

CODE OF ETHICS

DEVOTO DESIGN SRL



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DESIGN

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1. GENERAL TERMS

Devoto Design (DD) creates spaces and custom-made furnishings for private residences, hotels, shops, and collective spaces, operating both domestically and internationally. As a dynamic company, ready to meet the ever-new challenges of the market, DD supports clients in defining their ideas, in design, in the analysis of technical and economic feasibility, and in the management of the project implementation process.

Through the synthesis of "know-how" and "know-how-to", through study, its consolidated expertise over time, research, and experimentation, DD can find solutions for all projects, committed to offering its clients the highest quality standards, guaranteed by the professionalism and experience of its operators, constantly engaged in research and innovation, in the use of innovative technologies, and continuous training.

The services offered by DD reflect the values of ethics, quality, and integrity that are an integral part of the company policy, values that employees and collaborators respect and make their own.

The drafting and adoption of a Code of Ethics aims not only to make visible the values that inspire the company in carrying out its activities and to which it conforms its conduct but also to guarantee compliance with the purposes of Decree 8 June 2001 no. 231 (hereinafter also the "Decree"), which introduced, into the Italian legal system, the administrative liability of entities.

DD recognizes the centrality of human resources in the belief that any company's most significant success factor is guaranteed by the professional contribution of the people who work there, in an environment of loyalty and mutual trust.

The company recognizes, as a fundamental principle of its corporate policy, respect for people, for work and therefore for wages, for opinions and ideas, recognizing the importance of everyone's professional contribution.

The company condemns all forms of discrimination based on:

- sexual orientation,
- age,
- social background,
- political beliefs,



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- ethnicity,
- religion.

DD is committed to ensuring **equal opportunities** for all employees, based on merit and without any discrimination, regardless of their level or position within the organization.

Employees are expected to operate in a climate of loyalty and respect for their commitments.

2. APPLICATION AREA AND RECIPIENTS

DD conducts its business under the principles of honesty, integrity, professionalism, and loyalty, and in compliance with all applicable laws and regulations.

The Company's Management is responsible for defining and sharing this Code of Ethics, working to ensure the participation and involvement of all its members.

All employees, collaborators, representatives, and agents (hereinafter referred to as "Recipients") are required to comply with this Code of Ethics.

DD is committed to sharing this Code of Ethics with all Recipients to ensure that they conduct their work activities in accordance with its principles and values.

In addition, Recipients are encouraged to share the principles of this Code of Ethics with third parties, such as clients, suppliers, and business partners. The company is committed to ensuring that all third parties who interact with DD are aware of and understand this Code.

3. DEVOTO DESIGN VALUES

The core values and principles that drive DD are:

- **Honesty:** In carrying out their work, employees, and collaborators must pursue the company's interests, avoiding any situation where they are, or may even appear to be, in a conflict of interest (whether personal, family-related, or involving third parties, which is distinct from DD's interests)



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- **Openness:** The company is committed to operating with full transparency. This involves sharing information about its performance, strategies, internal processes, and procedures with its customers, business partners, suppliers, and employees
- **Respect for people, space, assets, and relationships:** The company recognizes its human resources as its key to success. It values employee well-being and provides the necessary tools and facilities to facilitate heavy work and reduce physical and mental strain. In return, the company expects employees to respect the provided spaces and assets. Furthermore, the company promotes a culture of mutual respect and courtesy in all interpersonal relationships. All employees are responsible for conveying trust, project management skills, the ability to handle unexpected situations, and a deep understanding of customer needs, both through their work and their behavior
- **Resilience:** DD firmly believes in its ability to respond to changes and negative events that could destabilize its target markets and overall business. Over the years, the company has demonstrated its capacity to adapt to new commercial, social, and political scenarios, revising its strategies while still achieving its objectives
- **Collective Intelligence:** Recognizing that professionalism is acquired through practice, experience, and continuous learning, DD values the significant contribution of its senior professionals. The company promotes the transfer of knowledge and professional attitudes from experienced employees to younger staff, fostering best practices and a collective intelligence that benefits everyone
- **Engagement:** The company believes strongly in the engagement of its employees in its activities and the pursuit of its strategic objectives, making them feel part of a mission
- **Continuous Improvement:** Through experimentation, research, innovation, and training, DD is committed to ongoing improvement. By enhancing our knowledge and skills, we aim to stay competitive and provide our customers with the best possible solutions
- **Environmental Responsibility:** DD is committed to environmental sustainability. The company is FSC certified, uses eco-friendly materials, and promotes sustainable practices throughout its operations
- **Responsibility towards society and the market:** This means being aware of the consequences that the company's activities, both directly and indirectly, can have on the economic world
- **Condemnation of any type of discrimination,** whether sexual, religious, ethnic, demographic, political or social. (see Gender Equality Policy)



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4. COMPLIANCE WITH LAWS AND RULES OF CONDUCT

All DD employees must follow all laws and company rules while at work. If any employee thinks someone is breaking a law or a company rule, they should tell their manager right away. The manager will look into it and decide what to do.

5. GENDER EQUALITY POLICY

Devoto Design has decided to adopt a Gender Equality Management System (GEMS) compliant with UNI/PdR125:2022. This system represents a valuable tool to ensure gender equality in terms of the presence and professional growth of women, promoting an inclusive culture and activating processes that can develop women's empowerment. The guiding principles behind the adoption of this certification are: impartiality and inclusivity, fairness and transparency, valuing personnel, protecting individuals, combating all forms of violence and discrimination, and respecting individuals, spaces, property, and relationships.

