

CODE of ETHICS

ENRICO MEIERHOFER SRL



**This document was approved by the CEO of ENRICO MEIERHOFER SRL
on 10 March 2020.**

Table of Contents

1. INTRODUCTION	3
2. PURPOSE, VALUE AND PRINCIPLES	5
3. SUSTAINABILITY COMMITMENTS	7
4. SYSTEM OF CONDUCT	7
5. IMPLEMENTATION AND APPLICATION	9



1. INTRODUCTION

The Code of Ethics or Code of Conduct sets out the general values of an ethical nature and the principles of conduct in business according to which our company constantly guide its activities, and spell our Purpose, Value, Principles and Commitment or PVPC.

Enrico Meierhofer srl was founded by Enrico Meierhofer Senior in 1924 and has now almost 100 years of history.

Our philosophy is oriented towards continuous research of high quality.

Our mission is to create and develop the best possible yarns.

Our commitment has been in creating the finest cotton yarns as well as technical yarns and side by side together with our customers deliver the highest quality in textile industry. Our ADN is Swiss, so our attention to quality and details, but at the same times we fully embrace Italian passion and creativity, this allowing us to bring forward a culture of quality and excellence for which our customers and fashion brands know us well.

Our vocation of understanding and implementing what expected from the market make us "Market oriented" and "Customer oriented". We propose ourselves to our Customers on a daily basis to build, together with them, their success with respect for tradition and sustainability.

We invest in raw materials because we strongly believe that cotton is the most precious natural fibers. For our customers we only select the best cotton and cotton blends.

Our strength and pride is that we only employ highly qualified and skilled workforces with great expertise and constant training for constant improvement of performance and quality.

The excellence of our yarns, the continuous innovation as well as the passion for our work represents our ambition in proposing ourself internationally as point of reference for high quality cotton yarns as well as technical textiles applications.

"Twisting Together the threads of your success"

The Code of Ethics is intended to outline the rights, duties, and responsibilities of our organization towards its "stakeholders" (including employees, suppliers, clients, the Public Administration, etc.) and expresses a set of rules of conduct that all those who work in the name and on behalf of the Company (employees, executives and non-executives, consultants, collaborators and so on) must comply with in the conduct of company business and activities.

The Code of Ethics provides the ethical and moral standards of the Company that are considered essential both in order to ensure the integrity and efficiency of relationships within the company (relations between management and employees) and to consolidate the positive reputation that the company has.

All those who, for any reason whatsoever, work, collaborate, or maintain professional relations with Enrico Meierhofer srl must, therefore, always and on every occasion, pursue the highest ethical standards in relations with colleagues, clients, suppliers, competitors, partners, Public Administrations and, in general, with the community, demonstrating honesty and integrity in every activity carried out.

Anyone who does not comply with the standards outlined in this document, regardless of the existence of specific sanctions under the law or according to the contract and the possible inclusion of facts of criminal relevance, is in breach of the principles that guide and characterize Enrico Meierhofer srl corporate policy and is therefore liable to disciplinary sanctions, in proportion to the seriousness of the conduct and as a result of a discussion on the matter.

Therefore, in accordance with a corporate policy attentive to the issues of legality, Enrico Meierhofer srl intends to clearly and unambiguously define the set of values that the company acknowledges and adopts as guiding principles for its operations, as well as the set of responsibilities that it assumes, both internally and externally.

Enrico Meierhofer srl is committed in promoting the knowledge of the Code among its recipients and in providing every possible means to ensure its full and effective application.

Recipients of the Code of Ethics

The ethical values and principles of conduct outlined in the Code are addressed to:

- Enrico Meierhofer srl team.
- ANYONE the Company has business relations with, whether commercial or not, each within the scope of his/her own functions and the position held ("External Parties"), including, but not limited to: collaborators, clients, and partners.

The Code of Ethics applies to all the activities carried out in the name of and on behalf of Enrico Meierhofer srl, both in Italy and abroad, while taking into account the cultural, social, and economic diversity of the various countries in which the Company operates. Observance of the principles set out in the Code is first and foremost a moral duty of the Recipients, who are required to be fully aware that it is instrumental to the pursuit of the company's objectives in accordance with the fundamental values outlined in the introduction.

2. PURPOSE, VALUE AND PRINCIPLES

The "General Principles" contained in this Code reflect the core values of Enrico Meierhofer srl and are the foundation for achieving the conduct we want to foster at all levels of the organization and with our stakeholders.

Compliance with the law

Enrico Meierhofer srl has, as an essential principle, compliance with applicable laws and regulations of an international, national, regional, provincial, and municipal nature in any area (administrative and fiscal, labor legislation, occupational safety and health, environmental, etc.), and, for this reason, it rejects all illegal practices by prosecuting any behavior contrary to legislation, the principles of this Code of Ethics or internal procedures.

Equality and impartiality

In decisions that affect relationships with its stakeholders, Enrico Meierhofer srl recognizes equal rights for all, without any discrimination of age, gender, sexuality, health, race, nationality, political opinions, or religious beliefs.

