



CODE OF ETHICS

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PREMISE

Nova Fides began its operations in 1967 and has always stood out for the high quality of its products. This has been possible thanks to ongoing technological investments, particular attention to compliance with environmental regulations, and careful monitoring of the entire internal and external production cycle through partner companies in the Prato district.

The company oversees the entire production cycle, from the spinning of the raw material to the subsequent phases: throughout the various stages, product quality control is carried out by the company's technicians.

For production, Nova Fides also collaborates with qualified suppliers operating within the Italian textile districts, particularly that of Prato. Part of the weaving process is carried out by its subsidiary PAOLA TEXTILE SRL, whose factory is located across the street from the company.

With its Code of Ethics, Nova Fides seeks to highlight its corporate values: ethics, responsibility, and integrity are the foundation of its activities and managerial decisions, in the belief that corporate interests can be achieved through conduct consistent with the principles of Corporate Social Responsibility.

This must also find explicit application towards the innumerable corporate stakeholders such as people, suppliers, the environment, the State, customers and consumers, shareholders and the community.

Nova Fides finds its core value in its human capital, fostering a strong team spirit among its employees, directors, partners, and colleagues, building relationships of essential mutual loyalty, transparency, and collaboration. This also helps maintain our identity and the trust of our customers and partners.

For this reason, the values and ethical principles, the rules of conduct and the other contents of this Code of Ethics are shared with all recipients through appropriate tools and initiatives.

THE RECIPIENTS

The recipients of this Code of Ethics are employees, external collaborators (consultants, commercial partners, agents and, more generally, all those who have relationships with Nova Fides), suppliers, subcontractors, the Public Administration, the community and all other subjects who in various capacities and at various levels come into contact with Nova Fides or act in its name and on its behalf.

OUR ETHICAL PRINCIPLES AND VALUES

Over the course of its many years of operation, Nova Fides has built its identity by consistently choosing the principles of legality, ethics, and solidarity as its core values. It has established and maintained relationships with its stakeholders based on principles of fairness, transparency, loyalty, the highest professionalism, and mutual trust. Indeed, long-term business strategies are essential, ensuring the stability and longevity of the business through long-term, loyal relationships.

These guiding principles are reflected in every aspect of Nova Fides' work: the development of human resources, commitment to environmental issues and workplace safety, the protection of intellectual property, the fight against corruption, and the prevention of conflicts of interest.

The ethical principles that inspire Nova Fides' activities are:

- legality;
- equality and impartiality;
- transparency, fairness and reliability;
- professionalism;
- confidentiality;
- human resources development;
- health and safety;
- environmental protection;
- protection of competition.

RULES OF CONDUCT

The principles and values that characterize Nova Fides must be integrated into the daily conduct of directors, managers, and all employees in managing business and corporate activities, human

resources, communications, and information. In this context, Nova Fides has established specific rules of conduct in relation to:

- Conducting business and corporate activities
- Human Resources Management
- Environmental management
- Communication and information

CONDUCTING BUSINESS AND CORPORATE ACTIVITIES

Customer Relationship

Nova Fides is committed to building strong relationships of trust with its customers, respecting contractual agreements and focusing on customer satisfaction and protection, in a mutually collaborative effort to continuously improve the quality of its products and services. In this regard, relationships are based on the utmost fairness and transparency, providing complete, detailed, and truthful information, and ensuring the utmost confidentiality, flexibility, accuracy, and punctuality.

Relationship with suppliers and third parties

Suppliers and subcontractors, especially for a horizontal company like Nova Fides, play a vital role in production, and therefore their selection is crucial to improving the company's competitiveness.

The criteria adopted are not only economic convenience and price, but also carefully evaluated: the quality of goods and services, technical and organizational capacity, suitability to carry out the requested activities, compliance with regulations regarding health, safety, and the environment, human rights, workers' social rights, and financial stability.

Therefore, Nova Fides commits its Suppliers and Third Parties to respect the laws as well as to be aware of and adhere to the principles established by this Code of Ethics and the Supplier Code of Conduct.

