

## SA8000 Code of Ethics

This Code of Ethics is approved by the Management and brought to the attention of the Company's stakeholders by sending/transmitting it upon request

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## 1 PRINCIPLES OF SA8000

M.M. srl a socio unico has implemented a management system conforming to the SA8000 Standard by working to make the principles expressed in the standard more and more "concrete and effective", trying to transpose them into its own policy choices. In order to guarantee compliance with the defined system, it has developed specific tools, including the drafting of this Code of Ethics and the adoption of a management system compliant with the SA8000 Standard.

The SA8000 model lists the requirements for socially responsible behaviour of organisations towards their stakeholders, with particular reference to workers, regulating in particular

- ✓ child work and child labour;
- ✓ forced or compulsory labour;
- ✓ health and safety conditions;
- ✓ freedom of association and the right to collective bargaining;
- ✓ discrimination;
- ✓ disciplinary practices;
- ✓ working hours;
- ✓ remuneration.

M.M. srl a socio unico undertakes to adhere and comply:

- ✓ to all the requirements of the SA8000 reference standard;
- ✓ the Conventions of the International Labour Organisation (ILO);
- ✓ the UN Convention on the Rights of the Child and the Universal Declaration of Human Rights;
- ✓ to all national and international laws on safety in the workplace and protection of privacy;
- ✓ confidentiality and processing of personal data;
- ✓ the rules of conduct defined in its Code of Ethics.

M.M. srl a socio unico considers it right to comply with these standards, not only to give concrete evidence of its duty to respect the human rights of workers in all types of processes and organisations, but also to promote them with its suppliers and partners.

The purpose of implementing this type of management system is to initiate a chain process of compliance with the standards by partners, suppliers and sub-suppliers, trying to influence their behaviour and increasing their attention to ethical and social aspects.

M.M. srl a socio unico operates in accordance with the principles on which the SA8000 Standard model is based. In order to achieve the above-mentioned commitments, M.M. srl a socio unico undertakes to ensure:

- ✓ the constant monitoring and improvement of its Social Accountability Management System;
- ✓ defining, within the framework of Management Review meetings, specific improvement objectives and verifying their achievement;
- ✓ the implementation, preservation of documents and records and effective communication to all personnel;
- ✓ the principles underlying its Social Responsibility management system and the results achieved;
- ✓ constant and adequate information to stakeholders on the results of its Social Accountability Management System.

## 2 PRINCIPLE OF LEGALITY

The Company complies with national and EU laws and regulations and any other legislation in force in the countries where it conducts its business.

### 2.1 objectives and values

The main objective of the Company is the protection of employees and the creation of value for the stakeholders (e.g., profit, job retention, etc.) to which the Company strategies are oriented. In order to orientate themselves in organisational strategy decisions, stakeholders need all the relevant information available; M.M. srl a socio unico creates the conditions for widespread and informed participation of stakeholders in decisions within their competence, promotes equality of information.

### 2.2 impartiality

In decisions affecting relations with its interlocutors, M.M. srl a socio unico avoids any discrimination on the basis of nationality, race, state of health, sexuality, political opinions or religious beliefs.

### 2.3 confidentiality

M.M. srl a socio unico ensures the confidentiality of the information in its possession and refrains from seeking confidential data, unless expressly and knowingly authorised to do so. In the case of the processing of personal and sensitive data, in accordance with EU Reg. 2016/679, M.M. srl a socio unico takes all the necessary precautions and fulfilments prescribed by law.

### 2.4 equity of authority

In entering into and managing contractual relationships involving the establishment of hierarchical relations, especially with its collaborators, M.M. srl a socio unico undertakes to ensure that authority is exercised impartially, fairly and correctly, avoiding any abuse

thereof.

In particular, M.M. srl a socio unico ensures that authority does not turn into the exercise of a power detrimental to the dignity and autonomy of the employee or stakeholder, and that work organisation choices safeguard the value of employees and stakeholders.

## 2.5 conduct in contractual matters

Contracts and work assignments shall be performed as freely negotiated by the parties. M.M. srl a socio unico undertakes not to abuse its bargaining position.

In valid contracts, M.M. srl a socio unico does not take advantage of contractual loopholes, or unforeseen events, to renegotiate the contract for the sole purpose of exploiting the position of dependence or weakness in which the other contracting party finds itself.

In the formulation of any contracts, the Organisation shall take care to specify to the contractor the conduct to be adopted in all circumstances, in a clear and comprehensible manner.

## 2.6 conduct in political matters

The Company undertakes not to finance any political movement or party, either in Italy or abroad, and does not sponsor political propaganda congresses or parties.

