



CORPORATE CODE OF ETHICS



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1. About us and inspiring principles

We are a leader in the production of high-end lacquered furniture doors.

L.A.P.M. was founded in 1987 and has always been characterized by a constant search for improvement. It has established, maintained, and developed relationships over time with the main kitchen manufacturers in the world, to which it has always provided quality and service. The success of our company comes from the care of internal and external relationships.

L.A.P.M. it is first of all a company made up of people, called to make their professional contribution in compliance with an organizational system based on a set of shared moral principles and standards of ethical-professional behavior, which this code identifies.

2. Scope and recipient

L.A.P.M. is aware that ethics constitutes a primary value and that principles such as respect, honesty, transparency, reliability, and legality inspire the way it acts in all the activities that characterize its mission. L.A.P.M. has defined with this code the guidelines to which they must be the behavior of staff and third parties is influenced, both in internal relations and in relations with the outside.

The code of ethics is an integral part of the employment relationship and compliance with the rules contained therein must be considered an essential part of the obligations of employees, collaborators, administrators, customers, suppliers, and all those who enter into relationships with L.A.P.M., within the scope of their functions and responsibilities.

All recipients of this code are obliged to know the relevant rules and abstain from behavior contrary to them, are required to observe and enforce the mandatory rules and principles of this code of ethics and to contact their superior or the responsible ethics committee for clarifications or complaints: the purpose of these rules is in fact to prevent any violations and not to repair harmful consequences.

They will also have to cooperate with the structure responsible for verifying violations.

3. Ethics in everyday routine and internal relationships

Respecting the code of ethics in everyday life means building collaborative relationships in the work environment, providing one's service to colleagues and collaborators, respecting the values of honesty, transparency, reliability, legality, and respect.

Specifically:

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- a. Relationships between colleagues must be civil coexistence with respect for rights, freedom and equal social dignity, excluding any type of discrimination.
- b. Any relationship must be based on respect, courtesy, discussion, communication, collaboration, teamwork, transparency, and loyalty.

Furthermore, in everyday life, every recipient of this code must adopt the following:

- c. actively contribute, with their conduct and behavior, to the well-being and prosperity of the company.
- d. Respect the prevention and protection measures put in place to protect safety.
- e. Guarantee and protect the confidentiality of company information by avoiding improper and unauthorized use of such information and data.
- f. undertake to maintain a decent appearance and to use language marked by kindness, courtesy and good manners.
- g. preserve and use with care and diligence the company assets, both tangible and intangible, at his disposal for the performance of his duties, avoiding improper use.
- h. Keep the workplace tidy and clean
- i. Avoid pursuing, in carrying out during their working activity, personal interests that conflict with the interests of L.A.P.M.

4. L.A.P.M. undertakings

The first source of success for LAPM are its employees and collaborators.

Taking care of their safety and well-being represent constant commitments and objectives for the Company.

To protect their safety, L.A.P.M. takes a position of absolute rigor in compliance with the regulations and provisions in force on the subject, always putting the protection of their health and well-being at the center of every choice and creating an adequate working environment, adopting all the necessary measures. As regards the protection of well-being, L.A.P.M. is committed to promoting an environment characterized by a serene climate and a spirit of sharing and collaboration where everyone can express themselves to the fullest.

In this regard L.A.P.M. undertakes to:


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- a. Contribute to the creation of a company climate in which each resource feels involved in the project and an active part in achieving company objectives.
- b. Promote initiatives and interventions aimed at developing positive and effective relationships in the work environment.
- c. Offer equal job opportunities and professional development based on the criteria of merit, competence, and adherence to company values, without any form of discrimination or favoritism.
- d. Promote professional development through specific training and refresher activities aimed at increasing skills.
- e. Protect, according to the terms established by law, personal information and activate all useful measures to avoid improper use of such information.
- f. Define objectives that are consistent with the mission, values and corporate goals.

• HUMAN RIGHTS

L.A.P.M. condemns the propaganda of ideas based on racial or ethnic superiority or hatred or the instigation and incitement to commit acts of discrimination for racial, ethnic, national or religious reasons, committed in such a way that there is a concrete danger of the spread of the ideas themselves, which are based in whole or in part on the denial, gross minimization or apology of the Shoah or the crimes of genocide, crimes against humanity and war crimes, as defined in Articles 6, 7 and 8 of the statute of the International Criminal Court, ratified pursuant to law 12 July 1999, n. 232.

L.A.P.M. undertakes to avoid any discrimination based on age, sex, sexuality, state of health, race, nationality, political opinions, and religious beliefs.

L.A.P.M. also condemns any form of recruitment, employment, use or hiring of labor, including through intermediation activities, subjecting workers to exploitative conditions and taking advantage of their state of need.

5 EQUAL OPPORTUNITIES BETWEEN MEN AND WOMEN

L.A.P.M. encourages and promotes equal opportunities between women and men and is committed to ensuring that it is prohibited, in accordance with the principles contained in the Legislative Decree. 198/2006, any act, agreement, or behavior, whether direct or indirect, which produces a prejudicial and discriminatory effect for workers due to their sex.

