

# OTB

Dear Partner,

To OTB Group, guaranteeing the quality of its products means also operating in a transparent and sustainable way. OTB Group is committed to ensuring safe conditions in the workplace, respecting employee rights, avoiding any form of child or forced labor, as well as harassment or discrimination. OTB Group also commits to protecting the environment and animal welfare, and to complying with applicable laws concerning working conditions, environmental management, and ethical business practices.

To make sure this commitment is respected, it is essential that not only the Group and its affiliates, but also the Supplier with whom we partner, adhere to these principles and strive to improve social and environmental performance through a process of continuous improvement.

The attached document illustrates in detail the conditions that each OTB Group's Supplier is required to monitor and comply with. We are asking you to carefully read such conditions, implement them in your sites and within your own supply chain, and to return us the document duly signed for acceptance by your legal representative.

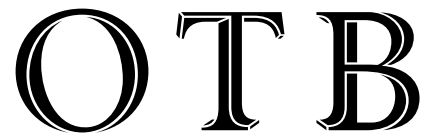
Please do not hesitate to contact OTB Group if you have questions about this Code of Conduct, or are seeking support to enhance your social and environmental performance.

OTB Group

## OTB

Via dell'Industria, 2 OTB S.p.A. / cap.soc. Euro 25.000.000 int. vers.  
36042 Breganze (VI) Italy C.F. e REG.IMPRESA VICENZA 01242510269  
T +39 0445 306555 / F +39 0445 306955 P.IVA IT01571110244 / R.E.A.N. 170761 CCIAAVI

[www.otb.net](http://www.otb.net)



## CODE OF BEHAVIOUR FOR SUPPLIERS

The Supplier must comply and hereby undertakes the obligation to fully comply with:

- All local and national laws, including social and environmental regulations;
- This Code of Conduct;
- Any action and/or initiative by OTB Group aimed to preserve legality in working conditions.

This Code of Conduct is based on (and aligned with) globally recognized social and environmental standards, particularly, the eight fundamental ILO conventions and the Universal Declaration of Human Rights.

Unless there is conflict between national law and any Supplier obligation in this Code of Conduct, the Supplier must adhere to the standard that promotes the highest level of protection for workers, communities, and other rights holders.

By signing this Code of Conduct, the Supplier commits itself (to the single companies belonging to the OTB Group, with which the Supplier will, from time to time, enter into a business relationship) to respect all the obligations set out herein.

### OTB

Via dell'Industria, 2 OTB S.p.A. / cap.soc. Euro 25.000.000 int. vers.  
36042 Breganze (VI) Italy C.F. e REG.IMPRESA VICENZA 01242510269  
T +39 0445 306555 / F +39 0445 306955 P.IVA IT01571110244 / R.E.A.N. 170761 CCIAAVI

[www.otb.net](http://www.otb.net)

# OTB

## **Regular Employment**

To every extent possible, work performed by Supplier's employees must be on the basis of a recognized employment relationship established through national law and practice.

Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligation be avoided through the excessive use of fixed-term contracts of employment.

## **Child Labour**

Workers must meet the local legal minimum age for employment, required by the law in force in the country where the manufacturing facilities are located, the age for completing compulsory education, or be at least 15 years old, whichever is higher. When employing workers under the age of 18, the Supplier must provide adequate protection against any conditions that may be hazardous to the health and safety of young workers. In particular, workers under the age of 18 must be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with their education, or to be harmful to their health or physical, mental, spiritual, moral or social development.

## **Forced Labour**

The Supplier must not use forced or involuntary labour, whether indentured, bonded, prison or labour obtained through slavery, human trafficking or otherwise. Workers will not be obligated or forced to make monetary deposits in relation to their employment, pay recruitment fees associated with obtaining work, or leave their original identity or immigration documents to the employer. Workers will have freedom of

### **OTB**

Via dell'Industria, 2 OTB S.p.A. / cap.soc. Euro 25.000.000 int. vers.  
36042 Breganze (VI) Italy C.F. e REG.IMPRESA VICENZA 01242510269  
T +39 0445 306555 / F +39 0445 306955 P.IVA IT01571110244 / R.E.A.N. 170761 CCIAAVI

[www.otb.net](http://www.otb.net)

# OTB

movement at their workplace as appropriate to their function, and will be free to terminate the work relationship in compliance with terms set forth by the laws in force and/or the collective agreements.

## **Coercion and harassment**

The Supplier must treat each employee with dignity and respect and not use corporal punishments, threats, verbal harassments, abuses, intimidation, or other forms of physical, sexual or psychological violence.

