LANIFICIO Subalpino s.r.l.
Biella - Italy

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GOTS-20115

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Principles and Policy on Responsible Business Conduct

The undersigned Andrea Rosa, legal representative of the company **LANIFICIO SUBALPINO srl** , with registered office in via Roma, 1- 13854 Quaregna Cerreto -Biella- Italy, guarantees the legality of the company's activities and compliance with all applicable local, national and international laws and regulations or the criteria of the GOTS certification standard (in its latest updated version) if these are more stringent than the legislation.

The company guarantees, in particular, compliance with environmental standards and the protection of human and workers' rights, as well as the main conventions of the International Labour Organization (ILO) and the conditions set forth in relevant national collective bargaining agreements, avoiding causing, contributing to, encouraging, or supporting human rights violations through its activities.

This document sets out the ethical principles that the company undertakes to pursue in its operations and prescribes the responsible business conduct and practices that the company intends to adopt and promote among all parties involved in its business activities, directly and indirectly, in order to maintain conduct consistent with these ethical principles.

To this end, all company personnel, from management to employees and collaborators who perform functions for the company or on its behalf, whether they are employees of the company or not, are required to read this document, to adapt their behavior to that defined in this document and to act with honesty and integrity.

To the extent possible, the company undertakes to disseminate this document also among its commercial partners, inviting them and their subcontractors to adhere to the principles set out therein, suggesting correct behaviors and actions to avoid and disseminating these principles and ethical behaviors throughout the supply chain.

The company also undertakes to make this document public so that all other interested parties can have access to it.

Finally, the company undertakes to provide the necessary technical, financial, and professional resources to ensure that the objectives of this document are fully achieved.

Governance

LANIFICIO SUBALPINO srl ensures solid governance frameworks to support ethical and responsible decision-making.

This commitment is achieved through the following key points:

- **Board-Level Oversight** : The Board of Directors provides active and strategic oversight of key issues, including corporate social responsibility, sustainability, and corporate ethics, ensuring that all corporate decisions are aligned with our values and governance principles.

- **Regular Review of Policies and Practices:** Our policies, including those related to Responsible Business Conduct (RBC), are reviewed and updated regularly to ensure they reflect global best practices and meet evolving regulatory and legal requirements.

- **Risk Management:** We implement comprehensive risk management processes that include identifying, assessing, and mitigating risks related to our operations, including ethical, social, and environmental risks, to minimize any negative impacts on our operations and stakeholders.

1. PRINCIPLES AND CODE OF CONDUCT

1.1 Human and workers' rights

LANIFICIO SUBALPINO srl is committed to respecting, protecting, and promoting current legislation protecting human and workers' rights, and in particular to:

- **Do not resort to forced or compulsory labor** . No worker shall be forced to work under the threat of sanctions, force, or intimidation. Workers may voluntarily terminate their employment after reasonable notice and are not required to deposit security or identity documents with the employer or third parties. Workers are free to leave the workplace at the end of their shift and are not required to pay compensation or other costs for hiring or maintaining their position. Workers are not forced to use company-provided accommodation or transportation **.**

- **No child labor** . The company does not employ children under the age required by national laws for access to employment or the age required for compulsory schooling, and in any case under 15 years of age (or 14 years of age in the case of developing countries under ILO Convention 138). If a child under the established minimum age is employed by the company, the company will take all appropriate measures to remove the child from the workplace and ensure adequate remediation, including actively supporting access to education.

- **Protect young workers** . Young workers (under 18 years of age) are not employed at night or in conditions that compromise their health, safety, or moral integrity and/or that impair their physical, mental, spiritual, moral, or social development. Young workers do not work more than 8 hours per day or

more than the applicable national legal limit. Young workers do not work overtime and may enjoy a minimum consecutive rest period of 12 hours, in addition to their usual weekly rest days. Access to continuing education or additional educational opportunities, such as vocational or technical training, is still permitted.

