

ex:elite

# CODE OF ETHICS

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# Introduction

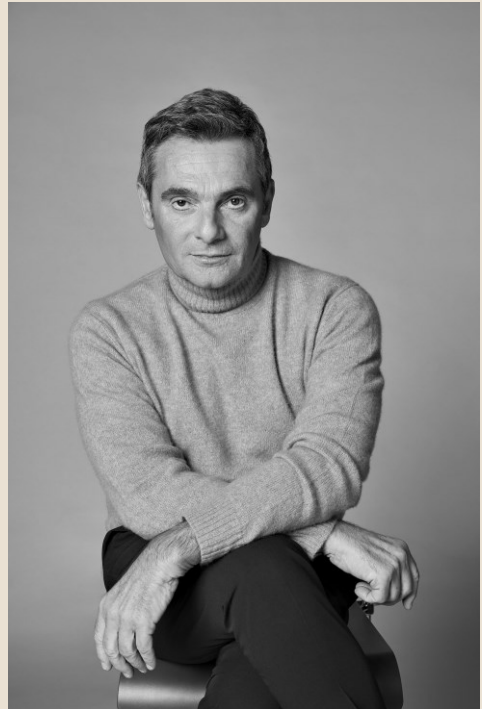
Since its establishment in 1995, the entrepreneurial project I envisioned has been based on a constant search for what constitutes the basis of excellence.

Thirty years of experience at the head of the Liu Jo brand and five intense years at the head of the Eccellenze Italiane group, now Exelite, have forged a corporate culture based on respect and business integrity towards all interlocutors that make up a synergic and interdependent ecosystem.

In order to conduct business with ethics and responsibility, it is essential that these principles underpin the behavior of every single element that makes up the human capital of the group's companies and that works in the name of/on behalf of the same.

My entrepreneurial dream stems from my life experience within a small but extremely dynamic community, which has been able to reshape itself over the years also through transparency and honesty in managing professional relationships.

These are the roots of Exelite and from them the group must rise to prosper and to become a reliable and consistent international leader.



This new version of the Code of Ethics builds on the rules of conduct and principles set out in the first code published in 2018 and evolves to encompass every possible application, regardless of where and under what conditions we conduct business.

I therefore invite you to read it with due attention and make it the foundation of the daily actions that guide the life of our group.

MARCO MARCHI  
SOLE ADMINISTRATOR EXELITE

# 1. Preamble

The set of ethical principles, values and behavioural rules set out in the paragraphs of this Code of Ethics must inspire the activities of all those who operate, either internally or externally, in the sphere of action of the companies of the Exelite group as set out in appendix 1 (hereinafter referred to as the 'Group').

Exelite S.p.A. provides for the dissemination of the Code of Ethics among the companies of the Group, so that they formally adopt it as a management tool and an effective element of the company's strategy and organization.

This Code of Ethics is inspired by the main national and international regulations and legislation on the protection of human rights and the environment and incorporates all conventions on health and safety in the workplace and existing standards for the protection of minors and dignity in the workplace against all forms of discrimination.

The Code of Ethics emphasises and incorporates the principles and rules of conduct relevant to the prevention of offences set out in Legislative Decree No. 231 of 8 June 2001 on the administrative liability of entities.

The Code of Ethics constitutes a fundamental support component of the 'Organisation, Management and Control Model', where adopted by the individual Group companies, for the prevention of the offences referred to in the aforementioned Decree

## 2. Addressees

The following parties (hereinafter referred to as 'the Addressees') are required to comply with the Code of Ethics:

- the administrative body, who must be inspired by the principles of the Code of Ethics when setting business objectives;
- the members of the control body who ensure the respect and observance of the contents of the Code of Ethics in the exercise of their functions;
- the heads of Departments/Functions who give concrete expression to the values and principles contained in the Code of Ethics, assuming responsibility both internally and externally and strengthening trust, cohesion and team spirit;
- employees in general who, with due respect for the law and regulations in force, adapt their actions and conduct to the principles, objectives and commitments set out in the Code of Ethics;
- all those working in the name of and/or on behalf of Group companies who conform their conduct to the Code of Ethics.

