

## CODE OF CONDUCT OF SDR PACK S.p.A.

### Definitions

The Standard on Working Conditions of SDR PACK S.p.A. explains and defines the Code's requirements.

### Provisions

- **Laws and regulations**

All units and suppliers of SDR PACK S.p.A. Group must operate in full compliance with the relevant laws and regulations that apply to their activities and tasks in the countries where they operate. This is the minimum requirement for all sections of this Code.

- **Suppliers**

All suppliers must comply with the Code of Conduct and the Standard on Working Conditions of SDR PACK S.p.A. Suppliers must ask their own suppliers to comply with the provisions of the Code and of the Standard. When asked, the suppliers of SDR PACK S.p.A. must be able to provide information to SDR PACK S.p.A. on the suppliers they use and must be able to prove that the latter have received and fully understood the provisions of this Code.

Suppliers must ensure that the supply of materials in products, spare parts or components supplied to SDR PACK S.p.A. does not contribute, directly or indirectly, to the violation of human rights in conflict or high-risk areas.

- **Corruption, bribes and company ethics**

SDR PACK S.p.A. Group does not tolerate any form of corruption, bribery or unethical business practices. The units and suppliers of SDR PACK S.p.A. and their employees are in no way authorised to offer, give, request or receive bribes or other types of improper benefits.

- **Child labour**

Child labour is not tolerated in any way and in any form.

Should a child be found to be working at a location where SDR PACK S.p.A. products or components are manufactured, it shall be necessary to take actions in the best interest of the child; it shall also be necessary to implement all



necessary corrective actions to maintain or improve the social situation of the child.

- **Forced labour**

Involuntary, forced or compulsory labour is not tolerated in any way and in any form. This includes bonded, compulsory and non-approved prison labour, and all other forms of labour that do not respect the person's will or freedom of choice.

SDR PACK S.p.A. does not deduct part of the salary, staff documents, allowances in order to oblige the worker to continue to work for the company.

- **Safety provisions**

Safety practices must always be implemented, in full respect of human rights and in compliance with the applicable legislation. The use of force must be avoided to the greatest possible extent.

- **Health and safety**

All employees must be guaranteed a hygienic and safe workplace, complying as a minimum with the provisions of local law. Work units must adopt all provisions regarding the prevention and management of potential accidents and occupational diseases.

SDR PACK S.p.A. complies with the legislation on health and safety (Legislative Decree 81/08 as amended and supplemented).

- **Non-discrimination**

SDR PACK S.p.A. recognises and respects diversity and cultural differences and does not discriminate against personnel with regard to hiring, remuneration, access to training, promotion, termination of the relationship, retirement.

It does not endorse and does not discriminate based on ethnicity, nationality, social class, religious beliefs, disability, gender, sexual orientation, family status and political opinions.

All employees are treated strictly based on their abilities and their qualifications with regard to any decision related to employment, among which: hiring, promotion, remuneration, benefits, training, dismissal and termination of the working relationship.

SDR PACK S.p.A. does not carry out and does not allow any threatening, offensive, sexually coercive behaviour that aims to exploit, such as language, gestures, physical contact in the workplace and in the locations that are related to the work activities (canteen/cloakrooms/accommodation, etc.).

- **Harassment and abuse**

No employee must be subjected to harassment or physical, sexual, psychological or verbal ill-treatment or to intimidation or abuse.



- **Disciplinary actions and complaints**

Disciplinary actions will be implemented in such a way as to guarantee that employees are treated fairly and humanely. No employee must be subjected to corporal punishment.

Instead, progressive disciplinary actions will be implemented. Employees are encouraged to and must report any problems or violations of this Code, without being in any way subjected to reprisals or suffering any other negative consequences.

- **Working hours**

SDR PACK S.p.A. recognises the need for the right balance between working hours and free time for all its employees. As a general rule, employees may not be requested to work for more than 48 hours in a standard working week, or to work for more than 60 hours (including overtime) in a total working week.

With the exception of extraordinary company circumstances, all employees have the right to at least one day of rest every 6 days.

SDR PACK S.p.A. complies with the National Collective Bargaining Agreement and with Trade Union agreements, if any have been signed.

- **Remuneration**

Remuneration, including overtime and benefits, shall equal or exceed the level required by applicable law. In defining the level of remuneration, SDR PACK S.p.A. encourages taking into consideration the necessary cost to meet the needs of the workers and of their families. SDR PACK S.p.A. complies with the National Collective Bargaining Agreement and with Trade Union agreements, if any have been signed.

- **Freedom of association and right of collective bargaining**

All employees are free to exercise their legal right to establish organisations to defend their interests, to associate or refrain from association with such organisations. No employee may be subjected to intimidation or harassment while peacefully exercising these rights.

The employer must also respect the right of workers to collective bargaining.

- **Respect of the environment**

All units must comply with the applicable environmental legislation and the related requirements laid down by SDR PACK S.p.A. A management system that constantly improves the units' environmental standards and results must be put in place. Each unit



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## SDR PACK S.p.A.

Via Segafredo, 6 – 36027 Rosà (VI) Italy

T. +39 0424 581990

F. + 39 0424 858323

Cap. Soc. 1.000.000 Euro i.v.

Cod. fisc. 01447990282

P. Iva 02485550244

Reg. Impr. di VI 01447990282

[www.sdrpack.com](http://www.sdrpack.com) – [info@sdrpack.com](mailto:info@sdrpack.com)

must identify the pertinent environmental aspects and must implement the suitable actions for their management,

including the consumption of resources, emissions, chemical substances and waste.

SDR PACK S.p.A. is guided by the principles of the SA8000 Standard, is certified in accordance with the ISO 9001:2015 and BRC-IoP standards, and, in 2019, aims to be certified in accordance with the ISO 14001:2015 and FSC standards.

- **Monitoring and compliance**

The management is responsible for regular and documented monitoring and for reviewing its units' compliance with this Code of Conduct. The management is also responsible for keeping adequate documentation that proves compliance by its suppliers.

As a condition for the establishment of business relationships with SDR PACK S.p.A. Group, suppliers must authorise SDR PACK S.p.A. and its appointed representatives (including third parties) to perform audits, including confidential interviews with their workers.

