

**Artemide**

Codice  
Etico





# Code of Ethics

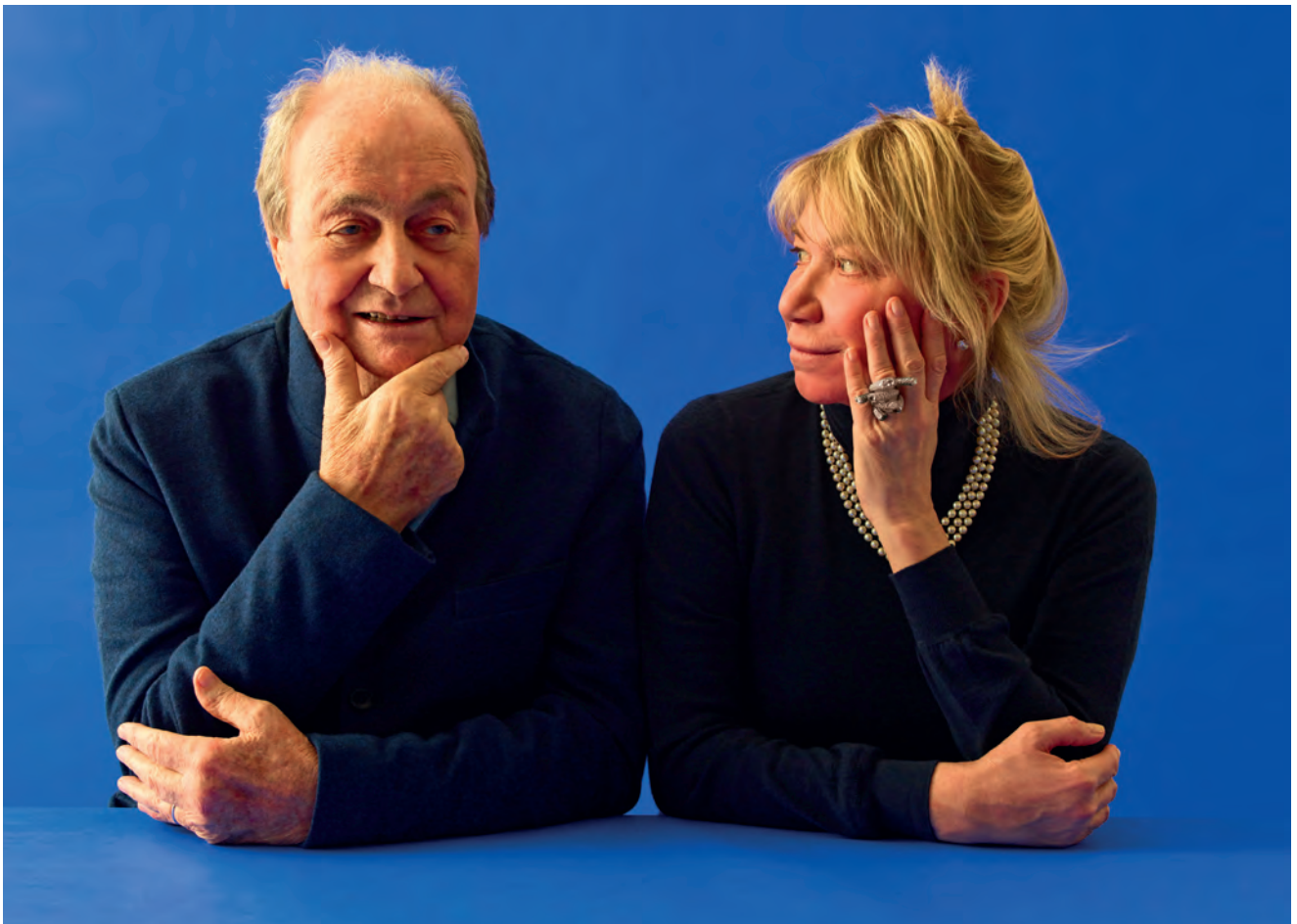
**Artemide**

# Table of contents

## Table of contents

<b>A vision towards the future</b>	<b>6</b>
<b>01 About us</b>	<b>8</b>
Scope and field of application	10
<b>02 Our values</b>	<b>12</b>
<b>03 Business Conduct</b>	<b>14</b>
Compliance with Laws and Fair Competition	14
Dealings with shareholders	15
Impartiality and diligence	15
Dealings with suppliers	15
Conclusion of supply contracts	18
Dealings with customers	20
Accounting and Taxation	20
Donations, gifts, and free samples	21
Conflicts of Interest	21
Anti-Money Laundering	22
Protection of Intellectual Property Rights and Anti-Counterfeiting	24
Corporate Assets	24
<b>04 Our People</b>	<b>26</b>
Staff Selection Process	27
Establishment of employment relationships	27
Personnel management	28
Exploitation of resources	28
Artemide personnel and contractors' obligations	29
Protection of privacy and personal integrity	29
Health and safety	30
<b>05 Dealings with external parties</b>	<b>33</b>
Sustainable growth	34
External communication	34
Dealings with organisations and associations	34
Political parties and lobbies	35
Dealings with public institutions and supervisory authorities	38
Bribery and dealings with other companies and their representatives, employees or contractors	40
<b>06 Reporting Violations of the Code of Ethics and Sanctions</b>	<b>44</b>

# A vision towards the future



Ernesto Gismondi & Carlotta de Bevilacqua  
Ph. Pierpaolo Ferrari

**2008**

PUBLICATION OF THE FIRST “CODE OF ETHICS AND CONDUCT”.

**2016**

PUBLICATION OF THE SECOND EDITION OF THE “CODE OF ETHICS”

With the publication of the Code of Ethics, Artemide wished to confirm its commitment to a role as an ethical and socially responsible company.

Our Group’s identity is historically based on that set of values that have been, over the years, pursued and protected by all of us; those same values that have allowed us to strengthen and enrich our corporate culture. The set of rules from which the values of our entrepreneurial life flow have been reinforced in our new Code of Ethics and clear indications have been provided for the prevention of misconduct.

Each individual is reminded of his or her personal responsibilities to which the effectiveness of a real application of our Code of Ethics is entrusted.

**Ernesto Gismondi**

Founder Artemide Group

**2023**

PUBLICATION OF THE THIRD EDITION OF THE “CODE OF ETHICS”

The essence of Artemide has remained consistent over the years: a commitment to looking forward and innovating, inspired by the teachings of Ernesto Gismondi. This involves embracing courage, visionary spirit, curiosity, dedication, and a solid foundation of expertise to bring the future into the present.

The principles enshrined in our Code of Ethics are among the values that guide Artemide’s outlook in planning and in doing business in a correct, transparent and attentive manner.

Our commitment is to spread “good light”.