In any case, in the event that the Supplier or Subcontractor, in carrying out their activities for Nova Fides, adopts behaviors that do not comply with the general principles of this Code of Ethics, Nova Fides is entitled to take appropriate measures to preclude any further opportunities for collaboration.

Relations with Public Bodies and Institutions

Nova Fides fulfills its obligations towards Public Institutions and Supervisory Authorities according to a logic of full collaboration, ensuring maximum transparency and clarity at all times and correctness, recognizing and respecting role and authority.

Relations with public bodies and institutions are managed solely by the designated functions and individuals, through transparent conduct and free from any behavior that could compromise their impartiality and independent judgment.

Relations with political and social organizations

Nova Fides contributes to the well-being and growth of the community in which it operates. To this end, it conducts its activities in a manner consistent with respect for local and national communities, fostering dialogue with local communities and the public institutions that represent them.

Nova Fides bases its relationships with representatives of political institutions on the strictest compliance with current legislation. It does not promote or maintain any relationship with organizations, associations, or movements that directly or indirectly pursue criminally unlawful or otherwise prohibited purposes. Nova Fides recognizes the value of social dialogue as a tool for ensuring a fair and participatory work environment. The company is committed to maintaining constructive and transparent relationships with union representatives and adopting collective bargaining practices where applicable. Regular meetings are also held to discuss issues related to employee well-being, safety, and professional development.

HUMAN RESOURCES MANAGEMENT

Human capital is a key asset for Nova Fides: the technical expertise, professionalism, and dedication of its employees are the essential driving force behind the company's growth. Therefore, developing and protecting its human resources is essential to its continued existence and growth.

Discrimination or harassment based on gender, sexual orientation, race, age, religious beliefs, disability, union membership, or political affiliation are not tolerated in the workplace.

Nova Fides reaffirms its commitment to combating all forms of discrimination and harassment, promoting an inclusive and respectful work environment. The company adopts preventative measures through awareness-raising courses and protected reporting procedures. The goal is to ensure that 100% of staff participate in training sessions on the topic by 2030, strengthening the corporate culture of respect and equal treatment.

Staff selection and establishment of the employment relationship

The assessment of personnel to be hired is based on the candidate's profile match with the company's expectations and needs, in compliance with the principles of impartiality and equal opportunities for all stakeholders. All personnel must be hired under a regular employment contract; any form of irregular or undeclared work is prohibited.

Upon beginning a collaboration, the employee/collaborator must receive comprehensive information regarding the characteristics of the duties and role, the regulatory and remuneration elements, and the regulations and behaviors for managing risks related to personal health.

Nova Fides is also committed to training and developing its workers through refresher courses that enhance their specific professional skills and maintain them over time.

Employees are required to comply with the provisions contained in the Employee Handbook.

Nova Fides invests in the professional development of its employees through ongoing training programs and technical and specialized refresher courses. The company promotes internal growth paths, aimed at ensuring career opportunities and enhancing talent. By 2030, Nova Fides intends to increase the hours of training provided per employee by 20%, with a focus on digital skills, sustainability, and safety.

Company assets and use of IT resources

Tangible assets, intellectual property, and other company resources may only be used for the purposes of carrying out company activities. Such use must be efficient, in a manner that does not alter their value, and must not conflict with Nova Fides' interests.

Conflict of interest

Nova Fides employees, collaborators, and directors are required to avoid any conflict of interest and, where this is not possible, to promptly disclose it to their corporate contacts. To this end, they are therefore required to refrain from promoting, facilitating, or engaging in any behavior, whether active or passive, that results or may result in an illegitimate or unlawful financial or other benefit for themselves or third parties, or that is intended to promote or favor illegitimate or unlawful interests, even to the detriment of Nova Fides.

ENVIRONMENTAL MANAGEMENT

The company guarantees safe and healthy working environments, in compliance with relevant laws and regulations.

This is further enhanced by a strong commitment to the environment, which has been reflected in an Environmental Policy, the preparation of a Sustainability Report, commitments to reducing energy and water consumption, controlling noise levels, and limiting the use of paper, fuel, and waste. Monitoring, measurement, and management of these aspects have also been implemented through specific certification programs.

