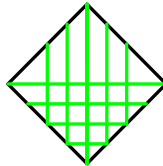




Il marchio della
gestione forestale
responsabile



CARLO BRANDIGI s.r.l.

Filati in carta – Twisted paper yarns

Code of Conduct

1. Introduction: Carlo Brandigi srl is strongly committed to respecting the highest ethical standards in all its procurement activities.

Therefore, this Supplier Code of Conduct has been prepared to provide a clear summary of the national expectations of Carlo Brandigi srl from suppliers in all procurement transactions, ensuring compliance with the internationally recognized procurement ethics. Transparency and accountability must be strictly respected in all procurement activities. The ethics of Carlo Brandigi srl's national procurement focuses on zero tolerance towards corruption, avoiding any form of conflict of interest and honest representation of the supplier's capabilities. Suppliers are strongly encouraged to familiarize themselves with this Code of Conduct to ensure successful working relationships with Carlo Brandigi srl.

1.1. Expectations for suppliers: Suppliers must maintain accurate books and records demonstrating compliance with these legal requirements and standards, to the extent permitted by law. Our suppliers are expected to align with the following standards, we recognize that our suppliers operate in different legal and cultural environments, and we are willing to consider different approaches if suppliers have found better solutions.

CHILD LABOR

Requirements:

Supplier does not employ persons under the age of 16, except as permitted by local law. The provider keeps records of each individual's date of birth or has legitimate means to confirm each individual's age.

Guidelines:

- The supplier complies with the laws and regulations relating to the minimum working age. No employee of any age, including apprentices or professional students, may be hired in violation of local regulations governing the minimum working age or mandatory school age.
- The supplier warrants that workers under the age of 18 are not allowed to:
 - Working in hazardous conditions or those that require handling hazardous materials in an unsafe manner.
 - Work more than 8 hours a day.
 - Works mainly at night.
 - Work in a way that unreasonably interferes with vocational education.
- Where independent records are not available, Supplier employs other legitimate and reliable means to determine the age of employees.

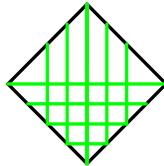
Carlo Brandigi s.r.l. 50060 Via Aretina ,90 S.Ellero (FI) Italy

T : +39.055.8311201 E : info@brandigi.com W : www.brandigi.com

Twisted paper yarns since 1937 - 100% Made in Italy - FSC Certification C023645



Il marchio della
gestione forestale
responsabile



CARLO BRANDIGI s.r.l.

Filati in carta – Twisted paper yarns

FORCED LABOR

Requirements:

Supplier employs all employees on a voluntary basis and does not use prison, slave, bondage, forced or indentured labor, or engage in other forms of compulsory labor or other forms of slavery or human trafficking.

Guidelines:

- The Supplier does not require employees to file original identification documents, travel documents or other personal legal documents after the start of the employment relationship with the Supplier.
- Supplier warrants that during the hiring process and hiring period, no deposits (monetary or otherwise) are collected from employees, including temporary, seasonal and migrant work and employees provided by agencies, recruiters or brokers. If a commission is collected in violation of these guidelines, the supplier shall promptly pay, if applicable, all fees directly to contractors / employment agencies or other employment providers, or promptly reimburse the worker performed.
- The supplier does not oblige employees to work overtime.
- The supplier will not delay or withhold the payment of workers' wages for more than one month on a regular basis.
- The supplier does not restrict or subject employees to restrictions on free movement.
- The supplier does not use or supply raw materials or products associated with forced labor or human trafficking.
- Supplier will only use legitimate and reputable recruiting agencies duly licensed to operate under applicable laws.

MIGRANT LABOR

Requirements:

Supplier recognizes the unique legal, social and cultural situations that migrant workers face and will ensure that such workers are treated with dignity, respect and in accordance with the same standards as other workers. Guidelines:

- The supplier provides migrant workers with working conditions (wages, working hours, etc.) that are lawful and comparable to those of other workers who perform substantially the same tasks. The supplier will verify the legal status of all migrant workers and ensure that only those with a valid work permit issued by the relevant government authority are employed.
- The supplier will not hold official identification documents, including passports, work permits and birth certificates, even at the request of the migrant worker.
- Supplier will pay all taxes related to services provided by third party contractors or employment agencies.

