CODE OF ETHICS



Code of ethics - 1

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LETTER WRITTEN BY MATTEO, CEO OF PROJECT

"DEAR STAKEHOLDER, CUSTOMER, COLLEAGUE, FRIEND,

IN RECENT YEARS WE HAVE WONDERED A LOT ABOUT THE PURPOSE OF PROJECT. AFTER CAREFULLY DEFINING OUR CORPORATE VISION, WE REALIZED THAT THE SLOGAN THAT COULD BEST REPRESENT ALL OUR VALUES WAS "PROJECT SUPPORTS DARING PEOPLE".

WITHIN THIS SLOGAN, SUSTAINABILITY PLAYS A KEY ROLE BECAUSE PROJECT IS A PLACE TO IMPROVE OF PEOPLE DESIGNED WELL-BEING INSIDE THE COMPANY, OUTSIDE ENCOURAGING EXPERIMENTATION, SHARING AND OPEN INNOVATION AND ENHANCING RELATIONSHIPS WITH STAKEHOLDERS IN ORDER TO CREATE A SOLID CHAIN SHARES THE SAME PRINC PRINCIPLES: CUSTOMER CENTRICITY, TRACED AND CERTIFIED SUPPLY CHAIN, OPEN INNOVATION.



PURSUING OUR VISION, WE NOTICED THAT PROJECT WAS GROWING IN TERMS OF TURNOVER AND VALUE THANKS TO SUSTAINABILITY. WE THEN GOT CONFIRMATION THAT IT WAS THE RIGHT WAY TO GO. CORPORATE SUSTAINABILITY HAS BECOME OUR BUSINESS STRATEGY, ORIENTING OURSELVES TOWARDS A COLLECTIVE PURPOSE CAPABLE OF GENERATING A POSITIVE SOCIAL, ETHICAL AND ECOLOGICAL IMPACT.

MOREOVER, THE PROFITS ARRIVED IMMEDIATELY, EVEN MORE THAN BEFORE, BUT THE MOST IMPORTANT THING IS THE INCREASE IN THE QUALITY OF OUR RELATIONSHIPS WITH PEOPLE IN THE COMPANY, WITH CUSTOMERS AND STAKEHOLDERS, BECAUSE THEY ARE FOCUSED ON SHARED VALUES AND OBJECTIVES.

WE THEREFORE FELT IT WAS IMPORTANT TO WRITE OUR CODE OF ETHICS IN ORDER TO BECOME A BENEFIT COMPANY. INDEED, IT IS FUNDAMENTAL TO TRANSMIT OUR VISION, OUR CORPORATE VALUES AND TO BEST REPRESENT THE TEAM. WE ARE GROWING, BOTH AS A COMPANY AND AS PEOPLE, AND I BELIEVE THAT THE CODE OF ETHICS MAY BE THE COMPASS NOT TO LOSE SIGHT OF OUR PRINCIPLES.

MUCH HAS BEEN DONE AND MUCH REMAINS TO BE DONE, BUT I AM CONVINCED THAT MY DARING PEOPLE WILL BE THRILLED TO CREATE OUR SUSTAINABLE FUTURE. "

Matteo Lavezzo, CEO of Project

WHAT THE CODE OF ETHICS REPRESENTS TO US, DARING PEOPLE

FOR ALL OF US, THE CODE OF ETHICS IS A WRITTEN DOCUMENT THAT CONTAINS OUR GUIDELINES FOR BEHAVIORAL AND SOCIAL RULES. THESE PRINCIPLES MUST BE SHARED BY ALL PROJECT PEOPLE, TOGETHER WITH OUR STAKEHOLDERS, IN ORDER TO REFLECT THE COMPANY SPIRIT THAT DISTINGUISHES US FROM OTHERS AND TO GO ALL IN THE SAME DIRECTION FOR THE SUSTAINABLE GROWTH OF PROJECT.

"THE TREE GROWS BY WATERING THE SEED!"

THE PROJECT PEOPLE

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Corlo	Maanzo	Jud	þ	Mensf
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THE CODE OF ETHICS OF PROJECT WAS CREATED WITH THE CONTRIBUTION OF ALL THE PEOPLE IN THE COMPANY AND WITH THE HELP OF ROMINA NORIS WHO GUIDED US THROUGH TWO TRAINING ACTIVITIES IN THE DRAFTING.

DURING THE FIRST MEETING, THE TEAM WORKED ON THE CHARTER OF VALUES, DEFINING THEM AND SHARING TOGETHER THE MEANING THAT EACH VALUE HELD FOR PEOPLE. THE SECOND MEETING, ON THE OTHER HAND, WAS DEDICATED TO DRAFTING THE ETHICAL PRINCIPLES AND OUR RELATIONSHIPS WITH STAKEHOLDERS.

EACH ETHICAL PRINCIPLE WAS ACCOMPANIED BY SOME QUESTIONS THAT THE TEAM MUST ASK EVERY DAY TO KEEP ALIVE THE SPIRIT OF THE COMPANY PRINCIPLES AND SOME SLOGANS EMERGED FROM THE GROUPS DURING THE TRAINING, TO ENCOURAGE THE TEAM TO PURSUE THEM.

THE DRAFTING OF THIS DOCUMENT THEREFORE TOOK INTO ACCOUNT THE VOICE OF EACH PERSON IN PROJECT.







WHO WE ARE

PROJECT IS A COMPANY THAT PRODUCES DENIM CLOTHING AND SPORTSWEAR FOR LUXURY BRANDS, OFFERING A UNIQUE, EFFICIENT AND PRECISE SERVICE, TOGETHER WITH AN ENERGETIC AND PROFESSIONAL TEAM. THE STRENGTH OF PROJECT IS ITS PEOPLE. PEOPLE WHO KNOW HOW TO IMAGINE, REINVENT AND SHAPE THE FUTURE OF FASHION.

FOR TWENTY YEARS, PROJECT HAS BEEN A VISIONARY, CREATIVE AND SHARING ENVIRONMENT THAT MERGES OFFICES, MODELING, PROTOTYPING, PRODUCTION DEPARTMENTS, SHOWROOMS, HISTORICAL ARCHIVES, ART EXHIBITIONS IN A SINGLE ENVIRONMENT.

A PLACE WHERE PEOPLE ARE INSPIRED TO GIVE THEIR BEST.