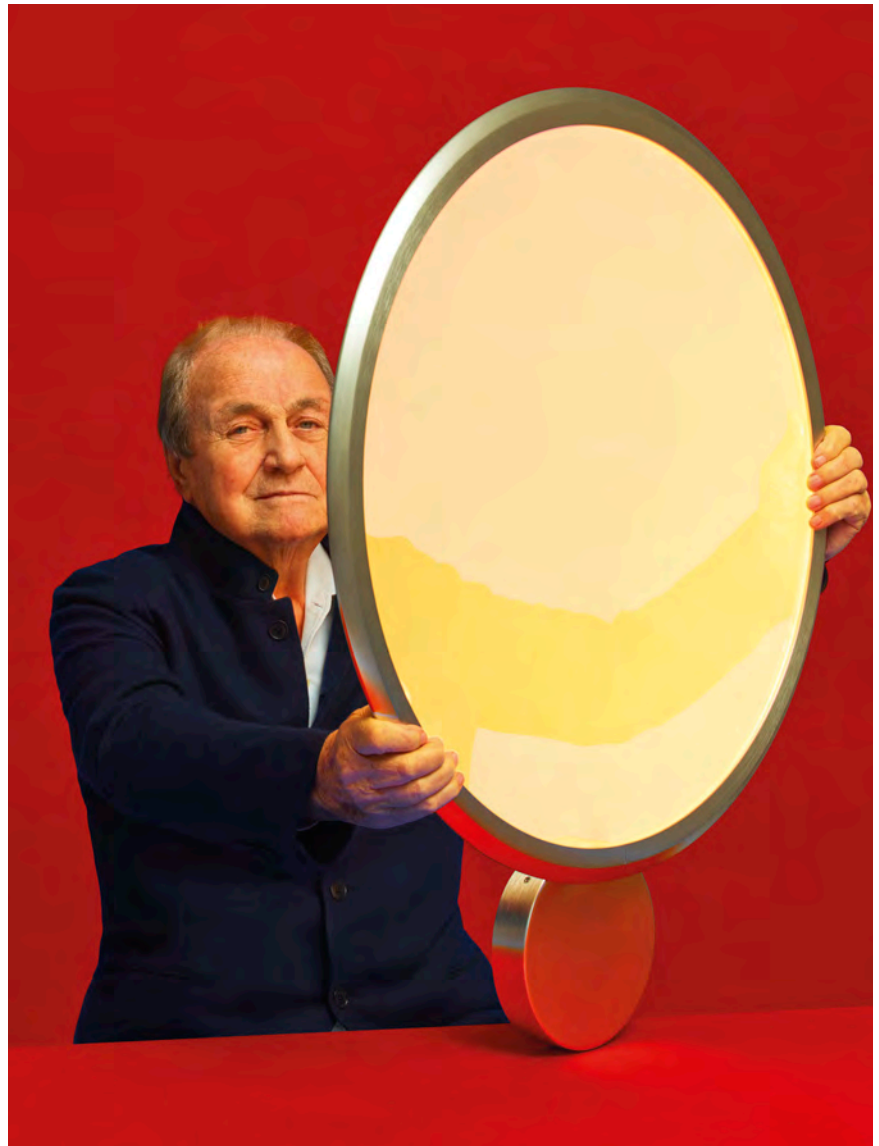
“The Human & Responsible light” contributes to a sustainable quality of life for humanity and the planet, it is inclusive and brings value by restoring not only function but also emotion and a beauty capable of educating. Sustainability and fairness criteria, a humanistic and ethical approach, scientific research, technological and manufacturing expertise result in products designed to illuminate every space with a better alternative.

**Carlotta de Bevilacqua,**

President & CEO Artemide

# Artemide group's code of ethics

The Human & Responsible Light



Ernesto Gismondi with Discovery  
Ph. Pierpaolo Ferrari



## About us

Founded in 1959 by Engineer Ernesto Gismondi, Artemide has been a leading light design company since its inception, synonymous with innovation and Italian-made products that are considered icons of contemporary design, on an international level. Based in Milan, Italy, Artemide is recognised the world over for its expertise in lighting design, with an innovative approach and products that are an expression of continual research and high quality manufacturing.

Since its inception, Artemide has been dedicated to spreading the culture of light. It believes in values that have become essential in every stage of design and production, including tradition and innovation to enhance product quality, technological research, and a commitment to social and environmental responsibility.

Technological development, dialogue with leading architects, but also investigation in the socio-cultural field are an integral part of Artemide's path at the basis of projects capable, even over time, of illuminating the future. In its quest for innovation, Artemide has partnered with renowned Italian and international universities for research. Through cutting-edge scientific and technological advancements, Artemide's philosophy of "The Human and Responsible Light" encourages a reimagining of the environment, its resources, and the energy project as part of an ecosystem, ultimately aiming for an enhanced quality of life. Artemide contributes not only to the wellbeing of places and people directly connected to it, but to the wellbeing of the community as a whole.

Artemide has embarked on a process of defining its own sustainability goals, starting with an analysis of the 17 Sustainable Development Goals (SDGs) unanimously adopted by the Member States of the United Nations in 2015, and forming part of the United Nations' 2030 Agenda for Sustainable Development.

Ensuring the achievement of the SDGs requires a collective effort to reduce inequalities, poverty, and unemployment. It involves promoting a development path that minimises negative impacts on the environment and particularly emphasises the advancement of research and innovation, decarbonisation, and the establishment of sustainable models for production and consumption.

Artemide has embarked on a solid path towards all-round sustainability, not only environmental but also social.

Over the years, this commitment has led to numerous certifications such as ISO 9001 (management system quality certification), ISO 14001 (environmental management system certification) and ISO 45001 (management system for health and safety at work certification).

In its dealings with customers, human resources and suppliers, Artemide aims to conduct itself at all times with the utmost fairness and the application of the founding ethical values of its identity.

This Code of Ethics expresses the commitments in the management of business affairs and corporate activities undertaken by the directors, employees - managers and non-managers - and Artemide Group contractors.

In addition, the Code of Ethics, in line with the indications provided on the subject by the Trade Associations and the best reference practices, defines rules of conduct aimed at preventing, in accordance with Italian law, the commission of offences as well as any conduct that is in conflict with the values that Artemide is committed to promoting.

## Scope and field of application

The provisions of the Code of Ethics are brought to the attention of and apply to all those who, directly or indirectly, permanently or occasionally, work with or for Artemide.

In particular, these provisions are addressed:

