



Customer Code of Conduct

Contents:

Introduction	1
Purpose	1
Scope of applicaton.....	1
General Conditions	1
Ethics	2
Labour	2
Quality, health, safety and the environment.....	3
Company management systems.....	4

Introduction

“Sustainability, like justice, is a value that is not built by purely individualistic market processes.” - Herman Daly, 1986

- Sustainability is a key element of RadiciGroup values and is an integral part of its business strategy. It is a complex and ambitious goal RadiciGroup aspires to achieve with the participation of all its stakeholders, sharing critical issues and solutions as well as common growth processes and continuous improvement.
- RadiciGroup relationship with its Customers, major Stakeholders, is based on the principles of legality, transparency, fairness, trust and cooperation.
- This Customer Code of Conduct aims at building increasingly closer cooperation in order to strengthen these principles while building together a supply chain focused not only on the quality of products or services, but also on the environment and social and working conditions where the products or services are designed, manufactured and marketed.
- RadiciGroup therefore invites all its Customers to share and implement the principles expressed in this Code of Conduct.
- Where the Customer has a Code of Ethics or Conduct similar to this, or a sustainability reporting system according to the GRI model, upon appropriate assessment by RadiciGroup, these documents may be accepted in lieu of signing this Customer Code of Conduct.

Purpose

- Radici Partecipazioni S.p.A. and its Subsidiaries (henceforth identified as “**RadiciGroup**”) manages its Customer relationships with honesty, fairness and professionalism, encouraging ongoing collaboration as well as strong and lasting relationships of trust.
- RadiciGroup builds its Customer relationships aiming at fully satisfying their needs, with the goal of creating a solid relationship inspired by the general values of fairness, honesty, efficiency and professionalism.
- Through this Customer Code of Conduct (henceforth identified as “**Code**”), RadiciGroup intends to consolidate such relationship by sharing with its Customers a common path leading to the construction of a sustainable Supply Chain with reference to social, environmental and financial issues.

Scope of application

- This code shall apply to all RadiciGroup companies and related Customers.



Customer Code of Conduct

- Upon signing this Code, the Customer therefore accepts and subscribes to the General Conditions of Sale.

General Conditions

- RadiciGroup undertakes to comply with the law in any location where it operates. Similarly, Customers shall undertake to comply with all laws, regulations, existing contractual agreements, standards and generally accepted technical rules.
- Customers are encouraged to implement the necessary mechanisms to identify, determine and manage risks in all the areas covered by this Code and to comply with all applicable legal requirements.
- Furthermore, Customers are encouraged to continuously improve the suitability, adequacy and effectiveness of their sustainability policies through appropriate measures.
- Moreover, they are encouraged to maintain appropriate documented information demonstrating the sharing and implementation of the values expressed in this Code.
- The latest version of this Code can be downloaded from our website www.radicigroup.com

Ethics

Business integrity

- RadiciGroup does not practice nor tolerate any form of corruption, extortion or embezzlement.
- In light of the above, Customers undertake not to offer bribes or other illegal incentives to the Employees of RadiciGroup, nor to offer gratuities or other personal benefits, provided that they are not of such a nature or closely connected to common courtesy, so as not to be interpreted as aiming at obtaining preferential treatment.
- For its part, RadiciGroup shall never request, directly or indirectly, or accept such illegal incentives or gifts.

Transparency

- RadiciGroup will promote correct and transparent processes for the selection of potential Customers. The latter will be selected based on impartial evaluations of the robustness, reliability and business professionalism but also considering their ethical conduct.
- RadiciGroup undertakes to formulate contracts and trade agreements with Customers that are set out in a clear and straightforward manner, complying with applicable regulations without resorting to elusive or improper practices, and complete in every respect.
- Finally, RadiciGroup undertakes to accompany their products with complete, comprehensible and truthful technical or illustrative documentation.

Intellectual property

- Customers undertake to protect and properly use sensitive and confidential information (e.g. prices, costs, product technical features or information subject to specific confidentiality agreements) of submitted to them and to ensure that RadiciGroup intellectual property rights are protected.
- Customers are required to undertake, in the areas under their responsibility, all measures necessary to ensure that RadiciGroup products and the related know-how do not fall into the hands of counterfeiters, as to ensure and the security of the legal supply chain.
- For its part, RadiciGroup will consider all sensitive information obtained from Customers as absolutely confidential under all circumstances.



