

Responsible Marketing and Communication Policy

Our approach to Responsible Marketing

The F.I.L.A. Group is one of the leading global enterprises devoted to the research, design, manufacture, and sale of tools for creative expression. The Group designs, makes and packages tools and supports for drawing, colouring and painting, modelling, for use by children, youths and adults. Our product range includes more than 25 well-known brands and thousands of products sold on all continents.

We are engaged to a responsible behavior towards all our relevant stakeholders in operating business, combining respect of people, natural environment, and communities, and sustainability is therefore embedded with our Purpose, Vision, Mission, Values set out in our Ethics Code, and day-to-day operations.

This policy, together with our Ethics Code and the Corporate Governance Model, should be adopted by all Group companies and form part of the Group Organization, Management and Control Model, in accordance with the principles and objectives of the Organization, Management and Control Model as per Italian Legislative Decree 231/2001.

We are committed to responsible marketing. This means understanding and respecting the needs of our consumers and striving to earn their trust through everything we do. As part of our purpose to inspire and enrich the lives of everyone through creative and artistic thinking, we aim to ensure that our marketing and advertising is socially responsible, in line with our values and does not exploit the vulnerabilities of any individuals or groups.

Our Group Responsible Marketing Policy describes the way we put our commitment into practice, serving as a statement of commitment from F.I.L.A. Group's management and senior executives, a guideline for our marketing and communications teams, and a promise to our employees, business partners, suppliers and all others we interact with.

This Policy covers marketing communications including but not limited to television, radio, outdoor, digital including owned websites and third-party websites, social media, sponsorships and direct marketing and all other forms of communication, including packaging.

This Policy applies to the marketing communication in its entire content and form, including testimonials and statements, and audio or visual material originating from other sources. The fact that the content or form of a marketing communication may originate wholly or in part from other sources does not justify non-observance of the Policy rules.

This Policy refers to communication activities aimed at all Customers and Consumers, with added provisions for communications directed to children.

We are committed to maintaining the highest possible ethical standards and to complying with all applicable laws in all countries in which we do business. We firmly believe to have the responsibility to operate in compliance with the rules of the countries where we have a presence, distinguishing ourselves as an enterprise capable of exporting the values that permeate our actions, by promoting them in the communities where we operate.

Scope of this Policy

This Policy applies to F.I.L.A. S.p.A., its subsidiaries, the entities in which it holds a majority interest, and the facilities that it manages. We are committed to working with and encouraging our business partners to uphold the principles in this Policy and to adopt similar policies within their businesses.

Locally each company should adopt more stringent rules and procedures, as needed and in accordance with local laws and regulations. While conducting its management, coordination and supervision activities, F.I.L.A. S.p.A. respects management autonomy of each affiliate within its Group, managing and controlling the overall business, as per legitimate interests of majority and minority shareholders, considering confidentiality requirements and local applicable laws.

We firmly believe to have the responsibility to operate in compliance with the rules of the countries where we have a presence, distinguishing ourselves as an enterprise capable of exporting the Values that permeate our actions, by promoting them in the communities where we operate. The purpose of this Policy is to provide guidance to F.I.L.A.'s directors, officers, employees, agents, consultants, intermediaries, controlled joint ventures, and other third-party representatives to ensure compliance with applicable regulation and our Values and Policies.

The F.I.L.A. Group is committed to a continuous improvement of its policies and its programs, facilitating the adoption at local level of all procedures, rules, and instructions needed to have the principles set in this Policy applicable and

monitored, in order to make an impact. By adopting this Policy, we believe to contribute to a better condition of existing and of next generations, providing tools for a better quality of life.

General principles

Our Responsible Marketing and Communication Policy is based on the following pillars:

Ethical, Truthful and Responsible Communication

- Identification: the marketing communication should be clearly distinguishable as such, whatever their form and whatever the medium used. The true commercial purpose of marketing communications should be transparent and not misrepresent their true commercial purpose
- Honest claims: We always communicate about our products and their features honestly and accurately
- Transparency: We use clear marketing communications avoiding any statement, claim or audio or visual treatment which, directly or by implication, omission, ambiguity or exaggeration, might mislead the consumer, in particular, but not limited, to: characteristics and features of the product, value of the product, compliance with standards and regulations, copyright and industrial property rights. Our products are clearly and comprehensively labeled, beyond legal requirements where relevant, and always display accurate information relating to our products and their expected use. Product pictures on packaging reflect the product as accurately as possible. We make the boundary between content and commercial promotion clear and always identify commercial content as such.
- Respecting inclusion: Marketing communications should respect human dignity and should not incite or allow any form of discrimination, including that based upon ethnic or national origin, religion, gender, age, disability or sexual orientation. We avoid politically sensitive topics in our marketing such as failure to protect the environment, racism, social exclusion etc.
- Authenticity: Our marketing communications use real people to the greatest extent possible

Communication to children

Particular care is taken in the messages addressed to children, intended as minors up to 12 years, and to adolescents or that can be received by them. These messages must not contain anything that could harm them psychically, morally, or physically, and they must also not abuse their natural credulity or lack of experience, or their sense of loyalty.

- Fair communication: We provide marketing communications that do not contain misleading information or terminology. Marketing communications directed to children should be clearly distinguishable to them as such
- Respecting parental authority: We do not take advantage of children's imagination or inexperience or undermine their parents' authority through marketing messages

Environmental claims

- Commercial communication that declares or evokes benefits of an environmental or ecological nature must be based on truthful, pertinent and scientifically verifiable data. This communication must make it possible to clearly understand which aspect of the advertised product or activity the benefits claimed refer to
- Marketing communication should be so framed as not to abuse consumers' concern for the environment or exploit their possible lack of environmental knowledge and should not contain any statement or visual treatment likely to mislead consumers in any way about the environmental aspects or advantages of products, or about actions being taken by the marketer in favour of the environment

Transparent labeling

- Transparent labeling: We comply with Product Labeling Laws in all the markets in which we operate, and where product packaging permits, we increase the size and content of our labels for increased ease of accessibility of critical information for consumers

Consumer Data Privacy

- We conform to F.I.L.A. Group's Data privacy rules and policies covering all aspects relating to the collection and use of information of our consumers. We ensure that we will act transparently, protect and secure the data, respect the rights of our consumers and verify compliance with all legal requirements. For further information, please review the F.I.L.A. Group's Data privacy Policy.



F.I.L.A.'s Top Management has a strategic role in the full implementation of this Policy ensuring the involvement of all personnel and of those who collaborate with F.I.L.A. and the consistency of their behavior with the values embodied in this Policy.

This Policy is communicated within the organization and made available online to all stakeholders on the web site www.filagroup.it.

F.I.L.A. encourages anyone who becomes aware of facts or behaviors contrary to the Company's Code of Ethics, policies and internal rules, laws or regulations, to make a report in the utmost confidentiality. Assuring confidentiality of the whistleblower's identity, F.I.L.A. offers the following channels to file a report:

- E-mail: whistleblowing.fila@gmail.com
- Mail to odv@fila.it: Organismo di Vigilanza, F.I.L.A. Fabbrica Italiana Lapis ed Affini S.p.A. Via XXV Aprile, 5 20016 Pero (MI).

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GROUP CEO – Massimo Candela