NOT JUST A COMPANY. PROJECT IS A PLACE THAT OFFERS AN EXCELLENT PRODUCT AND SERVICE, ENRICHED BY ALL ITS VALUES, PHILOSOPHY AND SHARED SYMBOLS. A SPACE WHERE IDEAS AND INNOVATIONS ARE IN CONSTANT FERMENT. CULTIVATING ROOTS AND RELATIONSHIPS, DEVELOPING CREATIVE, INNOVATIVE AND SUSTAINABLE PROJECTS WITH BRANDS THAT, LIKE PROJECT, LOOK TO THE FUTURE WITH THE AIM OF CONTRIBUTING TO SUSTAINABLE DEVELOPMENT.

PROJECT HAS CHOSEN TO BECOME A BENEFIT COMPANY BECAUSE IT WANTS TO COMMIT ITSELF WITH CONCRETE ACTIONS IN PURSUING ANNUALLY THE OBJECTIVES INDICATED IN ITS STATUTE AND ACCOUNT FOR THE RESULTS ACHIEVED THROUGH THE IMPACT REPORT MADE AVAILABLE TO STAKEHOLDERS.

PROJECT PURSUES FIVE OBJECTIVES OF COMMON BENEFIT:

- 1. WE SUPPORT OUR CERTIFIED AND LOCAL SUPPLY CHAIN, COMMITTING OURSELVES TO SPREADING THE THEME OF SUSTAINABILITY AND ETHICAL BEHAVIORS TO THE ITALIAN FASHION SUPPLY CHAIN THROUGH THE PROJECT "THE GHOST MAKERS".
- 2. PROJECT IS COMMITTED TO REDUCING ITS ENVIRONMENTAL IMPACT BY:
- RECYCLING AND REUSE OF PROCESSING WASTE (AND OTHER).
- SEPARATE COLLECTION OF WASTE.
- PRODUCTION OF ENERGY FROM RENEWABLE SOURCES
- · DIGITIZATION OF DOCUMENTS

- 3. PEOPLE ARE THE TRUE VALUE OF PROJECT. FOR THIS REASON, WE PAY GREAT ATTENTION TO THEIR WELL-BEING, INSIDE AND OUTSIDE THE COMPANY, CREATING INITIATIVES AND PROJECTS DESIGNED FOR THEIR HAPPINESS AND SERENITY.
- 4. CONTINUING TRAINING IS FUNDAMENTAL, BECAUSE EVERY PERSON IN PROJECT CONTRIBUTES TO THE GROWTH OF THE COMPANY. WE INVEST IN YOUNG TALENTS, ORGANIZING AND PROVIDING PERSONALIZED PROGRAMS FOR THEIR PERSONAL GROWTH.
- 5. WE USE OPEN INNOVATION PRACTICES, ENHANCING RELATIONSHIPS WITH INSTITUTIONS, ASSOCIATIONS, SCHOOLS, UNIVERSITIES...



OUR SLOGAN PROJECT SUPPORTS DARING PEŌPLE

PROJECT SUPPORTS DARING PEOPLE!

THIS SLOGAN ENCLOSES THE VISION OF PROJECT AND THE FUNDAMENTAL PILLARS OF MATTEO LAVEZZO. PROJECT IS A PLACE DESIGNED TO GUARANTEE THE WELL-BEING OF PEOPLE, THE COLLABORATION, THE EXPERIMENTATION AND THE OPEN INNOVATION, BRINGING TOGETHER THE RELATIONSHIPS THAT GROW CULTURE, ART AND HEALTH OF STAKEHOLDERS AND THE TERRITORY, IN RESPECT AND IMPROVEMENT OF THE ENVIRONMENT.

THE 4 KEY CONCEPTS THAT MAKE UP THE SLOGAN ARE: DARING SUPPORT PEOPLE ENSÕ(Õ)

DARING

THE PHRASE THAT ACCOMPANIED MATTEO LAVEZZO FOR ALL THE YEARS IS "FORTUNE FAVORS THE BOLD" (DARING).

SUPPORT

PROJECT SUPPORTS THE DARING PEOPLE WHO CHOOSE TO WORK WITH US, THE BRANDS WHO CHOOSE TO BE "OUT OF THE CHORUS" AND TO MAKE DIFFERENT PRODUCTS WITH SPECIAL PROCESSES. PROJECT SUPPORTS CREATIVE PEOPLE LIKE THE PRJT TEAM, WHO FACES CHALLENGES WITH AUDACITY AND PASSION. PROJECT SUPPORTS THE STAKEHOLDERS, THE GHOST MAKERS SUPPLY CHAIN, YOUNG PEOPLE, THE TERRITORY AND ALL THOSE WHO DECIDE TO BE BRAVE AND TO LOOK TO A SUSTAINABLE FUTURE, DIFFERENTIATING THEMSELVES FROM THE MASS.

PEOPLE

PEOPLE ARE THE HERITAGE OF THE COMPANY AND THE FOCUS OF EVERY STRATEGY, ACTIVITY, IMPROVEMENT AND INNOVATION THAT TAKES PLACE IN THE COMPANY.

ENSŌ

ABOVE PEOPLE'S O, THERE IS A DASH TO RECALL THE ENSO, WHICH REPRESENTS THE FORCE AND THE UNIVERSE IN JAPANESE SYMBOLOGY. IT IS OFTEN USED BY ZEN MASTERS AS A SIGNATURE IN THEIR WORKS. COMBINING THE CONCEPT WITH A HOLISTIC VISION, WE CAN THINK OF PROJECT AS A HUB THAT DAILY COLLABORATES WITH PEOPLE, INSTITUTIONS, SUPPLIERS, CUSTOMERS, ETC., TO GENERATE A VALUE THAT CAN CREATE ENDLESS POSSIBILITIES, PROJECTS AND OPPORTUNITIES.

OUR VALUES

DARING ENERGY (POSITIVITY+ENTHUSIASM) RESPECT SUSTAINABILITY PROFESSIONALISM SHARING HUMILITY TRUST COLLABORATION HONESTY

THE DARING PEOPLE OF PROJECT



THE ETHICAL PRINCIPLES OF PROJECT

PROJECT, TOGETHER WITH ITS DARING PEOPLE, HAS IDENTIFIED THE ETHICAL PRINCIPLES THAT INTENDS TO PRACTICE TO MAKE THEIR WAY OF WORKING TRANSPARENT, ETHICAL AND SUSTAINABLE IN RELATION TO ALL STAKEHOLDERS.

