

MAGLIERIE MONTEGRAPPA

Via Padova 64
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CODE OF CONDUCT

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1. Introduction of the company

Maglierie Montegrappa SRL is a manufacturer that produces womens, mens and childrens garments in both knitwear and fabric, for third companies.

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2. Our commitments

As for the development and improvement of its organisation, the company follows an uncertified ethical system, of which is part the current ethical code. The company has expressed their commitments in their ethical policy, which is at the base of the values of the ethical system.

3. Involvement of third parts

This code of conduct is shared with all the interested parts, within the trading relations, to the followings:

- external suppliers,
- external collaborators;
- consultants;
- trading partners;
- material suppliers, in relation to its relevancy;
- internal employees.

The code of conduct and the ethical policy are available on the company's website, for any other interested parties, to the following link:

<http://www.maglieriemontegrappa.com/>

MAGLIERIE MONTEGRAPPA SRL asks all subscribers of this code of ethics to undertake to comply with what is defined in this document and in the ethics policy.

3.1 Suppliers and collaborators

I The suppliers that work with the company are asked to acknowledge this code of conduct, its ethical policy, as well as their subscription. During CONTRACTUAL TIMES, the management asks to the suppliers for their agreement to this code of conduct.

All the technical, working, employees and internal structure informations of Maglierie Montegrappa and of their clients cannot be shared.

3.2 Internal employees and their training

The company's employees represent the most important asset for the flow of work as well as the success of the company itself. The respect of the commitment of the ethic policy and the realisation of the commitments through the ethical system and the code of conduct are objectives that the company is constantly following. In order to guarantee the spread, the acknowledgement and the application of these principles as well as of the code of conduct rules, the following procedures have been established:

- when a new resource comes, a copy of the company's code of conduct is given and explained. After the acknowledgement of it, the person will have to sign the documentation of the ethical code;
- Periodically, educational activities about the code of conduct take place, paying particular attention to the health and safety aspects in the workplace.

These activities are documented, and in the planning of these, workers representative associations join the meetings.

4. Respect of international rules

The content of this code of conduct has been elaborated starting from the ethical policy contents and considering the laws written by the United Nations, the ILO, the national and european legislation. The following elements have been considered:

- the convention of the International Workers Organization (ILO);
- the convention of the United Nations regarding children's rights;
- the Universal Declaration of Human Rights;
- the convention of the United Nations regarding the abolishment of any discrimination towards women and any form of racial discrimination;
- the International Agreement of the civil, political, economical, social and cultural rights;
- the entire national and communitarian laws regarding the topic, including D.Lgs. 81/2008 and the following modifications regarding health and safety in workplaces;
- the entire national and communitarian legislation regarding the environment.

5. Underage labour

The company does not use or supports underage labour. During the hiring process, the candidate is asked to supply an identity document which can testify about their age. In case of young candidates (from 16 to 18 years old), the company respects what is written in the national laws regarding this topic. The company is available to collaborate in activities and projects with schools, in regards the matter of school-working programs.

In any case, the company does anything in their power in case a underage worker would counterfeit their documentations or in case they found about any underage workers within the laboratories they work with. In this case the authorities will be contacted and the ONG (Telefono Azzurro or Save the Children), and the company makes itself available regarding the initiatives about the safeguard of the underage worker.

6. Forced labour

The company does not use or support to any form of forced labour, does not keep on hold any identity cards or any other document that could force the worker to stay within the company without their will. The company

does not ask the employees to pay for any deposit at the beginning of the working relationship. The company does not hold parts of the wage, nor compensations, properties or documents of their employees, with the aim of forcing him/her to keep working in the company. In the hiring process, commissions or other costs will never be asked to the candidate. The worker is free to leave the workplace without any constrictions, but giving a reasonable notice to the employer. The worker is free to end their working experience following what is written in the national laws and the CCNL. The company does not support in any way slavery. All the overtime working are voluntary and the company assures full freedom of movement within the spaces with the only limitations is given by the ones imposed by the organisation of health and safety of the company.

7. Health and safety in the workplace

The company considers fundamental to promote the health of the workers and to guarantee their safety within the workplace, making use of the help and support of an internal organisation of health and safety, constantly evaluating risks and adopting the necessary measures. It is fundamental to form the employees and to be supported by the representing parts of workers (RLS) regarding the measures to adopt in order to reduce risks and prevent any injuries.

The company follows the duty of the D.lgs. 81/2008 and s.m.i.

7.1 Workplace

The company guarantees a safe and healthy workplace, in which any risk has been identified and evaluated. The organization has adopted all the adequate measures to prevent and reduce any health and safety risk to the workers, in line with the current legislation.

The environment is clean and tidy, guaranteeing a safe and empty emergency way, as well as a correct maintenance and periodic check of the fire prevention implants.

7.2 Safety organization

The company puts effort into:

- guaranteeing the presence of a specific team of people who are part of a safety organisation, which have received a specific safety education to deal with their responsibilities and emergencies;
- elaborating and put in place a plan of emergency management which clarifies the way of acting of the employees in the case of an emergency. The headquarter has automatic fire prevention systems that get checked on a regular basis. Also, emergency simulations take place on a regular basis;
- educating, informing the workers and visitors regarding the risks linked to the workplace. If the employees use machineries, they must be formed about the correct way of using those as well as the safety and emergency measures related;
- supplying employees and visitors the DPI needed in the evaluation of risks;
- making employees undergo sanitary surveillance, following the protocol issued by the assigned doctor;
- at least once a year, having a meeting with the employer, the doctor and the employees representatives (RLS) to verify and plan the health and safety activities.

