

Leva S.p.A.

**ETHICAL
CODE**

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1. Introduction.

The Leva company (hereinafter also referred to as the "Company") is a company founded in Turin in the 1950s, specializing in the processing of leather, vinyl and fabrics, with registered office in Grugliasco, via Pietro Ferrero, n. 7. Since the 1980s, the Company has been mainly dedicated to the design and manufacture of leather and fabric components within the *automotive interior* market. In particular, the manufacturing processes that take up Leva consist of high frequency welding, ultrasonic welding, numerical control cutting, die-cutting, sewing, saddling and gluing.

The production growth objectives were achieved in compliance with the regulations on environmental protection, responsible use of resources, safety in the workplace, as well as competition.

Leva therefore proposes to continue to operate by reconciling the goal of achieving ever higher quality standards with attention to the environment, the well-being and safety of human resources and attention to the consumer.

This document, called the "Code of Ethics" (hereinafter the "Code"), therefore defines the values and principles of conduct that Leva intends to inspire in carrying out its business and conducting its business.

It contains the set of rights, duties and responsibilities of the company towards stakeholders, such as, by way of example, shareholders, employees, suppliers, consultants, customers, Public Administration, regardless of what is required by law.

This Code is an integral part of the organization, management and control model adopted by the Leva company pursuant to Legislative Decree no. Law 8 June 2001, n. 231.

2. Recipients.

All those who work in the interest of the Leva company are required to comply with the Code and in particular:

- Partners of the company, also in the form of legal people;
- Legal representatives and directors of the company;
- Members of the Board of Statutory Auditors and of the Supervisory Body;
- Attorneys general, special attorneys, persons with power of attorney ad acta and their supervisors;
- Company executives;
- Employees and subjects in a coordinated and continuous collaboration relationship, or project collaboration;
- Subjects who have consultancy or professional service, agency, mandate, with or without representation, mediation and business procurement relationships with the Company;
- Subjects who have economic relations with the Company, such as suppliers or business partners.

The subjects required to comply with the principles of the Code are hereinafter referred to as "Recipients".

3. Publication of ethical code.

Leva undertakes to promote the sharing, adhesion and dissemination of this Code, working to ensure that the principles set out in it are acknowledged and observed by all recipients.

The administrative body and individuals in top positions are entrusted with the task of implementing this principle, identifying the most suitable means to disseminate this Code.

In any case, staff are ensured adequate knowledge and understanding of the Code through the implementation of training courses.

Leva undertakes to distribute a copy of this Code to all employees and to any person who has business relations with the Company, as well as to post it in a place accessible to all those who enter the Company's premises.

4. General ethical principles.

1) Compliance with the law.

In carrying out its business, Leva pursues its objectives in compliance with international, community, national, regional, provincial and municipal regulations.

To this end, the recipients of this Code are required to operate in absolute compliance with the laws and regulations in force in all the countries in which Leva operates.

Leva undertakes not to initiate or continue any relationship with persons who do not intend to align themselves with the principle of legality.

It is the duty of the company to inform employees about current regulations and related issues, ensuring an adequate continuous training program.

In no case is it permitted to pursue or realize the interest of the company in violation of the law.

2) Ethical-behavioral principles.

Leva intends to inspire the conduct of its business in compliance with the ethical principles and corporate ethics indicated below.

a) Honesty, moral integrity, fairness and responsibility.

The company considers it of fundamental importance that the conduct of the business is based on respect for ethics and the values of fairness in corporate behavior and towards third parties.

The recipients of the Code must, therefore, in carrying out their professional activity, maintain a behavior oriented towards respect for the fundamental principles of honesty, moral integrity, correctness and responsibility, establishing relationships based on loyalty, mutual respect and collaboration.

b) Transparency.

The Leva Company guarantees compliance with the value of transparency, committing itself to providing true, complete and clear information.

Leva promotes informed action and the sharing of knowledge, recognizing the value of correct information to shareholders and corporate bodies regarding the facts concerning the management of the company.

To this end, all financial, accounting and management operations must correspond to the requirements of completeness and accuracy.

c) Confidentiality.

The Leva company ensures the confidentiality of the information in its possession, refraining from seeking confidential data, except in cases of express and informed authorization and specific regulatory provisions.

All information held by Leva is treated in compliance with the laws in force regarding the protection of personal data.

The recipients of the Code are expressly prohibited from communicating, disclosing or using confidential information which, for any reason, they have come into possession of, without the explicit consent or authorization of the Company.

d) Respect for the person.

In the context of internal relations and relations with third parties, Leva guarantees respect for the fundamental rights of the individual and human dignity, avoiding any discrimination based on racial origin, age, sex, political opinions and religious belief, sexual orientation or the person's state of health.

e) Fairness and loyalty with competitors.

Leva observes the competition rules in force, operating according to the principles of correctness, fair competition and transparency and avoiding conduct that could integrate forms of unfair competition.

f) Respect for the environment.

