



Molino Dallagiovanna GRV srl

CODE OF ETHICS

REV. 0
April 2016

To all Suppliers

The Molino Dallagiovanna intends adopting a Code of Ethics on the basis of the attention and respect for the legality which guides our choices and which has prompted us to adopt a system that integrates, personalizes and promotes conformity without weighing heavily on the organization.

All suppliers of the Molino Dallagiovanna are asked to respect the Universal Declaration of Human Rights, the UN Convention on the Rights of the Child, the International Agreement on Civil and Political Rights, the Recommendations of the International Labour Organisation (ILO), the European Directives (EEC Directives) and local regulations on workers' rights, as well as prevalent industry standards or other standards followed by the company regarding workers' and community rights.

In the event of the aforementioned national and international regulations/standards referring to the same subject, the standard most favourable to workers must be applied.

We hereby ask you to undertake to respect and adopt such points. This document can be faxed back to us at 0523 787450 or sent by email to quality@dallagiovanna.it

Date of Acceptance of this Code of Ethics _____

Stamp and signature in acceptance



1. CHILD LABOUR

The aim is to protect the right of all children to be protected and to ensure the basic conditions that allow them to lead an economically and socially dignified life.

- Do not employ child labour in the manufacture of any product or in the provision of any service, where by child labour is meant the labour of persons under the age of 16 who are unable to attend compulsory school and/or conduct an existence fit for them
- Ensure young people working conditions suitable for learning, growing up and developing professionally, as well as adequate health and safety and training conditions

This means respecting:

- 1) ILO Conventions 138, ILO 182, Recommendation 146, United Nations Convention on the Rights of the Child
- 2) Italian law 977/67 as amended by Legislative Decree 345/99 supplemented by Legislative Decree 262/00, Legislative Decree 276/2003, Law 451/94, Legislative Decree 2007 (296/2006)

2.FORCED LABOUR

The aim is not to use clandestine work, and to ensure, in compliance with the law, both the use of workers' permits and freedom of movement

- Do not employ non-voluntary staff (detainees, insolvent persons) who are subject to unlawful restrictions of their freedom to interrupt their work engagement (seizure of documents, salaries not paid and kept in custody), not protected by any form of contract

This means respecting:

- 1) ILO Conventions 29, ILO 105
- 2) the Italian laws 300/70, 108/90, 297/82 as amended by 96/2006, Legislative Decree 152/97 and the Workers' Statute

3.HEALTH AND SAFETY

To provide a safe and healthy work environment

- To provide employees with a safe and healthy work environment with adequate services, instruments of control and protection from risk materials and situations, in compliance with applicable regulations
- If canteens and houses are provided to employees, these must be healthy, safe and in compliance with local regulations on environmental safety

This means respecting:

- 1) the ILO 155 Convention, Recommendation 164



2) the Italian laws Leg. Decree 81/08 as supplemented by Leg. Decree 106/2009, Law 638/83, Leg. Decree 493/96 More specifically, abiding by the contents of Leg. Decree 81/2008 or equivalent legislation, means carefully carrying out an analysis of the risks associated with the work activity and place of work, applying prevention measures (including the mandatory use of PPE), providing all workers with adequate training, implementing all health protocols, taking corrective measures following indications of internal personnel or external entities.

4. FREEDOM OF ASSOCIATION & RIGHT TO COLLECTIVE BARGAINING

- Leaving the workers free to associate, if they so wish, and to publicly bargain in accordance with the law, without fear of interference or limitations

This means respecting:

- 1) the Conventions ILO 87, ILO 135, ILO 98
- 2) the Italian laws 300/70, the inter-federal Agreement for the setting up of unitary union Representatives 20/12/93, Workers' statute

The union must be provided with freedom of association without any pressure being put on its members, without discriminating employees engaged in their duties and growth processes, recognising the elected representatives as privileged interlocutors, and providing them with the places and the time to carry on union activities according to applicable regulations.

5. DISCRIMINATION

- Not to make use of or give support to any form of discrimination as regards employment, retribution, access to training, promotion, termination of employment contract or retirement, according to race, national, territorial or social origin, cast, birth, religion, disability, genre, sexual orientation, family responsibilities, civil status, union membership, political opinions, age, or any other condition which could give rise to discrimination.

This means respecting:

- 1) the Conventions ILO 111, ILO 100, ILO 159, ILO 183, the ILO Code of Conduct on AIDS in places of work, the Convention of the United Nations on the elimination of all forms of discrimination against women, the Convention of the United Nations on the elimination of all forms of racial discrimination
- 2) the legislation 903/77, 108/90, 125/91, 189/2002, 53/2000, Leg. Decree 151/01, Constitution of the Italian Republic and Workers' Statute (Law 300/70)

To select workers according to abilities and skills. To treat all workers in the same way, offering them equal possibilities and conditions.

6. DISCIPLINARY MEASURES

- To treat all workers inside and outside the company, with dignity and respect, strictly excluding the use of every type of unusual and/or bodily disciplinary practices.
- To make known in the company criteria or regulations in use for the administration of disciplinary practices, which must be in compliance with all applicable local laws and the regulations applying to workers

This means respecting:

- the ILO 29 Convention, Italian law 108/90, Leg. Decree 758/94



Attention must be given to avoiding any “mobbing”, not using unfavourable work conditions as “ways of punishment”, not adopting disciplinary practices in a hurried and simplistic way.

7. WORKING HOURS

- Working hours must be those laid down in the national contract for the category of worker
- Overtime must always be agreed and not systematic and as regards the number of hours must comply with the contract for the category
- All employees must in any case benefit from one day of rest every seven

This means respecting:

- 1) the ILO 1 Convention, Recommendation 116
- 2) the Italian laws 877/1973, 300/70, 196/97, 409/98 and the Workers' Statute, Leg. Decree 66/2003

This means ensuring compliance with the provisions of the work contract of reference

8. WAGES

- Workers must be provided with wages in conformity with all applicable local laws in this regard, including that determining the minimum wage, and which allows them to live in a dignified way

This means respecting:

- 1) the Conventions ILO 100, ILO 131, ILO 102
- 2) the Italian laws 368/2001, 300/70, 297/82, L296/2006, 863/84, Constitution of the Italian Republic and Workers' Statute

9. MANAGEMENT SYSTEM

The company, as a result of the acceptance of the MOLINO DALLAGIOVANNA ETHICAL PROJECT, gradually undertakes to:

- Extend its participation in the project and its knowledge of the requirements of the standard to its suppliers of goods and services, and to its sub-suppliers, with the aim of developing culture and attention for topics of corporate Social Responsibility
- Carefully and completely record all the suppliers with which it interacts on a continuative basis, in order to strengthen control on the entire supply chain
- Take all remedial measures with its suppliers which become necessary due to breach of the requirements of this Code of Ethics