

OUR COMMITMENT

Naturalleva brand of the VRM Group recognizes its active role in promoting a culture that aims to adopt responsible practices as an integral part of its processes. This effort, to be achieved, is also reflected to our suppliers and the entire supply chain that makes it up. For this reason, it was helpful to formalize a supplier code of conduct.

This document embraces the fundamental principles enshrined in the ILO International Labor Conventions and aims to regulate and promote respectful practices and behaviors regarding labor, discrimination, health and safety, dialogue, and the environment.

As part of our continued growth, we expect our suppliers and sub-suppliers to follow these principles and commit their own suppliers to abide by them as well.

The following standards establish the requirements needed to qualify and maintain active collaboration as Naturalleva suppliers. We expect our suppliers to implement these requirements and continuously monitor their own and related providers' compliance. If suppliers fail to comply with the requirements mentioned in this code, it will be possible to terminate any previously established agreement or supply relationship.

FIELD OF APPLICATION

This document defines minimum non-negotiable standards for suppliers and is applicable to all Naturalleva vendors.

1) LICENSES AND LEGAL PERMITS

The supplier warrants that it has all legal permits and licenses required based on the nature of the business activity and the location of the establishment.

2) HUMAN RIGHTS AND WORKING CONDITIONS

2.1 Forced, bonded and forced labor or human trafficking

The provider does not use or support any use of forced bonded or compulsory labor, such as workers under threat of punishment, prison labor, deception or failure to provide information on working conditions, payment for employment and related commissions.

2.2 Goods and services

The provider ensures access to free sanitation and potable water, the presence of accessible, available and affordable public transportation or other transportation options, support in finding lodging, designated areas for breaks, and a safe, intact and clean environment.

2.3 Child labor, child protection and the young workers

The supplier recognizes: the right to education, lifelong learning and does not interfere with it, the right to rest and play, the right to the satisfaction of basic needs, prevents and is committed to eliminating child labor from its supply chain, and follows ILO conventions on minimum working age or to the laws in force in the country of employment.

2.4 Discrimination and equal opportunity.

The provider guarantees, equal treatment of all employment applicants and employees in all cases, including: disciplinary practices, job assignment, pay and benefits, promotion and other career opportunities, recruitment process and conditions, retirement, dismissal, training, working conditions; regardless of age, caste, color, disability, ethnicity, gender, legal status, marital status, nationality, parental status, union membership, political opinion, pregnancy, race, religion, sexual orientation and also guarantees in recruitment not to practice or encourage pregnancy or virginity tests and any medical tests not applicable to risk exposure.

2.5 Freedom of association and collective negotiation

The provider informs all employees that they are free to join or form Workers' organizations (i.e., unions or other organizations representing their labor concerns and interests).

2.6 Salaries and labor contracts

The provider and/or employment agencies ensure that they do not come into their possession of any documents without which the employee would not be able to freely terminate employment, travel or leave the country. They guarantee that all employees have received, understood and agreed upon written and understandable information on the terms and conditions of employment, pay at or above the legal minimum wage(if the law does not precede this, collective agreements or Workers' organizations are used). The following are still guaranteed: transparency in payments, maternity or paternity rights, working hours in line with ILO minimum working age conventions or to the laws in force in the country of employment.

2.7 Worker dignity, health and safety.

The supplier ensures the implementation of appropriate pre-job training activities; also ensures that it maintains, monitors and updates a risk assessment related to health and safety for the prevention of injuries, the free provision of all PPE (personal protective equipment) defined in the risk analysis, adequate First Aid, effective systems of employee safety information and training, occupational injury insurance to all employees where not provided by a national system, the adoption of transparent and decent internal codes of conduct, and does not operate deductions from base pay.

2.8 Privacy Protection

The provider ensures suitable spaces with separation by gender if required, protection and confidentiality of data (contracts, medical tests, hygiene services), efficient system for anonymous internal reporting and complaints including non-retaliation procedures.

2.9 Engagement and dialogue

The supplier ensures clear, effective, accessible and anonymous complaints mechanisms for all stakeholders, proactive engagement with local communities and indigenous peoples, and takes action to reduce its negative impacts to the extent possible by hiring employees from local communities.

3) NATURAL RESOURCES

The supplier makes continuous efforts to comply with local laws and regulations on air emissions, noise, pollution, and discharges to land and water, to reduce its environmental impact, and to manage natural resources efficiently. This includes implementing measures to prevent pollution, minimize energy use and waste generation, and manage water resources responsibly. Suppliers will ensure continuous improvement in their overall environmental performance and will commit to working with their suppliers in this regard throughout the product supply chain.

4) PRODUCT CHARACTERISTICS

The supplier guarantees the absence (< 0.9%) of Genetically Modified Organisms and applies all necessary measures in order to avoid any unintentional contamination.

5) IMPLEMENTATION

Naturalleva provides its employees and all stakeholders involved in the company's dynamics with the ability to access the Whistleblowing platform to securely, free of charge and anonymously report any significant issues or wrongdoing they have become aware of that violates this code.

To use the platform, simply access the company's website, www.naturalleva.it

6) CONTROL ACTIVITIES

Naturalleva reserves the right to verify suppliers' compliance with this document through audit planning according to the SMETA methodology created by Sedex (ZC5000026897).

This code shall be brought to the attention of all company personnel by posting on the company bulletin board or any other means that is considered effective.

7) VIOLATIONS

Compliance with the principles contained in the Code is an obligation for all parties involved, so in case of violations Naturalleva reserves the right to terminate any relationship.

READ, APPROVED AND SUBSCRIBED

Date _____

Stamp and signature _____