

# CODE OF CON- DUCT

Siser  
Siser



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# WHY DO WE HAVE A CODE OF CONDUCT?

# WHO MUST FOLLOW OUR CODE?

The Siser Code of Conduct for Suppliers (hereinafter, the Code) defines minimum standards of ethical and responsible behaviour which must be met by the suppliers in line with our corporate culture.

Siser plans its activities in full compliance with laws and regulations and all the employees participate in the process of safeguarding the environment and preventing the risks involved.

The Code shall be applied to all the suppliers and is based upon the general principles that define Siser ethical behaviour:

- All Siser operations are developed under an ethical and responsible perspective, treating all the people fairly and with dignity.
- All Siser activities are carried out to respect the environment.

All suppliers are required to be aligned with Siser commitments, undertaking the Code to ensure that the standards are met.

# 01



# ILO CONDI- TIONS

# WORKING CONDITIONS

**Forced and Child labour:**

Siser shall not allow any form of forced or involuntary labour in their suppliers. They may not require their employees to make any kind of “deposits”, nor they are entitled to retain employees’ identity documents. Suppliers shall not employ minors, defined as those persons who have not yet reached their 18<sup>th</sup> birthday; in cases where local legislation stipulates a higher minimum age, the higher limit has to be applied.

**Discrimination:**

No type of discriminatory practice with regards to the recruitment, compensation, access to training, promotion, termination of the employment agreement or retirement, based on race, caste, creed, nationality, religion, age, physical or mental disability, gender, marital status, sexual orientation and/or union membership or political affiliation has to be applied.

**Treatment:**

Suppliers shall treat their employees with dignity and respect. Under no circumstances shall physical punishment, sexual or racial harassment, verbal or power abuse or any other form of harassment or intimidation be permitted

# FREEDOM OF ASSOCIATION AND REGULAR EMPLOYMENT

**Freedom of Association:**

Suppliers shall ensure that their employees, without distinction, have the right of association, union membership and collective bargaining. No retaliation may arise from the exercise of such right; workers' representatives shall be protected from any type of discrimination and shall be free to carry out their representative functions in their workplace.

**Regular employment:**

Suppliers undertake that all the employment formulas they use are part of the applicable local laws.

# SAFE AND HYGIENIC WORKING CONDITIONS

Suppliers shall provide a safe and healthy workplace to their employees, ensuring minimum conditions of light, ventilation, hygiene, fire prevention and safety measures; workers shall have access to clean toilets facilities and drinking water.

# WAGES

Suppliers shall ensure that wages paid meet at least the minimum legal or collective bargain agreement. They shall not make any deductions from wages for disciplinary purposes, nor for any reasons other than those provided in the applicable regulations, without the express authorization of workers.



# 02



**QUALITY,  
HEALTH  
AND SA-  
FETY**



# TRACEABILITY OF THE PRODUCTION

Suppliers shall not assign any work to third parties without the prior written authorization of Siser. Those who outsource any work shall be responsible for the enforcement of the Code by these third parties and their employees.

Likewise, suppliers shall apply the principles of this Code to any homeworker involved in their supply chain and shall give transparency to the locations and working conditions of said homeworkers.

# HEALTH AND SAFETY

Suppliers are responsible for all products to comply with Siser health and safety standards so that the finished products do not entail any risk to customers.

Siser suppliers shall provide information on the safety risks identified in the workplace and must properly train their employees; they are committed to identify and verify possible and potential emergencies at work, and to reduce their impact to a minimum by adopting emergency plans and response procedures for identifying workplace hazard and assessing their risks.

Emergency lights and fire alarms must function correctly and emergency routes and exits must be clearly indicated in the local language and kept free at all times.

Siser suppliers shall provide their workers with protective equipment as required by applicable law and industry standards at no cost for the workers; every worker is required to use their personal protective equipment during working hours.

03



**ENVI-  
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# ENVIRONMENTAL AWARENESS

The environment concern is increasing globally and Siser expects its suppliers to act responsibly in this respect.

Our suppliers must comply with all applicable environmental laws and regulations in their country of operation, especially concerning the production impact to climate change and water stress. Companies must have the relevant environmental permits and licensees for its operations.

# WASTE AND WATER MANAGEMENT

Water is a scarce resource in many parts of the world and should be used as efficiently as possible. All outgoing wastewater from wet processes must be treated before it is discharged. The treated wastewater quality must meet the requirements of local laws.

Any waste, and in particular, hazardous waste must be taken care of in a responsible manner and in accordance with local law.

# AIR EMISSIONS

All emissions must be managed in a proper and transparent way in accordance with relevant local laws and regulations, whichever are stricter. Air emission sources must be equipped with pollution control devices that remove or filter the contaminants prior to release, as necessary.

# HANDLING OF CHEMICALS

Chemicals containers must be properly labelled and safely stored. A material safety data sheet (MSDS) must be available (in the local language) in the workshop. The instruction of the MSDS must be followed.



04



# IMPLE- MEN- TATION AND COM- PLIANCE

# CONFIDENTIALITY OF INFORMATION

Suppliers shall preserve the integrity and confidentiality of the information they may receive as a consequence of their relationship with Siser.

The obligation of confidentiality will remain once the relation with Siser is terminated and it will include the obligation to return any material related to the company held by the manufacturer or supplier.



# CODE IMPLEMENTATION AND TRANSPARENCY

Suppliers shall implement and maintain programs to set in motion this Code.

Suppliers shall carry out their activities in an honest, upright and transparent way, keeping for these purposes an appropriate accounting records system that facilitates the traceability of their decisions, as a preventive measure versus any type of corruption, bribe and extortion that might arise.

They shall not offer, grant, request or accept any gifts or donations to/from Siser buyers which might infringe the provisions of the “Siser Code of Conduct”.

Suppliers shall not manipulate or influence their workers, nor shall they forge any files or records in order to alter the verification process regarding compliance with this Code.

# REFERENCE TO NATIONAL LEGISLATION, CONVENTIONS AND AGREEMENTS

The provisions of this Code constitute only minimum standards.

National regulations or any other applicable Law or any other commitments undertaken or applicable should govern the same issue, the provision which offers greater protection for workers shall be applied.

Siser assumes, as part of its internal norms, the content of national and international Agreements and Conventions to which it has adhered, and that they are applied in its relationship with suppliers, committing to their promotion and compliance.

# VERIFICATION OF COMPLIANCE, COMMITTEE OF ETHICS AND WHISTLEBLOWING CHANNEL

Suppliers shall authorize Siser and/or any third parties the former might appoint, to monitor the appropriate enforcement of the Code. For these purposes, they shall provide the required means and the appropriate access to the facilities and documentation required to ensure this verification. In case of non-compliant evidence contract cancellation may be applied.

This Code is aligned with the principles and values that are included in the Siser Code of Conduct, which regulates a Whistleblowing Channel to ensure its enforcement.

In this sense, the Supervisory Committee can act at its own initiative or following a formal complaint made in good faith by a supplier or other interested third party that might have any direct interest with Siser.

To this end, any notices given pursuant to the provisions of this Code, either reports breach or enquiries regarding the Code's interpretation or application can be addressed directly to the Supervisory Committee via:

Email: [odv@siser.it](mailto:odv@siser.it)

# ACKNOWLEDGMENT OF RECEIPT AND ACCEPTANCE

Organization:

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Name:

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Title:

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Place and Date:

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Signature:

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