



Code of Ethics



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1 Foreword by the Board of Directors of TAKA S.r.l.

Dear Colleagues,

the most valuable asset is the trust that customers and stakeholders place in our company and its products.

It is therefore our duty to renew this trust every day with correct and honest behaviour, which also includes everyone's knowledge of, and compliance with, internal rules and regulations.

TAKA S.r.l.'s Code of Ethics serves as a point of reference in our daily work to help us always behave in the right way, as a stable value system is a prerequisite for long-term success.

However, if we realise that something is not working in the right way, if we make or find mistakes, we must discuss them and react appropriately, even when it is a critical situation, as delaying is never the right way. When in doubt, we must consult with a competent person and, if necessary, ask for help.

Regardless of our diversity, origins, functions and responsibilities, the way we work, make decisions and interact, both with each other and with external parties, is determined by a set of common values, regardless of our position within our company.

Therefore, we are all responsible for the reputation and success of TAKA S.r.l. which is manifested through our attitude and behaviour.

As members of the Board of Directors of TAKA S.r.l., we are convinced that our Code of Ethics is a key element for even greater success. In this respect we have defined transparent rules and practical examples, which are illustrated on the following pages as a useful tool to guide our behaviour. We therefore ask you to read the contents carefully and invite you all to work together so that in the future TAKA S.r.l. is synonymous not only with excellent products and services, but also and especially of integrity and correctness.



"Our company success is based on our ethical way of doing business. This is why TAKA S.r.l.'s Code of Ethics has been developed further: it now embraces a broader family of principles and behaviours, not only to preserve, as stipulated by law, safety, freedom and human dignity, but above all to stimulate us to always do better and continue to grow responsibly."

President of TAKA S.r.l.
Giorgio Costenaro

2 Our social responsibility

Social responsibility for TAKA naturally involves observing and complying with laws.

Therefore, in making a business decision, we are obliged to comply with the legal framework applicable in the context in which we act.

Consequently, every employee must be aware of his or her social responsibility, especially for the well-being of people and the environment, and ensure that our company makes a contribution to sustainable development.



3 Human Rights

INTRODUCTION

The European Convention for the Protection of Human Rights and Fundamental Freedoms and the United Nations Universal Declaration of Human Rights defined the obligations and tasks that the international community is obliged to perform with full respect for human rights.

COMPANY PRINCIPLE

We protect, observe and promote worldwide the existing legal standards for the protection of human and children's rights (hereinafter referred to as 'human rights') in accordance with fundamental universal principles.

We therefore do not allow any kind of exploitation of child, forced or compulsory labour and any form of human trafficking and modern slavery.

This applies not only within our company but also to our company but also for our business partners.

MY CONTRIBUTION

As an employee, I too can contribute to the respect of human rights, considering them as a fundamental guideline, paying particular attention to any violations that may occur in my working environment.

If I notice behaviour that violates human rights in my work context, I take action to prevent such violations from occurring or to put an end to them.

If necessary, I inform my superior or the management.

4 Equal opportunities and equal treatment

INTRODUCTION

Equal opportunities and equal treatment are the basic prerequisites for transparent, fair and unbiased relationships.

TAKA Srl accordingly promotes diversity, tolerance and human relations under the banner of respect and cooperation.

In this way, it will be possible to achieve the maximum in terms of productivity, competitiveness, innovation, creativity and efficiency.

COMPANY PRINCIPLE

We give everyone the same opportunities, spread a culture of promoting inclusive and non-discriminatory language, do not tolerate the inequality of any individual on the basis of ethnicity or nationality, of gender, religion, personal worldview, age, disability, sexual orientation, skin colour, political opinion, social background or other aspects protected by law.

We believe that the values of inclusion and diversity are the pillars of our company: we are committed to building a work environment that is open to sharing ideas and experiences, collaborative, respectful, and aimed at the full realization of people, believing that the integration of diversity is a strength in a work group. The selection, hiring and development of our employees is fundamentally based on their

skills and abilities without discriminating against sexual orientation, religion and race.

MY CONTRIBUTION

As an employee, I respect the principles of equal opportunity and equal treatment and urge everyone around me to do the same.

If I witness incidents of violation of these principles (e.g., discrimination, harassment or bullying), I report such behaviour to the human resources.

If I cannot intervene directly, I report the incident to the Human Resources Manager or one of the Corporate Managers.