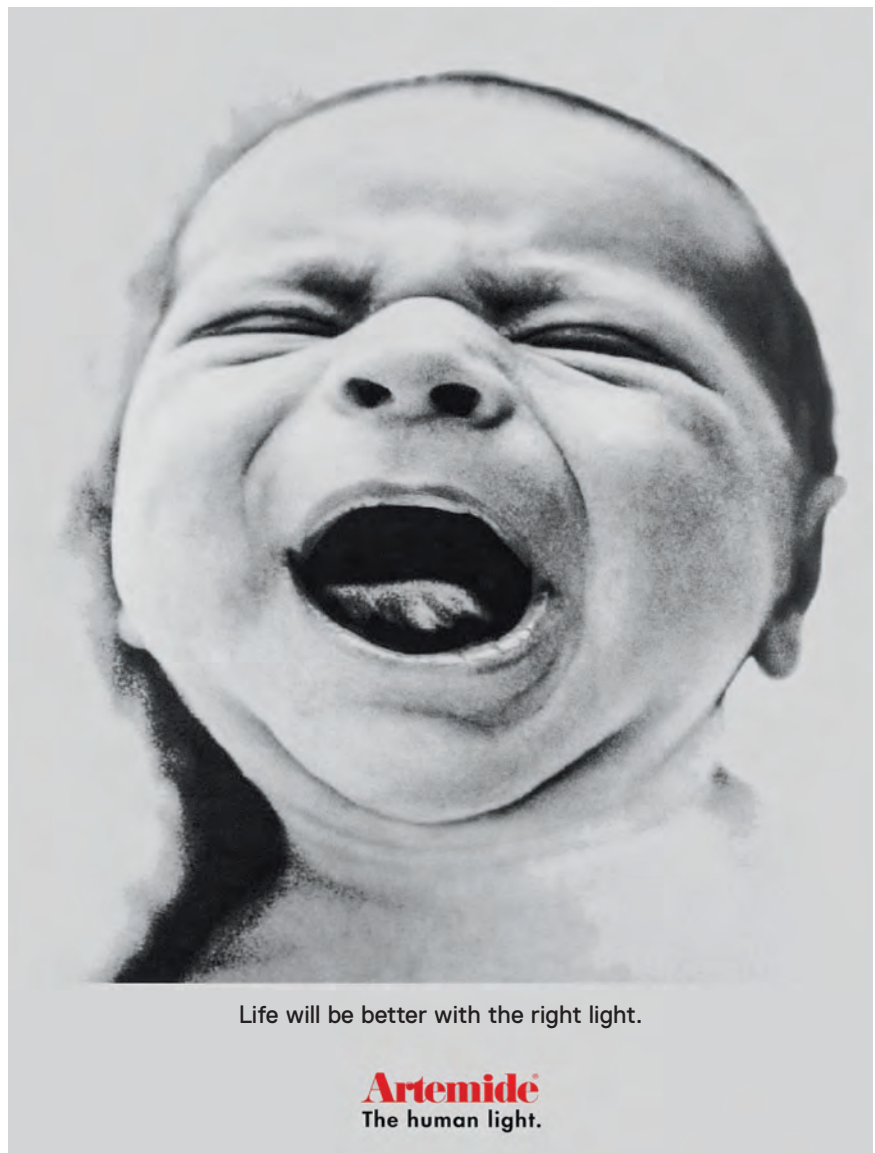
- to Artemide shareholders, directors and members of Artemide's statutory bodies;
- to all Artemide employees and contractors, even on an occasional basis;
- to consultants, suppliers, customers and business partners;
- to third parties acting on behalf of the Company.

The addressees are required to be familiar with the provisions outlined in the Code of Ethics and the relevant regulations governing the activities performed within their role, whether originating from the law or internal procedures and regulations.



## Our values

The reference values in the daily activities and in the definition of actions and strategic choices of the company are based on the utmost fairness and ethics towards customers, human resources, and suppliers.



"The Human Light" advertising campaign, 1996

Artemide's values are:

**Customer oriented**

Understanding the market within which Artemide operates and taking into account the impact that every action and behaviour has on customers. Drawing on every opportunity that arises in the interest of the customer and their needs.

**Take ownership and focus on delivering results.**

Set clear goals, personally involve yourself in shaping programmes, monitor progress, and produce tangible outcomes.

**Transparency**

Being open and honest about financial results. Being prepared to express disagreement if there is an alternative choice deemed better. Being accepting of different points of view and encouraging change. Exchanging information with each other at all levels of the organisation.

**Innovation**

Envisioning radically new solutions for products, services, and processes that can be effectively implemented. Considering current standards as the necessary but not sufficient baseline. Continuously seeking opportunities to develop existing processes and systems.

**Integration**

Being aware of how a specific behaviour fits into a broader business framework. Cooperating across and within business divisions and geographic locations towards a common goal. Increasing efficiency by containing energies and efforts through more result-oriented actions.

**Speed**

Perceiving the urgency of developing solutions that satisfy customers by anticipating market needs. Reacting quickly to development needs, effectively identifying the most appropriate solution.

**Professional Excellence**

Integrating technical and scientific know-how with a humanistic vision in order to be the first to offer an innovative perspective in each project. Working methodically, following the rules and feeling satisfaction for what you do.

# Business Conduct

## Compliance with Laws and Fair Competition

The Group's ethical principles of business conduct mirror the following fundamental international references:

- the United Nations Universal Declaration of Human Rights and the European Convention on Human Rights;
- several International Labour Organisation conventions, in particular conventions 29, 105, 138, 182 (child labour and forced labour), 155 (workers' health and safety), 111 (discrimination), 100 (equal pay), 87 and 98 (freedom of association, protection of the right to organise and collective bargaining);
- the OECD Guiding Principles for Multinational Enterprises;
- the UN Convention on the Rights of the Child;
- the 10 principles of the UN Global Compact (Global Compact) and the related Sustainable Development Goals (SDGs);
- the Paris Agreement
- UNGP (United Nations Guiding Principles on Business and Human Rights);
- the UN Principles for the Empowerment of Women.

In carrying out its activities and, in particular, in its internal and external dealings, Artemide complies with principles of legality, fairness, integrity and transparency.

The Artemide Group companies are required to comply with the law, current regulations, the Code of Ethics and internal regulations. In no case may the pursuit of the interest of one of the Artemide Group companies justify conduct that is not in line with the principle set forth above.

The Artemide Group trusts in the high quality of its products and services and in the ability and commitment of its staff members; it therefore recognises the value of free, open and fair competition and the Group companies shall refrain from unlawful agreements, harassing conduct and abuse of a dominant position.

Consequently, Artemide undertakes to compete with the operators in the market of reference, while refraining from any form of collusive behaviour or abuse of dominant position that could generate a violation of the principle of fair competition.

Artemide shall not deny, conceal or delay any information requested by the antitrust authorities and regulatory bodies in their inspection functions and shall actively cooperate in the course of investigative procedures.

## Dealings with shareholders

Shareholders need all available information in order to guide their investment decisions and corporate resolutions. The Artemide Group companies are committed to creating and maintaining the conditions for broad and informed shareholder participation in the decisions for which they are responsible.

The Artemide Group also strives to guarantee economic and financial performance such as to increase the company's value, by adequately remunerating the risk assumed by its shareholders through the investment of their capital.

## Impartiality and diligence

In their dealings with their stakeholders, the Artemide Group companies shall avoid any form of discrimination based on the age, sex, sexual habits, state of health, race, nationality, political opinions and religious beliefs of their interlocutors.

The Artemide Group companies undertake to refrain from exploiting to their own advantage any conditions of ignorance or incapacity of their interlocutors and will ensure that contracts and work assignments are carried out as knowingly and freely agreed to by the parties.

## Dealings with suppliers

The purchasing process must, simultaneously, balance the pursuit of Artemide's maximum competitive advantage, the provision of equal opportunities to each supplier, loyalty, and impartiality.

In particular, those who, in the name and on behalf of Artemide, preside over this process must operate in such a way as to:

- allow anyone who meets the predefined requirements to compete fairly in the selection/tender for supply;
- create, for each supply of a certain importance or carried out for some time with the same supplier, adequate terms of competition (for example, by considering offers and quotations from different suppliers or, if this is not possible, by verifying that the prices requested are market prices);
- make fair and impartial decisions that are in no way influenced by any form of pressure exerted by suppliers/professionals in exchange for products and/or sums of money and/or other personal benefits.

For particular types of goods or services that are relevant in terms of amount, continuity of supply or related to strategic products, in addition to the normal supplier qualification criteria, consideration must also be given to:

- the soundness of the supplier, in terms of the availability, declared and documented, of means, including financial means, organisational structures, design capacity and resources, know-how, etc.;
- the concrete existence, in cases where Artemide's specifications provide for it, of adequate company quality systems;
- the supplier's ability, where the supply includes know-how or third-party rights, to generate added value.

