



**BRANDART**  
BRAND PACKAGING AND DISPLAY



# SUPPLIERS CODE OF CONDUCT

## INTRODUCTION

Brandart has been committed, through the adoption of the most appropriate measures of prevention and control the strict observance of laws and regulations in any context in which it operates at all levels of decision-making and operational. Brandart believes that ethics, integrity, transparency and commitment are the basis and the foundation to build success. All employees and collaborators must undertake to achieve these objectives during carrying out their functions, and also as part of their responsibilities. Fundamental importance for Brandart is the compliance with this Code of Conduct by employees, contractors, consultants and general contractual counterparties. To the compliance with this Code of Conduct are subordinated the integrity and reputation of Brandart, which are all crucial for success enterprise.

This Code on Conduct is applicable to any of our supplier having its activity outside Italy. The Code of Conduct identifies and defines not only the responsibility of the individual recipients of its precepts, but also general standards of conduct that Brandart as a whole has to follow, such as, in particular:

- I. Legality
- II. Fairness and equality
- III. Integrity and professional integrity
- IV. Transparency and diligence
- V. Impartiality
- VI. Fair competition
- VII. Prevention of conflicts of interest
- VIII. Confidentiality
- IX. The protection of the person
- X. The protection of health and the health of the work environment
- XI. Environmental Protection
- XII. Innovation and research

We expect our third party suppliers to respect and adhere to the same philosophy in the management of their own companies.

We require strict compliance with this standard on part of all our suppliers, their factories, subcontractors, as well as their own suppliers.

Please note that where national and other applicable laws and Supplier's Code of Conduct address the same issue, the provision is to apply that the top workplace standard.

Further, where the Supplier's Code of Conduct is in contradiction with the applicable law, the applicable law shall be applied.

Our goal to work with the suppliers that agree to comply with the requirements of this Code of Conduct that also abides by the principles stipulated in the Conventions of the International Labour Organization, the Universal Declaration on Human Rights, the guiding principles of the OECD and the principles of the Global Compact. Any breach of conduct or any violation of this Code of Conduct by our suppliers or their subcontractors will be translated in possible termination of the business relationship.



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## CORPORATE SOCIAL RESPONSIBILITY REQUIREMENTS

Regarding the criteria of legality, fairness and equality, impartiality, the protection of the person, the protection of health and the health of the work environment, will invite suppliers to comply with the provisions below.

**Working Hours:** In relation to working hours and overtime, our suppliers shall comply with the limits set by the laws of the country of manufacture, and at least grant one day off in every seven-day period.

**Freedom of Association and right to Collective Bargaining:** We expect our suppliers to respect and recognize the rights of each employee to negotiate collectively, to create or join the union organization of their choice and without penalty, discrimination or harassment.

**Discrimination:** We expect our suppliers to treat all employees equally and fairly. Our suppliers may not practice any kind of discrimination in relation to hiring, equality of remuneration access to training, promotion, benefits or dismissal based on gender, race, religion, age, disability, sexual orientation, political opinions, nationality, or social or ethnic origin.

**Wages and Benefits:** As a minimum, our suppliers must pay regular wages and pay for overtime at the legal rate imposed by the country of original manufacture and provide their workers with the benefits the law currently requires. If there is no legal minimum wage or overtime pay in the country of origin, the supplier shall ensure that the wages are at least equal to the average minimum in the industrial sector in question and that overtime pay is at least the same as the usual rate of pay. Deductions from wages are not to be made for disciplinary purposes.

**Forced Labor:** The use of forced labor by our suppliers, whether obtained under the threat of punishment, withholding identity papers, requiring workers to deposit a band or any other constraint is strictly prohibited.

**Child Labor:** Work by children under the age of 16 is strictly prohibited. In countries where local laws set a higher age for child labor or impose mandatory education beyond the age of 16, this higher age will be applied.

**Young workers:** An employee younger than age 18 is consider young worker. Suppliers shall not expose young workers to any situations, which are hazardous or unsafe to their physical and mental health and development. Young workers may not work during night hours.

**Disciplinary practices:** We expect our suppliers to treat their employees with respect and dignity. Our suppliers may not allow or engage in any kind of corporal punishment, psychological or physical harassment or any other kind of abuse.