All Addressees are required to observe and, to the extent of their competence, enforce compliance with the principles contained in the Code of Ethics. In particular, the administrative body and top management of Group companies are also required to be the first to set an example of consistency between the principles of the Code and daily conduct. Under no circumstances does the pursuit of the company's interest justify the adoption of conducts in contrast with those set out herein.

Each Group company undertakes to ensure timely communication and training activities through:

- distribution to all members of corporate bodies
- distribution to all employees by attaching the document to their employment contract;
- distribution to third parties by attaching the document to the contract-posting in a place accessible to all;
- Make the document available on the internal portal/website;
- training activities for internal recipients.

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# PART ONE

CODE OF ETHICS

# 3. Group Values

## Resilience

Markets change form and values, lifestyles evolve and create new expressions in fashion and habits. We do not just react to new contexts, we anticipate changes and develop models without pre-packaged processes

## Synergy

The core strength of our Group is the expertise and drive of each individual, with his or her gifts and specific abilities: we harness our human resources by firstly focusing on relations between individuals to generate relational synergies between the individual companies.

## Respect

We choose to define respect as sustainability which is not just environmental, but also covers economic, financial and social aspects and relations with our partners.

## Italian Attitude

Creativity, intuition and the capacity to imbue every product with quality is symbolic of everyone (including us) born in a country which makes beauty its native cultural environment

## Excellence

The criterion for gauging our activities is the results generated, whether stylistic or financial. The Group's ambition is derived from our way of perceiving resources, talents and stories, a unique capital which we feel is ready to handle the challenges of the market and face the future

# 4. Ethical Foundations

Fashion is a mirror of time and a world in constant evolution, but also a tool for change.

Exelite is a group of companies and brands with strong synergies and continuous growth capable of enhancing authentic entrepreneurial stories internationally.

In its actions, the Group considers the reciprocity and interdependence of all the elements that make up the corporate ecosystem as one of its foundations, spreading a sense of responsibility, respect and attention to individual and collective needs, inside and outside the workplace.

In addition to the general approach to conducting business, the group assumes the following ethical principles:

## Legality

The Group, in carrying out its activities, acts in compliance with the legislation and all regulations in force in the territories in which it operates, as well as with the Code of Ethics and company procedures, applying them with rectitude and fairness.

## Confidentiality

The Group ensures the confidentiality and correct handling of the information and personal data it holds for the conduct of its business, for its employees, business partners and consumers in compliance with the EU data protection regulation 2016/679.

The Group also calls upon all its employees to be responsible for protecting the information acquired in the course of their work and for passing it on to the entities that need it for the same purpose.



## Loyalty, Transparency, Honesty and Fairness

In its business relations, the Group is inspired by and observes the principles of loyalty, transparency, honesty and fairness, regardless of the importance of the business. All actions, operations and negotiations carried out and, in general, the behaviour adopted are inspired by the utmost correctness, completeness and transparency of information, legitimacy under formal and substantial aspects and the clarity and truthfulness of accounting documents in accordance with current regulations and internal procedures.

## Protection of Competition

The Group operates in the market, both nationally and internationally; and competes fairly in the marketplace, respecting the principles and laws of the European Union and national laws to protect competition.

## Respect and Dignity of the Person

The Group is committed to promoting respect for the physical and cultural integrity of the individual and respect for the dimension of relationships with others. It guarantees working conditions that respect individual dignity, and protects and promotes the value of human resources, skills and competencies, diversity, and working and living time.

## Non-discrimination

Each Group company recognises and respects the principles of equality in its internal dealings and in its relations with third parties, and does not discriminate on the basis of gender, racial and ethnic origin, nationality, political and trade union opinions, religious beliefs, sexual orientation, gender identity, physical and mental disability or any other personal characteristic not related to employment.

## Product Quality and Safety

The Group is committed to being attentive to the changing needs of the market and to constantly improving the quality of its products by aligning with standards and regulations on quality, safety, intellectual and industrial property, and is committed to providing transparent and reliable information about its products.

