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**LIST OF REVISIONS / APPROVALS**

Revision	dated	Updates compared to the previous version	Drafted	Approved
0	17.01.18	First issue	L. Platini	E. Riva
01	27/09/2022	Layout update	L. Platini	F. Landi
02	01/02/2024	Whistleblowing Policy update	L.Platini	F.Landi

Corporate social responsibility is, in economic and financial jargon, the area concerning the [ethical](#) implications

within the strategic vision of the [company](#): it is a manifestation of the will of the large, small and medium-sized enterprises to effectively manage issues of social and ethical impact within them and in their areas of activity. [Wikipedia]

OFFICINE RIVA S.P.A. is committed to creating value for all its stakeholders. The principles of sustainable development (value creation, sustainable environmental performance and corporate social responsibility) are an integral part of our corporate strategy.

Our approach to sustainable development also includes the collaborative relationship with our suppliers

## ***CODE OF ETHICS***

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A. OFFICINE RIVA S.P.A. is committed to complying with the fundamental rights of workers recognised at international level. The contents of this code represent the policy of OFFICINE RIVA S.P.A. on the subject of social responsibility. Full compliance with the Code by Suppliers constitutes the essential requirement for the establishment, consolidation and continuation of working relationships with OFFICINE RIVA S.P.A.

B. OFFICINE RIVA S.P.A. itself undertakes to comply with the principles expressed in this Code of Ethics and expects the Organisation to share them equally. OFFICINE RIVA S.P.A. requires that the Organisation subject to this Code of Ethics ensures that subcontractors in turn comply with the provisions of this Code. This Code of Ethics is therefore available to all our suppliers, in order to strengthen mutual understanding of how sustainability can be put into practice in everyday activities.

C. OFFICINE RIVA S.P.A. with the aim of evaluating the Organisation's compliance with this Code of Ethics and applicable laws, it may request any information suitable for this purpose, furthermore it reserves the right to carry out inspections by OFFICINE RIVA S.P.A. personnel or independent auditing companies, appointed by OFFICINE RIVA S.P.A. to act on their own behalf. The inspection personnel must have free access to the premises and systems, as well as being able to have confidential conversations with the workers at their discretion.

D. OFFICINE RIVA S.P.A. will distribute to the Organisation a copy of this Code of Ethics in Italian. The Organisation is asked to ensure that this Code of Ethics, translated into the local language, is disclosed to all workers, who must read it this Code of Ethics.

E. This Code of Ethics will be governed and interpreted according to Italian laws.

F. To meet its social responsibilities, the Organisation is required to conduct its activities in an ethically correct manner and to act with integrity. The ethical requirements include the following aspects:

### **1. Child labour**

**1.1.** The Organisation must not use or support child labour: no person under the age established by the National Regulations for the completion of compulsory school education (and in any case no person under 16 years of age) must be taken on by any organisation. If the National Regulation provides for a minimum age of 14 years in compliance with the exceptions provided for developing countries that adhere to ILO Convention 138, the age of 16 years still applies.

**1.2.** Compulsory/forced labour and disciplinary practices

**1.3.** The Organisation must not favour or use forced/slavery labour practices in any way.

**1.4.** The Organisation must not resort to any form of slavery.

**1.5.** No worker employed by any Organisation must be subjected to corporal disciplinary measures, mental or physical coercion, verbal abuse.

**1.6.** The Organisation undertakes to maintain an open and constructive dialogue with its employees and trade union representatives. In compliance with current laws, the Organisation undertakes to respect the rights of its employees to freely associate, join the union, have representatives, join workers' councils and participate in collective bargaining. The Organisation undertakes not to disadvantage employees who act as workers' representatives.

## 2. Salaries, benefits and working hours

- 2.1 All salary levels of all categories of workers employed by the Organisation will not be lower than the minimum levels prescribed by the National Regulations and by the Collective Agreements signed by the Organisation with the trade union associations representing their workers.
- 2.2 The overtime work of the workers employed by the Organisation must be voluntary, must not exceed the maximum limits established by the National Regulations and must be paid according to percentages that are not lower than the percentages established by the National Regulations and by the Collective Agreements signed by the Organisation with the union provisions who represent their workers.
- 2.3 The working hours of the Organisation's employees cannot exceed the maximum limit indicated by current laws. The remuneration paid to employees must comply with current national legislation on wages and must ensure an adequate standard of living. Unless otherwise specified by local law, deductions from base pay are not permitted as a disciplinary measure (this does not exclude the right to claim Damages on a contractual or statutory basis). The Organisation's employees must be paid punctually. The Organisation is recommended to provide its employees with adequate training and educational opportunities.
- 2.4 Workers employed by the Organisation must be allowed to take rest periods as established by National Regulations.
- 2.5 Workers employed by the Organisation must be allowed to take annual holidays, sick leave, maternity leave and any other form of leave provided for by National Regulations and, if more advantageous for the workers, by individual employment contracts and/or Contracts Collective agreements signed by the Organisation with the trade union associations representing their workers.