6. CONFIDENTIALITY

In the course of activities carried out on behalf of DD, Recipients may have to handle confidential information. Whether this information is important for the company's stability or the protection of third-party interests, DD guarantees the confidentiality of the information in its possession and refrains from using it without the authorization of the intellectual property owner and, in any case, in strict compliance with the current legislation on Privacy and intellectual property. Employees and collaborators are required to handle only the data necessary to carry out specific activities, as well as to communicate and disclose the same in strict compliance with the specific company procedures. The same employees and collaborators are responsible for the proper management of such information. DD strictly prohibits the use, for personal purposes or on behalf of third parties, of price-sensitive information, that is, non-public information concerning, directly or indirectly, the costs and rates used by the company.

7. PREVENTION OF CORRUPTION



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DD condemns any form of corrupt practice and requires all those acting in its name and/or on its behalf to ensure that all actions and operations (especially commercial ones) with third parties are managed according to principles of integrity and transparency, in compliance with national and international regulations. Specifically, DD prohibits employees and collaborators from promising or offering to third parties, directly or indirectly, benefits in cash or in kind, in order to obtain an improper advantage and from accepting money or other benefits from third parties that are not justified by commercial practice.

8. ANTI-MONEY LAUNDERING

Recipients must not, under any circumstances, be involved in activities related to money laundering or self-laundering of proceeds from illicit or criminal activities.

Before establishing relationships or entering into contracts with suppliers and other business partners, the company (through its employees and/or collaborators) must verify their moral integrity.

9. PROTECTION OF COMPETITION

DD recognizes that healthy and fair competition contributes to the continuous improvement of its business objectives. DD believes in market competitiveness and observes the applicable competition laws, prohibiting its employees and collaborators from engaging in unfair competition and, in general, any violation of antitrust regulations.

DD believes in fair relationships with competitors and is committed to ensuring that activities related to the collection and analysis of information about competitors' activities are carried out with the utmost integrity and in compliance with applicable laws.

10. RELATIONSHIP WITH THIRD PARTIES



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The company aims to build trust with all its potential stakeholders, whether they are individuals, companies, or institutions, be they employees, customers, suppliers, business partners, or social organizations.

In carrying out its activities, DD conforms to the principles of loyalty and fairness, requiring all those who work on its behalf to behave honestly, transparently, and in compliance with the law in all their dealings, not tolerating corrupt or preferential conduct.

10.1 CLIENTS

According to our values and recognizing that each client has unique needs and expectations, which represent opportunities for growth, DD's relationships with clients (both private and public) are always characterized by integrity, honesty, fairness, respect, and mutual trust.

10.2 SUPPLIERS

Similarly, DD manages relationships with suppliers with loyalty, fairness, and professionalism, encouraging ongoing collaborations and solid, long-lasting relationships.

Supplier selection is based on objective and impartial evaluations, grounded in the quality, price, and environmental impact of their products.

Relationships with suppliers are based on the following principles:

- 1) Purchasing is entrusted to a dedicated department.
- 2) The company does not practice any form of "reciprocity": goods and services sought by DD are purchased exclusively based on their value in terms of price and quality.
- 3) Any negotiation with a supplier, current or potential, must exclusively concern the goods and services being negotiated with the supplier.
- 4) Personnel responsible for purchasing goods and services must not be subject to any form of pressure from suppliers to donate materials, products, and/or sums of money to charities or similar organizations

10.3 PUBLIC INSTITUTES



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Relationships with Public Institutions, including bodies, representatives, mandataries, exponents, members, employees, consultants, and individuals entrusted with public functions, of Public Institutions, Supervisory Authorities and/or other Independent Administrative Authorities, must be based on the strictest compliance with applicable laws and regulations; such relationships are the exclusive responsibility of those authorized to do so based on decisions by the Management. In any case, DD is committed to maintaining a relationship of maximum cooperation with the aforementioned parties, based on transparency and fairness.

10.4 SOCIAL ORGANIZATIONS

DD is committed to contributing to the economic well-being and growth of the community in which it operates. To this end, in carrying out its activities, DD is committed to respecting local and national communities, and fostering dialogue with associations. DD promotes and supports social, sports, humanitarian, and cultural initiatives aimed at improving living conditions and promoting a culture of peace and solidarity.

10.5 UNIVERSITIES, SCHOOLS AND ACADEMIES

DD firmly believes in collaborating with universities, schools, and academies to educate students. In particular, DD organizes training days and thematic conferences at its headquarters to share its knowledge and experience in the world of design; furthermore, it has several training programs in place with local universities and academies for the activation of curricular internships.

11. VIOLATIONS AND SANCTIONS

Employees and collaborators, in the event that they become aware of alleged violations of this Code of Ethics or company regulations, must immediately inform their respective area manager. If the matter is not resolved, they may consult the HR manager, who will verify the validity of the alleged violations by questioning, if necessary, the person who made the report and/or the alleged perpetrator.

Moreover, information related to official acts resulting from non-compliance with the provisions of Decree 231/2001 must be obligatorily transmitted to the Management. Examples include measures taken by judicial police authorities, requests for legal assistance submitted by managers and/or employees in the event of legal proceedings, etc.



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Compliance with the provisions of this Code of Ethics is an essential part of the contractual obligations of employees, pursuant to and for the purposes of Article 2104 of the Italian Civil Code. Any violation of the provisions of the Code of Ethics may constitute a breach of the employment contract and/or a disciplinary offense, in accordance with the procedures provided for in Article 7 of the Workers' Statute and applicable collective bargaining agreements, with all legal consequences, including with regard to the continuation of the employment relationship, and may result in compensation for any damages caused.

Compliance with the principles of this Code of Ethics is part of the contractual obligations undertaken by collaborators, consultants, and other business partners of DD. Consequently, any violation of the provisions contained therein may constitute a breach of the contractual obligations undertaken, with all legal consequences in terms of termination of the contract or assignment, and compensation for damages incurred.



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