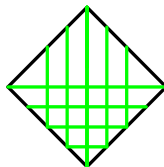
Carlo Brandigi s.r.l. 50060 Via Aretina ,90 S.Ellero (FI) Italy

T : +39.055.8311201 E : info@brandigi.com W : www.brandigi.com

Twisted paper yarns since 1937 - 100% Made in Italy - FSC Certification C023645



Il marchio della
gestione forestale
responsabile



CARLO BRANDIGI s.r.l.

Filati in carta – Twisted paper yarns

ABUSE, HARASSEMENT, DISCIPLINARY ACTION

Requirements:

Supplier does not commit physical, mental, verbal and sexual or other abuse, inhuman or degrading treatment, corporal punishment or any form of harassment. Supplier treats all employees with respect and dignity and complies with local legislation on disciplinary practices.

Guidelines:

- The supplier maintains a formal written disciplinary procedure and these procedures must be clearly communicated to all employees and prospective employees. All disciplinary measures must be recorded and the employee (s) affected by a disciplinary action must acknowledge the action in writing.
- The supplier will not set monetary fines and / or will not take deductions from wages for disciplinary reasons.
- Supplier will establish written and / or verbal procedures for handling employee complaints regarding workplace conditions and treatment.
- Vendor conducts security procedures in a gender-appropriate and non-intrusive manner, if applicable.

FAIR AND EQUAL TREATMENT

Requirements:

The supplier's terms and conditions of employment, including hiring, training, employment conditions, allowances, benefits, promotions, discipline, termination or retirement, are based on the person's qualifications, performance, skills and experience.

Guidelines:

- Supplier maintains workplaces free from discrimination based on race, color, age, sex, gender or gender identity, caste, political opinion, national origin, religion, marital status, sexual orientation, disability or genetic information, motherhood, membership, affiliation or other status of the individual unrelated to the ability to do the job.
- Supplier does not conduct employee medical tests that can be used to discriminate (eg pregnancy test). The results of any tests required by local legislation must not be used in a discriminatory way.

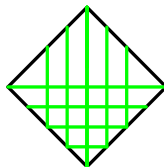
Carlo Brandigi s.r.l. 50060 Via Aretina ,90 S.Ellero (FI) Italy

T : +39.055.8311201 E : info@brandigi.com W : www.brandigi.com

Twisted paper yarns since 1937 - 100% Made in Italy - FSC Certification C023645



Il marchio della
gestione forestale
responsabile



CARLO BRANDIGI s.r.l.

Filati in carta – Twisted paper yarns

COMPENSATION AND BENEFITS

Requirements:

Supplier compensates all employees fairly by providing wages and benefits in accordance with all applicable laws.

Guidelines:

- Supplier ensures that wages paid for all hours worked meet at least the statutory minimum wage or local industry minimum standards for compensation, whichever is higher.
- The supplier pays employees on time, in accordance with legal requirements; in any case, wages must be paid at least on a monthly basis.
- The supplier ensures that, where workers' wages depend on the volume produced (rate, quotas, etc.), workers always earn at least the equivalent of the applicable minimum wage for each 8-hour day and are not obliged to work more than 8 hours a day to earn the minimum wage. Where there is no statutory minimum wage, suppliers ensure that workers earn at least the average wage in a given industry or geographic area.
- Supplier meets all legal requirements for overtime pay and incentive rates. Supplier pays overtime at a premium rate / rate at least equal to the normal compensation rate.
- Provider offers all statutory benefits such as public holidays, paid leave / annual leave, sick days and maternity / paternity / family leave.
- Suppliers, where reasonably practicable, must provide all workers (permanent, temporary, seasonal, domestic and migrant) with a written contract in the appropriate language that includes a description of job duties, performance, disciplinary procedures and notice periods. Where the provision of a written contract is not reasonably possible or practical, suppliers provide workers with a verbal description of the working conditions.
- The supplier provides each employee with a detailed salary statement upon salary payment. The statement includes, at a minimum, amount of pay, pay period, pay rate, overtime and overtime hours, deductions and benefits, if applicable.

WORKING HOURS

Requirements:

Supplier complies with all applicable laws regarding regular business hours, rest periods and overtime hours. Guidelines:

- Suppliers must provide workers with at least 24 consecutive hours of rest every 7 days.
- Supplier does not require a workweek of more than 60 hours, including overtime, unless operational circumstances require a temporary increase in working hours. The provider consults employees about the temporary increase in working hours and provides compensation for these additional hours or overtime allowance at a premium rate.
- The supplier does not force employees to work overtime and employees will not be punished, penalized or fired for refusing to work overtime.

