

## Code of Conduct at the workplace of Italia Wanbao-ACC



Italia Wanbao-ACC has always adopted corporate procedures in compliance with all applicable laws and regulations, committing itself to conduct its business of producing hermetic motor-compressors for refrigeration for domestic use with honesty and integrity, considering the rights of man and work, the health and safety of people and the protection of the environment.

### **Field of application**

The Code of Conduct is applicable to all persons working for Italia Wanbao-ACC and its suppliers; it must be a point of reference for all employees at any level, role and business process.

### **Responsibility**

The management of Italia Wanbao-ACC is responsible for implementing the Code and providing for the dissemination and training of all employees.

Employees are required to behave in accordance with this Code and are required and encouraged to communicate any non-conformance to their direct superior or to the single trade union representation (R.S.U.) or to the Personnel Management or the Direction of establishment or, on a confidential basis, using the appropriate boxes.

All reports will be adequately detailed.

There will be no negative consequences or retaliation for communicating such cases of discrepancies.

Failure to comply with this Code may result in disciplinary actions that may even lead to dismissal, depending on the situation.

### **Compliance with laws and regulations**

Italia Wanbao-ACC and its suppliers must operate in compliance with the relevant laws and regulations applicable to their activities.

Furthermore, all employees must comply with the internal rules and regulations of Italia Wanbao-ACC as required by the circumstances.

### **Suppliers**

All suppliers of Italia Wanbao-ACC must agree to comply with this Code of Conduct.

The supplier in turn is required to request its suppliers to comply with the provisions contained in the Code.

Suppliers must ensure that the procurement of materials in products, parts or components supplied to Italia Wanbao-ACC does not contribute in any way to the violation of human rights in areas affected by conflicts or high risk.

### **Corruption, bribes and business ethics**

Italia Wanbao-ACC carries out its activities in a fair and legal manner; it does not tolerate any form of corruption, neither financial nor other illicit acts.

In Italia Wanbao-ACC, suppliers of Italia Wanbao-ACC and their respective employees are not allowed to offer, donate, request or receive bribes or other types of improper benefits.

### **Human rights, child labor**

Italia Wanbao-ACC respects the protection of universally recognized human rights and does not accept any form of child labor.

Unless the local legislation establishes a higher age limit, no person under the age of compulsory schooling or at the age of 15 should be hired.

For authorized minors, the management is responsible for ensuring that the conditions, working time and remuneration are appropriate for their age, in accordance with applicable laws.

If the presence of minors at work is ascertained in a place where products or components are made for Italia Wanbao-ACC, it is necessary that any action is undertaken exclusively in the best interests of minors and it will also be necessary to implement all actions corrective measures necessary to maintain or improve the social condition of the children themselves.

### **Forced work**

No form of involuntary or forced work performance or violation of free will or the will of the people is absolutely tolerated, including bound work and unapproved penitentiary work.

### **Non-discrimination**

Italia Wanbao-ACC respects cultural diversities and differences.

All employees will be treated exclusively according to their skills and qualifications in any employment decision, including: hiring, promotion, remuneration, benefits, training, dismissal and termination of employment.

### **Harassment and abuse**

Italia Wanbao-ACC respects the dignity, privacy and personal rights of every employee and is a guarantor to prevent any incidents of discrimination and harassment in the workplace.

No employee should be subject to harassment, intimidation, mistreatment or abuse of any kind (physical, sexual, psychological or verbal).

### **Disciplinary actions and grievances**

The disciplinary actions must be implemented in such a way as to ensure a fair and humane treatment of the employees. No employee must be subjected to corporal punishment. Progressive disciplinary actions will have to be applied. Employees are encouraged and required to report any problems or violations of this Code and they will not be subjected to retaliation in any way nor will they suffer other negative consequences.

### **Health and safety**

All employees must be assured of a safe and healthy working environment, taking every precaution to prevent and effectively manage occupational accidents and occupational diseases.

### **Respect and protection of the environment**

Compliance with the applicable environmental laws and the requirements established by Italia Wanbao-ACC regarding the environment must be guaranteed.

A management system aimed at continuously improving the company's environmental standards and performance must be maintained. All relevant environmental aspects should be identified and appropriate measures taken to address them, including resource consumption, emissions, chemicals and waste.

### **Working time**

Employees may not be required, as a rule, to work over 48 hours a week in a standard work week, or to work for more than 60 hours (including overtime) in a total work week.

Except for extraordinary business circumstances, all workers are entitled to at least two days off every 14 days.

### **Remuneration**

Remuneration, including overtime and benefits, shall be equal to or above the level prescribed by the applicable legislation, in any case sufficient to ensure the worker and his family a free and dignified existence.

Italia Wanbao-ACC encourages consideration of the cost needed to meet the needs of workers and their families at the time the pay levels are established.

### **Freedom of association and the right to collective bargaining**

All employees are free to exercise their legal right to set up organizations to defend their interests, to associate or abstain from association with such organizations.

No employee should be subjected to intimidation or harassment in the peaceful exercise of these rights.

The employer must also respect the workers' right to collective bargaining.

### **Monitoring and compliance**

The management of Italia Wanbao-ACC is responsible for regularly monitoring compliance with this Code of Conduct and is also responsible for maintaining the documentation necessary to demonstrate compliance by its suppliers.