

ANTICO È – CODE OF ETHICS

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INTRODUCTION

ANTICO È S.r.l. (hereinafter "ANTICO È") operates in the wood sector producing and selling floors and furnishing accessories; it has always been inspired by principles of ethical integrity and, coherently, has considered it appropriate to provide the Company with a Code (hereinafter referred to as "Code of Ethics") that collects these values and sets out the principles and rules of conduct to be followed and to whose observance are held social organs, management, employees, external collaborators and any person who cooperates in any way with it.

The ANTICO È Code of Ethics is therefore collecting the principles and general rules of behaviour that must be observed in order to ensure ANTICO È's good working, reliability and reputation.

ANTICO È is particularly mindful of promoting the application of the principles contained in the Code of Ethics to its business in the belief that business conduct is the basis of the success of the Company and represents the best expression of its image, element which constitutes a primary and essential value for it.

In drafting the Code of Ethics, ANTICO È has also taken into account the activities of prevention and contrast of the illicit to which every Italian company is held under the discipline provided for in Legislative Decree no. 8 June 2001 n. 231 et seq. mm.ii. with regard to the administrative legal responsibility of the entities and therefore the Code of Ethics constitutes a fundamental component of support of the "Organization, Management and Control Model" adopted by ANTICO È, according to the aforementioned discipline, for the prevention of illicit.

1. APPLICATION AND DESTINATION SCOPE

This Code of Ethics is directed to:

- Social organs and their components;
- The management;
- Employers;
- External collaborators;
- Consultants and collaborators of whatever title;
- Agents;
- Suppliers and partners;
- Any other person who can act in the name and on behalf of ANTICO È and, in general, to all those with whom ANTICO È comes in contact during their activity (hereinafter referred to as "Receivers").

ANTICO È considers an indispensable principle of its activity the respect of the laws and regulations applicable in all countries in which it operates, fairness and transparency in the conduct of business.

ANTICO È therefore promotes the creation of an environment characterized by a strong sense of ethical integrity, in the belief that this also contributes decisively to the effectiveness of policies and control systems. In particular, ANTICO È chiefs are required to follow the principles of the Code of Ethics in

setting the Company's goals, proposing investments and executing projects, and any management decision or action.

Likewise, those responsible for corporate functions, in giving concrete direction to the Company's management, should be inspired by the same principles, both internally, thereby strengthening cohesion and spirit of mutual collaboration, as well as with third parties, expressly prohibiting the use of illegal favours, collusive practices, corruption and / or solicitation of personal gains for themselves or others.

ANTICO È is committed to ensuring the widest possible dissemination of this Code of Ethics by providing every tool useful for awareness-raising of its contents, as well as constantly checking the degree of observance within the Company and finally update it in line with the organizational, commercial and financial developments of the Group.

At the time of the conclusion of contracts or agreements with third parties, the Company gives its interlocutors a Code of Ethics, informing them of the existence of the Model of Management and Control Organization and requesting compliance with the principles of the Code of Ethics and D.Lgs 231/01 et seq mm.ii.

In turn, the Receivers must actively contribute to the implementation of the Code of Ethics and report any problems or deficiencies to the ANTICO È Executive Board.

2. ETHICAL PRINCIPLES

ANTICO È considers that respect for the ethical principles set out in this Code of Ethics is an essential condition for achieving the primary objective of creating value for members, for those who work in the Company, for clients and the community as a whole. In this sense, the planning, operating, financial and operational strategies are oriented and inspired by the transparency and efficiency of resources use.

In order to achieve its objectives, ANTICO È complies with the following ethical principles (hereinafter also the "Principles"):

- Respect of the laws and regulations in force in all countries in which ANTICO È operates;
- Legitimacy, loyalty, fairness, transparency;
- Confidentiality;
- Respect for the value of the person and the human resources;
- Respect for competition as an indispensable tool for the development of the economic system and to create a market able to satisfy customer needs;
- Respect for health and safety at work;
- Respect for the environment and awareness of environmental protection.