**Environmental, Health and Safety:** We expect our suppliers to comply with all applicable EHS laws and regulation; to have written environmental, safety and health policies and standard, to implement a system to minimize negative impacts on the environment, to reduce work-related injury and illness, to promote the general health of employees. Focused on Brandart supply chain CSR status, the following items have been listed out, but not limited to the contents:

- a) Construction buildings' fire fighting
- b) Chemical control
- c) PPE



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- d) Machine safety
- e) Electrical safety
- f) Indoor air condition
- g) Waste water discharge
- h) Noise
- i) Hazardous waste control

## ENVIRONMENTAL HEALTH AND SAFETY

Management System: we expect our suppliers to establish and implement documented CSR system. Both long term and short term strategies have to be implemented and monitored well. Adequate resources have to be provided to assure the CSR system effective implementation. Through training and communication, internal audit and management, to assure the system could be continually and steadily improved.

## WORKING METHODS

Regarding the criteria of legality, integrity and professional integrity, transparency and diligence, and fair competition, we require the suppliers to comply with the provisions below.

**Legal Requirements:** We expect our suppliers to act in full compliance with the laws. Our suppliers shall abide by all national, local and international laws relating to the management of their businesses.

**Customs and Security Authorities:** Our suppliers shall comply with applicable customs laws, including those relating to importing and exporting and the ban on the transshipment of merchandise into the country of import and export.

**Subcontractors:** Our suppliers must receive Brandart approval before subcontracting any part of the manufacturing process. Our approval is subject to acceptance by the subcontractors of this Code of Conduct and all other applicable conditions.

**Brand protection, mold and printing tool management:** It is strictly prohibited to subcontract the logo printing that has to be realized in the production site of our suppliers. It is strictly prohibited to subcontract any branded component or semi finished part of the product. Our suppliers are authorized to print the logo according to the brand authorization that will be sent by Brandart and according to the purchase orders quantity. Any eventual defective quantity must be destroyed at the presence of Brandart or certified by a Third Party accredited by Brandart. Our supplier must grant a safe custody of any mold, logo printing tool, drawings, graphic files, sketches keeping an update stock record.

Eventual exceeding quantity respect the purchase order quantity must be communicated in written to Brandart purchase department who will instruct how to manage.

**Anti-Corruption:** Our suppliers shall agree to condemn and act against corruption in all its forms, including extortion and kickbacks. No one of Brandart supplier must, directly and indirectly promise or pay sums of money or other benefits, except for normal commercial practice or courtesy, not tolerated in any form corruptive towards employees Brandart.



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## PREVENTION OF CONFLICTS OF INTEREST AND CONFIDENTIALITY

Brandart Providers are required to strictly observe the laws on privacy and insider trading.

In addition of what they legally and/or contractually permitted, providers must not use, disclose or disseminate any news or information learned about the company. It is understood that every news or information are to be considered unconditionally reserved and commercial/industrial secrets. Any news/information /corporate document objectively reserved or even identified as such by Brandart, acquired with the occasion of the relations, is object to the law on privacy and insider trading and to this Code of Conduct.

## INSPECTION AND AUDIT

**Inspection:** We reserve the right to check adherence to these principles and to conduct compliance audits at any time without notice. Our suppliers shall supply the necessary information and grant access to our representatives who seek to verify compliance with the requirements of this code. They shall agree to improve and correct any deficiency discovered.

**Access to information:** The supplier shall keep proper records to prove compliance with this Code of Conduct. Our suppliers shall provide access to complete, original, and accurate files to our representatives.



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### ACCEPTANCE DECLARATION

Dear Supplier,

Brandart has agreed to respect the moral and ethical values in the management of the company. We expect our suppliers to respect and adhere to the same philosophy in their own companies management. It is Brandart intention to continue to maintain close cooperation with all its suppliers in order to ensure that agreed quality standards and social compliance are completely reached.

Therefore, the CEO or General Manager of your company is invited to fill the below information, sign this letter and return it to Brandart, this confirming the understanding of the content of this Code of Conduct and the agreement to undertake its obligations.

Any breach of this Code by you or your subcontractors will result in a review and possible termination of the business relationship.

Brandart requires all its suppliers to comply with the social responsibility requirements set out in chapters from 1 to 8 of the international standard SA 8000, available at <http://www.sa-intl.org>. We invite you to read them.

Company: \_\_\_\_\_

Date: \_\_\_\_\_

Name and title of the supplier representative: \_\_\_\_\_

Company stamp and signature: \_\_\_\_\_