

CORPORATE SOCIAL RESPONSIBILITY POLICY

This document officially formalises the Social Responsibility Policy of Impresa Tre Colli SpA, proposed by the Ethics Committee and adopted by Management.

This policy should be considered as an integration of the Health Safety and Environment Policy, and similarly to the latter, it declares the specific targets to achieve, describes the general guidelines to reach them and how to review and reformulate them.

The Policy, and the knowledge of the purposes which it intends to pursue, are disclosed within the Organization through integration of quality management system, intranet of the company, noticeboards and staff training.

Outside, it is made known through the publication on the company website.

Anyway, on request, it's made available to all interested parties.

The Management took the duty to work consistently with the principles of standard SA8000 through transparent methods and systems designed to detect and meet the expectations of key stakeholders: customers, suppliers and, firstly, employees.

The consistency of Social Responsibility Policy with business strategies in place is evaluated by the Management and periodically reviewed to ensure its compliance with the company policies.

By the definition of this policy and by the continuous improvement plan associated to the membership of SA 8000, the Management has formally taken the responsibility of the following commitments:

- Complying with national laws, the Community and the International ones concerning labor standards and workers' rights, complying with the provisions contained in official documents and their interpretations;
- Maintaining over time the requirements of social responsibility and, if necessary, complying with the new requirements;
- Ensuring the regular monitoring and the continuous improvement of the implemented management system defining, during the meetings of the Ethics Committee, the specific targets of improvement and verifying their achievement through a panel of remarkable indicators;
- Ensuring a proper information and training in ethics and social responsibility to all staff
- Sensitizing suppliers to the principles of social responsibility of SA8000 standard, from sharing of values of Impresa Tre Colli SpA at the base of the certification project;
- Organizing audits and periodic internal and external inspections in order to verify the compliance with social requirements and, if necessary, taking all corrective actions and preventive measures.
- Documenting and communicating to the stakeholders the commitment of the company with regard to Corporate Social Responsibility even through the Social Report.

The Ethics Committee is an internal organism, responsible for implementing of the management system SA8000.

It supports the Management in verifying and monitoring the compliance with social requirements.

The Committee has to be involved, in particular, for critical situations, in order to implement the necessary corrective measures.

With regard to specific social requirements of standard SA8000, Impresa Tre Colli S.p.A., states as follow:

1. Child labor

It cannot be used, or encouraged the use of child labor; procedures for the recovery of children employed have to be established by providing, in particular, support so they can attend school; it must be established procedures that would encourage school attendance; dangerous situations must be avoided.

Impresa Tre Colli S.p.A. didn't employ children in the past, does not use them at the present, will not use child labor in the future. It does not induce its suppliers to adopt these practices. For some time, in candidate selections, it requires at least an upper secondary school degree which implies an high average level of schooling; moreover, the new employee, has to be 18 years old.

2. Forced and Compulsory Labor

It cannot be used, or encouraged the use, of forced and compulsory labor; in particular, at the beginning of employment, it can not be requested to leave deposits.

Impresa Tre Colli S.p.A. regulates relationships with the staff only through legislation.

At the beginning of employment, it does not require any deposit and it does not put in place, in respect of its suppliers, actions such as to induce the adoption of these practices. Moreover, the CVs received are all treated in compliance with privacy regulations.

3. Health and Safety

It's necessary to ensure health and safety in workplace; it must be appointed a management representative for safety and prevention; it has to be ensured to all personnel adequate training; any potential health risk has to be identified and faced.

Impresa Tre Colli S.p.A. considers health and safety of workers a value, training and information on these issues a priority.

In terms of compliance with applicable laws, the company has adopted a Risks Assessment Document, it has appointed a Prevention and Protection Manager and it requires to the Representatives of Employee for Safety to report possible risks, intervening in order to implement them.

4. Freedom of association and right to collective bargaining.

Workers have the right to join and forming unions, the right to collective bargaining, the workers' representatives can not be discriminated in workplace and they have to be to communicate with the members; in case of limitation of associative rights according to laws, companies have to facilitate the use of other means.