Leva, always sensitive to the issue of sustainable development, carries out business activities in compliance with all applicable environmental protection regulations.

g) Product quality and safety.

Leva operates with the aim of offering its customers the highest standards of product quality and safety.

With this in mind, the company invests in research, guaranteeing ever higher levels of development.

Leva considers compliance with these values to be of fundamental importance for the image and reputation of the company, thus requiring the recipients of the Code to fully share and comply with them.

5. Principles in relations with employees.

a) Value of human resources.

Leva guarantees and promotes the development of human resources, establishing relationships with staff based on criteria of impartiality, fairness and fairness, enhancing individual skills in absolute respect for equal opportunities, as well as promoting the development of professionalism.

b) Duties of the company.

In order to make the most of human resources, Leva is committed to:

- comply with labor legislation, not tolerating any form of irregular work;
- proceed with the selection of personnel with exclusive attention to the correspondence of candidates' profiles to company needs and requirements, in compliance with equal opportunities for all interested parties;
- apply the merit and professionalism criteria in making any decision concerning the career or any other aspect relating to the employment relationship with its employees and collaborators;
- provide continuous and adequate training to its employees and collaborators, in order to guarantee ever greater professionalism in carrying out the tasks entrusted to them;
- guarantee full compliance with all current legislation on prevention and protection, thus ensuring a safe and healthy work environment;

- oppose, even with disciplinary sanctions or with the interruption of the employment relationship, conduct contrary to the principles of the Code or the provisions of the law.

c) Duties of the staff.

Staff are required to comply with the principles set out in the Code and demand compliance, basing their professional conduct on the principles of correctness, loyalty and efficiency.

Staff are required to:

- refrain from pursuing personal interests to the detriment of corporate interests;
- operate with prudence to protect the assigned company assets and prevent their non-compliant use by others;
- refrain from disclosure to third parties or from the use for private purposes of information acquired in carrying out the assigned activities;
- report any behavior by others in violation of the law or the principles of this Code to the manager of the area to which he belongs;

Compliance with the rules of this Code must be considered an essential part of the contractual obligations of the employees of the Leva company, pursuant to and for the purposes of art. 2104 of the Italian Civil Code

Violation of the rules of the Code may result in the adoption of disciplinary measures and lead to compensation for damages deriving from the same.

d) Conflict of interest.

Leva's employees, collaborators and consultants are required to pursue exclusively the objectives and interests of the company.

Leva undertakes to prevent and avoid any situation in which a conflict of interest may arise that could affect the independence of judgment of the parties involved in the operations.

1. Principles in relations with third parties.

In initiating and managing commercial relationships with customers and suppliers, the directors, employees and collaborators of Leva must comply with the principles of the Code and the provisions of the organization, management and control model.

It is strictly forbidden to establish and maintain relationships:

- with subjects involved in illegal activities, or committed to the crime or notoriously in connection with criminal associations;
- with subjects who do not intend to observe the ethical principles of this Code;
- with subjects who refuse to provide reasonable guarantees of reliability in compliance with the laws and principles of correctness.

a) Relations with suppliers.

Relations with suppliers must be conducted in compliance with the principles contained in this Code and in particular in compliance with the values of maximum transparency, clarity and fairness.

To this end, the contracts stipulated with suppliers must contain specific clauses aimed at ensuring compliance with the Code.

The choice of suppliers must be based on objective criteria, such as certified professionalism and competence, reliability, efficiency, quality and convenience of the service offered.

Recipients are prohibited from accepting gifts, gifts and the like from suppliers, aimed at obtaining direct benefits for themselves or for the company or obtaining

confidential information. Therefore, only the so-called "gifts of use" are allowed, which, by custom, are exchanged on festive occasions.

Recipients are required to report any attempt or situation to alter normal business relations to the Supervisory Body.

b) Purchasing processes.

Purchases must be made observing the utmost transparency and guaranteeing the traceability of operations, through an adequate documentation and archiving system.

Contracts for amounts higher than those established by the Board of Directors must be viewed, approved and signed by persons with adequate administrative powers.

c) Relations with customers.

Leva promotes the utmost impartiality in relations with customers, refusing any form of approaching customers that violates competition law or constitutes an illegal act.

Contracts and communications to customers must comply with the following requirements:

- clarity and comprehensibility of language;
- compliance with current legislation;
- completeness of information.

It is forbidden for directors and staff to make donations, gifts or benefits aimed at influencing customer choices.

2. Principles in relations with the public administration.

Leva imprints relations with the Italian or foreign Public Administration on compliance with the principles of maximum transparency and correctness, complying with the law and with the requirements of the organization, management and control model adopted.

Directors and employees are required to provide the public authorities with full cooperation.

It is forbidden to all those who exercise, even de facto, management, administration, direction or control functions in the Company and to subjects subject to the management or supervision of these, such as employees, collaborators, consultants, agents, attorneys and, in general, all third parties acting on behalf of the company to resort to any behavior aimed at obtaining an undue or illegal interest, advantage or benefit for the Company.

