

THEMA[®]
A Family Factory

CODE OF ETHICS

CADORE VALLEY

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THE CODE OF ETHICS OF THEMA - A FAMILY FACTORY



1. ABOUT US

The story of Thema Optical began in the unspoiled wilderness of Cadore. This family-run business, a leader in the private label sector, grew from nothing to become the global business it is today and is still based in Domegge di Cadore, where its eyewear has always been made.

Generation after generation we imagine, design and manufacture products, driven by our desire to come up with new ideas and set new trends and inspired by a world that is constantly evolving, allowing us to offer the best in quality and innovation.

Over the years we have made a name for ourselves with our made-to-measure eyewear which is suitable and can be customised for all ages and, most important of all, for all shapes of face.

Fairness, ongoing commitment and respect for people and our local area have accompanied us on our ethical journey and will continue to do so as we follow this path into the future.

2. INTRODUCTION AND PURPOSE

The Thema Optical (hereinafter Thema) Code of Ethics sets out the fundamental principles and behaviour to protect our safety, freedom and human dignity. These shared values have been drawn up to improve relations and foster an atmosphere of trust both inside and outside the company.

Compliance with the principles of this Code of Ethics is vital if Thema's reputation, reliability and success are to continue into the future. The purpose of this Code is therefore to prevent irresponsible or potentially illegal behaviour by those who work in the name or on behalf of the company, as it clearly and explicitly defines the responsibilities of every worker towards those who are directly or indirectly involved in the company's business, i.e. clients, suppliers, shareholders, employees, co-workers, public institutions and any other person interested in the company's business.

The recipients of this Code of Ethics are required to strictly and fully respect the values and principles contained herein and, through their conduct, to protect and preserve the respectability and image of the company, as well as the integrity of its economic, corporate and human assets.

This Code of Ethics does not replace or prevail over the law.

3. RECIPIENTS

Recipients are all those individuals to whom the provisions of this Code of Ethics apply, namely personnel (directly employed by the company or otherwise) and all those who establish relationships or dealings with Thema, either directly or indirectly, on a permanent or temporary basis, or work to fulfil its purpose.

All recipients of this Code of Ethics are required to abide by its contents and guiding principles, in any situation or circumstance, and to the extent of their specific duties, powers and activities.

4. DISSEMINATION AND KNOWLEDGE

All recipients of this Code of Ethics are required to be familiar with its contents, to actively contribute to its implementation and report any shortcomings or violations.

Thema undertakes to promote knowledge of the Code of Ethics among its recipients and to closely monitor compliance, providing appropriate information, prevention and control tools to ensure transparency in all activities and behaviour, intervening, if necessary, with corrective measures.

Recipients shall immediately report any violations of this Code of Ethics they may become aware of to management, so the company can promptly take all the necessary steps to safeguard its interests and all the measures it deems opportune to restore ethical standards to its business and compliance with the law, if violated.

5. MANAGING REPORTS OF VIOLATIONS

Anyone reporting a violation of the Code of Ethics will be guaranteed anonymity to protect them from possible retaliation. Reports of possible violations must be made following the instructions in the section "Reporting violations" at the end of this document.



6. GENERAL ETHICAL PRINCIPLES

6.1 Respect for the law

All actions, operations and negotiations shall be carried out in compliance with the laws and regulations of the countries in which Thema operates. No behaviour which violates the law of any country in which the company operates shall be tolerated.

6.2 Respect for the fundamental rights of the individual

Thema's activities are based on the respect of the fundamental rights of every individual, protecting their moral integrity and ensuring equal opportunities.

Internally, Thema strives to maintain a peaceful working environment where everyone can work in accordance with the law, principles and shared values; it does not tolerate any form of isolation, exploitation or harassment due to discrimination or on personal or professional grounds. Discrimination of any kind for reasons of race, language, colour, faith and religion, political affiliation, nationality, ethnicity, age, sex and sexual orientation, marital status, disability and physical appearance or socio-economic status is strictly prohibited.

Thema undertakes to monitor any potentially negative impact, whether it be direct or indirect, its activities may have in order to prevent and, if necessary, remedy it.

6.3 Respect for human resources

Thema protects and recognises the importance of human resources in improving and growing their skills and competitiveness, because employees, co-workers and workers are vital for the success of the company.