	ARING PEOPLE E SPIRITO DI SQUADRA
Д	FFIDABILITÀ E PROFESSIONALITÀ
R	ESPONSABILITÀ E INTEGRITÀ
	MPEGNO PER LA SOSTENIBILITÀ D'IMPRESA E PER LO SVILUPPO SOSTENIBILE
\overline{N}	ESSUN USO DI BENI E RISORSE AZIENDALI A FAVORE DEL CONFLITTO DI INTERESSE
G	ARANZIA, TRASPARENZA E CORRETTEZZA
P	REVENZIONE DELLA CORRUZIONE E RICICLAGGIO
Е	GUAGLIANZA E INCLUSIVITÀ
$\overline{\bigcirc}$	SSERVANZA DELLE LEGGI E DEI REGOLAMENTI COMPORTAMENTALI
P	ATRIMONIO INDUSTRIALE E INTELLETTUALE
L	EALTÀ E FIDUCIA
F	DUCAZIONE ALLA SICUREZZA E ALLA SALUTE DELLE PERSONE





IN PROJECT, EMPLOYEES ARE REQUIRED TO FOSTER GROUP WORK KNOWING THAT SUCCESS DEPENDS ON THE WHOLE TEAM THAT IS ABLE TO CREATE VALUE FOR THE SUSTAINABILITY OF THE COMPANY IN THE LONG TERM. FOR PROJECT, THIS MEANS THAT EMPLOYEES WORK TO BE BOLD AND OPEN IN SHARING THEIR HUMAN AND PROFESSIONAL POTENTIAL WITH THE TEAM TO GIVE ROOM FOR CONTINUOUS MUTUAL IMPROVEMENT.

EMPLOYEES ARE THEREFORE CALLED TO CREATE A SUSTAINABLE AND RESPONSIBLE CLIMATE BASED ON MUTUAL TRUST AND HUMILITY IN RESPECT OF ROLES AND ENHANCING THE CONTRIBUTION OF THE INDIVIDUAL PERSON FOR THE GOOD OF THE COMPANY.

FOR PEOPLE IN PROJECT

SHARE IDEAS WITH THE GROUP WITH CONFIDENCE, KNOWING THAT THESE CAN BE REALIZED THROUGH LISTENING, SUPPORT AND MUTUAL COLLABORATION, IN ORDER TO FACE ANY KIND OF CHALLENGE AND REACH THE CORPORATE GOALS OF PROJECT.

QUESTIONS AND REFLECTIONS TO PURSUE THE CONCEPT OF DARING PEOPLE AND THE TEAM SPIRIT

- · WHAT AM I WILLING TO DO TO BE DARING?
- · WHAT CAN I DO TO SUPPORT AND HELP MY COLLEAGUES?

SLOGAN

- · MORE DARING TEAM!
- · FORTUNE FAVORS THE BOLD!



ALL PROJECT ACTIVITIES ARE CARRIED OUT WITH DILIGENCE, PROFESSIONALISM AND RELIABILITY. THE EMPLOYEES THEREFORE HAVE TO CARRY OUT THE ACTIVITIES WITH A COMMITMENT APPROPRIATE TO THEIR RESPONSIBILITIES, ROLE AND TASKS, PROTECTING THE REPUTATION AND THE IMAGE OF PROJECT.

FOR PEOPLE IN PROJECT

TO BE ABLE TO COUNT ON PEOPLE WHO ARE TRUSTWORTHY AND COMPETENT IN THEIR DUTIES AND IN THEIR ABILITIES TO MANAGE THE WORKFLOWS AND THE UNFORESEEN IN ORDER TO WORK CONCRETELY AND RESPONSIBLY TO UNDERSTAND THE DEMANDS OF INTERNAL AND EXTERNAL STAKEHOLDERS IN COMPLIANCE WITH THE REQUIRED STANDARDS.

QUESTIONS AND REFLECTIONS TO PURSUE RELIABILITY AND PROFESSIONALISM

- · DO I MAKE MY SKILLS AVAILABLE TO THE TEAM?
- HOW DO I EXPRESS PROFESSIONALISM TOWARDS EXTERNAL STAKEHOLDERS?

SLOGAN

- · YOU PUT THE RESULT IN SAFE WITH US!
- · CLEAR AND CONCRETE!



FOR PROJECT

AS PART OF THEIR PROFESSIONAL ACTIVITY, ROLE, DUTIES AND RESPONSIBILITIES. PROJECT COLLABORATORS ARE REQUIRED TO DILIGENTLY COMPLY WITH THE LAWS, REGULATIONS, THIS CODE OF ETHICS AND THE INTERNAL COMPANY PROVISIONS. THEY ARE ALSO CALLED TO ACCOUNT FOR THEIR ACTIONS AND TO BEHAVE WITH MORAL INTEGRITY.

FOR PEOPLE IN PROJECT

TAKE CHARGE OF OUR OWN WORK WITH ROLE, TASKS AND CHOICES IN AN ETHICAL AND TRANSPARENT WAY IN ORDER TO CARRY OUT WITH CONSISTENCY THE PROJECTS ASSIGNED TO CONTRIBUTE TO THE ACHIEVEMENT OF SHARED BUSINESS OBJECTIVES.

OUESTIONS AND REFLECTIONS TO PURSUE RESPONSIBILITY AND INTEGRITY

- · ARE THEY ABLE TO MAKE CHOICES AND BEAR THE CONSEQUENCES?
- · WHAT CAN I DO TO GIVE THE BEST IN MY WORK KNOWING THAT I CONTRIBUTE TO THE SUSTAINABILITY OF THE COMPANY?

- · PICTURE THE RESULT, WE'LL DO THE REST! · PAY ATTENTION TO YOUR WORK TO GIVE YOUR BEST FOR THE COMPANY!

