



CODE OF ETHICS H.Eich S.r.l.

APPROVED BY THE ADMINISTRATIVE BODY
IN FULL ON 19/04/2023

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INTRODUCTION

H.Eich S.r.l. is distinguished by an entrepreneurial style that, since its inception, has made values such as honesty, transparency, social and environmental responsibility and innovation its hallmark.

The Company intends to clearly reaffirm the set of corporate principles and values in which it has always recognised itself and which it intends to share with all those who, in various capacities, are bound by a business relationship with the Company.

A fundamental instrument within this process is the present "Code of Ethics", adopted by resolution of the Administrative Body on 19/04/2023.

The Code of Ethics, moreover, is a "safeguard" in addition to other protocols and procedures grouped under the so-called "organisational and management model", the provisions of which were drawn up in accordance with the Confindustria Guidelines for the Construction of Organisational, Management and Control Models pursuant to Legislative Decree 231/2001 and whose Guarantor is the Supervisory Body referred to in the same Model.

1. COMPANY PRESENTATION

H.Eich S.r.l. was established in 2003 by Massimo Frosini, Silvia Mazzoli and Giovanni Guastella.

The primary mission is to create and market quality clothing and accessories that stand out on the national and international scene for the refinement of the fabrics and the originality of the lines and that, while maintaining high quality standards, are intended for a vast audience in search of an informal yet refined style.

The Company's expectations were not disappointed.

The company, which today also sees Niccolò Frosini, who took over from his father Massimo, at its top management, has established itself on the international markets with the ottod'Ame and Mxme Road brands, achieving important goals in terms of popularity and turnover.

H.Eich S.r.l., which can rightfully be considered a family company with twenty years of history and successes to its credit, is a solid industrial and commercial reality, made up almost exclusively of women who work for women with passion and dedication.

Over the years, the Company has moved towards the pursuit of ever higher quality standards and with a particular focus on the environment and the health of the planet.

With this in mind, the Company, in 2018, embarked on a path of experimentation and use of new materials aimed at obtaining certification as a 'green' company, committing to using recycled fabrics within the 'main line' and with a 'Caring' line already dedicated precisely to sustainable garments.

And this desire has not only involved garments and accessories but the entire production process: the company, in fact, purchases hangers, bags, tags and small plastic components only in 100% recycled materials.

As far as textiles are concerned, the company has activated a rigorous process of selecting suppliers who are able to certify the sustainability of their fabrics.

To this end, the company has created ad hoc lines with garments with certifications such as EKO TEX-STANDARD 100 and ICEA GRS, and has chosen to use for some garments mixed fabrics in organic and regenerated cotton as well as fabrics in 'ECOTEC' cotton and 'EcoVero' viscose, obtained through production processes that allow for a considerable reduction in gas emissions and water consumption.

Alongside its concern for the environment, the company has always moved by taking the needs of its customers into utmost consideration.

In this perspective, the concept of 'omnicannality' has been developed, giving the customer, who has gone to the shop, the opportunity to complete purchases of any missing goods by accessing the online shop site directly from the shop itself or, conversely, by diverting customers from the digital shop to the physical shop through drive-to-store campaigns.

The company also dedicates great attention to customer care, designed to accompany customers before and, above all, after the sale.

Today, the company, based in Signa in its own building, can boast single-brand shops in several Italian cities and multi-brand stores in some of the most famous international locations: France, the United Kingdom, Japan, Spain and Germany, to name but a few, while many others are soon to open.



2. STRUCTURE OF THE CODE OF ETHICS

This Code of Ethics consists of three parts:

- Ethical Principles and Values: the ethical principles and values that H.Eich S.r.l.(hereinafter, "the Company" or "the Business") adheres to, including all those who work within the Company or who, for any reason, have relations with it (id est: Addressees);
- Standards and Rules of Conduct: these set out the criteria of conduct and the guidelines that must govern the Company's activities and, in particular, the rules of conduct addressed to the Recipients of this Code and that the same are called upon to observe also to prevent the risk of commission of unlawful or simply unethical conduct;
- Implementation, control and monitoring procedures: rules are identified that describe the procedures for disseminating the Code, as well as those for updating and implementing the principles and rules of conduct it contains. The procedures for reporting and managing any violations are also defined.



3. ADDRESSEES, SCOPE OF APPLICATION AND DISSEMINATION OF THE CODE OF ETHICS

This Code of Ethics applies to H.Eich S.r.l. and the Companies controlled by it.

Moreover, this Code is also addressed to the Shareholders and company representatives, as well as collaborators, consultants, suppliers, partners, contractors and sub-contractors and all those who, directly or indirectly, permanently or temporarily, for any reason and regardless of the type of contractual relationship, contribute to the achievement of the company's aims and objectives, and as such are required to comply with the provisions and values contained herein.

