

We intend to comply with applicable laws and relevant technical standards.

We publicly state our commitment to the RJC Principles and Standards of Procedure and compliance with the CoC (Chain of Custody) Procedure.

We intend to assess our risks, including risks to our business arising from our business associates, by implementing systems that can manage and improve ethical standards and procedures while respecting human rights, social principles and the environment.

We are committed to disseminating our RJC Policy as widely as possible in order to raise awareness among all internal and external Stakeholders.

The policy will be displayed at the operational, commercial and administrative headquarters at 16 Palazzo Storto Street, 36060 Romano D'Ezzelino (VI) and on the Lac Spa website.

We are committed to performing and conducting our business with the utmost respect for ethical standards, ensuring integrity, transparency and compliance with applicable laws.

We will not practice bribery.

The payment of bribes or acceptance of any goods is prohibited.

We will not tolerate money laundering and/or the financing of terrorist activities.

We engage in the Know Your Customer activity.

We undertake to make full and detailed disclosure of the characteristics of the products we sell.

We undertake to take appropriate procedures in order to ensure integrity and security in product shipments.

We commit ourselves to the principles of confidentiality and protection of confidential data.

We are committed to upholding responsible conduct throughout the supply chain of its industry, ensuring that its Business Partners (Suppliers and/or Subcontractors) also observe business practices that are ethically sustainable and compliant with applicable laws and regulations, and ensuring the proper implementation of "Due Diligence for Responsible Sourcing from Conflict and High Risk Areas," in accordance with the requirements of RJC COP 2019, item 7, and the OECD Guidance.

We are committed to ensuring measures for product security within the premises and during shipments to prevent theft, damage, or replacement.

We are committed to maintaining the safety and well-being of Employees, Visitors and other relevant Business Partners.

We believe in and are committed to respecting fundamental human rights and the dignity of the individual, according to the Universal Declaration of Human Rights as enshrined in the United Nations.

We do not tolerate the use of child labor.

We pledge not to use any form of forced, bonded, indentured, or prison labor, and not to restrict the freedom of movement of employees and subordinate workers.

We are committed to high health and safety standards in our headquarters and operations.

We pledge not to discriminate on the basis of race, ethnicity, caste, country of origin, religion, disability, sex, sexual orientation, union membership, pregnancy, political affiliation, marital status, physical appearance, age, or other restriction not permitted in the workplace, so that all "Eligible for Work" persons are accorded equal opportunity without discrimination on the basis of factors unrelated to their ability to perform the intended task.

We pledge not to practice corporal punishment under any circumstances and to prohibit the use of degrading treatment, harassment, abuse, coercion or intimidation in any form.

We pledge to establish a procedure for handling disciplinary disputes with respect to conduct that is inappropriate with respect to COP and COC standards.

We undertake to comply with current legislation, with respect to working hours and pay, in the absence of such legal requirements, to adopt the prevailing industry standards.

We are committed to eliminating and where not possible reducing the use of toxic substances in manufacturing operations.

We are committed to minimizing the negative impact of our activities on the environment.

We pledge to dispose of waste responsibly.

We are committed to reducing paper, water and energy consumption.

*Romano D'Ezzelino, 01 March 2022*

*Lac Spa*

