



CODE OF CONDUCT FOR COMMERCIAL PARTNERS

COIN (hereinafter also referred to as the “Company”) manages a multi-brand store operating in the luxury sector. Basic part of its business is the commitment to carry out the agreements with its suppliers, partners and third parties (hereinafter, jointly the “Partners”) in an ethical, responsive and sustainable way.

It is essential that the Partners which represent the Company within the retail spaces share the values of a sustainable vision of the business.

COIN has designed a code of conduct for Partners and asks them to abide by such code as a shared commitment.

The code of conduct refers to the commercial management activities relating to the purchase of products from suppliers, resellers, distributors or to the management of a department or to a commission agreement with a partner and to the events organized within the store.

This document is subdivided into the following sections:

- General requirements
- Protection of human rights in workplaces
- Responsibility in the supply chain
- Protection of the environment
- Sustainable products development
- Application and compliance with the code

COIN asks its Partners to read, understand and accept the following principles by executing this document.

GENERAL REQUIREMENTS

The compliance of behaviour with the law is a mandatory requirement for all recipients of this Code of Conduct. Everyone involved should be aware of the legal consequences relating to their business. The management of the companies must be based on principles of cooperation, responsibility, professionalism and diligence.

The Partners’ behaviour should conform to the essential principles contained in this Code of Conduct with honesty, professionalism and transparency, by prohibiting the behaviours which conflict not only with the law provisions and but also with the values that the Company aims at enhancing.

COIN asks its Partners to abide by the laws, rules and regulations concerning their business and those of their partners in the Countries where they work. The Partners





should assure that the production, or other activity subject to the issuance of specific authorisations by the competent authorities, is carried out only after such authorisations are released.

We ask the Partners to comply with high ethical standards and to assure their integrity in conducting business.

The Partners shall avoid any corruption practice, including extortion, fraud and kickbacks. The Company forbids corruption in all the commercial practices. Any employees who report a problem or refuse a corruption activity must be protected from any negative consequences. Acceptance of payments, gifts or other advantages that may impact the outcome of commercial decisions must be prohibited.

COIN does not accept money laundry or the financing of terrorism.

The international standards and processes applicable to the accounting and bank operations must be abided by.

COIN requires compliance with the competition laws. The Partners shall not try to take advantage of belonging to trade association to obtain or exchange information, in breach of laws and competition rules.

The Partners must comply with all the laws and regulations concerning product safety. They must take all the necessary steps to ensure that their products meet all the safety requirements provided by the law. Such measures protect the Company's and the Partners' reputation and reduce the risk of legal liability.

In case of any request by the authorities, the Partners must transmit the material features and the information on health and safety of the Products that they supply to the Company, pursuant to the concerned trade laws, including information on the Country of origin.

COIN asks that health and safety are ensured to the workers employed on manufacturing.

The Partners must use proper measures for internal complaints and denunciations on irregularities to let employees report any offence without fear of reprisals.

RESPECT OF HUMAN RIGHTS IN WORK PRACTICE

COIN requires Partner to abide by the United Nations Universal Declaration on Human Rights and the eight fundamental conventions of the International Labour Organization and, more in general, to behave respecting all human rights, including labour rights.

The fundamental personal human rights and dignity must be respected.





In case of productions in Countries where local communities are present, their rights must be respected as well as the value of their traditional, cultural and social heritage.

Any discrimination based on race, ethnic group, social class, national origin, religion, disability, sex, sexual orientation, trade union, politics affiliation, marital status, aspect, age or other must be banned.

COIN does not tolerate any form of discrimination in workplaces. It respects the employees' religious and cultural freedom. The use of corporal punishment and the use of humiliating treatments, harassment, abuses, coercion or intimidation in any form are not allowed.

COIN forbids the use of forced, tied work or the use of prisoners. The work must be performed within lawful working relationships. The Company forbids the collection of personal documents by the employer and does not accept that the hiring is subject to any kind of caution money or tax.

COIN refuses the use of child labour, i.e. the performance of any work which may put at risk or interfere with the children education, their health and physical, mental, spiritual, moral or social growth and requires the Partners to ascertain that in the production sites the suppliers commit themselves to hire workers in compliance with the law in force in the Country.

In Countries where the law allows the child labour, this must be carried out in a way that do not interfere with the children education and do not compromise their health and physical, mental, spiritual, moral or social growth.

COIN requires that the employees are paid in compliance with the standards and the laws in force on the minimum wage.

