

CODE OF CONDUCT

RELAXSHOE S.R.L.

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2 Company Information

Relaxshoe s.r.l. is a historical company in the Verona footwear industry dedicated to producing and marketing leather, rubber, and injection-moulded plastic footwear. Thanks to the far-sightedness, passion, and great disposition of its founder, Gianfranco Modenese, as well as the firmness of his decisions and hard work, the company has established itself internationally as serious, strong, and a mark of quality.

The company is distinguished in the sector for its brands:

Relaxshoe, a historical brand, a must for the company aimed primarily at the foreign market

Easy'nRose Classic, top of the line among leather shoes, sophisticated and exclusive
Easy'nRose Free Life the youthful line, in step with market trends and demands
Galmod, imagination and creativity in the world of plastic and rubber footwear

Moreover, for several years, Gianfranco Modenese has relied on the precious support of his sons, first Gianluca and now Giuseppe and Paolo, who, with a solid union of intentions, have made their father's passion their own, enriching Relaxshoe Srl with renewed impetus, ideas, and skills and laying the basis for continuity along this admirable entrepreneurial path.

A path that — naturally — always focuses on shoes marked by style, comfort, and quality.

3 Scope of Application

This Code of Conduct applies to all employees and collaborators of Relaxshoe s.r.l. and establishes rules for their conduct.

It must be considered as guidelines for daily work, to allow each individual to make decisions in accordance with the laws and company values and protect Relaxshoe s.r.l. and all those who come into daily contact with the company.

The rules contained in this Code of Conduct are binding.

The principles of conduct outlined below also apply to relations with customers, suppliers, subcontractors, and other business partners, who are in turn called upon to abide by and comply with them.

Respect for the law, honesty, fairness, mutual respect, and trust are indispensable foundations of good business relations.

4 Principles of Conduct

4.1 Fairness, Honesty, and Integrity

Mutual trust, fairness, honesty, and integrity, both internally and externally, must guide our every action.

The image of Relaxshoe s.r.l. is the result of its employees' and collaborators' actions. Inappropriate behaviour is likely to tarnish the image of both the individual, his/her colleagues, and the company he/she belongs to.

Integrity, honesty, and fairness are the cornerstones of the corporate culture at Relaxshoe s.r.l.

4.2 Current Laws and Internal Regulations

Existing laws and internal regulations must be strictly adhered to. We are part of the society in which we operate and are therefore subject to its laws and rules.

Likewise, we must fulfil and respect contracts and business agreements with our partners.

4.3 Respect

We work with a sense of responsibility and mutual respect in interpersonal relations.

This principle applies not only to relations with business partners but also to all those who work at Relaxshoe s.r.l.

4.4 Human Rights and Personal Dignity

Relaxshoe s.r.l. and all related individuals recognise the primary value of human rights, respect them, and demand they be respected by suppliers and business partners.

Any form of discrimination, whether direct or indirect, as well as child labour or forced labour, is rejected, while the dignity of persons, personal interests, and personal rights of each individual are protected.

Any determinations made by the company regarding individuals are based exclusively on objective considerations, in compliance with the guidelines established by the ILO. Therefore, any form of child or forced labour and any form of discrimination based on ethnicity, religion, age, disability, sexual orientation, or gender are rejected.

Likewise, violence, intimidation, bullying, or sexual harassment are not tolerated in the workplace.

4.5 Occupational Safety

Relaxshoe s.r.l. recognises the importance of a working environment that complies with health and safety regulations.

All necessary measures are therefore taken to ensure compliance with all provisions, laws, and regulations on workplace health and safety to provide employees with a safe and healthy working environment.

4.6 Working Hours and Rest

Relaxshoe s.r.l. recognises the importance of rest to recover energy for work and expressly undertakes to comply with the law and internal regulations on working hours, breaks, and rest.

4.7 Environmental Protection

Relaxshoe s.r.l. is aware of the finite nature of some natural resources and is therefore committed to using them rationally and in an ecologically sensible manner, avoiding unnecessary waste.