Enrico Meierhofer srl is committed to paying particular attention to disabled people, the elderly, and citizens belonging to the weakest social segments of society.

Enrico Meierhofer srl is committed to acting objectively, fairly, and impartially in compliance with the laws and regulations in force, as compliance with the laws and regulations in force is a fundamental principle.

Responsibility and honesty

When carrying out the company's mission, the conduct of all of the recipients of this Code of Ethics must be inspired by the ethics of responsibility.

When conducting any activity, situations must always be avoided where the persons involved in the transactions have, or may even only appear to have, a conflict of interest.

Continuity, diligence, and care in the execution

Enrico Meierhofer srl is committed to ensuring the continuity of strategic activity and direction and coordination for all company structures.

The recipients of the Code of Ethics must act with diligence, care, and professionalism to provide high quality services.

Transparency and completeness of information

All employees are requested to provide complete, transparent, understandable, and accurate information, so that, in establishing relations with the Company, stakeholders are able to take independent and informed decisions regarding the interests involved, alternatives, and significant consequences.

Community and environmental protection

Enrico Meierhofer srl is well aware of the influence, even of an indirect nature, that its activities may have on the conditions, economic and social development, and general welfare of the community, as well as the importance of social acceptance by the communities in which it operates.

For this reason Enrico Meierhofer srl, in carrying out its activities, is committed to safeguarding the surrounding environment and contributing to the sustainable development of the area: to this end it plans its activities by seeking a balance between economic initiatives and essential environmental needs, taking into account the rights of future generations.

Enrico Meierhofer srl conducts its activities and pursues its objectives in respect of the environment and in compliance with the relevant legislation in force, giving the latter a prominent role in any decision relating to the company's activities.

The company promotes respect for the environment by identifying it as a qualifying and rewarding element for each type of project.

To this end, the company follows with particular attention the evolution of national and European environmental legislation.

Confidentiality

The Company ensures the confidentiality of the information in its possession and refrains from searching for confidential data, except in the case of express and informed consent and in compliance with current regulations. Moreover, Enrico Meierhofer srl employees are prohibited from using confidential information for purposes unrelated to performing their activity.

Product quality

Enrico Meierhofer srl is committed, through the adoption of appropriate technological and organizational solutions, as well as through the constant training of human resources, to continuously improve the quality of its yarns. Our commitment is in creating the finest cotton yarns as well as technical yarns and side by side together with our customers deliver the highest quality in textile industry.

Integrity and protection of the individual

Enrico Meierhofer srl is committed to protecting the safety, health, moral and physical integrity of its employees, consultants, Clients, and Suppliers. To this end, it promotes responsible and safe behavior and adopts all the safety measures required by technological progress to ensure a safe and healthy working environment, in full compliance with current legislation on prevention and protection.

Enrico Meierhofer srl is committed to protecting the individual in all areas.

It works constantly to achieve a cooperative and non-hostile working environment and to prevent discriminatory behavior of any kind.

The recipients of the Code of Ethics are obliged to cooperate with the company to maintain a climate of mutual respect for the dignity, honor, and reputation of each individual.

Requests or threats aimed at inducing people to act against the law and the Code of Ethics, or to behave in a way that is detrimental to their moral and personal beliefs, are not tolerated and will therefore be adequately addressed.

3. SUSTAINABILITY COMMITMENTS

Enrico Meierhofer srl is well aware of market trends. Sustainability is now a days an important market trend and marketing tool to many companies...

Our company embrace Sustainability as development that meets the needs of the present without compromising the ability of future generations to meet their own needs, Enrico Meierhofer srl commit to real sustainability practices in all its activities and productions going beyond marketing label and fakes.

We commit in establishing policies and values oriented towards sustainability and pursuing sustainable supply chain objectives in all our activities.

We commit working hand in hand with our partners helping them progress with us in Sustainability. Also, we commit in maintaining a solid tracking system linked to the various stages of the production process.

OEKOTEX STANDARD 100 represent certification of environmental friendliness and product compliance with the strict regulations imposed by the brand OekoTex Standard 100 for our items in 100% long-staple cotton, our brands: "MENOUI EXTRA", "EXTRA LONG STAPLE", "POLLINO EXTRA", "ALFA KOMPAKT" and "DELTA KOMPAKT".

We work in strict adherence to the protocol MRSL ZDHC (Manufacturing Restricted Substances List)

We are among first signatory of the Cotton Pledge, responsible sourcing network against forced labor.

We joined BCI Certification – The Better Cotton Initiative (BCI) is the largest cotton sustainability program in the world aiming to develop more sustainable farming practices in order to better production practices for the people who produce it, for the environment and for the industry's future.

We do not hold direct or indirect relationship with entities related with Xinjiang Production & Construction Corps (XPCC) or banned from US Customs and Border Protection.

We escape from fakes claim, fakes organic and fake sustainable.

