

gruppo dondi spa

SUPPLIERS CODE OF CONDUCT

Ermenegildo Zegna Group

Supplier Code Of Conduct

via budrione-migliarina parte est, 2/a - 41012 fossoli (mo) - REA: MO 314659 – VAT# 09153650156
capital share € 1.502.800 - tel. +39 059 – 635 411

Subject to the direction and coordination of Ermenegildo Zegna Holditalia S.p.A.

www.gruppodondi.com - info@dondijersey.com - pec.dondi@legalmail.it

gruppo dondi spa

1. FOREWORD

The Code of Conduct is an important pillar of Gruppo Dondi and Ermenegildo Zegna Group's social policy.

This means that we are committed to observe and comply with all regulations and national and international conventions, in particular with regards to ethics, social responsibility and protection of the environment.

This Code of Conduct shall apply to all employees in the production facilities of all external suppliers and represent a set of minimum standards to be respected.

2. COMPLIANCE WITH LAWS

When national law or other applicable regulations address the same issue as this Supplier Code of Conduct, the highest standards or most restricting provisions has to be applied.

In case this Supplier Code of Conduct is in conflict with applicable law, the applicable law must be applied.

Our suppliers remain guarantors, regarding the working activities performed by their authorized subcontractors and suppliers and must grant their compliance with this Supplier Code of Conduct.

3. LABOUR, ENVIRONMENTAL CUSTOM STANDARDS AND SOCIAL RESPONSIBILITIES

We share with our suppliers a commitment to high ethical standards in order to grant the following principles of the Code of Conduct:

- *Workplace:* workplace standards must comply with laws and regulations like proper break areas for general rest and dining purposes and guarantees reasonable minimum conditions of light, ventilation, minimum space, hygienic standards and access to a free drinking water supply.
- *Health & Safety:* Suppliers shall provide a safe and healthy work environment guaranteeing that the following health & safety requirements (among others) are in place: adequate medical resources, fire prevention measure including fire exits, safety equipment's, ect.
- *Environment:* All our suppliers must comply with national and international environmental rule, regulations and standards. In particular, the procedures and standards applied in the disposal of waste, the handling and disposal of chemicals and other hazardous substances as well as in the handling of emissions and waste water must at least comply with the minimum statutory requirements. The supplier is required to continuously work on reducing and avoiding environmental pollution, ensuring the most possible efficient use of natural resources.

gruppo dondi spa

- *Prohibition of Forced Labour:* Suppliers will not use involuntary, forced or trafficked labour and will maintain employment strictly on a voluntary basis.
- *Prohibition of Child Labour:* Under – age employment is strictly prohibited. For this purpose, we consider “underage labour” whenever the age of the employee is below the minimum age mandated by the applicable law, or the age for completing compulsory education, whichever of the two is higher.
- *Prohibition of illegal, clandestine and undeclared workforce:* Our suppliers have to comply with all applicable regulations in order to avoid the employment of illegal, clandestine and undeclared workforce.
- *Treatment of Migrant Workers:* The United Nations defines migrant worker as: “A person who is engaged or has been engaged in a remunerated activity in a State of which he or she is not a national.” Consequently, the suppliers that will employ a migrant worker’s like steady workforce must define a policy on migrant workers in order to ensure the compliance with all legal standards and requirements.
- *Prohibition of Harassment, Abuse and discrimination:* Workplace conditions must preserve workers’ dignity and respect.
Workplace must be free from any form of harassment, abuse or corporal punishment, guaranteeing respect and equality for all the workers, regardless of race, religion, age, sex, social origin, political views, sexual orientation, or position.
- *Contracts, compensation and benefits:* Employees and employers must have proper documentation related to employment on hand. This documentation could be either an employment contract or any other legally acceptable document. The wage must be respectful of basic needs, minimum pay by category and all benefits mandated by law. Overtime compensation policies must be in accordance with local law.
All wage deductions must not be used as a disciplinary measure, except the cases specifically defined by the applicable laws.
- *Working Hours:* Hours worked each day, and days worked each week and month, should not exceed the limitations of the country’s law. The employers will provide at least one day off in every seven-day period, except as required to meet urgent business needs.
- *Freedom of Association and Collective Bargaining:* Employers must guarantee the right to join unions or other work or industry related associations, the freedom of association and the right to collective bargaining in accordance with local law.

gruppo dondi spa

- *Disciplinary System:* Our suppliers must define a discipline process in order to guarantee that each employee ensures adherence to company policies and procedures.
Each violation must be grouped in according to the gravity of the offense and the number of times violation has occurred. The disciplinary measurement will not be used to punish or embarrass an employee in order to maintain labour discipline. Deductions must be limited to those allowed by local law.
- *Customs Compliance and Security:* We require our suppliers to comply with applicable customs laws, including those relating to imports and the ban on transshipment of merchandise to the importing country. Specific facility security procedures must be designed in order to guard against the introduction of non-manifested cargo into outbound shipments (e.g. drugs, explosives, biohazards, and/or other contraband).

4. BUSINESS INTEGRITY REQUIREMENTS

Dondi and Ermenegildo Zegna Group require miscellaneous integrity requirements to our suppliers in the conduct of their business activities.

- *Anticorruption:* All our suppliers must respect all applicable laws regarding corruption and implement appropriate measures to prevent, detect and sanction any corruption, directly or indirectly, crosswise the scope of their activities.
- *Intellectual property:* All suppliers, who have been granted the use of Brands and "distinctive signs" belonging to Dondi (or Ermenegildo Zegna Group) or to the Client, must guarantee the correct use, complying with all elements defined in the business agreement, in order to protect each party against counterfeiting.
- *Protection of personal information:* We require our suppliers to comply with all applicable laws and regulations concerning the protection of personal information.
- *Trade restrictions and international sanctions:* All our suppliers must respect international trade restrictions and sanctions and regulations concerning export controls.
- *Protection of assets:* Our suppliers are required to set-up all necessary measures in order to protect our resources and assets, fighting counterfeiting, and guarantee an adequate cooperation and communication flows.

gruppo dondi spa

5. AUDIT

Audit and access to information: We reserve the right to conduct periodically compliance audits at our suppliers and their own suppliers and subcontractors in order to verify the level of compliance respect to this Supplier Code of Conduct. During the audit activities the supplier must provide all information and data's. The supplier auditee must define an action plan in order to define the corrective action in order to resolve the deficiencies identified.

In the event of any violation of this Supplier Code of Conduct by the supplier or one of its suppliers or subcontractors, Dondi Group and Ermenegildo Zegna Group reserve the right to review the business relationship and possibly terminate it in conformity with applicable law.

Date:

Supplier's Name and Address:

Name and position of supplier representative:

Signature:
