



Ethic Code

Croma Catene S.r.l.
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1. INTRODUCTION

Croma Catene (hereinafter also the 'Company') is a member of the Responsible Jewellery Council and has adopted a management system compliant with the guidelines of the Code of Practices 2019 (CoP 2019).

Croma Catene (hereinafter called the "Company"), has adopted this Code of Ethics (hereinafter called "Code") to clearly and transparently define the overall values which must inspire our Company activities.

The Company was incorporated in 1986, by its founder Roberto Cacchiani who, thanks to the support of his family with which he shares his commitment and his innate entrepreneurial capacity, has worked incessantly to build up today's Croma Catene brick by brick. The excellence of the product, reached through high manufacturing standards, high tech machines and an incessant design research, are the factors that have guaranteed the development and growth of the Company to its present size.

The Company manufactures and sells items in silver, chains sold by the meter, finished chains and a vast assortment of creative articles, by means of a highly technological internal production cycle that has a very high technological profile, while keeping the handcrafted characteristics of excellence intact, these constitute the success of its production.

The strengths of the offer to its clients are the wide variety of items, the warehouse with a vast assortment of ready to deliver items, the quality of the product, as well as the traditional confidentiality, professionalism and competence of its human resources who have a marked team spirit and company identification.

The clientele comprises small and medium-sized Italian and foreign companies. An ever growing attention is reserved to the international customers for export operations and for assistance in the development of *custom made* articles, so as to help their penetration in their home markets. In carrying out its activity, the Company pursues the aim of combining profit with competitiveness, with a rigorous respect of professional ethics.

Within the context of an ever growing attention to *corporate governance*, as well as the creation of a company and organizational model that is capable of managing the business risk in an efficient manner, we have deemed that it is appropriate to formalize and disseminate a document that synthesizes the traditional ethical principles which inspire Croma Catene.

2. THE CODE OF ETHICS

Correct, transparent behaviour increases and protects the reputation, credibility and consensus with the public, the authorities and institutions, over time. These are all fundamental aspects for the development of the Company activities, the Code of Ethics contains the references and guiding principles, which are complementary to the juridical obligations and those of self-regulation and which guide the Company's behaviour in continuation and consistency with its mission and its fundamental values. Taking into consideration the variety and diversity of the Company activities and clientele, each behaviour, even if not considered explicitly by the Code of Ethics, must always be inspired by criteria such as legality, transparency, common sense and personal ethics, that are consistent with the values, guiding principles and Company procedures, along with the knowledge that they cannot expose the Company to the regulatory and reputational risks. The Company undertakes to respect its legal obligations, in force in every geographical context and area of activity in which it operates and it undertakes to respect the principles contained in the international conventions safeguarding human rights, work safety, contrasting corruption, fighting organized crime and international terrorism.



3. THE ADDRESSEES

The Code of Ethics indicates the principles, models and rules of behaviour that the Company undertakes to follow in every activity. The principles and the provisions of the Code are binding for the Directors, Auditors, Managers, Staff, Trainees and Collaborators and is applicable to all parties that the Company has relations with, due to supply and consultancy agreements and who work for the Company, whatever kind of relationship ties them to it (Suppliers). The parties mentioned above are hereinafter jointly defined as "Addressees". The Code is brought to the attention of the concerned parties in the forms mentioned in the following point.

4. METHOD OF APPLICATION

The Company has adopted an Organizational, Management and Control Method in accordance with the Law. Dec. 231/01, of which this Code of Ethics is the necessary completion. The Code of Ethics and its eventual subsequent updates are brought to the attention of the Addressees and the public by using at least one of the following instruments:

- Distribution in electronic and/or paper form;
- Company intranet system;
- Publication on the Company website.

The administration structure undertakes to spread the Code of Ethics and to promote compliance to it. In particular each Addressee is obliged to:

- Abstain from behaviour that is contrary to the Code of Ethics, while complying to the body of Company regulations;
- Lead, as much as possible, their collaborators to fully respect the Code;
- Spread this Code to third parties with whom the Company initiates relationships.

The issues concerning the notification of possible violations, the applicable penalty system and the verification activities are dealt with in the above mentioned Organizational, Management and Control Model, in accordance with Law Dec. 231/2001, to which we expressly refer.

5. GENERAL PRINCIPLES

Fairness and Honesty

The Company operates by respecting the Laws in force, the internal regulations and professional ethics. The pursuit of Company interests can never justify conduct that is contrary to the principles of fairness and honesty; for this reason also we refuse all forms of benefits and gifts received and offered that could be intended as instruments aimed at influencing the independence of judgement and behaviour of the parties involved.

All actions, operations and negotiations carried out and, in general, the activities carried out in the execution of work operations are inspired by principles of honesty, professionalism, transparency and loyalty towards the clientele.



