

# CODE OF ETHICS



# SCARPA

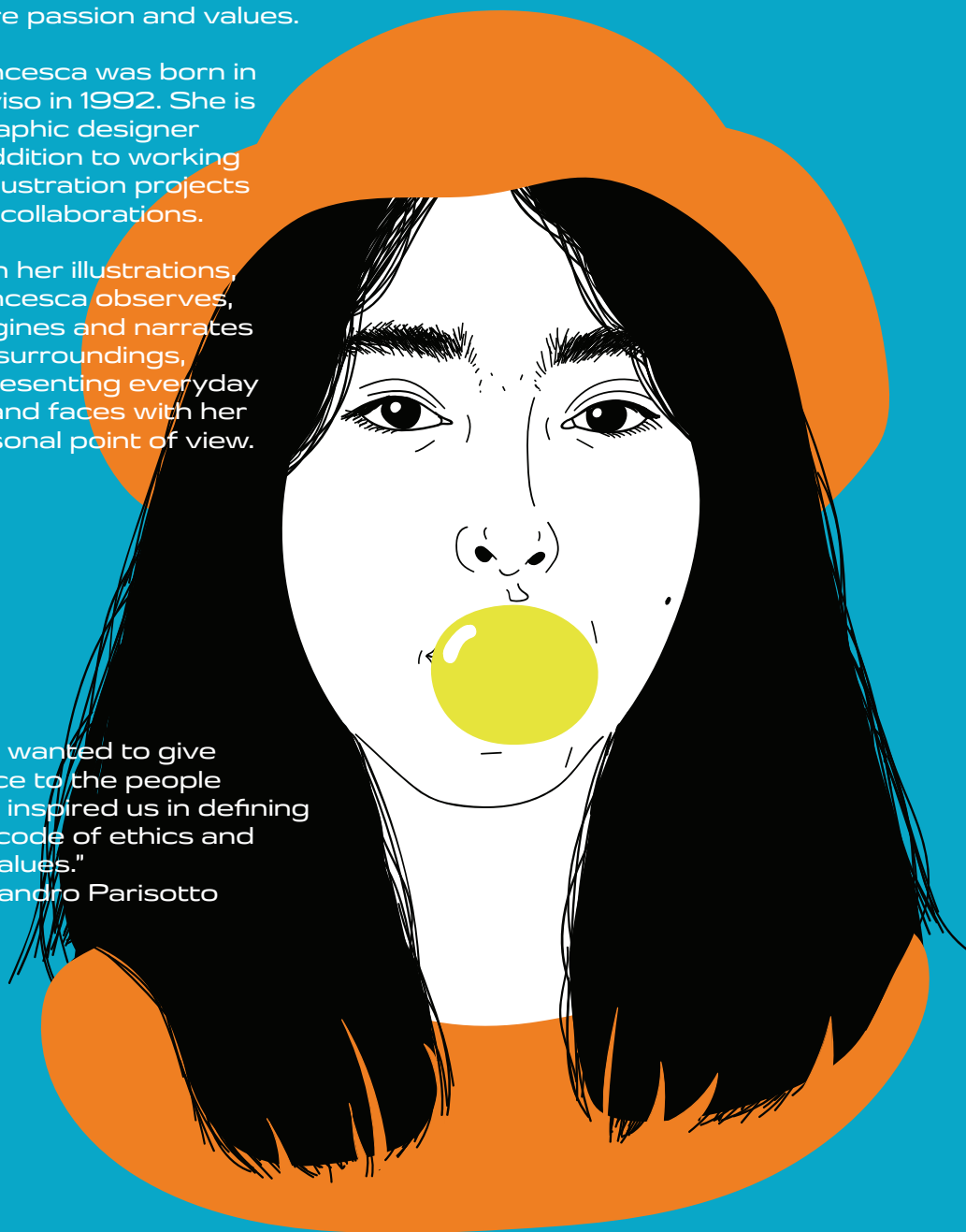
With her pencil, Francesca Cancian has illustrated for **SCARPA** the ordinary people with whom we share passion and values.