Without prejudice to the foregoing, the Organisation may only accede to requests for contributions from organisations and associations that are declared non-profit organisations with proper articles of association and bylaws.

Sponsorship activities, which may relate to social, environmental, entertainment, sports and art issues, are only intended for events that offer a guarantee of quality, or for projects to which the Company can constructively contribute its expertise.

## 2.7 behaviour with institutional bodies

All relations with State or International institutions are exclusively due to forms of communication aimed at assessing the implications of legislative and administrative activities towards the Organisation

In particular, all relations with those in charge of a public service, in order to guarantee the utmost clarity in relations, shall be managed exclusively through contact persons who have received an explicit mandate from the Organisation.

The conduct of the above-mentioned contact persons must be characterised by loyalty and fairness, and always with respect for the institutions.

In relations with the Public Administration, in particular, it is forbidden to offer gifts or money to Public Administration Managers, Officials or Employees or their relatives, whether Italian or foreign.

The Company considers unlawful payments made directly by Italian individuals and/or entities or their employees, as well as those made through parties acting on their behalf in Italy or abroad, to be acts of corruption.

It is prohibited to offer and/or accept any object, service, performance or favour to obtain or procure favourable treatment in connection with any relationship with the P.A..

The following actions must not be taken (directly and/or indirectly) in the course of a business negotiation, request and/or relationship with the P.A.:

- examine and/or propose business and/or employment opportunities that may benefit Public Administration employees in a personal capacity;
- offer and/or provide free gifts (of any kind and nature);
- solicit and/or obtain confidential information that may compromise the integrity or reputation of both or either Party.

## 2.8 environmental behaviour

The environment is a primary asset that M.M. srl a socio unico is committed to safeguarding. To this end, the Company complies with the legislation in force in each country where it carries out its activities, and organises its management in compliance with it and with the ISO 14001 organisational model currently implemented in the Organisation.

## 2.9 safety behaviour

M.M. srl a socio unico is committed to complying with current legislation on the protection of health and safety in the workplace, and organises its business and economic management in compliance with it and in accordance with the UNI ISO 45001 organisational model currently implemented in the Organisation.

The Company is committed to disseminating and consolidating a safety culture, developing risk awareness, and promoting responsible behaviour by all employees.

The Company works to preserve the health and safety of workers through preventive actions, guarantees the physical and moral integrity of personnel, and guarantees working conditions that respect individual dignity.

## 3 PROTECTION AND ENHANCEMENT OF HUMAN RESOURCES

Human resources are considered a primary factor in the achievement of objectives by virtue of the professional contribution they make, within a relationship based on loyalty, fairness and mutual trust.

The Organisation safeguards and promotes the value of human resources, favouring their professional growth, striving to avoid discrimination and guaranteeing equal opportunities, as well as offering working conditions that respect individual dignity and a safe and healthy working environment, in compliance with current regulations and workers' rights. Relations between the different hierarchical levels must be characterised by loyalty, fairness and correctness, based on the principles set out above.

## 4 COMPETITION

The Company is committed to complying with current legislation on fair competition and antitrust laws.

M.M. srl a socio unico refrains from any collusive behaviour and abuse of a dominant position, and fully and scrupulously complies with the antitrust rules and directives of the market regulating authorities.

### 4.1 acts of commercial courtesy

Any act of commercial courtesy, whether a gift, gratuity, benefit or any other utility, is permitted only when it is such that it cannot be construed as aimed at acquiring an improper advantage.

Persons who receive gifts that cannot be attributed to normal courteous relations shall inform the relevant supervisor without delay.

In any event, irrespective of the duty to disclose, the above-mentioned persons shall refuse the promised or offered benefit, whether to themselves or to a member of their family.

The Organisation undertakes to adapt its corporate management to the following regulations: International Covenant on Economic, Social and Cultural Rights, International Covenant on Civil and Political Rights, United Nations Guiding Principles on Business and Human Rights.

## 5 CHILD WORK AND CHILD LABOUR

The Organisation undertakes not to employ persons under the age of 15.

The Organisation undertakes not to employ young workers under the age of 18 in unhealthy or dangerous situations, nor during school hours.

The Organisation undertakes not to employ child labour in the production of any product or the provision of any service, where child labour is defined as the services of persons under the age of 15 who are unable to attend compulsory school or to lead a life appropriate to their age.

The Organisation is committed to ensuring that underage workers enjoy effective conditions for learning, growth and professional development, as well as appropriate health and safety conditions and training in this regard.

