

Notice is hereby given that on 27/02/2023 the Board of Directors of the company ALPE-ADRIA TEXTIL S.R.L. resolved on:

- the adoption of an Organisational Model pursuant to Legislative Decree 231/01
- the adoption of a Code of Ethics and a Sanctions System
- the appointment of a Supervisory Board

The 231 Organisational Model

With the regulations set forth by Legislative Decree No. 231 of 8 June 2001, as amended and supplemented (hereinafter also referred to as 'Legislative Decree' or 'Decree'), the Italian legal system envisaged that a company may be held criminally liable should its representatives commit certain offences expressly provided for in the Decree in the interest or to the advantage of the Company. This liability takes the form of administrative sanctions of a monetary nature and prohibition sanctions, concerning the exercise of the company's activity. However, the Decree itself provides for exemption from liability should the company prove that it has adopted appropriate measures to prevent such offences from being committed. Measures that consist in identifying the activities which may lead to offences being committed, by drawing up specific protocols aimed at providing measures to reduce the risk of offences being committed, by adopting a company code of ethics, by adopting a system of sanctions to ensure compliance with the Model, by appointing a Supervisory Board to ensure the effectiveness and updating of the Model, by implementing training and information activities for employees, consultants, suppliers and all interested parties.

The Code of Ethics and the Sanctions System

The Code of Ethics is a document drawn up in written form, which incorporates the concepts, principles of conduct and commitments that the company and each employee and collaborator undertakes on a reciprocal basis, also towards third parties. The purpose of the Code of Ethics is to transfer to all employees, directors and internal and external collaborators the duty to observe ethical behaviour in all circumstances.

The sanctions system provided for in Article 6 of Legislative Decree 231/01 is a necessary condition for the validity of the Organisational Model aimed at preventing crime risks within the company. The Model imposes conduct and compliance with principles and protocols and must necessarily provide for sanctions that punish conduct that does not comply with the established rules. The identification of sanctions and the procedure for imposing them are described in the Sanctions System.

The Supervisory Body

This is the body entrusted with monitoring the implementation of the model, assessing its adequacy and effectiveness, providing feedback to the company's administrative body, proposing amendments and any need for updating, arising from the results of monitoring, changes in the company's activities or amendments/additions to the stated offences

issued by the legislator. In addition to what emerges from direct audits by the Supervisory Board, reports of conduct, activities or situations that could subject the company to the risk of offences are to be forwarded to the latter by all interested parties. The procedures for making reports are set out in the implementing regulation of the General Section 'Information Flows'. The task has been entrusted to Elena Gaiofatto, Chiara Querini, Federica Spoto (in-house member).

By adopting an Organisation and Management Model, the company intends to

- raise the awareness of all parties that collaborate, in various roles, with ALPE-ADRIA TEXTIL S.R.L. (employees, consultants, suppliers, and whosoever.), requiring them, for the activities carried out in the interest of the Company, to adopt correct and transparent behaviour, in line with the ethical values that inspire it in the pursuit of its corporate purpose
- make all interested parties aware of the risk of incurring criminal or administrative sanctions if they violate the provisions issued by the company
- establish, as well as strengthen, control measures enabling the Company to prevent the committing of offences by senior and non-senior persons
- enable the Company, by monitoring the areas of activity at risk, to intervene promptly in order to prevent or counteract the committing of offences and to sanction any conduct contrary to the provisions of the Model
- guarantee its integrity, by fulfilling the conditions expressly provided for in Article 6 of the Decree
- improve effectiveness and transparency in the management of company activities
- make potential offenders aware that any offence shall be reported by the Company and is against the ethical principles to which the Company intends to adhere, as well as against the provisions of the law.

All interested parties may consult the documentation described above at *AAT – QUALITA’/MOG231*.

The training activity on Legislative Decree 231/01 and the Organisational Model of ALPE-ADRIA TEXTIL S.R.L. shall be scheduled and communicated to all interested parties shortly.

Trusting in your understanding of the importance of the above and therefore of the closest and most effective cooperation for the achievement of the common objectives by everyone involved, we thank you for your attention.

Best regards.

Remanzacco, 27/02/2023

The Board of Directors of ALPE-ADRIA TEXTIL S.R.L.

