.

3.3.3 Value of resources

Inkside undertakes to enhance its resources for the purpose of achieving corporate objectives.

3.4 Rules of conduct for external relations

3.4.1 Information and accounting

All information and dialogue with stakeholders must be clear, transparent, timely, complete and consistent in compliance with the right to information. All employees are required to collaborate so that information regarding business activities is duly and timely recorded in the company account books and that it is truthful, accurate, complete and verifiable.

Each operation and transaction must be correctly recorded, authorised, verifiable, legitimate, consistent and congruent. It is the duty of each employee to ensure that the supporting documentation can be easily traced and filed logically.

No false or factitious entries should be entered in the Company's account books for any reason. No employee may engage in activities that can cause such a wrongdoing, even if at the request of a chief supervisor.

3.4.2 Principles of conduct for customer relations

We believe that customers should always be at the centre of our attention and that only through ongoing dialogue can we truly understand their actual expectations and maintain excellent relations.

We believe that enduring relationships based on trust require communication that allows customers to have a clear understanding of the features and value of all the products and services offered to them and/or purchased by them.

We safeguard our customers by earning their trust every day, acting ethically and offering the most innovative and highest quality products and services.

We operate in national and international markets, basing our commercial policies and our strategic choices on *best practices* and the principle of professional loyalty towards customers.

We ensure that our customers and consumers have complete and transparent information when deciding to enter into a relationship with us and are committed to ensuring that the characteristics of our products and services match the information provided in order to allow conscious choices to be made.

We ensure that our customers are safeguarded not only during the "first contact" with the company, but also for the entire duration of the contractual relationship. We are committed to providing all the necessary support to guarantee the correct continuation and/or completion of the contractual relationship, also through paying constant attention to suggestions and complaints from customers.

The Administrative Body, employees and/or collaborators of Inkside undertake not to permit and not to engage in any form of corruption, including payments or other forms of benefits conferred personally to directors, employees or the contact persons of customers that are aimed at improperly influencing corporate decisions and causing damage.

3.4.3 Principles of conduct in relations with suppliers and external collaborators

We believe that listening and sharing ideas with our suppliers fosters the ongoing improvement of those relationships, reinforcing them and generating reciprocal value through:

- an approach based on trust that involves the suppliers and external collaborators in a proactive role and that leads them to promptly reporting issues that require a common solution to be found;
- measuring the level of satisfaction of our suppliers and external collaborators, identifying areas for improvement, especially regarding transparency, communication and compliance with terms of payment.

We believe that a clear and transparent approach contributes to maintaining enduring relationships with our suppliers and external collaborators. We are convinced that integrity is a fundamental prerequisite of the relationship and therefore:

- our choice of suppliers and external collaborators is based on clear and proven criteria applied through an objective and transparent procedure;
- we are committed to company policies that base relationships on the utmost fairness, especially in the management and conclusion of contracts, thereby avoiding situations of conflict of interest, even potential ones;
- in the specific case of professional consultancy, we base our decisions on

- criteria of professionalism and expertise and avoid conflicts of interest, even potential ones;
- we are committed to making our policies on relations with suppliers and external collaborators known;
 - we seek commercial agreements with suppliers and external collaborators who demonstrate sensitivity to corporate and social responsibility issues.

Acting with integrity towards our suppliers and external collaborators means that employees who are responsible for choosing a supplier of goods or services have to evaluate offers objectively, acknowledge equal opportunities to all those taking part in the selection, and make their decision based only on quality, price, reliability, expertise and professionalism.

Inkside employees and collaborators cannot accept or solicit personal benefits that may conflict with the above-mentioned selection criteria from an actual or potential supplier, or give even the slightest impression that such benefits may affect or impair their judgement.

In addition to proven professionalism, we seek the commitment of our suppliers and external collaborators to sharing our principles. We promote socially responsible conduct and business practices and expect our suppliers and external collaborators to operate in line with our high standards of respect for Human Rights and environmental protection.

3.4.4 Principles of conduct for relations with the Public Administration

Inkside's relations with national, EU and international Institutions, as well as with public officials or public servants, or bodies, representatives, agents, members, employees, consultants, officers of public functions or services, public institutions, public administrations, public entities including economic entities, local, national or international public bodies or companies ("Public Officials") are held in accordance with current regulations and on the basis of the general principles of fairness and loyalty.

Relations with Local, National, Community and International Public Institutions is restricted exclusively to the designated and authorized roles. This is why it is advisable to collect and file the documentation regarding the methods by which Inkside comes into contact with the above-mentioned Institutions.

Our institutional relations with the various agencies of the State and/or with international organisations are aimed exclusively at forms of communication for assessing the implications of legislative or administrative activities carried out by Inkside.

4 - Mechanisms for implementation, internal distribution and governance

The mechanisms for implementation, internal distribution and governance described below are aimed at achieving the following objectives:

- integration of company strategies, policies and procedures with the ethical principles and values through maximum sharing and distribution of its contents;
- monitoring of the knowledge and awareness of its contents.

4.1 Implementation of the code of ethics

The Code of Ethics and any future amendments shall be approved by the Board of Directors and brought to their attention for the related decisions.

4.2 Revision of the code of ethics

The revision of the Code is approved by the Inkside Board of Directors on the proposal of the Chief Executive Officer in agreement with the Chairman.

The proposal is formulated taking into account the assessment of the stakeholders with reference to the principles and content of the Code, also promoting their active contribution and reporting any shortcomings.

4.3 Scope of application of the Code of Ethics

The recipients of the Code of Ethics are all the company officers¹⁰, without exception, and all those who, directly or indirectly, permanently or temporarily establish relationships with Inkside and work to pursue its objectives.

In business relationships, the parties must be informed of the existence of rules of conduct and must comply with them.

4.4 Communication and training

It is the duty of the Chairman of the Board of Directors to ensure that the Code

¹⁰ The company, its administrative bodies, members of the Compliance and/or Supervisory Body (if any) and all employees, as well as collaborators in any capacity;

of Ethics is brought to the attention of all Recipients and to the maximum extent possible of all parties. To do this, the company prepares specific and appropriate communications (including, for example delivering of a copy of the Code of Ethics to all Recipients and preparing a specific section of the website). In order to promote the correct understanding of the Code of Ethics, Inkside undertakes to organize training courses and information programs for its employees aimed at promoting knowledge of the principles and rules of the Code of Ethics.

A copy of the Code is given to each director, employee or external collaborator at the time of appointment, hiring or the start of the collaboration relationship respectively.

4.5 Reporting to the Administrative Body

All Recipients are required to report situations, facts or acts that, within the company activity that infringe the provisions of the Code of Ethics directly to the Board of Directors, without having to go through the hierarchy.

Details can be sent to the following e-mail address: s.manattini@inksidesrl.com.

4.6 Breaches of the Code of Ethics

The Inkside Board of Directors verifies breaches of the Code of ethics and communicates its findings, together with sufficiently detailed information, so that appropriate measures may be adopted or sanctions applied.

In the event that breaches of the provisions of the Code of Ethics have been established, appropriate sanctions will be adopted in line with the provisions indicated in the national collective bargaining agreements.

4.7 Contractual value of the code of ethics

Compliance with the rules of the Code are to be considered an essential part of the contractual obligations of all Inkside personnel pursuant to and for the purposes of the applicable law.

5 - EFFECTIVE DATE

This Code of Ethics becomes effective upon its approval by the Board of Directors.

INKSIDE S.r.l.

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