## **Discrimination**

The Supplier must not make discriminations in hiring and managing the personnel (including as regards, by way of example and not exhaustively, salary treatment, granting of benefits, career advancements, work assignments, dismissals or retirement) on the basis of: race, religion, age, nationality, language, social or ethnic origins, sexual orientation, gender, political or other opinions, property, birth, disability or other personal conditions which are not connected to experience or capability in the job (as provided for in ILO Equality Conventions 100 and 111). The Supplier should have an equal opportunity employment policy that promotes gender equity in employment practices, and ensure that men and women receive equal pay and conditions for the same jobs.

## **Freedom of Association**

The Supplier must respect the rights of employees to join unions in a lawful and peaceful manner, and to bargain collective agreements, without discriminations or interferences of any kind. Where permitted by law, the Supplier undertakes to facilitate and not to hinder the development of methods of aggregation, to enable employees to gather independently and discuss work-related issues.

## **OTB**

Via dell'Industria, 2 OTB S.p.A. / cap.soc. Euro 25.000.000 int. vers.  
36042 Breganze (VI) Italy C.F. e REG.IMPRESA VICENZA 01242510269  
T +39 0445 306555 / F +39 0445 306955 P.IVA IT01571110244 / R.E.A.N. 170761 CCIAAVI

[www.otb.net](http://www.otb.net)

# OTB

## **Corruption and Bribery**

The Supplier must respect local laws and must not engage in any form of corrupt practices, including but not limited to extortion, fraud, or bribery. Practices involving public or private corruption, illegitimate favours, and collusive behaviour are prohibited with zero tolerance.

## **Health and Safety**

The Supplier must ensure a safe and healthy workplace, in compliance with all applicable regulations, through maintaining appropriate systems and practices for emergency preparedness, fire protection, and personal safety. The Supplier will ensure workers have access to potable water, sanitary facilities, and adequate lighting and ventilation systems (in any housing provided for workers). In order to ensure the well-being of workers who manufacture products for companies belonging to OTB Group, the use of sandblasting and/or of equivalent/similar techniques in manufacturing processes is prohibited.

The Supplier must provide regular health and safety trainings to all workers and management, and must assign the responsibility for health and safety to a senior management representative that will carry out regular risk assessments to prevent accidents and injuries.

## **Working hours**

The Supplier must comply with the laws and the applicable standards of the sector concerning working hours, holidays and vacations. The personnel must receive at least one day off after six consecutive days of work, unless the laws or the collective agreements provide flexible working hours with proper compensatory days of rest.

## **Wages**

The Supplier must respect the right of personnel to a befitting wage which is always sufficient to meet the employees' basic needs, and which must

### **OTB**

Via dell'Industria, 2 OTB S.p.A. / cap.soc. Euro 25.000.000 int. vers.  
36042 Breganze (VI) Italy C.F. e REG.IMPRESA VICENZA 01242510269  
T +39 0445 306555 / F +39 0445 306955 P.IVA IT01571110244 / R.E.A.N. 170761 CCIAAVI

[www.otb.net](http://www.otb.net)

# OTB

be at least the minimum wage or the appropriate prevailing wage, whichever is higher, in compliance with all applicable laws. The Supplier must pay workers on time and provide to all workers legally required employee benefits, including (by way of example and not exhaustively) paid leave, health benefits, as well as maternity leave and child care leave benefits, in compliance with all applicable laws. Deductions from wages as a disciplinary measure shall not be permitted, nor shall any deduction from wages, unless where provided for and permitted by applicable national law or, where not provided for by such national law, only after the expressed permission of the worker concerned. All the overtime must be paid at a premium rate as provided by the national law, the collective agreements, or the prevailing standards of the sector, whichever is higher.

## **Environment**

The Supplier must comply with all applicable environmental laws, and must provide training to all relevant personnel on environmental policies and procedures. The Supplier should implement processes and systems to reduce the use of natural resources such as water and energy, and to minimize waste. OTB Group also recommends the implementation of an environmental management system to manage, track, and set goals related to environmental performance, including waste, water, and energy.

## **Animal welfare**

The Supplier must respect the animals, and should ensure the highest standards of animal welfare provided by laws and conventions applicable in the Supplier's country (or in the countries where the manufacturing facilities are located), in all the business processes (including the manufacturing processes), through the entire life of the animal. In any case, any technique to obtain plumes and feathers from live animals are prohibited.

