



**Excellence in details**

## **CODE OF ETHICS**

### **Introduction**

The Riri Group recognises the importance of adopting and sharing a system of values, standards and practices on the issues of social accountability, ethics and environmental protection. Therefore, the RIRI group (hereinafter RIRI) applies a number of rules and guidelines based primarily upon the Conventions of the International Labour Organisation (ILO), the Universal Declaration of Human Rights and the Global Compact of the United Nations.

At the same time RIRI requires that all Suppliers guarantee that the same principles and values apply to their employees, collaborators and sub-suppliers, and oversee that the company standards described herein are effectively met.

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#### > COMPANY STANDARDS

The Riri Group is committed to engaging in ethical practices at every production site, in compliance with international conventions and local and national laws, particularly labour legislation and those for the good of the company.

In addition, the Riri Group undertakes to:

- provide its workers adequate information on their rights and obligations stemming from the above rules and standards and appoint someone to oversee implementation;
- share the company standards of Riri with its suppliers, sub-contractors and sub-suppliers and to check compliance with adequate and efficacious measures;
- To not maintain any kind of sponsoring relation with organizations, associations or movements that pursue, directly or indirectly, unlawful or illegal conducts.
- To report all significant activities carried out to make sure that everyone abides by these norms.
- To not condone any form of corruption, monetary donations or granting of favors and goods, with the purpose to influence or compromise independent judgement or professional integrity in the carrying out of business relations with the Group.

#### > UNDECLARED WORK

Riri Group prohibits any form of undeclared work, off the books retribution or employment of individuals without residence permit. It also bans any activity that could allow illegal entry in Italy of illegal immigrants.

#### > CHILD LABOUR

The Riri Group is committed to respecting the 15 years minimum age for entering the labour force and does not employ workers who have not yet reached the age where school attendance is no longer obligatory.

The Riri Group ensures that under age employees do not perform hazardous jobs, but instead do a job that fits their education and training, their health, mental, physical and moral development.

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#### > **FORCED LABOUR**

The Riri Group does not employ personnel that is forced to work against their will and rules out recourse to any form of captivity or slavery.

The movements of employees cannot be restricted during or after working hours and employees must only provide their employer the documents required by law. Also, security deposits are not required and employers should not hold onto the IDs of employees, as they should be at liberty to terminate employment at any time, subject to providing prior notice.

#### > **HUMANE WORKING CONDITIONS**

The Riri Group is respectful of personal dignity and ensures that the same is respected, as well as the privacy and personality rights of each individual. Consequently no form of physical, psychological, sexual or verbal harassment or physical abuse, intimidation or exploitation is tolerated. Disciplinary measures respect the national labour law and human rights standards accepted internationally.

#### > **NO DISCRIMINATION**

All employees are treated equality and have equal opportunities, regardless of their race, skin colour, gender, age, social status, ethic or national origin, faith, membership of labour organisations (including trade unions), political opinions, sexual orientation, civil status or personal disability, state of pregnancy or any other personal trait.

#### > **MAXIMUM AND MINIMUM WORKING HOURS, ANNUAL HOLIDAYS**

The Riri Group follows the rules laid down by national legislation on working hours. In the event the national law contains no provisions on these matters, or is not as strict as the provisions of the ILO, the normal work week is limited to 48 hours and must not exceed the limit of 60 hours, voluntary over-time included. Any employee can take a day off (24 hours straight) at least after every six consecutive days of work and is entitled to take minimum leaves, holiday or pay, provided by law.

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#### > **PAY**

The Riri Group ensures that the pay of workers is sufficient for supporting them and their families and is at least equal to or higher than the legal minimum wage in the country where production is carried out. Wages are paid at least once a month. Employees are offered employment contracts in writing, which are signed prior to starting and set out the sum to be paid and all other legal requirements. Services rendered after normal working hours are paid with the increases provided by law. Deductions exceeding those obligatory by law can only be made with the explicit consent of the worker, although not for punitive or disciplinary reasons.

#### > **HEALTH AND SAFETY**

The employer is responsible for the health and safety of his employees at the workplace. The Riri Group provides a safe and hygienic working environment, and takes the most effective measures for prevention of injuries, occupational diseases, including adequate information and ensures that all employees receive periodic training on health and safety issues.

The Riri Group pays careful attention to risks connected with the danger of fire, use of machinery and chemical substances, creation and marking of escape routes and emergency exits, and keeps them well lit and free of obstacles.