MPEGNO PER LA SOSTENIBILITÀ D'IMPRESA E PER LO SVILUPPO SOSTENIBILE COMMITMENT TOWARDS CORPORATE SUSTAINABILITY AND SUSTAINABLE DEVELOPMENT

FOR PROJECT

PROJECT CONDUCTS THE COMPANY'S ACTIVITIES WITH A VIEW TO SUSTAINABILITY, INTEGRATING ECONOMIC, ETHICAL, SOCIAL AND ENVIRONMENTAL REQUIREMENTS INTO ITS WORKING METHODS, IN ORDER TO SAFEGUARD THE ENVIRONMENT AND THE COMMUNITY AND TO CONTRIBUTE TO SUSTAINABLE DEVELOPMENT FOR PRESENT AND FUTURE GENERATIONS. ALSO THROUGH THE 2030 AGENDA.

FOR PEOPLE IN PROJECT

SUPPORTING PEOPLE THROUGH WELL-BEING, CONTRIBUTING TO THE TERRITORY THROUGH SOCIAL VALUE AND RESPECTING THE ENVIRONMENT THROUGH ATTENTION TO CONSUMPTION AND WASTE. EVERYONE CAN ACTIVELY CONTRIBUTE TO SUSTAINABLE DEVELOPMENT WITH DAILY ACTIONS IN THE COMPANY AND IN PRIVATE LIFE.

QUESTIONS AND REFLECTIONS TO PURSUE COMMITMENT TOWARDS CORPORATE SUSTAINABILITY AND SUSTAINABLE DEVELOPMENT

- ·DO I KNOW WHAT ECONOMIC, SOCIAL AND ENVIRONMENTAL SUSTAINABILITY MEANS FOR MY COMPANY?
- · HOW CAN I PLAY AN ACTIVE ROLE IN THE SUSTAINABILITY PATH OF MY COMPANY?

SLOGAN

· BE CAREFUL TO PRESERVE THE WORLD AROUND YOU!



ESSUN USO DI BENI E RISORSE AZIENDALI A FAVORE DEL CONFLITTO DI INTERESSE NO USE OF BUSINESS ASSETS AND RESOURCES IN FAVOR OF CONFLICT OF INTEREST

FOR PROJECT

PROJECT EMPLOYEES ARE REQUIRED TO USE THE COMPANY'S RESOURCES ACCURATELY, AVOIDING IMPROPER USE THAT MAY CAUSE DAMAGE AND REDUCE EFFICIENCY OR CONTRARY TO THE LAW OR THE INTEREST OF THE COMPANY. THEREFORE IT IS ASKED TO PUT THE GOOD OF THE COMPANY BEFORE THE PERSONAL INTEREST AND TO OPERATE LOYALLY WITHOUT ULTERIOR MOTIVE.

FOR PEOPLE IN PROJECT

USE THE ASSETS AND THE RESOURCES (WORKING TOOLS, COMPANY TOOLS, MATERIALS, ECONOMIC RESOURCES, ...) MADE AVAILABLE BY THE COMPANY TO BEST CARRY OUT ITS OWN WORK FOR THE GOOD OF THE COMPANY AND NOT IN PERSONAL INTEREST.

QUESTIONS AND REFLECTIONS TO PURSUE NO USE OF BUSINESS ASSETS AND RESOURCES IN FAVOUR OF CONFLICT OF INTEREST.

- \cdot AM I ACTING SOLELY IN MY OWN INTEREST OR IN THE INTERESTS OF THE COMPANY?
- · AM I RESPECTFULLY USING THE ASSETS AND THE RESOURCES THAT THE COMPANY MAKES AVAILABLE TO ME?

SLOGAN

- · BE LOYAL IN YOUR WAY OF OPERATING FOR THE COMPANY!
- THE COMPANY MAKES EVERY GOOD AVAILABLE TO YOU: TAKE CARE OF



PROJECT ENSURES TRANSPARENCY AND FAIRNESS IN BUSINESS AND INSTITUTIONAL ACTIVITIES, TRANSACTIONS, TRADING AND IN THE SHARING OF INFORMATION TO STAKEHOLDERS. THEREFORE, EMPLOYEES ARE ASKED TO BEHAVE IN A FAIR AND TRANSPARENT WAY.

FOR PEOPLE IN PROJECT

WORK WITH COMPETENCE AND PROFESSIONALISM TO BE CONSISTENT WITH THE COMPANY PHILOSOPHY IN ORDER TO BE RELIABLE AND LOYAL TO THE INTERNAL AND EXTERNAL STAKEHOLDERS WITH WHOM WE COOPERATE.

QUESTIONS AND REFLECTIONS TO PURSUE GUARANTEE, TRANSPARENCY AND FAIRNESS

- \cdot HOW DO I CONCRETELY APPLY THE COMPANY PHILOSOPHY IN MY WAY OF OPERATING IN THE COMPANY?
- · WHAT WORDS AND GESTURES DO I USE TO EXPRESS RELIABILITY TO STAKEHOLDERS?

SLOGAN

- · WE PUT OURSELF OUT THERE!
- · BE TRUSTWORTHY WITH WORDS AND GESTURES!



FOR PROJECT

PROJECT IN RELATIONS WITH THIRD PARTIES UNDERTAKES, IN FULL COMPLIANCE WITH NATIONAL AND INTERNATIONAL REGULATIONS, TO COUNTER INCIDENTS RELATED TO MONEY LAUNDERING FROM CRIMINAL ACTIVITIES OR THE RECEIPT OF GOODS OR OTHER ILLICIT UTILITY. THEREFORE PROJECT IS COMMITTED TO VERIFY THE RELIABILITY OF ITS BUSINESS PARTNERS, ACTING IN FULL COMPLIANCE WITH ANTI-MONEY LAUNDERING LEGISLATION.

FOR PEOPLE IN PROJECT

THE COMPANY MUST BE MADE UP OF PEOPLE OF MORAL AND PROFESSIONAL INTEGRITY IN ORDER TO BE ETHICAL AND CORRECT, AND NOT MAKE COMPROMISES FOR PROFIT TO SAFEGUARD THE COMPANY AS A GOOD OF ALL OF US.

QUESTIONS AND REFLECTIONS TO PURSUE PREVENTION OF CORRUPTION AND RECYCLING

- \cdot DO I ACT TO PREVENT SITUATIONS THAT COULD ENCOURAGE CORRUPTION?
- \cdot WHAT MAKES THE COMPANY FEEL LIKE A COMMON GOOD OF ALL OF US?