2.1 APPLICATION OF ETHICAL PRINCIPLES: RECEIVERS' OBLIGATIONS

The chiefs and managers of ANTICO È are compelled to comply with this Code of Ethics and pursue their activity in values of loyalty, honesty and good faith, fairness, integrity. They are required to abstain from any activity that may be considered, even potentially, in conflict with the interests of ANTICO È, communicating with the ANTICO È Executive Board for the necessary assessments for the arise in the course of the social activity of a proper interest. In carrying out their duties, in their decision-making activities and in their actions, all the chiefs and managers must consider ANTICO È interests as being of priority to their personal or third party interests.

ANTICO È is committed to providing management, employees and collaborators with the resources they need to complete their work. Receivers are required not to use such resources for personal or noncompliance to ANTICO È's interests.

Everyone, in his professional field, must exclude individualistic behaviours and encourage the enhancement of teamwork and mutual contributions.

Employees and collaborators are working to achieve social purpose with professional rigor, loyalty, honesty and good faith, fairness, commitment and spirit of mutual collaboration. Collaboration, loyalty and mutual respect must be based on relationships between employees at all levels, and between them and third parties, with whom they are in contact on the basis of their work.

Every action, transaction, negotiation, and more generally any work done by employees and collaborators must comply with the rules of transparency, completeness and truthfulness of information as well as the Company procedures.

In particular, employees and collaborators are required to:

- Know and respect internal procedures regarding permits, holidays, and expenses reimbursements, having regard to the latter in providing adequate documentation;
- Know and to pass on any business information regarding the security and use of information regarding ANTICO È and its competitors;
- Use diligently and solely for purposes related to carrying out assigned tasks, business assets;
- Use computer systems with precision with the absolute prohibition of manipulation of the data contained therein;
- Do not use the name and reputation of ANTICO È for personal purposes;
- Diligently observe the provisions of this Code of Ethics, refraining from any behaviour contrary to them;
- Offer the utmost collaboration in detecting possible and / or suspected violations of this Code of Ethics;
- Inform third parties who come into contact with the Company about the requirements of the Code of Ethics and require compliance.

2.2 THE VALUE OF HUMAN PERSON AND HUMAN RESOURCES

ANTICO È promotes the value of the person by respecting physical, cultural and moral integrity, protecting his employees and collaborators from discrimination on grounds of nationality, race, ethnicity, religious belief, political and trade union membership, language, age, sex and sexuality. In this sense, the Receivers must actively collaborate to maintain a climate of mutual respect for each other's dignity and skills.

ANTICO È considers his employees and collaborators as a precious and indispensable resource for his own existence and future development. It considers it essential to ensure uniformity and homogeneity of management in all societies and countries in which it is present, respecting local cultures and legislation.

ANTICO È pursues the excellence and valorisation of the spirit of innovation, respecting the limits of the responsibilities of each and at the same time promotes the participation of people in their growth project. Management and employees are encouraged to take responsibility and work to overcome challenges and achieve business goals. ANTICO È's entrepreneurial culture recognizes, promotes and rewards individual productivity and teamwork.

In order to enhance the skills and competences of its employees and collaborators, ANTICO È adopts merit criteria and guarantees equal opportunities for all, without discrimination, so that:

- Selection and evaluation of staff is carried out on the basis of objective criteria based on the correspondence of professional profiles and candidates' competences with respect to business needs and respect for equal opportunities for candidates;
- The information taken during the selective process is closely linked to the verification of the professional profile sought, respecting the candidate's private sphere and his / her personal opinions;
- The staff is recruited in accordance with the contractual terms provided by the legislation in force in the countries in which ANTICO È operates and the national collective labour contracts applicable;
- Assignment of tasks is defined in consideration of the skills and capabilities of individuals based on the needs of ANTICO È and on the professional growth of their employees;
- Management, training and development policies are aimed at supporting employees in their career growth path and constantly upgrading their managerial and technical skills to each and every one to best perform their role and achieve their business goals;
- The remuneration system is defined on the basis of the role of employees and collaborators and the skills and competences it requires, as well as the results achieved and the continuous and systematic comparison with the external market of reference;
- Collection of information and production of documents in selection and management, as well as their storage on paper or computer, comes in accordance with the laws in force in different countries.

ANTICO È guarantees working conditions respectful of the dignity of the person and in this sense censors the injurious and discriminatory behaviours of the person also on beliefs and preferences and expressly denounces any form of psychological, physical and sexual harassment.