The Organisation undertakes to adapt the Company management to the following regulations: ILO Conventions 138 - ILO 182 and Recommendation 146, as well as Legislative Decree 81/08 as amended, including its implementing decrees and subsequent amendments, Law 25/55, Law 977/67, Law 451/94, and the United Nations Convention on the Rights of the Child.

## 6 COMPULSORY LABOUR AND FORCED LABOUR

M.M. srl a socio unico condemns, does not resort to or support human trafficking.

The Organisation undertakes not to employ personnel who work against their will or who are not free to terminate their contract of employment.

The Organisation undertakes not to employ non-voluntary personnel (prisoners, persons defaulting in respect of the Organisation), who are subject to non-legal restrictions in their freedom to sever their work engagements (seizure of documents, salaries not paid and kept as security), who are not protected by a form of contract. In particular, the Organisation undertakes not to use undeclared labour and to guarantee, in compliance with the law, the use of permits by workers.

The Organisation undertakes to adapt company management to the following regulations: ILO Conventions 29-ILO 105, as well as Law 300/70, Law 108/90, Law 297/82, Legislative Decree 152/97.

## 7 FREEDOM OF ASSOCIATION

The Organisation undertakes not to prohibit, hinder or penalise trade union activities, guaranteeing staff the appropriate conditions to practise this right in the working environment.

The Organisation is committed to enabling workers to bargain freely and in accordance with the law, without fear. The Organisation is committed to guaranteeing the freedom to join the union, which must be ensured by not pressurising those who join, not discriminating against them in their tasks and growth processes, recognising elected representatives as privileged interlocutors, and guaranteeing them the places and time to carry out union activities.

The Organisation undertakes to adapt company management to the following regulations: ILO Conventions 87 - ILO 135 - ILO 98

## 8 DISCRIMINATION

The Organisation is committed to ensuring equal opportunities for all workers:

- select workers on the basis of skills and abilities,
- treat all workers equally, offering them equal opportunities and conditions, with regard to: recruitment, remuneration, training, promotion, dismissal and retirement.

The Organisation is committed to not implementing or supporting discrimination on the basis of: race, class, nationality, religion, disability, gender, sexual orientation, trade union membership or political party affiliation. The Organisation does not permit threatening, abusive, exploitative or sexually coercive behaviour.

The Organisation undertakes not to hinder personnel in the exercise of their personal rights to follow principles or practices, or to meet needs related to: race, class, nationality, religion, disability, gender, sexual orientation, trade union membership or political party affiliation.

The Organisation undertakes not to permit conduct, including gestures, language or physical contact, that may be deemed sexually coercive, threatening, abusive or exploitative.

The Organisation undertakes to adapt its corporate management to the following regulations: ILO 111 - ILO 100 - ILO159 - ILO 177, the UN Convention to Eliminate All Forms of Discrimination against Women and Racial Origins, as well as Law 300/70, Law 903/77, Law 125/91, Law 40/98, Law 53/2000, Legislative Decree 151/01, Directive 75/117/EEC, Directive 76/207/EEC, Law 108/90.

## 9 DISCIPLINARY PRACTICES

The Organisation undertakes not to apply disciplinary measures contrary to the dignity and respect of the person of the worker, limiting itself only to the measures provided for by the legislation in force.

The Organisation is committed to treating all workers with dignity and respect, strictly excluding the use of any kind of unusual and/or bodily disciplinary practices. Disciplinary practices of suppliers shall comply with all applicable local laws and regulations for workers in use.

Care must be taken to ensure that 'psychological terror' and 'sexual harassment', i.e., psychological pressure and conditioning with verbal and gestural allusions, do not occur, the Organisation undertakes not to use unfavourable working conditions as 'instruments of punishment', and not to adopt hasty and simplistic disciplinary practices.

The Organisation undertakes to adapt its business management to the following regulation: ILO Convention 29.

## 10 WORKING HOURS

The Organisation undertakes not to work more than 40 hours a week, nor to ask for more than 8 hours of overtime, agreed with the worker.

The Organisation undertakes not to routinely ask for overtime. Working hours must respect the total number of hours stipulated in the national contract for the category, and overtime, when necessary, must be appropriately compensated and not exceed eight hours per week. In particular, it is important to plan work carefully, trying to rationalise production processes, to correctly foresee the number of staff needed, to avoid forcing employees to work excessive overtime and to ensure that they enjoy their planned holidays.

Employees must, however, be guaranteed at least one day off in seven.

The Organisation undertakes to adapt its management to the following regulation: ILO Convention 98.