For these categories of subjects, therefore, any violation of the provisions of this Code may be identified among the grounds for automatic termination of the contract pursuant to Article 1456 of the Italian Civil Code, or legitimise the termination of existing contractual relations.

This Code of Ethics is an integral part of existing and future employment contracts.

Therefore, violation of the provisions contained herein shall constitute a disciplinary offence, sanctioned and prosecuted by the Company in accordance with the provisions of the Law and in compliance with the provisions of art. 7 L.300/1970.

The Code of Ethics is valid both in Italy and abroad, albeit in consideration of the cultural, social and economic diversity of the various countries in which H.Eich S.r.l. operates and of any adaptations required by the specific legislation of the country.

4. ETHICAL PRINCIPLES AND VALUES

In the realisation of its corporate purpose, H.Eich S.r.l. is inspired by the following principles and values that represent an inalienable asset for the Company and must be understood as binding for all the Addressees of this Code:

4.1 Ethics in the management of company activities;

4.2 Work ethics and protection of Collaborators

4.3 Responsibility towards the community and the environment.

4.1 Ethics in the management of company activities

4.1.1 THE PRINCIPLE OF LEGALITY

H.Eich S.r.l. understands the observance of the laws and regulations in force in all the countries where it operates as an unavoidable principle.

4.1.2 THE PRINCIPLE OF INTEGRITY, HONESTY, FAIRNESS AND PROFESSIONALISM

In the performance of all activities related to the business and in relations with third parties - customers, suppliers and competitors - H.Eich S.r.l. undertakes to act fairly, honestly, ethically and in compliance with the laws in force.

None of the Addressees is authorized to take unfair advantage of another person - natural or legal - through manipulation, concealment, illegal use of privileged or confidential information, misrepresentation of essential facts or any other unfair practice.

4.1.3 THE PRINCIPLE OF TRANSPARENCY

H.Eich S.r.l. undertakes to disseminate to the Addressees transparent, complete, accurate and comprehensible information that enables the counterparts to establish business or professional relations with the Company in full knowledge of the facts and to know truthfully and reliably the Company's performance as well as any economic, patrimonial or financial element of the Company.

4.1.4 THE PRINCIPLE OF CONFIDENTIALITY

Any information that is acquired by the Company's employees and/or collaborators by reason of their role/department belongs to H.Eich S.r.l. and constitutes an essential part of the patrimony of intangible assets indispensable for the creation of value.

The Company requires from its employees/collaborators a special degree of caution in communicating such confidential information and recommends the adoption of all necessary precautions to prevent its unauthorised disclosure and the risk of public dissemination.

The same precautions, in full compliance with the relevant legislation in force (specifically the "Regulation (EU) no. 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC ("General Data Protection Regulation")" (hereinafter "GDPR"), as well as the Italian coordinating legislation), are required for the processing of personal data of employees, customers, suppliers or third parties, which are conferred or communicated to the Company in the context of its activities.

4.1.5 THE PRINCIPLE OF DIGNITY AND EQUAL OPPORTUNITIES

H.Eich S.r.l., consistently with its ethical vision, supports and promotes the value of the person through the respect for the physical, cultural, moral and sexual integrity of individuals whose personal safety and freedom it also protects.

It therefore repudiates any discriminatory activity or attitude that could lead to injury to the safety and dignity of the individual, as well as any possible exploitation or reduction to a state of subjection of the person, all the more so if minor.

Therefore, in carrying out its business activities, the Company takes impartial decisions in full respect of the principles of dignity and equal opportunities.

4.1.6 THE PRINCIPLE OF EQUALITY AND PROHIBITION OF EXPLOITATION

H.Eich S.r.l. guarantees and promotes respectful working conditions for the worker's dignity.

The Company recognises the workers' freedom of association, also of a union or political nature, and the right to collective bargaining.

H.Eich S.r.l. undertakes not to make use, not even indirectly, of either forced and compulsory labour or child labour and to comply with the national regulations in force concerning working hours and equal pay for men and women.

H.Eich S.r.l. does not tolerate sexual harassment and physical or psychological harassment, in whatever form and scope they may occur.

4.2 Work ethics and Protection of Collaborators

4.2.1 SAFETY, HEALTH PROTECTION AND WORKING CONDITIONS

H.Eich S.r.l. protects the psychophysical integrity of its employees and collaborators and, in this perspective, promotes comfortable and safe working conditions and environments, in compliance with the regulations in force. Also in order to provide its collaborators with the best professional and safety skills, H.Eich S.r.l. undertakes to periodically offer refresher and training courses.

4.2.2. LOYALTY AND ABSENCE OF CONFLICT OF INTEREST

H.Eich S.r.l. requires its Co-workers to avoid any situation of conflict of interest between personal or family economic activities and duties held in the Company that may affect the independence of choice and judgement and that, therefore, every decision is taken in the exclusive interest of the Company.

