

Code Of Ethics

1. Introduction

Mondottica aims to provide clarity to all staff regarding policy obligations, entitlements, and expectations, ensuring all staff fully understand and benefit from the policy provision. We will ensure our policies are up to date, to provide you with the appropriate guidance, and in return expect you to read and comply to the guidance or rules.

Our Company Values: Integrity, Respect, Customer and Excellence underpin our policies and if you have feedback or questions on how they may be improved please contact the policy owner.

The purpose of the Code of Ethics is to explain our commitment to Environmental and Social governance issues to all those within our value chain.

Mondottica is in business to build a customer focused international fashion eyewear company that is committed to making beautiful product and bringing it to life around the world. Through our collaborations and our partnerships, we aim to bring our Brand Partners vision to life through eyewear design. Our Design philosophy marries both aesthetic appeal with flawless function, producing Eyewear that not only looks good, but feels comfortable too.

Our Eyewear reflects the DNA of our licensed brands and delivers product through multiple channels on a global scale. Our organization and the partners we collaborate with make up a culturally diverse group; we respect and take responsibility for our ethical and social obligations and take actions to ensure continuous improvement. Inherent in our aim to create well-made and beautiful eyewear for our customers to use and love for a long time, is our responsibility to make considered choices in the way we design, source and operate to influence positive change for our customers, our partners, our industry and ourselves.

Our code of ethics sets out how we support these aims, through principles to ensure fairness and high standards in the way we operate and underpinned by substantial policies and practices. Mondottica is committed to doing good business, ensuring our business activities align with the values and principles in which we believe in, and which support us in making positive change for the future. Our Company Values: Integrity, Respect, Customer and Excellence are at the heart of our Ethical Code.

In September 2021, Mondottica became a member of the UN Global Compact, further committing to incorporate, operationalize and advance the Ten Principles of the UN Global Compact within our business strategies,

Document Name	Code Of Ethics	Location	Teams - HR	Issue No	3
Author	Various	Document No:	100-PR-004GN	Page No	Page 1 of 10
Controller	Kate Box	Last Issue date	August 2022	Next Review date	August 2023

policies and ways of working. This commitment means we operate as a minimum in a way that meets the Ten Principles of the United Nations Global compact as below:

THE TEN PRINCIPLES OF THE UNITED NATIONS GLOBAL COMPACT

Human Rights

- 1** Businesses should support and respect the protection of internationally proclaimed human rights; and
- 2** Make sure that they are not complicit in human rights abuses.

Labour

- 3** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- 4** The elimination of all forms of forced and compulsory labour;
- 5** The effective abolition of child labour; and
- 6** The elimination of discrimination in respect of employment and occupation.

Environment

- 7** Businesses should support a precautionary approach to environmental challenges;
- 8** Undertake initiatives to promote greater environmental responsibility; and
- 9** Encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

- 10** Businesses should work against corruption in all its forms, including extortion and bribery.

The UN Global Compact's Ten Principles are derived from: the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

As part of the commitment to the UN Global Compact, Mondottica will report annually on its progress against these principles.

2. Scope

Mondottica continues to promote long term partnerships with its Brand partners, suppliers, partners, and employees, and as such this code of ethics is applicable to and should be adhered by:

- Mondottica Directors, legal representatives of all our group companies, management, permanent and temporary employees (whether full or part time),
- Auditors or those responsible or who play a part in or control the Articles of association.
- Consultants, contractors, volunteers, interns or those on work experience or any form of project-based staff.
- Suppliers (including subcontractors), Customers, or Partners involved in our commercial activities.

Mondottica recognise that this Code of Ethics is not designed to reflect individual country compliance or laws and we are aware of the diversity and complexity of the rules applicable in different contexts or geographies. Therefore, local legal appendices may be added where appropriate, and the Code of Ethics should not conflict with the spirit of any such rules. In the event of a contradiction being considered, please speak with the relevant director.

'Mondottica', 'We', or 'Us', will be used interchangeably within this document.

Document Name	Code Of Ethics	Location	Teams - HR	Issue No	3
Author	Various	Document No:	100-PR-004GN	Page No	Page 2 of 10
Controller	Kate Box	Last Issue date	August 2022	Next Review date	August 2023

3. General:

Our Values

CUSTOMER

RESPECT

EXCELLENCE

INTEGRITY

Our values underpin the way we do business and guide us in how we behave. We use our values to help us recruit likeminded people and help us know how to behave with each other and with other people or organizations outside of Mondottica.