## 11 RETRIBUTION

The Organisation undertakes not to pay its workers' wages that are lower than those set by legislation as minimum wage and to ensure that its workers are paid a decent living wage.

The Organisation is committed to ensuring that its workers are paid a wage that complies with all applicable local laws in this regard, including those determining the minimum wage, and allows them to live in a dignified manner.

The Organisation undertakes to adapt its management to the following regulations: ILO Conventions 100 - ILO 131, as well as Law 300/70, Law 297/82, Law 863/84, Law 230/62.

## 12 SUPPLIERS

M.M. srl a socio unico ensures that relations with customers and suppliers are conducted in compliance with the law and in application of the general principles of the Code of Ethics.

In particular, customer relations must be characterised by fairness, courtesy and helpfulness.

In relations with suppliers, selection processes must be based on an objective competitive comparison, avoiding any form of favouritism and/or discrimination. Through its Code of Ethics, M.M. srl a socio unico establishes the minimum requirements with which the Organisation must comply. Suppliers will have to inspire their management to respect the SA8000 Standard as this will be a preferential condition for maintaining and strengthening relations with the Organisation.

M.M. srl a socio unico will act towards its suppliers in a progressive manner in order to obtain the following end goals from them:

- ✓ a commitment to comply with all requirements within an agreed time frame based on the critical issues identified for suppliers



belonging to categories identified as critical, also as a determining factor for the continuation of the relationship, compliance with all requirements of the Standard, adherence to the SA8000 programme.

Where provided for in contractual agreements, the Organisation will aim to obtain a commitment to

- provide all interested parties with information that can attest to compliance with the requirements of the SA8000 Standard;
- allow all interested parties access to their premises, subject to agreement, and planning of activities, to verify compliance with the requirements of this Standard;
- request the availability expressed in the previous points from their suppliers.

With regard to the supplier intervention plan M.M. srl a socio unico undertakes to:

- ✓ activate second-party audits on the most critical suppliers, where third-party audit results were not already available;
- ✓ stimulate the suppliers used to adopt the SA8000 Standard in their turn.

The Organisation also undertakes to urge its suppliers to:

- ✓ extend knowledge of the Standard's requirements and adherence to the same project to their suppliers, aware of the need to develop a culture and awareness of social responsibility issues to make all efforts in this regard effective and efficient;
- ✓ maintain accurate and comprehensive records of ethical issues for all suppliers with whom they interact on a continuous basis.

## 13 MANAGEMENT SYSTEM

The Organisation commits itself and its suppliers to:

- extend the SA8000 Standard to their suppliers, aware of the need to develop a culture of social responsibility issues to make their efforts effective and efficient;
- accurately record and monitor critical suppliers with whom one interacts on an ongoing basis, in order to reinforce and disseminate the principles of ethical behaviour;
- informing the Organisation's personnel of the requirements of SA8000;
- if necessary, carry out any required corrective actions.

### 13.1 Resolution of non-conformities/complaints

All the Organisation's suppliers are encouraged to manage non-conformities and complaints in an ISO 9001 perspective, through a process of identification, registration, analysis of causes and resolution.

Where a non-conformity or complaint that has arisen about a supplier to the Organisation may have a significant impact on the Organisation, then the supplier will necessarily be obliged to resolve it and communicate the outcome to the Organisation's Social Performance Team (SPT). The SPT can also provide full support in managing the process. The SPT will be responsible for recording the incident and conducting a review of the associated risk analysis in order to assess any necessary changes.

### 13.2 implementation mechanisms and remedial actions

With regard to reports of possible violations of the rules contained in the Code of Ethics, everyone should contact the Workers' Ethics Representatives and/or the Social Performance Team (SPT).

M.M. srl a socio unico guarantees that no one in the workplace may suffer retaliation, inconvenience or discrimination of any kind for having reported violations of the Code of Ethics, and following the report they will promptly follow up with appropriate checks and adequate remedial measures.

Violation of the principles set out in this Code compromises the relationship of trust between M.M. srl a socio unico and its directors, employees, collaborators in various capacities and suppliers and will be promptly pursued by the Organisation through appropriate measures.

Failure to comply with the principles listed in this Code of Ethics may be grounds for contractual termination. In order to protect its image and to safeguard its resources, M.M. srl a socio unico shall avoid any relationship with parties that do not operate in compliance with the laws in force and according to the values and principles set forth in the Code of Ethics.

The SPT has the task of verifying any reports of violations of the Code of Ethics; it also has the power to examine documents and consult data and suggest possible updates to the Code of Ethics, also on the basis of reports received.