

## MICROTEX COTTON CLUB S.R.L. – PRINCIPLES AND POLICY ON RESPONSIBLE BUSINESS CONDUCT

### 1. Introduction

The intended recipients of this Code of Ethics include employees, collaborators, consultants, suppliers, clients, partners, agents, shippers, contract counterparties, and anyone—whether individuals or entities—who, even temporarily, establishes relationships with Microtex Cotton Club S.R.L. in pursuit of shared objectives. Each Recipient is expected to understand the Code of Ethics and its guiding principles and actively contribute to its full implementation. For Microtex Cotton Club S.R.L., ensuring product quality also means operating transparently and sustainably. Microtex Cotton Club S.R.L. is committed to ensuring workplace safety, respecting workers' rights, and avoiding any use of forced child labor, harassment, or discrimination.

Microtex Cotton Club S.R.L. also commits to protecting the environment, promoting animal welfare, and complying with current regulations on labor conditions, environmental management, and ethical business practices. This document outlines the obligations and requirements to be observed, which Microtex Cotton Club S.R.L. will monitor for compliance. Accordingly, all company personnel, from management to employees and collaborators working on behalf of the company, are called to review this document, align their behavior with its provisions, and act with honesty and integrity.

Where possible, the company will promote this document among its business partners, encouraging them and their subcontractors to adhere to its principles by suggesting appropriate conduct and actions to avoid and promoting ethical standards throughout the supply chain. The company also commits to making this document public so that all stakeholders can access it. Furthermore, the company will provide the necessary technical, economic, and professional resources to ensure the full achievement of the objectives outlined herein.

### 2. Principles and Code of Conduct

#### 2.1 Human Rights and Workers' Rights

Microtex Cotton Club S.R.L. prohibits its employees and collaborators from engaging in business relationships with suppliers who do not respect, protect, and promote human rights and labor laws. Specifically, this includes:

- **Prohibiting forced or compulsory labor:** Workers must not be forced to work under threat of penalties, nor should they be required to provide deposits or identification documents.
- **Prohibiting child labor:** Children under the legal minimum working age, or under 15 years (14 in developing countries per ILO Convention 138), must not be employed.
- **Protecting young workers:** Workers under 18 must not work night shifts or under conditions that could harm their health, safety, or moral integrity.
- **Prohibiting discrimination, harassment, and violence:** All individuals must be treated with respect and dignity, regardless of gender, age, religion, marital status, or any other personal characteristic.
- **Achieving gender equality:** Equal opportunities must be offered to all, free from discrimination based on gender, identity, or sexual orientation.

MICROTEX COTTON CLUB S.R.L.

Via Tommaso Alva Edison 6, 59100 Prato, IT | C.F./P.IVA 02269900979 | T: +39 0574 62591  
C.S. €800.000,00 | E: info@microtextcottonclub.it | PEC: microtextcottonclub@legalmail.it | SDI: PLWL6S6

- **Respecting freedom of association and collective bargaining:** The right to form and join unions and bargain collectively must be respected.
- **Ensuring safe and healthy working conditions:** Appropriate measures must be in place to prevent accidents, injuries, and illnesses associated with work activities.
- **Providing fair remuneration:** Wages and benefits must meet or exceed national legal standards.
- **Complying with working hours regulations:** Work hours must comply with national laws and sector standards.
- **Ensuring equal treatment for migrant workers:** Migrant workers should not be treated differently from local workers and must have contracts in a language they understand.
- **Protecting home-based workers:** They must receive the same protections and benefits as on-site workers.
- **Safeguarding minority groups:** Microtex Cotton Club S.R.L. is committed to respecting the rights of individuals from vulnerable groups, including indigenous peoples, ethnic minorities, and workers with disabilities.

## 2.2 Environmental Protection (Environmental and Chemical Policy)

Microtex Cotton Club S.R.L. promotes sustainable development and environmental conservation by integrating innovative improvements to minimize environmental impact. Employees and collaborators are encouraged to gain in-depth knowledge of sustainable development and to take environmentally responsible actions in their daily lives, in society, and at work. They are expected to:

- **Monitor and reduce energy and water consumption:** Commit to setting and achieving consumption reduction targets.
- **Monitor and properly dispose of wastewater:** Ensure adequate treatment of wastewater to meet legal or chosen standard requirements.
- **Monitor air emissions:** Identify and reduce greenhouse gas emissions as much as possible.
- **Properly manage solid waste disposal:** Dispose of waste in accordance with local and national regulations, prioritizing reuse and recycling.
- **Ensure responsible chemical management:** For certified products, gather and store information on chemical safety to protect users and the environment.

## 2.3 Consumer and Client Protection

Microtex Cotton Club S.R.L. is committed to fair trade, marketing, and advertising practices, ensuring the quality and reliability of products and services. Employees are encouraged to collaborate in delivering products and services that meet client expectations, refraining from misleading information.

## 2.4 Prohibition of Bribery and Corruption

The provision applies to all directors, officers, employees, and collaborators of Microtex Cotton Club S.R.L. It is against this Code of Ethics to offer any valuable object to public officials or private persons to obtain or maintain business or other advantages. Bribery, whether direct or through intermediaries, is prohibited. All relationships with public officials

must comply with the applicable regulations in the official's country, and any benefit provided must be transparent, documented, and recorded.

### **2.5 Responsible Procurement Practices**

Microtex Cotton Club S.R.L. aims to prevent adverse impacts through responsible procurement practices and promotes a supply chain that respects human rights and the environment. Staff involved in supplier selection and order management must comply with contractual supply conditions.

### **2.6 Transparency of Accounting Records**

The company commits to maintaining accurate accounting and financial records to ensure transparency and trust. Staff are expected to contribute to the company's reliability by maintaining accurate, timely, complete, and understandable records.

### **2.7 Confidentiality of Personal Information**

Microtex Cotton Club S.R.L. ensures the confidentiality of all information it possesses and compliance with data protection regulations to prevent the unauthorized disclosure of personal data.

### **2.8 Reporting Violations (Whistle-blowing)**

Employees, collaborators, and others associated with Microtex Cotton Club S.R.L. can report suspected illegal conduct, irregularities, or violations of the Code of Ethics, company procedures, and general regulations by emailing [info@microtexcottonclub.it](mailto:info@microtexcottonclub.it).

### **2.9 Disciplinary Measures**

Violations of the principles established in the Code of Conduct will result in disciplinary measures, according to applicable regulations or employment contracts, independent of any legal action against the perpetrators of such behavior.

## **3. Policy on Responsible Business Conduct**

The commitments outlined in this document must be implemented through a due diligence process to identify, prevent, mitigate, and account for actual or potential negative impacts on human rights, labor rights, the environment, and ethical business conduct.