Customer:

We go above and beyond in every interaction.

We communicate clearly, proactively, and thoughtfully.

We work together, across teams, to deliver for the customer.

We address issues or problems positively.

Respect:

We listen to others and understand their needs to provide solutions.

We regard others highly, understanding their contribution.

We are comfortable giving and receiving constructive feedback.

We celebrate diversity, and promote inclusion of global, cultural, and individual differences.

Document Name	Code Of Ethics	Location	Teams - HR	Issue No	3
Author	Various	Document No:	100-PR-004GN	Page No	Page 3 of 10
Controller	Kate Box	Last Issue date	August 2022	Next Review date	August 2023

Excellence:

We are ambitious to do things better as a team.

We are comfortable challenging and supporting each other to improve.

We are open to change to achieve excellence.

We recognize and reward great outcomes.

Integrity:

We deliver what we promise and are accountable to each other.

We support and trust each other.

We appropriately consult people in our decision making.

We act in good character and with positive attitude.

4. Our Code of Ethics

4.1 Observance of the law

We respect and ensure as a minimum we comply with the laws of the countries, regions, or states in which we operate: including but not limited to:

- Human rights, Local labour and employment laws and rights
- Health, safety, and the environment
- Business laws, confidentiality, intellectual property, anti-corruption, and conflict of interest.

4.2 Supporting Human Rights and Fundamental freedoms

Anti-Slavery

We have zero tolerance on and support anti-human trafficking and anti-slavery laws, abiding by local guidelines to prove identity and eligibility to work. We ban child labour and forced labour, and ensure our supply chain commit to the same. Our Modern slavery statement is reviewed and published annually and provides clarity on our specific actions, and is supported by training and communications.

Document Name	Code Of Ethics	Location	Teams - HR	Issue No	3
Author	Various	Document No:	100-PR-004GN	Page No	Page 4 of 10
Controller	Kate Box	Last Issue date	August 2022	Next Review date	August 2023

Harassment

We provide and insist upon a working environment free from all forms of harassment. Mondottica does not tolerate any sort of harassment, intimidation, bullying or humiliating behaviour, of any nature. We communicate that every individual has a responsibility not to behave in a way that could harm the dignity and rights of others. Harassment may be subject to our disciplinary procedure and penalties, and in many countries may be considered as criminal proceedings. Our Equality, Diversity & Inclusion policy provides clarity of expectations and consequences in the event of any such unacceptable behaviour and is supported by training and communication to all staff.

Discrimination

We promote and celebrate diversity and are careful to take an inclusive approach such that everyone is given the opportunity to be their best. We promote a culture of equality, which is free from any discrimination on any grounds and support and expect our brand partners, customers, and suppliers to do the same. We promote equal opportunity and fairness in all our employment principles and expect all employees and contractors to demonstrate fairness in all aspects of their work. We are committed to measuring diversity and gender parity and addressing imbalances. Our Equality, Diversity & Inclusion policy provides clarity and is supported by training and communication to all staff.

Transparency and Confidentiality

We have a fundamental obligation to communicate both internally and externally with transparency and accuracy, while respecting the need for confidentiality and judgement. This is essential for our business, and to comply with data protection and confidentiality laws. We promote a culture of transparency with our staff and partners, such that we achieve best results and resolve issues quickly. Communication with the media is only handled by authorised parties and should preserve our ethics, fairness, cultural and commercial priorities at all times whilst maintaining confidentiality.

Data Protection and Privacy

We are committed to protecting the privacy and security of personal data and information. We ensure that we collect and use personal information in accordance with the General Data Protection Regulations, whether or not they apply legally in any country in which we operate. We extend this to the processing and storage of any 3rd party information for business purposes such as business partners and confidentiality by NDA agreements. Our Privacy Policy, Data Protection Policy and Information Security policy provides more clarity, and all are supported by training and further communication with all staff.

Document Name	Code Of Ethics	Location	Teams - HR	Issue No	3
Author	Various	Document No:	100-PR-004GN	Page No	Page 5 of 10
Controller	Kate Box	Last Issue date	August 2022	Next Review date	August 2023

Conflict of Interest

We expect all employees, consultants and others working in collaboration with us, to pursue the objectives and general interests of Mondottica when carrying out their duties. This means anyone under this Code must behave and perform all activities in a way that avoid either actual or potential conflicts of interests. Conflicts of interest exist when a personal interest prevails over the Group's interest, or when a person demonstrates a professional behaviour or decision which pursues a personal benefit to them, their family or close associates which is inconsistent with Mondottica Interest.