4. SYSTEM OF CONDUCT

Enrico Meierhofer srl has always encouraged and supported behavior aimed at spreading and implementing the fundamental values set out and shared above, which are to be applied to and required of all the Recipients.

Team

Team spirit, transparency, and mutual respect are considered the basis of relationships with all people. The company expects its staff to behave in an appropriate and transparent manner

and in line with the principles of this Code in the performance of their duties. The Company also expects professionalism, reliability, determination, commitment, a sense of responsibility, dynamism, and an attitude focused on continuous improvement in the performance of every activity. The Company is committed in offering equal opportunities in work and professional advancement to all its staff members in accordance with their skills and performance. Each staff member is therefore offered identical opportunities for work and/or professional growth without any discrimination. Public and private corruption practices, illegal favors, and collusive behavior are unacceptable and, therefore, prohibited. Enrico Meierhofer srl does not allow any form of favoritism, whether of a personal or family nature.

No form of irregular work is tolerated.

Personnel management

The management of working and cooperative relationships is aimed at developing each person's skills and competences, in accordance with an equal opportunities oriented policy of merit. Each employee has a duty to exchange and disseminate essential information within his/her work unit or project. Making knowledge available to those who need it leads to better results and greater efficiency and allows colleagues to develop full use of their skills more quickly. Enrico Meierhofer srl promotes team spirit and cooperation and expects employees at all levels to work together to maintain a climate of mutual respect.

Protection of health and safety in the workplace

Enrico Meierhofer srl is committed to fostering and consolidating a culture of health and safety in the workplace by developing risk awareness and promoting responsible behavior. It organizes training plans and carries out preventive actions and periodic checks in order to protect workers' health and safety.

Each staff member must adopt the preventive measures established by Enrico Meierhofer srl for the protection of his/her health and safety, which are communicated by means of specific guidelines, instructions, training, and information. Each staff member must not expose himself/herself or other workers to dangers that may cause injury or harm to themselves or others.

Confidentiality and privacy

Information of a confidential nature, data, and knowledge acquired, processed, and managed by employees in the performance of their work activities must remain strictly confidential and must not be acquired, used, communicated, or disclosed, either within or outside the company, except by authorized persons and in compliance with company procedures.

The utmost care and confidentiality is required to protect the information generated or acquired in order to avoid any improper or unauthorized use.

Clients

Enrico Meierhofer srl primary objective is the complete satisfaction of its Clients. Our mission is to create and develop the best possible yarns. Our commitment has been in creating the finest cotton yarns and side by side together with our customers deliver the highest quality in textile industry. The Company is committed to creativity and innovation while maintaining a high level of quality and service. For Enrico Meierhofer srl it is essential that the relationship with Clients be based on the principles of fairness, honesty, professionalism, and transparency. The Company

ensures appropriate methods of dialogue and listening, committing itself to always give feedback to suggestions and complaints, in order to strengthen the relationship in the long term.

Suppliers - Partners

Suppliers play a key role in achieving Enrico Meierhofer srl objectives. In relations with its Suppliers (partners), the Company promotes an honest, diligent, transparent, and cooperative conduct. Enrico Meierhofer srl is committed to raising awareness among its partners on the subjects covered by this Code of Ethics in order to promote awareness and compliance with the rules of conduct consistent with those expressed in this document, especially with regard to respect for human rights and workers' rights and sustainable and responsible management of environmental and social impacts. Enrico Meierhofer srl commits in growing with its partners and develop along with its long-lasting partners.

Contributions and sponsorships

Enrico Meierhofer srl developed long lasting relationship with Centro Aiuti per l'Etiopia a not for profit organization that is commitment in fighting hunger, diseases and poverty in Ethiopia since 1983, bringing forward long lasting humanitarian projects. Changing the world is possible if we do it together.

5. IMPLEMENTATION AND APPLICATION

Enrico Meierhofer srl is committed to widely disseminating this Code internally and externally through all corporate communication channels and to post it in places at the Company that are accessible to all staff. A copy of the Code of Ethics is given to each employee, partner and collaborator.

The Board is committed to ensuring compliance with the provisions of the Code of Ethics, carrying out supervision and monitoring activities on the implementation of the Code itself.

To this end, the Company:

- will ensure maximum dissemination and awareness of the Code of Ethics;
- will ensure the consistent interpretation and implementation of this Code;
- will carry out specific checks if violations of this Code are reported;
- will promote, in conjunction with the relevant company functions, the application of appropriate sanctions in the event that the above violations are confirmed.
- will ensure the prevention and suppression of any form of retaliation against those who contribute to implementing this Code;
- will periodically update this Code according to the needs that may arise from time to time, also in light of the abovementioned activities.

Reports should be submitted to the following e-mail address: info@meierhofer.it

Alternatively, reports can be sent to the following address: Enrico Meierhofer s.r.l. C.so Dante, 39/A – 28823 Ghiffa (VB) – Italy.