Artemide verifies, as far as possible, the commercial and professional reliability of new suppliers, in order to ascertain that there are no links of any kind with criminal, terrorist or mafia organisations. In some cases, the verification extends to requesting anti-mafia certificates, criminal records and/or pending charges from contractors.

Artemide recognises the central role of the entire supply chain in achieving its sustainability goals. For this reason, it promotes conscious choices aimed at selecting suppliers capable of providing concrete evidence of their commitment and adherence to the principles of environmental, social and economic sustainability.

The supplier's adherence to sustainability programmes and the integration of concrete actions aimed at guaranteeing the achievement and continual improvement of environmental, social and economic sustainability objectives into the operational processes becomes an element of primary importance when choosing a supplier.

The selection of agents and consultants must be guided by criteria and parameters of competition, fairness, cost-effectiveness, transparency, professionalism, integrity and impartiality.

Furthermore, when making a purchase (with reference to any type of supply, especially consultancy and professional appointments), Artemide staff:

- are prohibited from receiving services or making payments to contractors, consultants, or other third parties working on behalf of Artemide that are not adequately justified in the context of the contractual relationship established with them and the type of assignment to be performed;
- it is prohibited to unfairly favour contractors, consultants, or other third parties in purchasing processes insofar as they are indicated by representatives of the Public Administration;
- it is prohibited to entertain any relationship with suppliers, agents, consultants, or other third parties where one has an interest, even if not patrimonial or indirect, in the activity of the same, unless in a transparent and authorised manner in accordance with internal procedures and regulations.





Tolomeo, Michele De Lucchi and Giancarlo Fassina  
Ph. Elliott Erwitt

## Conclusion of supply contracts

With particular reference to suppliers, the conditions under which the supply is actually provided must be those contractually agreed, as well as being based on the principle of fairness of all remuneration, on the basis of objective and impartial evaluations, as well as adequate traceability of tender documentation.

The conclusion of a contract with a supplier must always be characterised by extreme clarity and must avoid any possible form of misuse. By way of example only:

- a contract, the amount of which constitutes a preponderant part of the supplier's business volume must be communicated by the latter to its contact person at Artemide and by the latter to the Managing Director of the country;
- except for special exceptions, long-term binding projects are to be avoided, short-term contracts requiring frequent renewals with price revision being preferable, as are consultancy contracts that do not bring an adequate transfer of know-how, etc...

Operationally, in order to improve the transparency and efficiency of the purchasing process, it is stipulated that:

- compatibly with organisational needs and available skills, the individuals in charge of purchasing are rotated periodically;
- the department requesting the supply and the one concluding the contract are clearly separated and belong to separate hierarchical lines;
- the entire selection, procurement and authorisation process can be easily reconstructed at any time;
- official selection/tender and contractual information and documents are kept for the periods established by the regulations in force and referred to in internal purchasing procedures.

With reference to existing relationships, anyone acting in the name and on behalf of one of the Artemide Group companies must diligently avoid taking advantage of any contractual gaps or unforeseen events in order to renegotiate the contract by exploiting the position of dependence or inferiority in which the counterparty finds itself.

Individual contracts include special clauses requiring suppliers, agents and contractors to adhere to the Group's Code of Ethics. In particular, in contracts entered into independently by Artemide with suppliers in "at risk" countries, defined as such by recognised organisations, contractual clauses are introduced which include:

- a self-certification by the supplier regarding adherence to specific social obligations (for example, measures that guarantee respect for workers' fundamental rights, the principles of equal treatment and non-discrimination, and the protection of child labour);

- the possibility of making use of monitoring measures at the supplier's production units or operating sites in order to verify compliance with these requirements.

Artemide's suppliers must also conform their activities to the principles of this Code of Ethics in their dealings with their stakeholders (e.g. employees and suppliers).

Those who have dealings with suppliers, agents, consultants, or other third parties are required to report any significant non-compliance and non-compliance with the Code of Ethics to their superiors and to the Group Internal Audit. Artemide reserves the right to terminate contractual relationships with agents, consultants, or other third parties who adopt conduct that is incompatible with the values and principles expressed in this Code of Ethics.

## Dealings with customers

The Artemide Group companies prioritise the highest possible customer satisfaction as their primary objective, along with a commitment to safeguarding their customers. They also place emphasis on addressing requests that can lead to an improvement in the quality of both products and services.

To this end, research, development, production and marketing activities are marked by the highest standards of quality. Artemide is committed to guaranteeing the achievement and maintenance of adequate quality standards for the products offered on the basis of predefined criteria.

All the Group's factories must conform to high quality standards and introduce appropriate checks at the input and output of the production process.

## Accounting and Taxation

The accounting principles adopted by Artemide are based on the criteria of truthfulness, accuracy, completeness and clarity of the records. Those to whom the Code is addressed are required to avoid any action or omission that could constitute a direct or indirect violation of the principles and internal procedures relating to the preparation and presentation of Artemide's accounting documents. In particular, they must cooperate to ensure that all transactions are recorded in a timely and correct manner in compliance with the law and applicable accounting principles. They must also ensure that transactions are duly authorised and verified when required.

They are also expected to maintain and make available supporting documentation for each transaction, thereby facilitating accurate record-keeping, traceability, chronological reconstruction and verification of the decision-making and authorisation process, ensuring full transparency and complying with relevant company procedures.

## Donations, gifts, and free samples

Gifts that may be interpreted as a means of obtaining favourable treatment for any activity connected with Artemide are not permitted. In particular, all forms of gifts to public officials, or to their family members, or to anyone who may influence impartiality and autonomy of judgement are prohibited.

The rule covers both gifts promised or offered as well as those received; by gift it is meant any type of benefit in money, in kind or in service. Any gifts offered, which are governed by the internal procedures or practices of the various Group companies, must in all cases be adequately documented, to allow for checks, and authorised in advance by the heads of departments.

Staff members who receive gifts of presumably non-reasonable value are required to notify their line manager, who will assess their appropriateness and ensure that the sender is notified in writing of Artemide's policy on the matter. In addition, Artemide rejects any action or conduct that is not explicitly permitted by law or by the Codes of Ethics of the entities with which it has a relationship.

## Conflicts of Interest

The utmost care must be taken to always avoid situations in which the parties involved in transactions are, or even only appear to be, in a conflict of interest.

This situation arises both when a staff member seeks to pursue an interest that differs from the company's mission and from the fair distribution of stakeholders' interests or to take "personal" advantage of the company's business opportunities, and when representatives of customers, suppliers or public institutions act in conflict with the fiduciary duties associated with their position.

Every Artemide staff member is required to avoid situations in which conflicts of interest may arise and to refrain from taking personal advantage of business opportunities of which they become aware while carrying out their duties.

By way of example only, the following situations may give rise to conflicts of interest:

- accepting money or benefits from individuals or companies that have or intend to enter into a business relationship with Artemide;
- holding a top management position (chief executive officer, director, department head) and having economic relationships or professional assignments with suppliers, customers, or competitors, even indirectly through family members;

- Cultivating relationships with suppliers and carrying out work on their behalf, even through a family member.