## Health and Environmental Protection

The Group endeavours to ensure that its employees and collaborators work in a safe, healthy and legally compliant environment. Each Group company promotes a culture of worker health and safety in the workplace.

The Group promotes respect for the environment, understood as a common resource to be safeguarded for the benefit of the community and future generations with a view to sustainable development.

## Group Reputation

Each employee is an ambassador of the Exelite Group and a bearer of its values. In full protection of each individual's freedom of expression, the Group requires all employees and any collaborators working in the name or on behalf of the Group to respect the authorisations concerning communication to the public and use of the brand.

## Responsibility to the Community

The Group operates taking into account the needs of the community in which it carries out its activities and contributes to the promotion of the quality of life, economic, social, cultural and civil development by actively participating with initiatives both for charitable purposes and for the enhancement of local resources.

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# PART TWO

CODE OF ETHICS

# 5. Rules of Conduct

## 5.1 Rules of conduct towards suppliers/consultants and business partners

The Group is committed to seeking suppliers, external collaborators and business partners with suitable professionalism who fully share the principles and contents of the Code of Ethics; it promotes the building of lasting relationships for the progressive performance improvement in the protection and promotion of the principles and contents of the Code of Ethics.

The Group's professionalism and commitment characterize the selection and definition of the actions to be developed, the methods on which to base projects, as well as the selection of suppliers, external collaborators and business partners (this category includes suppliers of finished products, façonnists, suppliers of raw materials, fabrics, accessories, stylistic, technical and strategic consultants, suppliers of company services, agents, distributors, licensees and in general all commercial partners through which the product is distributed,) identified from time to time to define a complementary relationship with the specific professionalism, organising forms of collaboration and mutual exchange and delegating to them the execution of part of their activities.

Professional and commercial contributions must be characterised by commitment and professional rigour, and must, at all times, be aligned with the level of professionalism and responsibility that characterises the Group, with the aptitude and precision required to pursue the respect and dissemination of its prestige and reputation.

The Group does not recognise and opposes corrupt practices, collusive behaviour, solicitation of advantages, the payment of material and immaterial benefits as well as other advantages aimed at influencing or compensating representatives of institutions as well as members of the corporate bodies/employees of the Company (see sections 7 and 8).

Suppliers/consultants and business partners are selected in accordance with procedures that comply with the laws applicable from time to time and are constantly guided by criteria of transparency, competitiveness and efficiency.

## 5.2 Rule of conduct toward the consumer and client distributor of the product

The Group bases its conduct in its relations with both consumers and clients on the principles of transparency, reliability, responsibility and quality.

The Addressees must therefore:

- comply with laws and regulations concerning the conduct of its business.
- scrupulously observe the provisions of this Code of Ethics and the internal procedures relating to the management of relations with clients and consumers.
- provide the client with all information on the terms and conditions of the contract, so that the customer is fully aware of them at the time of the conclusion of the agreement, and on any changes in the economic conditions and on the implementation of any checks requested by the client.
- behave in a helpful, respectful and courteous manner, in line with Exelite's standards of the highest professionalism.

Each Group company is committed to responding to suggestions and complaints from clients and consumers, using appropriate and timely communication systems and providing accurate, complete and truthful information to enable the client and consumer to make an informed decision.

Communications and advertising messages addressed to client and consumers are inspired by the criteria of simplicity, clarity and transparency, avoiding the use of any deceptive, elusive or unfair practices and ensuring that the products and services provided to customers correspond to the commercial standards and the aforementioned communications.

Each company in the Group excludes the use of any advertising and/or communication tool that could, in any way, mislead clients and consumers about the quantity, quality, origin and source of the products/services offered.

### 5.3 Rules of conduct in human resources management

The Group recognises the central role of human resources in achieving the corporate mission and, consequently, adopts procedures and methods of selection, training and work marked by respect for human values, the autonomy and responsibility of workers as well as the importance of individual and organised participation and adherence to corporate objectives and values.