COIN requires that the labour time complies with the International Labour Organization conventions, as well as with the national laws. The maximum limit of paid work shall not exceed 48 hours a week, and the amount of overtime work shall not exceed the time fixed by the collective contracts or the laws in force. The weekly rest and the annual holidays must be assured. All the law provisions on maternity and paternity leave as well as leave on serious familiar grounds must be abided by.

Workers shall be allowed to associate freely. The collective labour agreements must be respected, and the representation of workers must be given the possibility of discussion and effective dialogue with management.

Working conditions must be safe and healthy for all employees and compliant with applicable laws and regulations. The Partners must take appropriate measures to prevent accidents, injuries and health problems related to the performance of work activities.





Employees must be made aware of health and safety risks specific to individual roles, and of the actions to be taken in the event of an accident. Workplaces must be equipped with proper sanitation, and access to safe drinking water. Fire control must be in working order, with emergency exits and escape routes appropriately indicated. Workers shall be allowed to report and discuss on health and safety matters with management.

Emergency plans should be established on the basis of reasonably foreseeable risk assessment, and accessible evacuation plans should be made available and displayed to all the staff.

Hazardous substances must be stored in appropriate places, protected by appropriate means to prevent risk of contact and intoxication for employees.

COIN requires that all workers are provided with personal protective equipment in relation to their duties and the resulting risk.

In the event of an accident, access to appropriate medical facilities should be given and the staff must be adequately trained to provide first aid.

RESPONSIBILITY IN THE SUPPLY CHAIN

COIN calls for compliance with international and local laws. It requires abidance in the Convention on international trade in endangered species from extinction (CITES) as regards procurement, import, use and export of raw materials from endangered or protected species.

COIN asks that partners adhere to ethical practices on animal welfare, in accordance with the principles of the OIE (World Organisation for animal health) regarding the capture, retention, livestock, collection, transport, treatment, and slaughter of animals, if applicable to the supplied products.

COIN calls for paper, packaging or other timber products come from responsible sources or from recycling.

COIN asks that the Partners sustain development of the communities involved in the supply chain of the product, contributing to their social and economic welfare.

As regards products containing diamonds, precious stones and metals, the Company asks the Partners joining certification schemes whose purpose is to put an end to trade in stones from conflict zones. It also asks that extraction does not cause any environmental damage, either directly or through subsequent contamination from residues or waste rocks.

COIN requires that suppliers who work in the field of perfumes and cosmetics guarantee that their formulations and packaging components are safe for their intended use and in





compliance with all applicable laws. It also calls for the guarantee that the ingredients of the formulations have not been tested on animals.

ENVIRONMENT

COIN requires that products come from activities conducted in an environmentally responsible manner, in accordance with the legal requirements and environmental regulations. Partners must encourage its suppliers to commit to continuous improvement in order to minimize their environmental impact.

We ask our partners to verify with their suppliers compliance of their air emissions with statutory requirements.

COIN asks its Partners to monitor their suppliers for good management of water, to ensure its minimum consumption, and for use of adequate systems of control in relation to wastewater effluents.

COIN requires the prohibition of the use of substances that are subject to national or international bans as well as of substances subject to the REACH regulation for evaluation, registration, authorisation and restriction of chemicals.

Hazardous substances should be kept safely and be accompanied by material safety data sheets (MSDS) updated accordingly.

COIN asks to minimize the use of hazardous substances.

COIN asks for a guarantee that suppliers of Partners act in compliance with the law in handling, storage, safe transport of waste generated by their own activities.

COIN asks to minimize landfill waste and encourage recycling.

COIN asks partners to monitor power consumption and adopt measures aimed at saving and reduction of greenhouse gas emissions.

SUSTAINABLE PRODUCTS DEVELOPMENT

COIN encourages Partners to consider the entire life cycle of products, in order to optimize the environmental performances and maximize the positive impact. It asks where possible, to make use of reusable, renewable and recyclable materials for packaging, transport and storage of the products

APPLICATION AND COMPLIANCE WITH THE CODE OF CONDUCT

COIN asks Partners to adhere to this code, and to inform their suppliers, employees and interested parties accordingly. In the event of a potential negative impact for the product or service provided to the Company, the Partners must proactively report the





ongoing operations and any problems or discrepancies in respect to the code. Partners must propose remedies and corrective action plans to be submitted to the Company.

COIN reserves the right to ask Partners for information with regard to compliance with the terms of this code of conduct.

COIN may, if in doubt, submit products and materials to independent tests to determine whether they are in compliance with the safety requirements.

In the event of non-performance or breach of this code, the Company reserves the right to suspend trade relations with any partner.

