

CODE OF CONDUCT

WETURN

2023





INTRO

It is of great importance to Weturn that its partners share and respect a common set of rules on social and environmental responsibilities. In particular, Weturn is committed to fully promoting the fundamental values of respect for Human Rights and good practice in terms of working conditions, ethics, the environment and fight against corruption.

For this reason, Weturn has put in place a social and environmental code of conduct with which all of its partners, subcontractors and other business partners must comply. By signing the code of conduct, the partner accepts its terms and undertakes to fully comply with the principles set out. The partner is expected to pass on these principles throughout its supply chain.

This code of conduct is part of a traceability and sustainable development approach. Requirements of this code of conduct are based on Weturn's values and the main internationally recognized standards. Weturn adheres in particular to the values of:

- the Universal Declaration of Human Rights
https://www.ohchr.org/EN/UDHR/Documents/UDHR_Translations/eng.pdf
- the International Labour Organisation (ILO) Declaration of Fundamental Principles and Rights at Work
<https://www.ilo.org/declaration/text/declaration/lang-en/index.htm>
- the Organisation for Economic Co-operation and Development (OECD) Guidelines, which aim to improve economic and social welfare worldwide
<https://www.oecd.org/daf/inme/48004323.pdf>
- the United Nations' Global Compact, which sets out ten principles related to respect for human rights, international labour standards, the environment and the fight against corruption
<https://www.unglobalcompact.org/what-is-gc/mission/principles>

In the event of a breach of this code of conduct by one of its partners or subcontractors, Weturn reserves the right to re-examine, and possibly terminate the business relationship, in accordance with the conditions laid down by the applicable law.



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- Subcontracting
- Transparency
- Prevention of conflicts of interest
- Confidentiality
- Protection of personal data
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- Customs authorities

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- Safety in the workplace
- Building maintenance and safety
- Staff training for emergency situations
- Accidents in the workplace

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- Water management and wastewater treatment
- Air emission, resources and energy management
- Waste management
- Handling of chemicals
- Animal abuse

III Verification, compliance and monitoring

- Cooperation
- Access to information and monitoring

The general rule is that all partners must, in all their activities, comply with all laws and regulations in force in the country where they operate.



**-I-
LEGAL STANDARDS
AND COMPLIANCE**

01. HUMAN RIGHTS AND SOCIAL RESPONSIBILITIES

Prohibition of child labour

Weturn rejects and prohibits the use of child labour. The partner must ensure that the activities carried out do not in any way directly or indirectly involve the employment of children under the age of 15. The term «child» refers to any person under the minimum legal age for employment in the country where the work is carried out. The partner shall ensure that children who are between 15 and 18 years of age are not subjected to working conditions that would be likely to jeopardise their safety and their physical, mental or moral development.

Prohibition of forced labour

Weturn prohibits the use of any form of forced or compulsory labour as well as slavery and servitude. The term «forced or compulsory labour» refers to any work that is not voluntary or that is required of a person under the threat of sanctions, withholding of identity papers, any kind of security deposit from the workers, or any other coercion.

Workers' rights

The partner must draw up and send to the employees a written employment contract, stipulating the terms and conditions of their employment. This contract must be drawn up in the local language of the country in which the activity is carried out. The partner must ensure that employees know their legal rights and duties.

Harassment

Every employee must be treated fairly, with respect and dignity. The partner agrees to ban all forms of corporal punishment, violence and moral, physical or sexual harassment.

- II - OUR PARTNERS' SOCIAL COMMITMENTS

Weturn works to ensure respect for Human Rights and social conditions. Weturn expects its partners to share this same commitment.

Discrimination

The partner undertakes not to discriminate in any way on the basis of race, age, gender, sexual orientation, ethnic origin, pregnancy, disability, religion, nationality, trade union membership, political opinion or any other basis.

Wages

The partner undertakes to pay wages on a regular basis and in consideration of the experience, qualifications and amount of work performed by the employee. The partner shall adopt remuneration policies that meet or exceed the legal minimum wage set by national or local legislation and that overtime pay is at least equal to the usual hourly wage. No deductions from wages may be made for disciplinary reasons.

Working hours

The partner shall comply with national and local regulations on the limitation of working hours and the management of overtime. The working hours must not exceed the legal maximum. Each employee is entitled to at least one day off for every 7 days worked.

Freedom of association

The partner recognises and respects the right of workers to form, join or refuse to join an association or trade union organisation, and the right to collective negotiations without any form of discrimination.