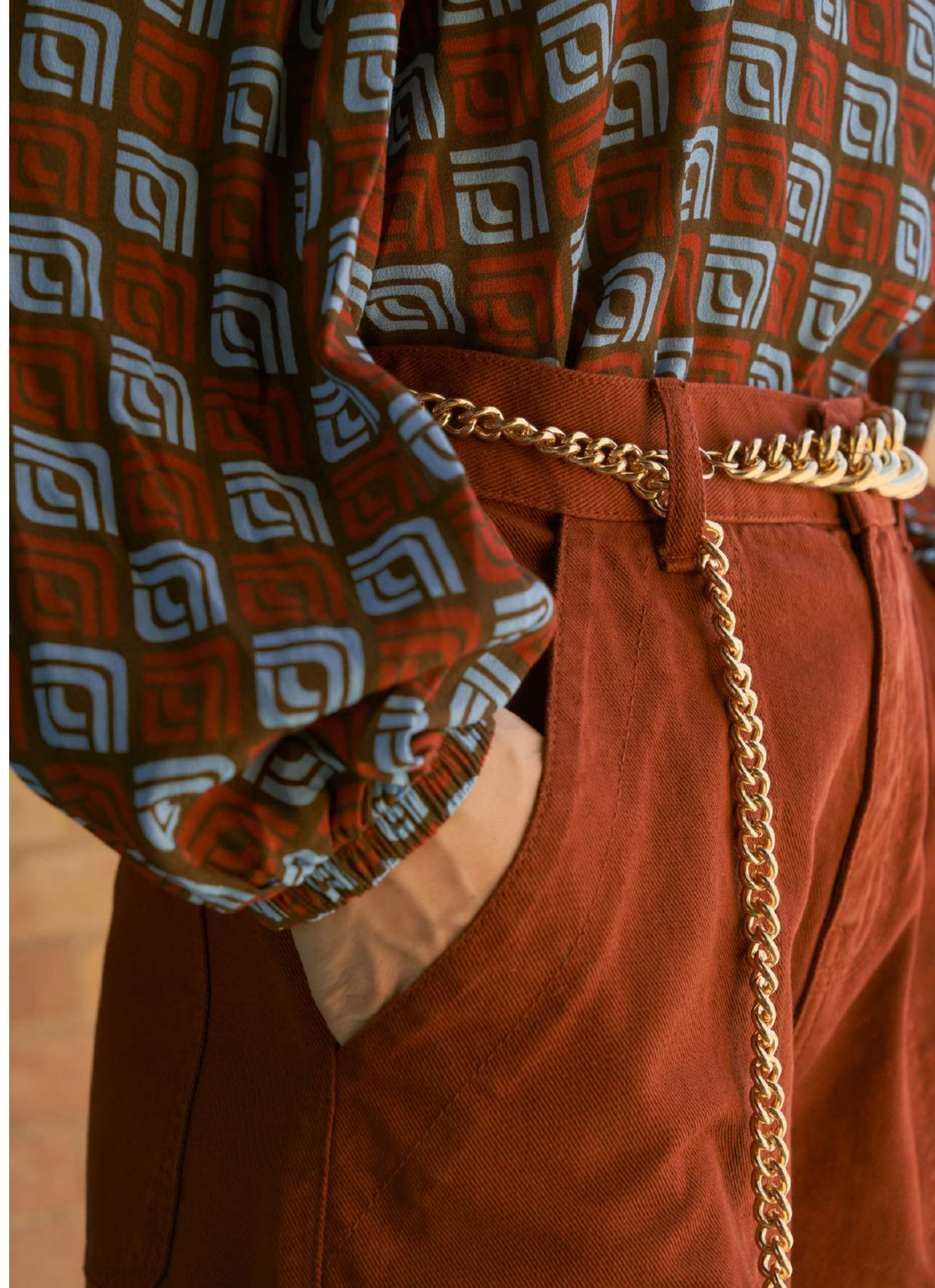
4.2.3 RIGHT TO REPORT

H.Eich S.r.l. guarantees each Collaborator who has become aware of facts, conducts and attitudes contrary to the principles and values contained in the Code of Ethics, the right to report, confidentially and also anonymously, according to the modalities better described in the Whistleblowing Policy.

4.2.4 RESPONSIBILITY TOWARDS THE COMMUNITY

H.Eich S.r.l. carries out its activities in full respect of the environment, the territory and the needs of the community in which it operates.

With this in mind, the Company scrupulously observes national and community legislation on environmental and safety issues and carries out its business development by always using the best available technologies, aiming at pursuing the environmental sustainability of its products, selecting suppliers that use environmentally friendly fabric production techniques and with the lowest possible impact in terms of pollution and exploitation of resources.