## 3. Health & Safety

- 3.1 The workers employed by the Organisation must operate in a safe and hygienic working environment according to the parameters set by National Regulations.
- 3.2 All services and equipment for safety and health in all rooms used by workers throughout the Organisation must comply with the parameters set by National Regulations and workers must be trained in their correct use.
- 3.3 The safety systems of the machinery must be introduced and used by the Organisation and must respect the parameters set by the National Regulations and the workers must be trained in their correct use.
- 3.4 The Organisation must reserve one or more suitable areas for its workers for meals and breaks. These environments must comply with National Regulations.
- 3.5 All rooms used by the Organisation's workers must comply with fire prevention regulations and be equipped with adequate and well-identified emergency exits; they must be ventilated, lit and have sanitary facilities compliant, without exception, with National Regulations.
- 3.6 Medical assistance must be made available to the Organisation's workers in case of emergencies and the workers responsible for providing such medical assistance must be trained in first aid procedures.
- 3.7 An emergency evacuation programme must be drawn up and must be periodically tested in all rooms used by the Organisation.
- 3.8 For all dangerous substances, the Organisation will make material safety data sheets available, containing all the necessary and relevant information on safety.
- 3.9 The Organisation is required to adopt safety programmes to manage and maintain all production and service delivery processes in compliance with applicable safety standards. The Organisation is required to address issues relating to products and their potential impact during all stages of the production process. For dangerous plants, the supplier undertakes to carry out specific risk analyses and to implement measures that prevent the occurrence of accidents, such as leaks of chemical substances into the environment and/or explosions.

## 4. Discrimination

- 4.1 No worker employed by the Organisation must be subject to discrimination for any reason relating to race, class, age, national origin, ethnicity, sex, disability, language, religion, trade union association to which they

belong.

## 5. Labour unions

- 5.1 The workers employed by the Organisation have the freedom to form trade union associations that are recognised by National Regulations and participate in them. The appointed representatives of these trade union associations have the freedom to present negotiating proposals on issues relating to the rights and working conditions of workers, in the manner and to the extent envisaged by National Regulations.
- 5.2 Trade unions, which are recognised by National Legislation, have the freedom to enter into Collective Agreements on behalf of the workers they represent, in accordance with National Legislation.

## 6. Environment

- 6.1 The Organisation must operate in compliance with any environmental contractual conditions defined.
- 6.2 The Organisation must operate in compliance with national environmental legislation; in particular, as regards the following aspects: emissions, water discharges, waste, soil and subsoil, refrigerant gases, management must comply with the applicable national legislation. In any case, the company's activities must not create environmental damage.
- 6.3 Substances considered extremely dangerous (e.g. carcinogenic, mutagenic, toxic for reproduction) must not be used in the production cycle, or if they are used, adequate precautions must be adopted, that must be compliant with what is required by national environmental legislation.
- 6.4 The products supplied by the Organisation must comply with applicable national and international legislation, in particular the European regulation no. 1907/2006 (REACH) and subsequent amendments and additions.
- 6.5 The Organisation must have assessed the environmental emergencies that could occur (e.g. fire, spillage of substances with the possibility of polluting the soil or water, etc.) and has defined adequate emergency procedures to manage such risks.
- 6.6 The Organisation must have assessed its greenhouse gas emissions and, if these are significant, must have adopted systems and programmes aimed at containing them.
- 6.7 The Organisation is required to ensure that the handling, preservation, recycling, reuse of materials or management of waste, atmospheric emissions and waste water occur safely. All such activities that have potential adverse effects on the health of people or the environment must be appropriately managed, measured, controlled and treated before releasing any substance into the environment. The Organisation is required to set up systems for the prevention or containment of accidental spills and release of substances into the environment.

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This Code of Ethics applies to all stakeholders having relationships with OFFICINE RIVA S.P.A. and is communicated to existing and potential Organisations. As part of the qualification process, it is necessary to ensure that the new Organisations comply with the provisions contained in this document.

OFFICINE RIVA S.P.A. can verify the presence of risks through self-assessments, fact-finding or audits, as dictated by the Quality functions or local or headquarters representatives. OFFICINE RIVA S.P.A. provides the Organisation with indications on how to meet its expectations and informs it on the assessment methods.

If an Organisation does not meet our requirements, it will have to adopt corrective plans within an established deadline (which will depend on the seriousness of the issue) and OFFICINE RIVA S.P.A. will monitor its progress.

OFFICINE RIVA S.P.A. can support the Organisation in developing their potential and improving their performance. OFFICINE RIVA S.P.A. has the right to terminate a working relationship with the Organisation that repeatedly and knowingly violates this Code of Ethics and refuses to adopt improvement plans. OFFICINE RIVA S.P.A. in the tender phase reserves the right to exclude Organisations that do not comply with local, national or international regulations or provisions.

OFFICINE RIVA S.P.A. is committed to transparency and dialogue with stakeholders. We track and record the results of our sustainable purchasing process using a methodology that applies to all purchasing functions within the Group. In their supply chain the Organisation is required to communicate and promote the application of the same principles set out in this document.

