

GEOX

Code of Conduct

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Preface

Geox pays constant attention to the technological evolution of products and services, allowing the Group to achieve the highest possible quality standards.

Innovation must be the result of a process open to all stakeholders and is achieved by exploiting the best ideas applied through study and experimentation.

Every innovation achieved directly or indirectly by Geox aims at increasing sustainability, an essential element of corporate continuity. Innovation must be the result of exploiting the most advanced technology and seeking solutions that guarantee the excellence of Geox products and services, at the same time as improving social and environmental performance.

Geox pays careful attention to ensuring that its own activities reflect ongoing Responsible Innovation, so that the solutions adopted today do not create problems for the future.

Geox is committed to ethical business practices in all its operations in order to maintain its reputation and the trust of its customers.

Geox believes in the importance of running a socially responsible business, by promoting fair and sustainable in-house employment practices and by ensuring diversity and equal opportunities in the workplace, both as part of its own operations and across the whole supply chain.

The purpose of this Code of Conduct is to establish and to ensure that all Geox suppliers comply with the company's minimum requirements in terms of compliance with the law, business ethics and integrity, human rights, working conditions, health and safety and environmental issues in all facilities in which Geox suppliers operate. In particular, this Code aims to promote fair working conditions and responsible management of social issues throughout the Geox supply chain. All suppliers are expected to establish and maintain a system that is able to ensure compliance with the present Code of Conduct, which includes providing this document to their own workers and supply chain.

The content of this Code of Conduct is based on the Group's Code of Ethics which is available on the company website www.geox.biz.

Suppliers will be notified of any updates to the Code of Conduct.

Recipients and expectations

The values and principles of conduct contained in this Code apply to the whole supply chain, including sub-suppliers, subcontractors and suppliers of materials and components. These requirements equally apply to permanent, temporary and agency workers, as well as to workers who receive a salary, piece rate pay or hourly pay, legally-accepted young workers (minors), and part-time, night shift and migrant workers.

Geox expects all of its suppliers to adhere to this Code both when conducting business with Geox and in operations involving their other business relationships.

Geox suppliers shall be committed to comply with all national and local laws, regulations, current contractual agreements and requirements in all the countries in which they operate.

Geox suppliers shall also recognize international standards and the fundamental labour conventions issued by the International Labour Organization (ILO).

By accepting this Code, suppliers commit to behave in accordance with the values, principles and rules of conduct described both in this Code and in the Geox Code of Ethics.

General principles and ethics

Geox is committed to a number of key values, which are reflected in the principles contained in its Code of Ethics, listed below:

- a. Enthusiasm and dynamism with a view to achieving continuous improvement;
- b. Believing in one's own ideas and innovative projects;
- c. Confidence in actions taken;
- d. Legality, honesty and integrity;
- e. Serious and responsible behaviour;
- f. Protecting and respecting human resources;
- g. Environmental protection.

For further information on these principles, please refer to the Group's Code of Ethics, available at www.geox.biz.

For any questions or queries relating to the present Code of Conduct, please contact the Purchasing/Sourcing Department representative and/or the Group's Internal Audit Department (internalaudit@geox.com).

A copy of the present Code of Conduct should be made available to all suppliers' employees.



CHAPTER I

WORKING CONDITIONS

Working Conditions

Humans Resources procedures

Geox suppliers are expected to comply with:

- a. all applicable laws and regulations of the country in which workers are employed, including those at federal, state/provincial and local community level;
- b. the Geox Code of Ethics;
- c. the Geox Suppliers' Code of Conduct;
- d. collective bargaining agreements, where applicable.

If there are differences or conflicts between standards, suppliers are expected to comply with the one that is most favourable for employees.

Relevant national or regional labour laws should be displayed in the local language and must be easily accessible for workers. If existent, the laws on display should cover areas such as: the minimum wage, overtime rates, working hours, leave, limits on overtime, etc.

All workers are hired with a written employment contract in the local language. Workers must receive a copy of the signed contract, written in their own spoken language.

Geox suppliers shall educate illiterate workers with regard to HR policies, employment contracts and wage calculation.

Child labour and young workers

Geox suppliers shall always employ workers in accordance with local legal requirements in terms of age of employment and according to ILO convention no. 138/1973.