5 Product conformity and safety

INTRODUCTION

Every day countless people come into contact with our products and services.

Our Company has a responsibility to prevent, as far as possible, risks, damages, and hazards that may impact the health, safety, environment, and property of our customers or third parties, resulting from the use and operation of our products and services.

COMPANY PRINCIPLE

It is not only a legal obligation but also our goal, to comply with legal requirements, regulations and internal standards applied to our products, ensuring that they are constantly and systematically advanced by means of processes, facilities and product verification in compliance with legal requirements.

On this we make no compromises and ensure that in the event of any disagreements, appropriate action can be taken promptly.

MY CONTRIBUTION

If I notice, or have doubts, that our products may constitute a danger or that standards are not being met, I work to address the problem.

I report to my supervisor and to the competent offices of the company.

6 Environmental

INTRODUCTION

TAKA offers high-quality HMPUR polyurethane adhesives for interior (furniture) and exterior (windows) and other applications. Taka is environmentally aware and sensitive, which is why it is working to achieve ISO 14001 certification. In this regard, Taka has increased the use of renewable energy and adopted a recycling-focused policy that contemplates judicious waste management. Purchasing raw materials obtained from the cleanest sources has also become a preferred option over time, underscoring TAKA's emphasis on environmental issues.

COMPANY PRINCIPLE

The Company is committed to fostering increasing environmental compatibility and sustainability of its products, production sites and services, aiming at environmental protection, advanced and efficient technologies, applicable to the entire life cycle of our products, while respecting its own peculiarities.

From the earliest stages of development and production, our Company aims at appropriate use of natural resources, ensuring constant attention to reducing their environmental impact, in compliance with environmental protection laws and regulations.

We also constantly evaluate the environmental compatibility of our products and production processes, optimizing them where necessary. We responsibly play our role as community members and policy partners by seeking dialogue with both the concepts of future mobility and ecologically sustainable development.

MY CONTRIBUTION

As part of my activities, I take environmental issues into account, using resources and energy wisely and wisely. I ensure that my activities have the least possible impact on the environment and comply with relevant laws and regulations.



7 Gifts, hospitality and invitations

INTRODUCTION

“Benefits” in the form of gifts, hospitality and invitations are very common in business relations and are permissible as long as they remain within established limits and do not violate internal rules or legal regulations.

If such benefits, however, exceed the permitted limit and are adopted to condition the conduct of third parties, they may result in legal action against those involved.

MY CONTRIBUTION

I carefully read the guidelines on how to behave regarding gifts, hospitality and invitations and I strictly comply with them. In this context, I guide my conduct and inquire about the existence or possible occurrence of conflicts of interest.

COMPANY PRINCIPLE

Internal guidelines on how to behave regarding gifts, hospitality and invitations define what benefits are appropriate and what verifications should be made before accepting or offering them.

8 Anti-corruption behavior

INTRODUCTION

Corruption is a serious phenomenon in business relations. It causes, for instance, decisions made on the basis of non-objective motives, prevents progress and innovation, distorting competition and harming communities. Corruption is prohibited. It may result in sanctions for TAKA S.r.l. It's criminal liability for the employees involved.

COMPANY PRINCIPLE

The key to our success is the quality of our products and services. That is why we do not tolerate any form of corruption and therefore offer benefits to business partners, customers or other external parties only in accordance with the law and in line with existing rules.

MY CONTRIBUTION

I never engage in corrupt practices, either by offering or accepting bribes, directly or indirectly. I proactively inform myself about internal regulations before offering or accepting gifts, invitations, or hospitality. If I become aware of any instances of corruption, I immediately report them to company management.

9 Our responsibility at the workplace

Protecting the health and safety of each individual employee is the primary concern of TAKA S.r.l.

The protection and security of employee and customer data and information, as well as the company's assets (including know-how) and property, are also a priority for TAKA S.r.l.

The principles in Chapter 10 come from TAKA S.r.l.'s commitment to a safe and secure workplace.



10 Workplace safety and health protection

INTRODUCTION

Taka S.r.l. is responsibly committed to the safety and health of workers, ensuring their protection and safeguard, in accordance with national regulations and company rules governing this matter.

COMPANY PRINCIPLE

We protect and promote the health, well-being, and job satisfaction of our employees by continuously improving working conditions and implementing various preventive and health promotion measures.

