

SUPPLIERS CODE OF CONDUCT

INTRODUCTION

Pollini Spa (hereinafter also “Pollini”) adopts the principles of integrity, legality, and transparency, in full compliance with the applicable legislative and regulatory requirements, as well as with the Universal Declaration of Human Rights, the fundamental Conventions of the International Labor Organization (ILO), and the ILO Declaration on Fundamental Principles and Rights at Work.

For this reason, Pollini is only willing to commence and maintain relations with commercial partners (hereinafter also “Suppliers”) that share the commitment of the Company to follow practices and procedures consistent with such principles, and compliant with the minimum standards specified in this Suppliers Code of Conduct (hereinafter also the “Code”) for the support of workers’ rights and the promotion of their wellbeing. Partners must also share our commitment to respect the environment in full and take all possible action to reduce adverse impacts of every kind, including by the reduction of waste and the responsible use of resources, in order to tackle current and future changes and challenges, and guarantee sustainable development over the long term.

Accordingly, the objective of this Code is to define the ethical and environmental standards applicable to the commercial partners of the Company, even when the relevant regulations are less demanding. In the event of differences or conflicts with such standards, Suppliers are required to comply with the highest applicable standard.

SCOPE OF APPLICATION

This Suppliers Code of Conduct applies to partners that supply goods (including but not limited to raw materials, accessories and products developed and/or commercialized by Pollini) and/or provide services to Pollini.

Respect for the principles and standards contained in this Code is a necessary condition for commencing and/or maintaining a commercial relationship with the Company. This is assessed continuously by Pollini, which monitors both ethical and environmental performances of all Suppliers.

Additionally, and in turn, Suppliers must also ensure respect for all the requirements of this Code by every sub-supplier used in the context of their commercial relations with the Company, being responsible in full for any omissions or infringements of the Code by such sub-suppliers.

A sub-supplier is any supplier of products or services that participates in the Pollini supply chain at any level.

WORKING RELATIONSHIPS

Suppliers must adopt conditions of work and employment that are not detrimental to workers and that safeguard their rights pursuant to the domestic and international laws and regulations that govern work, social security, and retirements.

DISCRIMINATION, RESPECT AND DIGNITY

In the context of each working relationship, workers must not suffer any kind of discrimination about their selection, hiring, compensation, promotion, disciplinary action, dismissal, or retirement, whether based on gender, race, ethnic origin, religion, age, disability, sexual orientation, geographical origin, political opinions, or social group.

Each worker must be treated with respect and dignity and must not suffer any type of physical, sexual, psychological, or verbal harassment or violence.

FORCED LABOR

Suppliers must never use forced labor in any way or under any circumstances, including prison labor, debt slavery, work performed under duress, or any other type of forced labor.

CHILD LABOR

Suppliers must never hire or otherwise employ any persons under the age of 15 or, in any case, under the legal age for the completion of compulsory education.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Suppliers must recognize and respect the rights of workers to freedom of association and to collective bargaining.

HEALTH AND SAFETY

Suppliers must guarantee a safe and healthy working environment, in order to prevent accidents and injuries at work or consequent to the work performed.

WORKING HOURS

Suppliers must respect the working hours envisaged in the relevant domestic legislation. The normal working week must not exceed 48 hours. Suppliers must also allow workers to rest for at least 24 consecutive hours every 7 days. Overtime work must not be standard practice or obligatory, but be voluntary and optional, and remunerated with a premium. Suppliers must not require more than 60 hours to be worked in any given week, considering both normal and overtime hours, unless in truly exceptional circumstances.

COMPENSATION

All workers are entitled to compensation for each week or month worked that is sufficient to cover at least their primary needs. Suppliers must pay each employee the minimum wage or that recognized as appropriate for the sector and the country in which the work is performed, whichever is higher. Suppliers must also comply with all legal requirements governing compensation and, at the same time, provide the ancillary benefits envisaged by law or contract. Where compensation is below the minimum level and insufficient to cover both the essential needs of workers and provide disposable income, the Suppliers concerned must, in collaboration with Pollini, take appropriate gradual steps to reach a satisfactory level of compensation.

PROCUREMENT AND SUB-CONTRACTING

All sources for the procurement of goods (raw materials, accessories, semi-finished and finished products, etc.) must be compliant with this Code. Pollini does not allow sub-contracting without prior written consent.

ENVIRONMENT, BIODIVERSITY AND ANIMAL WELFARE

Suppliers must respect all applicable environmental laws and, where required, maintain written environmental policies and procedures.

Suppliers agree to the monitoring of their environmental and social responsibilities, either separately or together.

Suppliers must also strive to adopt all possible measures to reduce the adverse environmental impacts of their activities.

Suppliers are invited to measure the greenhouse gas emissions associated with their activities, as well as their water consumption and the quantity and destination of the waste generated. Pollini expects Suppliers to implement emission reduction plans via energy efficiency and self-generation initiatives and/or the purchase of renewable energy, as well as plans to reduce water consumption via water-recycling initiatives and plans to reduce waste generation and minimize the quantity of waste sent for disposal.

Suppliers share the commitment of Pollini to protect the environment and biodiversity and respect the domestic and international standards that safeguard the wellbeing and dignity of animals.

Suppliers of raw materials must guarantee their traceability, ensuring that the preservation of biodiversity and respect for animal welfare extend throughout the entire up-stream supply chain.

COMMUNITY

Pollini encourages all Suppliers and their employees to participate in charitable initiatives that benefit the local community and environment, volunteering their time and/or providing other types of support.

MONITORING OF COMPLIANCE

Pollini reserves the right to carry out on-site or remote inspections, even without notice, in order to check compliance with this Code by Suppliers and/or their respective sub-suppliers.

Accordingly, they must guarantee full access to their facilities by Pollini, so that documents can be examined, photographs taken and private personal interviews with management and employees recorded and retained, including those conducted with persons indirectly involved in activities linked to the facilities concerned, such as canteen, security, and cleaning personnel.

Suppliers must retain all documentation on site, making it available for consultation, so that their compliance with this Code can be checked.

Suppliers guarantee compliance with this Suppliers Code of Conduct by their sub-suppliers. Given this, during inspections, Pollini will check that Suppliers in turn monitor their respective sub-suppliers by requesting specific documentation confirming authorizations to carry out their activities, the suitability of their premises, the payment of social security and pension contributions and taxes for and on behalf of their employees, and the reported results of any internal audit work performed.

If such inspections reveal non-conformities, Suppliers agree to formalize and implement the corrective actions needed to remedy them. Pollini agrees, in a spirit of continuous improvement, to assist Suppliers with the specification and implementation of such corrective actions. Pollini reserves the right to terminate all relations with Suppliers that do not comply with this Code or fail to implement the corrective actions needed to remedy any non-conformities identified.

WHISTLEBLOWING AND COMMUNICATIONS

Anyone who believes that this Code has been infringed may contact Pollini at the following e-mail address: whistleblowing.pollini@pollini.com. All such communications will be kept strictly confidential. When managing whistleblowing reports, Pollini will protect reporters from reprisals of any kind and Suppliers must also do the same in relation to any of their employees who, in good faith, report events deemed to be improper.

Suppliers must inform their employees about the contents of this Suppliers Code of Conduct. Pollini requires Suppliers to confirm with adequate documentation that they have shared the principles and values expressed in this Code with the recipients concerned.

Suggestions, opinions, and comments about this Code may be submitted to the following e-mail address:
sustainability@aeffe.com.

Suppliers Code of Conduct - POLLINI Spa (Aeffe Group – V.08.2023)

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