



ETHICAL POLICY

I.M.C.A. S.p.A. has always been committed to establishing a culture of openness, respect in business practices regardless social and cultural contexts. Not only is I.M.C.A. compliant to the enforcement of laws but also has always paid attention to the employees' needs to set up an ethical context in the work place and a process of self-regulation of environmental and social nature.

I.M.C.A. S.p.A. involves in this challenge its suppliers of raw materials to fight the phenomenon of the illegal hiring by adopting sustainability protocols of work and purchasing raw materials from only the best approved suppliers who, most of them, are certified GRASP. Our suppliers are required to adhere to the Code of Conduct for good practice based on the Ethical Trade Initiative and to our policies. The commitment of the company's ethical policy is confirmed by the internationally recognized SEDEX and SMETA ethical protocols, which are based on health and safety in the workplace.

I.M.C.A. S.p.A. and its suppliers have as a reference point the ETI (**Ethical Trading Initiative**) with the following standards required in terms of working conditions:

- Employment is freely chosen: There is no forced labor and employees are not required to lodge deposits, identity papers and are free to leave.
- Freedom of Association and the right to collective bargaining: Workers should not be discriminated for joining trade unions.
- Health & Safety: to provide a safe and healthy workplace and to take all steps necessary including training staff to remove any potential hazard and arrange clean water, accommodation and facilities where appropriate.
- Not to engage in the use of child labor: All workers must have reached the age of 15, or have reached the minimum legal working age under national law, whichever age is the higher. Workers under the age of 18 must not work at night or under potentially hazardous conditions.
- Living wages should be paid for a standard working week.
- Working hours must not be excessive: not in excess of 48 hour week and at least one day off in every seven. Overtime shall be voluntary and compensated at a premium rate.
- Discrimination: not to engage in discriminatory practices in the employment of personnel because of race, caste, national origin, religion, age, disability, marital status, sexual orientation, union membership or political affiliation; Every employee has an equal opportunity for personal recognition and career development, regardless of personal background or belief. No form of discrimination or harassment will be tolerated. An important part of this policy is recruiting, selecting, rewarding and promoting people on the sole basis of their ability. In return we expect our employees to act with integrity and maintain high ethical standards;
- Regular employment is provided: Work performed must be on the basis of recognized employment and not avoid regulations through other arrangements;
- No harsh or inhumane treatment is allowed no forms of intimidation shall be tolerated either physical, verbal or other. I.M.C.A. S.p.A. enables everyone to work free from discrimination, harassment or bullying of any kind.

I.M.C.A. S.p.A. is currently setting up a rolling programme of inspection to ensure suppliers continue to maintain and improve standards. When audits do identify problems, I.M.C.A. is committed to working with these suppliers to help them to overcome such issues.

Management reviews meeting are regularly held to audit performance and the Ethical Policy will be reviewed annually and action plans set to rectify and monitor any non-conformance.