SLOGAN

- · NO PROJECT ... AHI AHI AHI
- · DO NOT COMPROMISE... BE HONEST!



PROJECT OBSERVES THE PRINCIPLE OF EQUALITY AND INCLUSIVITY WITHOUT DISTINCTION OF AGE, SEX, RACE, RELIGION, COLOR, DISABILITY AND PHYSICAL APPEARANCE, CITIZENSHIP, OPINION, MARITAL STATUS OR SEXUAL ORIENTATION, ECONOMIC AND SOCIAL CONDITION. COLLABORATORS ARE CALLED TO RESPECT THE DIGNITY AND RIGHTS OF INDIVIDUALS WITHOUT DISTINCTION.
FOR PEOPLE IN PROJECT

ACCEPTING DIVERSITY, HELPING IN EVERYDAY LIFE, WELCOMING WITHOUT PREJUDICE AND DISCRIMINATION TO SHARE THE COMPANY VALUES AND IN PARTICULAR THE VALUE OF THE "CIRCULAR COMPANY" WHERE EVERYONE AS A PERSON, DESPITE DIFFERENT ROLES, ARE ON THE SAME LEVEL.

QUESTIONS AND REFLECTIONS TO PURSUE EQUALITY AND INCLUSIVITY AM I OPEN TO ACCEPT IDEAS OF OTHER PEOPLE THAT MAY BE DIFFERENT FROM MINE?

· DO I WELCOME OTHER PEOPLE AS A WEALTH AND AN OPPORTUNITY FOR HUMAN AND PROFESSIONAL GROWTH?

- · BEING TOGETHER IS A BEGINNING, STAYING TOGETHER IS A PROGRESS, WORKING TOGETHER IS A SUCCESS!
- · ALL FOR ONE, ONE FOR ALL!



FOR PROJECT

PROJECT HAS AS ITS FUNDAMENTAL PRINCIPLE, THE RESPECT OF THE LAWS AND REGULATIONS IN FORCE AT REGIONAL, NATIONAL AND INTERNATIONAL LEVEL. THEREFORE, PROJECT WILL NOT INITIATE OR CONTINUE ANY RELATIONSHIP WITH THIRD PARTIES WHO DO NOT INTEND TO COMPLY WITH THE AFOREMENTIONED REGULATIONS AND LAWS IN FORCE.

FOR PEOPLE IN PROJECT

PAY ATTENTION TO COMPANY LAWS AND REGULATIONS IN ORDER TO PUT THEM IN PLACE TO BE RESPECTFUL TOWARDS PEOPLE IN THE COMPANY AND TOWARDS THE EXTERNAL STAKEHOLDERS WHO COLLABORATE WITH IT.

QUESTIONS AND REFLECTIONS TO PURSUE THE OBSERVANCE OF BEHAVIOURAL LAWS AND REGULATIONS

- · DO I RESPECT THE LAWS. OR DO I TEND TO PUT THEM ON THE BACK **BURNER?**
- DO I APPLY THE COMPANY REGULATIONS IN RESPECT OF MY COLLEAGUES?

SLOGAN

· IF YOU WANT RESPECT, SHOW RESPECT!



PROJECT ENSURES. IN IMPLEMENTATION OF THE PRINCIPLE OF COMPLIANCE WITH THE LAW, COMPLIANCE WITH INTERNAL, COMMUNITY AND INTERNATIONAL STANDARDS PLACED TO PROTECT INDUSTRIAL AND INTELLECTUAL PROPERTY. THE COLLABORATORS ARE CALLED TO PROMOTE THE CORRECT USE, FOR ANY PURPOSE AND IN ANY FORM, OF TRADEMARKS, DISTINCTIVE SIGNS AND OF ALL CREATIVE WORKS OF GENIUS, INCLUDING COMPUTER PROGRAMS, DATABASES, TO PROTECT THE COMPANY'S INDUSTRIAL AND INTELLECTUAL ASSETS. IT IS FORBIDDEN TO CARRY OUT ANY CONDUCT AIMED AT COUNTERFEITING, ALTERATION, DUPLICATION, REPRODUCTION OR DISSEMINATION, IN ANY FORM AND WITHOUT THE RIGHT OF THE WORK OF OTHERS.

FOR PEOPLE IN PROJECT

ENHANCE THE IDEAS, SKILLS, KNOWLEDGE AND PROFESSIONAL EXPERIENCES OF PEOPLE WHO BECOME VALUE TO SHARE AND PRESERVE IN THE COMPANY AND FROM WHICH TO GIVE SPACE AND SHAPE TO CONTINUOUS INNOVATION.

REFLECTIONS TO AND PURSUE INDUSTRIAL QUESTIONS AND INTELLECTUAL HERITAGE

- \cdot HOW DO I MAKE A CONCRETE CONTRIBUTION TO THE INNOVATION OF MY COMPANY?
- · HOW DO I MAKE MY PROFESSIONAL BACKGROUND AVAILABLE FOR COMPANY INNOVATION?

SLOGAN

- · PROJECT IS OFFICINA CREATIVA!
- · AHEAD WITH IDEAS .. SOURCE OF INNOVATION!

EALTÀ E FIDUCIA LOYALTY AND TRUST

FOR PROJECT

PROJECT ASKS THE COLLABORATORS TO ACT WITH LOYALTY AND GOOD FAITH, IN A TEAM SPIRIT BASED ON MUTUAL RESPECT AND COLLABORATION, AS WELL AS TO FULFILL THE CONTRACTUAL COLLABORATION, AS WELL AS TO FULFILL THE CONTRACTUAL OBLIGATIONS AND SERVICES REQUIRED, IN COMPLIANCE WITH THE RULES AND THE SHARED COMPANY GUIDELINES.

FOR PEOPLE IN PROJECT

IT IS IMPORTANT TO BE TRANSPARENT AND HONEST IN RESPECTING THE AGREEMENTS MADE WITH THE PEOPLE IN THE COMPANY AND WITH THE EXTERNAL STAKEHOLDERS WITH WHOM YOU COLLABORATE. ACT IN A WAY THAT CREATES AN INTERPERSONAL RELATIONSHIP BASED ON MUTUAL TRUST.

