



Ethical Code



Approved by the Board of Directors on May 6th, 2020

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Taka Srl



TAKA 1

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36064 Colceresa (VI) Italia



TAKA 2

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36064 Colceresa (VI) Italia



TAKA 3

Via dell'Industria, 4
36060 Pianezze (VI) Italia

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

Dear Colleagues,

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

It is therefore our task to renew this trust every day with correct and upright behaviour, which also includes the knowledge of and compliance with the internal rules and regulations of the law.

The Code of Ethics of TAKA S.r.l. 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 lasting success.

Regardless of our diversity, origins, functions and responsibilities, the way we operate, 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.

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.

We, as members of the Board of Directors of TAKA S.r.l., are convinced that our Code of Conduct 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 content carefully and invite you all to work together so that in the future TAKA S.r.l. will not only be synonymous with excellent products and services but also with integrity and correctness.



'Our business success is based on our ethical way of doing business. This is why TAKA S.r.l.'s Code of Ethics has evolved further: it now embraces a wider 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.'

Founding partners of TAKA S.r.l.
Giorgio Costenaro and Remo Baldassin

2 Our social responsibility

Social responsibility for TAKA naturally involves observing and complying with the law. Thus, in making a business decision, we are bound to comply with the legal regulations in force 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 contributes to sustainable development.



3 Human Rights

PREMISE

The *European Convention for the Protection of Human Rights and Fundamental Freedoms* and the *United Nations Universal Declaration of Human Rights* define the obligations and tasks that the international community is required to carry out in full respect of human rights.

BUSINESS PRINCIPLE

We protect, observe and promote all over the world, the laws in force on the defence of human rights and children (hereinafter "human rights") according to fundamental universal principles.

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

What has been said is valid not only within the company but for business partners as well.

MY CONTRIBUTION

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

If I notice behaviours violating human rights in my work environment, I work to prevent or stop such violations.

If necessary, I inform my supervisor or the management.

4 Equal opportunities and equal treatment

PREMISE

Equal opportunities and equal treatment are the fundamental prerequisites for transparent, loyal and prejudice-free relationships.

TAKA S.r.l. consequently, promotes diversity, tolerance and human relationships in the name of respect and collaboration. This will help you get the most out of it in terms of productivity, competitiveness, innovation, creativity and efficiency.

BUSINESS PRINCIPLE

We give everyone the same opportunities, we spread a culture of promoting inclusive and non-discriminatory language, we do not tolerate the inequality of any individual based on ethnicity or nationality, gender, religion, personal view of the world, age, disability, sexual orientation, skin colour, political opinions, social background or other aspects protected by law. We believe that the values of inclusion and diversity represent the pillars of our company: we are committed to building a work environment open to the sharing of ideas and experiences, collaborative,

respectful and aimed at the full realization of people, in the belief that the integration of diversity is a strength in a work team. The selection, recruitment 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 opportunities and equal treatment and urge all those around me to do the same.

If I witness incidents of violations of these principles (e.g. discrimination, harassment or mobbing), I report such behaviour to the persons concerned.

If I can't intervene directly, I report the incident to the Human Resources Manager or to one of the Company Managers.

5 Product Compliance and Safety

PREMISE

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

Our Company is responsible for preventing, as far as possible, risks, damages and hazards that may impact the health, safety, environment and property of our customers or third parties, arising from the use and management of our products and services.

BUSINESS PRINCIPLE

It is not only a legal obligation but also our goal, to comply with the legal regulations, regulations and internal standards applied to our products, ensuring the cutting edge of the latter in a constant and systematic way, through processes, structures and product testing, in compliance with the legal provisions.

We do not compromise on this, and we make sure that, in the event of any differences, can be taken appropriate measures in a timely manner.

MY CONTRIBUTION

If I notice, or I have doubts, on the fact that our products may constitute a danger or that the rules are not respected, I am working to combat the problem. I report to my supervisor and to the competent offices of the company.