Recognition of their achievements, professional potential and skills is key to the professional growth of all Thema staff. Recruitment, training, management and professional development are carried out without discrimination and based on merit, skill and professionalism.

The organisation shall ensure a working environment which involves, motivates and fosters sharing and collaboration, where every worker can express their talent to the full.

6.4 Respect for free competition

Thema believes free competition is an asset that should be protected and acknowledges that fair and correct competition can affect the reputation and is important for the sustainable growth of the company and the market it operates in. In light of this, it refrains from conduct to secure business deals which are in bad faith or in violation of laws or regulations. Thema does not tolerate any form of corruption to obtain undue personal benefits and undertakes to respect all interlocutors, including its competitors.





7. ETHICAL PRINCIPLES IN RELATION TO THIRD PARTIES

7.1 Relations with suppliers

Thema believes that business relations with its suppliers should be based on principles of fairness, encouraging sincere and honest dialogue which everyone can benefit from.

Thema chooses its suppliers based solely on their merit, reliability and competitive economic conditions. It uses objective, unbiased and comparable criteria when qualifying and appraising suppliers, which award those who conduct their business in full compliance with internationally recognised principles regarding the protection of human rights, workers and the environment.

Thema's current and future suppliers must trust the integrity of the selection process. The company undertakes to adopt measures to prevent the risk of conflict of interest and any form of clientelism or attempted corruption.

Relations with suppliers shall therefore be based on the utmost loyalty, fairness and professionalism and the desire to give value to all the rings in our supply chain.

7.2 Relations with clients and end consumers

Customer satisfaction is a priority for Thema and it pursues it in a comprehensive, thorough and precise manner. It does everything in its power to ensure its products are of the highest standard and that its pre- and after-sales services are of the highest quality, thanks to the consummate professionalism of its employees. Delivering products with innovative designs and materials is one of the goals Thema pursues to create lasting relationships of trust with its clients and end consumers.

7.3 Relations with public institutions

In relations with the public administration, employees who, due to their duties within the company, are responsible for requesting, managing and/or administering donations, subsidies or funding from the State or another public office, shall, within the limits of their powers, ensure that these relations are conducted for the purposes for which they were requested and shall keep meticulous records of every transaction to ensure the utmost transparency and clarity of any financial operations.

7.4 Relations with the media

Relations between Thema and the mass media in general are the sole responsibility of the company departments and individuals appointed for this task and must be held in accordance with the company's communication policy and its internal procedures.

Recipients must therefore not give information to representatives of the mass media without the permission of the designated department. Any information or news regarding the company which enters the public domain must be accurate, truthful, complete, transparent, consistent and always strictly in compliance with the law (for example, concerning the protection of personal data).

7.5 Relations with competitors

Thema acknowledges that correct and fair competition is necessary if the company and the marketplace are to grow. To this end, it encourages competition based on the quality of its products and in compliance with all laws which safeguard fair competition.

7.6 Conflict of interest

All activities which could lead to conflict which, in turn, could interfere with the ability to take unbiased decisions to the detriment of the company's interests must be avoided.

Recipients must act in accordance with the law and ethical values and it is strictly prohibited to resort to favouritism, corruption or collusion to obtain benefits for themselves or others.

7.7 Gifts, courtesies and other benefits

Thema does not give or receive gifts which may be construed as going beyond the bounds of normal courtesy. Employees shall not give gifts or other benefits to anyone from whom they may receive preferential treatment in dealings with the company.



8. ETHICAL PRINCIPLES IN RELATION TO STAFF

8.1 Impartiality in the management of human resources

Thema has a duty to guarantee impartiality and fairness in the selection, recruitment, training and management of its human resources, offering equal professional opportunities for all employees and forbidding conduct that may appear discriminatory towards other persons.

The company also guarantees all its staff the same work opportunities and professional advancement, as well as salaries (including increases and incentive schemes) based not only on legal provisions and the collective bargaining contract but also on individual merit, with no discrimination of any kind.

The variable part of the salary is determined according to the achievement of clear, objective, shared corporate goals and assigned in compliance with the law, the contract and the ethical principles of this Code.

Staff are hired with regular employment contracts only and no form of irregular work is tolerated.

8.2 Health, safety and the working environment

Thema believes in the importance of promoting a culture of safety in the workplace.

It seeks to reduce risks to the physical integrity of all its workers, using information and training to make them responsible for their own conduct and guaranteeing health and safety in the workplace in compliance with applicable law.