- **Refrain from practicing and not tolerate discrimination, harassment, and violence** . The company does not engage in, support, or tolerate discrimination in employment, including recruitment, hiring, training opportunities, working conditions, job assignments, compensation, benefits, promotions, discipline, termination, or retirement based on sex, gender identity, age, religion, marital status, parental status, race, caste, social background, illness, disability, pregnancy, ethnic and national origin, nationality, membership in workers' organizations, including trade unions, political affiliation, sexual orientation, or any other personal characteristic. The company promotes an environment free of harassment and violence, where all individuals are treated with respect and dignity, and encourages anonymous reporting of abuse or harsh treatment. The company will treat and investigate all allegations of discrimination, violence, and harassment seriously, applying disciplinary measures, up to and including termination, to those responsible for such actions, if appropriate. The company's disciplinary procedures are written and communicated to all workers.

- **Achieving gender equality** . The company offers equal opportunities to all individuals, regardless of their gender, gender identity, and sexual orientation, in all aspects of training and professional and personal development. The company is committed to achieving gender equality through fair, just, and transparent recruitment, promotion, and compensation procedures and practices. The company protects pregnant women, mothers and their children from discrimination, dismissal, and career delays, including their health and safety, and workers with family responsibilities.

- **Respect the right to freedom of association and collective bargaining** . The Company does not interfere with, hinder, or impede the right of workers to join or form unions or workers' associations of their choice and to bargain collectively. The Company is committed to respecting collective bargaining agreements and allowing worker representatives access to the workplace to carry out their representation functions.

- **Ensure safe and healthy working conditions** . The company takes appropriate measures and implements systems to prevent accidents, injuries, and illnesses associated with or occurring during work activities, minimizing, to the extent reasonably practicable, the causes of hazards inherent in the workplace. The company provides special health and safety protection to vulnerable groups of workers, such as, but not limited to, young workers, new and expectant mothers, and persons with disabilities. The company provides adequate fire protection and ensures the strength, stability, and safety of buildings and equipment, including residential structures where applicable.

- **Recognize fair pay** . The wages and benefits the company pays for regular working hours meet, at a minimum, national legal standards or industry benchmarks, whichever is higher. In any case, wages should always be sufficient to meet basic needs and provide discretionary income. The company pays a premium for overtime work.

- **Comply with working hour regulations** . The company is committed to ensuring that working hours comply with national laws, collective bargaining agreements, and industry standards, whichever offers greater protection for workers. Workers are not required to work more than 8 hours per day or 40 hours

per week on a regular basis (excluding overtime), and are guaranteed daily and weekly rest periods. Overtime is voluntary, must not exceed 8 hours per week, and is not required on a regular basis.

- **Refrain from precarious employment contracts** . The company is committed to establishing recognized employment relationships in accordance with national legislation and international labor standards. The company refrains from employing labor-only contracts, subcontracting, home-working arrangements, apprenticeship programs without a genuine intent to impart skills or provide regular work, and excessive use of seasonal or fixed-term employment contracts, in order to evade obligations to employees under labor or social security laws and regulations arising from the regular employment relationship.

- **Ensure equal treatment of immigrant workers** . The company refrains from discriminating against immigrant workers compared to local workers. The company does not deprive immigrant workers of travel documents and provides them with a written employment contract in a language they understand with clear information on the terms and conditions of employment. If the company provides these workers with food, lodging, transportation, or other services, these must be provided at a rate no higher than the market rate.

- **Ensure equal treatment for homeworkers** . The company refrains from discriminating against homeworkers compared to those who work at the company plant. The company is committed to offering homeworkers the same protections and treatment as those who work at the company plant.

- **Protecting minorities** . The company is committed to respecting the human rights of individuals belonging to specific groups or populations at risk of particular vulnerability and for whom specific protection exists, including indigenous peoples, women, national or ethnic, religious, and linguistic minorities, children, persons with disabilities, and immigrant workers and their families.

- **Drug and Alcohol Use:** The Company strives to create and maintain a safe, healthy, and productive work environment for all its Employees. The Company recognizes that the abuse (or misuse) of alcohol, drugs, and other similar substances by Employees negatively impacts the fulfillment of work obligations and can have serious detrimental consequences for the safety, efficiency, and productivity of other Employees. The use, possession, distribution, or sale of alcohol and illicit, controlled, or non-prescribed drugs on Company premises is strictly prohibited and constitutes grounds for disciplinary action.

  The company requires all employees to contribute to respecting human rights by refraining from engaging in behavior that conflicts with company policy, monitoring any abuses that may occur within the company, immediately stopping any behavior that violates these rights, and adopting all necessary precautionary measures within their jurisdiction to prevent risks to their own health and safety and that of others, as well as accidents within the company.