In the event of even the appearance of a conflict of interest, the staff member is required to immediately inform his/her supervisor. The staff member is also required to provide information about activities performed outside working hours, if these may appear to be in conflict of interest with Artemide.

## Anti-money laundering

Within the scope of their professional activity, the Group company staff members must not engage in conduct involving the use, transformation or concealment of capital of unlawful origin.

With reference to such conduct, it is an offence to replace or transfer money, goods or other utilities deriving from a non-culpable offence, or to carry out, with respect to such assets, other transactions so as to hinder the identification of their criminal origin.

Furthermore, specifically for Italian companies and with explicit reference to shops, show rooms or corners, it is expressly prohibited to accept cash payments in excess of the maximum threshold provided for by the Anti-Money Laundering regulations pursuant to Legislative Decree 231/2007, and to carry out transactions that are individually below the threshold, but which are artificially divided in order to elude the regulations.

ARTEMIDE: THE HUMAN & RESPONSIBLE LIGHT



## Protection of Intellectual Property Rights and Anti-Counterfeiting

One of Artemide's fundamental assets is the know-how and intellectual property rights it owns, with particular reference to trademarks, product design and specific innovative solutions in materials and components.

The Artemide Group undertakes to protect its know-how and intellectual property rights with the utmost diligence, as well as the rights of third parties for which it is a licensee. In this regard, it should be noted that in no way is it permitted to use any resources protected by the rights of others without proper authorisation or in violation of the terms of the authorisation itself. In particular, the promotion of products to customers and consumers must take place in compliance with the intellectual property rights of third parties.

Artemide expressly rejects the counterfeiting of products in general and of any intellectual work of third parties, undertaking to foster respect for legality and to oppose any initiative aimed at the production and marketing of counterfeit products.

## Corporate Assets

Every staff member is required to work to protect company assets, through responsible conduct and in line with the operating procedures drawn up to regulate their use; therefore, he/she must:

- use the entrusted assets with diligence, good judgement, and prudence.
- refrain from using assets in ways that could cause harm, reduce efficiency, or go against the company's best interests.

Each staff member is also responsible for the preservation and protection of the resources entrusted to him/her and has the duty to promptly inform the relevant departments of any threats or events that could be detrimental to the company.

Artemide reserves the right to monitor improper use of its assets through the use of appropriate tools, without prejudice to the provisions of current local regulations (privacy law, workers' statute, etc.). Artemide reserves the right to prevent and sanction improper use of its assets. In particular, each staff member is required to adopt the provisions of company policies to the letter.



When using electronic mail or company communications, each worker is required to always use professional language, in written or verbal form, that is free from content that could cause offence to the person and/or damage the company image. Additionally, they must browse internet sites diligently, adhering strictly to the corresponding internal guidelines.

With specific reference to the use of company software, it is emphasised that, as a fundamental element of the internal monitoring system, particular attention is paid to the segregation of duties in operational processes, so that no one can have unlimited powers that are free from the scrutiny of others.

To this end, the addressees are particularly required to:

- only access the IT resources to which they are authorised;
- keep credentials and passwords for access to the corporate network and to the various applications and personal keys in accordance with appropriate criteria to prevent easy identification and improper use, and to comply in this respect with corporate policies.

## Our People

The Artemide Group companies recognise the central role of human resources in the conviction that the main factor in the success of any business is the professional contribution of the people who work for it, within a context of loyalty and mutual trust.



Ernesto Gismondi with R&D team  
Ph. Elliott Erwitt

## Staff Selection Process

Recruitment of personnel in the Artemide Group is decided on the basis of the correspondence of the candidates' profiles with those expected and with the company's needs, guaranteeing equal opportunities to all those concerned.

We only ask for the information needed to evaluate the aspects outlined in the professional and psychometric profile, always respecting the candidate's privacy and opinions.

The HR department takes all necessary measures to ensure the absence of favouritism, nepotism, or patronage in the selection and hiring processes (for example, this includes avoiding situations where the selector is connected by familial ties to the candidate).

Artemide shall refrain from discriminatory conduct or conduct aimed at favouring candidates indicated by third parties, and in particular those belonging to or related to individuals in the Public Administration, or Artemide's customers.

Without prejudice to explicit agreements with the parties, Artemide shall not enter into employment or self-employment contracts with staff members of companies that perform the mandatory audit for at least 24 months following the expiration of the contract between Artemide and the same auditing firm or the end of the contractual relationship between the staff member and the auditing firm.

## Establishment of employment relationships

Personnel are hired under regular employment or collaboration contracts. Each staff member receives detailed information on:

- characteristics of the position and duties to be performed;
- regulatory and remuneration elements, as set out in national collective labour agreements and supplementary bargaining agreements;
- rules and procedures to be adopted in order to avoid possible health risks associated with the job;
- a copy of the Code of Ethics and how to find the rules of behaviour that the staff member must always abide by in carrying out his or her job and in dealing with colleagues.

This information is presented to the staff member so that the acceptance of the assignment is based on an effective understanding of all its contents.

## Personnel management

The oversight of all Artemide staff members is consistently influenced by principles of fairness and transparency, steadfastly steering clear of any form of discrimination.

Decisions made within the realm of personnel management and development processes, as well as during the selection phase, are rooted in the actual alignment between expected profiles and the profiles possessed by the staff members. Objective considerations of merit, encompassing both anticipated and recorded performances, also play a pivotal role in these decisions.

Horizontal and vertical mobility decisions are made based on an assessment of skills and capabilities. Additionally, in accordance with technical and production needs, we encourage flexibility in the organisation of work that support maternity and childcare responsibilities. The Artemide Group attaches great importance to the physical and moral integrity of its employees, to working conditions that respect individual dignity and to safe and healthy working environments. In particular, requests or threats aimed at inducing people to act against the law, the Code of Ethics, individual and personal moral beliefs or preferences are not tolerated.

Furthermore, the Artemide Group companies undertake to ensure that, in contractual dealings involving the establishment of hierarchical relationships, authority is exercised with fairness and propriety, avoiding any abuse. Each manager must request performance from his or her staff members that is in line with the execution of their duties and with the organisational needs of the company.

It is considered an abuse of authority to request, as a duty to a superior, personal services or any behaviour in violation of this Code of Ethics.

## Exploitation of resources

Line managers must employ and make the most of the professional skills of their staff members, putting in place all possible means to foster development and growth (shadowing experienced personnel, job rotation, experience aimed at covering positions of greater responsibility).

Group companies will contribute by providing information and training tools, both residential and distance learning, with the aim of developing specific skills and preserving and increasing the professional value of personnel.

## Artemide personnel and contractors' obligations

Artemide personnel and contractors shall act loyally, in compliance with the obligations assumed through the employment contract and with the provisions of the Code of Ethics, ensuring the performance required and bringing their personal contribution of ideas, proactivity and enthusiasm, which are indispensable for the harmonious and enduring development of the company.

Artemide's staff members are required to behave in a helpful, respectful and courteous manner towards all those with whom they have dealings, with a view to maintaining and developing collaborative and highly professional relationships over time.

Staff members must be aware of and comply with company policies, in particular as regards the security of information in order to guarantee its integrity, confidentiality and availability. He/she is also required to prepare his/her documents using clear, lawful and appropriate language and to allow any checks by colleagues, managers or external subjects authorised to request them.