Impresa Tre Colli S.p.A. does not prevent its employees from joining a union, workers are free to choose whether and to what union association joining in; union membership is a matter managed according to privacy regulation.

Decentralized bargaining with the RSU of the company is made according to laws in place. Impresa Tre Colli SpA guarantees to workers the rights of assembly and of strike.

5. Discrimination.

It can not be enforced discriminations relating to: race, social class, national origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political views, age, or any other condition that could lead to discrimination. Any behaviours, gestures, language and physical contact, which are threatening, offensive, aimed at exploiting or sexually coercive are not allowed.

Impresa Tre Colli S.p.A. makes staff recruitment basing on established needs of the company (type of professional demand) and on the candidate's correspondence.

Prerments are performed trying to achieve the best use of employees' professional skills and taking into account their merits.

Considerations about any condition that could lead to discrimination are not used, for the purposes of professional or economic progressions.

Impresa Tre Colli encourages relations between workers based on mutual respect

6. Disciplinary actions

It cannot be used, nor tolerated, corporal punishments, mental or physical coercions, verbal abuse to staff.

Impresa Tre Colli S.p.A. only admits those disciplinary actions provided by Italian legislation. They are due to behaviors of grave negligence or willful misconduct. In interpersonal relationships, particularly in the hierarchical ones, abuse attitudes are not allowed.

7. Working Hours.

Working hours should be adjusted as provided by laws and standards of business sector: if the national legislation is less restrictive than SA8000 requirement, ordinary work will be not exceeding 48 hours per week with one day of rest, the overtime must not exceed 12 hours per week, it must be voluntary and paid in excess, in case of collective bargaining, the request for overtime must be in compliance with agreements.

Impresa Tre Colli S.p.A. applies the working hours provided by the national contract, which results lower than standard SA8000.

All changes regarding overtime or shifts, as well as the maximum of working hours per week, rest days, festive or night work, are negotiated with the R.S.U., according to law.

8. Remuneration

It must be guaranteed the legal minimum wage, the salary must fulfill the basic needs and ensure an additional fee; payslip has to clearly and regularly detailed; remuneration must be delivered according to law and in the most convenient way for workers; it is recommended not to abuse the signing of cooperation agreements which prevent you from paying workers in a regular way; It is forbidden to apply false apprenticeship schemes.

Impresa Tre Colli S.p.A. gives to each employee, at the time of recruitment, a qualification and the corresponding salary. The salary is regularly paid for quantity, methods and delivery times. Additional benefits are paid according to the contract. Increases for festive or night work are regularly payed.

Any possible allocation of functions and higher categories (career progression) result in an automatic modification of the fee.

9. Management system

9.1 Policy

Senior management has to define policy for the compliance of the standard's requirements, national and supranational laws, of commitments, and those for continuous improvement; the policy must be documented, implemented, updated, disclosed, made understandable and accessible to staff and, if requested, to the interested parties.

Impresa Tre Colli SpA, and in this case the Management, is acting and will continue to act in accordance with the rules and responsibilities taken on: this policy represents commitment in this regard, from it come all actions required for its implementation, documentation of continuous improvement and disclosing of results achieved, in an understandable form, to staff and to all interested parties

9.2 Representatives of the organization

It must be appointed a representative on SA8000 both for Management and workers.

The Board Chairman of Impresa Tre Colli S.p.A. appointed a Management Representative on SA8000, while the union/RSU of the company appointed its workers representative on SA8000.

The two representatives, along with other employees belonging to the managerial and non-directive areas, belonging to different sectors of the business process, are members of the Ethics Committee.

9.3 Management review

The Senior Management shall periodically review the adequacy, suitability and the constant effectiveness of the policy and procedures making any necessary corrective actions.

Impresa Tre Colli S.p.A. established that procedures and timing of review have to be suggested by the Ethics Committee; Senior Management, in association with the representative for SA8000, identifies the strategies relating to the corrective and preventive actions to implement.

9.4 Planning and Implementation

In order to implement, at all levels, the management system, roles and responsibilities must be defined; it is necessary to provide training for new personnel and periodic training to the existing staff, monitoring activities and results.