1.2 Environmental Protection (Environmental and Chemical Policy)

LANIFICIO SUBALPINO srl is committed to promoting and protecting the environment in all its activities, adhering to the following key principles and objectives:

- **Compliance with environmental legislation:** Comply with all applicable national and international environmental regulations , ensuring compliance with environmental regulations and standards relevant to its sector. The company is committed to complying with applicable environmental legislation.

- **Pollution prevention:** take measures to prevent pollution , reducing minimize the environmental impact of its operations and implement technologies and practices to contain emissions, discharges and waste. The company is committed to identifying sources of greenhouse gas emissions into the atmosphere and collecting data on these emissions for monitoring. The company is also committed to identifying measures to reduce these emissions wherever possible.

- **Sustainable use of resources:** reduce waste production by promoting recycling and safe disposal practices, in line with current legislation. The Company aims to reduce the environmental impact of waste through careful management and monitoring.

- **Waste Management:** Reduce waste generation through waste minimization, reuse, recycling, and safe disposal practices, in line with regulations and best waste management practices. The company is committed to collecting data on the amount of waste generated, disposing of such waste in accordance with local and national regulations, and reducing its production by promoting reuse and recycling practices where possible. The company ensures that it does not incinerate waste on-site or dispose of waste in uncontrolled landfills.

- **Energy efficiency:** Improving the energy efficiency of processes and infrastructure by monitoring consumption, minimizing greenhouse gas emissions, and encouraging the adoption of renewable energy sources. The company is committed to collecting and monitoring energy consumption data, using renewable energy wherever possible.

- **Water Conservation:** Implement water-saving practices, ensuring responsible management of water resources. This includes reducing consumption through constant monitoring, process optimization, and safe wastewater treatment. The company is committed to collecting and monitoring water consumption data, establishing reduction targets. The company is committed to collecting data on the amount of wastewater generated by its operations and ensuring that such wastewater receives adequate treatment before entering the water stream, in order to meet the minimum requirements set by national or local laws, or by the chosen standard, if more restrictive.

- **Chemical Management:** Minimize the use of hazardous chemicals by ensuring that all chemicals used are managed, handled, and disposed of safely to protect the environment and human health. Where the company uses chemical inputs to manufacture certified products, it is committed to collecting and maintaining information on the safe management and use of such inputs so as not to cause harm to the people who use them or to the environment.

The company requires all employees to contribute to protecting the environment, ensuring that their activities have the least possible impact on the environment, using resources responsibly and with attention to consumption wherever possible, handling chemicals with the utmost care for their safe use, and avoiding their dispersion into the environment.

1.3 Consumer and customer protection

LANIFICIO SUBALPINO srl is committed to ensuring a positive and safe experience for its consumers and customers by adopting the following key principles:

- **Product Safety and Quality:** Ensuring that all products meet high safety and quality standards, minimizing any risks to consumer health and ensuring maximum satisfaction.
- **Transparency:** Providing clear and accurate information about our products, including details about raw material sourcing, manufacturing processes, and materials used. All communications with customers are transparent, allowing them to make informed decisions.

- **Customer feedback:** Establish structured mechanisms to collect, evaluate, and respond to customer feedback and complaints. The goal is to continuously improve our products and services by quickly addressing any issues reported by consumers.
- **Data Protection:** We strictly comply with data protection regulations and are committed to protecting customer privacy. All collected data is handled securely and in compliance with national and international privacy regulations.
- **Ethical Marketing:** All our marketing practices are transparent, ethical, and non-misleading. Our advertising is clear and truthful, aiming to provide an honest representation of our products.
- **Fair Pricing:** Adopting pricing policies that reflect a fair balance between customer value and fair compensation for all stakeholders in the supply chain. The goal is to ensure access to products at fair prices without compromising quality or workers' rights.

The company requires all personnel to collaborate in the creation of products and/or services that meet customer expectations and comply with applicable regulations, reporting any anomalies and refraining from providing misleading or deceptive information.

1.4 Prohibition of bribery and corruption

LANIFICIO SUBALPINO srl refrains from illegal or collusive practices and behaviors, does not make illicit payments, and does not promote attempts at corruption or favoritism. Such behavior harms the company by distorting both the rules of fair competition and the underlying rationale for decisions, thus compromising the success of company operations and causing negative impacts on both the market and society as a whole. Furthermore, such behavior could result in criminal penalties for both the company and the employees responsible for such behavior.