Anti-corruption

Wetum does not tolerate any form of corruption. The partner agrees to comply with all applicable laws and regulations regarding prohibition of corruption and to take appropriate measures to combat extortion, bribery and embezzlement. Partners undertake that they, their employees, distributors, subcontractors and service providers will not offer, give or accept to offer or solicit, directly or indirectly, advantages of any kind or payments of money for the purpose of profit.

Subcontracting

The partner is required to monitor the social and environmental responsibilities of their subcontractors with reference to this code. The partner is required to inform Wetum of its relations with its subcontractors.

Transparency

The partner undertakes to work transparently with Wetum and must refrain from providing misleading information or claims. The partner undertakes to pass on its certifications and labels obtained and undertakes to provide Wetum with documents that are not falsified.

Prevention of conflicts of interest

The partner must comply with all applicable legislation on conflicts of interest. The partner must disclose all situations that could create the appearance of a conflict of interest in its collaboration with Wetum.

Confidentiality

The partner must undertake all necessary steps to guarantee the confidentiality of sensitive information, including personal and confidential information to which they have access. Information may not be used for commercial purposes unless prior permission is given by the owner of the information.

Protection of personal data

The partner undertakes to comply with the applicable laws and regulations on protection of personal data.

Intellectual property

The partner agrees to respect Wetum's intellectual property rights by respecting its inventions, developments, concepts, trade secrets, patents, copyrights, trademarks and other intellectual property rights.

Customs authorities

The partner must comply with the applicable customs legislation.



03. HEALTH, SAFETY AND HYGIENE

safety in the workplace

The partner must comply with applicable health and safety laws and regulations, and take all necessary measures to ensure a safe and healthy workplace for its employees. No employee shall be exposed to situations that could be dangerous or harmful to their health.

Building maintenance and safety

Buildings and/or infrastructures must comply with national and local regulations, particularly with regard to building safety and maintenance. Regular inspections and controls must be carried out by experts to ensure that these requirements are met.

Staff training for emergency situations

The partner undertakes to provide all necessary training to its employees regarding any potential emergency situations (fire, first aid, etc.). Response procedures and emergency plans must be in place to eliminate or reduce these risks. Partners should also ensure that their employees do not work in a hazardous environment and that they are provided with personal protective equipment and appropriate first aid kits. A sufficient number of staff should be trained in first aid. Clearly marked and unobstructed emergency exits must be available in the building.

Accidents in the workplace

The partner must have procedures and systems in place to prevent, manage and monitor occupational accidents and illnesses. The partner must comply with applicable occupational health and safety, and insurance laws.



04. ENVIRONMENTAL PROTECTION

Weturn works to preserve and protect the environment and its living beings. Weturn expects its partners to share the same commitment. The partner must adopt measures to reduce its environmental impact and must comply with national and international regulations in its sectors.

Water management and wastewater treatment

The partner is required to implement an appropriate environmental management system to preserve natural resources and protect the environment. In particular, the partner must treat wastewater before discharging it into the natural environment or discharging it into authorised reprocessing plants.

Air emission, resources and energy management

The partner is required to respect the environment. In particular, the partner must adopt measures to reduce its air emissions, use of resources and is committed to reduce its energy consumption.

Waste management

The partner undertakes to treat all waste, in particular hazardous waste, and ensures that it is treated in accordance with local laws and not illegally buried.

Handling of chemicals

The partner must comply with national and local laws, especially with regard to chemical restrictions and storage of chemical substances. Hazardous chemicals must be handled in a way that ensures safe handling, transport, recycling and disposal.

Animal abuse

If the partner is engaged in a business relationship involving animals, it must ensure that best practices are in place throughout the supply chain with respect to animal treatment, respect and welfare. The partner is required to do its utmost to monitor the knowledge of the origin and source of the raw materials used.





- III - VERIFICATION, COMPLIANCE AND MONITORING

Cooperation

Weturn expects all its partners and their subcontractors to accept that, by signing the terms of this Code of Conduct, they undertake to respect it and to do their utmost to comply with the requirements set out. Weturn expects its partners to cooperate in a transparent manner.

Access to information and monitoring

Weturn reserves the right to question the partner in order to verify compliance with the conditions and principles set out in this Code of Conduct, both by the partner and its subcontractors. The latter shall provide all information and supporting documents necessary to confirm and validate the compliance with these conditions. The partner undertakes to improve or correct any shortcomings detected. Weturn undertakes to support its partners in the implementation and application of best practices, with the aim of resolving any shortcomings deemed minor. In the event of non-compliance with the requirements, the partnership may be reviewed by Weturn and corrective measures must be taken by the partner within a set period.



CODE OF CONDUCT AGREEMENT

Date:

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Partner's name and address :

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Representative's name and position:

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Representative's signature :

Stamp (if applicable) :

WETURN

Images courtesy of Archivio Manico

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