Impresa Tre Colli S.p.A. has provided specific methods of informing employees about the management system in place and training aimed at improving effectiveness and efficiency of the management system in place through the addition of CSR skills. In particular, for new employees, *basic training relating to SA8000*; for existing staff, is provided *periodic training* covering all Organisation's levels, with an increasing degree of complexity and making audits about the training effectiveness. However, both activities and results are monitored.

9.5 Control of suppliers, subcontractors, sub-suppliers

It must be applied procedures for selections of subject indicated on the basis of their ability to comply with SA8000.

They must provide a written commitment to comply with the standard, to participate in monitoring activities, to identify and apply any necessary corrective actions, to report on their relationships with other subjects; suppliers, subcontractors and sub-suppliers must demonstrate their compliance with the standard; in case of contacts with homeworkers, are required written purchase contracts complying with standard SA8000, these requirements must be understood by workers, it must be stored recordings of workers' identities, quantities of goods supplied or of hours worked; finally, it must be carried out regular and frequent monitoring actions, even without notice, to verify the standard compliance.

Impresa Tre Colli S.p.A. has pledged itself to make understood and applied all these "rules of social responsibility" to all its suppliers.

For this purpose it was developed an informative whose attached is a letter of membership through which the provider declares its commitment to comply with the principles of SA8000 standard.

Suppliers are selected with maximum attention to their behaviors: for the same overall assessment, the suppliers who gain recognition are all who, adhering to the path of social responsibility undertaken by Impresa Tre Colli SpA, can provide greater assurance of compliance with the requirements of standard SA8000. Management has developed a procedure to identify new suppliers.

9.6 Issues and corrective actions

It must be considered, investigated, treated all audit findings by staff with regard to non-compliances; no discrimination or disciplinary action may be implemented towards employees who point out those findings; any corrective and preventive actions must be appropriate and the resources for these purposes must be available ; workers must be informed of the possibility to submit complaints to the certification body.

Impresa Tre Colli SpA, represented by the Management Representative, responsible for SA8000, has promoted the constitution of an Ethics Committee to whom may be sent, even anonymously, all findings.

The Committee assesses the appropriateness of the findings received in relation with the certification standard, then submits to the Management the corrective or preventive actions to be implemented.

All employees are informed about the possibility of sending those findings to the Ethics Committee by means of internal communication channels and, if there are no returns, to the Certifying Body and then to SAI, the International Organization for SA8000 Accreditation.

9.7 External communication and involvement of stakeholders

Companies have to implement any procedures to communicate to all stakeholders the information in relation to the performances of the Company regarding SA8000 standard, including the results of the checks and management review; it is necessary to evidence the willingness to dialog with all stakeholders to achieve compliance in relation to SA8000 standard.

Impresa Tre Colli SpA, by appointing the Responsible for SA8000, and therefore the Ethics Committee, has planned the development of communication procedures to external stakeholders

9.8 Access to verifications.

To check the real fulfillment of the obligations imposed by standard, if required, both for announced and unannounced audits, companies must provide inspectors with informations and allow inspectors to get to permises.

Impresa Tre Colli SpA, by appointing the Responsible for SA8000, and therefore the Ethics Committee, has planned the procedures for obtaining information to demonstrate, at any time, the real fulfillment of the obligations imposed by standard; during audit, the Company ensures the maximun collaboration for the completion of verification by inspectors.

9.9 Recordings

Companies have to keep documents to demonstrate compliance with the requirements of standard SA8000.

Impresa Tre Colli SpA, by appointing the Responsible for SA8000, and therefore the Ethics Committee, has planned the procedures for the production and recording of documents to demonstrate its own compliance to SA8000 standard.

Additional documents are stored and available on demand, in separate sections that may engage, in different ways, activities concerning SA8000.

This policy aims to represent a guidance and a support for each employee, as to enable him to pursue in a more effective and efficient way the mission of the Company.

At the same time, for any outside subject, it represents a means of knowledge and elaboration regarding to some aspects of the business management of Impresa Tre Colli SpA, relating to CSR, SA8000 certified.

Carrosio, 28 maggio 2012

The Vice-President

Gianfranco Persegona

