



CODE OF ETHICS

**ON THE ROAD TO
SUSTAINABLE HEADWEAR**



CODE OF ETHICS

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INTRODUCTION

Since 1995, with our brand Atlantis, we have specialized in the design and production of high quality hats. Since 2018, we have been integrating the major themes of Sustainability into our business strategy and product design. We are committed to managing our activities responsibly on a daily basis with the ambition to inspire our Stakeholders to in turn improve their impact on communities and the planet.

The Code of Ethics has been created thanks to the contribution of all the people of Master Italia and summarizes in a clear and shared way our values and principles built in more than 25 years of company history. Our expectation is that these principles, which guide our behavior as a company and determine our commitment to sustainable development, will be shared by all our Stakeholders, so that the work of all can be defined as transparent, ethical and sustainable.

PURPOSE OF THE CODE

The Code of Ethics (hereafter the "Code") is an integral and fundamental part of the governance system as it defines Master Italia's position and commitment towards its stakeholders and the value framework for those who operate in its sphere of action.

APPLICABILITY

The set of ethical principles, values and behavioural rules stated here must inspire the activity of all those who work, internally or externally, as part of Master Italia's sphere of action.

The Code defines the rules for employees and for direct and indirect business partners: manufacturers, suppliers, agencies, licensees and distributors.

Master Italia requires its employees and recommends its partners to respect the rules of this Code in accordance with the laws of the countries where it operates.

The respect of these rules is the basis of our corporate culture that allows our interlocutors to trust us.

OUR SUSTAINABILITY MANIFESTO

Since 1995 we have had a mission: to provide customers with high-quality headwear. We create hats for every type of business, mixing colours, shapes and finishings while featuring our all-Italian attention to style.

For us, the hat is not just an accessory, but an extension of an individual's personality which can be cherished with memories over time. Wearing our hats is also a way to send a message and tell a story. That is why we dedicate passion and care to the accurate manufacturing of our products.

Over the years, that devotion has transformed into something more - a commitment to increasingly responsible production that respects the planet and people.

Following a sentiment that was already coursing through our company and observing the effects of climate change, we realised that we had to question how we did things in order to do them differently. Among the first in the merchandising industry, we decided not to stand idly by but rather to give a signal toward change in production and communication.

Our journey began in 2018 - by introducing the first Oeko-Tex® Standard 100-certified models, more eco-friendly dyeing processes and traceability passports for our products - and continued with the design of an overall strategy anchored to the UN Sustainable Development Goals. This led to our introduction of new eco-friendly materials and the release of our first Sustainability Report.

Today, we continue to deepen and consolidate our strategy by working on three crucial pillars: product&supply chain, environment and people.

By 2025 we want to go bigger, making our collections 100% sustainable while investing in research and development to reduce our environmental impact, taking care of our employees and supporting local communities.

We are people who think about people and for us, being sustainable is not just a business occasion, but a daily behaviour. It is not just a responsibility. It's a revolution. It's the natural evolution that every company must go through.

Sustainable (r)evolution is on our minds. Wear it on your head!



CULTURE OF INTEGRITY

LIVING THE CODE

Principles

- » We evaluate the quality of our results by the way they are achieved. Therefore, we are committed to acting in every situation with transparency, accountability, fairness and integrity.
- » We relate to our employees with respect and loyalty.
- » We encourage a working environment based on collaboration and team spirit.
- » We build relationships with partners and customers based on trust.
- » We are committed to the creation of sustainable value over time. We do not pursue immediate results at the expense of long-term success.
- » We strive to work with customers and partners who share our values and way of doing business.

EACH OF US HAS AN INTEREST in abiding by the Code we have adopted and committing to its principles.

These principles guide our behaviors and inform how we interact with colleagues, the company of which we are a part, the marketplace and the communities with which we come into contact.

FOCUS

Before you take action, take the time to ask yourself a few questions

Is my behavior in line with... current law? Professional standards? Master Italia's values and guiding principles?

