



Regulation

D336 - Suppliers' Code of Conduct

Rev. 1 of 23/08/2021

Code: SG COR D336

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1 Preamble

1.1 Purpose and scope

The SA8000 model lists the requirements for the correct corporate conduct of organisations with respect to workers, in particular as regards:

- Child labour
- Forced and compulsory labour
- Health and safety conditions
- Freedom of association
- Discrimination
- Disciplinary measures
- Working hours
- Wages

The Salcef Group has considered it appropriate to comply with these standards, not only to testify in a concrete way its duty to respect the human rights of workers in all types of processes and organisations, but also to promote them with its partners.

The ultimate goal is to stimulate a chain process of compliance with the standards by partners, suppliers and subcontractors, influencing their conduct and increasing their ethical and social quality. The adoption of the SA8000 standard gives priority to companies that demonstrate, in addition to their technical and management skills, their sensitivity towards social issues, without generating additional burdens for Customers.

1.2 Definitions

DEFINITION	DESCRIPTION
Management	Management is all those resources which enable the management, by means of decisions, powers and proxies, to achieve its mission.
Operating Directorates (or "OD")	Operating Directorates are the organisational units of the Operating Companies of the Salcef Group, to which projects and orders are assigned once the commercial initiatives have been successfully concluded.
Group company	Each of the Salcef Group companies
CEO	The person who approves the assessment of risks and opportunities and periodic updating, in agreement with this document.

1.3 Acronyms

ACRONYM	DESCRIPTION
CEO	Chief Executive Officer
CKO	Chief Knowledge Officer
QPM	Quality and Privacy Manager
IMS	Integrated Management System
SG	Salcef Group S.p.A., parent company of the Salcef Group

1.4 Reference standard

REFERENCE STANDARD	DESCRIPTION
UNI EN ISO 9001:2015	Quality management systems - Requirements
UNI EN ISO 14001:2015	Environment management systems - Requirements and guide for use
UNI EN ISO 45001:2018	Workers' health and safety management systems - Requirements and guide for use
UNI EN ISO 37001:2016	Prevention of corruption management systems - Requirements and guide for use
UNI EN ISO 31000:2018	Risk management - Guidelines
SA8000:2014	Social Accountability 8000

2 Supplier's code of conduct

This code of conduct, drafted in accordance with the internal procedures of the Salcef Group, aims to imprint fairness, loyalty, integrity and transparency, operations, behaviour, the way of working and relationships both within the supplier company and as regards external parties.

This document is in summary a set of principles and rules, the observance of which by suppliers / subcontractors is considered by Salcef Group, a factor of absolute importance, constituting a decisive asset for the consolidation of relations between the organisation and individual collaborators.

The Salcef Group has drafted this document in order to improve the relationship with suppliers/subcontractors with a view to mutual benefit and considers it a formal supplement to the contractual requirements with suppliers of goods and services, compliance with which will be a condition gradually necessary to maintain and strengthen supply agreements. In particular, the following will be considered as assessment criteria:

- Possession of SA8000 certification;
- Compliance with this code of conduct;
- The undertaking to comply with this code of conduct within an agreed period of time and on the basis of identified critical conditions.

With regard to the above, Salcef Group undertakes to carry out inspections on suppliers who, based on the internal procedure of supplier qualification for social responsibility, are more critical as regards sector or geographical area.

By signing this code of conduct, the Salcef Group formally undertakes, in addition to complying with mandatory and current regulations, to:

2.1 Child labour

Requirements	Reference
<ul style="list-style-type: none"> • Not use child labour to manufacture any product or provide any service, where child labour means the employment of persons under 15 years of age, who are unable to attend compulsory school and/or enjoy a life in keeping with their age. • Provide young workers (children under 18 years of age) with effective learning, growth and professional development conditions, as well as suitable health and safety and related training conditions. • Provide proof of a strong awareness with regard to issues relating to the exploitation of child labour, social discrimination, marginalisation, including with respect its own suppliers. • With regard to children who apply for work or who, in accordance with the above, have to be made redundant, grant appropriate temporary financial support for compulsory schooling. • Safeguard the right of all children to be protected and to guarantee the basic conditions for them to lead an economically and socially dignified life. 	ILO reference Conventions and Recommendations: <ul style="list-style-type: none"> • ILO convention 138 • ILO convention 182 • ILO recommendation 146