MY CONTRIBUTION

I adhere to health and safety regulations, always ensuring the safety of my colleagues and business partners. I contribute to the promotion of all measures required by law to guarantee a safe working environment for everyone.

Finally, I actively contribute to protecting my own health by voluntarily participating in the company's health prevention programs.



11 Privacy

INTRODUCTION

To protect the right to privacy, there are specific legal provisions for the processing of personal data.

The collection, storage, processing, or other use of personal data is subject to the data subject's consent, as defined contractually and in compliance with applicable law.

COMPANY PRINCIPLE

We safeguard the personal data of employees, former employees, customers, suppliers, and other data subjects. We collect, process, use, and store personal data only in compliance with applicable laws.

MY CONTRIBUTION

I ensure that personal data is collected, stored, processed, or used exclusively with the explicit consent of the individual concerned, as outlined in our agreements and in accordance with current regulations.

All systems involved in the processing of information are secured to protect the confidentiality, integrity, availability, traceability, and reliability of the data, preventing any unauthorized access.

In case of doubts, I consult my supervisor or, regarding security measures, the IT department.

12 Security and protection of information, know-how and intellectual property

INTRODUCTION

TAKA S.r.l. possesses valuable technical know-how that is crucial to our success. Our relationship with employees is built on mutual trust. In the course of their duties, employees may have access to confidential data and information.

Unauthorized disclosure of this confidential knowledge can result in significant losses for the company and may lead to disciplinary action, as well as civil and criminal penalties for the employee involved.

COMPANY PRINCIPLE

We are fully aware of the importance of our company's know-how and we protect it rigorously, while also respecting the intellectual property of our competitors, business partners, and other third parties.

MY CONTRIBUTION

I treat all information of TAKA S.r.l. with the utmost confidentiality. I am prohibited from disclosing any unauthorized information regarding the company's know-how or production methods, under any circumstances.

My duty to keep information confidential continues even after I leave the company, until the information becomes publicly available.

14 Use of company goods

INTRODUCTION

Information technology (IT) and electronic data processing (EDP) are now integral parts of TAKA S.r.l.'s operations, but they also pose a significant number of risks. These include data compromise due to malware, data loss caused by programming errors, and data breaches (for example, by hackers).

COMPANY PRINCIPLE

We pay close attention to the security of our information systems and electronic data processing, and we comply with all applicable regulations.

MY CONTRIBUTION

I carefully read the IT security rules and comply with all regulations contained therein.

I am aware that the unencrypted exchange of data (e.g., via email or USB drives) is not a secure means of communication.