As examples this may be when:

- A person under this code, or their family or close associates, are personally involved in supplier, competitor, or customer business.
- A person under this code uses their position for personal interest or benefit which is inconsistent with Mondottica interests.
- A person under this code uses information that they have acquired solely through their relationship with Mondottica to achieve either a personal or 3rd party benefit which is inconsistent with Mondottica interests.
- A person under this code engages in an employment or other business relationship with Mondottica suppliers, competitors, or customers, such that it conflicts with Mondottica interests.
- A person under this code executes or starts negotiations on behalf of Mondottica with relatives, shareholders, or an entity in which they are directly or indirectly involved.

Bribery and Corruption

We have a zero-tolerance approach to bribery and corruption, and work against corruption in all its forms, including extortion and bribery. Our Anti Bribery policy provides further details and clarity.

We risk assess our commercial activities and take a precautionary approach dependent on our findings. Where we accept and give gifts which are part of normal and proportionate business courtesy or relationships, we do so transparently and in line with normal commercial law and practice. The following guidelines are used, alongside any local supporting policy where local laws may differ:

- The gifts are interpreted as normal commercial or custom and practice, offered in good faith and not offered, or accepted to secure an advantage or favorable conditions for any individual or entity.
- The gifts are reasonable, appropriate, and proportionate and that records are kept recording such gifts, that are monitored by an appointed person in country or location.

Document Name	Code Of Ethics	Location	Teams - HR	Issue No	3
Author	Various	Document No:	100-PR-004GN	Page No	Page 6 of 10
Controller	Kate Box	Last Issue date	August 2022	Next Review date	August 2023

- The gifts may not influence the autonomy of anyone's judgement or lead to any advantage.
- It is understood that gifts may also include any type of benefit for example free entrance to conferences or events.
- That any gifts made to or received from public officials is prohibited.

Wrongdoing and Whistleblowing

We encourage any person under this code to be open and transparent about any concern they have, in the interests of upholding our values and finding solutions to any issues. Examples of concerns could be related to:

- criminal activity.
- miscarriages of justice.
- practices creating risk to health & safety.
- practices causing damage to the environment.
- breaches of any legal obligation.
- misinformation to public bodies.
- Financial malpractice, impropriety, or fraud
- Unethical behaviour or
- concealment of any of the above.

In the event of any concerns under this Code of Ethics, the matter should be discussed in the first instance with either the HR Director or the CEO. Further, we expect any wrongdoing to be exposed and we protect anyone who reports any wrongdoing in the public interest against unfair treatment according to any whistleblowing laws. Our Whistleblowing policy fully details our approach. Any genuine concern can be [logged confidentially here](#)

4.3 Our People

Mondottica respects and values the rights of all its employees, contractors and those employees and contractors of partners and third-party suppliers.

We make it clear and expect that all Mondottica employees and contractors have an obligation to perform their jobs with diligence and honesty, a sense of responsibility and in line with our values. We expect and promote a high value to be placed on all our staff, and all people to be treated with fairness and with good character.

We provide employees in each location with policies and guidelines for their employment and each employee is obliged to adhere to the local policy or guideline. We will not tolerate persistent negligent or deliberate failure to follow our employment policies or practices.

Document Name	Code Of Ethics	Location	Teams - HR	Issue No	3
Author	Various	Document No:	100-PR-004GN	Page No	Page 7 of 10
Controller	Kate Box	Last Issue date	August 2022	Next Review date	August 2023

We ensure those working directly for us work in a safe and secure working environment, receive at least minimum pay, and enjoy working conditions that are above adequate: with at least facilities including toilets, sanitary, food storage and preparation facilities, and rest space. We have open dialogue with our employees and respond to feedback for improvements. There are no restrictions to the freedom of association and collective bargaining.

We promote a culture where health and safety are the responsibility of everyone and assign specific responsibility for local health and safety to an appropriate person or persons who will carry out risk assessments for the jobs done and identify appropriate accountable persons in each office that we own. Our Health and Safety policy fully details our approach.

We ensure our employees and contractors are safe when they travel on Mondottica business and take travel advice from governments on risks of foreign travel.

We do not discriminate on any grounds, and we are committed to providing a workplace free from any discrimination on any grounds including (but not limited to) race, gender, religion, nationality, age, sexual orientation, disability, political belief, or any other personal trait. Our Equality, Diversity & Inclusion policy provides full detail and clarity of expectations and is supported by training and communication to all staff.