Does this decision make me feel comfortable?
Am I confident that I would not feel embarrassed to explain my decision if it became public, was reported in a newspaper or if I had to talk about it with my family and friends?

Would this decision hurt Master Italia or its reputation?

Am I treating others the same way I would want others to treat me?

If the answer to any of these questions is NOT "YES", stop and ask

WHAT TO DO:

The Code of Conduct may not cover every situation or answer every question that may arise in the course of performing work, but it is intended to provide a suggestion on the model of behavior to be adopted.

So, where do you turn when in doubt?

Contact sustainability@atlantisheadwear.com

MARKET

Promoting legal compliance

All «addressees» of this Code must comply with the applicable laws, rules and regulations of the contexts (national and international) in which they operate.

We recognize that «addressees» may not be fully aware of all applicable laws, rules and regulations, so it is important that they are able to determine when to seek assistance from appropriate personnel.

If you have questions regarding the interpretation of the law and its possible applicability in Master Italia, please contact your manager and/or the CSR Office.

Please remember that *compliance* is the responsibility of each individual employee.

Commitment to avoid any conflict of interest

A conflict of interest exists if an employee allows their personal interests, whether financial or non-financial, actual, perceived or potential, to influence their objectivity in performing their job.

A conflict of interest arises in any situation where there is a potential conflict between personal interests and obligations to Master Italia.

It is not acceptable to circumvent a potential conflict of interest by delegating others to do indirectly what you are prohibited from doing directly.

A conflict of interest, in itself, may not be a problem, but it becomes one if the person in a conflict of interest situation does not disclose it.

FOCUS

A conflict of interest may arise when:

- » you provide consulting services to a client and/or supplier without authorization;
- » you have financial/economic interests in any operation involving the sale of Master Italia's products/services or property;
- » you use Company assets, including equipment, materials or confidential information, for personal use or for external work activities unrelated to your job;
- » you accept sums of money, gifts, entertainment or benefits of more than symbolic value from competitors, suppliers or customers.

WHAT TO DO:

Communicate to your manager and/or to the President of Master Italia the situation of potential conflict of interest, or fill out the appropriate reporting form in anonymous form (see paragraph "reporting of violations").

Refusal to engage in corrupt or extortionate practices

Many countries, to support anti-corruption efforts, have enacted laws prohibiting such practices.

FOCUS

To name a few

The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, Legislative Decree No. 231/2001 in Italy, and the U.S. Foreign Corrupt Practices Act prohibit a company and its employees and third parties acting on its behalf from paying, or promising to pay, directly or indirectly, sums of money or other benefits to government officials/employees, political parties, officials/employees of political parties, or aspirants for political office, for the purpose of influencing decisions or official acts designed to benefit the company's business.

Other even more restrictive anti-corruption laws, such as the UK Bribery Act, prohibit making such payments to anyone, including non-government officials.

All Master Italia employees are required to comply with all applicable laws and the Company's anti-corruption policy.

Anti-corruption laws also prohibit us from asking or directing anyone to pay bribes or make improper payments on behalf of Master Italia. Accordingly, we may not knowingly allow third parties to do so on our behalf or ignore indications of such behavior from third parties.

WHAT TO DO:

Always be clear in relationships, both internal and external, that Master Italia does not tolerate corruption in any way and does not offer, match, request or accept (directly or indirectly) any payment or favor that may improperly influence business decisions.

Carry out controls to ensure the compliance of third parties that collaborate with Master Italia.

*A **bribe** is anything of value offered to influence a business decision or outcome, or to gain some other benefit of an improper nature. Examples include cash payments, offers of employment, excessive travel or entertainment, or favors to members of your household.*

Gifts and courtesies

No form of gift is allowed, towards representatives of the public administration or public officials or towards private subjects, which can reasonably be interpreted as exceeding the normal commercial practices or courtesy, or however aimed at acquiring favorable treatment in the conduct of any activity related to Master Italia.