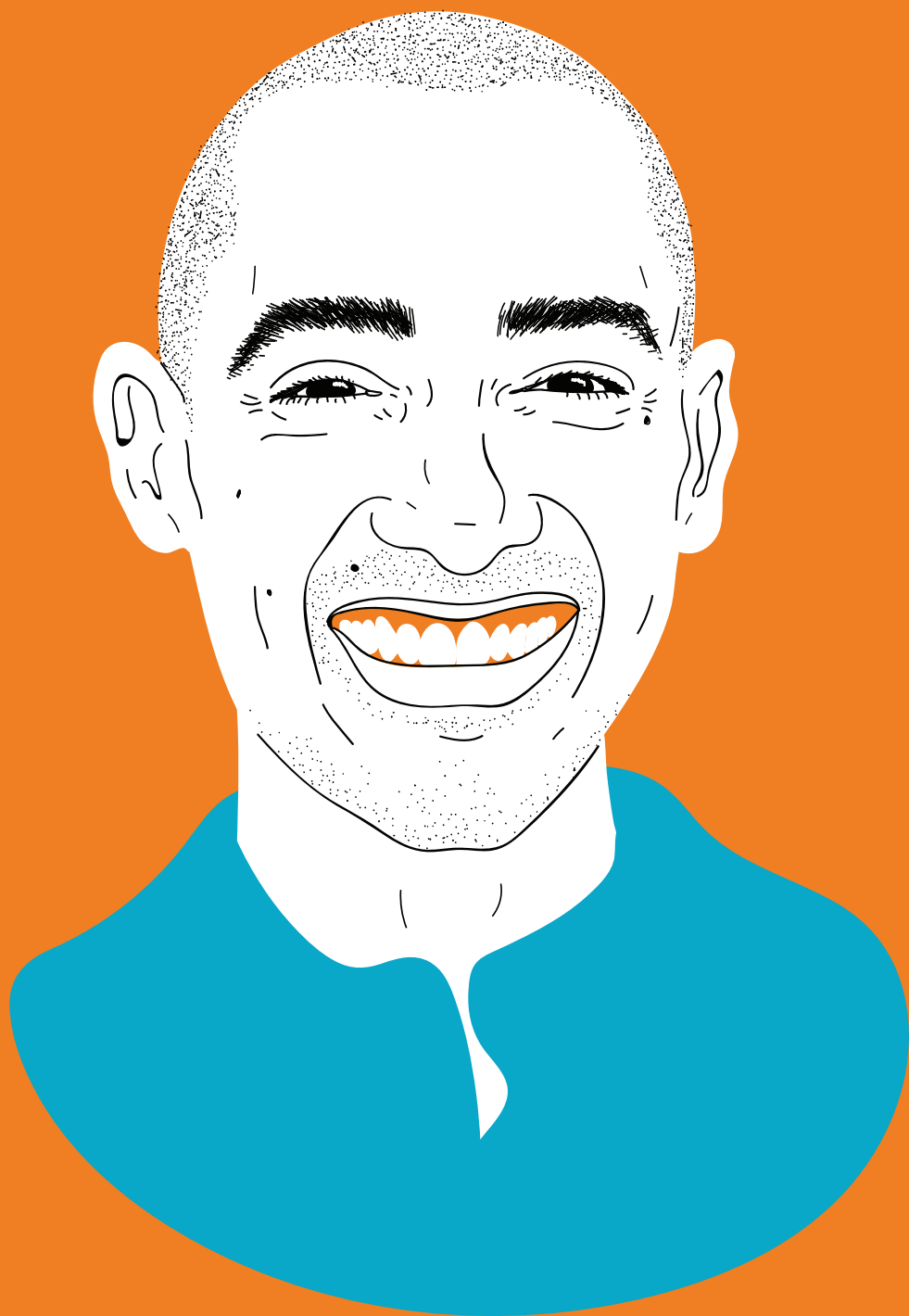
Francesca was born in Treviso in 1992. She is a graphic designer in addition to working on illustration projects and collaborations.

With her illustrations, Francesca observes, imagines and narrates her surroundings, representing everyday life and faces with her personal point of view.

"We wanted to give a face to the people who inspired us in defining our code of ethics and its values."