7.3 Chemical products

The company puts effort into verifying the dangers and to evaluate risk and safety of the employees, linked to the substances used. Therefore an evaluation of the chemical risks take place, identifying the measures adopted by the organisation. The company puts effort into using the least dangerous products for the safety of its workers, with a particular attention to chemical products classified as carcinogenic, mutating, teratogenic and rep toxic.

The substances are stored in selected areas and the people that handle those substances are informed of the specific risks. The company makes available the protection measures both on a individual and a collective level (DPI) to the workers that are exposed to the chemical risk.

8. Freedom of meeting

The company respects the right of the employees to take part, organise and participate to workers unions of their choice and to directly contract with these organisations and declares to be open to any dialogue with workers unions.

The company does not ostacolate any will of their employees to register to workers unions.

9. Discrimination

The company does not tolerate any form of discrimination in hiring, retributing, educating, promoting, ending the relation or retiring, based on race, nationality, status, birth, religion, disability, gender, sexual orientation, workers unions joining, political opinion, age or any other condition that could end up in discrimination.

The company does not interfere with right of their employees to follow principles or practices, or satisfy needs, connected to race, nationality, social origins, religion, disability, gender, sexual orientation, responsabilità of relatives, belonging to workers unions, political opinions or any other condition that could end up in discrimination.

The company does not make the employees take pregnancy or virginity tests.

The company promotes the prevention and control of incorrect and unfair behaviours, including verbal abuse, gestures, and inopportune tones.

10. Disciplinary practices

LThe company puts effort into trading their employees with dignity and respect. The company has adopted a system of disciplinary measures and action, in line with what the current legislation says and with the CCNL.

11. Working hours

The company complies with what is written in the national legislation and the CCNL. In particular: the length of the average working hours must not go over the 40 hours a week.

It is not allowed to work more than 12 hours overtime per week:

- each worker has the right of at least 11 hours off every 24 hours there is a break whenever the working day is over 6 hours long
- every seven days the worker must have a minimum period of 24 hours off. This is usually on Sunday, to which the 11 hours of daily rest have to be added;
- each worker has paid yearly holidays of length of at least 4 weeks.

12. Wages

The company puts effort into creating working relationships regulated by the CCNL.

The company puts effort into providing wages that are always equal or above the minimum stated in the law or in the collective related contract and must always be sufficient to satisfy the basic needs of the employees and to provide extra income for subjective needs. In particular, the company puts effort into not using collective contracts or other kinds of contracts that do not guarantee a dignitose income and always need to be sufficient to satisfy the basic needs of the employees.

The company guarantees that the workers always receive a detailed and specific information regarding the composition of the wage and of the indemnities. The national working contract clarifies the causes that could lead to disciplinary action and possible deduction with a disciplinary aim. The day of the wage payment and the modality must be clarified in the contract.

The company does not make contracts where it is possible to abuse the typology of the collaboration relationship with the aim of not regularizing the contributive position of the worker, nor it applies schemes of fake apprenticeship to avoid the fulfilment of the duties of working and social security.

13. Respect of intellectual property

The company puts effort into guaranteeing and protecting the intellectual property and the patent of their clients, using organisational and operative methods to defend the heritage.

It is strictly forbidden to the employees of Maglierie Montegrappa to share to third parts or competitors, any information of the company or regarding the clients and products. It is forbiddent to share names of workers from clients companies as well as informations, technical data regarding production, whether it's past, current or future products.

All the technical, working, and structural informations cannot be shared from Maglierie Montegrappa employees or collaborators.

14. Fight to corruption

The company puts effort into not offering, promising or request any tangent and to oppose to solicitation of tangent, to the request of occulting, dissimulating financial flow, company resources, with public or private people, or to declare false elements regarding taxes, fiscal matters, and to keep transparent and honest relationships with external and internal collaborators as well as public authorities.

It is forbidden to employees to ask or take any grant in form of money or in any other shape or form from thirds or suppliers in order to favour purchases of specific materials or goods from specific people. It is forbidden to suppliers or external workers to offer compensations, whether in form of money or goods, to Maglierie Montegrappa workers with the aim of receiving supplies or orders to produce in favour of specific suppliers or workers. It is also forbidden to commission production orders to external workers instead of others for extra incomes or benefits.

15. Transparency in trading

The company puts effort into contrasting any unfair trading practise, towards clients, distributors and its own chain of suppliers. The company uses exclusively institutions of credit operating in the national area.

16. Fight against criminal and terrorist associations

The company does not support or promote in any way criminal or terroristic associations of any nature. If the company will ever come in contact of these, the company will immediately contact the authorities and report the situation.

17. Environmental safeguard

The company puts effort into safeguarding the environment as a resource for the future generations, in the following forms:

- respect of the national laws about this matter;
- promoting practices of prevention of environmental accidents;
- promoting the use of renewable resources;
- promoting, even in the supply chain, the use of voluntary standards with the aim of improving the environmental performance and the sustainability of the actions;
- choosing chemical products that are less polluting and dangerous to the environment;
- reducing the quantity of waste produced, in particular the more dangerous ones.

18. Reports and complaints

If others has the need to communicating the company any violation of this code of conduct, even from their own employees, the company can follow the following ways:

Sito aziendale: <http://www.maglieriemontegrappa.com/contatti/>

E-mail: info@maglieriemontegrappa.com

Via posta al seguente indirizzo:

Maglierie Montegrappa Srl

Via Padova, 64 - 31031 Caerano di San Marco (TV) - Italia

The company puts effort into replying within 15 days with a written reply, guaranteeing the privacy and anonymity of the person sharing the violation.