COMMUNICATION AND INFORMATION

Corporate and accounting communications

The media and related corporate communications addressed to both the market and the Supervisory Authorities are managed exclusively by the officially designated entities in compliance with the principles of legality, transparency, accuracy, and timeliness.

Specifically, rigorous control criteria and principles of truthfulness, completeness, and accuracy are always applied in the preparation of Nova Fides' economic, asset, and financial documents, ensuring that the administrative and accounting system represents management facts reliably and accurately, in compliance with applicable laws and regulations.

Confidential information

In order to protect our reputation and preserve our business, it is essential that we properly handle confidential information.

This means information and documents relating to and/or owned by Nova Fides or its customers or business partners, relating to financial data, industrial programs, technical information, its employees or customers.

Employees who have access to this information must treat it as confidential and, therefore, are required not to disclose or use it outside of company operations unless in accordance with applicable legislation and with express authorization. Furthermore, when using social media, employees are required to use it responsibly, both at work and in their personal lives, to safeguard the company's reputation and image. Finally, personal data collected in the course of company operations is processed in compliance with applicable privacy laws and regulations.

IMPLEMENTING RULES OF THE CODE OF ETHICS

Suppliers, contractors, consultants, and representatives are required to observe the same standards of conduct as our company's employees when conducting business with or on our behalf. They are required to ensure that this Code of Ethics is also implemented by their employees, subcontractors,

and third parties with whom they work, in order to ensure ethics and transparency throughout the supply chain.

Procedures and Policies

The Board of Directors is personally committed to all corporate functions to ensure maximum collaboration and application of the principles established by the Code of Ethics by all staff.

Compliance with the provisions of the Code of Ethics and other policies approved by the company allows for the dissemination and promotion of a culture of quality at all levels of the company, which contributes to improved management efficiency and serves as a tool for supporting managerial action. Any failure to comply with the **procedures** and the Corporate Code of Ethics compromises the relationship of trust between Nova Fides and those who, in any capacity, interact with it.

Reports and Whistleblowing

Nova Fides is committed to operating ethically and requires and expects its employees, managers, consultants, collaborators, temporary workers, freelancers, third-party partners such as contractors, suppliers, customers, etc., as well as members of corporate bodies, to behave in accordance with:

- Code of Ethics;
- Corporate values;
- . Applicable laws and regulations.

To this end, it has structured whistleblowing rules to ensure a reliable and confidential channel for reporting potential non-compliance with ethical standards.

Information regarding actual or attempted conduct, risks, or irregularities detrimental to the Company's interests is considered relevant. The reporting party is responsible for providing all necessary information to allow the competent office to conduct the necessary and appropriate investigations and checks to verify the validity of the reported facts.

The company offers its employees and collaborators of any kind various reporting methods, which guarantee the confidentiality of the reporting party:

- by sending an email to the specifically activated email address - whistleblowing@novafides.com - whose transit is not tracked in the company information systems;
- using the boxes installed in common areas specifically labeled “reports”;

Environment and safety

Employees/collaborators, within the scope of their duties, participate in the process of risk prevention, environmental protection, and health and safety protection for themselves, their colleagues, and third parties.

In particular, Nova Fides, also through the active collaboration of its employees/collaborators, is committed to:

- promote and implement all reasonable initiatives aimed at minimizing risks and removing causes that may jeopardize the safety and health of people;
- pay continuous attention and commitment to improving its environmental performance, minimizing the negative impact on the environment and making conscious and responsible use of natural resources;
- collaborate with key stakeholders, both internal (e.g. employees) and external (e.g. institutions), to optimize the management of health, safety, and environmental issues;
- maintain high standards of safety and environmental protection through the implementation of appropriate management and monitoring systems.

Employees requiring personal protective equipment are required to wear and use it correctly, taking care of it as required by the relevant register.

Sanctions

Failure to comply with the ethical principles and rules of conduct contained in this Code of Ethics may result in disciplinary action, without prejudice to the possible adoption of different disciplinary measures related to other types of liability. Any violations of this Code of Ethics, depending on the seriousness of the circumstance, violation, or offense, will follow the procedure established by the applicable national collective bargaining agreement for the relevant sector.