



THE
BRAND
SHOP



Ethical Code

Date: 15/05/2024



Table Of Contents

Art. 1	Aims and sphere of application	3
Art. 2	General provisions	5
Art. 3	Integrity	8
Art. 4	Conflict of interests	10
Art. 5	Confidentiality	12
Art. 6	Relationship with third parties	14
Art. 7	Accounting transparency	16
Art. 8	Sanctions	18
Art. 9	Entry into force	20
Art.10	Environmental policy	22
Art.11	Abuse Prevention Officer	24



ART. 1

Aims and sphere
of application



Art. 1 Aims and sphere of application

This ethical code aims at reminding and setting out the main ethical values and general principles The Brand Shop is inspired by and which must be observed by all persons working in the Company in the performance of the tasks and functions entrusted to them.

We all must commit ourselves to guarantee that the activities of the Company be carried out in compliance with the law and that values such as loyalty, diligence, integrity and fairness be the mainstay of our corporate culture.

This ethical code aims at reasserting to anyone working in the Company, without distinction or exception, all the distinctive values which must permeate the activity and the relationships of The Brand Shop and which must be observed. The Code shall be applied to all the persons working with The Brand Shop, regardless of the kind of relationship they have with the same, and therefore the Administrators will have major responsibilities as they will have the burden to act showing the importance and the binding effect of the principles herewith enumerated.

ART. 2

General Provisions



Art. 2 General provisions

Firstly the management of the Company shall comply with this Code in pursuing the projects and the investments aimed at the increase of the corporate value, undertaking to safeguard the assets of the partners by using the criteria of sound and wise management. The Company recognizes the centrality of human sources as the main factor of success of any business, in a context of fairness and trust between employer and employees.

The Brand Shop offers equal work opportunities to all employees according to their specific professional qualifications and performance ability, without any discrimination as the competent offices select, employ and manage the employees according to criteria of competence and merit, without considering race, religion, sex, age, lineage, personal inabilities, length of service, respecting the rights of the person, in compliance with the laws and regulations in force, with particular attention to the current regulations concerning the employment of minors.

All personnel is employed by The Brand Shop with a regular employment contract. The work relationship is regulated by the provisions of the collective employment agreement of the sector and by the social security, tax and insurance regulations.

The Company undertakes to carry out its activity respecting the security culture also committing itself to spread and consolidate the same. The employees undertake to observe the Code as soon as they are employed and to act according to the principles of fairness, impartiality, integrity and honesty.

Acts and behaviors violating the laws or the guidelines indicated in the Code, even if in favor of the Company, are not allowed. In the event of doubts about how to proceed the employee shall report the matter to the superior competent in the matter who will have to appropriately inform the employee.

§ B

The employees must optimize their own professional knowledge, giving a contribution according to their responsibilities and acting to protect the reputation and good name of the Company.

The relationships among employees shall be such as to create a work environment based on fairness and collaboration and everyone shall act in order to maintain harmony in the relationships avoiding hostile and conflictual lines of conduct.

ART. 3

Integrity



Art. 3 Integrity

All recipients of this Code are not allowed to pursue private aims or to achieve personal benefits. The persons who are offered or receive by third parties valuable donations or gifts, not ascribable to the usual commercial courtesy, must immediately report it to their superiors.

The communication systems, the company instruments and materials, including internet connections, must be exclusively used to carry out the activities of the company. It is therefore strictly forbidden the use of the means of the company to pursue private goals or advantages and for the elaboration or spread of fraudulent, illegal, racist, indecent materials or data or however not appropriate for a professional behavior.



ART. 4

Conflict
of interest



Art. 4 Conflict of interests

The recipients undertake to prevent situations of conflict of interests with the Company, avoiding to carry out activities where the personal advantage might, even potentially, conflict with the interests of The Brand Shop.

Employees and Administrators shall abstain from pursuing economic or financial activities, personal and/or related to the married partner or the relatives within the fourth degree of affinity, in conflict or competing with those of the Company or of its partners, moreover avoiding to carry out work activities with clients or competitors of the Company.



ART. 5

Confidentiality



Art. 5 Confidentiality

The employees must keep the news and information regarding the Company learnt during the exercise of their activity confidential. In particular, the employee shall not provide any information about the organization, means of production, financial data, industrial programs and any other aspect concerning the corporate assets, the disclosure of which might damage The Brand Shop. Should third parties ask for any information concerning the Company, the recipients of this Code will be authorized to report it upon prior authorization by the executive organs.