— Sandro Parisotto





**Contents**

5	Introduction
6	Value and philosophy
9	Addressees and general principles
10	Human capital
13	Environmental protection
14	Supplier relations
17	Customer relations
18	Relations with the market
20	Relations with the Judicial Authority
21	Corruption
23	Donations and sponsorships
24	Implementation of the code and sanctions
25	Final provisions

# Introduction

Calzaturificio **S.C.A.R.P.A.** S.p.A. (hereinafter also "**SCARPA**"), together with its subsidiaries/ associated companies forms the "**SCARPA** Group". This Code of Ethics is the official document that has been prepared to outline and convey the vision, mission, value, philosophy and fundamental ethical principles on which the **SCARPA** Group bases its business conduct and corporate activities.

# Value and philosophy

**SCARPA** bases its company strategy on research into innovative technical solutions and does not limit itself to merely developing ideas, but also directly manages manufacturing. The way in which it undertakes to do this outlines the company's transition to corporate sustainability: it is not enough to do business in the traditional ways, the ethical constraint of sustainability is necessary, i.e. respect for the environment, people and communities.

The corporate mission of **SCARPA** is:

We design and sustainably manufacture increasingly innovative footwear to reach every summit.

It is based on the values on which it has built its success:

- **S**ustainability
- **C**are
- **A**ir
- **R**espect
- **P**erformance
- **A**uthenticity

**SCARPA** believes that the key to sustainable, long-lasting development necessitates the application of ethical principals focused on caring for people, solidarity, environmental sustainability, interdependence and transparency.

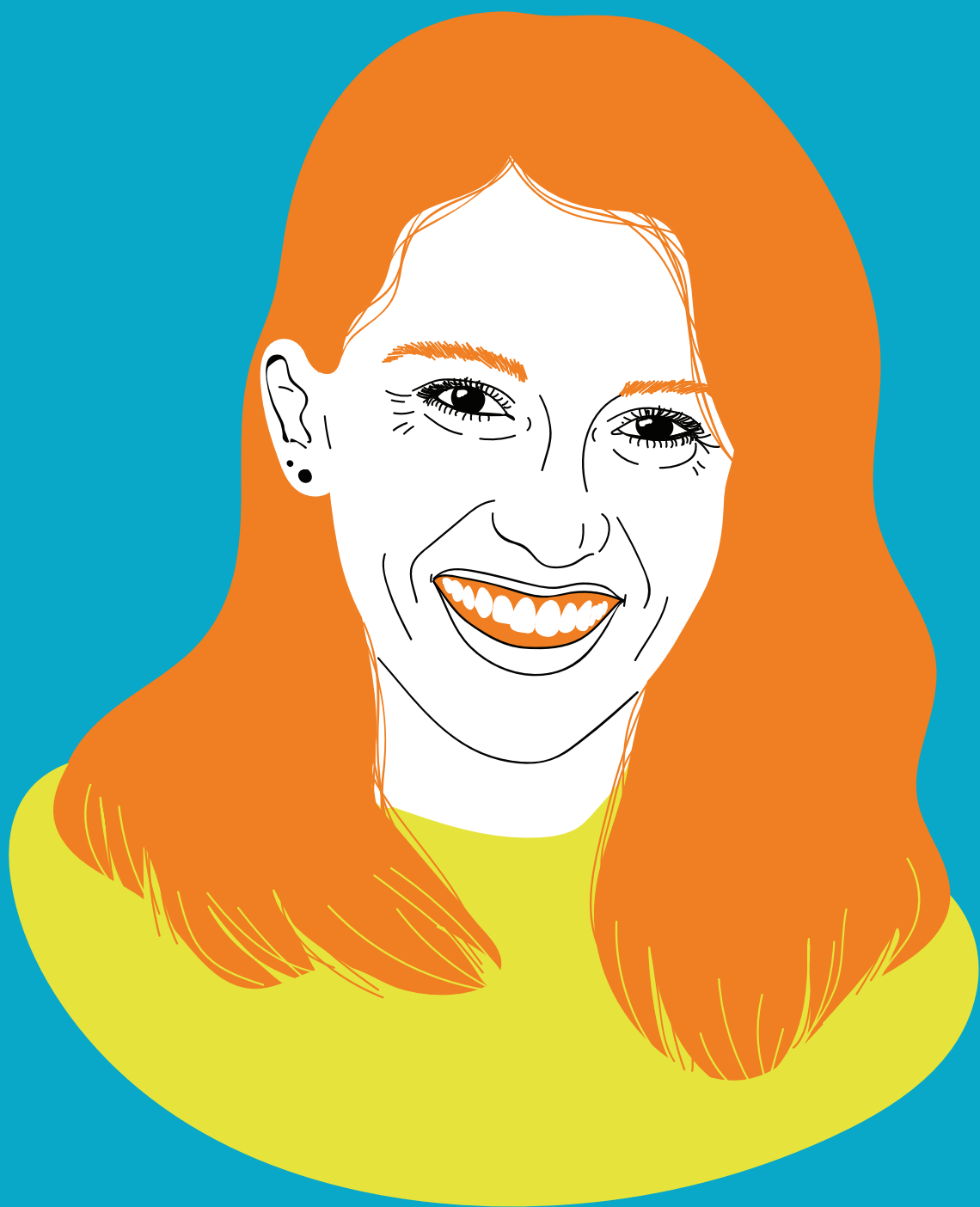
Just as is guaranteed the unparalleled quality of its products, **SCARPA** strives to ensure that the conduct of its employees, directors, collaborators, customers and suppliers and, in general, everyone who comes into contact with the company, complies with the company's values and philosophy, in order to guarantee fairness and reliability in the conduct of company activities.