Impartiality

In the relationship with counterparties, the Company avoids any form of discrimination based on age, race and ethnic origin, nationality, political opinions, religion, sexual orientation or the interlocutors' health.

Professionalism and highlighting of resources

The Company guarantees the highest level of professionalism in the execution of duties assigned to its collaborators. To this end it highlights the competences and the merit of its resources, while making available the appropriate tools for training, professional updating and development.

Professionalism and enhancement of resources

The Company guarantees the highest degree of professionalism in the execution of the tasks assigned to its collaborators. To this end, it enhances the skills and merit of its resources, making suitable training, professional updating and development tools available.

Confidentiality

The Company guarantees, in conformity with the provisions of the Law, the confidentiality of the information it possesses. The Addressees is prohibited from using confidential information for aims that are not directly connected with the performance of their professional activity.

Transparency and completeness of information

The information that the Company disseminates is true, complete, transparent and accurate, so as to allow the Addressees to make informed decisions.

Quality policy

The application of a quality management system has the main and general strategic objective of obtaining the complete satisfaction of the customer's needs, both those expressed and those hidden, and to maintain a primary reputation in terms of quality.

The way to pursue this goal is to act in advance, analyzing and evaluating the internal and external context in which the company operates, so as to be able to plan preventive actions to contain the risks that may prevent the achievement of the objective.

Maintaining the ISO 9001 certification provides objective demonstration of this strategic direction.

To remain on the market, a competitive service must be offered and to be competitive, it is necessary to continuously improve in professionalism, effectiveness and efficiency, constantly measuring and comparing oneself with clear and tangible objectives.

Without prejudice to the professionalism and competence of the individual components of Croma Catene Srl from which there is no derogation, the customer is constantly the element to which the organization tends.



It is the organization's policy to apply the following strategic lines:

- comply with the laws in force and regulations;
- create and maintain awareness throughout the organization of the importance of meeting the needs of the customer and all interested parties;
- prevent problems, contain risks, exploit strengths and opportunities;
- to make employees responsible for the quality of work individually;
- promote and disseminate continuous quality improvement;
- measure the adequacy and effectiveness of the quality management system through periodic review of the same to also deal with market criticalities;
- arrange, analyze data records and monitor the management system;
- obtain a satisfactory economic result.
- increase customer service, therefore:
 - give continuous assistance during the provision of the service and after delivery;
 - give information, education and training of personnel to quality.

Regarding public or private security forces

We confirm that the role of public or private security forces is to ensure the safety of workers, plants, equipment and property, in accordance with the law, including the law that protects human rights. We do not intend to provide direct or indirect support to public or private security forces who commit abuses or who act in a manner contrary to the law.

Protection of Health

The Company guarantees, with respect to the legislation in force, a work environment that is adequate, from the point of view of the safety and health of the people. The Addressees scrupulously respect the safety and prevention measures in force.

Environmental Protection

The Company is sensitive to the protection of the environment as a primary asset. For this purpose it guides its choices to guarantee the compatibility between economic initiatives and environmental needs in respect of the laws in force.

Protection of Copyright and Industrial Property

The Addressees must operate while respecting the law, the regulations and internal rules in matters concerning the protection of copyright and industrial property. In particular:

- It is prohibited to acquire and use IT instruments lacking User Licenses;
- It is prohibited to acquire or promote the circulation of goods for which the originality and the full respect of industrial property is not proven.

In the execution of their duties, it is prohibited to make available to the general public any intellectual property works that are protected, or of parts of them, without the necessary authorizations.



Use of Company assets

The management and use of Company assets must be inspired by integrity, correctness and responsibility; in particular, all personnel are bound to respect and safeguard the Company property, as well as to impede its fraudulent or improper use.

The IT instruments that are available to the personnel must be used exclusively to better carry out their work activities and with methods that do not cause prejudice to the Company and its information systems. In particular, it is prohibited to:

- Tamper with the protective systems of the Company IT systems and those of any entity with which the Company has work relationships,
- Fraudulently create / modify / cancel Company data and/or that of third parties,
- Illegally access third party information networks,
- Install appliances for the interception of third party communications,
- Spread, by means of the Company network, illegal programs or viruses.

6. FIELD OF APPLICATION

This Code of Ethics contains behavioural principles which traditionally the Company considers its own.

Relationship with Clients

The Company undertakes to create and develop relationships of trust and mutual and durable satisfaction with the clients. The contractual relationships and communications to clients are based on principles of correctness, professionalism, transparency and inspired by a greater collaboration and cannot be intentionally aimed at the violation of the regulations in force.

The clients are informed in a clear and complete way about the products and services offered and the relative conditions that are applied, facilitating understanding and informed choices.

