

## Code of basic working conditions

The most valuable and important resource for SIT S.p.A and its group companies ('SIT Group') is its personnel.

## International Standards and Human Rights

SIT Group guarantees, through specific procedures, practices and policies, compliance with and proper application of this Code, whose guiding principles consist of and derive from the following international standards:

- The United Nations Universal Declaration of Human Rights (which we are fully committed to in all its applications) (1);
- The International Labour Organization Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy (2);
- The European Convention on Human Rights, as supplemented by the case law of the European Court of Human Rights (3);
- The Organization for Economic Co-operation and Development Guidelines for Multinational Enterprises (4).

All applicable national, regional and European Community legislation on labour law and human rights are therefore applied.

The principles contained therein are reflected in the values espoused by the company and are the foundation of the relationship between employer and employees.

SIT Group condemns and is committed to combating any action that has as a main consequence any form of physical, psychological or corruptive abuse of the individual, such as:

- Forced labour and human trafficking: The use of any disciplinary measure involving the use of physical or psychological violence shall not be tolerated. SIT Group opposes all forms of human trafficking, as well as any other form of implicit or explicit slavery.
- Child labour: SIT Group shall not employee or benefit from any form of child labour. SIT Group may only offer to minors work experience aimed at vocational training or first-time work experience such as professional

<sup>&</sup>lt;sup>1</sup> http://www.ohchr.org/EN/UDHR/Documents/UDHR Translations/eng.pdf

<sup>&</sup>lt;sup>2</sup> http://www.ilo.org/wcmsp5/groups/public/---ed\_emp/---emp\_ent/---multi/documents/publication/wcms\_094386.pdf

<sup>&</sup>lt;sup>3</sup> http://www.echr.coe.int/Documents/Convention ENG.pdf

<sup>4</sup> http://www.oecd.org/daf/inv/mne/48004323.pdf

- internships, training programs and apprenticeships in full accordance with applicable national legislation.
- Harassment and Discrimination: SIT Group opposes and actively prohibits all forms of harassment or discrimination based on gender, religion, belief, race, colour, ethnic origin, nationality, age, marital status, pregnancy, disability, sexual orientation, political orientation, trade union membership or activism or any other personal characteristic.
- Corruption: SIT Group opposes any kind of offer or acceptance of undue rewards aimed at influencing the behaviour of other individuals, organizations, political representatives and/or government agencies in order to gain advantage of any kind or in order to induce in employees of SIT Group inappropriate behaviours contrary to this Code.

SIT Group is committed to adopting policies that make the employment relationship at its facilities a positive and sustainable experience, ensuring:

- Health and safety: SIT Group is committed to ensuring a safe and healthy workplace for all employees, in full accordance with the requirements set out in applicable regulations on health and safety at work.
- Environment and sustainability: SIT Group creates its own products according
  to high quality standards and establishes new facilities around the world
  according to the principles of respect for the environment and responsibility
  towards future generations.
- The Right to Work, Freedom of Association and Collective Bargaining: SIT Group respects and guarantees the right to work and freedom of association of employees in all its facilities. The Group undertakes to cooperate constructively with its employees and any organization representing them in order to promote the interests of employees in accordance with the needs of the Group. Working timetables and shifts are established in accordance with applicable legislation and collective labour agreements.
- Working hours: SIT Group guarantees working hours in accordance with applicable legislation. In particular, the Group's activities take place in flexible and predetermined times aimed at allowing, on the one hand, full and proper performance of employee duties and, on the other hand, a guarantee of adequate rest and leisure time.

• **Remuneration:** Remunerative payments are made in accordance with applicable legislation with the aim of promoting as far as possible the material well-being of employees. In particular, SIT Group's remuneration standards are aimed at guaranteeing employees a free and dignified existence.

With publication and dissemination of this Code at each of its locations, SIT Group promotes the adoption of policies which ensure the compliance with and correct application of this text.

SIT Group is committed to establishing business relationships with parties that recognize and promote the principles of this Code.

In addition, SIT Group shall directly and indirectly verify compliance with the Code, first of all within the Group. Employees who believe they have witnessed any infringement of this Code must notify the Group Human Resources Department.

Padua, 29 September 2017