
CODE OF ETHICS

1. Introduction

This Code of Ethics represents the foundation of Newfloor Srl's commitment to operating in an ethical, transparent, and responsible manner in all its activities. This document serves as an essential reference to guide the conduct of all those who collaborate with Newfloor Srl, both internally and externally, ensuring that the values of integrity, social responsibility, environmental respect, and transparency underpin every decision and action.

The Code of Ethics defines the moral and behavioral standards that must be observed by all members of the organization, from employees to managers, as well as suppliers, partners, and all stakeholders with whom the company interacts. It is an essential tool for safeguarding Newfloor Srl's reputation, maintaining customer trust, and contributing to a positive and safe working environment.

Purpose of the Code

The purpose of this Code of Ethics is to:

- Define and clarify the values and ethical principles that guide Newfloor Srl's actions.
- Provide clear guidance to employees and collaborators on how to manage potentially critical ethical situations.
- Promote behavior that complies with national and international laws and regulations.
- Ensure a working environment that respects human dignity, diversity, and equal opportunities.

2. Mission and Values

Newfloor Srl's mission is to provide highly innovative and high-quality raised flooring solutions, capable of meeting customers' needs for customization and sustainability. We aspire to be a benchmark in the sector, distinguishing ourselves through our ability to combine artisanal tradition with technological innovation.

The core values inspiring all of Newfloor Srl's activities include:

- **Integrity:** We operate with honesty, transparency, and fairness, both within the company and in relations with customers, suppliers, and partners. Integrity is central to our decisions and actions.
- **Responsibility:** Every individual within the company takes responsibility for their actions and their impact on people, society, and the environment.

- **Excellence:** We are committed to achieving the highest quality standards in everything we do, striving for continuous innovation and improvement of our products and processes.
- **Sustainability:** We are aware of the environmental impact of our activities and are committed to promoting sustainable practices throughout the entire value chain, from raw material sourcing to waste management.
- **Respect:** We treat everyone with dignity and consideration, valuing diversity and promoting an inclusive environment that ensures equal opportunities for all employees and collaborators.

3. Scope of Application

This Code of Ethics applies to all individuals and entities that collaborate with Newfloor Srl in any capacity, including:

- Full-time, part-time, temporary, and seasonal employees.
- External collaborators, consultants, sales representatives, and suppliers.
- Members of the Board of Directors, executives, and managers.
- Business partners, distributors, and other stakeholders.

All recipients of the Code are required to comply with its principles and provisions. Any violations of the Code of Ethics will be addressed decisively and may result in disciplinary measures, up to and including termination of employment or commercial relationships.

4. Compliance with Laws and Regulations

Newfloor Srl is committed to operating in strict compliance with the laws and regulations in force in the countries where it conducts its activities. Each employee must be familiar with and comply with the laws and regulations applicable to their role, and the company undertakes to provide the necessary support and resources to ensure regulatory compliance.

All collaborators are expected to comply with:

- Labor and workplace safety regulations.
- Environmental protection laws.
- Anti-money laundering and anti-corruption regulations.
- Regulations on the protection of personal data and confidential information.

5. Integrity and Transparency

Newfloor Srl bases its relationships with employees, customers, suppliers, and other stakeholders on the principles of integrity and transparency. In every business interaction and decision-making process, we act with honesty and fairness, avoiding behaviors that could undermine mutual trust.

Internal and External Communications

All corporate communications must be clear, truthful, and accurate. Any information provided, internally or externally, must faithfully reflect reality and comply with the company's ethical principles.

6. Conflicts of Interest

Employees and collaborators of Newfloor Srl must avoid any situation that could give rise to personal or professional conflicts of interest. A conflict of interest occurs when personal or financial motivations may influence an individual's ability to make decisions in the best interest of the company.

Examples of situations to be avoided include:

- Holding interests in competing or supplier companies.
- Accepting gifts, benefits, or favors that could influence business decisions.
- Conducting personal business during working hours or using company resources for personal purposes.

Any potential conflict of interest must be promptly reported to one's supervisor or the appropriate office to ensure maximum transparency and the adoption of appropriate corrective measures.