QUESTIONS AND REFLECTIONS TO PURSUE LOYALTY AND TRUST

- · DO I TRUST MY COLLEAGUES IN TEAMWORK? · HOW DO I ACT TO MAKE OTHERS TRUST ME?

SLOGAN

- · GIVE TO GET!
- · RESPECT AND YOU WILL BE RESPECTED!



PROJECT PROMOTES AND GUARANTEES THE HEALTH AND SAFETY OF ITS COLLABORATORS AT WORK. PROJECT IS ALSO COMMITTED TO ENSURING WORKING CONDITIONS THAT RESPECT INDIVIDUAL DIGNITY AND HEALTHY WORKING ENVIRONMENTS, ALSO THROUGH THE DISSEMINATION OF A CULTURE OF SAFETY AND RISK AWARENESS, PROMOTING RESPONSIBLE BEHAVIOUR IN COMPLIANCE WITH COMPANY PROCEDURES AND SAFETY REGULATIONS IN FORCE.

IN THIS PERSPECTIVE, EACH COLLABORATOR IS REQUIRED TO CONTRIBUTE PERSONALLY TO THE MAINTENANCE OF THE SAFETY OF THE ENVIRONMENT IN WHICH IT OPERATES AND TO MAINTAIN RESPONSIBLE BEHAVIOR TO PROTECT HIMSELF AND THE OTHERS.

FOR PEOPLE IN PROJECT

INSTRUCT COLLABORATORS TO LIVE THE WORKING SPACE IN COMPLIANCE WITH HEALTH AND SAFETY STANDARDS TO SAFEGUARD THEIR OWN WELL-BEING AND THAT OF THE OTHERS.

QUESTIONS AND REFLECTIONS TO PURSUE SAFETY AND HEALTH OF PEOPLE

- \cdot DO I KNOW THE HEALTH AND SAFETY RULES THAT I HAVE TO RESPECT IN THE COMPANY?
- · DO I ADOPT THE HEALTH AND SAFETY RULES TO SAFEGUARD MY OWN WELL-BEING AND THAT OF MY COLLEAGUES?

SLOGAN

- · LIVE CONSCIOUSLY, LIVE BETTER!
- · YOUR SAFETY AT THE SERVICE OF YOUR HEALTH!



RELATIONS WITH STAKEHOLDERS

RELATIONS WITH PROJECT STAKEHOLDERS

- THE RELATIONSHIP WITH OUR COLLABORATORS

FOR PROJECT

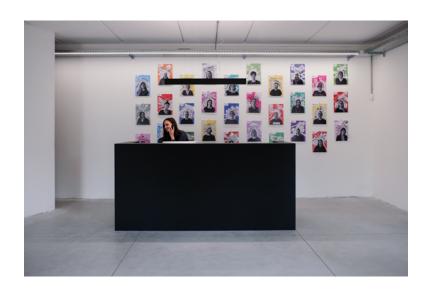
PROJECT PROMOTES THE VALUE OF PEOPLE AND IT RECOGNIZES THE HUMAN AND PROFESSIONAL CONTRIBUTION THAT IS DAILY SHARED FOR THE SUSTAINABILITY AND THE GROWTH OF THE COMPANY OVER TIME.

IN FACT, THE COMPANY PURSUES THE ENHANCEMENT OF PROFESSIONALISM, PROMOTES THE ASPIRATION OF INDIVIDUALS, THE EXPECTATION OF PROFESSIONAL AND PERSONAL GROWTH OF EACH, EQUAL OPPORTUNITIES WITHOUT DISCRIMINATION ON THE BASIS OF AGE, SEX, RACE, LANGUAGE, SEXUAL ORIENTATION, NATIONALITY, POLITICAL OPINIONS AND RELIGIOUS BELIEFS.

PROJECT GUARANTEES PHYSICAL AND MORAL INTEGRITY OF ITS WORKERS, RESPECTFUL WORKING CONDITIONS AND SAFE AND HEALTHY WORKING ENVIRONMENTS. THE EMPLOYEES ARE REQUIRED TO ENGAGE AND ACT LOYALLY, ENSURING THE PROFESSIONAL SERVICES AND THE COMMITMENTS UNDERTAKEN TOWARDS PROJECT.

FOR PEOPLE IN PROJECT

THE RELATIONSHIP BETWEEN PEOPLE IN THE COMPANY IS BASED ON HUMILITY, LISTENING AND RESPECT TO GIVE SPACE TO THE ENHANCEMENT AND EXPRESSION OF DIFFERENT SKILLS AND EXPERIENCES. PEOPLE IN THE COMPANY ARE ABLE TO COLLABORATE AND WORK WITH PROFESSIONALISM, TRANSPARENCY, LOYALTY, TRUST AND MUTUAL FAIRNESS TO ENSURE RELIABILITY IN THE CUSTOMER SERVICE.



- THE RELATIONSHIP WITH OUR CUSTOMERS

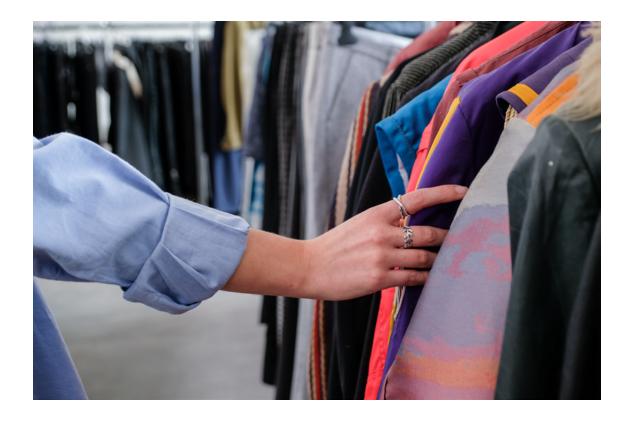
FOR PROJECT

PROJECT IS AWARE THAT EVERY CUSTOMER HAS DIFFERENT NEEDS AND THAT IT REPRESENTS AN OPPORTUNITY OF GROWTH AND IMPROVEMENT FOR THE COMPANY. THEREFORE, WE DEVELOP A RELATIONSHIP BASED ON THE PRINCIPLES OF INTEGRITY, HONESTY, FAIRNESS, TRANSPARENCY, RESPECT AND MUTUAL TRUST AS WELL AS PROFESSIONALISM.

