

Titolo: CODE OF CONDUCT			Codice Documento: REG 03 ENG
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REVISIONS

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SOMMARIO

1.	INTRODUCTION.....	2
1.1	Purpose	2
1.2	Introduction.....	2
1.3	Applicability.....	2
1.4	Terms and Definitions	2
2.	MAIN PRINCIPLES.....	2
2.1	ETHICS.....	2
2.1.1	Business Integrity.....	2
2.1.2	Protection of intellectual property.....	3
2.1.3	Confidentiality of information and disclosure of information.....	3
2.1.4	Responsible Sourcing of Materials.....	3
2.1.5	Risk Management	3
2.2	LABOUR AND HUMAN RIGHTS	3
2.2.1	Compliance with Regulations	3
2.2.2	Freedom of association and the right to collective bargaining.....	3
2.2.3	Non-Discrimination.....	3
2.2.4	Fair labor conditions, wages and working hours.....	3
2.3	ENVIRONMENTAL MANAGEMENT	3
2.4	HEALTH AND SAFETY	4
2.5	SUPPLIERS.....	4
2.6	DOCUMENTATION.....	4
2.7	CONTINUOUS IMPROVEMENT	4
2.8	EVALUATION AND MONITORING	4
2.9	SHARING INFORMATIONS.....	4

Titolo: CODE OF CONDUCT			Codice Documento: REG 03 ENG	
Data di rilascio: 19/07/2016	Data di Revisione: 14/11/2018	Revisione: 2	Pagina: 2 di 4	

1. INTRODUCTION

1.1 Purpose

The purpose of this document is to address a solid line of conduct for the whole company, based on the highest ethics and sustainability standards.

Economic success and sustainable business are not contradictory but go hand in hand, better together.

1.2 Introduction

ROJ management is committed in assuring that all the company activities are managed in a fair and transparent manner, respectful of Laws, with safe and health working places and conditions, with respect and dignity towards all the employees or external collaborators and with manufacturing processes respectful of the environment.

ROJ oblige itself to operate in full compliance with laws, norms and directives of the countries where it operates.

This CODE of CONDUCT outlines the minimum requirements the organization and the employees shall met, regarding fair business practices and ethics, labor practices, environmental impact, health and safety performance.

1.3 Applicability

The Code is applicable to every function, process and activity managed by ROJ and to every employee, according his responsibility.

1.4 Terms and Definitions

ROJ – Roj srl

Code – ROJ Code of Conduct

Employees - ROJ employees and all other people cooperating with ROJ in any contractual form, including: managers, directors, supervisors, with and blue collars.

Concerned Parts – All persons, organizations, companies, civil society being involved actively or passively in ROJ business.

2. MAIN PRINCIPLES

2.1 ETHICS

ROJ apply the highest ethics conduct standards in respect of all the employees, customers, suppliers and all the concerned parts.

2.1.1 Business Integrity

ROJ shall not engage in any form of corruption, extortion, embezzlement or bribery; shall comply with all applicable anti-corruption laws and regulations of the country in which operate and all applicable international anti-corruption conventions. ROJ is obliged to foster fair and impartial competition. ROJ suppliers shall adhere to international trade regulations and export control regulations.

Every ROJ employee, must maintain an unquestionable standard of integrity, including:

- Never offer and accept gifts or other benefits that doesn't comply with anti-corruption and anti-money-laundering regulations
- avoid any conflict of interest.
- be respectful of company goods and resources, refrain from any use illegal, or against Company's interests.
- use company goods and resources correctly, and respectfully, avoid to damage them, compromise their efficiency, make them potentially harmful.
- always assume an attitude based on respect, protection of the dignity of the person, collaboration, human solidarity.
- reduce waste, environmental impact and company resources use in every activity.

Titolo: CODE OF CONDUCT			Codice Documento: REG 03 ENG	
Data di rilascio: 19/07/2016	Data di Revisione: 14/11/2018	Revisione: 2	Pagina: 3 di 4	

ROJ shall not support anybody in evading tax.

2.1.2 Protection of intellectual property.

ROJ employees shall respect intellectual property rights and shall manage the existence of information on technology and know-how in such a manner that ROJ, and customers, intellectual property rights are adequately protected.

2.1.3 Confidentiality of information and disclosure of information

All ROJ employees shall treat the information strictly confidentially and according rules and regulations, even after they leave the Company.

Suppliers and customers information and documentation is as well treated confidentially and protected at any time.