ANTICO È is committed to rooting a safety and healthy culture of the workers within the workplace, promoting awareness of the risks and the responsibility of individual behaviours with a view to continuous improvement.

ANTICO È acts towards its employees and collaborators in full compliance with the provisions of Italian law on health and safety at work as per D.lgs. April 9, 2008 n. 81, and its subsequent amendments and additions, or the local regulations in force in the various countries.

2.3 CONFIDENTIALITY

ANTICO È is in compliance with D.lgs. 196/2003 et seq mm.e ii. "Personal Data Protection Code" and individual local laws for foreign companies protect the personal data processed in the course of their business in order to avoid its misuse or even illicit and accordingly adopts specific procedures aimed at:

- Adequate information to the interested parties;
- Acquiring the consent of the interested parties where necessary.

ANTICO È is constantly applying and updating policies and specific information protection procedures. Each Receiver must also standardize their behaviour to the utmost confidentiality even outside working hours in order to safeguard the technical, financial, legal, administrative, personnel and business know-how of the company. Each Receiver is also required to work with third parties in the best respect of the privacy principle and the necessary requirements to protect the privacy of the persons concerned.

In addition, all those who, as a result of completing their duties, have the material availability of confidential and relevant information, are required to avoid any misuse or illicit of information. This obligation will remain in force even after the conclusion, for whatever reason, of the employment relationship.

In particular, each Receiver is required to:

- Deal exclusively with the data and information necessary for the purposes of the area where it performs its activity;
- Communicate data and information in accordance with current business procedures;
- Keep data and information in such a way as to make it inaccessible to unauthorized persons.

2.4 CORRECTNESS AND TRANSPARENCY OF CONTABILITY AND INTERNAL CONTROL

ANTICO È, in accounting, acts in strict compliance with the applicable regulations, even regulatory, relating to the preparation of financial statements and, more generally, mandatory administrative and accounting documentation.

Accounting records of management facts, information and company data provided to third parties are carried out in accordance with transparency, fairness, accuracy and completeness.

Every action, operation or transaction must be properly recorded in the company's accounting system in accordance with the criteria laid down by applicable law and accounting principles and, moreover, duly authorized, verifiable, legitimate, consistent and fair in accordance with internal procedures.

Receivers are required to work closely to ensure that management facts are correctly and timely reported into the Company's accounting records and to retain all supporting documentation so that it can be easily accessed and consulted by the supervised entities.

ANTICO È demands and promotes full respect for internal control processes as a tool for improving business efficiency.

The internal control system consists of controlling that individual business functions perform on their own processes in order to protect corporate assets, effectively manage corporate activities and provide clear information on the Company's balance sheet, economic and financial position as well as on activities aimed at identifying and containing business risks.

The Receivers are required, as far as they are concerned, to actively cooperate in the proper and effective functioning of the internal controls system.

Corporate functions are guaranteed free access to data, documentation, and any information useful for carrying out the control activity.

2.5 ENVIRONMENTAL RESPONSIBILITY

ANTICO È actively promotes environmental protection through rational use of energy and raw materials, minimizing the harmful impact of its activity and treating as far as possible separate collection.

ANTICO È is also committed to raising awareness of its employees and collaborators on these issues.

3. RELATIONS WITH THIRD PARTIES

ANTICO È is particularly careful in develop a mutual trust relationship with all its possible interlocutors.

In the conduct of its activities ANTICO È complies with the principles of loyalty and fairness, requiring all those who act on its behalf honest, transparent and compliant behaviours, not tolerating corrupt conduct and / or collusive behaviour or unfavourable favouritism.

It is forbidden to employees and collaborators, in the conduct of any affiliated activity in ANTICO È, to give / offer and / or accept / receive gifts, benefits and / or any other usefulness, personal and not, except for gifts of modest value attributable to normal courtesy or commercial practices.

3.1 RELATIONS WITH CUSTOMERS

The relationship with the customer should, as far as possible and in compliance with the business procedures, be the greatest customer satisfaction.

Customer needs to be given comprehensive and accurate information on the products they provide so that they can make informed choices.

ANTICO È guarantees the right quality standards of the products offered and is committed to periodically monitoring the quality of the product.