6 Environmental protection

PREMISE

TAKA offers high-quality HMPUR polyurethane adhesives for interiors (furniture) and exteriors (windows) and other applications. Taka is sensitive to issues related to respect and protection of the environment, which is why it is working to achieve ISO 14001 certification. In this regard, Taka has increased the use of renewable energy and has adopted a policy aimed at recycling that contemplates careful waste management. The purchase of raw materials obtained from cleaner sources has also become a preferential channel over time, which underlines the importance that TAKA reserves for environmental issues.

BUSINESS PRINCIPLES

The Company is committed to promoting ever greater compatibility and environmental sustainability of its products, production sites and services, aiming at respect for the environment, advanced and efficient technologies, applicable to the entire life cycle of our products, respecting their peculiarities.

Right from the development and production phases, the company aims to make appropriate use of natural resources, ensuring constant attention to the reduction of their environmental impact, in compliance with laws and regulations on environmental protection.

In addition, we constantly assess the environmental compatibility of our products and production processes, optimizing them if necessary. We responsibly play our role as community members and policy partners by trying to dialogue with both about the concepts of future mobility and ecologically sustainable development.

MY CONTRIBUTION

I take environmental aspects into account in my activities and use resources and energy wisely and sparingly. I make sure that my activities have as little impact on the environment as possible and that they comply with the relevant laws and regulations.



7 Gifts, Hospitality & Invitations

PREMISE

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

However, if these benefits 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 with gifts, hospitality and invitations and I strictly respect them. In this context, I orient my conduct and question myself about the existence or possible emergence of conflicts of interest.

BUSINESS PRINCIPLE

Internal guidelines on how to behave with gifts, hospitality, and invitations define which benefits are appropriate and what checks should be done before accepting or offering them.

8 Anti-corruption behaviours

PREMISE

Corruption is a serious phenomenon in the context of business relations. It is the cause, in fact, of decisions made based on non-objective reasons, it prevents progress and innovation, distorting competition and damaging the community. Corruption is prohibited. It could result in penalties for TAKA S.r.l. It is criminal liability for the employees involved.

BUSINESS PRINCIPLE

The key to our success is the quality of our products and services. For this reason, 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 corrupt others and I never allow myself to be corrupted, either directly or indirectly. I inquire on my own initiative about the internal rules before offering or accepting gifts, invitations and hospitality services.

If I become aware of cases of corruption, I immediately report them to the company management.

9 Our Responsibility in the Workplace

Protecting the health of each individual worker and ensuring their safety is one of the primary interests of TAKA S.r.l.

Protection and safety also apply to the data and information of workers and customers, as well as to the company's assets (including know-how) and its assets.

The principles set out in chapter 10 derive from the responsibility of TAKA S.r.l. in the workplace.



10 Occupational safety and health

PREMISE

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

BUSINESS PRINCIPLE

We protect and promote the health, performance of activities and professional satisfaction of our employees, constantly improving working conditions and adopting multiple measures to prevent and promote their health.

MY CONTRIBUTION

I comply with the regulations on the protection of health and safety at work and never put the safety of my colleagues and business partners at risk.

I contribute to the promotion of all the appropriate measures prescribed by law to guarantee a suitable working environment to protect everyone's safety.

Finally, I actively contribute to protecting my health, voluntarily participating in the prevention measures promoted by the company in the health sector.



11 Privacy

PREMISE

To protect the right to privacy (so-called "Privacy Policy") 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 consent of the data subject, as defined in the contract and in compliance with the regulations in force

BUSINESS PRINCIPLE

We safeguard the personal data of employees, former employees, customers, suppliers and others "Interested parties". We collect, process, use and store personal data only in accordance with the legal provisions.

MY CONTRIBUTION

I ensure that personal data is collected, stored, processed or used only with the consent of the data subject, as contractually defined and in compliance with other applicable legislation.

