

MIDA®

CONTEMPORARY FURNITURE

CODE OF ETHICS

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1. MIDÀ PROFILE AND MISSION

Midà srl is an Italian bespoke furnishing company which operates on an international level and seamlessly combines artisan tradition with industrial efficiency. All aesthetic and creative possibilities are created with Made in Italy attention and skill, coupled with the structured criteria of production engineering and creation typical of a solid business. The strong point of our company is a focus on the uniqueness of all products, grounded in a respect for the identity and aesthetic language of our customers, without neglecting research, the processing of materials and an Italian pleasure for living. Midà includes designers, artisans and technicians with a profound knowledge of all types of home and public interiors, from hotels, stores and show rooms to residences and vessels. The Midà Contract, Store & Showroom, Interior in Motion and Residential divisions implement projects which conserve the allure of tailored solutions, while embracing a wide array of challenges through developing specific solutions, materials and technologies. Midà takes the utmost care of its processes and materials, with particular focus on quality standards and continuous improvement. It has the courage to experiment with new solutions and embrace new challenges. A thirst for innovation coupled with in-depth research into techniques and equipment are seamlessly blended with the experience of tradition and Made in Italy style.

2. RECIPIENTS

This Ethical Code is addressed to all those who in various capacities collaborate with Midà, in particular:

- members of the corporate body,
- all employees, regardless of their type of contract, their position or contractual framework
- suppliers of goods and services, consultants, agents and brokers etc.,
- customers, dealers and affiliates

3. VALUES

Values are principles that distinguish an individual or characterise a group and influence the selection between possible modes, means and the ends of action.

- **HONESTY, INTEGRITY AND GOOD FAITH:** The recipients of this Ethical Code must comply with the regulations in force in the countries where they operate. Under no circumstances is it justifiable to act in conflict with the laws, even if it is done with the intent of benefiting Midà. The company's integrity is based on the alignment of its objectives with our values. Midà cultivates relationships with its associates and with the market by adhering to this Ethical Code and remaining true to itself. It acts in good faith in all activities and decisions and in all the negotiation phases with the genuine conviction not to wrong anybody.
- **SOUND, COHERENT AND EFFICIENT MANAGEMENT:** In order to ensure business continuity and sound management, the Company manages its own production, accounting and finances. Efficiency in management is achieved through the professional and organisational inputs that each of the human resources provides in compliance with the principles of professionalism, transparency, fairness and honesty. The principle of efficiency requires that every task should be carried out with the highest standards for each sector and job profile. The commitment to offer and deliver services tailored to the customers' requirements and the highest standards of professionalism, dedication, loyalty, honesty, mutual respect and spirit of collaboration must be pursued with our services and service delivery.

- **PRIVACY:** Recipients shall ensure the confidentiality of the information acquired through the operations performed on behalf of the company. Recipients are required to process data and corporate information solely within and for the purposes of their work and, shall not disclose (communicate, broadcast or publish in any way) sensitive and confidential information without the express consent of the Company in compliance with the D.Lgs.196 / 03 (known as Privacy Law).
- **EFFECTIVENESS OF SERVICE:** The aim of Midà and of those working on its behalf, is to fulfil the customers' and clients' expectations in terms of quality, cost and promptness in the delivery of the services. This creates value for the CUSTOMER, based on the understanding of their needs, to the full satisfaction of their expectations.
- **CO-OPERATION AND DEVELOPMENT OF HUMAN RESOURCES:** human resource management is based on respect for the personality and professionalism of each individual. Midà places human resources at the centre and values the commitment of those who express the desire to be part of the change. Midà highlights the competences and skills of each individual member of staff, which is essential for their advancement and promotes the development of human resources through training and professional development courses. The company also recognizes the importance of collaboration and the development of synergies, as well as the importance of teamwork
- **TRANSPARENCY:** For Midà transparency means open and clear communication with its interlocutors. All procedural rules, established according to objective and verifiable criteria are fully explained to our suppliers and collaborators. We also ensure that our suppliers and collaborators have the technical and professional competences and the means/instruments to cope with commissioned work. Transparency is also a fundamental principle in establishing a relationship of mutual trust and respect, which allows us to understand the buyer's needs and ensure assistance and professionalism in the solutions proposed by Midà.
- **HEALTH AND SAFETY:** employees and collaborators are indispensable for the existence and future development of Midà. Safety in the workplace is fundamental. Midà undertakes to spread and consolidate a culture of safety, ensuring tht workplces meet national and international health and safety standards. The employees' and contractors' health is intended not only as the absence of disease but also as psychological, physical and social well-being. We try to minimize risks adapting work to the individual, in particular with regards to the organization and design of the workplace, the choice of equipment and work and production methods. It is also important to follow technical innovation and educate employees accordingly.

4. RULES OF CONDUCT

- **GENERAL RULES OF CONDUCT:** Midà grounds its activities on the values and rules of conduct contained in this Code. The fundamental principle is compliance with the laws in force in all countries in which it operates. It recognizes the centrality of human resources and believes that the key to success in any business is the professional contribution of people operating in a climate of fairness and mutual trust. Assessments during staff recruitment and career development, are based solely on the correspondence between expected profiles and required profiles and transparent and verifiable considerations on merit. The recruitment of candidates is carried out in full respect of the current regulations concerning time, including all necessary background checks in hiring foreign workers. Midà aims to have a sound and prudent management, which limits risks and gives financial stability. Regular checks are carried out on the adequacy and effectiveness of the company's

organization and when a problem occurs appropriate measures are taken promptly. Midà aims to promote the principles contained in this document and to raise awareness.