WHAT TO DO:

Business courtesies, such as exchanging gifts or attending entertainment events, may be appropriate only in certain circumstances.

Guidelines

- » Gifts cannot be excessive.
- » Gifts should be infrequent.
- » A gift should not give the appearance of influencing a business decision.
- » Gifts of money (cash or cash equivalent) are never permitted.
- » Occasions for entertainment between Master Italia and others may be appropriate where participation helps build or maintain a professional relationship.

Master Italia respects and adheres to the policies of commercial partners that do not allow the acceptance of gifts or entertainment.

Fair competition practices

Recognizing the importance of a competitive marketplace, we are committed to full compliance with applicable competition and antitrust laws.

As part of fair competition, we do not knowingly infringe on the intellectual property rights of others, nor do we acquire or use confidential information.

WHAT TO DO:

Antitrust violations are often in the form of an “agreement between competitors,” whether such an agreement is in writing, verbal or merely implied.

Exercise caution when interacting with competitors, such as at trade shows, and if a competitor attempts to engage you in a conversation regarding matters that may involve unfair competition, stop immediately and report the incident to the Manager and/or President of Master Italia.

Working with or through third parties

We use third parties such as consultants, agents and distributors as part of our business activities. When working with third parties, care must be taken to mitigate the risks of doing so. Violations of law by third parties may pose legal risks to Master Italia.

It is also important to remember that individual Master Italia employees may also be liable for such violations.

WHAT TO DO:

Enter into agreements with third parties that require them to adhere to the same standards of ethical conduct that we adopt internally.

Carry out checks (due diligence) in order to ensure the compliance of such third parties, to this end they are required to provide timely and accurate information to Master Italia and to update any information that is not updated or accurate.



PEOPLE

We recognize the importance of respecting the individual, promoting human rights and dignity of people.

We support the protection of fundamental human rights in line with the UN Universal Declaration of Human Rights and the principal Conventions of the International Labor Organization (I.L.O.).

Aware of the central role of employees and collaborators in our success, we adopt procedures and methods of selection, training and professional development based on respect for human values, autonomy and responsibility and the importance of participation and involvement in achieving business results.

Respect and no discrimination

Zero tolerance for intimidation or harassment.

We consider any type of harassment or harassing behavior related to race, gender or other personal characteristics that has the purpose or effect of violating the dignity of the individual, whether inside or outside the workplace, to be absolutely unacceptable.

FOCUS

“**Harassment or importunity**” includes any unwelcome conduct, whether physical, verbal or sexual in nature, that has the purpose or effect of creating an intimidating, hostile or offensive workplace.

Avoiding harassing behavior involves refraining from the following conduct:

- » Offensive comments, slander or jokes that are based on a person’s race, color, religion, sexual orientation, age, degree of disability or other similar characteristics;
- » Unwelcome physical contact, aggression or intimidating gestures, (for example: blocking a person’s movement);
- » Any form of encouragement to perform acts of kindness through the influence exerted by one’s role;
- » The suggestion of private interpersonal relationships although it is expressly, or reasonably obvious, to refuse;
- » Retaliation against a colleague who has reported in good faith any instance of discrimination or harassment.

We expressly reject any form of discrimination or favoritism.

We are committed to providing equal opportunities to all our employees, both in employment and professional advancement, and to complying with all applicable anti-discrimination laws. We are committed to creating an inclusive environment that willingly accepts and values each other’s differences.

We value talent and skills, ensuring access to training and development paths aimed at improving professional skills and performance for all of our employees.

WHAT TO DO:

- » Ensure that the work of all employees is performed on the basis of freely agreed terms and conditions of employment.
- » Ensure that all employees are hired without having paid a “hiring fee”.
- » Ensure that all employees receive fair wages consistent with legally binding collective bargaining agreements.
- » Ensure that hiring and career advancement is based solely on merit.