The company strictly prohibits all personnel from engaging in corruption in their business activities and from offering, promising, paying, requesting, or receiving bribes or other undue benefits for themselves or others, either directly or indirectly, as a reward for improper actions . Furthermore, any type of bribery or facilitation payments to public officials for the purpose of expediting routine administrative matters are prohibited.

LANIFICIO SUBALPINO srl adopts a rigorous approach to preventing and combating corruption and extortion in every aspect of its business, committing to the following principles:

Zero Tolerance: We have a zero-tolerance policy for any form of corruption and bribery. Any behavior that could compromise the integrity of our company or our business partners will be strictly pursued.

Compliance with Laws: Comply with all national and international anti-corruption and anti-bribery laws and regulations, including compliance with the specific regulations of the countries in which we operate.

Training and awareness: Regular training and awareness-raising for employees on how to identify and prevent corruption and bribery. These training programs aim to ensure that all employees are aware of their responsibilities and the associated risks.

Reporting Mechanisms: A secure and anonymous system for employees and third parties to report any suspected corruption or extortion. LANIFICIO SUBALPINO SRL guarantees that reports will be treated with the utmost confidentiality and that there will be no retaliation against those who report in good faith.

1.5 Responsible sourcing practices

LANIFICIO SUBALPINO srl is committed to preventing its own contribution to negative impacts through its procurement practices and to promoting a supply chain that is attentive and respectful of human and workers' rights and the environment. It is committed, wherever possible, to establishing stable contracts and fair supply conditions with its suppliers.

The company requires its personnel, involved in supplier selection and management, and in ordering raw materials and finished products, to comply with the supply conditions stipulated in the contract and to adopt the following principles:

- **Ethical sourcing:** that all materials and products used by our company come from responsible, ethical and sustainable sources, minimising environmental impact and respecting human and workers' rights throughout the supply chain.
- **Supplier Code of Conduct:** Implement a Supplier Code of Conduct that reflects our principles of social and environmental responsibility. This code is communicated to all suppliers and business partners, requiring them to adhere to our ethical standards, including respect for human rights, decent working conditions, and sustainable environmental practices.
- **Supply Chain Transparency:** Maintaining maximum transparency in our supply chain, providing information on the origins of materials, manufacturing processes, and the working conditions employed by our suppliers. This commitment to transparency is a fundamental part of our corporate responsibility policy.
- **Supplier Audits:** Conduct regular audits of our suppliers to verify their compliance with our ethical and environmental standards. Through periodic audits, we ensure that suppliers comply with applicable regulations and follow sustainable and responsible practices throughout their operations.

1.6 Transparency of accounting records

LANIFICIO SUBALPINO srl is committed to maintaining adequate accounting and financial reporting, in accordance with applicable laws and to ensuring the transparency and fairness necessary to instill trust in its operations through the following actions:

- **Accurate Recordkeeping:** Maintain accurate, complete, and compliant accounting records in accordance with applicable legal regulations and accounting standards. This ensures clear and transparent reporting of our financial transactions.
- **Financial Integrity:** Ensuring that financial reporting is reliable, transparent, and reflects the true state of its financial operations, fostering stakeholder trust.
- **Audit Compliance:** Fully cooperate with internal and external audits, ensuring that all recommendations aimed at improving financial management and reducing risks are implemented.

- **Fraud Prevention:** Implement rigorous systems and controls to detect and prevent fraud, abuse, or financial misconduct by taking a proactive approach to risk management.

To achieve this goal, the company requires all relevant personnel to actively collaborate to build and maintain the reliability of the company and its operations, maintaining accurate, timely, complete, correct, and understandable accounting records, prepared diligently and honestly. Recording false or misleading information and data is strictly prohibited. All payments must be supported by an invoice and a contract or order containing sufficient detail to reflect the services performed and must be recorded accurately and promptly.

1.7 Confidentiality of personal information

LANIFICIO SUBALPINO srl ensures the confidentiality of all information in its possession and complies with the regulations regarding the management of personal data, in order to avoid the communication or dissemination of personal data without the interested party's consent.