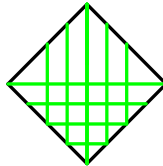
Carlo Brandigi s.r.l. 50060 Via Aretina ,90 S.Ellero (FI) Italy

T : +39.055.8311201 E : info@brandigi.com W : www.brandigi.com

Twisted paper yarns since 1937 - 100% Made in Italy - FSC Certification C023645



Il marchio della
gestione forestale
responsabile



CARLO BRANDIGI s.r.l.

Filati in carta – Twisted paper yarns

FREEDOM OF ASSOCIATION / COLLECTIVE BARGAINING

Requirements:

Supplier respects the right of employees to form and join trade unions and bargain collectively in a lawful and peaceful manner, in compliance and in accordance with applicable law.

Guidelines:

- The supplier complies with all applicable laws regarding freedom of association and collective bargaining.
- The supplier does not discriminate on the basis of affiliation or non-affiliation.
- The supplier does not allow management interference in the organization of workers. Supplier does not subject its employees to harassment, intimidation or retaliation in their efforts to associate or bargain freely.
- Supplier provides employees with confidential and anonymous means to raise complaints and record this process

HEALTH AND SAFETY

Requirements:

Supplier complies with all applicable occupational health and safety laws.

Guidelines:

- The supplier provides a safe, clean, healthy and productive work environment, including the provision of clean drinking water to all workers and an adequate number of washing and toilet facilities for men and women.
- Third party suppliers or agencies that provide worker dormitories must provide workers with adequate lighting, temperature, ventilation, toilets, shower or bath facilities, and access to clean drinking water. Dorms must be clean and safe and provide emergency exits, reasonable personal space, and reasonable entry and exit privileges.
- Supplier must provide workers with written health and safety information and warnings, in the primary language or languages of their workers. The supplier must publish, in the main language or languages of its workers, material safety data sheets that describe the toxic or dangerous substances used in the workplace and correctly manage the handling of all dangerous substances and machinery.
- The supplier must provide all appropriate personal protective equipment.
- Supplier adequately trains employees on applicable local occupational safety practices, including emergency evacuation procedures. The supplier provides systems and training designed to help prevent accidents and injuries.
- Supplier maintains records relating to health and safety training and occupational accidents and injuries.
- The supplier must establish and maintain adequate first aid equipment at the facility and make it available to workers at all times. The location of the equipment must be clearly marked and communicated to workers.
- The supplier provides adequate access to medical facilities, fire exits, and fire and safety equipment.

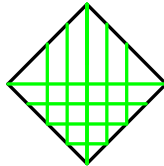
Carlo Brandigi s.r.l. 50060 Via Aretina ,90 S.Ellero (FI) Italy

T : +39.055.8311201 E : info@brandigi.com W : www.brandigi.com

Twisted paper yarns since 1937 - 100% Made in Italy - FSC Certification C023645



Il marchio della
gestione forestale
responsabile



CARLO BRANDIGI s.r.l.

Filati in carta – Twisted paper yarns

ENVIRONMENT

Requirements:

The supplier complies with all applicable environmental laws and regulations. The supplier constantly strives to improve environmental performance.

Guidelines:

- Vendor documents and maintain records of compliance with local and national environmental laws and regulations, including environmental permits and reporting requirements.
- Supplier manages and stores hazardous materials and waste properly, has a plan to manage hazardous waste discharges, and disposes of them safely and legally.
- The supplier ensures that relevant personnel have been adequately informed about the company's significant environmental impacts and trained on the company's environmental management system.
- The supplier minimizes and monitors its impact on the environment where possible through greenhouse gas emissions reductions, energy efficiency initiatives, reduction and recycling of natural resources, including water and paper / packaging materials.