All young workers, from legal age up to 18 years old, are prohibited from carrying out hazardous activities, working overtime or doing night shifts. All other local legal restrictions on employing workers under the age of 18 must be applied.

All young workers must be easily identifiable through a different uniform colour, a different badge, a specific employment register, or any other suitable measure.

Upon request, Geox suppliers must provide documented evidence of their compliance with child labour rules, also for audits carried out by the competent authorities or supply chain audits (social audits).

Forced labour, coercion and harassment

Geox suppliers shall not use any form of forced, illegal or involuntary labour.

Geox suppliers shall treat workers with dignity and respect and shall ban any form of corporal punishment, threats or practices involving physical violence or other abuse.

All Geox suppliers should have clear policies in place on the unacceptability of harassment and abuse by supervisors, as well as procedures for workers to be able to report any such incidents.

No restrictions shall be applied that may interfere with the worker's right to leave the factory compound or the housing facility during their free time.

There should be no cases of security guards putting pressure on the workforce.

Employees shall be free to resign and leave the company in accordance with local law. Employers must not indefinitely keep original documents belonging to employees, such as ID cards, passports or birth certificates.

Monetary deposits shall not be requested from employees.

No prisoners are to be used to carry out work.

Discrimination

When hiring workers, Geox suppliers shall not engage in or support any form of discrimination in terms of gender, sexual preferences, race, ethnic origin, religious beliefs or political affiliation. There must also be no form of discrimination in terms of remuneration, access to training, access to factory facilities, working conditions or any other matter.

Migrant workers shall have exactly the same entitlements as local workers. Employers must cover any commissions or other fees in connection with the employment of migrant workers.

Pregnancy tests shall not be a condition of employment. Workers shall not be forced or pressured into using contraception. Workers who take maternity leave, for the amount of time provided for by local and national laws, shall not face dismissal or threat of dismissal, loss of seniority or deduction of wages, and must be able to return to their former employment.

Freedom of association

Geox suppliers shall grant workers the right to form or join trade unions, where this is permitted by local law, and the right to sign collective bargaining agreements.

All workers are free to choose their trade union.

Trade unions have the right to perform their activities during working hours, as stipulated by local law, and shall not be subjected to any form of discrimination.

All workers have the right to express their opinions or suggestions, by sending a letter or e-mail, or through any other channel identified by the Company.

Geox suppliers shall develop and implement effective grievance mechanisms to resolve internal industrial disputes and employee claims, and to ensure effective, respectful and transparent communication between employees, their representatives and the management.

There can be no retaliation against the right to strike and no cash compensation may be offered to workers to prevent a strike.

Wages and working hours

All workers (regular workers, probationary workers, etc.) are provided with at least the minimum wage pursuant to local law or any existing collective bargaining agreement (where this provides for a better minimum wage).

Suppliers shall properly calculate workers' wages and overtime and pay them in a timely manner according to local law and any existing collective bargaining agreement, providing for adequate audit trails. A clear wage slip must be provided to all employees.

Legally-required income security benefits must be provided (workers' compensation, medical cover, social security, retirement funds, etc.) and paid to the appropriate agencies in a timely manner, in accordance with local laws. All wage deductions for voluntary savings programmes, loan payments, etc., are voluntary and are deposited in full into legally defined accounts. No unfair deductions are permitted.

Workers shall be granted and properly compensated for any types of paid leave to which they are legally entitled, including annual leave, maternity/parental leave and sick leave.

Geox suppliers shall ensure that working hours, including overtime, do not exceed the legal daily/weekly/monthly/quarterly/annual limits permitted by local law.

Workers shall be provided with at least one day off in each seven-day period.

Overtime shall be voluntary and must always be compensated at a premium rate.

Disciplinary practices

Geox suppliers shall not use any kind of physical violence as a disciplinary practice.

Disciplinary procedures must be documented and made available to all workers in the local language. Procedures must comply with all applicable local laws or collective bargaining agreements, if the latter provide better protection for workers.

All disciplinary actions must follow the procedure adopted.

“Suppliers are required to protect the human rights of their employees, treating them with dignity and respect”

CHAPTER II

QUALITY, HEALTH AND

SAFETY

Quality, Health and Safety

Quality requirements

Geox suppliers are committed to fulfilling quality requirements, generally recognized or specifically agreed in contracts, in order to provide goods and services that are able to meet Geox's needs and expectations in terms of functionality, and that are safe to use.