The company is committed to protecting and respecting the privacy and confidentiality of the personal information of its employees, customers, and partners by implementing the following measures:

- **Data Protection:** Comply with all applicable data protection laws and regulations, ensuring that personal data is handled in accordance with relevant regulatory provisions, such as the GDPR (General Data Protection Regulation).
- **Personal data security:** Implement stringent security measures to protect personal data from unauthorized access, unlawful use, or unauthorized disclosure. These measures include access controls, encryption, and other advanced security technologies.
- **Employee Privacy:** Respect the privacy of your employees and handle their personal information confidentially, using it only for legitimate purposes and in compliance with applicable regulations.

- **Customer Privacy:** We ensure the confidentiality of our customers' information by implementing systems and processes that prevent misuse or unauthorized use. We ensure that all customer personal information is treated with the utmost care and confidentiality.

The company invites all personnel to treat with absolute confidentiality any data, news and confidential information they may become aware of in the course of their work **.**

1.8 Reporting violations (Whistle-blowing)

LANIFICIO SUBALPINO srl is committed to promoting an ethical and transparent work environment, offering the possibility of reporting any violations safely and anonymously through:

- **Whistleblowing Mechanisms:** Establishment of secure and confidential channels to allow employees, contractors, and other stakeholders to report violations or behaviors that do not comply with our Corporate Social Responsibility (CSR) principles and the Code of Conduct. These mechanisms guarantee the anonymity of the whistleblower, if requested.
- **Non-retaliation:** Protect all those who report violations or irregularities in good faith by ensuring that they do not suffer retaliation, discrimination, or negative consequences for their actions.
- **Investigations:** Conduct thorough and impartial investigations into reported violations and take all necessary corrective measures to address the issue and prevent future non-compliant behavior.

The Company has established a mechanism for reporting violations of this policy that is anonymous, non-discriminatory, and easily accessible. The Company is committed to taking appropriate measures to protect those who report violations from retaliation, discrimination, or penalties and to treating any information received regarding violations of this policy with the utmost seriousness and taking appropriate action.

Reports must be sent to the following email address

amministrazione@lanificiosubalpino.com

1.9 Sanctioning system

LANIFICIO SUBALPINO srl recognizes the importance of an effective sanctions system to ensure integrity and compliance with company regulations. The sanctions system includes the following actions:

- **Disciplinary Actions:** Implement a system of disciplinary sanctions for violations of the principles and rules established by the Corporate Code of Conduct, including violations of social responsibility and ethical standards and company policies.

- **Legal Compliance:** Ensure that disciplinary actions are always conducted in accordance with applicable legislation and applicable employment contracts, ensuring fairness and transparency throughout the process.
- **Legal Actions:** The disciplinary measures adopted by the company do not preclude the initiation of legal action against those responsible for the unlawful conduct. Each disciplinary action is handled independently but in compliance with applicable legal regulations.

Behaviors that violate the principles established in the Code of Conduct will be subject to disciplinary sanctions pursuant to applicable legislation and/or the employment contract, regardless of any legal action against the perpetrator of such behavior.

2. POLICY ON RESPONSIBLE BUSINESS CONDUCT (RBC - RESPONSIBLE BUSINESS CONDUCT)

The commitments described in this document, which reflect the criteria of the GOTS standard, are implemented through a due diligence process that the company undertakes to use to identify, prevent, mitigate and account for the actual and potential adverse impacts on human rights, workers' rights, the environment and ethical business conduct that its operations, supply chain and other business relationships may have.

Due diligence is a proactive, dynamic, risk-based process informed by meaningful stakeholder engagement, tailored to the circumstances, involving multiple processes and objectives, ensuring ongoing communication, may involve risk-based prioritization, and should not result in a discharge of liability.

LANIFICIO SUBALPINO srl undertakes to:

- use due diligence in decision-making processes regarding issues pertaining to the GOTS standard criteria, following a ***Due Diligence Management Process*** structured into the following 6 steps :

1. Integrate due diligence into your policies and management systems

   - **Political commitment :** The company publishes a clear and formal commitment to responsible business conduct, in line with the GOTS standards (in their latest updated version) and the OECD Guidelines. This commitment serves as the foundation for all due diligence activities.
   - **Management Structures :** Governance structures and management systems are established to support Corporate Social Responsibility (CSR) policies. This includes the appointment of compliance officers and the creation of oversight committees.
   - **Recordkeeping :** Detailed documentation of all due diligence activities, including risk assessments, audits, and corrective actions taken, is ensured. This allows for continuous traceability and verification of progress and compliance.