PROJECT IS COMMITTED TO ENSURING THE QUALITY AND THE TRACEABILITY OF PRODUCTS THROUGH PROFESSIONALISM AND CLEAR, TRANSPARENT, CORRECT AND CONSTANT COMMUNICATION THROUGHOUT ALL PHASES OF THE COLLABORATION.

FOR PEOPLE IN PROJECT

THE RELATIONSHIP WITH CUSTOMERS IS BASED ON TRANSPARENCY, TRUST AND RESPECT IN CREATING A DIALOGUE BASED ON LISTENING TO REQUESTS AND THE PROFESSIONALISM OF CREATIVE AND INNOVATIVE PROPOSALS/ RESPONSES MADE BY PROJECT FOR THE CUSTOMER. CUSTOMERS CAN COLLABORATE WITH PROJECT THROUGH WARRANTY, FAIRNESS AND ACCURACY IN COMPLIANCE WITH THE AGREED SERVICE.



- THE RELATIONSHIP WITH OUR SUPPLY CHAIN PARTNERS

FOR PROJECT

PROJECT MANAGES RELATIONSHIPS WITH SUPPLY CHAIN PARTNERS WITH LOYALTY, CORRECTNESS, PROFESSIONALISM ENCOURAGING CONTINUOUS AND LONG-LASTING COLLABORATIONS IN ORDER TO FIND INNOVATIVE AND INCREASINGLY SUSTAINABLE SOLUTIONS THAT ALLOW TO FULLY MEET THE NEEDS OF THE CUSTOMER AND TO GRANT EQUAL OPPORTUNITIES FOR PARTNERSHIP TO EACH SUPPLIER.

THE SELECTION OF SUPPLY CHAIN PARTNERS AND THE DEFINITION OF COLLABORATION TAKE PLACE ON THE BASIS OF EVALUATIONS WITH PARAMETERS OF OBJECTIVITY AND IMPARTIALITY OF JUDGMENT THAT ARE BASED ON PROFESSIONALISM, QUALITY, SUSTAINABILITY AND INNOVATION, GUARANTEES PROVIDED, EFFICIENCY AND PRICE.

FOR PEOPLE IN PROJECT

THE RELATIONSHIP WITH THE SUPPLY CHAIN PARTNERS IS BASED ON RESPECT AND TRANSPARENCY TO CREATE PARTNERSHIPS THAT GIVE SPACE TO THE ENHANCEMENT OF THE DIFFERENT PROFESSIONALISM PRESENT IN THE SUPPLY CHAIN.

SUPPLY CHAIN PARTNERS ARE SUPPORTED IN THEIR PATH TOWARDS SUSTAINABILITY IN ORDER TO CONTRIBUTE IN A PROFESSIONAL AND TIMELY WAY TO AN ETHICAL AND TRANSPARENT SUPPLY CHAIN.



- THE RELATIONSHIP WITH COMPETITORS

FOR PROJECT

PROJECT, AWARE THAT A PROPER COMPETITION SYSTEM CONTRIBUTES TO CONTINUOUS IMPROVEMENT AND DEVELOPMENT, UNDERTAKES TO COMPLY WITH THE COMPETITION RULES IN FORCE AND REFRAINS FROM ENCOURAGING CONDUCT WHICH MAY LEAD TO UNFAIR COMPETITION.

THEREFORE, ANY DECEPTIVE CONDUCT, AGREEMENT OR UNDERSTANDING BETWEEN CURRENT OR POTENTIAL COMPETITORS THAT MAY INFRINGE THE COMPETITION RULES IN FORCE SHALL BE PROHIBITED IN RESPECT OF ALL ADDRESSEES.

FOR PEOPLE IN PROJECT

THE RELATIONSHIP WITH COMPETITORS IS BASED ON LOYALTY, FAIRNESS AND RESPECT IN A SPACE OF CONCRETE AND CONSTRUCTIVE COMPARISON TO GIVE VALUE TO THE SUPPLY CHAIN AND TO CREATE WEALTH FOR THE TERRITORY.

THE COMPARISON WITH COMPETITORS ALLOW TO DEEPEN KNOWLEDGE AND SKILLS AND TO CONTINUOUSLY INNOVATE IN ORDER TO ANTICIPATE THE TIMES AND COMPETE IN THE MARKET.



- THE RELATIONSHIP WITH PUBLIC INSTITUTIONS AND ADMINISTRATIONS

FOR PROJECT

PROJECT CONFORMS ITS CONDUCT TO THE PRINCIPLES OF TRANSPARENCY, HONESTY AND FAIRNESS IN THE MANAGEMENT OF RELATIONSHIPS WITH PUBLIC INSTITUTIONS AND ADMINISTRATIONS.

IN ADDITION, THE COMPANY PROHIBITS TO ACCEPT, OFFER, PROMISE OR SOLICIT EVEN INDIRECTLY, MONEY, GIFTS, GOODS OR SERVICES NOT DUE (ALSO IN TERMS OF EMPLOYMENT OPPORTUNITIES) IN RELATION TO RELATIONSHIPS WITH PUBLIC OFFICIALS AND/OR PUBLIC SERVICE AGENTS TO INFLUENCE THEIR DECISIONS IN ORDER TO OBTAIN MORE FAVORABLE TREATMENT, UNDUE BENEFITS, OR FOR ANY OTHER PURPOSE.

FOR PEOPLE IN PROJECT

THE RELATIONSHIP WITH PUBLIC INSTITUTIONS AND ADMINISTRATIONS IS BASED ON COLLABORATION IN COMPLIANCE WITH AND OBSERVANCE OF LAWS AND BUREAUCRATIC REGULATIONS IN FORCE FOR THE LOCAL AND NATIONAL TERRITORY.

WE ALSO WANT TO BUILD AN OPEN RELATIONSHIP AND PROPOSE INITIATIVES THAT CONTRIBUTE TO THE GOOD OF THE COMMUNITY WITH THE INSTITUTIONS AND THE PUBLIC ADMINISTRATIONS.



- THE RELATIONSHIP WITH THE LOCAL COMMUNITY

FOR PROJECT

PROJECT OFFICINA CREATIVA IS COMMITTED TO PROMOTING SOCIAL DEVELOPMENT, ECONOMIC AND EMPLOYMENT IN THE COMMUNITY WHERE THE HEADQUARTER IS LOCATED IN ORDER TO CREATE A CONTINUOUS DIALOGUE WITH CITIZENS, TO INFORM AND INVOLVE THEM IN SOCIAL AND ENVIRONMENTAL INITIATIVES.