7. Social and Environmental Responsibility

Newfloor Srl recognizes the importance of social responsibility and is committed to promoting sustainable development, protecting the environment, and supporting local communities.

Environmental Sustainability

We are committed to:

- Minimizing the environmental impact of our production processes.
- Using environmentally friendly, recycled, and recyclable materials.
- Optimizing the use of energy and water resources.
- Managing waste and emissions responsibly and in compliance with regulations.



Newfloor Srl also promotes sustainability through collaboration with suppliers and partners who share our ecological vision and encourages innovative practices that reduce environmental impact.

Social Responsibility

The company promotes initiatives that enhance the well-being of the communities in which it operates, fostering social inclusion, education, and professional growth. Newfloor Srl also supports organizations that promote projects benefiting the wider community and is committed to ensuring dignified working conditions that respect human rights.

8. Protection of Health and Safety at Work

Employee safety is an absolute priority for Newfloor Srl. The company is committed to providing a safe working environment in compliance with all health and safety regulations, promoting a culture of prevention and raising awareness of safe behaviors among employees.

Each employee is required to comply with company safety rules and to participate in training and refresher programs on accident prevention. Newfloor Srl is committed to ensuring safe working conditions at all times and to adopting measures to minimize risks.

9. Diversity and Equal Opportunities

Newfloor Srl firmly believes in the importance of diversity as a source of enrichment and innovation. The company is committed to promoting an inclusive work environment that offers equal opportunities to all employees, regardless of gender, age, race, religion, sexual orientation, disability, or nationality.

Discriminatory behavior, harassment, or attitudes that may create a hostile work environment are not tolerated. The company encourages open dialogue and the enhancement of individual skills, promoting fair and merit-based professional development.

10. Confidentiality and Data Protection

The confidentiality of company information and personal data is fundamental for Newfloor Srl. All employees and collaborators are required to protect confidential information and sensitive data in compliance with applicable regulations, such as the General Data Protection Regulation (GDPR).

Confidential information, including that relating to customers, suppliers, and employees, must be handled with the utmost confidentiality and must not be disclosed to third parties without authorization. Furthermore, the use of confidential information for personal gain or in violation of company policies is prohibited.

11. Fight Against Corruption and Illegal Practices

Newfloor Srl has a zero-tolerance policy toward corruption and any form of illegal practice. Offering, accepting, or requesting bribes, gifts, or illicit benefits that could influence business decisions or compromise integrity is prohibited.

The company is committed to preventing money laundering, fraud, and any fraudulent behavior, actively cooperating with the competent authorities to ensure compliance with regulations and international anti-corruption standards.

12. Relations with Suppliers and Business Partners

Newfloor Srl selects its suppliers and business partners based on objective criteria of quality, integrity, and sustainability, avoiding any form of favoritism or unfair business practice. The company is committed to respecting contractual terms and managing disputes with integrity and mutual respect.

13. Violations of the Code of Ethics

Violations of Newfloor Srl's Code of Ethics are considered serious and may result in disciplinary consequences, ranging from a formal warning to termination of employment, depending on the severity of the breach.

The company encourages all employees to report any violations or unethical behavior through established internal channels, guaranteeing confidentiality and protection against retaliation.

14. Dissemination and Updating of the Code of Ethics

Newfloor Srl is committed to promoting awareness and dissemination of the Code of Ethics at all company levels. The Code is available to all employees and is regularly updated to reflect regulatory changes and new business requirements.

The company also promotes specific training activities to ensure that all employees are aware of ethical principles and the responsibilities associated with their role.

15. Final Commitment

Newfloor Srl believes that compliance with the values and principles expressed in this Code of Ethics is essential for the company's long-term success. Every employee, collaborator, and business partner is called upon to respect these standards with integrity and dedication, contributing to the strengthening of our reputation and the achievement of corporate objectives.

This Code of Ethics represents a collective commitment to excellence and ethics in every aspect of our activities, ensuring that Newfloor Srl always operates in compliance with the highest moral and professional standards.