

ETHICAL CODE

Rev. 0 of 01/02/19

PRELIMINARY REMARKS

The ethical code was written by Nuova IMPALA as a tool to raise employees' awareness of ethics and sustainability and to promote their commitment.

The aim of the code is to spread the culture of quality, environment, health, safety, and ethics in the business activities at any level and in the relationships among individuals for the defence of the free initiative.

In the course of its activity, the Nuova IMPALA tannery considers the requirements, rights and obligations of the parties involved by acting with loyalty, diligence, personal correctness and fair trade, confidentiality and in compliance with all of applicable law provisions.

1. CHILD LABOUR

1.1 Nuova IMPALA does not use or support the exploitation of child labour (carried out by persons under the age of 16).

1.2 In particular, Nuova IMPALA protects minors from situations that are potentially dangerous, risky or harmful to human health, both inside and outside the workplace, in compliance with the provisions of the applicable law.

2. FORCED LABOUR

2.1 Nuova IMPALA does not use nor support forced labour and does not request the personnel to leave deposits or identity documents at the start of employment. Labour is considered forced when each work or service is obtained under the threat of a penalty or that the person has not offered to do voluntarily or is required as payment of a debt.

3. HEALTH AND SAFETY

3.1 Nuova IMPALA ensures a safe and healthy workplace and to take appropriate measures to prevent accidents and damage to health that may occur during the work or as a result of it.

3.2 Nuova IMPALA appointed a management representative in charge of the implementation of the safety and health factors in the workplace.

3.3 Nuova IMPALA ensures the personnel an adequate and documented training on health and safety and verify its effectiveness. Such training is repeated for newly hired personnel.

4. ENVIRONMENT

4.1 In the course of its activity, Nuova IMPALA checks the environmental effects related to processing.

5. ASSOCIATION AND BARGAINING

5.1 Nuova IMPALA acknowledges the free trade union association and the right to collective bargaining, as well as the right to strike.

6. DISCRIMINATION

6.1 Nuova IMPALA does not implement any discrimination in hiring, remuneration, access to training, promotion, termination or retirement, based on gender, race, national origin, invalidity, religion, social class, sexual orientation, trade union membership, political affiliation, age.

7. WORKING TIME

7.1 Nuova IMPALA complies with the law and the provisions of the applicable National Collective Employment Contract on working time.

8. REMUNERATION

8.1 Nuova IMPALA grants a remuneration corresponding to the law standards and the minimum parameters set forth in the National Collective Employment Contract and in the applicable one.

8.2 Nuova IMPALA ensures that the composition of the remuneration and the indemnities is indicated clearly and regularly.

9. PROFESSIONALISM AND BUSINESS ETHICS

9.1 Nuova IMPALA adheres to principles of loyalty, fairness and transparency in personnel hiring, behaves with justice towards its collaborators and promotes their professional growth.

9.2 Nuova IMPALA behaves with justice and moral and commercial fairness towards purchasers, suppliers, sub-suppliers, competitors. In particular, it undertakes not to generate unfair competition aimed at causing material and/or non-material damage that might compromise the principles that this document refers to.

9.3 Nuova IMPALA maintains relations based on fairness and loyalty with Institutions.

9.4 Nuova IMPALA notifies and informs the market in a true, correct manner and takes full responsibility thereof.

9.5 Nuova IMPALA respects the trade secret and the rights of industrial property of the purchaser by granting confidentiality.

9.6 Nuova IMPALA does not operate in areas involving activity against fundamental rights of men or against rights of workers.

9.7 Nuova IMPALA grants professionalism and quality in providing its service.

10. MANAGEMENT

10.1 Nuova IMPALA undertakes to notify all personnel and involved parties of adoption of this Ethical Code and to make its content available.

10.2 Nuova IMPALA keeps adequate objective evidences stating the compliance with the requirements of this document.

10.3 Nuova IMPALA, in case of pending disputes on subjects of this document and for their resolution, manages them with corrective actions.

This Ethical Code has been given to employees, is available in the company's notice board and posted on the company's internet site www.nuovaimpala.com.