Thema undertakes to respect the work environment and keep it fully compatible with the need to protect the health of its employees, trying not to create conditions of physical and psychological hardship and not tolerating any form of discrimination or persecution.

Environmental conditions are constantly monitored and always meet legal requirements and all instruments are provided and controls carried out to ensure this.

The company undertakes to provide appropriate training, information and instruction on health and safety, to raise awareness among its employees and co-workers of all the risks linked to the performance of their work activities and promote responsible conduct by all.

8.3 Alcohol and drugs

To ensure the safety of our employees, no alcohol or drugs are allowed in the workplace.

Working under the influence of alcohol or drugs is a risk for everyone's safety; this behaviour is strictly forbidden, it shall not be tolerated and shall be subject to disciplinary action.

8.4 Protection of company assets

Recipients are directly and personally responsible for the care, protection, efficiency and conservation of any tangible or intangible assets made available to them by the company to perform their duties. They shall use them correctly and in keeping with corporate interests.

It is strictly forbidden for recipients to use the tangible or intangible company assets made available to them to perform their professional duties for personal purposes without authorisation.

It is also forbidden to carry out any activities which are not part of an employee's assigned duties during working hours.

8.5 Environmental protection

Thema undertakes to promote measures which guarantee sustainable development and environmental protection and introduce innovative improvements to its products and services which offer environmental and social benefits.

Recipients of this Code of Ethics shall develop in-depth knowledge of issues regarding sustainable global development and the conservation of biodiversity and shall take initiatives to protect the environment in their everyday lives, in the workplace and in society. They shall take part in activities and projects aimed at protecting the environment.

The company supports the protection of the environment, investing in clean industrial technologies, encouraging the use of renewable energy sources, improving resource efficiency and supporting research into technologies with low environmental impact. It is also committed to disseminating key messages relating to environmental protection to strengthen the whole company's commitment to a culture of sustainability, and to working with suppliers who, in turn, consider the environmental impact of their services.



9. ADOPTION, UPDATES AND AMENDMENTS TO THE CODE OF ETHICS

This Code of Ethics was adopted by a resolution of the Thema Optical s.r.l. Board of Directors on 06/04/2022 with immediate effect.

The company undertakes to inform all recipients of the principles of the Code of Ethics using effective and appropriate means.

All updates, amendments and additions to this Code of Ethics constitute a guarantee of its effectiveness and its correspondence to the changes and developments of the context in which it acts as a guide.

Any updates and/or amendments to the Code which are deemed necessary shall be approved by the Board of Directors.

10. VIOLATION OF THE CODE OF ETHICS AND DISCIPLINARY ACTION

This Code of Ethics constitutes an integral part of the contractual obligations of the directors and employees of Thema, whether they work in Italy or in its foreign branches.

Violation or non-compliance by recipients with even part of this Code of Ethics shall constitute a contractual breach and an ethical disciplinary offence and disciplinary action shall be taken which is proportionate to the gravity or recidivism of the conduct. This action may also lead to a request for compensation for any material damages or damage to the company's image, always in accordance with the provisions of applicable work contracts and any other regulations protecting workers which are applicable in the country in question.

Failure to comply with all or part of the Code of Ethics by recipients who are not company employees (consultants, suppliers, partners etc.) shall constitute sufficient grounds for the termination of the working relationship with Thema.

11. REPORTING VIOLATIONS

Any recipient who becomes aware of a breach of the Code of Ethics must report it immediately to the C.E.O..

Violations may be reported in writing, even anonymously, to: Thema Optical srl, Via Risorgimento 100, 32040 Domegge di Cadore (BL), addressed to the C.E.O. or to the dedicated email address: codiceeticogarante@thema-optical.com.

The C.E.O. shall ensure the person reporting the violation is protected against any form of retaliation, discrimination or penalisation and that their identity shall remain confidential (except if legal obligations require otherwise).



BY POST

Thema Optical srl, Via
Risorgimento 100, 32040
Domegge di Cadore (BL)
For the attention of the C.E.O.



EMAIL

codiceeticogarante@thema-optical.com



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VALLEY

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CHOOSING THEMA MEANS
MEETING THE NEEDS OF TODAY'S GENERATION
WITHOUT COMPROMISING THOSE OF FUTURE GENERATIONS

Thema - A family factory

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thema-optical.com