Health and safety

Master Italia values the work and well-being of its employees, and is committed to promoting a safe and healthy working environment.

We consider health and safety in the workplace as a fundamental right of employees and a key element of sustainability.

Master Italia respects all applicable laws and regulations regarding health and safety in the workplace and believes in a culture of prevention and risk awareness among workers, actively promoting it through appropriate information and training. Each of us is responsible for proper safety management and must not expose ourselves or other colleagues to hazards that could result in injury or damage to ourselves or others.

Responsible use of company assets and resources

We trust our employees to behave responsibly and respectfully with respect to company assets and resources (ITC equipment, credit cards, facilities, equipment and communication systems, etc.). Taking care of company assets means preventing damage, loss, theft, destruction and unauthorized use.

Company assets must be used in a safe, ethical and legal manner. You may not use Company technology to download or send inappropriate, abusive, discriminatory, sexually explicit or offensive materials or statements.

Respecting the confidentiality of personal data

Master Italia respects the privacy and confidentiality of its employees' personal information. It acquires and retains personal data of employees, customers and partners solely for the purpose of conducting business operations or complying with regulatory requirements. No employee should seek to access the personal or confidential information of others except for legitimate business purposes.

Master Italia respects and protects confidential information confided by customers and third parties during business dealings, and applies appropriate measures to prevent such information from being accidentally disclosed.

COMMUNITY

Sustainability and responsibility

Sustainability is the framework within which to define strategies, policies and behaviors. We believe in a forward-looking development model that is careful to ensure a balance between economic initiatives and the essential requirements of environmental and social sustainability in accordance with national and international directives on the subject, contributing in our own way to the achievement of globally recognized sustainability goals.

Responsible sourcing

We are committed to operating in a manner that improves the lives of workers throughout our value chain, as well as communities and the surrounding environment. We expect our suppliers and business partners to share and adhere to the values and principles contained in the Code.

We intend to establish and maintain stable, transparent and cooperative business relationships with our suppliers.

Those who operate in the name and/or on behalf of Master Italia shall adhere to the entire contractual documentation submitted, which includes the obligation to comply with the Code and the rules of conduct defined in the document "Atlantis Headwear Code of Conduct", published and accessible at <https://atlantisheadwear.com/sustainability/>.

Transparent relationship with public institutions

Relations with officials of public institutions shall be limited to the appointed corporate functions and duly authorized in compliance with the strictest observance of the provisions of the law and shall in no way compromise Master Italia's integrity and reputation.

To this end, it is forbidden to offer, directly or through intermediaries, sums of money or other means of payment to public officials or persons in charge of a public service, in order to influence their activity in the performance of their duties.

We are an active part of the communities in which we work

Master Italia strives to contribute to the socio-economic development of the communities in which it operates through targeted initiatives, donations and gifts, sponsorships and, in general, activities compatible with the legislative framework in force.

REPORTING AND DISSEMINATION

Reporting violations

If you suspect a violation of the law, or of the rules set forth in the Code, or become aware of any other improper activity, you are required to promptly report the incident through the anonymous form <https://bit.ly/3OaHyIB> or through any of the other channels outlined earlier in the document.

Even in those situations where it may be difficult or complex to make a report, it is important to remember that if a violation is not reported and handled, harm may result to our reputation, the health and safety of our employees, and the interests of our customers or communities.

Reports may be submitted anonymously.

All employees who report suspected violations in good faith are protected from any form of retaliation against them.

Such reports will be thoroughly and professionally evaluated.

Any investigation that follows will be kept confidential to the extent possible.

Dissemination of the code

We ensure the knowledge and understanding of the Code and its values through a training program addressed to our employees.

Master Italia guarantees the timely diffusion of the Code of Ethics and Conduct to all employees and to all addressees of the Code.

The Code can be found and downloaded on the website <https://atlantisheadwear.com/sustainability/>.





first edition - June 2022

atlantisheadwear.com