



INTERNA

CONTRACT

SOCIAL ETHICS CODE OF CONDUCT

This document represents the wish of the Management of the Interna group to offer a transparent definition of all the values and behavioural regulations which are a reference point when carrying out one's activities and to protect the reputation and image of the group on the reference market. It constitutes a fundamental element of the company's organisational model, along with their mission, vision, organisational dispositions and integrated Quality, Environmental and Ethical system and represents an instrument which safeguards all those who, whatever their position or role, freely participate in creating and divulging a transparent image of the company's values.

The aims of this document may be summarised in the following points:

- 1) to contribute in the respect of fundamental human and trade-union rights, international labour regulations and safeguard of the environment;
- 2) to contribute in guaranteeing that the growing process of internationalisation takes place with constant respect for the point above;
- 3) to contribute in promoting an improvement in working conditions, the safeguard of health and safety and respect for working hours and salary levels established by international regulations or collective agreements within the companies with which the Interna Group produce their products, either directly or indirectly.

Whenever their authority so permits, Interna Contract Spa, Interna Collection Srl and Interna Holding Spa, and all companies which sign contracts for the supply of goods or components for such goods, are committed to respect the norms contained in the following Fundamental Conventions of the ILO: Convention N° 87 concerning the Freedom of Association, Convention N° 98 concerning the Right to Organise and Collective Bargaining, Conventions N° 100 and 111 concerning Equal Retribution for Men and Women and Discrimination in the Workplace, Convention N° 155 concerning Occupational Health and Safety and Conventions N° 138, 146 and 182 concerning Minimum Working Age and Child Labour.

In order to conduct their activities responsibly and ethically exemplary, the Management has established the following principles:

Discrimination and freedom of association

- forms of discrimination concerning recruitment, remuneration, access to training, promotions, dismissal or retirement based on race, colour, sex, age, religious

- beliefs, marital status, sexual orientation, political affiliation or citizenship, or any other form of discrimination against the law, are neither accepted nor tolerated;
- the same work opportunities are open to everybody, so that anybody may benefit from equal treatment based on merit, without any form of discrimination;
 - the right of all the members of the workforce to form or become members of a trade union of their own choice and their right to collective agreements are guaranteed; membership may never be a reason or motive for discrimination;

Working Hours and Retribution

- salaries must correspond to legal standards and, in all cases, must be sufficient to guarantee a person's primary needs and discretionary earnings; the composition of salaries, deductions, indemnities and the modality of the payment of said salaries must be communicated clearly to the workers and must be clearly indicated for their benefit;
- weekly working hours, salaries and overtime, including part-time and contract work, must be regulated according to national legislation.

Child and Forced Labour

- nobody under the minimum legal age may be used during any of the production phases, and if no legal working age has been established, a minimum age of 15 must be applied;
- forced labour must never be used, workers must be free to leave the workplace at the end of their shift and surveillance must only be used for safety purposes;

Health and Safety

- workers must be granted periods of leave for illness and maternity as established by the law;
- the company must guarantee that the place of work is safe for workers and must comply and improve upon current local laws and regulations regarding health and the prevention of accidents;
- suitable sanitary facilities must be available, they must comply with local hygiene norms and must be well-maintained and cleaned regularly;
- sufficient space must be made available for meals and other breaks;
- if the company supplies living quarters for workers, they must guarantee that the rooms and bathrooms comply with the minimum requirements, are sufficiently ventilated and comply with fire-prevention norms and all other local laws;
- the company must be well lit and ventilated and all walkways and exits must be accessible at all times;
- sufficient medical assistance must be available at all times in the case of emergencies and the persons responsible for medical assistance must be trained beforehand in first aid techniques;
- there must be sufficient, well-indicated emergency exits and all workers must be trained to use the exits;
- safety systems on machinery must comply with or improve upon local norms.

Disciplinary Procedures

- behaviour, such as gestures, offensive language or physical contact which are considered to be sexually coercive, threatening, offensive or considered to be exploitive, are neither accepted nor tolerated;
- psychological or physical forms of discipline must not be adopted or encouraged;

- norms and laws regarding the safeguard of the environment where a person's work activities are concerned must be respected; the entire organisation must actively promote this theme;
- it is forbidden to offer, donate, ask or accept, including through third parties, any kind of reward or personal gain connected with the running of the company.

In particular, the Interna group will be committed to taking positive measures so that any company which signs a contract to supply products or services, or a part of such products or services, fully respects the above points. The company, therefore, will nominate a person to manage such agreements and implement internal control programmes in each individual company and in their main suppliers' companies, according to well-defined, documented procedures taken from their own integrated Quality, Environment and Ethics management system.

The controls must be carried out at least annually and the results of the inspections and controls will then be subject to joint analysis between the management, representatives of the management and representatives of the workers.

A declaration of conformity with the code of behaviour must be signed by the person in charge of each supplier. Contracts for the supply of goods or products must specify that non-conformities with the code, or the adoption of a temporary action plan which does not comply with the code, is considered a breach of contract and that the contract will be cancelled.

This code, translated into the local language, will be sent or made available to the personnel using a suitable means.

Tavagnacco, 10th April, 2009.

Interna Group Management