ART. 6

Relationship
with third parties



Art. 6 Relationship with third parties

The relationships of the Company with any public or private correspondent must be led in compliance with the law, based on criteria of sound and prudent management and in accordance with the present Code. The suppliers of goods and services shall be selected according to principles of transparency, impartiality and economic viability, verifying the actual economic and professional competence and the existence of the means necessary to fulfill the activity entrusted to them. A further criterion for choice is represented by the ability of the supplier to collaborate for the achievement of the best client satisfaction in terms of quality, cost and delivery times. Anyone during the exercise of the activity noticing that a supplier is not in possession of the above mentioned requisites or knowing other suppliers capable of providing a better or more advantageous service must inform the Company for the purposes of a fulfilled joint evaluation.

With regard to the relationships with Clients, all employees shall adopt lines of conduct aimed at satisfying their rightful needs, providing, with the best attention and helpfulness, accurate and detailed information about the products, with the aim of guaranteeing an aware choice capable of consolidating the relationship.



ART. 7

Accounting
transparency



Art. 7 Accounting transparency

The recipients involved in the administrative and accounting activities shall verify that any operation or transaction be properly authorized and registered, making sure that it is lawful, profitable and proper. The transparency and truthfulness of the accounting are the unavoidable values and parameters.

The accounting transparency is based on the truth, accuracy and completeness of the documentation of any activity and of the relative accounting operations, therefore any operation must be verified with the documentation of support of the fulfilled activity, in order to perform the account records, the detailed reconstruction and the singling out of different levels of responsibility.

The use of corporate funds for unauthorized, unlawful or improper purposes is strictly forbidden. Any payment shall be made based on properly authorized operations.

ART. 8

Sanctions



Art. 8 Sanctions

The provisions contained in this Code are an integral part of the contractual obligations undertaken by the Employees and Administrators of The Brand Shop S.r.l.. The violation of the provisions of the Code shall be deemed as a breach of the contractual obligations, with all the consequences provided by law, including the termination of the contract, considering the repercussions that such a breach might have on the image, reputation and credibility of the Company. In the event of violation of the provisions of the Code by third independent parties acting, for any reason, in the interests of The Brand Shop, the employees must take all measures to suspend such lines of conducts, breaking off, if necessary, the relationship with the third party at issue.

ART. 9

Entry
into force

§ B

Art. 9 Entry into force

The present Code shall be approved by the Board of Directors and shall come into force on 1 January 2011, date on which it will be divulgated inside the Company and to all the interested third parties entering into a business relationship with the same.

The present Code will be reviewed every 24 months, and the date of the last version will be indicate on the first page.



ART. 10

Enviromental
policy



Art. 10 Environmental policy

The Brand Shop is committed to reducing the impact on the environment of its business activities. To obtain this objective:

- we comply with relevant environmental legislation of the European Union, which has some of the world's highest environmental standards.
- we dedicate resources to R&D, in order to scout and develop new products which are environment friendly (e.g. using biodegradable materials, recycled materials, wood from sustainable forests).
- we actively seek to reduce waste, with a specific focus on merchandising and product samples lifecycle.

We are aware that for promotional merchandise we rely on the good practices of our suppliers, for this

- we have environmental certificate suppliers as preferred partners.
- we provide specific environmental certificates (GOTS, FSC, OEKO-TEX standard 100) upon Client request.

Additionally, we train our staff and new employees the environmental effects of their activities, trying to identify every year the best practices on environmental issues.

ART. 11

Abuse Prevention
Officer



Art. 11 Abuse Prevention Officer

In adherence to the fundamental values of integrity, responsibility, and transparency, The Brand Shop places primary importance on the protection of human rights, business ethics, and the promotion of a safe and respectful working environment.

We recognize the importance of ensuring a work environment that fosters mutual respect and integrity in every aspect of our operations. For this reason, we have established the position of Abuse Prevention Officer, to the prevention and management of any form of abuse, harassment, discrimination, or unethical behavior within the company.

The Abuse Prevention Officer, appointed by the Board of Directors, Michele Romano, will have the responsibility to:

Surveillance and Detection: Monitor the work environment to identify any signs of abuse, harassment, discrimination, or unethical behavior.

Reporting and Investigation: Receive reports of alleged abuses or unethical behaviors, conduct investigations, and maintain confidentiality per laws and company policies.

Intervention and Resolution: Collaborate with stakeholders to address and resolve abuse or unethical behavior, protecting the well-being of individuals and the company's integrity.

Training and Awareness: Develop and implement training to raise employee awareness of abuse, harassment, discrimination, and business ethics, promoting a culture of respect and responsibility.

Reporting and Communication: Present reports to the Board on abuse prevention effectiveness and communicate with employees about the importance of adhering to ethical and behavioral standards.

Each employee can contact Michela at michele.romano@tbsagency.it for any concerns or reports.



THANKS
FOR
WATCHING.