**SCARPA** also strives to ensure that its manufacturing processes are not only high-performance and innovative, but also sustainable and respect the health and safety of workers, ecosystems and all stakeholders.

These ethical considerations also incorporate the company vision, i.e. the set of long-term objectives that the shareholders and top management wish to define for **SCARPA**:

Introducing the best technical footwear into the outdoor market, by endorsing the achievement of the satisfaction of the passionate consumer in terms of performance and durability, rather than the search for cost-cutting solutions at the expense of quality.

**SCARPA's** goal is to provide its customers with a highly-valuable product. The satisfaction of the passionate consumer becomes the driver of development and business differentiation.



# Addressees and general principles

The Code of Ethics applies to all parties in top management positions — such as administrators and auditors — to employees, suppliers, temporary workers, consultants and collaborators of any kind, distributors and, in general, everyone who enters into business with **SCARPA** during the course of their activities (hereinafter identified as the "addressees").

**SCARPA** requires meticulous compliance with current regulations and that all parties operate in accordance with this Code of Ethics, inspired by values of integrity, diligence, impartiality, fairness, transparency and moral integrity. In relations with one another, addressees are required to conduct themselves in the spirit of mutual cooperation and collaboration, avoiding any kind of discrimination and behaving in a mutually respectful manner.

# Human capital

Human dignity is a fundamental value for **SCARPA**. **SCARPA** fosters the continuous growth of its employees' technical and professional skills, welcoming, supporting, enhancing and empowering each person in their continuous growth pathway.

**SCARPA** undertakes to protect the physical and moral integrity of people, ensuring that workplaces are consistent with human dignity and compatible with having a private life and meeting fundamental needs.

The protection of the healthy working environment and the health and safety of its employees are among the Group's top priorities. Indeed, **SCARPA** is committed to promoting a culture of health and safety in the workplace, by raising awareness of risks and providing adequate resources and training, with stringent health and safety management plans, also for fires and other natural disasters. It requires that all its employees, across all levels, guarantee responsible behaviour that complies with the safety management system and all relevant company procedures in place.

**SCARPA** is firmly committed to protecting its employees' fundamental rights.

It recognises everyone's right to fair and regular pay, that is adequate in the case of overtime, with respect for people and the law. It combats the exploitation of child labour and forced labour and minors may only work in accordance with the "UN Convention on the Rights of the Child".

It requires that employees who are subject to operational limitations (e.g. due to pregnancy, maternity leave, young age, accident, disability, etc.) by adopting suitable measures to preserve their physical and moral integrity, in accordance with current legislation. It guarantees every employee the freedom of association in trade union organisations.

**SCARPA** protects inclusion and diversity within the company and explicitly prohibits all practices involving humiliation or debasement of people as such or of the role they cover, including bullying, exploitation or threats.

In order to prevent any form of discrimination, it adopts objective, transparent and verifiable merit criteria in both its employee selection and evaluation procedures, thereby guaranteeing equal opportunities for all.