5. STANDARDS AND RULES OF CONDUCT

Without prejudice to the Ethical Principles set out in the first part, a number of rules are illustrated below, the purpose of which is to indicate the conduct that must be maintained in the performance of relations pertaining to the various corporate activities.

5.1 Relations with Stakeholders

The Company manages relations with its Stakeholders, including corporate representatives, senior management and external parties (consultants, agents, representatives, intermediaries, etc.) in full compliance with the laws in force, the principles of this Code, internal regulations and protocols, as well as those provided for in the Management and Control Model pursuant to Legislative Decree 231/2001, conducting itself with loyalty, honesty, fairness and transparency.

The Company, taking into account the information available, shall refrain from having any direct or indirect relations with persons whose involvement in unlawful activities is known, or even merely suspected (including in relation to the employment or exploitation of workers).

5.2 Relations With Customers And Suppliers

H.Eich S.r.l. deals with its customers and suppliers with professionalism, fairness and transparency, in compliance with all applicable laws and all internal Company protocols.

The Company, when engaged in production activities, undertakes to supply products with high standards of quality and safety and responding to customer requirements also through a rigorous selection process of suppliers of raw materials and services.

5.3 Relations with the Public Administration

The management of relations between the Company and the Public Administration is reserved exclusively to the Functions appointed for this purpose and to authorised personnel, and must take place in strict compliance with the provisions of the Law and the Procedures set out in the Model.

The Company diligently keeps the documentation relating to the procedures involving the Public Administration and takes care to verify through the persons in charge the correct use of the public funds of which it is the beneficiary for any reason.

Any gifts addressed to public entities shall be paid in compliance with the laws in force.

With regard to relations with the Supervisory Authorities, the Company guarantees the completeness, integrity and truthfulness of the information provided.

5.4 Relations With Political And Trade Union Organisations

H.Eich S.r.l. respects and supports the freedom of association in line with the provisions of collective bargaining.

5.5 Relations with Employees

H.Eich S.r.l. requires its employees and collaborators to perform their duties with professionalism and dedication and to scrupulously observe the provisions of this Code of Ethics.

Working activities shall be performed with diligence and with absolute respect for colleagues and company property; personnel shall take the utmost care of their own person.

It is fundamental that staff and collaborators take care of the environments in which they carry out their activities (offices, shops, exhibition spaces, warehouses) and, more generally, of everything that can be understood as Company assets, including in this meaning also warehouse goods, computer systems, equipment and furnishings.

5.6 Relations with the Mass Media

Relations with the press and other mass media are reserved for the appointed corporate bodies and functions as well as external collaborators (individuals/Agencies/Companies) to whom the Company delegates the management of such activity.

The promotion of the Company respects the ethical values set out in this Code, repudiating the use of vulgar or offensive messages.

The Company, through its appointed functions and collaborators, verifies and controls that the information published on the institutional website is correct, truthful and respectful of the ethical principles set out in this Code.

6. METHODS OF IMPLEMENTATION, CONTROL AND MONITORING

6.1 Supervisory Body and Code of Ethics

The control and training activities relating to this Code of Ethics are entrusted to the Supervisory Board, appointed pursuant to Articles 6 and 7 of Legislative Decree 231/01, which shall monitor the compliance with it; request any updates; promote its dissemination and report to the competent corporate bodies its observations on alleged violations of the Code of Ethics of which it becomes aware.

6.2 Dissemination, Reporting and Sanctions

The Code of Ethics and its updates must be brought to the attention of all Addressees through suitable dissemination activities.

To this end, the Code of Ethics is: published on the institutional website; a hard copy is posted on the company notice boards and, at the time of signing the employment contract, every employee is required to read it.

In particular, any violation of the principles and provisions contained in this Code of Ethics must be promptly reported by the Addressees to the Supervisory Body as specified in the following paragraph (Whistleblowing).

As regards, on the other hand, the system of sanctions, please refer to what is established in the Management Model for the different categories of Addressees.

6.3 Whistleblowing

The Addressees of this Code are obliged to report any violations of the principles and provisions contained herein, and failure to do so is expressly sanctioned.

In the event of news of any irregular conduct or violations of this Code of Ethics, whether active or omissive, consummated or attempted, employees who become aware of it shall refrain from personally conducting any investigation and shall promptly report it to the Supervisory Board.

Reports to the Supervisory Board may be made by e-mail to the dedicated address odv231@heich.it or by letter sent to the Company's registered office for the attention of the Supervisory Board.

Pursuant to and for the purposes of Article 6 of Legislative Decree 231/2001, as amended by Article 2 of Law 179/2017, the identity of the person making the report shall be kept confidential and any act of retaliation or discrimination against the person making the report for reasons directly or indirectly related to the report shall be prohibited.