It is in the Group's interest and imperative to encourage the development of the potential of each employee or collaborator, promoting an environment and procedures and work organisation that are constantly marked by:

- respect, also when selecting personnel, for the personality and dignity of each individual, preventing at all times the creation of uncomfortable, hostile or intimidating situations
- the prevention of discrimination and abuse of any kind;
- the enhancement of the innovative and entrepreneurial spirit, while respecting the limits of each individual's responsibilities;
- the definition of roles, responsibilities, delegations and availability of information suitable for each member of the organisation to be able to take the decisions pertaining to him/her in the interest of each company of the Group;
- to a prudent, balanced and objective exercise by those responsible of the powers connected to the delegation received.

## 5.4 Rules of conduct in relations with the public administration

Relations with the Public Administration are characterised by transparency and fairness.

In particular, necessary relations are maintained, in compliance with the roles and functions assigned by law, as well as in a spirit of maximum cooperation with State administrations, in Italy or in other countries.

Relations with officials of public institutions are limited to the corporate functions in charge and regularly authorised in compliance with the strictest observance of legal and regulatory provisions and cannot in any way compromise the integrity and reputation of the Company.

To this end, it is forbidden to pay and offer, directly or through intermediaries, sums of money or other means of payment, material benefits and other advantages of any entity to third parties to government representatives, public officials or persons in charge of a public service, in order to influence them in the performance of their duties.

These requirements cannot be circumvented by resorting to different forms of contributions which, in the form of sponsorships, appointments and consultancies, advertising, gifts, presents, etc., have the same purposes as those prohibited above (cf. paras. 5.16 and 5.17.).

In relations with the Judicial Authority, it is forbidden to exert pressure, of any kind, on the person called upon to make statements before the Judicial Authority, in order to induce him/her not to make statements or to make false statements.

## 5.5 Labour relations with former Public Administration employees

The recruitment of former employees of the Public Administration, who in the course of their duties have had relations with the Group, or their relatives and/or relatives-in-law, takes place in strict compliance with the standard procedures defined by the company for personnel selection.

The establishment of other employment relationships with former employees of the public administration, or their relatives and/or relatives-in-law, also takes place in strict compliance with standard procedures.

## 5.6 Relations with the Judicial Authority

In relations with the Judicial Authority, it is forbidden to exert pressure, of any kind, on the person called upon to make statements before the Judicial Authority, in order to induce him/her not to make statements or to make false statements.



## 5.7 Rules of conduct in the conduct of business in general

Every operation and transaction carried out or put in place for the benefit of each company of the Group or in its interest must be inspired by the utmost fairness from the point of view of management, completeness and transparency of information, formal and substantial legitimacy, and clarity and truthfulness in accounting records, in accordance with the regulations in force and the procedures adopted; they must also be subject to verification.

## 5.8 Conflict of Interest

Any situation of conflict of interest, even if only potential, between personal or family economic activities and the company job held must be avoided.

By way of example, but not limited to, the following situations may give rise to a conflict of interest:

- having economic and financial interests, including through family members, with suppliers, business partners, customers or competitors.
- exploiting one's functional position to realise interests conflicting with those of the company.
- concluding, finalising or initiating one's own negotiations and/or contracts - in the name of and/or on behalf of the company - which have as counterparty one's own family members or associates, or legal persons of which he/she is the owner or in which he/she is otherwise interested
- accepting donations of money, gifts, favours of any kind from persons, companies or entities that are in business relations or negotiations with the company, including potential suppliers and bidding suppliers.
- using one's company position or information acquired in the performance of one's work in such a way as to benefit one's own interests or those of a third party, contrary to the interests of the company
- performing work of any kind (work and intellectual services, as well as holding corporate offices) for customers, suppliers or third parties in conflict with the interests of the company.

In any case, it is necessary:

- avoid all situations and activities in which there may be a conflict with the interests of the Company or which may interfere with the ability to take impartial decisions in the best interests of the company and in full compliance with the principles and contents of the Code of Ethics;
- in a general sense, exactly fulfil their functions and responsibilities.

In the event of a conflict situation as referred to above, each person is obliged to inform the administrative body thereof. Members of corporate bodies who, in a given company transaction, have an interest, either their own or that of third parties, are obliged to inform the shareholders in a timely manner.