2.2 Forced and compulsory labour

Requirements	Reference
<ul style="list-style-type: none"> • Never, for any reason, ask staff members to leave money "deposits". • Never, for any reason, ask staff members to leave original identity documents with the company. • The company, or any other entity which provides work to the company, must not withhold any part of the wages, benefits (indemnities), property or documents of staff members, in order to force such staff members to continue working for the company. • Staff members must be given the right to leave their places of work at the end of the standard working day, and shall be free to terminate their work contracts, after giving reasonable notice to the employer. • Neither the company nor any other entity which provides work to the company must be involved or give support to human trafficking. • Workers shall not be obliged to make debts with the company and in the event of a worker asking for a loan, this must be granted at conditions which are identical or better than those of the market. • Guarantee the payment of any training programmes followed by workers and indispensable for the business activity carried out. 	ILO reference Conventions and Recommendations: <ul style="list-style-type: none"> • ILO convention 29 • ILO convention 105

Requirements	Reference
<ul style="list-style-type: none"> • Payment of wages must be ensured using methods that do not deprive the workers of their right to leave their jobs, within established times. • Ensure the absence of security guards or military personnel in the facility. • Give workers' family members the chance to freely visit the company. • Ensure the presence of adequate work contracts signed by the workers. • Always be willing to give to employees, through communication with the administration department and/or external company which prepares the wage packets, any explanations regarding any items which are not particularly clear. • Provide proof of having trained/informed workers as regards the importance of meeting the requirements relating to compulsory labour. 	

2.3 Health and safety

Requirements	Reference
<ul style="list-style-type: none"> • Conduct a risk analysis of workers' health and safety to identify, avoid or address potential risks to the health and safety of all personnel. • Ensure that staff members receive regular and documented health and safety training and that such training is repeated for new and reassigned staff and in the event of accidents, including through the provision of targeted operating instructions. • Maintain written records of all accidents occurring in the workplace. • In the event of subcontracting, immediately notify the Contractor of the occurrence of any accidents, taking care to specify: the type of accident that occurred, the dynamics that caused it, the duration of the overall days and the closure of each individual accident. • Provide employees with the necessary personal protective equipment to avoid or cope with potential risks to the health and safety of all staff members. • In the case of a work-related injury, provide first aid and assist the worker in obtaining further medical treatment. • Consider all risks arising from the work carried out by pregnant workers/new mothers and ensure that all reasonable steps are taken to remove or reduce any risks related to their health and safety. 	<p>Behind this principle is compliance with Leg. Decree 81/08 as amended and supplemented: compliance with the contents of this decree means satisfying this requirement.</p> <p>ILO reference conventions and recommendations:</p> <ul style="list-style-type: none"> • ILO convention 155 • ILO convention 183

Requirements	Reference
<ul style="list-style-type: none"> Ensure, for use by all staff members, access to clean washrooms, access to potable water and, where applicable, healthy and suitable food storage facilities Give all staff the right to leave work in the event of imminent serious danger without seeking permission from the company. 	

2.4 Freedom of association and right to collective bargaining

Requirements	Reference
<ul style="list-style-type: none"> Not interfere in any way with the formation, operation or management of workers' or collective bargaining organisations as evidenced by the application of the National Collective Labour Agreement referred to in individual contracts/letters of employment. Effectively inform staff that they are free to join any organisation of their choice. Ensure that staff representatives and staff involved in workers' organisation are not subject to discrimination, harassment, intimidation or retaliation for being a member of the union or participating in union activities and ensure that such representatives have access to their members in the workplace. Allow workers to meet, appoint their own representative and communicate with their members in the workplace including through the facilities made available to them for any meetings/gatherings. 	<p>ILO reference conventions and recommendations:</p> <ul style="list-style-type: none"> ILO convention 87 ILO convention 98 ILO convention 135

