

Medac Supplier Code of Conduct

General Principles

Medac is committed to conducting business in an ethic, responsible and legal way striving at any moment to improve sustainability of its products and an ethical behavior.

In this perspective, suppliers are required to pursue the same goals.

Medac's Code of Conduct defines the minimum standards of conformity. All suppliers therefore are required to promote principles defined in this document and extended to their suppliers. In addition they are expected to comply with applicable laws, regulations and standards of the nation in which they operate.

If local laws and Medac's Code of Conduct concern the same subject matter, the most favorable provisions to workers will be applied.

Human Rights

Suppliers shall respect and promote human rights as stated in the Universal Declaration of Human Rights of the United Nations and it shall avoid being co-responsible for their violations. Suppliers shall respect the personal dignity, privacy and rights of each individual.

Forced Labour

Suppliers shall engage in or support the use of forced or compulsory labour, slavery, human trafficking including prison labour. Personnel shall be free to terminate their employment provided that they give reasonable notice. Suppliers shall not withhold any part of any personnel's salary, benefits, property or documents in order to force such personnel to continue working. Suppliers shall ensure that the employment is freely chosen and free from threats.

Child Labour

Suppliers shall not engage in or support the use of child labour. By definition, a "child" is a person under 15 years of age, unless the minimum age for work or mandatory schooling is higher by local law, in which case the stipulated higher age applies in that locality. A "young worker:" is a worker under the age of 18 but over the age of a child, as defined above.

Children or young workers shall not be employed in any place or situation where their health, safety and well-being could be put at risk.

If a child should be found working at any of the suppliers' locations, the latter are obliged to solve the situation for the best interest of the child. Policies and programs, such as involving education or health in support of any child, shall be supported by suppliers.

Freedom of Association And Collective Bargaining

Suppliers, through the Management, shall support a direct and honest bargaining with their employees. Suppliers shall respect the workers right to form, join and organize trade unions they may choose and are free to join any workers organization they wish.

Suppliers shall allow workers to freely elect their own representatives in situations where the right to associate is regulated by law.

Suppliers shall not discriminate workers and any personnel engaged in organizing workers. They are free to perform their duties in the workplace

Discrimination

Suppliers shall not engage or support discrimination based on race, national, territorial or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, union



membership, political opinions, age or any other condition that could give rise to discrimination in hiring, remuneration, access to training and promotion.

Suppliers shall not subject workers or potential workers to medical tests unless required by law or in order to ensure safety at work. Such tests shall not be used in a discriminatory way.

Working Conditions

All workers shall have a signed working contract by both parties. This contract shall define the terms and conditions of work. A signed version shall be issued to the worker.

Suppliers shall respect the right of personnel to a living wage and it shall always meet at least legal or industry minimum standards. Suppliers shall ensure that personnel's wages and benefits composition are detailed clearly and regularly to them in writing for each pay period. All overtime shall be reimbursed at a premium rate in accordance with national law. Suppliers shall not make deductions from wages for disciplinary purposes. The normal hour week, not including overtime, shall not exceed the limit defined by law. Personnel shall be provided with at least one day off following every seven days. Suppliers shall grant to personnel the paid leave in accordance with local law. Suppliers shall keep the information concerning working, overtime and leave hours. Suppliers shall treat all personnel with dignity and respect. The use of corporal punishment, mental or physical coercion or verbal abuse of personnel are strictly forbidden.

Health and Safety

Conforming to the International Standards and national law, the supplier shall guarantee a safe and healthy workplace environment and shall take effective steps to prevent potential health and safety incidents and occupational injury. Health and safety regulations shall be communicated to parties under control of the Supplier, including working at the supplier's site. Suppliers shall implement a systemic approach to health and safety management concerning effective health and safety training preventing accidents, health problems and emergency situations. Suppliers shall act in accordance with local and international environmental standards, maintaining proper documentation of their environmental permits.

Environment

Suppliers must put their efforts in reducing effects of their manufacturing activities throughout the entire life cycle of the products, from the beginning of the process to the recycling or sorting of its components. In any case the potential negative effects on the environment cannot be foreseen and evaluated, the suppliers must take steps to limit those possible consequences.

The development of innovative manufacturing systems which are able to give environmental and social benefits together with the diffusion of friendly technologies must be promoted.

Suppliers involved in the production and manufacturing are encouraged to adopt managerial methods which lead to the protection of the environment.

Confidentiality and Privacy

Suppliers must classify all data concerning clients, commercial activities, contracts, projects, structure, situation or financial performances belonging to Medac as confidential, unless they should have written permission by the latter. They must operate assuring that all data and information belonging to and about the clients are kept protected against any violation.

Intellectual Property

Suppliers must respect the rights of intellectual ownership.



Money Laundering

Suppliers must fight all types of money laundering and adopt measures to prevent others from taking advantage of their own financial transactions.

Anti-Competitive Behavior And Conflicts Of Interests

Suppliers must not be the cause or be part of any violation of competition laws.
They must also point out cases of possible or effective conflict of interests.

Monitoring and Audit

The company Medac can inspect the suppliers' production sites to verify compliance to this Code of Conduct. Medac can choose to designate independent personnel or company to take audits. Medac can require "self assessment" evaluations based on the principles of the code.
Audits will be organized by appointment fully respecting international conduct regulations (ISO 19011).

Reporting

All violations of work and human rights, environmental damage or any unethical behavior must be pointed out. Information can be sent by e-mail to (sa8000@medac.it).

The information received if containing sensitive data, will be classified by Medac as "Confidential" and managed in accordance with current legislation. Medac undertakes to implement internal procedures to avoid the dissemination of information classified as "confidential".

Date

Stamp and signature for acceptance