## 5.9 Relations with the media

Relations between each Group company and the mass media in general are the exclusive responsibility of the corporate functions and responsibilities delegated to them and must be conducted in compliance with the communication policy defined by the company. No one may, therefore, provide information to representatives of the mass media without the authorisation of the competent functions.

In any case, information and communications relating to the Group and destined for the outside world must be accurate, truthful, complete, transparent and homogeneous

## 5.10 Relations with Partners

The Group guarantees its shareholders transparency of action and the right to be informed, in addition to the cases envisaged by the regulations in force, on any circumstance deemed to be of interest. To this end, it prepares appropriate information flows, from the operational functions to the administrative body and from the latter to the shareholders, to ensure constant updating and completeness of information.

## 5.11 Accounting records and consequent formation of financial statements

Every operation or transaction must be correctly and promptly recorded in the company's accounting system according to the criteria indicated by law and on the basis of the applicable accounting principles; every operation or transaction must be authorised, verifiable, legitimate, consistent and congruous.

In order for the accounting records to meet the requirements of truthfulness, completeness and transparency of the recorded data, adequate and complete supporting documentation of the activities carried out must be kept in the company's records, so as to allow for the following

- the accurate accounting record of each transaction
- the immediate determination of the characteristics and motivations underlying the same,
- the easy formal chronological reconstruction of the operation,
- the verification of the decision-making, authorisation and implementation process, and the identification of the various levels of responsibility and control.

Each accounting entry must reflect exactly what is shown in the supporting documentation. Therefore, it is the duty of each Addressee to ensure that the supporting documentation is easily retrievable and ordered according to logical criteria and in compliance with the company provisions and procedures.

Anyone who becomes aware of omissions, falsifications or carelessness in accounting records or supporting documents shall promptly report them to his or her superior.

It is expressly forbidden to disseminate any information, which may come to one's knowledge in the performance of one's duties, to non-relevant offices or colleagues and to the outside world

## 5.12 Internal Controls

Internal controls mean all the instruments necessary or useful to direct, verify and pursue the Group's activities with the aim of ensuring compliance with laws and corporate procedures, protecting corporate assets, effectively managing corporate activities and clearly providing true and correct information on the Company's assets and liabilities, economic and financial situation, as well as identifying and preventing the risks the Company may incur.

It is the task of each Group company to disseminate, at all levels, an internal culture characterised by awareness of the existence of controls and oriented towards the exercise of control.

## 5.13 Anti-Money Laundering

Each Group company scrupulously follows the regulations aimed at preventing money laundering, self-laundering and the financing of criminal activities.

To this end, the company is committed to complying with all national and international anti-money laundering rules and regulations.

Before establishing relationships or entering into contracts with non-occasional customers and other partners in long-term business relationships, they must be sure of the moral integrity, reputation and good name of the counterparty.

To this end, the Addressees are called upon to:

- immediately report potential anomalies of which they are aware in order to facilitate the prevention and combating of money laundering;
- carefully verify available information on counterparties and avoid entering into or maintaining commercial or financial relationships where there is reasonable doubt that counterparties may engage in conduct amounting to money laundering offences;
- make and accept cash payments only within the limits and amounts permitted by law;

- ensuring appropriate cooperation with the competent authorities in preventing, combating and suppressing the phenomena of counterfeiting and forgery of banknotes, coins and any other means of payment.

In the management of financial flows, it is forbidden to tolerate irregularities that, according to normal professional diligence, give rise to suspicions as to the legality and regularity of the origin of the money received.

#### 5.14 Community relations

The relationship with communities in the territories is based on the recognition of Exelite's role as a group that pursues business objectives while taking into account the impact on the territory in which it operates.

Exelite intends to establish itself as a group that contributes to the economic and social development of the territories in which it operates

#### 5.15 Intra-group transactions and related parties

All intra-group relations are managed in full compliance with applicable regulations and current market conditions and in accordance with the principles set out in this Code of Ethics.

The relations between the companies of the Group and the information of each company intended for the preparation of the consolidated financial statements meet criteria of transparency, correctness, effectiveness and traceability of the underlying economic relations and related financial flows.