2. Identification of actual or potential negative impacts associated with one's activities through risk assessment;

   - **Risk mapping:** The company conducts a detailed analysis of its operations and supply chain, identifying the areas most vulnerable to environmental, social, and governance issues. This phase includes stakeholder interviews and data analysis.
   - **Impact Assessment:** Through structured assessment methodologies, the company analyzes the potential negative impacts of its activities on workers, local communities, and the environment, enabling a deep understanding of the implications of business decisions.
   - **Prioritization:** The identified risks are classified according to their severity and probability of occurrence, using risk matrices that help establish priorities in addressing issues.

3. Developing strategies to stop, prevent, or mitigate adverse impacts;

- **Action Plans:** For each significant risk, the Company develops detailed action plans with specific objectives, deadlines, and responsible parties. These plans are reviewable and adaptable based on changes in operating conditions.
- **Supplier Engagement:** The company engages actively with suppliers, clarifying compliance expectations and providing resources and training to help them meet RBC standards. This engagement is essential to ensuring a sustainable supply chain.
- **Training:** Continuous training is provided to both employees and suppliers on social responsibility and sustainability policies and practices, ensuring everyone is aware of industry regulations and standards.

4. Monitoring the implementation of due diligence and its results;

- **Audits:** The company conducts regular internal audits and supplier inspections to verify compliance with GOTS standards (in their latest version) and due diligence policies. These audits serve to identify areas for improvement and ensure transparency.
- **Third-party verification** : When appropriate, the Company uses external verifiers to ensure the credibility and impartiality of its audits. This approach increases confidence in the assessments performed.
- **Continuous Monitoring:** Continuous monitoring systems are implemented to track policy compliance and evaluate improvements over time.

5. Communicating information on how impacts have been addressed;

- **Transparency:** The company ensures transparency regarding supply chain operations, making information on material origins and labor practices accessible. This includes periodic reporting and direct communications to stakeholders.
- **Public reporting** : Regular reporting of sustainability performance and due diligence results is provided, helping to build trust and accountability with stakeholders.

- **Communication with stakeholders** : The company maintains an open dialogue with stakeholders, updating them on the measures taken to address risks and the results achieved. This fosters an environment of trust and collaboration.

6. Adoption of any actions to remedy the damage;

- **Grievance Mechanisms:** The company establishes accessible and effective grievance mechanisms so that workers and stakeholders can report concerns without fear of retaliation. These mechanisms are clearly communicated and supported by a secure communication channel.
- **Corrective Actions:** When human rights violations or environmental impacts are identified, the Company will implement appropriate and timely corrective measures, working to address the issues effectively.
- **Follow-up:** Follow-up is planned to ensure that corrective actions have been implemented correctly and that issues have been resolved appropriately. This process includes a post-intervention evaluation to monitor results.

- Conduct due diligence on the most significant risks associated with the Organization's operations and supply chain, prioritizing action based on the likelihood of the risk and the severity of the potential harm, and consulting with potentially affected stakeholders. The Company requires the same commitment to due diligence on the most significant risks from its business partners, including suppliers, licensees, purchasing agents, logistics providers, and other intermediaries. The Company also requires suppliers to pass on the request to conduct due diligence to their own suppliers.

- meaningfully involve internal and external stakeholders in the due diligence process. This means timely, good-faith, two-way, and responsive communication;

- 4.2.1.6. The RBC Policy should include the Certified Body's expectations that suppliers will also conduct due diligence on significant risks in their part of the supply chain.

- 102 Suppliers should be required to pass the same or equivalent due diligence expectations on to their own suppliers.

- hear and address all complaints, submitted through legitimate processes, regarding the company's activities or any harm caused by the company or its supply chain;

- participate or cooperate with legitimate remediation processes when the company's or its supply chain's activities have caused harm to people or the environment.

The company undertakes to review and, if necessary, update the Responsible Conduct Policy periodically and, in any case, whenever necessary.

For further information on the policies detailed here, please contact Mr. Andrea Rosa

@: rosa@lanificiosubalpino.com

Cossato, 05/02/2026

Andrea Rosa, CEO
LANIFICIO SUBALPINO SRL