Customer Code of Conduct

Labour

Refusal of forced and child labour

- Customers undertake not to use forced, bonded or compulsory labour and shall not resort to any kind of child labour in their supply chain and/or business activities, in accordance with the fundamental International Labour Organisation rules¹ and the principles of the United Nations Global Compact.

(1 Minimum Age Convention, 1973 (no. 138) - Worst Forms of Child Labour Convention, 1999 (no. 182).

Correct treatment and working time

- Customers are required to handle Employee employment contracts in a legal and proper manner in observance of the pertinent labour laws.
- Customers undertake to ensure that there is no inhumane treatment in the Employee workplace whatsoever and that Employees are not subjected to threats, harassment, sexual abuse, torture or corporal punishment, coercion or mental and/or physical abuse.

Freedom of association

- In accordance with national and/or local laws, Customers shall respect the right of their Employees to associate freely, join trade unions, seek representation, join works councils and participate in collective bargaining.

Quality, health, safety and the environment

Quality, Complaint Handling and Continuous Improvement

- RadiciGroup undertakes to meet all contractual obligations and to comply with the qualitative and technical requirements generally accepted and agreed upon with the Customer in order to provide goods and services that are safe for intended use and capable to adequately meet the Customers needs.
- For the purposes of continuous improvement, RadiciGroup undertakes to conduct regular Customer Satisfaction surveys with the Customer and to undertake improvement actions following the findings obtained in surveys.
- Finally, RadiciGroup undertakes to address complaints promptly and to handle them within a reasonable time.

Safety

- Customers undertake to comply with national regulations on quality, health, safety and the environment, as well as to obtain, keep and update all necessary permits, licenses and registrations relating to their products and processes.
- Conversely, Customers shall apply these good quality, health and safety practices throughout the entire supply chain.
- As provided for by current legislation and the Reach Regulation, RadiciGroup shall make available the safety data sheets including all the relevant and necessary safety information for all hazardous substances.

Workplace health and safety

- Customers undertake to protect their Employees from work-related hazards and strenuous tasks in the workplace, as well as from the risks associated with the facilities used by Employees.
- Customers will ensure appropriate actions (controls, procedures, preventive maintenance) to limit workplace health and safety risks. When hazards cannot be adequately monitored by such means, Customers undertake to provide their Employees with appropriate personal protective equipment.

Handling emergencies, risk information and training

- Customers undertake to identify possible and potential workplace emergency situations, as well as to minimise the risk of their occurrence. They further undertake to make available safety information on the risks identified by training employees to ensure their adequate protection.



Customer Code of Conduct

Protecting the environment and conserving resources

- Customers are encouraged to adopt systems, accordingly to what has been done by RadiciGroup, to ensure that waste handling, movement, storage, recycling, reuse or management and the management of air emissions and waste water are carried out safely and in compliance with the relevant country's current legislation.
- Customers are also encouraged to use natural resources sparingly and reasonably (e.g. water, energy sources, raw materials) and to use processes aimed at reducing energy consumption and greenhouse gas emissions in order to mitigate the impact of processes on the planet's resources.

Company management systems

Legal requirements

- Customers undertake to respect the laws, regulations and contractual agreements in force as well as the generally accepted standards.

Transmitting sustainability criteria to the supply chain

- Customers are encouraged to communicate the principles set forth in this Code to their supply chain.

Risk management

- Customers shall implement the necessary mechanisms to identify and manage risks in the areas covered by this Code, while complying with the applicable legislative requirements.

Auditing

- Customers are encouraged to keep appropriate documented information demonstrating the sharing and implementation of the values expressed in this Code. Based on a specific agreement with the Customer, RadiciGroup reserves the right to conduct audits.
- In the event the audit findings show that the Customer does not comply with the letter and spirit of this Code, RadiciGroup reserves the right to undertake an appropriate improvement process together with the Customer.

Continuous improvement

- Customers are invited to continuously improve their sustainability performance by implementing appropriate measures.

Reports for corrective action

Customers will be able to report violations of this Code or any unethical behaviour by RadiciGroup collaborators to the RadiciGroup Ethics Committee through email ethics@radicigroup.com or the communication channels found on www.radicigroup.com.