2.5 Discrimination

Requirements	Reference
<ul style="list-style-type: none"> Select workers according to skills and expertise. Treat all workers equally, offering them equal opportunities and conditions. In recruitment, remuneration, training, promotion, dismissal and retirement, not discriminate or advocate discrimination on the basis of race, social class, national origin, caste, birth, religion, disability, sex, sexual orientation, family responsibilities, marital status, trade union membership, political opinion, age or any other status that might lead to discrimination. Not obstruct staff in the exercising of their personal rights and in following principles or practices or meeting needs related to race, social class, national origin, caste, birth, religion, disability, sex, sexual 	<p>ILO reference conventions and recommendations:</p> <ul style="list-style-type: none"> ILO convention 100 ILO convention 111 ILO convention 159 ILO convention 169 ILO convention 177

Requirements	Reference
orientation, family responsibilities, marital status, trade union membership, political opinions, age or any other status that might lead to discrimination. Not allow conduct, including gestures, language or physical contact, which could be considered sexually coercive, threatening, offensive or intended to exploit.	

2.6 Disciplinary measures

Requirements	Reference
<ul style="list-style-type: none"> • Not enforce disciplinary measures contrary to the dignity and respect of the worker, restricting measures only to those indicated by applicable legislation. • Treat all workers with dignity and respect, strictly refraining from the use of any type of unusual and/or bodily disciplinary practice. • Ensure that 'psychological terror' and 'sexual harassment', i.e. psychological pressure and conditioning by means of verbal and gestural innuendos, do not occur, that unfavourable working conditions are not used as 'punishment tools', and that disciplinary practices are not hastily and simplistically adopted. 	ILO reference conventions and recommendations: <ul style="list-style-type: none"> • ILO convention 29

2.7 Working hours

Requirements	Reference
<ul style="list-style-type: none"> • Not impose working hours of more than 48 hours a week, nor ask for more than 12 hours' overtime, in agreement with the worker • Not ask for overtime regularly • Keep to the total hours indicated in the national collective labour agreement for the category, and ensure that overtime, whenever necessary, is suitably paid for • Provide at least one day of rest out of seven <p><i>In particular, work must be carefully scheduled; an attempt must be made to rationalise production processes, to correctly foresee the number of workers required, so as not to force employees to do excessive overtime and ensure they can enjoy the holidays due to them</i></p>	ILO reference conventions and recommendations: <ul style="list-style-type: none"> • ILO convention 1 • ILO recommendation 116

2.8 Wages

Requirements	Reference
<ul style="list-style-type: none"> • respect the right of staff to a living wage and ensure the wage paid for a standard working week always corresponds to legal standards or to minimum industrial standards and that it is always enough to satisfy the staff's primary needs, as well as provide some discretionary gain. • not withhold amounts for disciplinary purposes and in any case specify the reasons for any amounts withheld from the pay packet; exceptions to this rule only apply when both the following conditions exist: <ul style="list-style-type: none"> - amounts withheld from wages for disciplinary purposes are allowed by national laws - an agreement is in effect deriving from free collective bargaining • make sure the composition of wages and benefits is clearly and regularly detailed in writing for each pay period and clearly for the benefit of employees • make sure wages and benefits are provided in full compliance with applicable laws and that wages are paid in a manner agreed with the employee so that no additional costs are involved as regards payment • make sure no 'labour-only' contractual arrangements, short-term consecutive contracts, and/or bogus apprenticeship schemes are entered into aimed at avoiding the fulfilment of the company's obligations to staff under applicable labour and social security legislation; apprenticeship contracts must be time-limited and include a clearly defined training programme • make sure all overtime work is reimbursed with a premium as defined by national law 	<p>ILO reference conventions and recommendations:</p> <ul style="list-style-type: none"> • ILO convention 100 • ILO convention 102 • ILO convention 131

It also undertakes to:

- Collaborate with the Salcef Group in promoting and monitoring responsible corporate behaviour, accepting any inspections (audit) of its operating facilities by the Salcef Group, according to procedures to be agreed.
- Promptly and fully inform the Salcef Group of any business relationships with other suppliers/sub-contractors and sub-suppliers.
- Implement upgrade actions wherever necessary



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