



VALVOLE PER L'INDUSTRIA CHIMICA E PETROLIFERA
VALVES FOR CHEMICAL AND OIL INDUSTRY

ISO 9001:2008
certified Quality System



CALOBRI s.r.l.

Con socio Unico

Via Newton 4 – 20019 Settimo Milanese (Milano) Italy



CALOBRI VENDOR CODE OF CONDUCT

CALOBRI s.r.l.

Con socio Unico

Via Newton 4 – 20019 Settimo Milanese (Milano) Italy



CALOBRI VENDOR CODE OF CONDUCT

This Vendor Code of Conduct (“Vendor Code”) is an extension of Calobri Code of Ethics (the “ Code of Ethics,” a copy of which may be found at www.Calobrivales.com, and establishes the standards for conducting business with Calobri.

Calobri, a company part of the OMB group, understand that our success depends on our reputation for ethical business performance and performing our jobs honestly, diligently and with integrity, in compliance with all applicable laws and regulations. Consistent with our commitment to conduct business fairly and honestly, we seek out business partners who share in our culture, values and business practices.

For the purposes of this Vendor Code, “Vendor” means any company, corporation or other entity or person that sells, or seeks to sell, goods or services to Calobri, including the Vendors’ employees, agents, subcontractors and other sub-tier sources.

Vendor is responsible for communicating the contents of this Vendor Code of Conduct to its officers, directors, employees, agents, subcontractors and sub-tier sources who are involved in the procurement and production process related to products and services provided to Calobri.

COMPLIANCE WITH LAWS AND REGULATIONS

Calobri and subsidiaries worldwide do business throughout the world. Because of Calobri’ worldwide presence, a Vendor must comply with all laws and regulations applicable to its business in the countries where it does business, including all laws and regulations relating to each subject matter below.

Vendor recognizes that Calobri’ obligations and requirements extend to all countries where Calobri does business, and that in some cases, Vendor may be required to conduct business in accordance with the laws of the countries in which Calobri operates.

ANTI BRIBERY

Vendor is prohibited from engaging in any corruption, extortion or embezzlement, in any form.

Vendor must comply with all applicable anti-corruption laws and regulations of the countries in which they operate, **the U.S. Foreign Corrupt Practices Act, the UK Anti-Bribery Act, the OECD Anti-Bribery Convention and any international anti-corruption conventions.**

Vendor will not offer or accept bribes or employ other means to obtain an undue or improper

CALOBRI s.r.l.

Con socio Unico
Via Newton 4 – 20019 Settimo Milanese (Milano) Italy



advantage. Bribes, kickbacks, facilitating payments and similar payments to government officials or to Calobri' employees or agents acting on Calobri' behalf are prohibited. Each Calobri' business is required to maintain a register of gifts and hospitality received and offered.

CHILD LABOR AND FORCED LABOR

Vendor must comply with all applicable local laws with respect to child labor. Vendor must not use forced, bonded, involuntary, prison or indentured labor.

WAGES AND WORKING HOURS

Vendor must comply with all applicable local laws with respect to wage and hour laws, including those relating to minimum wages, overtime hours, and other elements of compensation, and will provide all legally mandated benefits. Vendor will not require employees to work more than the maximum number of hours permitted under applicable laws.

FREEDOM OF ASSOCIATION

Vendor must respect workers' rights to associate freely, in compliance with existing local laws and without intimidation, reprisal or harassment. Workers' rights under local laws to join labor unions, seek representation and/or join worker's councils should be acknowledged by Vendor.

DISCRIMINATION

Supplier must not discriminate against any worker in its hiring and employment practices based on race, color, religion, disability, national origin, gender, sexual orientation, marital status, age or other characteristic protected by local law. Supplier must not discriminate against any worker based on political affiliation or union membership in its hiring and employment practices.

FAIR TREATMENT

Vendor will treat its workers with dignity and respect. Vendor will maintain a workplace free of harassment and discrimination and shall not threaten workers or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse.

HEALTH AND SAFETY

Vendor will conduct its operations in compliance with applicable health and safety laws and regulations and provide its workers with a safe and healthy work environment.

ENVIRONMENT

Vendor will comply with all applicable environmental laws, regulations and standards and minimize any adverse impact on the environment. Vendor must endeavor to conserve natural resources and energy, and reduce or eliminate waste and the use of hazardous substances.

CALOBRI s.r.l.

Con socio Unico
Via Newton 4 – 20019 Settimo Milanese (Milano) Italy



FAIR DEALING AND COMPETITION LAWS

Supplier will not engage in collusive bidding, price fixing, price discrimination or other unfair trade practices in violation of applicable antitrust or competition laws. Supplier will uphold fair business standards in advertising, sales and competition.

PROTECTION OF INTELLECTUAL PROPERTY

Supplier must respect intellectual property rights, including patents, trademarks, copyrights and process designs, and safeguard Calobri confidential and proprietary information. Any transfer or sharing of technology or know-how must be done in a manner that protects intellectual property rights and is in compliance with local laws, including export laws, concerning data privacy and security.

DATA PRIVACY AND SECURITY

Vendor will comply with all local laws concerning data security and privacy, and will protect and safeguard data provided by Calobri, which may include private and sensitive personal information. Any transfer or sharing of data must be done in a manner that protects such information from inadvertent or unauthorized disclosure and any disclosure must be in compliance with local laws.

MONITORING AND RECORD KEEPING

Vendor must maintain all documentation necessary to demonstrate its compliance with this Supplier Code and provide Calobri with access to those documents upon Calobri's request for review. Neither Calobri nor any of its affiliates or authorized agents assumes any obligation or duty to monitor or ensure compliance with this Vendor Code. Vendor is solely responsible for compliance with this Vendor Code by its officers, directors, managers, employees, representatives and agents.

VIOLATION OF THIS SUPPLIER CODE

If a Vendor violates any of the requirements contained in this Vendor Code, Calobri may immediately terminate its supply relationship with that Vendor. Violations of this Vendor Code should be reported to one of the following two confidential options:

- (1) By Telephone:
- (2) By Internet: www.Calobri.com

Last Updated: September, 2017