Geox suppliers shall provide information on the safety risks identified in the workplace and must properly train their employees to ensure appropriate measures are taken to avoid them. Suppliers are committed to identify and verify possible and potential emergencies at work, and to reduce their impact to a minimum by adopting emergency plans and response procedures.

Health & Safety

Geox suppliers should have a documented procedure in place for identifying workplace hazards and assessing their risks. Specific emergency plans and response procedures must be defined according to the risk assessment. Geox suppliers shall periodically assess the environmental and social impact of their operations on the local community.

An Health & Safety manager should be appointed to ensure a safe and healthy work place for all staff.

All personnel must be kept informed and trained on health and safety at work through the provision of regular and specialist training related to the nature of the risks to which workers are exposed (e.g. employees working in contact with electricity must be properly qualified).

General work facility

Geox suppliers shall ensure that buildings and premises where production activities are carried out comply with applicable local laws and regulations, and comply with legal construction requirements.

Every Geox supplier shall periodically carry out a specific building structural inspection.

Geox suppliers shall ensure that the work environment is adequately ventilated, without dust, and has adequate lighting, a comfortable temperature and access to clean drinking water (periodically checked).

Geox suppliers must periodically test the working environment (temperature, light, noise, ventilation, dust, air healthiness, asbestos etc.).

Geox suppliers shall ensure an adequate number of toilets in compliance with applicable regulations. The doors must be lockable and there must be different restrooms for male and female workers, which are to be kept clean. The electrical systems, heating and cooling, etc. should be periodically and correctly maintained keeping evidence of every activity performed.

Wiring, circuit boxes and electrical devices must be properly marked and kept in good condition. Electrical wires and outlets must be maintained in good condition.

Every machine must be in compliance with the safety requirements and provided with a maintenance record, a valid inspection certificate (where applicable) and safety instructions in the local language. Protective devices and preventive measures must be properly in place. Any machines that are out of order are to be properly labelled to avoid them being used.

Emergency preparedness

Emergency lights and fire alarms must function correctly and emergency routes and exits must be clearly indicated in the local language and kept free at all times.

Geox suppliers shall provide fire-fighting equipment positioned according to fire risks and must be regularly inspected and well maintained according to the local law, easily accessible and well distributed.

Geox suppliers shall conduct a regular fire drill as per applicable local law, which must be documented and must involve all workers.

A list of emergency telephone numbers must be easily visible to all workers.

Appropriate first aid equipment must be available and, where legally required, a qualified doctor and/or nurse should be available during working hours.

Geox suppliers shall appoint a first-aid team and provide them regular training.

An accident/incident report must be kept up to date and reviewed for any possible corrective actions by senior management.

Occupational injury

Adequate steps shall be taken to prevent accidents or injuries arising from, associated with, or occurring during work, by minimizing, as far as is reasonably practical, the causes of hazards inherent to the working environment.

Geox suppliers shall provide their workers with protective equipment as required by applicable law and industry standards at no cost for the worker (PPE - Personal Protective Equipment). Every worker is required to use their personal protective equipment during working hours.

Where a specific risk for eye accidents exists, eye wash stations must be adequately located in the workplace.

Work clothes shall be provided to workers as per applicable local law.

Safety hazards

Suppliers shall implement procedures to identify, evaluate and monitor workers' exposure to safety hazards. Moreover they must comply to all Health & Safety laws and regulation in force during the contract execution.

Special appliances such as boilers, unfired pressure vessels and furnaces must be properly registered, inspected and maintained.

Special equipment operators shall be properly trained on safe operating procedures and licensed, where applicable.

The use of personal protective equipment (PPE) is required to reduce safety hazards, and shall be provided to employees free of charge.

Suppliers shall monitor employees to ensure that they correctly use the personal protective equipment (PPE) required.

Production employees must have a understanding of the workplace safety hazards, hazard control programmes and safe working procedures.

Chemical and hazardous materials

Chemical materials must have the relevant MSDS (Material Safety Data Sheet) available in the local language and regularly updated. Moreover instructions provided therein must be followed.

Chemical containers must be properly labelled and safely stored.

Chemicals must be used either in presence of a aspiration system or in separate rooms and all possible measures must be taken to avoid any chemicals leaking on the production floor or into soil. Any flammable chemicals must be stored separately from the production floor. Any chemicals must be stored separately in the proper rooms or fireproof cabinet following the instruction contained into the MSDS.