# Environ— mental protection

For **SCARPA**, respect for the environment is the very foundation of coexistence.

All addresses of the Code of Ethics are required to comply with the applicable regulations on environmental protection and to adopt, where appropriate and applicable, the most stringent criteria set out in the regulations, based on international guidelines.

In order to achieve sustainable corporate development, **SCARPA** is committed to planning its activities in such a way as to guarantee the best possible balance between economic initiatives and environmental protection, thereby safeguarding the rights of present and future generations.

**SCARPA** assesses the environmental impact of all its processes and its corporate activities to minimise the effect on the air, water, soil and subsoil and the waste of natural resources and energy, with the aim of achieving high standards of environmental protection by implementing adequate management and monitoring systems.

# Supplier relations

**SCARPA** is committed to building authentic and long-lasting relationships with its suppliers. All **SCARPA**'s supplier relationships are bound to respect current labour laws in the supplier's own country and to implement the principles set out in this Code, which apply to all parties along the supply chain, including potential subcontractors.

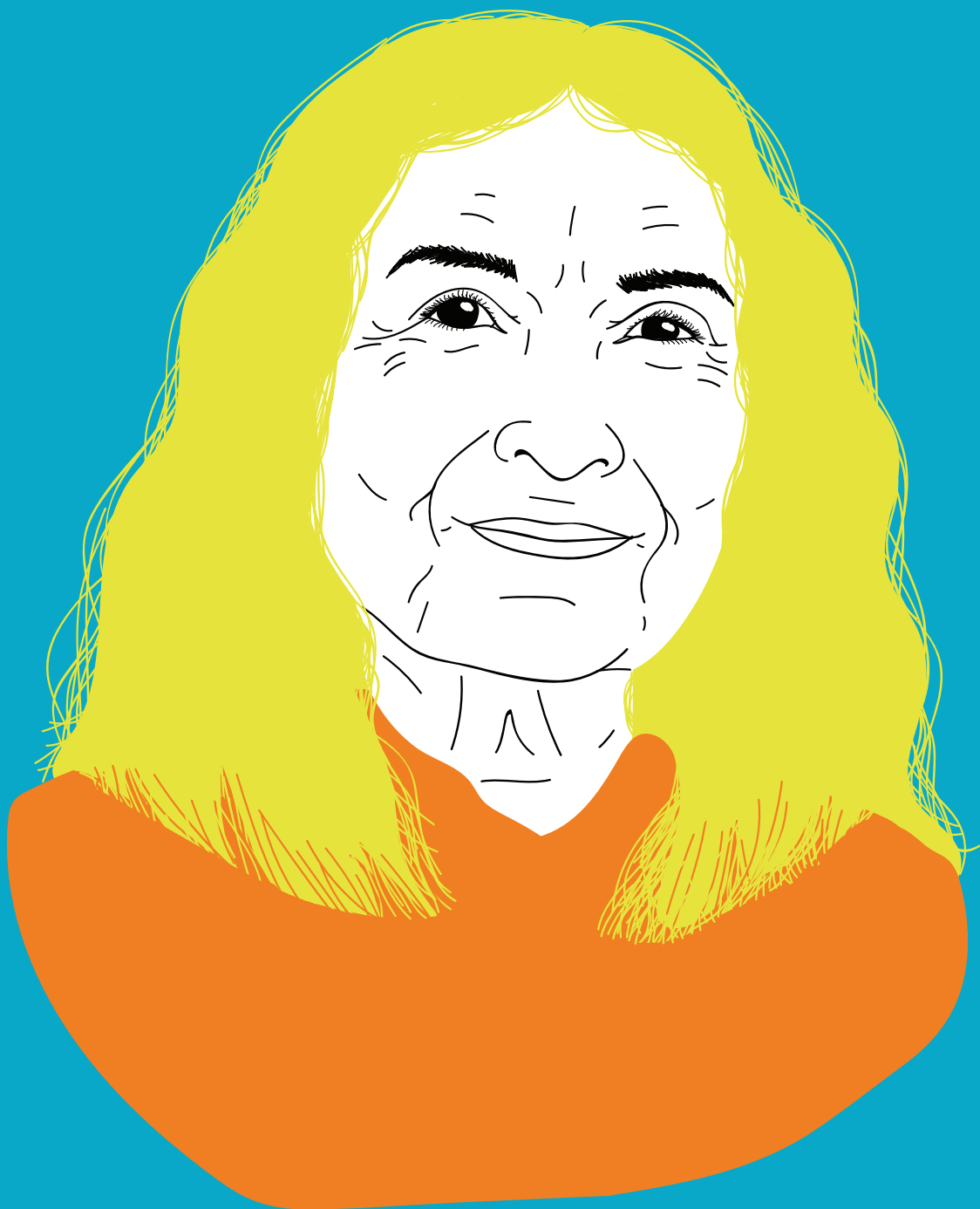
**SCARPA**'s relationship with its suppliers aims to develop close collaboration to guarantee continuous product and process innovation, thereby systematically improving environmental and social sustainability practices. Via its relationships with its suppliers, **SCARPA** strives to create a responsible model of co-evolution with all the actors within the value chain, thereby generating shared prosperity.