The company's mission is to respect the environment and nature by behaving responsibly and proactively and by complying with current laws on environmental protection and sustainability.

Relaxshoe s.r.l. encourages all its employees and collaborators, as well as all suppliers and business partners, to take appropriate action to reduce the waste of resources and prevent pollution.

5 Relations with Business Partners

The ethical behavioural principles described in this code of conduct also apply to relations with customers, suppliers, and other business partners, who are mutually obliged to comply with them to establish a correct, long-lasting business relationship with the undersigned company.

5.1 Bribery and Corruption

Relaxshoe s.r.l. rejects all forms of corruption and bribery and does not offer/provide improper favours or request/accept them.

We strictly reject improper payments to obtain orders or accelerate internal procedures, and we respect our business partners' guidelines on accepting and granting gifts. These principles apply not only to all employees, but also to all other individuals, collaborators, and organisations acting on behalf of or in the interests of Relaxshoe s.r.l.

5.2 Fair Competition

Relaxshoe s.r.l. undertakes to compete fairly with industrial competitors and refrains from promoting agreements to the disadvantage of competitors, as well as collusive, predatory, or abusive behaviour.

No company management, employees, or collaborators will make formal agreements or other agreements with competitors to fix prices or divide markets, territories, or customers.

If a competitor tries to persuade a company employee to enter into an unlawful agreement, he/she shall immediately report this to the relevant departments, which will take appropriate action.

5.3 Fraud and Money Laundering

The company is firmly opposed to laundering money of illicit origin and to financing illegal and/or terrorist activities and undertakes to report any suspicions to the competent authorities.

Likewise, business relationships will only be conducted with reputable partners financed by legitimate sources.

6 Conflicts of Interest

Personal or family interests may conflict with the interests of Relaxshoe s.r.l.

In such cases, the conflict of interest may negatively impact the integrity and professionalism of the individual, as well as the success of the company, and must therefore be reported without delay.

For company employees, the company's interests must take priority over personal interests, especially in cases of competing personal interests, shareholdings in competing companies, and the pursuit of other work.

7 Data and Information Processing

Relaxshoe s.r.l. undertakes to treat personal data and confidential/private information in accordance with applicable legislation.

This information and data may not be provided to unauthorised persons, either internal or external, and must be protected against unauthorised access.

Confidential information includes, for example, information on customers, company partners and the market in general, reports, internal communications, and company directives or other trade/industrial secrets.

Only competent, authorised offices may provide information externally.

8 Management Obligations and Subjects of the Code of Conduct

Relaxshoe s.r.l. management is available to employees and collaborators for any questions relating to this Code of Conduct, providing support in fulfilling the related obligations.

This availability does not, of course, exempt employees and collaborators from its fulfilment.

Their duties also include the obligation to report violations of the Code of Conduct itself, which will be treated confidentially by the company.

Those who report violations will not suffer any retaliation.

9 Implementation of the Code of Conduct

Relaxshoe s.r.l. undertakes to ensure maximum dissemination of the Code of Conduct to all internal and external stakeholders by means of appropriate communication activities, publishing it on the company website and undertaking to inform subjects of the methods necessary to retrieve it.

9.1. Reports

Any stakeholder may report a breach of the Code of Conduct to the competent office in charge of its implementation in writing and non-anonymously, on paper or via the dedicated e-mail address *gianfranco.modenese@relaxshoe.it*. The office will analyse the report and, if necessary, hear from the author of the report and the individual responsible for the alleged breach.

9.2. Violations

Any violation of the provisions of this Code constitutes a breach of contract and, if committed by employees, also constitutes an offence liable to disciplinary action.

In the most serious cases regarding collaborators, suppliers, and business partners, on the other hand, Relaxshoe s.r.l. will assess the termination of existing contracts without prejudice to the claim for compensation for damages suffered.

10 Final Provisions

This Code of Conduct was approved by the Relaxshoe s.r.l. Board of Directors on 10/02/2023.

The ethical principles constituting this Code of Conduct hold essential contractual value.