Dormitory and/or canteen facilities

If a Geox supplier provides dormitory and/or canteen facilities, these must comply with local law and community requirements. All the requirements stated in the present Code of Conduct shall also apply to dormitory and/or canteen facilities.

“Suppliers are required to provide safe and healthy working conditions, as well as operating in a responsible and efficient way with regard to the environment and animal welfare.

Suppliers are required to integrate quality into their business processes”



CHAPTER III

**CONSERVATION OF
RESOURCES AND
CLIMATE PROTECTION**

Conservation of resources and climate protection

Geox suppliers are required to use natural resources (e.g. water, energy sources, raw materials) economically. Negative impacts on the environment and the climate must be reduced or eliminated at the source, or through practices such as changes in production, maintenance and plant processes, as well as the replacement, conservation, recycling and re-use of materials.

Suppliers are committed to develop and use climate-friendly products and processes that reduce energy consumption and greenhouse gas emissions.

Local environmental impact

Geox suppliers shall adopt environmental management practices to minimize the use of water, energy and other natural resources, to minimize all forms of discharge and waste, and to progressively reduce adverse impacts on the environment.

Suppliers shall comply with all local applicable laws and regulations regarding the protection and preservation of the environment and local community.

Facilities should be built or converted so as to ensure their harmonious integration into the local context, whether natural or man-made, and in accordance with local laws and regulations.

Chemicals and hazardous substances

Any chemicals must be used in compliance with the law and no banned chemicals are to be stored in the workplace.

Chemical storage tanks must be protected with barriers to prevent any accidental damage and must be kept in good condition (with no signs of leakage, excessive damage, etc.).

Any chemical fill points must have secondary containment.

All Geox suppliers shall limit the presence of chemical respecting the accepted levels defined in the RSL (Restricted Substances List) defined by Geox.

Waste management

Any waste, especially hazardous waste, must be handled in a responsible manner and in accordance with relevant laws and regulations, whichever are stricter.

Geox suppliers must have the relevant environmental permits and licenses for their operations. Such permits shall be aimed at preventing soil, water and air pollution and shall be accompanied by relevant implementation procedures.

Geox suppliers must complete and document a comprehensive hazardous waste assessment regarding all potential hazardous waste streams.

Employees managing hazardous waste must: a) understand the hazards associated with the hazardous waste, b) work in a manner that protects themselves, others and the environment from the associated hazards.

Every hazardous waste storage area must: a) be secured, b) be protected and covered, c) have secondary containment, and d) be inspected at least weekly.

Geox suppliers shall provide proper documentation showing the final destination of hazardous waste and shall arrange appropriate disposal, recycling or treatment of hazardous waste.

Water management

All outgoing waste water from wet processes must be treated before it is discharged, in accordance with local laws. Only appropriate chemicals and waste are to be added to waste water streams.

Geox suppliers shall monitor any waste water discharges as required by law.

If an on-site water treatment plant is in place, rainwater must be discharged to a location other than the treatment plant or must be added at the right time during the process so that it does not negatively interfere with the treatment process.

If an on-site water treatment plant is in place, the personnel must understand the processes, equipment and testing required to operate the on-site treatment plant correctly.

Air emissions

All emissions must be managed in a proper and transparent manner in accordance with relevant local laws and regulations, whichever are stricter.

Geox suppliers shall provide a complete, accurate and reliable written inventory of air emission sources that identifies the source, type and amount of pollutants.

Air emission sources must be equipped with pollution control devices that remove or filter the contaminants prior to release, as necessary.

Animal welfare

Geox suppliers must respect animal welfare and work progressively towards adopting healthy and respectful practices towards animals, based on laws, regulations and on the best available technology and standards.

“All operation are performed taking into consideration any potential impact on the environment”



CHAPTER IV

BUSINESS MANAGEMENT

SYSTEMS

Business management systems

Geox suppliers are required to implement business management systems that facilitate compliance with current laws and promote continuous improvements in line with the expectations of this Code of Conduct. The aforementioned management systems must include the following aspects:

Production and subcontractors

Geox suppliers must accurately report on production forecasts and any possible overproduction issues relating to Geox products. Geox products may only be sold to Geox Group companies.