## Protection of privacy and personal integrity

The staff member's privacy is protected in accordance with the laws in force in the various countries.

The processing of information relating to all stakeholders is carried out with full respect for the confidentiality and privacy of those concerned through specific data protection procedures, in compliance with specific rules and regulations in the various countries.

In particular, Artemide:

- ensures proper separation of roles and responsibilities;
- classifies information according to increasing degrees of criticality, adopting appropriate countermeasures at each stage of processing;
- requires third parties involved in processing to sign confidentiality agreements.

Artemide Group companies guarantee the confidentiality of the information in their possession and refrain from searching for and processing confidential data, except in the case of explicit and conscious authorisation and in compliance with the legal regulations in force. In addition to this, the Artemide Group companies are required not to use confidential information for purposes unrelated to the exercise of their professional activity.

Investigations into the views, preferences, personal tastes and, in general, the private lives of employees are not permitted.

Artemide undertakes to protect the moral integrity of their employees/contractors, and their right to working conditions that respect personal dignity. For this reason, Artemide safeguards employees from acts of psychological violence and condemns any attitude or behaviour that is discriminatory or harmful to an individual, their beliefs, and their preferences.

Any form of sexual harassment will be prosecuted and attitudes or speech that may offend, in form and/or content, the sensitivity of the person must be avoided.

Staff members who believe they have been subjected to harassment, distressed by events or behaviour, or discriminated against on grounds of age, gender, race, health, nationality, political opinions or religious beliefs, may report the incident in accordance with the provisions of the Group's Whistleblowing policy.

Differentiated opportunities are not considered discriminatory if motivated by objective criteria (for example, a professional service that requires absolute physical fitness cannot be assigned to individuals with proven physical deficiencies).

Artemide guarantees the independence and impartiality of its researchers and scientific partners, in compliance with their duties of confidentiality, which is indispensable for safeguarding the reliability of the scientific information made available within the company and to its external interlocutors.

## Health and Safety

Artemide has always been committed to promoting, disseminating and consolidating a culture of safety by developing risk awareness and the attitude of responsible behaviour on the part of all staff members. In terms of prevention, it strives to preserve the health and safety of workers and complies with the safety regulations in force in the various countries.

Artemide puts all necessary measures in place to protect the health and physical integrity of its staff, contractors and all those who find themselves in workplaces belonging to Artemide, by adopting corporate organisational models based on the continuous improvement of workplace safety.

Each Addressee is required to take the utmost care in carrying out their activities, strictly observing all safety and prevention measures, in order to avoid any possible risk for themselves, their colleagues and co-workers and the entire community.

In order to implement its safety policy in the workplace, Artemide ensures that all personnel are provided with continuous training and made aware of safety issues.

One of Artemide's primary objectives is to safeguard its human, capital, and financial resources, seeking the necessary synergies not only internally but also with those involved in its activities, including suppliers, companies, and customers.



Production unit at Pregnana Milanese  
Ph. Elliott Erwitt





# Dealings with external parties

## Sustainable growth

The Artemide Group believes in sustainable global growth in the common interest of all stakeholders and is aware of the influence its business has on economic and social development and the general wellbeing of the community.

To this end, business choices take into account respect for the environment and public health, as well as the needs of local and national communities, while supporting initiatives of scientific, cultural and social value.

In compliance with the applicable regulations, Artemide Group companies consider environmental issues in defining their choices, adopting specific technologies and production methods – where operationally and economically feasible – to reduce, even beyond the limits of the norm, the environmental impact of their activities.

In fact, Artemide's environmental policy is based on the conviction that the environment, besides being a common good to be safeguarded, can represent a competitive advantage in a market that is increasingly global and attentive to quality of life and behaviour.

In recent years, there has been an acceleration of this journey, culminating in the formalisation of a Sustainability Plan in 2022. This plan establishes tangible and measurable actions over time to reduce its impact on the environment.

Artemide actively promotes its environmental policy. It carries out in-house environmental awareness and training activities for staff members that aim to disseminate initiatives and increase employees' skills and professionalism. In its public communications, Artemide consistently highlights and champions its dedication to fostering a broad awareness and consciousness of the environment.

Artemide's lighting plays a role in bringing energy sustainability to the spaces it illuminates. High-efficiency products reduce consumption during use, while accessible management intelligences empower each user to be responsible for their own light.

## External communication

Artemide's communication to its stakeholders, including through the media, is marked by a commitment to respecting the right to information. This prohibits the dissemination of false or biased news and comments.

Communication activity, in all its forms:

- is characterised by compliance with laws, rules and practices of good professional conduct;
- is made in a clear, complete and transparent manner;
- safeguards, among others, industrial secrets;
- ensures transparency of the source;
- discloses any sponsorship arrangements.

In particular, with regard to sustainability issues, since 2019, the first year of the Sustainability Report, Artemide has been promoting clear and transparent communication of the Group's environmental performance and its products, demonstrating that it is already aligned with the Green Claim directive put forward by the European Parliament and the Council of the European Union with the aim of combating misleading or unsubstantiated claims by companies on environmental issues.

Media relationships are exclusively reserved for the relevant departments. No lobbying or attempts to improperly gain favourable views from the media are permitted.

Artemide participates in conferences, seminars, round tables and working groups and promotes maximum transparency through reports or publications related to its activities. As part of the research role, participation in conferences, courses and seminars and the publication of experimental results are an integral part of the scientific activity itself.

## Dealings with organisations and associations

Artemide believes that dialogue with bodies, associations and interested organisations is important in order to fully realise its mission. Therefore, it establishes a stable channel of communication with representative associations of its stakeholders to work with them in mutual interest, present its positions, and prevent potential conflicts.

The Artemide Group:

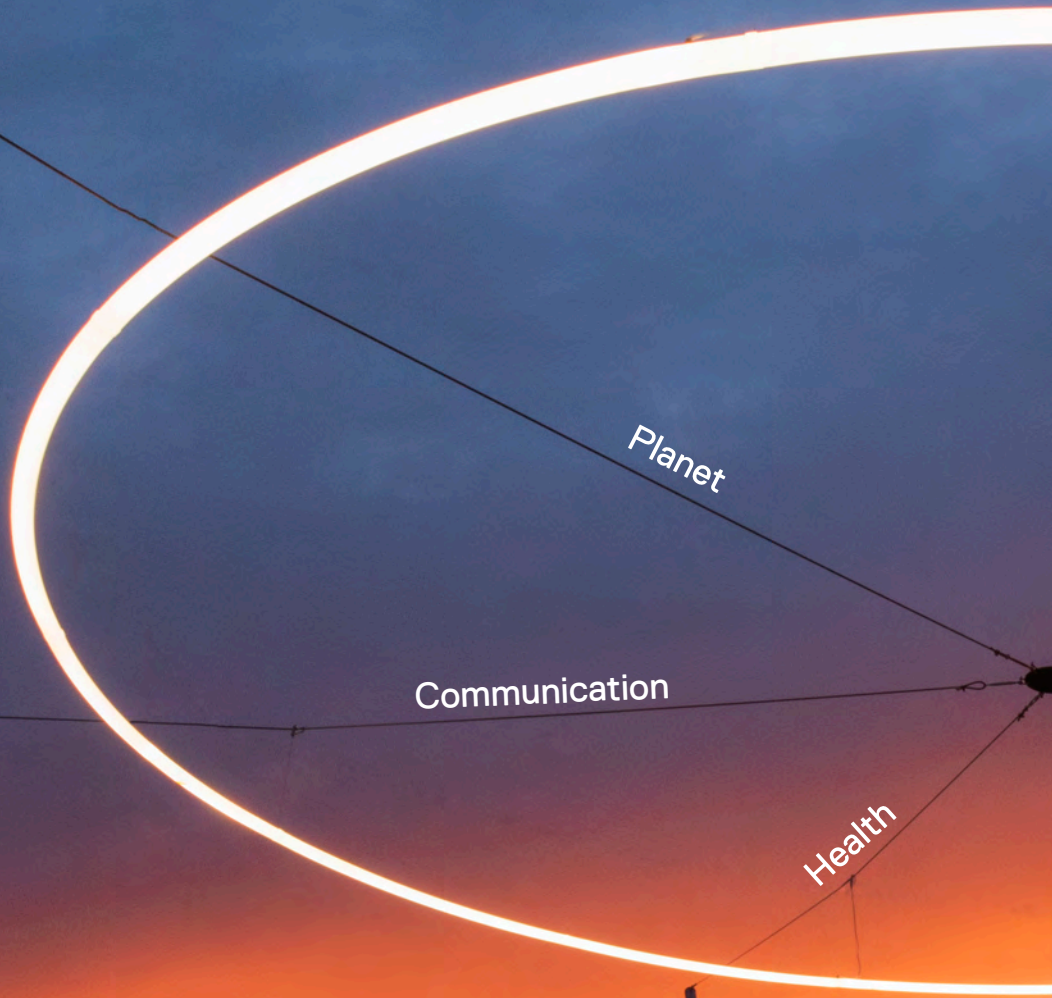
- may accept requests for contributions from non-profit organisations and associations having proper statutes and articles of association, provided they are of high cultural or charitable value and involve a significant number of citizens. Sponsorship activities may relate to social, environmental, sports, entertainment and art issues and are only intended for events that offer guarantees of quality;
- may also accept requests for contributions from scientific bodies or associations and carry out sponsorship activities for events with a high scientific value such as courses, congresses or popularisation initiatives.

In any event, in choosing the proposals to which to adhere, Artemide is careful to prevent and avoid any possible conflict of interest of a personal or corporate nature.

## **Political parties and lobbies**

Artemide is not involved in any political events in the countries in which it operates, does not finance political parties, their representatives or candidates and refrains from any inappropriate lobbying (direct or indirect) of political figures. It may, however, participate constructively in the exchange of opinions and debates that contribute to the development of European or local regulations.

Artemide undertakes to clearly express its point of view on matters of public interest and to establish open and fair relationships with business organisations, trade unions, environmental groups and other similar associations for the development of its activities.



Light is a circular energy that gives back multiple values

"The Living Chapel" Laudato Si Garden, Mario Cucinella Architects  
Porto Caleri, Rosolina, Italy

Space

Humankind

Nature



## Dealings with public institutions and supervisory authorities

Artemide maintains relationships with local, national or international institutions, which are exclusively attributable to forms of representation and protection of its interests, aimed at assessing the implications of legislative and administrative activity for the company, responding to informal requests and acts of inspection, or in any case to make its position known on issues relevant to the company.

Relationships between members of corporate bodies, employees and contractors on the one hand, and Italian or foreign public institutions on the other, must always be inspired and marked by the principles of legality, loyalty, fairness, transparency and cooperation. Any form of behaviour that may be associated with collusive activities or likely to undermine the principles expressed in this Code of Ethics is strictly rejected.

In particular, Artemide does not tolerate acts of bribery or incitement to bribery towards the Public Administration, whether committed directly by company representatives or indirectly by individuals acting on behalf or in the interest of the company, in Italy and abroad. It therefore prohibits, in the conduct of its activities, any action towards or by third parties that could damage the impartiality and autonomy of judgement of the Public Administration.

To this end, it implements all necessary measures to prevent and avoid any occurrence of bribery and other conducts, including instrumental ones, capable of constituting the risk of committing such an offence.

It is, therefore, strictly forbidden for members of the corporate bodies, employees, and contractors of the company, directly or indirectly through third parties, to make or promise money or other benefits to officials or employees of the Public Administration, whether Italian or foreign, even indirectly. This includes engaging in conduct contrary to what is stipulated in the Ethical Code and/or that could be interpreted as a promise or offer of payments, goods, gifts, or other benefits of various kinds, with the aim of unduly promoting or favouring the interests of the company or other companies within the Group.

The company allows only symbolic or modest-value gifts, associated with promotional activities or acts of courtesy, in accordance with the regulatory and ethical principles, customs, and traditions of the countries in which it operates.

It explicitly prohibits any form of pressure or persuasion exerted by public officials or equivalent individuals to create a state of psychological subjection in private individuals, leading them to act in a manner desired by those with public powers.

In particular, it is prohibited for members of corporate bodies, managers, employees and contractors directly or indirectly through third parties to:

- promise or grant money, favours or other benefits, in order to obtain the issue of concessions, licences and authorisations by the Italian or foreign Public Administration, as well as contributory, social security and welfare benefits;
- submit untrue statements or to employ schemes and deceits aimed at the unjust attainment of contributions, disbursements, or funding;
- impede or obstruct the Public Administration, whether Italian or foreign, in carrying out inspections, with the aim of avoiding the imposition of a sanction or negotiating its amount;
- engage in fraudulent, deceptive, or unfair behaviours that may mislead the Public Administration during and after public procurement procedures.

It is forbidden for members of Artemide's corporate bodies, employees and contractors to make payments, whether direct or indirect, to Public Officials and/or Public Administrations in general that cannot be linked to services or contracts duly authorised in writing by the corporate departments responsible for managing said services.

The acceptance of commitments with Public Administrations and Public Institutions is reserved to the appointed and authorised departments. Artemide rejects any conduct that may be interpreted as a promise or offer of payments, goods, gifts, compensation or other benefits of any kind in order to promote and favour its own interests and take advantage of them.

Any employee who directly or indirectly receives offers of benefits from public officials, public service officers or employees in general of the Public Administration or other Public Institutions must immediately suspend all dealings with them and report to Legal Affairs or to the Group's Internal Audit.

Artemide personnel are committed to ensuring the widest possible cooperation with the Public Administration during possible inspections by the same. In this sense, the Addressees are required to promptly provide clear, truthful and transparent information.

## Bribery and dealings with other companies and their representatives, employees or contractors

Artemide rejects any form of bribery of public or private entities and Italian or foreign companies undertake to comply with the six principles set out in the UK Bribery Act 2010 in order to avert the risk of bribery:

- Proportionality: the anti-bribery measures must be in proportion to the estimated level of bribery risk within the Group's companies and depend on the size of the company, the market scope in which the company operates, and the level of "bribery risk" that the market presents.
- Top Level Commitment: The top management of the company must be involved in the "awareness" activities at every corporate level, emphasising the company's zero-tolerance stance towards acts of bribery.
- Risk Assessment: The assessment of "bribery" risk must be carried out in line with every other risk assessment conducted within the company, referring to other "sensitive" areas such as supplier evaluation and evaluation of business partners, etc.
- Due Diligence: Procedures and written reports are designed to demonstrate the extent of evaluation conducted regarding individuals representing or acting in the interest of the company for specific business matters.
- Communication: Internal communications of all procedures and the conduct of refresher courses for all employees and contractors;
- Monitoring and Review: Continuous updates of procedures and assessments of the markets in which the company operates.