The Riri Group has prepared evacuation plans and holds regular evacuation drills, as required by local law or at least once a year, and has supplied fire fighting equipment and individual protection devices for working on machinery and handling hazardous substances. In addition, it keeps records of all measures taken and has appointed a management representative, as officer in compliance with health and safety provisions.

The Riri Group applies such standards to all areas of the company, including recreational areas, and any accommodation workers are allowed to use.

#### > **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

Workers have the right to form and join organisations of their representatives and category.

The Riri Group is therefore committed not to discriminate, harass, intimidate or retaliate against persons who exercise their lawful right to free association or according to collective bargaining and will make a system for making complaints available to employees.

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#### > ENVIRONMENTAL PROTECTION

All rules and regulations concerning the environment in force in the country where production is carried out must be followed, specifically procedures for management and disposal of wastes, chemical products and hazardous substances as well as management of atmospheric emissions and the treatment of sewage, for which the minimum requirements of law must always be met.

Apart from applying these standards, the Riri Group is working concretely for ongoing reduction or elimination of environmental pollution and is committed to using natural resources in a sustainable manner.

#### > RELATIONS WITH ADMINISTRATIVE AND INSPECTING AUTHORITIES AND ORGANIZATIONS

As part of the relations that Riri Group can come to maintain with inspecting authorities, the following rules of conduct have been established – effective in all offices – under which all employees, consultants and third parties that represent Riri Group:

- Must avoid relations with institutional representatives or inspecting organizations, unless expressly appointed or authorized to do so;
- Must handle relations with the Public Administration and in general with all inspecting organizations, with the highest standards of integrity, so as to provide the utmost transparency;
- Must provide inspecting organizations with data and documents required, in relation to the object of the inspecting activity, collaborating with fairness and transparency;
- Must pressure in no way whatsoever the person asked to make statements to the Judicial Authority, so as to not persuade them to not provide any statement or to provide false ones.

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#### > **POLICIES IN RELATION TO GIFTS AND DONATIONS**

Independently of the type of contact or relation between two parties, it is forbidden to all employees and external consultants of Riri Group to give, offer, accept or receive gifts, handouts, bonuses and any kind of benefit in relation to activities carried out in the interest or on behalf of a company of Riri Group: this, in order to avoid even the suspect that with any of these actions one wishes to receive preferential treatments not compatible with the principles of fairness and transparency shared by Riri Group. The only exception are tokens that have a small value and that are traceable back to standard courtesy or commercial practices that do not acknowledge any improper influence.

#### > **VERIFICATION AND CONTROL ACTIVITIES**

Riri Group has adopted an Organization Model of Management and Control, in compliance with the law 231/2001. By doing so, the company's activity has been analyzed and redefined within and in light of a solid system of verification, based on the principles of fairness, transparency and collegiality, so as to provide Riri Group with the maximum protection from contamination with illegal activities as identified in the decree 231.

In turn, the Riri Group asks each supplier and sub-supplier to allow it to send an independent third party or organisation designated by Riri to verify, at its expense at any time during normal working hours, compliance with the standards described herein and the meeting of Company Standards. The inspectors shall provide proof of the authorisation given.

If a violation of any of the above rules is found, Riri will promptly give the Supplier detailed information, and sufficient time to remedy the situation, depending on the nature and number of corrective measures to be taken.

If the Supplier fails to adequately and immediately remedy the situation Riri can withdraw from the contractual relationship ipso facto with immediate effect, and collect all materials made available for processing.

With regard to a particularly grave or repeated violation, especially when ethical and environmental matters are involved, Riri reserves the right to evaluate each direct and indirect effect of the process, product and image it may have derived from.

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#### > WHISTLEBLOWING

In accordance with the regulations provided by the law 231/2001, Riri Group has created and sponsored internally a whistleblowing policy, that is the possibility to report unlawful conducts or violations of the Organization and Management Model. These notifications must be contextualized and founded on precise facts, which the employee has come to know on account of their role. To the whistleblower will be guaranteed the utmost confidentiality and safety from any act of retaliation, linked to the whistleblowing.

In this regard, Riri is committed to sanctioning whomever violates the protective measures reserved to the whistleblower, as well as those who report with malice baseless accusations.

To facilitate employees, Riri provides in all its offices, an internal mailbox for messages, and an e-mail address where notifications can be sent: both the mailbox and the email address are personally handled by a third party (Monitoring Body) bound by law to treat the identity of the whistleblower with extreme confidentiality.

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