MARCOLIN

Rev.02

MARCHON, ALTAIR AND MARCOLIN CODE OF CONDUCT FOR BUSINESS PARTNERS

Data	Evento	Note
January 21, 2021	Approved by the Board of Directors of Marcolin S.p.A.	Rev. 01
November 5, 2026	Approved by the Board of Directors of Marcolin S.p.A.	Rev.02

1. Purpose and Scope

Marchon Eyewear Inc., Altair Eyewear Inc. and Marcolin Group ("**Companies**") are committed to applying specific ethical, social, environmental, legal and moral standards in the management of their business activities and encourage their business partners to uphold the same standards.

This Code of Conduct ("**Code**") defines the minimum ethical, social, environmental, and legal standards expected of all suppliers, manufacturers, subcontractors, and business partners ("**Business Partners**") involved in the production, sourcing, or delivery of goods and services. If any matter covered by this Code is also regulated by applicable laws that afford a higher level of protection, it must govern and prevail to the extent permitted by applicable law.

Compliance with this Code is a fundamental condition for the establishment and continuation of any business relationship. Business Partners are responsible for ensuring that these standards are respected throughout their own operations and cascaded to subcontractors, agents, and third-party partners.

2. Compliance with Laws and Standards

Business Partners, regardless of where they are based, must comply with all applicable local, national, and international laws and regulations, including but not limited to labor, health and safety, environmental, and competition laws.

Where local law and this Code establish different standards, Business Partners must apply the standard that provides the highest level of protection for workers, human rights, and the environment.

3. Labor and Human Rights

Companies are committed to respecting human rights across their operations and supply chain. Business Partners are expected to uphold human and labor rights and comply with applicable laws and internationally recognized standards, including by preventing violations of the fundamental rights of both national and migrant workers.

3.1 Child Labor

Business Partners must not employ or support child labor. The minimum age for employment shall be:

- 15 years of age, or
- 14 years where permitted by local law, or
- the minimum age for completion of compulsory education, whichever is higher.
- Young workers under the age of 18 must not perform hazardous work or night work and must be protected in accordance with applicable laws.

Business Partners shall ensure that interns are not required to work excessive hours that could interfere with their education or training. Assignments must be appropriate to their skills and learning goals.

3.2 Forced, Bonded, or Involuntary Labor

All work must be voluntary. Business Partners must not use or support any form of forced, bonded, indentured, prison, trafficked, or involuntary labor.

Business Partners must ensure that:

- Workers are free to terminate employment with reasonable notice
- Identity documents, passports, or work permits are not retained as a condition of employment.
- No deposits, recruitment fees, or security payments are required.

Business Partners must not engage in, facilitate, or tolerate any form of illegal, undeclared, or unregistered employment and shall ensure that all workers, including those engaged through labor agencies or other intermediaries, are employed in full compliance with applicable labor, immigration, and social security laws.

3.3 Harassment, Abuse, and Dignity

Business Partners must treat all workers with dignity and respect and actively prevent and seek to eliminate any form of intimidation, violence, harassment, coercion, or unfair or abusive disciplinary practices. The following practices are strictly prohibited:

- Corporal punishment
- Threats of violence
- Physical, sexual, psychological, or verbal harassment or abuse
- Any form of coercion or intimidation

Disciplinary procedures must be fair, documented, and communicated in a language workers understand.

3.4 Non-Discrimination

Business Partners must ensure equal opportunity and fair treatment to all workers, including local and migrant workers. Discrimination is prohibited on the basis of race, color, nationality, ethnic origin, gender, age, health, disability, religion, political opinion, sexual orientation, marital status, union membership, or any other protected characteristic, both during the hiring process and throughout employment practices, including promotions, rewards, access to training programs, termination of employment, and retirement.

Discriminatory medical testing, including pregnancy testing, is not permitted.

3.5 Freedom of Association and Collective Bargaining

Business Partners must respect workers' rights to freedom of association and collective bargaining in accordance with local law.

Where such rights are legally restricted, Business Partners must allow alternative forms of worker representation and open dialogue without fear of retaliation.

All workers are entitled to a written employment contract, in the local language, setting out the terms and conditions of employment.

4. Wages, Benefits, and Working Hours

4.1 Wages and Benefits

Business Partners must pay wages that meet or exceed legal minimum requirements and are sufficient to meet workers' basic needs and promote equal pay for work of equal value regardless of gender.

Business Partners must:

- Pay wages regularly and transparently and they should reflect the worker's level of experience, qualifications, and performance
- Provide clear wage statements
- Pay legally required premiums for overtime
- Provide all legally mandated benefits, including paid leave, maternity/parental leave, and sick leave
- Unlawful or unfair wage deductions are prohibited.

4.2 Working Conditions and Hours

Companies expect our Business Partners to ensure that employees are provided with fair and decent working conditions.

Regular working hours must not exceed 48 hours per week. Overtime must:

- Be voluntary
- Not exceed legal limits, where no such limits exist, overtime must no exceed 12 hours per week.
- Be compensated at legally required premium rates

Workers must receive at least one day off in every seven-day period .

5. Health and Safety

Business Partners must provide a safe and healthy working environment in compliance with applicable laws and international standards.

This includes:

- Safe machinery and equipment with proper safeguards compliant with applicable laws, regularly maintained, and equipped with appropriate safety lockout mechanisms. Workers must be adequately trained in their safe use.
- Facilities must be equipped with fire safety systems and emergency exits compliant with all applicable laws
- Emergency preparedness and evacuation plans regularly tested at all facilities
- Adequate lighting, ventilation, sanitation, and potable water ensured in all facilities
- Access to medical assistance and first aid
- Accident reporting and corrective action procedures.
- Where housing is provided, the same health and safety standards must apply. Workers must have the right to remove themselves from dangerous situations without fear of retaliation.
- Identification, assessment, and control of workers' exposure to chemical, biological, and physical hazards.
- inform and train workers on health and safety risks and adopt appropriate measures to identify, monitor, prevent, mitigate and stop any hazards or harmful situations affecting workers.

6. Environmental Responsibility

Business Partners must comply with all applicable environmental laws and regulations and actively work to minimize environmental impact.

Business Partners are expected to:

- Manage chemicals and hazardous materials responsibly.
- Control and handle emissions, wastewater, and waste disposal, as required by applicable laws and regulations.
- Reduce consumption of energy, water, and raw materials, ensuring responsible waste management and responsible sourcing throughout their daily operations.
- Promote and implement recycling, reuse, and sustainable practices.
- Comply with all applicable laws and regulations relating to the prohibition or restriction of specific substances
- Make available, where required, information concerning the raw materials used and the methods for the disposal of the products utilized, in accordance with applicable laws and regulations.

- Environmental responsibility is considered integral to product quality and operational excellence
- Where applicable, products and packaging shall be designed to reduce environmental impact in compliance with applicable laws.

7. Privacy, Cybersecurity and Confidentiality

Business Partners must comply with all applicable laws and regulations concerning data protection, privacy, cybersecurity and information security. Business Partners must implement appropriate measures to protect personal data and confidential information against unauthorized access, disclosure, alteration, loss or misuse.

Any confidential information received from Companies must be treated as strictly confidential and shall not be disclosed to third parties without Companies' prior written consent, unless required by law. Business Partners shall promptly notify Companies of any actual or suspected data breach or cybersecurity incident that may affect Companies or the information entrusted to the Supplier.

8. Intellectual property rights

Business Partners shall respect and protect intellectual property rights, including trademarks, patents, designs, copyrights, trade secrets, and other proprietary information of the Companies and third parties. Prestigious licensed brands are also part of the Companies, and we have zero tolerance for any form of counterfeiting. We expect our Business Partners take all appropriate measures to prevent and combat counterfeiting, whether in the supply of parts and materials or in the distribution of our products.

Business Partners shall not use the Companies' name, trademarks, logos, or business relationship for promotional purposes without prior written authorization and shall comply with all contractual obligations relating to intellectual property, confidentiality, and anti-counterfeiting.

9. Fair competition

Business Partners shall comply with all applicable antitrust and competition laws and conduct their business fairly and ethically, without abusing their market position or engaging in unlawful practices, including collusion, price-fixing, or other anti-competitive conduct.

10. Anti-bribery and corruption

Companies maintain a zero-tolerance approach to bribery, corruption, extortion, and influence peddling throughout their operations and supply chain. Business Partners shall not, directly or indirectly, offer, promise, facilitate, give, request, accept or receive any improper financial or other advantage to obtain or retain business, secure an improper benefit, or improperly influence any decision. This prohibition applies to monetary and non-monetary benefits, including gifts, hospitality, entertainment, donations, sponsorships, or other advantages. Business Partners shall implement reasonable measures to prevent, detect, and address

corruption risks within their operations and supply chain and shall ensure that their suppliers, subcontractors, agents, and intermediaries comply with the same principles.

