

Anti-slavery policy and trafficking in human beings

In ODE S.r.l. we work with prestigious brands to solve the management and implementation challenges of brands, ensuring their consistency all over the world.

Our corporate culture of good governance for good business is reflected in a series of fundamental values for relations with the main stakeholder groups: customers, producers, suppliers, subcontractors, employees and all team members. We apply the same values to all business relationships, so as to bring out our attitude towards the exploitation of people in any form, in particular the crimes provided for by the Modern Slavery Act 2015.

We therefore commit ourselves to oppose modern slavery in all its forms, preventing it at any cost. We ask to put into practice the same attitude to all those who work for us and with whom we have business relationships.

Purpose of this policy

According to the Modern Slavery Act 2015 (from now on "Act") modern slavery is a crime and can take place in various forms, including servitude, forced labor and human trafficking, which have in common the deprivation of liberty of one person from another for the purpose of exploitation and personal or commercial gain. This document defines the policy of ODE Srl (hereinafter "Company") with the objective that modern slavery can manifest itself within the headquarters or supply chain. The meaning of the term "modern slavery" can be found in the Act.

As a group we have a zero approach to modern slavery.

We are committed to acting ethically and with integrity in all our relationships and business relationships. In fact, we apply effective systems and controls to ensure that there is no slavery in the implementation of our activities or those of our suppliers.

Application

This Policy applies to all companies, employees, representatives, subcontractors, suppliers and all those who work for ODE Srl worldwide when acting in the context of their employment or contractual relationship with us.

Prevention and Commitment

To this end, ODE Srl emphasizes and requires that its companies, employees, representatives, subcontractors and suppliers undertake to:

- Do not support or resort to child labor, respecting all applicable local laws regarding child labor;
- Do not intentionally use forced or involuntary work, even through
 - (a) threat of abuse or abuse of laws or legal proceedings;
 - (b) threats or physical constraint against another person;
 - (c) plans aimed at making a person think that, if he did not perform such work or service, that person or another could suffer serious harm or physical constraint;
- Do not resort to any form of human trafficking, whether by force, fraud or coercion; or to any form of involuntary bondage or slavery; or to any form of human trafficking for sexual purposes or to procure sexual acts for profit;
- Do not destroy, hide, seize or otherwise deny an employee access to documents relating to identity or immigration, such as passports or driving licenses;

ODE S.r.l. società a socio unico
Capitale Sociale € 100.000,00 int. vers.

Sede legale e Stabilimento:
Via Borgofrancone, 18 Z. Ind. - 23823 Colico (LC) - Tel. +39.0341.930570
Cod. Fisc./P.IVA/Registro Imprese di Lecco n° 02828190138 - R.E.A. di Lecco n° 299414 - Mecc. LC 020845
Società soggetta a Direzione e Coordinamento da parte di Waverton International Limited

Uffici Commerciali e Amministrativi:
Via Modigliani, 45 - 20090 Segrate (MI)
Commerciale: Tel. +39.02.715429 - Fax +39.02.715144 - www.ode.it
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- Do not put in place deceptive or fraudulent practices during the hiring of employees or the job offer, committing as far as possible to disclose to employees, in a form and in a language they understand, basic information relating to terms and key working conditions, including salary and ancillary services, workplace, living conditions, costs for accommodation and related costs (if the accommodation is provided or arranged by ODE Srl or its representatives), any relevant costs for the employee and, if applicable, the dangerous nature of the work. If required by law or by contract, provide a work contract, an employment contract or other requested written work document, which will be in a language understandable to the worker;
- Do not charge employees with recruitment costs and do not use recruiters who do not comply with local labor laws in the country where they are hired;
- Respect all local laws regarding wages, accessories and working hours.

Responsibility

The responsibility for preventing modern slavery rests with corporate leadership.

The Board of Directors is responsible for ensuring that this policy and its implementation comply with our legal and ethical obligations.

The team manager at all levels is responsible for understanding and respecting this policy and that all company personnel receive adequate and constant training on it and on the problem of modern slavery.

Actions to denounce modern slavery or trafficking in human beings

Employees of ODE Srl who became aware of or were witnesses to a violation of this Policy, or who were not sure of the correct behavior to keep in relation to the matters set out in this Policy, are invited to immediately contact their supervisor. If the matter is not resolved or the employee does not feel comfortable raising the issue with his supervisor, he will have to use other appropriate reporting channels for his business unit.

ODE Srl implements a zero tolerance policy towards its employees, representatives, subcontractors or suppliers that use or support the use of slavery, forced, involuntary or imposed labor, child labor, human trafficking or human trafficking for purposes sexual. Failure to comply with this Policy will result in the application of disciplinary measures until the termination of the employment relationship. If it is discovered that a subcontractor or supplier has failed to comply with this Policy, ODE Srl will immediately take corrective measures to deal with the violation, even taking into consideration the interruption of the commercial relationship with the supplier or subcontractor.

safeguarding

We are committed to ensuring that no one is subjected to discriminatory treatment following the good faith reporting of modern slavery in any form and in any area / sector of activity.

By discriminatory treatment we mean dismissal, disciplinary action, threats or other unfavorable treatment following a suspect's complaint.

The company ODE Srl will accept and keep anonymous the complaints of its staff, although anonymity makes investigations more difficult and goes to undermine the verification procedures.

Therefore encouraging our staff to sign their complaints.

Accusations or claims that are considered harmful or oppressive will involve disciplinary actions.

Communication and awareness

All suppliers, contractors and partners are notified at the beginning of the business relationship and our zero tolerance approach to modern slavery is reiterated, if necessary, even afterwards.

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www.ode.it

Revision

The policy against slavery and trafficking in human beings will be reviewed by the board of directors and may be amended from time to time.

This Act will be used to formalize our Declaration on Slavery and the Trait of Human Beings that we will publish on the company website.

29/09/2019

ODE S.R.L.
a Socio Unico
Via Borgofrancone, 18
23823 COLICO (LC)
Partita IVA 02828190138



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