CORPORATE SOCIAL RESPONSIBILITY AND

CODE OF CONDUCT

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CORPORATE SOCIAL RESPONSIBILITY

Miniconf has been in the children's clothing business for more than thirty years and its strategies have always conformed to profoundly responsible conduct in terms of social problems.

The principles that inspired and continue to inspire the creation of products rest on our same driving values, considering the customer, the supply chain, our environment and all the subjects that interact with us.

In point of fact, adopting socially responsible conduct means setting up relationships that are fair, collaborative and with the utmost good faith in all partners that grow with the company and share its values.

These principles, which form the heart of the corporate mission, are defined in this document, the Code of Conduct; this helps disseminate and share the principles mainly within the entire supply chain.

Quality of Products and Services

Miniconf has set up its working processes to guarantee standards of quality, comfort and "fashion" image of its garments. A strict process to approve materials and controls during production as well as of incoming and outgoing goods prevents the sale of defective products or products that may otherwise be below the desired standard, and therefore to guarantee maximum customer satisfaction.

Careful production planning aims at guaranteeing a level of deliveries, furthermore in coordinated motives, which constitute one of the company's strengths.

Relations with Workers and Suppliers

Apart from complying with current legislation, Miniconf has always formulated the relationship with its employees based on respect and protection of the family. The importance given to the family lies behind the utmost flexibility towards its employees' needs and demands in terms of agreed working hours. Miniconf has placed the professional development of its employees at the centre of its Human Resources management, guaranteeing high internal mobility and considerable career advancement opportunities. The same respect and proven fairness in its relationships lies in its relationship with Suppliers as well. The present level of cooperation and collaboration are a tangible sign of this.

Teamwork and Sense of Belonging

The company's willingness to share its know-how and good standing in achieving the targeted results has led to all employees developing a strong sense of belonging. The attention the company pays to the communication and interpersonal relationship processes has also resulted in a natural propensity for teamwork with the comparative growth of everyone. Teamwork is a winner! This is the widespread awareness.

Caring for the Supply Chain

This friendly and cooperative relationship with Suppliers arises from the awareness that maximum efficiency and profitability for parties can only be guaranteed by sharing values and goals within the supply chain, but in addition to that and above all, a trusting and collaborative relationship is needed to deal with the challenges that an increasingly complex market is throwing down to us. The fact that the company's relationship with most suppliers dates back for more than a decade or so is the mark of this mutual sensitivity.

Respect for the Environment

Working activity shall be conducted in such a way as to protect and conserve the environment. Procedures for waste collection and disposal, emissions and maintenance of discharge shall comply with local laws and regulations.

Animal welfare

Miniconf S.p.A. It agreed to purchase the raw materials of animal origin in an absolutely responsible for implementing its ethical supply chain.

We have undertaken significant efforts to ensure that our suppliers implement properly along our supply chain to subcontractors.

Miniconf not use fur animal for years and does not accept supplies of other raw materials of animal origin obtained by plucking or skinning or other methods with live animals or that can cause pain and permanent injury to the animals.

We also expect that animals used for the production of raw material is raised by appropriate means, in good condition and suitable places, with enough light, food and water and with adequate freedom of movement.



Animals must be treated by avoiding the fear, pain, stress and suffering.

Miniconf held to monitor the level of compliance also arranging visits on farms if it deems useful for the proper application of the Code of Conduct.

Any views would be carried out with reference to the guidelines of Directive 98/58 / EC of 20 July 1998 on the protection of animals on farms and would be performed by an independent third party certification, highly competent and qualified.

Code of Conduct

Miniconf undertakes to maintain the highest level of integrity in all aspects of its business.

We believe that when people are treated with respect, they and the companies they work for can gain the benefits of improved productivity. Socially acceptable conduct that recognises human dignity is essential for the development of every company. We expect all our partners and suppliers to run their business according to the standards indicated below, which we profoundly believe in. As points of reference, Miniconf has adopted the conventions of the International Labour Organization (www.ilo.org), the United Nations' Universal Declaration of Human Rights, the UN conventions on children's rights. Miniconf is committed every day in getting rid of every form of discrimination and complying with the aforesaid standards in assessing its relationship with customers and suppliers.

Child Labour

Since we are aware of the variability in the concept of "child" applied in countries with different rules and habits, we refer to the definition in article 1 of the United Nations Convention on the Rights of the Child that defines a child as "every human being below the age of eighteen years unless under the law applicable to the child, majority is attained earlier".

In Countries where the law allows child labour before they attain majority, the work they perform must not interfere with the children's' education nor shall it compromise their health and/or their physical, mental, spiritual, moral or social development. Miniconf is aware of the realities existing in some developing Countries and will collaborate with the committed NGOs in attempting to improve children's working conditions and social condition in general, accepting and verifying any reports NGOs may send it about child labour exploitation behaviour.

If a company does not operate in compliance with the above as regards child labour, Miniconf undertakes not to take drastic measures until it has ascertained that improvement actions are not possible or after it has repeatedly drawn the company's attention to compliance with the fundamental ethical principles; basically, it will not ask the company to dismiss the child until that child's future is assured. Any and every decision taken shall primarily consider the interest of the children and the social and economic reality they live in.

Employment of people below the age of eighteen years must be managed in compliance with the ILO conventions C138 and C182.