All means involved in the processing of information must be secured in such a way as to guarantee the confidentiality, integrity, availability, traceability and reliability of the information to be protected, such as to prevent any unauthorized internal or external access.

If I have any doubts, I contact my line manager or IT for security measures.

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

PREMISE

Taka S.r.l. has a technical know-how, which are the basis of our success; the relationship between TAKA S.r.l. and its employees is based on mutual trust; TAKA S.r.l. employees, in the performance of their duties, have access to data and information Reserved. Therefore, the unauthorized disclosure of such knowledge can lead to extremely high losses for the company, as well as disciplinary sanctions or sanctions related to civil and criminal law against the employee involved.

BUSINESS PRINCIPLE

We are aware of the importance of company know-how, and we scrupulously protect it, also respecting the intellectual property of competitors, business partners and other parties
Third.

MY CONTRIBUTION

I treat all the information of TAKA S.r.l. with the utmost confidentiality.

It is forbidden to disseminate information without authorization regarding the company's know-how (and production methods) and to use it, even in a personal way, if it may cause prejudice.

My obligation of confidentiality does not end with the termination of the employment relationship but continues to operate until the confidential information becomes public knowledge.

13 Cybersecurity

PREMISE

Information systems (IT) and electronic data processing (EDP) are now an integral part of TAKA S.r.l.'s business, while at the same time entailing a long series of risks.

These include data compromise due to malware (viruses), loss of data due to programming errors or their violation (e.g. by hackers).

BUSINESS PRINCIPLE

We pay attention to the security of information systems and electronic data processing and comply with applicable legislation.

MY CONTRIBUTION

I carefully read the rules regarding IT Security and comply with the rules contained therein.

I am aware that the unencrypted exchange of data (e.g. via e-mail or USB stick) is not a secure means of communication.



14 Use of company

PREMISE

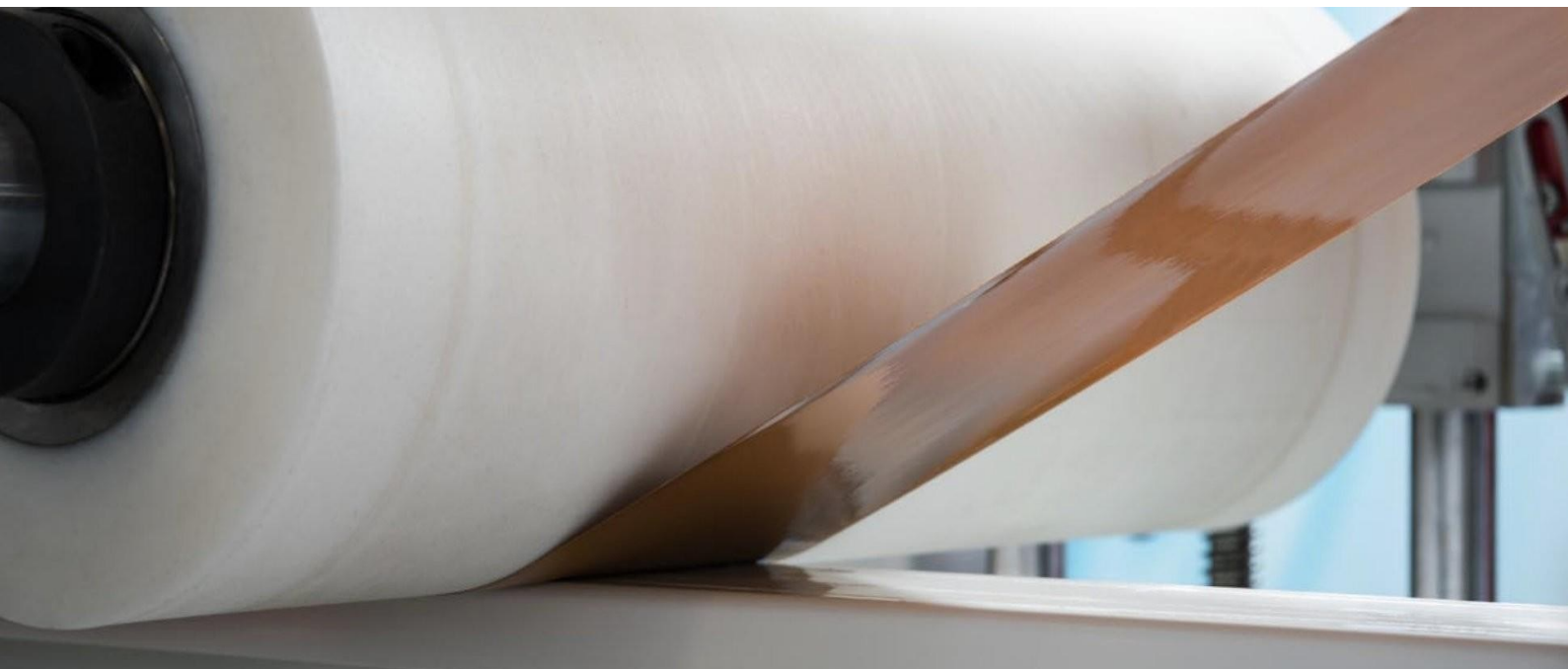
The tangible and intangible assets of TAKA S.r.l. are intended to enable our employees to achieve their goals. They must therefore be used exclusively for business purposes.