14 Use of company goods

INTRODUCTION

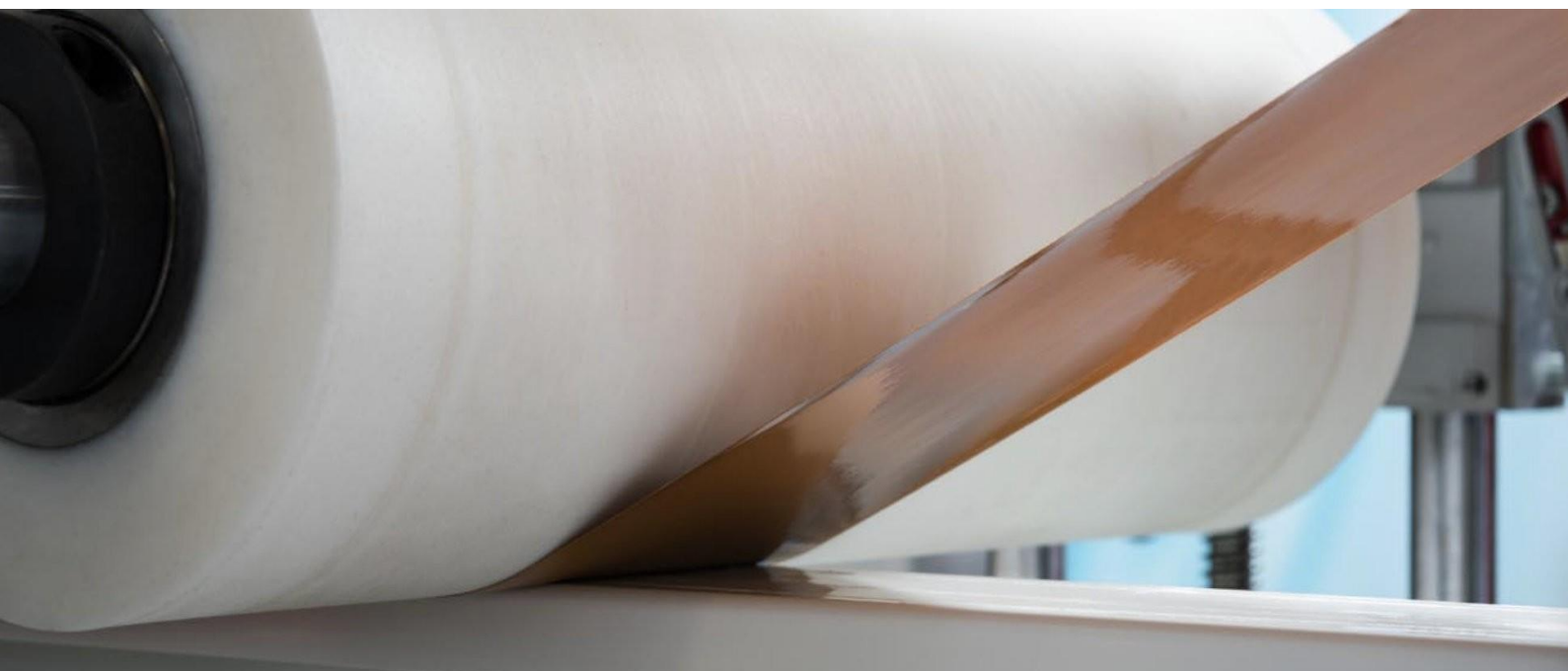
The tangible and intangible assets of TAKA S.r.l. are provided to enable our employees to achieve the company's objectives. Therefore, they must be used exclusively for business purposes.

COMPANY PRINCIPLE

We handle the company's assets with care and use them solely for business purposes.

MY CONTRIBUTION

I comply with all company policies and procedures concerning the use of company property, as communicated to me.



15 Information

For further information or clarification regarding the Code of Ethics, both internal and external contacts are available.

More information can be found at: <https://taka-adhesives.it/>.



16 Workers' representation

Recognizing the fundamental right of all workers to establish union representation within the company, we are committed to collaborating with labor representatives in a trusting and transparent manner. Our goal is to foster a constructive and collaborative dialogue aimed at achieving a legitimate balance of interests.

Our corporate culture is founded on the principle of maintaining professional relationships with labor representatives, free from any form of privilege or discrimination.

The future of TAKA S.r.l. and its employees hinges on a spirit of collaboration in resolving any disputes and a commitment to social responsibility in order to ensure economic competitiveness and innovation.

Equally important, and the subject of shared goals, are the company's profitability and job security.

17 Reporting of potential irregularities

Our first point of contact for any doubts or questions regarding the Code of Ethics or Model 231 is your direct supervisor, the Human Resources Manager, or the Company Management. Any recipient who becomes aware of any violation of the principles contained in the Code of Ethics, company procedures, or Model 231 may directly contact the Supervisory Body established by the company pursuant to Legislative Decree 231/2001 or the Whistleblowing Officer.

Any form of retaliation or discrimination following such a report is prohibited.

TAKA Srl has appointed a single-member supervisory body that can be contacted using the software available at the following link:

<https://private.mygovernance.it/mywhistleblowing/taka/69127>

18 Thoughts that guide us in making a decision

Should I have doubts about the conformity of my conduct with the principles of the Code of Ethics in a particular case, I could pose the following questions:

1. "In making this decision, have I considered all 'relevant factors' and evaluated them correctly?"
2. "In making my decision, am I certain that I am acting within the bounds of internal provisions and 'legal regulations'?"
3. "Will I remain committed to my decision when it is made 'public'?"
4. "Would the Company have made the same decision in 'similar cases'?"
5. "Would I still consider my decision to be justified if my Company had to defend it in the face of 'public opinion'?"
6. "Would I accept my decision if I were the 'person affected'?"
7. "What would 'my family' think of my decision?"

If I answer 'yes' to questions 1 through 6 and if the answer to question 7 is also positive, then it is very likely that my conduct conforms to our Code. If any doubts remain, I should consult the individuals identified in this chapter.