The people appointed by the Company to entertain relations with the Public Administration must not in any way try to illegally influence the decisions of officials or other subjects who take decisions on its behalf.

To this end, it is not permitted to offer money or gifts to managers, officials or employees of the Public Administration or their relatives, except in the case of gifts or useful uses of modest value.

Recipients who are the subject of explicit or implicit requests for benefits of any nature by members of the Public Administration must immediately suspend relations with the Entity and inform the Supervisory Body.

It is absolutely forbidden to use or present false declarations, documents or certificates, or to omit information in order to obtain contributions, funding or other disbursements from the Italian or Community Public Administration.

It is forbidden to use contributions, grants or loans received from a Public Administration for purposes other than those for which they were assigned.

In the event of participation in tenders, Leva requires absolute compliance with the law, as well as compliance with the principles of correctness, transparency and loyalty.

Compliance with the founding principles of relations with the Public Administration is also required of any third parties or consultants who represent the Company before Public Bodies.

3. Principles for keeping accounting records.

The keeping of accounting records must be carried out in full compliance with the principles of transparency, correctness and responsibility.

Each operation and transaction must be lawful, authorized, verifiable, consistent and congruous.

To this end, all operations and / or actions performed by the company must be properly recorded, thus allowing the easy reconstruction and verification of the decision-making, authorization and processing process.

It is also necessary that every single operation is reported on suitable documentation, paper and / or computerized, which certifies its characteristics and reasons and allows the identification of the person who proceeded with the authorization, execution, registration and verification.

All recipients of the Code have a specific duty to verify and certify, where required, the correctness of the information transmitted, as well as to cooperate in the correct functioning of the control system, communicating to the Supervisory Body or to their direct superior, in the form written, any omissions, falsifications or irregularities of which they became aware.

4. Principles in the use of computer systems.

The use of computer systems must be carried out in compliance with current regulations.

In carrying out its business, Leva exclusively uses IT systems including hardware and software regularly licensed.

The company grants administrators, employees and collaborators the use of their devices for the sole purpose of carrying out the tasks entrusted to them.

Each user is allowed access to every single computer and telematic system following identification, carried out through the use of logical keys (user ID and password), delivered by the system administrator and stored in such a way as to avoid theft or undue knowledge by unauthorized parties.

Users are personally responsible for the integrity of the systems, data, information and programs relating to them.

A personal *account* mailbox can be assigned to users for use. The use of electronic mail through this box is for business purposes and never for personal purposes. Incoming and outgoing e-mails from these boxes must be understood as coming from or destined for Leva and as such, it is accessible to the user's superiors.

It is the right of the company to prevent one or more users, in whole or in part, from accessing the local network as well as the internet.

Users are prohibited from using the computer systems for purposes other than that for which they are granted.

5. Control system.

In order to ensure compliance with laws and procedures, protect company assets, the health and safety of people, efficiently manage activities and provide accurate and complete accounting and financial data, Leva has created internal control procedures aimed at verify, direct and manage the activities carried out by the Company.

The control procedures must be adopted by all recipients, each within the scope of their duties.

All recipients are responsible for the definition, implementation and correct functioning of the controls.

6. Supervisory Board.

Leva has internally set up a Supervisory Board with control powers.

The Supervisory Board is an independent body that operates in compliance with the principles of impartiality and professionalism.

The duties of the Supervisory Board are:

- control over compliance with the Code of Ethics by all recipients;
- the publication of this Code to all recipients and third parties who work with the Company, through an adequate information plan aimed at promoting knowledge of the principles contained therein;
- the constant updating and adaptation of the Code, in order to ensure its constant adequacy to legislative and corporate changes;
- the interpretation of the Code, becoming a point of reference for resolving any conflict or doubt on the application of the principles expressed therein;
- protection from possible pressure or retaliation by employees who report behavior that does not comply with the Code or the organization model;
- the reporting, to the competent corporate functions, of any transgressions to the law and / or to the provisions of this Code and / or the Organizational Model;
- control over the regularity and timeliness of the imposition of the disciplinary sanctions envisaged for violators of the Code of Ethics, or of the Organization Model.

7. Sanctions.

The sanctions must be imposed promptly and immediately.

Following the ascertainment of the violation of the principles established by this Code as well as the procedures provided for therein by an employee, disciplinary measures provided for by collective bargaining may be adopted against him.

The Company may also take other measures, such as the assignment of the employee to another company area, as long as this does not lead to his demotion.

In the event of a violation of the Code of Ethics and internal procedures by the directors and statutory auditors, the Supervisory Body must inform the Board of Directors and the Board of Statutory Auditors, who will take the appropriate steps required by law.

The violation of ethical rules by third parties may be sanctioned with the termination of the contract.

To this end, it is a specific obligation to insert specific termination clauses expressed in supply or collaboration contracts, which make explicit reference to compliance with the provisions of the Code.