Our culture and principles provide opportunities for development, reward, and recognition such that all our staff can grow and develop. Further we provide support for wellbeing and work life balance through a range of initiatives.

4.4 Our Partners: External Relations

We base our relationships with Customers, Brand Partners, Suppliers and all stakeholders on a partnership approach, where mutual trust and respect is implied and where our values are demonstrated. We intend to operate in a commercial environment of fair competition.

Communication to our customers and the media which may or may not involve partnerships is done in a transparent and truthful manner by authorized personnel only.

We respect confidential commercial information, intellectual property rights and commercial relationships. We expect fairness in all our professional relationships and insist that all conflicts of interest are disclosed.

Document Name	Code Of Ethics	Location	Teams - HR	Issue No	3
Author	Various	Document No:	100-PR-004GN	Page No	Page 8 of 10
Controller	Kate Box	Last Issue date	August 2022	Next Review date	August 2023

4.5 Our product

Medical Device Regulations

We adhere to the Regulations, Directives and ISO standards: Regulation (EU) 2017/745 of 5 April 2017 on Medical Devices, and our Quality Management System provides full detail and clarity on the way we operate.

We ensure quality finishing standards through robust internal quality checks, with a continuous improvement cycle to deliver finishing to the highest standard.

Supplier Code of Conduct

We require our suppliers to agree to and comply with our principles and requirements set out in our Supplier Code of Conduct, and further to re-commit to our code of conduct on an annual basis.

A part of these strategies includes an annual review of our factories and our supplier code of conduct, driven by our own standards and aligned with our Brand partner requirements. Specifically, this includes quality standard certifications to an industry or government standard, depending on the supplier location, and we ensure at least one of the below certifications are in force:

SMETA: Sedex Members Ethical Trade Audit

BSCI: Business Social Compliance Initiative

WRAP: Worldwide Responsible Accredited Production (where applicable)

We insist that each of our factory's re-commits to the Mondottica Supplier code of conduct. Where necessary we carry out checking and audit procedures with our suppliers to ensure ours and our Brand partner requirements are delivered, and we do not knowingly work with suppliers who do not share our values or demonstrate these essential requirements within their own supply chain and partners.

Our Brand partnerships

We listen to, respect, and implement the requirements of each of our Brand partners in the supply of our products. These requirements can often represent the unique DNA of the Brands and we work with our Brands to ensure we agree on and drive quality and supply chain standards. We are committed to working with our Brand and Customer partners, to ensure collectively our requirements and standards evolve, with the development of new sustainable materials, and production methods which reduce wastage, and we are aspirational in what we can achieve.

Document Name	Code Of Ethics	Location	Teams - HR	Issue No	3
Author	Various	Document No:	100-PR-004GN	Page No	Page 9 of 10
Controller	Kate Box	Last Issue date	August 2022	Next Review date	August 2023

4.6 Our impact on the planet

During 2021 and 2022 we have developed knowledge and partnerships on the sustainable processes and design materials available to include in our product, packaging, and POS. This includes the use of an increased amount of bio-based and certified recycled content. We are committed to engaging with our Brand partners to drive strategy to increase the use of sustainable materials and set targets for change.

Mondottica also values and prefers suppliers with one of the following sustainability awards:

ISCC: International Sustainability and Carbon Certification
cGMP: Current Good Manufacturing Practices
Carbon Neutral Organization
Ecovadis Silver

We are committed to taking steps to reduce any negative impact of our operations on our planet, making positive impact and making improvements year on year both within our local communities and on a global scale. Our Environmental Policy gives clarity on our commitment to Carbon emission reductions within Scope 1, 2 and 3.

We observe all local laws regarding the disposal of materials and waste in the most appropriate way, and ensure all plastic packaging is made from LDPE recyclable poly bags and continue to meet relevant legislation

Our annual report on progress for the UN Global compact describes our progress each year and work is ongoing through a group of internal stakeholders engaged on 5 key areas: Product, Packaging & POS, People, Energy and Partnerships.

We are working with “Investors in the Environment” (iie) is a UK national environmental accreditation scheme designed to help organizations save time and money, reduce their impact on the environment.

We are working towards our bronze accreditation”

We expect everyone under this code to protect their environment and reduce waste and impact wherever possible.

END

Document Name	Code Of Ethics	Location	Teams - HR	Issue No	3
Author	Various	Document No:	100-PR-004GN	Page No	Page 10 of 10
Controller	Kate Box	Last Issue date	August 2022	Next Review date	August 2023