In case of overproduction, Geox suppliers are expected to destroy the quantity of Geox products exceeding the purchase order, unless different instructions are received from Geox.

If requested to destroy products, the supplier shall destroy all overproduced products, which must be certified by an independent third party approved in advance by Geox.

Geox requires all of its suppliers to respect this Code of Conduct and to be transparent with regard to the information they provide on their operations.

Geox suppliers must ensure proper identification of the source of raw materials.

Geox suppliers shall not use subcontractors for any part of the manufacturing process of Geox products without prior written consent from Geox.

In case of approved subcontracting, Geox suppliers shall ensure that subcontractors abide by this Code of Conduct and sign a copy of the Code of Conduct for acceptance.

Should subcontracting become necessary, Geox suppliers must immediately notify Geox of the issue.

Anti-corruption practices and regulatory compliance

All Geox suppliers must be in possession of a proper business license and maintain accurate financial accounting.

Geox suppliers shall enforce a specific anti-bribery policy in accordance with the Geox Code of Ethics.

Geox suppliers are expected to maintain high standards of integrity and are encouraged to share Geox's commitment to the principles of the Geox Code of Ethics. They shall not offer bribes, gifts, discounts or other unlawful or unethical payments or compensation in dealings with public officials or individuals in the private sector, including Geox employees or representatives, to influence any act or decision or otherwise to secure a business advantage.

Geox suppliers must comply with local regulations regarding corporate criminal responsibility.

Community

Geox wishes to be an active supporter of its local community and encourages all suppliers and their employees to get involved and also become active members of their local social and environmental communities.

“Suppliers are required to implement management systems that facilitate compliance with applicable laws and promote continuous improvements in line with the expectations of this Code of Conduct”



CHAPTER V

CODE IMPLEMENTATION

Code Implementation

Code communication and training

All suppliers are required to display the Geox Code of Conduct in an accessible place and frequented by all employees, both in English and in the local languages spoken by employees, supervisors and managers.

Geox suppliers are required to notify their entire supply chain of the principles contained in this Code of Conduct.

Suppliers are required to provide suitable training in order to give their managers and employees an adequate level of knowledge and understanding of the content of this Code of Conduct and applicable laws and regulations, as well as generally recognized standards. Evidence of the training should be maintained.

Monitoring and disciplinary measure

Compliance with this Code of Conduct is verified through:

- internal audits
- whistleblowing activities
- monitoring activities carried out directly by production and quality technicians.

Disciplinary measures may apply to suppliers who do not comply with the Code of Conduct, in proportion to the severity of the non-compliance. Extreme measures such as contract cancellation may apply.

Social Audit

Geox's Internal Audit department periodically carries out social audits.

The aim of this audit is to assess the level of compliance with the Code of Conduct and is based on its principles.

Suppliers must provide access to all the documentation requested in order for the audit to be carried out and provide access to **all** their facilities.

Should non-compliances be found during the audit, an appropriate corrective action plan must be defined and agreed upon between Geox and the supplier in question.

Failure to implement the agreed action plan shall represent an infringement of the Code of Conduct.

Whistleblowing

The Code of Conduct, like other corporate policies and procedures adopted by the Group, must be used as a guide and must not be understood as an exhaustive document that covers all situations that may arise during the course of operations. For any questions related to specific rules of conduct or for clarification on any subject mentioned in this Code, suppliers are invited to contact the Group's Internal Audit department (internalaudit@geox.com) or the contact person of reference.

If a supplier suspects or becomes aware of an alleged violation of this Code or any other improper conduct, it is required to report it using the channels envisaged and specified in the specific guidelines available from www.geox.biz.


All reports received are recorded and stored. They are then either filed away or checks are activated, with an explanation of the reasons that led to that decision. Where deemed necessary, reported incidents are subjected to the verification process and information is provided to the interested parties.

These reports, as well as any violation of the Code detected as a result of other assessment activities, are promptly assessed by the functions responsible for imposing any sanctions.

Geox undertakes to ensure that the identity of the reporting party remains confidential, without prejudice to legal obligations.

Geox Group does not tolerate any form of retaliation or discrimination, direct or indirect, towards individuals who report issues in good faith and avoids any form of retaliation or discriminatory dismissal.

“Any alleged violation to the present Code of Conduct must be reported”



	SUPPLIER	GEOX SPA
Name:		
Department:		
Signature:		
Date:		