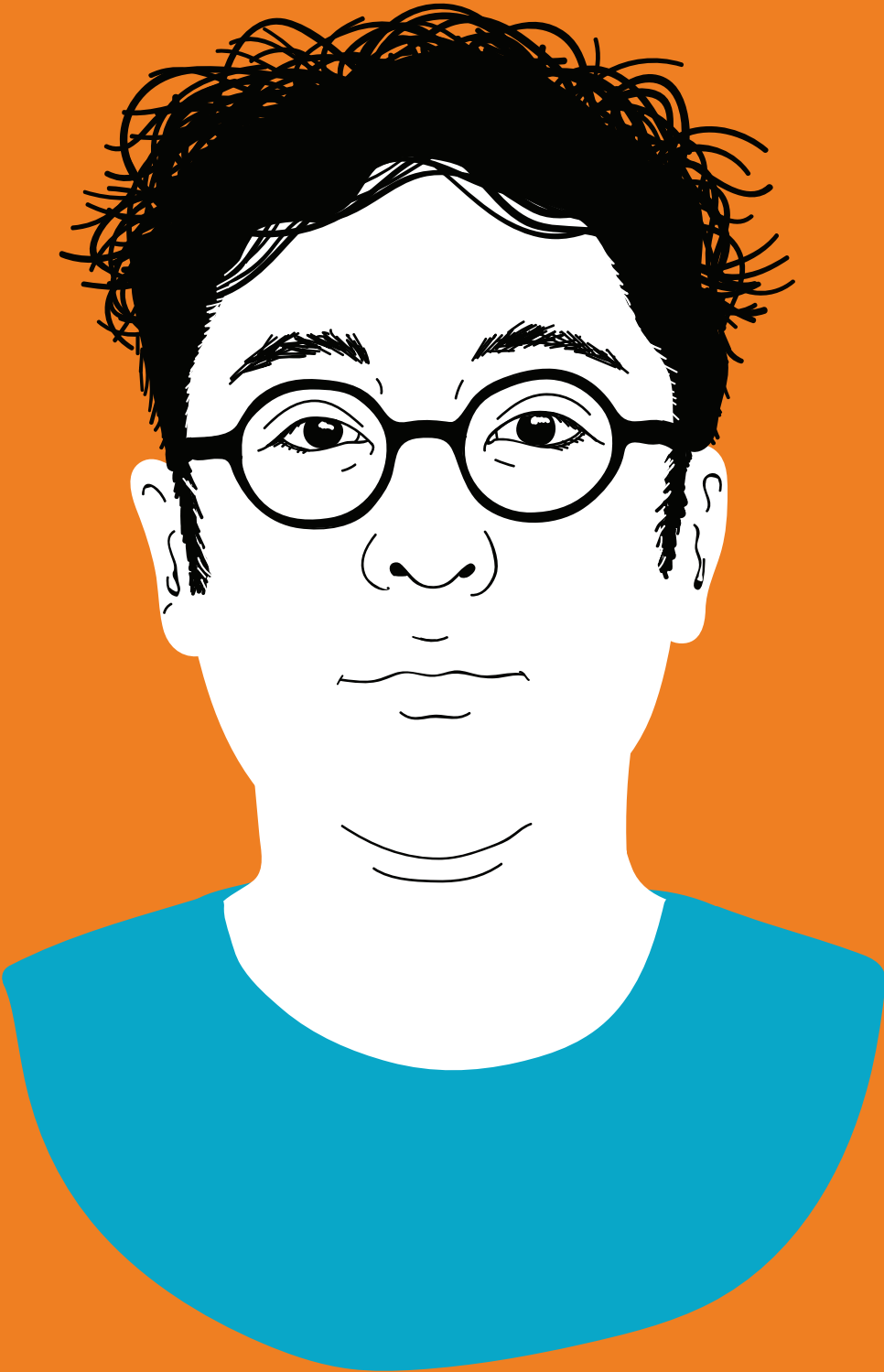
**SCARPA** chooses the various actors of the supply chain, based on the principles of performance, objectivity, quality, competence

