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Revision no.	Date	REASON	Approval
0	06/02/2025	Prima Emissione	

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1. INTRODUCTION

Lube Srl considers it essential to establish and maintain positive relationships with employees, collaborators, customers, suppliers, managers, and administrators involved in business processes, fostering trust and operating in compliance with national and international laws and regulations.

Our commitment is to combat all forms of discrimination based on gender, ethnicity, culture, personal and social conditions, religious and political beliefs, and to adopt production practices that minimize the environmental impact of our activities and prevent offenses.

This Code of Ethics sets forth the values we pursue and have shared with stakeholders over the years through our corporate policies and Code of Conduct. We recognize our role as a socially responsible company that must inspire trust and positivity within the community and society as a whole.

The Code of Ethics supplements the behavioral rules established by legislators: while compliance with the law is fundamental, it is not always sufficient. Therefore, we require all business decisions and daily behavior to be guided by ethical principles, even when not explicitly mandated by law.


2. WHO WE ARE

LUBE was founded in 1962 by the parents of the current owner, Claudio Lunardi, under the name Lube. For approximately 25 years, production focused on knitwear, finished women's products, and accessories for the garment industry. Over time, the company underwent a transformation, specializing exclusively in accessories and offering a stock service for ready-to-ship yarns. Today, LUBE focuses on high-quality, trendy products, serving top international brands.

3. GENERAL PRINCIPLES

To achieve our objectives, we adhere to the following principles:

- Compliance with all applicable national and international laws and regulations.
- Respect for individuals.
- Promotion of equality and impartiality.
- Honesty, transparency, and reliability.
- Guarantee of confidentiality.
- Demonstration of loyalty, fairness, and good faith.
- Commitment to environmental protection and territorial integrity.

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- Priority on workplace health and safety.
- Respect for competition as an essential tool for economic development.

4. RECIPIENTS

The provisions of this Code of Ethics apply to:

- Administrators
- Shareholders
- Executives
- Employees and external collaborators, as well as all those who maintain even temporary relationships with the company, such as subcontractors and suppliers
- Customers and all those engaged in business activities related to the development, production, promotion, distribution, and sale of products

Recipients of the Code of Ethics are required to:

- Abstain from behaviors contrary to the rules of the Code and ensure compliance with them.
- Seek clarification from superiors or competent departments on how to apply the Code's provisions when necessary.
- Promptly report to superiors or relevant departments any acts or behaviors that violate the law and/or the Code's provisions.

5. COMMUNICATION, IMPLEMENTATION, AND CONTROL

LUBE commits to disseminating and ensuring compliance with this Code among all recipients through:

- Publication of the Code on its website.
- Direct communication with stakeholders.
- Inclusion of the Code in supplier contracts and evaluation criteria.
- Periodic monitoring and/or on-site audits.

LUBE Management ensures:

- Distribution of the Code among employees, external collaborators, suppliers, partners, and other third parties.

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- Support in interpreting and implementing the Code.
- Enforcement and compliance with the Code of Ethics and organizational models.
- Necessary actions in case of Code violations.
- Updating the Code as required.

6. FAIRNESS, HONESTY, ETHICS, TRANSPARENCY, CONFIDENTIALITY

Every action by recipients must align with the mission and values of this Code, respecting national and international laws, general principles, and current regulations.

Under no circumstances can the pursuit of corporate interests justify unethical or illegal conduct.

Transparency entails providing clear, complete, and periodic information both internally and externally, including accurate financial reporting. Confidentiality of information is a fundamental principle that must be upheld by all parties, both during and after employment, in compliance with privacy laws and proper data management practices.

7. RELATIONSHIPS WITH SUPPLIERS AND CUSTOMERS

LUBE commits to conducting relations with suppliers and customers with integrity, transparency, and fairness. Supplier selection and evaluation processes consider factors such as quality, price, reliability, legal compliance, environmental sustainability, and human rights protection.

8. VALUE OF HUMAN RESOURCES

LUBE promotes the professional growth of employees through training and development programs based on merit and equal opportunities. The company opposes child and forced labor, supports the right to collective bargaining, and condemns discrimination based on ethnicity, nationality, religion, disability, gender, sexual orientation, or political affiliation.

9. USE OF CORPORATE TOOLS AND EQUIPMENT

Employees and collaborators must:

- Use corporate assets exclusively for work purposes.
- Avoid improper use that could lead to additional costs or inefficiencies.
- Prevent misuse by third parties.
- Report threats or damage to corporate assets.

10. ENVIRONMENTAL PROTECTION AND SUSTAINABLE DEVELOPMENT

LUBE is committed to:

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- Offering environmentally friendly products.
- Promoting energy efficiency and renewable resources.
- Reducing deforestation by using FSC-certified materials.
- Implementing waste recycling and pollution reduction measures.
- Monitoring and minimizing greenhouse gas emissions.

11.HEALTH AND SAFETY

LUBE ensures safe and healthy working conditions by:

- Complying with legal health and safety requirements.
- Promoting a safety culture through training and awareness initiatives.
- Maintaining adequate safety standards in equipment and workspaces.
- Encouraging employees to report risks and suggest improvements.

12.SUSTAINABILITY

LUBE integrates economic, social, and environmental values into its strategies to foster sustainable development and long-term relationships based on trust and reliability.

13.CODE OF ETHICS VIOLATIONS

Compliance with this Code is a contractual obligation for employees and business partners. Violations may result in disciplinary actions or contractual breaches. Management is responsible for monitoring compliance and reporting any irregularities to the General Management.

14.REPORTING

To ensure transparency and ethical conduct, LUBE has established reporting channels:

- Physical reporting boxes available in break areas.
- Email reporting via ESG@LUBE.it.

Reports are handled confidentially, and the company enforces a zero-tolerance policy against retaliation for good-faith reports.

15.FINAL PROVISIONS

This Code was ratified in February 2025. Any amendments will be subject to approval by the Administrator and communicated promptly to all recipients.



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del 06.02.25

Signature and Stamp

Administrator

A handwritten signature in black ink, appearing to read "Dana Kish", written over a light-colored rectangular stamp area.