2.1.4 Responsible Sourcing of Materials

ROJ commit itself in using raw materials of legal and sustainable origin. ROJ wants to avoid sourcing “Conflict Minerals¹”, or their derivatives, as they contribute to the financing of armed conflicts and enable human rights abuses.

ROJ suppliers are involved in assuring the fair sourcing of parts and material supplied.

2.1.5 Risk Management

ROJ shall implement all what needed to identify, state, describe and manage all the risks, in all the activities related to his business.

2.2 LABOUR AND HUMAN RIGHTS

ROJ must respect human rights of all employees, treat them with dignity and respectfully, as stated in the “United Nations Universal Declaration of Human Rights”, and the conventions and recommendations of International Labor Organization.

2.2.1 Compliance with Regulations

ROJ shall comply with all applicable regulations, laws and rules applicable to his activity, on international, national or regional basis. Labour agreements shall be respected as well.

2.2.2 Freedom of association and the right to collective bargaining.

ROJ must recognize to its workers the right to join unions and collective bargaining associations, as permitted and in compliance with applicable laws and regulations.

2.2.3 Non-Discrimination.

Only professional qualifications matter.

Roj recognize and appreciate the existence of different values and cultural standards. Each person has equal opportunity in employment and should not be discriminate on the basis of age, race, nationality, social or ethnic descent, gender, physical disability, sexual preference, religion, political reference, or union membership.

2.2.4 Fair labor conditions, wages and working hours.

ROJ must comply with all applicable regulations, with international, national and local laws and / or collective agreements regarding wages, benefits, working time and working conditions.

2.3 ENVIRONMENTAL MANAGEMENT

ROJ shall comply with all applicable environmental regulations and legislation.

ROJ commit herself in developing better and cleaner processes with the aim to minimize the impact on the environment and follow best practices in environmental management, including energy and

¹ The term “conflict minerals” is defined as columbite-tantalite, also known as coltan (from which tantalum is derived); cassiterite (tin); gold; wolframite (tungsten); or their derivatives; or any other mineral or its derivatives determined by the Authorities to be financing conflict in the Democratic Republic of the Congo or an adjoining country.

Titolo: CODE OF CONDUCT			Codice Documento: REG 03 ENG	
Data di rilascio: 19/07/2016	Data di Revisione: 14/11/2018	Revisione: 2	Pagina: 4 di 4	

resource efficiency, limitation of CO2 emissions and other greenhouse gasses, responsible water management, waste treatment, reduction and recycling.

2.4 HEALTH AND SAFETY

ROJ must provide a safe and healthy workplace for all the employees.

ROJ commit herself in operating in a safe way, continuously working towards a goal of zero incidents; providing workers with of all the necessary training, efficient personal or collective protection means, efficient fire prevention and fire fighting plans, first aid care, healthy environment and what else considered as useful to reduce health and safety risks in any working activity, condition and place.

2.5 SUPPLIERS

ROJ adopted a "Suppliers Code of Conduct" to involve them in the best practice; they are expected to implement a Supplier Code of Conduct, as well, in their upstream supply chain.

The principles described in the Supplier Code of Conduct, are the same principles present in this ROJ Code of Conduct.

ROJ reserve the right to suspend relationship with suppliers if violations of the Code of Conduct are discovered or suspected.

2.6 DOCUMENTATION

Relevant documentation shall be kept and recorded to demonstrate compliance to this code, deviations, and improvement actions.

2.7 CONTINUOUS IMPROVEMENT

ROJ must work to continuously improve his conduct and sustainability performance, applying appropriate measure and corrective actions.

2.8 EVALUATION AND MONITORING

This Code of Conduct form an integral part of ROJ activities management, thus the violation of principles stated in this document and related procedures and regulations compromises the relationship of trust between ROJ and its administrators, employees, consultants, collaborators of any kind, customers, suppliers, commercial and financial partners.

ROJ will assess the compliance to this "Code" using the appropriate tools.

Violations, as well as any dishonest and illegal behaviour will be pursued by the Company in a timely and immediate manner, through appropriate and proportionate disciplinary measures.

The Company, to protect its image and to safeguard its own resources, will not entertain any kind of relationships with subjects that do not intend to operate in strict compliance with current legislation and / or refuse to behave according to the values and principles set by this Code .

2.9 SHARING INFORMATIONS

ROJ requires all those who in various roles collaborate in corporate activities to conform their behavior to those described in this "Code" and share the knowledge about described principles with everybody involved in the processes.

Every ROJ employee is invited to report to his / her direct manager, or to the HR manager any discrepancies, shortcomings or violations related to this Code.