The Company avoids holding relationships with parties implicated in illegal activities.

The eventual complaints, whether they refer to products or problems having a commercial character, are managed with professionalism and they furnish opportunities for improvement to overcome conflicts and improve the trust and satisfaction of the clients.

Recording Company events

For all operations, adequate support documentation is stored in the records so as to allow:

- The easy and punctual accounting registrations;
- The identification of the various levels of responsibility and separations of duties;
- The accurate reconstruction of the operation, also so as to reduce the probability of material errors or those of interpretation.

Each registration reflects what is in the support documentation. It is the duty of all the Addressees to act so that this documentation is easily traceable and organized according to logical criteria.

The Addressees who are informed of omissions, falsifications, negligence of the accounting office or of the documentation on which the accounts registrations are based, must refer the facts to their superiors or to the Supervisory Body. The Company ensures the correct execution of the control or



revision activities that are legally attributed to the shareholders, the Board of Auditors, the Supervisory Body, as well as the free and correct formation of the will of the Shareholders' meeting.

Relationships with the Personnel

The Company believes that the respect of the personality and the dignity of each collaborator is fundamental for the development of a work environment that inspires a mutual trust and loyalty.

Personnel management policies

The personnel is treated in a respectful and fair manner, supported in their professional development and rewarded for the results they obtain. The search for and selection of personnel is carried out on the basis of objective criteria of competence and professionalism, while guaranteeing to all, an equal opportunity for integration and professional evolution based on merit. We favour a positive work climate, which enhances the individual and interpersonal relations, while favouring the reinforcement of the feeling of belonging and a team spirit.

We search for the greatest coherence between the Company aims and the needs of each employee, in a perspective of flexibility in the management of human resources.

No form of discrimination or harassment is tolerated. The violation of the Code of Ethics is a reason for the application of the penalty system adopted by the Company on the basis of the respective National Work Contracts.

Health and Safety at Work

The Company guarantees a work environment that conforms with the regulations in force in matters concerning safety and health, by means of the monitoring, the management and prevention of risks connected to the execution of professional activities.

Occupational health and safety

The Company guarantees a working environment that complies with current health and safety regulations by monitoring, managing and preventing the risks associated with carrying out professional activities.

Protection of Privacy

The confidential information regarding the collaborators is managed, in conformity with the regulations of reference in force, with methods that are appropriate to guarantee the greatest transparency towards those directly interested and the inaccessibility by third parties. The greatest collaboration is guaranteed to the Data Protection Commissioner, following requests for information / documentation and/or inspections.

Internal Communications

The Company recognizes the importance of internal Company communications as an instrument for sharing institutional information and as a motivational vehicle towards personnel.

Relationship with Suppliers

The Company develops relationships based on correctness and transparency with its suppliers. The choice of suppliers is based on their professional competence, the solidity and organizational



sustainability and on the search for the best price – quality relationship. In particular, wherever possible, cases of conflict of interest must be avoided and a selection based on criteria of transparency and objectivity must be guaranteed. In the management of the relationships with suppliers, The Company adopts principles of correctness and integrity, while raising the awareness among the suppliers that they must carry out their activities according to standards of behaviour that are indicated in the Code of Ethics.

Relationships with Public Institutions and other external parties

The Company maintains continuous, constructive and transparent relationships with all external parties, including institutions and the media, directing pathways, strategies and choices so that they respond promptly to social dynamics and excel also on a level of reputation.

Relationship with Public Institutions

The institutional relationships with the Public Institutions and Entities are based on principles of correctness and transparency, in respect of the mutual roles while excluding any behaviour or position aimed at improperly and/or unduly influencing their activities or that it may only appear so. In particular, it is prohibited to all the Addressees to receive and /or unduly offer or promise to public officers and / or employees or whoever is charged with Public office, gifts, benefits, utilities of any kind, both directly or indirectly. In the case of judicial procedures, all behaviour carried out under any form, directly or by means of a physical or juridical person for the aim of favouring or damaging a party in a civil, penal or administrative case is strictly prohibited.

Relationships with Political Organizations

The Company does not make donations to movements or organizations having a political aim. The personal participation, of the Addressees, in political organizations is done independently from the duties carried out within the Company and in accordance with methods foreseen by the legislation in force.

Relationships with the media and with public relations organizations.

The communications intended for the outside must be truthful and transparent. Activities such as the publication of documents, release of interviews, the carrying out of presentations concerning the Company are allowed after prior authorization from the appropriate Company officers.

Relations with media and public relations

Communications intended outside must be truthful and transparent. Activities such as publishing documents, granting interviews. Presentations relating to the Company are permitted with the prior authorization of the relevant corporate functions.