BUSINESS PRINCIPLE

We treat the Company's assets with care and do not use them for purposes unrelated to the business.

MY CONTRIBUTION

I abide by the company regulations displayed on the bulletin board and which were delivered to me by hand, which govern the use of the company's assets.



15 Information

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

More information is available at the following internet address:



16 Employee representation

Recognising the fundamental right of all

In order to establish trade union representation within the company, we are committed to collaborating with the workers' representatives with trust and transparency, in order to have a constructive and collaborative dialogue, aimed at achieving a legitimate balance of interests. Having professional relations with workers' representatives without providing for privileges or discrimination is an integral part of the our corporate culture.

The future of TAKA S.r.l. and its employees passes through the spirit of collaboration in the resolution of any conflicts and social commitment to ensure competitiveness and innovation.

Of equal importance and the object of common objectives are the profitability of the company and the safeguarding of employment.

17 Notification of any irregularities

Our first point of contact in case of doubts or questions about the Code of Ethics is your direct superior, the workers' representatives, the Human Resources Manager, the Company Management.

Anyone among the Recipients who becomes aware of any type of violation of the principles contained in the Code of Ethics may contact the Supervisory Body established by the company, pursuant to Legislative Decree 231/2001, which also performs the function of Guarantor with respect to the Code of Ethics. The Supervisory Body will guarantee the author of the report from all sorts of repercussions.

The Supervisory Body is composed of two Members. They can be contacted at the addresses below: odv@taka.it

This e-mail box is dedicated to anonymous reports and accessible only to professionals who are external members of the Supervisory Body.

Postal address:

«To the attention of the Supervisory Body» of TAKA S.r.l., via dell'industria, 4, 36060 - Pianezze (VI).

18 Reflections that guide us in making a decision

If in a specific case I have doubts about the compliance of my behaviour with the principles of the Code of Ethics, I can ask myself the following questions:

1. In making a decision, did I take into account all the “relevant aspects” and assess them correctly?
2. In making my decision, am I sure that I am moving within the limits of internal provisions and “legal regulations”?
3. Will I stick to my decision when it is made “public”?
4. Would the same decision be taken by the Company in “other similar cases”?
5. Would I continue to consider my decisions right if my company were to support them in front of the “public opinion”?
6. Would I accept my decision if I were the "person concerned"?
7. What would "my family" think of my decision?

If I answer “yes” to questions 1-6, and if the answer to question 7 is positive, then most likely my behaviour is in accordance with our Code. If there are still any questions, I would like to address the subjects mentioned in this chapter.