FOR PEOPLE IN PROJECT

THE RELATIONSHIP WITH THE LOCAL COMMUNITY IS BASED ON THE COLLABORATION WITH THE LOCAL ADMINISTRATION, SCHOOLS, VOLUNTARY ASSOCIATIONS AND COMMERCIAL ACTIVITIES OF NEIGHBOURHOOD IN ORDER TO PROMOTE AND IMPLEMENT INITIATIVES THAT CREATE SOCIAL AND ECONOMIC WELL-BEING FOR THE LOCAL COMMUNITY.



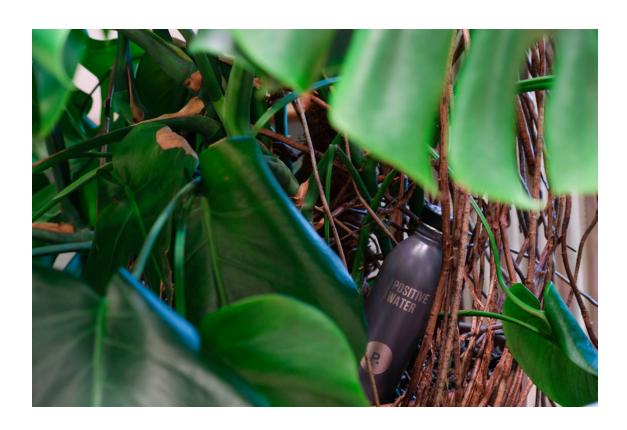
- THE RELATIONSHIP WITH THE ENVIRONMENT

FOR PROJECT

PROJECT IS AWARE OF THE IMPORTANCE OF THE ENVIRONMENT AS A COMMON RESOURCE TO SAFEGUARD FOR THE COMMUNITY AND THE FUTURE GENERATIONS WITH A VIEW TO SUSTAINABLE DEVELOPMENT. THEREFORE, PROJECT IS COMMITTED TO SPREADING A CULTURE OF RESPECT FOR THE ENVIRONMENT IN THE COMPANY BY PROMOTING RESPONSIBLE BEHAVIOUR ON THE PART OF ALL PEOPLE AND CONTINUOUSLY IMPROVING THEIR ENVIRONMENTAL PERFORMANCE WITH CONCRETE ACTIONS THAT AIM TO REDUCE THE IMPACT OF THE INTERNAL PRODUCTIVE ACTIVITIES, SERVICES, PRODUCTS, RAW MATERIAL WASTE AND LOGISTICS.

FOR PEOPLE IN PROJECT

THE RELATIONSHIP WITH THE ENVIRONMENT IS BASED ON THE RESPECT AND THE ATTENTION TO CONSUMPTION AND WASTE, NATURAL RESOURCES, RAW MATERIALS, PRODUCTION PROCESSES AND SUPPLY CHAIN, IN ORDER TO APPLY CONSCIOUS BEHAVIORS IN THE WAY OF OPERATING IN THE COMPANY AND THROUGHOUT THE SUPPLY CHAIN. TAKING CARE OF THE ENVIRONMENT MEANS THAT EVERY PERSON MUST COMMIT NOT TO WASTE AND TO RECYCLE, REPAIR, DIFFERENTIATE, REDUCE, RECOVER AND INNOVATE... THIS ALLOWS EVERYONE TO CONTRIBUTE TO THE RESPECT OF THE ENVIRONMENT AND, IN A BROADER VISION, TO THE SUSTAINABLE DEVELOPMENT.



COMPLIANCE WITH THE CODE OF ETHICS

THE CODE OF ETHICS AND ITS IMPROVEMENT

MONITORING

AFTER THE APPROVAL OF THE CODE OF ETHICS, PROJECT UNDERTAKES TO BRING TO THE ATTENTION OF INTERESTED PARTIES THE CODE OF ETHICS THROUGH APPROPRIATE COMMUNICATION ACTIVITIES AND PERIODIC TRAINING IN PARTICULAR FOR THE HUMAN RESOURCES OF THE COMPANY.

THE CODE OF ETHICS IS VISIBLE TO THE PUBLIC ON THE WEBSITE WWW.PROJECTOFFICINACREATIVA.IT

PROJECT HAS APPOINTED THE **WELFARE TEAM** TO OVERSEE THE IMPLEMENTATION AND THE COMPLIANCE OF THIS CODE OF ETHICS. EVERY SIX MONTHS A CONTACT PERSON WILL BE APPOINTED FROM THE TEAM TO COMMIT TO THE OBSERVANCE OF THE SAME WITH REFERENCE TO THE NEWS OF HAPPENED, ATTEMPTED OR REQUEST OF VIOLATION OF THE PRINCIPLES CONTAINED IN THE CODE OF ETHICS AND WILL HAVE THE TASK OF ENSURING THAT NO ONE, IN THE WORKPLACE, MAY SUFFER RETALIATION, UNLAWFUL CONDITIONING, INCONVENIENCE AND DISCRIMINATION OF ANY KIND, FOR HAVING REPORTED THE VIOLATION OF THE CONTENTS OF THE CODE OF ETHICS.

IN ADDITION, FOLLOWING THE REPORT, THE CONTACT PERSON WILL FOLLOW APPROPRIATE CHECKS AND SANCTIONS THAT WILL BE EVALUATED ACCORDING TO THE SEVERITY OF THE SITUATION DETECTED. EVERY 6 MONTHS, THE CONTACT PERSON MUST REPORT ALL INFORMATION AND FEEDBACK TO THE WELFARE TEAM.

PROJECT ASKS ALL THE STAKEHOLDERS TO COLLABORATE TO MAKE THE APPLICATION OF THE CODE OF ETHICS CONCRETE AND EFFECTIVE.

THEREFORE IT IS POSSIBLE TO SEND INDICATIONS AND IMPROVEMENTS USEFUL TO MAKE THE PRJT CODE OF ETHICS MORE VIABLE IN EVERYDAY LIFE AT THE EMAIL ADDRESS: ETHICSCODE@PRJT.COM.