Information received from customers will be retained by ANTICO È in accordance with the principles set forth in the above section "Confidentiality".

3.2 RELATIONSHIPS WITH SUPPLIERS AND EXTERNAL CONSULTANTS

The choice of suppliers and external consultants is carried out according to criteria of competence, professionalism, economics, fairness and transparency.

When choosing suppliers and external consultants, as well as determining the terms of purchase of goods and services, or assigning professional assignments, Receivers should try to get the most competitive advantage for ANTICO È by selecting the supplier or consultant that is able to provide quality goods and services to the most appropriate terms and conditions.

Suppliers and external consultants, at the time of signing the contract, are provided with a copy of this Code of Ethics, requesting to standardize their conduct with the principles set forth therein.

Any breach of the aforementioned principles, measures and procedures constitutes, if it is established, a contractual and legitimate breach of contract to the Company to settle the contract, without prejudice to damages. The conclusion of a contract with a supplier must always be based on reports of extreme clarity, avoiding, where possible, the assumption of contractual constraints that involve forms of dependency for the contractor or ANTICO È.

Reimbursement and any sums paid to suppliers and consultants for professional supplies and assignments must be in line with market conditions and properly documented.

3.3 RELATIONSHIPS WITH THE PUBLIC ADMINISTRATION

Relationships with public administration are exclusively: those that are instrumental in obtaining authorizations that are necessary for the conduct of business activities to assess the implications of laws and regulations regarding business activities needed in response to requests made to ANTICO È by the public administration in carrying out its institutional activity.

Relationships with public administration must always be clear, transparent and correct, and not be susceptible to ambiguous or misleading interpretations.

In particular, Receivers should not seek to improperly influence public administration decisions by offering money or other usefulness, such as job opportunities or business opportunities that can benefit public officials or public service agents as well as their family members.

ANTICO È cannot provide direct or indirect contributions of any kind, nor allocate funds in support of public entities belonging to the public administration, except as permitted and provided by the laws and regulations in force and provided that: they are regularly approved by the competent corporate functions regularly documented from an accounting and management point of view, they do not place any of the Receivers in a position of conflict of interest.

3.4 RELATIONS WITH JUDICIAL AUTHORITY AND OTHER INSTITUTIONAL AUTHORITIES

The management of relations with the Judicial Authority and other institutional authorities is reserved exclusively to the corporate functions assigned to it.

The Receivers are required to provide the maximum availability and collaboration with the Judicial Authority and / or other institutional authorities during any inspection or inspection they may have.

Receivers who, for work-related purposes, will be subject, either personally, to inquiries and inspections, or receive subpoenas, and / or those to whom other judicial measures will be notified will have to inform the Directorate of ANTICO È.

3.5 RELATIONS WITH POLICY AND LEGAL ORGANIZATIONS

ANTICO È contributes to the economic well-being and growth of the community in which it operates. To this end it unifies, in carrying out its activities, respecting local and national realities, promoting dialogue with trade unions or other organizations.

ANTICO È marks its relationships with political parties or their representatives or candidates, to the strictest respect of current legislation.

It is forbidden for the Receivers to promote or distribute payments or goods of any kind, in the name and / or on behalf of ANTICO È, in favour of politicians and trade unions or representatives of the same, except as permitted and provided by the laws and regulations in force.

3.6 RELATIONS WITH OTHER INTERLOCUTORS

ANTICO È relationships with private entities, such as ONLUS and other non-profit organizations, must be based on the strictest observance of applicable law provisions and can in no way compromise the integrity and reputation of ANTICO È.

The assumption of commitments and the management of relationships, of any kind, with private entities, are reserved exclusively to corporate departments and to authorized personnel, according to the system of delegations and business procedures.

3.6.1 SPONSORSHIPS

ANTICO È can join sponsorship requests for events that offer quality assurance and seriousness.

Sponsorships can cover social, environmental, sports, entertainment and arts and culture issues.

3.7 RELATIONSHIPS WITH PARTNERS AND OPERATIONS WITH RELATED PARTIES

ANTICO È is working to ensure that all members are treated equally. The benefits of belonging to a group are pursued, in addition to applicable law, of the interest of each company in profitability and value creation for partners (or shareholders).