The Group pays particular attention to transactions with related parties, including intra-group transactions, which must be carried out in full compliance with the principles of objectivity, transparency and truthfulness, and in accordance with the internal corporate procedure adopted by the administrative body.

## 5.16 Gifts, acts of kindness and other benefits

No form of gratuity is allowed, towards representatives of the public administration or public officials or towards private parties, which may reasonably be interpreted as exceeding normal commercial practices or courtesy, or in any case aimed at acquiring favourable treatment in the conduct of any activity connected to the companies of the Group.

It should be noted that a gratuity is understood to be any type of benefit (promise of an offer of employment either as an employee or in the form of consultancy, services, leisure travel or company products) except as provided for in commercial and product communication practices.

Similarly, managers, employees and all those acting in the name of and/or on behalf of Group companies may not receive gifts or favourable treatment, except within the limits of normal courtesy and provided they are of modest value. Any gifts received, which do not fall within normal custom, must be adequately documented and communicated to the Company.

In any case, such expenditure must always be authorised in accordance with specific company procedures and properly documented

The above rules, concerning both gifts promised or offered and those received, also apply in those countries where offering gifts of high value is customary.

## 5.17 Contributions and Sponsorships

Group companies adhere to requests for contributions limited to proposals from non-profit organisations and associations or those of cultural and social value, in accordance with internal procedures.

Particular attention must, however, be paid to possible situations of personal or corporate conflict of interest in the adherence to these initiatives.

Sponsorship activities may be carried out subject to the definition of specific agreements and verification of the honourability of the beneficiary and of the event/initiative promoted, avoiding giving sponsorships to counterparts who are even suspected of belonging to criminal organisations or of committing money laundering offences.

### **5.18 Relations with Supervisory Authorities**

Each Group company undertakes to fully and scrupulously comply with the rules dictated by the Supervisory Authorities, and to base its relations with the aforesaid Authorities on the utmost cooperation, respecting their institutional role, undertaking to promptly implement their prescriptions.

In particular, all Addressees are required to

- operate in compliance with applicable laws and regulations;
- behave towards the Supervisory Authorities in an efficient, cooperative and courteous manner, complying with any request made in the course of their inspection duties and cooperating in the relevant investigation procedures;
- provide accurate, complete and truthful information to enable the Supervisory Authorities to acquire all the necessary knowledge for decision-making;
- not hinder their work in any way by omitting data and/or information requested directly and/or indirectly.

### **5.19 Relations with political and trade union organisations and other forms of associations**

In order to contribute to the economic and social development of the territories in which it operates, each Group company, in carrying out its corporate mission, interacts with trade unions, politicians and other forms of associations. Those delegated by the company to deal with these subjects are required to respect the law, avoiding any collusive or corruptive phenomenon.

## 5.20 Protection of minors

Any use of minors in fashion shows and/or any video and photographic recordings, especially for publication on the internet and/or social networks, may only take place with the prior written consent of the holders of parental authority.

The Group, directly and/or through third parties, provides the conditions so that minors may only be used with a ban on arbitrary or illegal interference in privacy and in any case protected from any form of damage or exploitation.

It is absolutely forbidden to acquire, use, disseminate and/or transfer child pornography and/or engage in prostitution activities to the detriment of minors.

## 5.21 Protection of Industrial and Intellectual Property

Recipients shall act in full respect of the industrial and intellectual property rights legitimately belonging to third parties, as well as in compliance with the provisions contained in laws, regulations and conventions protecting such rights.

Each Group company encourages and promotes the technological innovation and development of its products and processes by its own employees and third parties who work for it and the Group.

To this end, all Addressees must abstain:

- from any conduct that may constitute usurpation of industrial property rights, alteration or counterfeiting of distinguishing marks of industrial products, or of patents, designs or industrial models, whether national or foreign, as well as from importing, marketing, in any case using or otherwise putting into circulation industrial products with counterfeited or altered distinguishing marks or made by usurping industrial property rights.
- the unlawful and/or improper use, in the interests of the company or third parties of intellectual works, or parts thereof, protected by copyright infringement legislation.