The company's dealings with other companies or consortia, whether they are (currently or potentially) customers, suppliers, competitors, business partners, counterparts in disputes, subsidiaries, whether domestic or foreign, or even private certifying bodies or mass media, are guided by the principles of legality, fairness, honesty, and transparency.

The company is committed to strengthening global anti-bribery strategies in Europe and worldwide. It dedicates maximum effort to combating bribery in both public and private domains, aligning its practices with best international and national guidelines. Any behaviour of a corrupt or collusive nature, or in any way conflicting with the principles of this Code of Ethics, whether in Italy or abroad, is strictly prohibited.

Artemide firmly believes that the key to a successful business lies in upholding both legality and ethical business practices.

The commitment to combating bribery, not only public but also private, involves all its exponents and contractors, of all ranks and levels, with particular emphasis on managers and top-level executives who personally strive to take the necessary actions to address associated risks. This commitment extends to employees, consultants, agents, or any contractors, regardless of the formalisation of the relationship with Artemide, and is clearly communicated to every business partner.





Therefore, any form of corrupt behaviour aimed at gaining or maintaining business opportunities or advantages for Artemide will not be tolerated. This anti-bribery policy is communicated and reiterated periodically to all representatives and staff, as well as to business partners. It is also the focus of a dedicated training plan.

Artemide is fully committed, as mentioned above, to embracing and promoting fair competition. Hence, any practices, whether direct or indirect, intended to induce senior executives or subordinates, including indirect representatives, consultants, or more generally, contractors of other companies, to engage in behaviours benefiting Artemide in conflict with their duties or loyalty to their own entities are strictly prohibited. This prohibition extends to behaviours deemed improper by a reasonable and impartial observer, to the detriment of the entity they belong to.

Accordingly, promises or gifts of money, objects of value or other benefits, sponsorships, gifts or donations of an unimportant or unreasonable nature, recruitment of personnel, entering into consultancy contracts, transactions, financial or corporate transactions and any other conduct aimed at unduly obtaining orders are prohibited, handouts, undue competitive advantages or any other type of benefit from third companies, to the detriment of the same, or in any case such as to be interpreted by a third and impartial observer as aimed at obtaining advantages and favours in an improper manner.

Facilitation payments, meaning payments of modest amounts intended to expedite or ensure regular services within the duties of the addressees, are also not allowed. Even if such payments align with the prevailing practices in a specific business sector or country, they are not permitted.

When permitted, entertainment expenses, gifts, sponsorships, the assignment of consultancy tasks, hirings, transactions, or any financial operations are recorded and appropriately justified and documented. This is done to enable accurate registration in the accounting records.

Artemide Group companies must adequately identify and know their business partners, and share with them a commitment to zero tolerance of bribery or collusive behaviour. They must also analyse and understand the circumstances of the countries in which they operate, in order to assess any risks or critical issues.

Artemide shall participate loyally and in compliance with this Code of Ethics, as well as with the law, in competitive procedures aimed at negotiating or entering into active contracts.

The addressees of this Code of Ethics, who become aware of a situation conflicting with the described principles and rules of conduct, are obligated to refrain from any improper behaviour. They should promptly inform their immediate superior and the Group's Internal Audit or submit an appropriate report according to the Group's Whistleblowing policy.

The addressee who refuses to participate in potential bribery, even if this refusal has negative consequences for the business, cannot face any form of punishment or discrimination.

Nor is any form of sanction or discrimination possible for those who report the existence of a practice that effectively or potentially constitutes bribery.

Artemide promptly and appropriately responds to any improper practices, which includes significant disciplinary consequences and cooperation with the authorities when necessary.

Moreover, respect for values and anti-bribery procedures is grounds for a better evaluation of employment or contracting services rendered.

Artemide periodically monitors the adequacy of its anti-bribery measures and promptly updates them when necessary.

## Reporting violations of the Code of Ethics and sanctions

Each Addressee shall report any information concerning alleged violations of the Code of Ethics to his or her direct superior. If, for justified reasons or reasons of expediency, direct reference to one's direct superior is deemed inadvisable, the report shall be made according to the methods described in the Group's Whistleblowing policy. Omitting or failing to report such circumstances constitutes a violation of this Code of Ethics.

For Italian companies, communications to the Supervisory Board (e.g. reports of alleged violations, requests for clarification, etc.) must be sent to one of the following e-mail addresses:

odvartemidegroup@artemide.com  
odvartemidespa@artemide.com  
odvartemideitalia@artemide.com

Reports may also be made anonymously, provided that they are substantiated and provide useful information for reconstructing the facts.

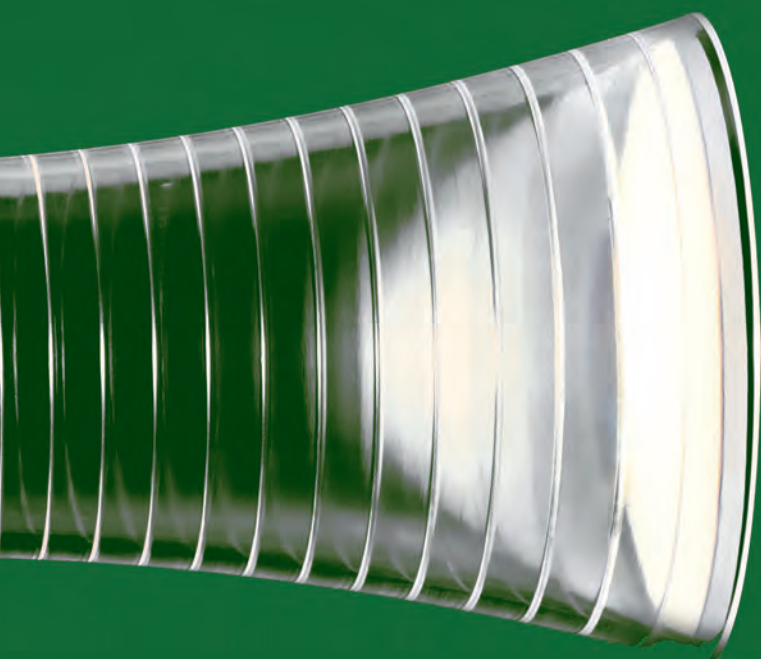
All reports will be promptly and appropriately handled, without any risk of the person submitting the report suffering any form of retaliation, even indirectly. For further details, please refer to the Group Whistleblowing policy, now published on the Artemide.com website.

The Code of Ethics is an integral part of the organisational, management, and control model. Therefore, violations of the general principles of the Code of Ethics trigger the sanctioning mechanisms aimed at compliance with the Code of Ethics. These mechanisms are provided for in the organisational, management, and monitoring models of Italian companies and are identified according to the national regulations applicable to foreign companies.

ARTEMIDE: THE HUMAN & RESPONSIBLE LIGHT







**Artemide**<sup>®</sup>  
The Human and Responsible Light







**Artemide**<sup>®</sup>  
The Human and Responsible Light