- **CYBERCRIME PREVENTION:** Midà does not allow the alteration of a computer or electronic system or the unauthorised access to operational data, information or programs designed to provide the company with an unfair profit to the detriment of the state. Also, it does not allow unauthorised access to computers or electronic systems; the unlawful possession and diffusion of access codes or programs intended to damage computer or telecommunications systems; the installing of devices that unlawfully intercept, prevent or interrupt computer or electronic communications; the damage to information, data and computer programs and computerized systems.
- **PREVENTION OF OFFENCES OF ORGANIZED CRIME, TRANSNATIONAL CRIME AND CRIMES AGAINST THE PERSON:** the company considers public policy a fundamental interest of the society in which it operates, and therefore condemns the establishment of relationships with individuals whose behaviour is illegal or unethical. Committing national or international crime, or aiding, even if indirectly, the realization of alleged offences is illegal. Individual freedom is a fundamental value. Behaviour that could in any way result in crime against the person is forbidden.
- **PREVENTION OF CORPORATE CRIME:** Midà expressly prohibits any behaviour aimed at altering the accuracy of the data and information contained in the statements, reports or other corporate communications. It is forbidden to disseminate false or misleading information, or deliberately hinder in any way the public supervisory authority, offer money or other benefits to private parties with a view to securing an illegal or undue gain.
- **PREVENTION OF CRIMES OF TERRORISM:** Midà recognises the centrality of the state and prohibits the use of the company's resources for the direct or indirect funding of terrorist activities or the subversion of democracy.
- **CRIME PREVENTION RELATED TO HEALTH AND SAFETY AT WORK:** in order to protect the safety of workers, Midà takes all necessary measures to safeguard the physical and moral integrity of its workers. Compliance with current legislation on health, safety, and hygiene of workers is considered a priority. Therefore, the risks to workers are mitigated at the source by choosing the materials and the most appropriate and least dangerous equipment. The unavoidable risks are properly assessed and mitigated through appropriate collective and individual security measures. The information and training for workers is widespread, and updated with reference to the specific task being performed. The employees, each within their jurisdiction, are required to ensure full compliance with the law, the principles of this Code and corporate procedures and any other internal provision established to ensure the protection of health, safety and hygiene in the work place.
- **PREVENTION OF ILLEGAL MONEY LAUNDERING:** Midà condemns all forms of crime against property in the widest sense of the term. Thus, it refrains its employees from any conduct that may even indirectly facilitate criminal activity such as receiving stolen goods, money laundering or use of money or goods of illegal origin.
- **PREVENTION OF CRIMES AGAINST TRADE AND INDUSTRY:** Midà safeguards the rights of industrial and intellectual property, including copyrights, patents and trademarks according to the established policies for their protection and also respects the intellectual property of others. It is therefore contrary to the unauthorized reproduction of software, documentation or other material protected by copyright. In particular, it complies with the restrictions specified in the license agreements relating to the products of third party production/distribution, or those stipulated with its software providers and prohibits the use or reproduction of software or documentation as permitted by each

license agreement. It prohibits any behaviour that causes the loss, theft, unauthorized disclosure or misuse of industrial and intellectual property and confidential information. Midà recognizes that “Made in Italy” is a great opportunity for the development of Italian businesses, a strength to implement and protect. As a result, they condemn those behaviours that prevent or disturb the freedom to operate and the normal development of industry and commerce; Midà models its conduct towards competitors on the principles of loyalty and correctness.

- **USING THE TIME AND PROPERTY OF THE COMPANY:** it is not permitted to carry out a task that is not related to the company or to carry out a job on company premises or during working hours. In addition, it is not permitted to use any company property, including equipment, telephones, materials, resources or private information unless formally authorised by the company in writing. Midà requires the commitment of all employees in order to safeguarded all the company’s assets, tangible and intangible assets, these include the Midà Contemporary Furniture brand, it’s property, furniture and furnishings, equipment, tools, files, money and securities, computers, telephones and related accessories, software and computer-held data including e-mails, vehicles, documents, reports, presentations, information not in the public domain, all information including confidential documents, know-how and intellectual property (relating to models, planning, methods and means of production, e.g. templates, data sheets, plans, sketches, photographs, etc.) as well as the solid reputation and image of the company. Everyone has the responsibility and duty to protect company assets assigned to them, use them correctly in accordance with corporate policies and prevent the loss, destruction, damage, misuse, theft or sabotage of such assets. The use of property or business service that is not intended to benefit the company may take place only if expressly authorized.

5 DISCLOSURE OF THE CODE OF ETHICS AND SUPERVISORY BOARD.

This Ethical Code is brought to the attention of all recipients. Midà is always available for any necessary clarification of the provisions contained in this code. Any doubts concerning the application of this code must be promptly discussed with a supervisor. Midà promotes the dissemination of the Code, implements and updates it, working to prevent or curb any violations of the code through the relevant corporate positions (eg. Human resources, administration, etc.). The Company will also publish the Code of Ethics on the company Internet network for Third Party Beneficiaries and indeed to any other party.