ETHICAL BUSINESS PRACTICES

Requirements:

Carlo Brandigi srl expects all suppliers and contracted companies seeking to sell goods or services to conduct their business according to the highest ethical standards. Suppliers or potential suppliers must strictly comply with all rules and regulations regarding bribery, bribery and avoid unacceptable business practices. Therefore, suppliers must observe the following:

Guidelines:

- Will not offer, directly or indirectly, money, goods or services to Carlo Brandigi srl as consideration pending a decision, information, opinion, recommendation, favorable vote or any other form of favoritism that qualifies as corruption;
- It will not offer, give, accept or promise, directly or indirectly, to give as a gift to any Carlo Brandigi srl staff for the benefit of / or upon the indication or request of any Carlo Brandigi srl staff.
- Immediately inform the Top Management of Carlo Brandigi srl in the event that any staff of Carlo Brandigi srl solicits or has obtained or attempted to obtain gratifications for themselves or for any other person.
- Immediately declare if the personnel and / or officers of the Company had or have a relative employed by Carlo Brandigi srl. Failure to submit this declaration must be interpreted as a conflict of interest and may result in the supplier's exclusion from present and future procurement activities and / or other legal actions as deemed important by the Organization.

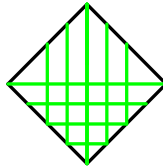
Carlo Brandigi s.r.l. 50060 Via Aretina ,90 S.Ellero (FI) Italy

T : +39.055.8311201 E : info@brandigi.com W : www.brandigi.com

Twisted paper yarns since 1937 - 100% Made in Italy - FSC Certification C023645



Il marchio della
gestione forestale
responsabile



CARLO BRANDIGI s.r.l.

Filati in carta – Twisted paper yarns

2. Compliance:

Supplier complies with legal or industry requirements and standards under all applicable laws and maintains accurate books and records demonstrating compliance with such laws and standards, to the extent permitted by law.

3. Other responsibilities:

3.1. Subcontracting: The Supplier does not use subcontractors or transfer its contractual obligations with Carlo Brandigi srl to third parties, without the prior written approval of Carlo Brandigi srl. Prior written acceptance of this code by the subcontractor or authorized transferee is required before starting production.

3.2. Communication of this code: Suppliers must inform workers about the expectations contained in this Code. This could include prominently posting the Code in the workplace in an area accessible to workers, holding group or individual meetings to review and explain the Code, distributing explanatory leaflets to workers or communicating through online channels.

3.3. Assignment of responsibility: The Supplier assigns a senior officer to continuously monitor the Supplier's compliance with this Code. The Supplier will immediately inform Carlo Brandigi srl of any relevant problem that is incompatible with this Code. The supplier informs Carlo Brandigi srl of any violations of this code, including, if the supplier so wishes, of the violations reported through a confidential information hotline. Such programs protect the confidentiality of employee whistleblowers and prohibit retaliation. Suppliers are responsible for promptly reporting actual or suspected violations of the law, of this Code and of any contractual relationship with Carlo Brandigi srl. This includes violations of any employee or agent acting on behalf of the supplier or Carlo Brandigi srl.

4. Compliance monitoring: To measure the Supplier's compliance with this Code, Carlo Brandigi srl reserves the right to conduct announced and unannounced on-site independent third party audits of the Supplier's facilities, accommodations, operations, books and records provided by the Supplier and conduct confidential interviews with workers in connection with these audits. Upon receipt of unsatisfactory audit results and failure by the Supplier to implement the recommended corrective actions, Carlo Brandigi srl, in its sole discretion, reserves the right to suspend any purchase from the Supplier until the corrective actions have been implemented, or to interrupt your relationship with the Supplier. Suppliers are responsible for educating and monitoring their suppliers, subcontractors and independent contractors.

Transparency: The supplier adopts a transparent approach to collaborate with Carlo Brandigi srl, including the disclosure of relevant policies and procedures. If requested, the supplier indicates the geographical position of the facilities that produce raw materials for Carlo Brandigi srl, as well as the origin of the raw materials within the direct supply chain of the suppliers. The Supplier will assume responsibility for implementing the requirements of this Code and the related due diligence processes with those of its direct supply chain. We recognize that many of the problems faced by manufacturers such as Carlo Brandigi srl arise in the lower levels of extended supply chains in which many more suppliers are involved. It is therefore essential that our direct suppliers recognize the role they must play in promoting responsible sourcing practices with their suppliers, including by ensuring that the principles of the Code are transmitted and respected by lower-tier suppliers and that compliance monitoring takes place at all levels in the supply chain.

Carlo Brandigi s.r.l. 50060 Via Aretina ,90 S.Ellero (FI) Italy

T : +39.055.8311201 E : info@brandigi.com W : www.brandigi.com

Twisted paper yarns since 1937 - 100% Made in Italy - FSC Certification C023645