and cost-effectiveness, as well as the principles of transparency, fairness, excellence and alignment with the highest environmental and social standards.

**SCARPA** also requires that all its suppliers guarantee respect for fundamental human rights and the principles of equal treatment and non-discrimination, as well as the prevention of child labour.

In order to guarantee the respect of these values, **SCARPA** has prepared a Code of Conduct as an integral part of the Supply Contract, which must be signed by all suppliers with whom **SCARPA** enters into an ongoing relationship. Furthermore, all suppliers, depending on the sector in which they operate, are required to sign additional contractual conditions, including quality specifications, chemical and physical tests, compliance with the RSL, the acceptance of business audits, etc.





# Customer relations

**SCARPA** works to fully satisfy the needs of its customers through its conduct that is based on respect, reliability, honesty, efficiency, durability and professionalism, aimed at guaranteeing the highest quality standards in terms of both products and services. It is a real journey, at the side of all our loyal customers who **SCARPA** has accompanied, supported and encouraged in their personal journeys towards the summit, whatever it may be.

Advertising messages and communications are based on the criteria of clarity, completeness and transparency and are designed to prevent any misleading and/or unfair practices.

# Relations with the market

**SCARPA** guarantees transparency and completeness of information towards the market. It recognises the value of fair competition as an element of market development and prohibits any kind of unfair competition, defamatory operations and abuse of positions of power by parties that operate in the same market.



# Relations with the Judicial Authority

**SCARPA** refrains from exerting any form of pressure or persuasion on subjects who are called upon to make statements to the Judicial Authorities.

# Corruption

**SCARPA** explicitly prohibits public and private corruption, illegitimate favours, collusive behaviour, pressure and solicitation for personal and career advantages for oneself or others and does not tolerate any form of personal or family favouritism.

In all its business relationships with various actors along the supply chain, **SCARPA** expressly prohibits offering or accepting benefits, gifts, acts of courtesy and hospitality, except when of a nature and value that does not affect objectivity of judgement nor could be interpreted as aimed at obtaining favourable treatment.



# Donations and sponsorships

**SCARPA** does not make direct or indirect donations to political parties, movements, committees and political and trade union organisations, nor to their representatives. Any form of involvement of the addresses in political activities takes place on a personal basis, in their own time, at their own expense and in accordance with applicable laws.

Furthermore, **SCARPA** only accepts sponsorship requests if they are useful for the development or stylistic, functional or technological innovation of its products or they aim to protect, restore or enhance the positive impact on the environment.

# Implement— tation of the code and sanctions

Our Board of Directors is responsible for implementing the Code of Ethics and developing initiatives to raise awareness and foster understanding around it. It also appoints the Ethics Committee, which monitors compliance with the same and takes appropriate measures in the event of infringement.

Any violations of the Code of Ethics can and must be promptly reported to the company using the information channels that it has made available.

All reports of breaches of the Code of Ethics are assessed by the Ethics Committee, following investigation, which may adopt sanctions.

Ascertained breaches of the Code of Ethics are considered to be serious offences, such as to lead to contract termination, in the event that such relationship is governed by a contract, in compliance with the law and the contract itself, and without prejudice to the right to compensation and the possibility of criminal proceedings being brought in the event that a criminal offence has been committed.

# Final provisions

This Code of Ethics comes into force as from when it is approved by the Board of Directors and is implemented by the entire **SCARPA** Group, including foreign companies. Any variation or addition must be approved by the same Body.

The document is available on the following website: [www.scarpa.net](http://www.scarpa.net)





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