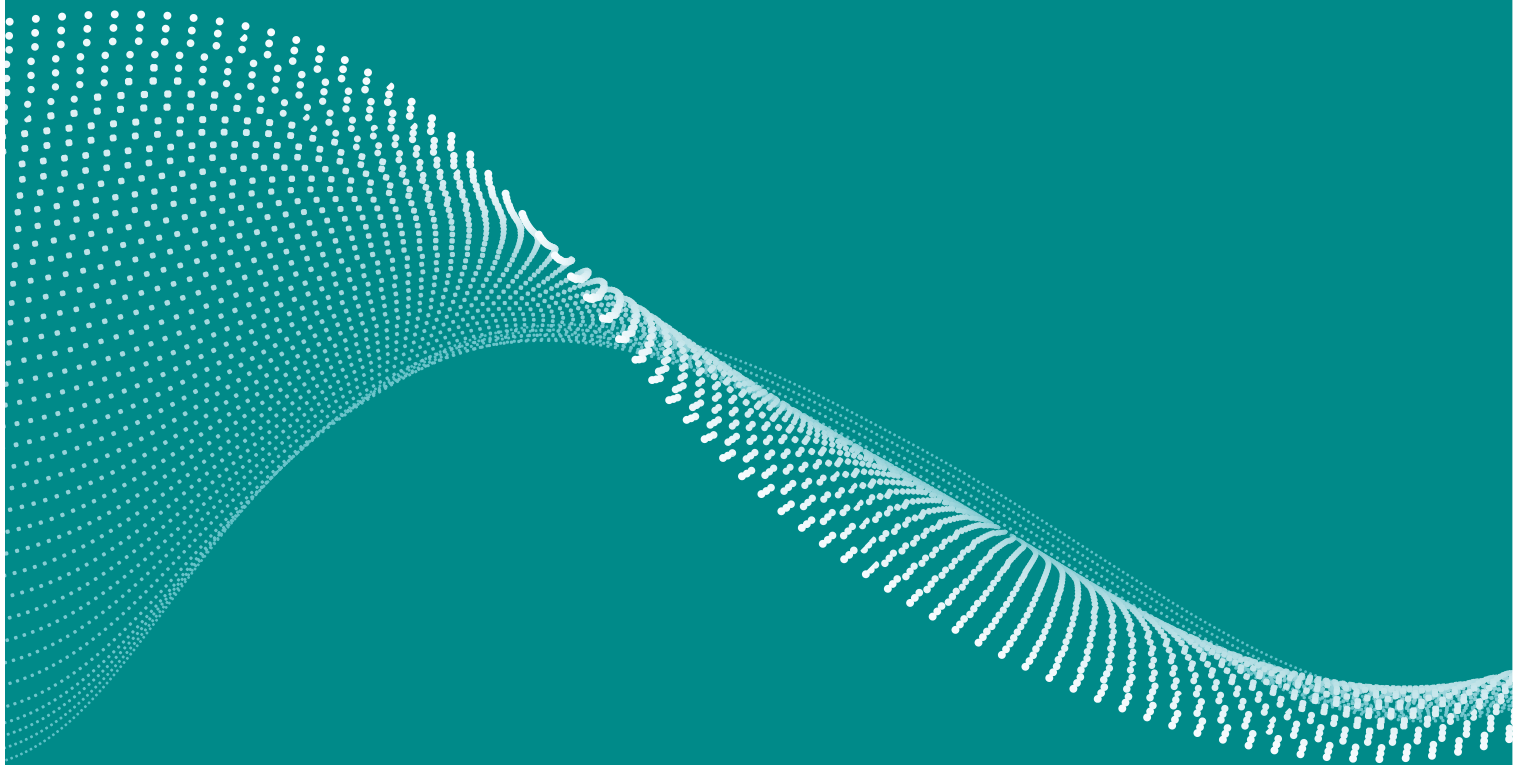


POLIDORO

Policy to combat child labour



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1 INTRODUCTION

Polidoro S.p.A. (hereinafter also the 'Company') considers respect for human rights to be a fundamental component of its corporate social responsibility strategy.

In this context, the Company has deemed it appropriate to draft this Policy for Combating Child Labour (hereinafter also referred to as the 'Policy') in order to further formalise the Company's commitment to social responsibility, actively promoting a culture of protection aimed at ensuring the proper physical, mental and emotional development of minors.

2 PURPOSE AND SCOPE

The Policy defines the main corporate commitments on combating child labour, also in relation to corporate processes related to age verification at the hiring stage, monitoring of the supply chain and any remedial actions to be implemented in the event of the presence of workers below the age required by the applicable regulations.

This Policy applies at all company sites and constitutes a fundamental reference element for conducting internal and external monitoring and verification activities with respect to the Code of Ethics, also in relation to suppliers/subcontractors, private employment agencies and sub-suppliers.

