



Code Of Ethics

1. Introduction

Mondottica is a customer focused international fashion eyewear company that is committed to making beautiful product and bringing it to life around the world.

Our mission is to help people to see, through excellent partnerships, beautiful product and influencing positive change for all.

Through our collaborations and our partnerships, we aim to bring our Brand Partners vision to life through eyewear design. Our Design philosophy marries 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. While we create well-made and beautiful eyewear for our customers to use and love for a long time, we are also committed to ‘doing good business’, and 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 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.

The purpose of the **Code of Ethics** is to explain our approach to ‘doing good business’ and our commitment to Environmental, Social and Governance issues to all those within our value chain. It sets out our principles to ensure fairness and high standards in the way we operate and is underpinned by substantial policies and practices. Our Company Values as below, underpin our Ethical code.

- We Do The Right Thing
- We Own Our Actions
- We Think Customer First
- We Are Proud
- We Deliver

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, 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:

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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 International Limited and all its subsidiary companies, 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.

Communication and understanding

This code should be shared with all groups above, and where applicable translated and displayed in local languages.

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. This code should not conflict with the spirit of any such rules or laws and in the event of a contradiction being considered, please speak with Kate Box – People and Culture Director.

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

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3. General:

Our Values

Our values underpin the way we do business and guide us in how we behave.

	<p>We Do The Right Thing: <i>Aligned with our intent to Do Good Business, we do what's right for our Customers, Our People, Our Partners and Planet, and for the benefit of the Mondottica business.</i></p>
	<p>We Own Our Actions: <i>Owning our individual, team and Company efforts means we're empowered. We own our decisions, actions, problems and solutions, and learn along the way.</i></p>
	<p>We Think Customer First: <i>We are excellent with our customers, delivering the best we can, based on a strong understanding of their needs and our experience.</i></p>
	<p>We Are Proud: <i>We are proud of doing a good job and delivering our best. We're proud of our continuous improvement.</i></p>
	<p>We Deliver: <i>We provide solutions, with agility and flexibility, acting with pace once decisions are made. We are easy to work with.</i></p>

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, guided by the United Nations Declaration of Human Rights and the International Labour Organisations Declaration on Fundamental principles. Our **Modern slavery statement** is reviewed, updated and published annually and provides clarity on our

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specific actions, training, and communication within our own operations and how we complete due diligence and risk assess our supply chain to ensure the same.

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, with the aim of achieving 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, Data Protection and Information Security policies** provide more clarity, and all are supported by training and further communication with all staff.

Conflict of Interest

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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.

Freedom of Association

We respect for the right of all workers to form and join a trade union of their choice without fear of intimidation or reprisal and protect workers against acts of antiunion discrimination.

Freedom of Expression

We respect for the right of all workers to hold and share opinions and balance that with the need to ensure that we operate within an environment that is free from harassment, discrimination and unlawful speech. Each entity within the Mondottica group will have its ow policies and/or guidance that will provide further clarity.

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.

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- The gifts are reasonable, appropriate, and proportionate and records are kept recording such gifts, that are monitored by an appointed person in country or location.
- 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 People & Culture 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](#)

Fair wage

We recognize the importance of paying a fair living wage, and of financial security to our workforce. We pay a real individual living wage to all staff, in their respective location, and review this annually to ensure we continue to do so.

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.

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We will not tolerate persistent negligent or deliberate failure to follow our employment policies or practices.

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 through open and transparent management practices, working groups, employee surveys and anonymous means of reporting.

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 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 which include our obligations and responsibilities for both physical and mental health and safety.

We ensure our staff are safe when they travel on Mondottica business and take travel advice from governments on risks of foreign travel, and provide an external support for such events.

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 to support our People strategy.

4.4 Our Partners: External Relations

We are proud of our long-standing relationships with Customers, Brand Partners, Suppliers, Distribution partners and work with all stakeholders with a view to partnership, 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 with 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.

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4.5 Our product

The unique DNA of the Brands we partner with are translated into our products and extend to driving quality and supply chain standards, continuous improvement, and the evolution of our collective standards.

Medical Device Regulations

We adhere to the Regulations, Directives and ISO standards: Regulation (EU) 2017/745 of 5 April 2017 on Medical Devices, PPE regulation (EU) 2016/425 and the standard EN ISO 12312-1, 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.

4.6 Our supply chain

We build long standing relationships with our supply chain and require our suppliers, agents and distributors to agree to and comply with our standards and requirements set out in our 'Code of Conduct', and further to re-commit to our code of conduct and demonstrate actions to ensure compliance to our code on an annual basis, including a due diligence audit.

Our annual review of supply chain operations, driven by our own standards and aligned with our Brand partner requirements, requires at least a SMETA (Sedex Members Ethical Trade Audit) certification and ISO 9001 QMS.

4.7 Our impact on the planet

We continue to develop knowledge and strength in partnership relative to 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.

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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 making continuous improvement in our operations, product and resource use.

Within the UK, we are certified silver level with “Investors in the Environment” (iE), a UK national environmental accreditation scheme designed to help organizations save time and money, reduce their impact on the environment and are working towards silver accreditation.

We expect everyone under this code to protect their environment and reduce or limit the use of resources and waste wherever possible, in line with targets set either internally or through legislation.

END

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