11. Trade Compliance and Responsible Sourcing

Business Partners shall implement effective measures to prevent money laundering, terrorist financing, sanctions violations, and other unlawful trade practices, and shall comply with all applicable trade, customs, export control, and economic sanctions laws. They shall conduct appropriate due diligence on their supply chains, including with respect to conflict minerals and responsible sourcing requirements, maintain adequate traceability records, and provide Companies with relevant information regarding the origin, source, composition, chain of custody, and country of origin of the materials, components, and products supplied. Business Partners shall also provide all relevant information, documentation, certifications, and reasonable cooperation required for due diligence and compliance verification purposes.

12. Conflict of interest

Business Partners shall avoid, identify and appropriately manage any actual, potential or perceived conflict of interest involving their business activities and the Companies. Any such conflict must be promptly disclosed in writing to the Companies, whenever possible before entering into or renewing the business relationship.

13. Management Systems and Continuous Improvement

Business Partners must establish and maintain management systems designed to:

- Ensure compliance with this Code, applicable laws and requirements of customers and licensors relating to Business Partners' products and services
- Identify and mitigate labor, safety, and environmental risks
- Support continuous improvement

Business Partners must cooperate transparently and address identified non-conformities in a timely and effective manner.

14. Subcontracting

Subcontracting is permitted only in accordance with contractual requirements and, where applicable, with prior written approval.

Business Partners must ensure that all subcontractors comply fully with this Code and remain responsible for their performance, compliance, and corrective actions.

15. Monitoring, Audits, and Transparency

Business Partners are expected to maintain adequate internal controls, accurate records, and effective risk management processes across both their own operations and their supply chain.

Business Partners shall maintain adequate transparency and traceability throughout its supply chain and, upon request, provide information regarding the relevant suppliers, subcontractors, production sites, and sources of materials.

Business Partners shall implement appropriate due diligence and monitoring measures to identify and address any actual or potential non-compliance within its supply chain.

Business Partners must permit monitoring activities conducted by Companies or authorized third parties, including:

- Announced or unannounced on-site inspections
- Reviews of employment and compliance records
- Confidential worker interviews

Business Partners must maintain accurate and complete records demonstrating compliance with this Code and they shall provide, free of charge, all assistance reasonably required by Companies and/or its appointed third-party auditors to facilitate full and unrestricted access to information necessary to verify compliance with this Code.

Companies reserve the right to request any information it reasonably deems necessary to assess the compliance with this Code.

16. Communication of the Code

Business Partners must communicate this Code to their employees, suppliers, subcontractors, business partners and make it accessible in the local language and take reasonable measures to ensure that these entities understand, adhere to, and comply with its principles and requirements, posting in a common area, in the local language.

17. Corrective Actions and Enforcement

Non-compliance with this Code may require corrective action plans and remediation measures to be implemented within the specified timeframe by the Supplier. Failure to comply with such request may result in the suspension of orders, termination of the business relationship, or the exercise of any other remedy available under applicable contracts or law.

Violations involving child labor, forced labor, corruption, sanctions, denial of audit access, counterfeiting or failure to remediate- may result in termination of the business relationship without prior notice or an opportunity to remediate.

18. Reporting suspected violations

Any actual or suspected violations of this Code or of applicable laws must be promptly reported to Companies by Business Partners.

Business Partners are encouraged to implement internal reporting mechanisms that enable their employees and contractors to report, anonymously and confidentially and without fear of retaliation, any suspected or actual violations of this Code.

Companies' reporting systems are available to Business Partners, their employees and any other third party to report suspected or actual violations of this Code anonymously and confidentially. Companies apply a strict non-retaliation policy. In case Companies receive a substantive allegation of violation, they reserve to investigate further.

Companies' reporting systems:

Marcolin Group	Marchon Eyewear, Inc/ Altair Eyewear, Inc.
Marcolin Integrity Line accessible at the following link: https://marcolin.integrityline.com/	VSP Integriy site, accessible at the following link: https://secure.ethicspoint.com/domain/media/en/gui/66653/index.html
By regular mail adressed to: Integrity Committee - Marcolin S.p.A. Zona Industriale Villanova 4 32013 Longarone (BL) - Italy *Please indicate "Confidential" on the envelope to benefit from opportune level of confidentiality protection*.	Report concerns directly to VSP's Enterprise Ethics and Compliance Officer, Erin Neal via e-mail regulatorymanagement3@vsp.com or calling the anonymous toll-free Ethics Reporting Hotline at (877) 349-7494.