3 REFERENCE DOCUMENTATION

The Company adheres to the fundamental principles laid down in the Universal Declaration of Human Rights, ILO Convention 138 on Minimum Age, ILO Convention 182 on the Worst Forms of Child Labour, the UN Convention on the Rights of the Child and other applicable national and international rules and regulations regarding the minimum age for work.

The following is a non-exhaustive list of references in international, national and corporate law/regulation:

INTERNATIONAL REFERENCES

- UN Universal Declaration of Human Rights, Art. 25 (Protection of children).
- Convention UN on rights of the Child (Convention adopted by the UN General Assembly on 20 November 1989).
- ILO Convention 138 (Minimum Age for Admission to Employment).
- ILO Convention 182 (Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour).
- ILO Recommendation 146 (Minimum Age for Admission to Employment - Application Instrument for Convention 138).
- ILO Recommendation 190 (Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour - Implementation Instrument for ILO Convention 182).
- UN Guiding Principles for Business and Human Rights.
- Directive 94/33/EC on the protection of young people at work.

NATIONAL REFERENCES

- Italian Constitution, Articles 34 and 37.
- Legislative Decree no. 345 / 1999 - Implementation of Directive 94/33/EC on the protection of young people at work;
- Legislative Decree No. 262 / 2000- Provisions supplementing and correcting Legislative Decree No. 345 of 4 August 1999 on the protection of young people at work, pursuant to Article 1(4) of Law No. 128 of 24 April 1998.
- Act No. 157 /1981 Ratification and implementation of Conventions Nos. 74, 109, 129, 132, 134, 135, 136, 137, 138 and 139 of the International Labour Organisation.
- Law No 176 / 1991, Art. 28 - Ratification and Execution of the Convention on the Rights of the Child, done at New York on 20 November 1989.
- Law No. 148 / 2000 - Ratification and implementation of Convention No. 182 concerning the prohibition of the worst forms of child labour and immediate action for their elimination, as well as Recommendation No. 190 on the same subject, adopted by the General Conference of the International Labour Organisation during its eighty-seventh session held in Geneva on 17 June 1999.
- Law No. 296/2007 (2007 Finance Act).

POLYDORO REFERENCES

- Code of Ethics.
- Whistleblowing policy.

4 MODES OF OPERATION

4.1. Child/young worker protection

The Company condemns all forms and types of child labour and undertakes not to use or support it in any way. The Company also undertakes to promote actions aimed at developing a culture of protection of minors, supporting the dissemination of these principles also with interested parties, including its own supply chain.

In particular, the Company undertakes to

- hire only employees who have reached the age of 18 and have completed their compulsory education;
- comply with collective labour agreements and the applicable laws and regulations on labour law;
- comply with national legislation protecting the needs of working students.

4.2. Protection of students/workers in internships, apprenticeships or PCTO (Pathway for Transversal Skills and Orientation)

The company is committed to supporting all initiatives, such as internships, apprenticeships or PCTOs, that contribute to the integration of students into the world of work.

These activities are aimed at facilitating job orientation, knowledge enrichment, acquisition of vocational skills and job placement or reintegration.

Only in this specific case, in order to achieve the purposes set out above, Polidoro reserves the right to include students even under the age of 18, guaranteeing all the protections provided for by the regulations in force and by the agreements entered into with the educational institutions to which they belong.

4.3. Age verification during recruitment

When selecting a new candidate, the personnel in charge of conducting interviews are responsible for specifying the age of 18 as a mandatory requirement for possible future employment. Should the selection procedure be entrusted to other parties and/or third parties, they must be adequately informed of the nature of the checks to be carried out.

Following the selection process, during the recruitment phase, the company personnel in charge will ascertain the truthfulness of the candidate's personal data, requesting copies of identity documents, residence permit (in the case of non-EU citizens) and further documentation required by the applicable CCNL. Under no circumstances will it be possible to retain original identity documents.

4.4. Monitoring the supply chain

The Company undertakes to effectively communicate to its suppliers the contents of its Code of Ethics on child labour. During the supplier selection and qualification process, the Company performs a check on any problems in the ethical-social sphere and undertakes to request compliance with the principles contained in its Code of Ethics, effectively promoting the fight against child labour pursuant to current legislation.

The Company undertakes to apply due diligence in verifying that the parties concerned comply with the principles of its Code of Ethics, with particular reference to the use of child labour and young workers.

4.5. Responsibility application e management of child labour reports

Responsibility for implementing this policy lies with the Human Resources Department, assisted by the corporate functions it deems appropriate to involve from time to time.

In the event that, during the performance of their work activities, Company employees or collaborators identify cases that may even abstractly fall within the scope of child labour within the Company's activities, they are required to promptly report them to the Human Resources Department through the active reporting channels. The Human Resources Department will proceed to verify the existence of the reported elements, activating, where applicable, the procedure provided for by the Internal Code of Conduct and by the policies in force.

POLIDORO S.P.A

The President