6 PROHIBITION OF CHILD EXPLOITATION

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L.A.P.M. SRL does not employ personnel younger than the minimum age required to carry out a work activity. Persons under the age of 18 are not employed for dangerous work or any work activity that conflicts with the personal development of the minor.

L.A.P.M. SRL undertakes not to draw up contracts with third parties or possibly to terminate them, if it detects or becomes aware of forms of child exploitation by the third parties themselves.

L.A.P.M. SRL undertakes to report to the competent authority any forms of exploitation of child labor of which it becomes aware in the context of its commercial relationships.

7 PROHIBITION OF FORCED LABOR

L.A.P.M. SRL does not use any form of forced, bonded or compulsory labour, prohibits foul language, verbal abuse and insults towards people and undertakes to contrast and sanction such behaviour.

8 THE CARE FOR ENVIRONMENT

The quality of L.A.P.M. products cannot ignore particular attention to the territory and the environment in which it operates.

L.A.P.M. has always been committed to protecting and safeguarding the environment, investing in "clean" production technologies with low environmental impact and in careful waste disposal.

All recipients of this code have a personal responsibility to contribute to reducing environmental impact, even with small daily gestures.

All employees and, more generally, the Recipients of this Code of Ethics are required to respect and scrupulously follow the operating procedures required by the certifications of which L.A.P.M. already boasts (FSC, PEFC, ISO 9001:2015, ISO 14001:2015) and those that the Company intends to adopt in the future.

9 RELATIONS WITH THE MARKET

For L.A.P.M. the choice of suppliers represents a fundamental element to guarantee the market the quality of its products and promote collaborations inspired by the values in which it believes.

Through a monthly evaluation system, L.A.P.M. promotes, among its Suppliers, compliance with the principles of ethical and quality collaboration, carrying out specific audits on them and making the continuation of the relationship subject to compliance with these mandatory criteria and values, as well as the relevant regulatory provisions.

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Commercial relationships with suppliers are carried out in compliance with the criteria of fairness, cost-effectiveness, transparency, loyalty and honesty, avoiding relationships that could generate personal advantages or conflicts of interest.

The relationship with customers is pursued daily and translates into long-lasting relationships of trust, fueled by L.A.P.M.'s constant commitment to guarantee the required product quality, in line with the requirements of the ISO 9001 standards. Furthermore, it is committed to guaranteeing a quality service, in which attention to the customer and his needs represents the first source of success for L.A.P.M.

10 COMPLIANCE WITH REGULATIONS

This Code of Ethics constitutes an integral part of the Organization and Management Model pursuant to Legislative Decree 231/2001 through which L.A.P.M. intends to conform its actions to rigorous compliance with the principle of legality.

As a tangible practical interpretation of the principle of legality L.A.P.M.:

- promotes fairness and fair competition and undertakes to respect every counterpart, including competitors;
- opposes any corrupt practices aimed at obtaining undue advantages, both with reference to relations with Public Administrations and Public Entities in general, and with Private Entities;
- rejects any commercial practice that involves the possession and use of child pornography as well as the promotion of so-called child pornography practices. sex tourism;
- respects the private property of others and therefore repudiates all tools and practices aimed at violating the integrity of the IT systems of Public Administrations and Private Entities;
- promotes a transparent, loyal and cooperative relationship with the Judicial Authority and with supervisory bodies in general;
- employs the best competence available internally and from its external collaborators to comply with all tax and social security obligations;

L.A.P.M. undertakes to prevent the use of its economic-financial system for the purposes of money laundering and financing of any criminal activity by its Customers, Suppliers, Employees, and counterparties with which it interacts in carrying out its activities and refuses relationships of any kind with counterparties believed to be involved in criminal activities of any kind.

11 REPORTS, VIOLATIONS AND SANCTIONS

Anyone who reasonably believes that a violation has been committed of the rules prescribed by this Code of Ethics and, more generally, of the rules of the MOG pursuant to Legislative Decree 231/2001, can make a report according to the procedure and with the guarantees indicated in the CRIME REPORTING REGULATION (WHISTLEBLOWING) available at the following link: <https://lapmsrl.segnalazioni.net/>

The same procedure can also be used for reports regarding facts/occurrences relating to the SA8000 System also known as "Social Responsibility" as well as to the Pdr125 Certification relating to gender equality.

12 IMPLEMENTATION AND COMMUNICATION

This Code of Conduct is adopted by resolution of the Board of Directors of L.A.P.M. which ensures adequate internal and external communication with maximum diffusion.

L.A.P.M. undertakes to give adequate publicity to this code of ethics by publishing it on the website and company portal, posting it in the registered office and making it available to employees, collaborators, and external parties.

L.A.P.M. also undertakes to guarantee adequate training and awareness regarding the values and rules contained in this code of ethics, so that anyone can align their behavior with those prescribed here.

Each update will be adopted with a subsequent resolution of the Board of Directors.