Workers below the age of eighteen years shall not be employed in jobs that may jeopardise their health and safety, nor may they work at night. No person under the minimum age established by local law and in any case below the age of fourteen years shall be allowed to work.

Workers' Rights – Fundamental Rights: Forced Labour

The production activity shall comply with what is set out in ILO conventions C29 and C105 and with local current legislation. Forced labour shall not in any circumstances be used in any form.

Workers shall not be kept against their will and shall be free to leave the job with reasonable notice. Workers shall also be free to leave the workplace at the end of the working day.

Prison work, conceived only and exclusively to recuperate and re-launch people, shall be carried out in compliance with the principles of the Code of Conduct, the ILO conventions and national legislation, in other words the work shall be paid, voluntary, without exploitation and coercion. The company shall not withhold guotas of the wages or personal documents.

Workers' Rights – Fundamental Rights: Disciplinary Practices

Every worker shall be treated with respect and dignity. No employee shall be subject to harassment or physical, sexual, psychological or verbal abuse, including corporal punishment.

Workers' Rights - Fundamental Rights: Freedom of Association and Collective Bargaining

Workers, without exception, shall have the right to belong to or create trade associations by choice and the right to collective bargaining. Employers shall not discriminate against trade union representatives or prevent them from carrying out their work in the association. Management shall not threaten, punish or interfere with the worker's right to join associations. Company procedures and policies shall adhere to the ILO convention C98 and to local legislation in force.



Workers' Rights - Fundamental Rights: Discrimination and Harassment

People shall be employed on the basis of their ability to perform the work required. There shall be no form of discrimination based on age, national, social or ethnic origin, trade union membership, race, colour, sex, religion, political opinion, pregnancy, sexual preference, disability.

Workers' Rights: Working Hours and Remuneration

Corporate procedures and policies shall comply with ILO conventions C95, C131 and C1.

Hours of work shall not exceed the limits set out by local law and by the reference contract nor shall they exceed the number of working hours agreed in recognised international conventions. The employer's extraordinary request for overtime shall be limited and paid in compliance with local and national laws. Regular and annual rest periods, as well as sick leave and maternity leave, shall be governed by local legislation. Employees absent on sick and maternity leave shall not be liable to repercussions or dismissal by the employer.

The wages paid for ordinary hours and overtime shall at least arrive at the minimum wage level of the contract of reference. Illegal or unauthorised deductions shall not be made from the pay check.

Health and Safety: Factory

All local health and safety laws shall be complied with.

All workers shall be guaranteed a safe and healthy workplace: the temperature of the workplace shall be tolerable and airflow shall be adequate for every season in the year; lighting shall be sufficient for the activity carried out and for all working hours; separate men's and women's sanitary facilities shall be clean and adequate for the number of workers. Workers shall have access to these without unreasonable restrictions.

For each activity carried out, suitable individual protection devices shall be provided and equipment shall not be accepted without suitable safety systems. Dangerous substances or materials shall be correctly identified and a procedure shall be available for correct use. Emergency exits shall be provided, if possible, on each floor and shall be clearly marked, with outward opening and completely free of impediments. All workers shall be informed of the safety devices present in the factory that will be periodically subjected to regular controls. Each floor shall have its own evacuation plan and fire drill shall be carried out periodically.

Health and Safety: Dormitories and Canteen

If the company provides personnel with living facilities, all local health and safety laws shall be complied with. Workers shall be able to use their own bed and a suitable living space for normal use. Men and women shall have separate dormitories, bathroom and shower facilities and shall not be forced to leave the dormitory during their free time.

The canteen shall be clean and comfortable. Staff working there shall possess all health requisites required.

Health and Safety: Sandblasting

The process, known under a variety of names such as, for example, *denim abrasion, denim sandblasting* and others, is a process in which the sand (silica and quartz powder) is shot onto the surfaces of the garments by means of high-pressure compression so as to achieve ageing effects.

The collision of the sand grains increases the silica content in the air where it can be inhaled by the operators for long periods of time.

The silica particles can cause serious injury to the lungs and in fact numerous deaths have been caused to operators in this sector from silicosis, including after exposure for relatively short periods of time.

Miniconf asks for the sandblasting operation not to be used in the production of its denim garments and that supplier companies which use it for other manufacturers' garments adopt all possible precautions and suitable personal protective equipment.



Respect for the Environment

The work must be conducted in order to protect and preserve the environment. The procedures for the management and disposal of solid waste, air emissions and discharges must comply with local laws and regulations.

The procedures for handling chemicals must be such as to ensure that discharges are within the values of law and that the finished products supplied to Miniconf that discharges ourselves are in agreement with the RSL - Chemical Safety Requirements of Miniconf.

The management of chemicals should include an adequate procedure of selection, procurement, testing for acceptance, labeling, storage, use and disposal.

A safety data sheet (MSDS) should be available in local languages for all substances purchased.

Waste and Discharges - any refusal, and especially dangerous ones, should be treated in a responsible manner and in accordance with applicable laws and regulations and respect the environment.

The water, as extremely valuable asset should be treated with the utmost care, avoiding waste and with the utmost attention to reducing consumption.

All waste water must be treated before being discharged, in accordance with local and national laws, and within the parameters prescribed by the RSL - Chemical Safety Requirements for water.