Transactions with related parties, including intergroup transactions, comply with substantive and procedural fairness criteria, according to certain behavioural rules.

4. EXTERNAL COMMUNICATIONS

Any external communication of ANTICO È documents and information or other subjects with which ANTICO È is related must be in accordance with applicable laws, regulations and practices.

In any case, it is forbidden:

- The disclosure of any confidential information acquired in carrying out business activities;

- the dissemination of false or tendentious news concerning ANTICO È or other subjects with which ANTICO È is related in the performance of his activities;
- Any form of pressure to acquire favourable attitudes by the media / information providers.

In order to ensure the completeness and consistency of the information, ANTICO È's relations with the public information bodies are reserved for the relevant functions.

5. DEFENCE OF THE COMPANY ITEMS AND INFORMATION SYSTEMS

Collaborators and employees are required to work diligently to protect ANTICO È's business assets. In particular, each of them must:

- Use scrupulously and with parsimony the goods to it given;
- Avoid improper and / or personal use of business assets that may cause damage or otherwise conflict with the interests of ANTICO È.

Collaborators and employees are also required to use the Company's IT systems accurately so as not to compromise their functionality and protection and to avoid any kind of manipulation of the data contained therein.

The disclosure of confidential information or the unauthorized disclosure of information from the web is prohibited.

6. DRUGS AND ALCOHOL

ANTICO È forecasts, as an indispensable requirement, a non-drug and alcohol-free working environment for all directors, divisions, employees, and collaborators who operate in or outside the Company's premises. If they are exposed to work under the influence of narcotics or alcohol, they will be subject to disciplinary measures, applied gradually until the termination of the employment relationship in the most serious cases.

Management, employees, and collaborators who have work-related problems or are involved in significant accidents or incidents will be liable to layoffs if medical examinations show the presence of drugs in their body.

Management, employees and collaborators who, while serving or at a company headquarters, distribute, sell, buy, splurge, possess or use illegal substances are also liable to lay off.

7. VIOLATIONS AND CONSEQUENTIAL CONSEQUENCES

In order to safeguard the integrity of ANTICO È, all Receivers, if they become aware of alleged violations of this Code of Ethics or of behaviours that do not comply with the rules of conduct adopted by ANTICO È, must inform immediately ANTICO È's Executive Board. The ANTICO È Directorate will proceed to verifying the validity of alleged breaches by hearing the person who made the report and / or the alleged author, if applicable.

They must also be mandated to the ANTICO È's Directorate informations of official acts resulting from non-compliance with the rules and regulations (e.g. measures by judicial police bodies, legal assistance requests from executives and / or employees in case of legal proceedings, etc.).

Provisions considered appropriate, irrespective of the possible exercise of criminal prosecution by the judicial authority, will be taken against the perpetrators of the criminal offense by informing the competent business units of the sanctioned measures imposed.

Compliance with the provisions of this Code of Ethics must be an essential part of the contractual obligations of employees. Any violation of the provisions of the Code of Ethics constitutes a breach of the obligations of the employment relationship and / or disciplinary offense, in accordance with the applicable local legislation and in particular for Italian companies in accordance with the procedures laid down in the Staff Regulations and applicable collective bargaining, with all legal consequences, even with regard to the retention of the employment relationship, and may result in compensation for damages arising from the same.

The observance of the Principles of this Code of Ethics is part of the contractual obligations assumed by employees, consultants and other parties in business relations with ANTICO È. Any breach of the provisions contained therein may constitute a breach of the contractual obligations assumed, with any consequence of law regarding termination of the contract or assignment, and damages for damages.

ANTICO È is committed to entering into contracts with suppliers, collaborators and external consultants, resolutions expressed with reference to the assumptions of violation of the Code of Ethics.

8. APPROVAL OF THE ETHICAL CODE AND RELATED AMENDMENTS

This Code of Ethics has been adopted by resolution of the Executive Board of ANTICO È on 1st September 2017 with immediate effect and use to all recipients by electronic mail, direct communication, posting in bulletin boards, delivery, etc.

The Code of Ethics does not replace current and future business procedures that continue to be effective, to the extent that they are not in conflict with the Code of Ethics.