## **OTB**

Via dell'Industria, 2 OTB S.p.A. / cap.soc. Euro 25.000.000 int. vers.  
36042 Breganze (VI) Italy C.F. e REG.IMPRESA VICENZA 01242510269  
T +39 0445 306555 / F +39 0445 306955 P.IVA IT01571110244 / R.E.A.N. 170761 CCIAAVI

[www.otb.net](http://www.otb.net)

# OTB

## **Sub-contracting**

The Supplier must not engage any subcontractor to perform, in whole or in part, any work and/or activities entrusted to him by OTB Group and/or by the individual companies belonging to OTB Group, unless expressly authorized in writing by OTB Group company concerned. In this last case, the Supplier shall be and remain responsible towards the companies belonging to OTB Group, and with the signing of the present Code of Conduct expressly assumes this obligation, of the full respect of the Code of Conduct also by the subcontractor. For the purposes of this Code of Conduct the word "subcontractor" shall mean a supplier who has no direct relationship with OTB Group and/or with the individual companies belonging to OTB Group, but which is involved by the Supplier, under the terms and conditions set out above, in the performance of part of the work and/or activities entrusted to the Supplier.

## **Implementation and grievance processes**

The Supplier must establish a process to ensure that the requirements in this Code of Conduct are implemented and consistently applied in its facilities. Such management systems should include human resources policies and procedures that are communicated to workers and whose implementation is adequately monitored.

The Supplier must also develop and implement an appropriate workplace grievance mechanism to raise workplace concerns. This mechanism must be an understandable and transparent process that provides timely feedback to those concerned, prohibit retaliation, and guarantee confidentiality of the worker lodging the grievance. The Supplier must faithfully warn the single company part of OTB Group with which it may enter in a business relationship of any serious difficulty in applying this Code of Conduct.

## **OTB**

Via dell'Industria, 2 OTB S.p.A. / cap.soc. Euro 25.000.000 int. vers.  
36042 Breganze (VI) Italy C.F. e REG.IMPRESA VICENZA 01242510269  
T +39 0445 306555 / F +39 0445 306955 P.IVA IT01571110244 / R.E.A.N. 170761 CCIAAVI

[www.otb.net](http://www.otb.net)

# OTB

## **Monitoring and compliance**

The Supplier must monitor and modify its management processes and business operations to ensure he aligns with this Code of Conduct. The Supplier is expected to monitor, measure, and improve the social and environmental performance of its facility, using appropriate management systems and tools.

The Supplier must authorize the single company part of OTB Group with which it may enter in a business relationship and its representatives to carry out monitoring activities to check the compliance with this Code of Conduct, including unannounced inspections (it being understood that the Supplier and the single companies part of OTB Group may decide to provide a reasonable period of notice, related to such inspections, in the relevant supply agreement) of the manufacturing facilities and the housing provided to employees, the possibility to check books and records relating to personnel, and the possibility to make private interviews to employees. The Supplier agrees to make available at its registered office all the documentation that may be needed to give evidence of compliance with this Code of Conduct, not falsify records, coach workers in how to answer questions, or intentionally mislead the single companies part of OTB Group or their representatives in any way. Furthermore, the Supplier must carry out effective corrective actions, which may become necessary to remedy any failure to comply with this Code of Conduct, within a reasonable period in agreement with the single companies part of OTB Group with which it may enter in a business relationship.

The Supplier declares and guarantees that its structure, its management processes and business operations are aligned and conform to the provisions of this Code of Conduct.

## **OTB**

Via dell'Industria, 2 OTB S.p.A. / cap.soc. Euro 25.000.000 int. vers.  
36042 Breganze (VI) Italy C.F. e REG.IMPRESA VICENZA 01242510269  
T +39 0445 306555 / F +39 0445 306955 P.IVA IT01571110244 / R.E.A.N. 170761 CCIAAVI

[www.otb.net](http://www.otb.net)



# OTB

## Publication

The Supplier will take the appropriate measures to ensure that the requirements of this Code of Conduct are made known to workers, through publication of the Code of Conduct in the local language (in the version provided by OTB Group or by the single companies part of OTB Group) and in a place easily accessible to employees at all times. It is also the Supplier's responsibility to share and enforce these standards within its own supply chain.

In the event of failure to comply with the provisions and/or commitments undertaken with this Code of Conduct, the single companies part of OTB Group with which the Supplier may enter in a business relationship will be entitled to cancel any order in progress and/or to terminate any existing contractual relationship with the Supplier, without prejudice to the right to compensation for damages.

## OTB Group

The present Code of Conduct for the Suppliers, from the time of the subscription, supersedes and replaces any previous Code of Conduct between the Parties.

---

Place and date

For acceptance:

---

(Stamp and signature of the legal representative)

## OTB

Via dell'Industria, 2 OTB S.p.A. / cap.soc. Euro 25.000.000 int. vers.  
36042 Breganze (VI) Italy C.F. e REG.IMPRESA VICENZA 01242510269  
T +39 0445 306555 / F +39 0445 306955 P.IVA IT01571110244 / R.E.A.N. 170761 CCIAAVI

www.otb.net