## 5.22 Confidential information, privacy protection and cyber crime

Each Group company undertakes to protect, in full compliance with the provisions set out in Legislative Decree no. 196/2003 - 'Personal Data Protection Code', from L. 48/2008 on the subject of computer crime, the personal data acquired, stored and processed within the scope of its business in order to avoid any unlawful or even improper access or use of such information as well as in compliance with EU Regulation No. 679 of 2016 (General Data Protection Regulation or GDPR) which, as of 26/05/2018, will replace the aforementioned Legislative Decree 196/2003

The company's activities constantly require the acquisition, storage, processing, communication and dissemination of data, documents and information relating to negotiations, transactions and contracts. The company's databases may also contain personal data that are protected by privacy legislation, data that may not be disclosed to the public and data whose disclosure could be damaging to the company.

Each addressee is therefore obliged to protect the confidentiality and privacy of information obtained in the course of his or her work.

All information, knowledge and data acquired or processed by the addressees through their duties may not be used, communicated or disclosed.

Each recipient shall:

- acquire and process only the data necessary and directly related to its functions;
- store such data in such a way as to prevent third parties from gaining knowledge of them;
- communicating and disclosing data within the framework of the procedures established by the company or with the authorisation of the person delegated to do so;
- determine the confidential and reserved nature of the information in accordance with the Company's established procedures.

Each Group company, for its part, undertakes to protect the information and data relating to its recipients and third parties, and to avoid any misuse thereof.

## 5.23 Use of company assets

Each Addressee is obliged to protect and use with diligence the company property and equipment made available for the performance of his or her duties, avoiding both improper use and use for personal purposes that may damage the same.

Any use of computer systems that may violate laws is prohibited

in force and cause undue intrusion into or damage to the computer systems of others.

Recipients are required to comply with the company's procedures and policies on computer security and to use company equipment in accordance with those procedures and policies.

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# PART THREE

CODE OF ETHICS

# 6. Implementation, control and monitoring

## 6.1 Body in charge of overseeing the application of the Code

Monitoring compliance with the Code of Ethics is entrusted to the administrative body of each Group company in conjunction with the Supervisory Board, where present, appointed pursuant to Legislative Decree 231/01.

The monitoring bodies are assigned the following tasks:

- monitoring compliance with the Code of Ethics also with a view to preventing the danger of the commission of the offences provided for by Legislative Decree 231/01
- formulating its own observations on ethical issues that may arise in the context of corporate decisions and alleged violations of the Code of Ethics referred to it
- provide operational support in the interpretation and implementation of the Code of Ethics, as a constant reference tool for the correct conduct to be adopted during the performance of one's activities
- monitor and coordinate the periodic review of the Code of Ethics, also through its own proposals for adaptation or updating; in order to take into account changes in corporate governance and/or organisation
- prepare and approve the ethical communication and training plan;
- report to the competent corporate bodies any violations of the Code of Ethics, suggesting the sanction to be imposed and verifying the effective application of any measures imposed.

## 6.2 Reports

All Addressees of the Code of Ethics, as better identified above, are required to promptly report violations of this Code of Ethics to Group companies.

Reports of violations of the Code of Ethics may be sent

- by filling in the form on the encrypted web platform, accessible via the link <https://LIUJO.PARROTWB.APP/> where available
- By sending written communication to the company's registered office, or by PEC to the company's PEC address.

The Exelite Group protects the authors of reports against any retaliation they may face for reporting misconduct and to keep their identity confidential, without prejudice to legal obligations

# 7. Final Provisions

The Company's administrative body approves the Code of Ethics, as well as any amendments/supplements thereto, taking care of any revision of the Code of Ethics, and assesses any amendment/supplementation proposals coming from the Supervisory Board.

# Appendix 1

- Exelite S.p.A
- Blufin S.p.A
- Eli S.r.l
- Digital Boite S.r.l
- Liu Jo Uomo S.r.l
- Liu Jo Luxury S.r.l
- Me Pet S.r.l
- EIH Logistics S.r.l