

CAMPARI GROUP SUPPLIER CODE

Approved by Head of Global Procurement, Davide Campari – Milano S.P.A. on 1 March 2018

Administrative information
Content Owner: Global Supply Chain

1. General disclosures

Our Commitment

Campari Group has always been committed to responsible and sustainable behaviour, which it considers of fundamental importance for company growth, and to doing business with the utmost integrity and correctness. To meet the challenge of ensuring a sustainable and successful business in the long term, the Group has an ongoing commitment to respecting human rights and responsible business conduct.

Campari Group conducts its business following the general principles of correctness, loyalty and honesty; impartiality and the avoidance, and full disclosure of, actual or potential conflicts of interest; confidentiality; transparency; and completeness of information. The Group has expressed these principles in a Code of Ethics and Human Rights policy.¹

Thus, Campari Group increasingly makes responsible sourcing an integral part of its procurement and supply chain management processes. The Group supports sustainable sourcing and aims at the integration of social, ethical and environmental performance factors within its own supply chain.

As part of Campari Group's continuing commitment to sustainable business practices, we expect our suppliers to follow our standards, as set out in this document, and commit to enhancing environmental, social and ethical business practices.

The following standards establish the necessary requirements to be considered a Campari supplier. We expect our suppliers to enforce these requirements and to constantly monitor their own and their suppliers' compliance.

If suppliers do not comply with the requirement mentioned in this code, any agreement or supply relationship that may have been established may be terminated.

Scope of application

This code defines the non-negotiable minimum standards we expect our suppliers to adhere to. Therefore, it applies to all Campari Group suppliers and, by extension, to all the business relationships of Campari Group. Full observance of the rules provided in this code is an enforced part of any agreement between Campari Group and our business partners.

We expect our suppliers to take steps to ensure that all their employees and contract workers (including those engaged informally) understand and adhere to the requirements of this code.

We expect the provisions of this code to be extended to all our suppliers' partners and promoted within their own supply chain (sub-suppliers and third parties).

Legal compliance

Campari Group respects the principle of legality and, therefore, we strive to abide by all national laws and regulations in the countries in which we operate. We expect our suppliers to abide by all the national laws and regulations and to adhere to this code. Campari Group expects its business partners to provide evidence of their compliance with this code upon request.

¹ http://www.camparigroup.com/sites/default/files/downloadspage/20151111_codice_etico_eng_0_1.pdf
http://www.camparigroup.com/sites/default/files/downloadspage/campari_group_employees_and_human_rights_policy_-_en.pdf

In the event of differences between the content of our policies and national regulations, we expect our suppliers to conduct their business in accordance with the principles of our policies.

Campari Group reserves the right to verify suppliers' compliance with this code. If suppliers do not comply with the requirements set out in this code, Campari Group has the right to terminate any agreements without prior notice at our sole discretion.

2. Human rights and labour standards

Non-discrimination

Campari Group rejects all forms of discrimination, specifically discrimination by race, gender, age, language, nationality, ethnic origin, religion, sexual orientation, inheritance, trade union or political affiliation, personal or social status, disability and health status, and is committed to ensuring equal opportunities at work and in career advancement. Employees' hiring, training, pay, promotion, transfer and termination of employment are in no way influenced by discriminatory reasons. Campari Group will avoid working with suppliers accepting any forms of discrimination.

Forced Labour

Campari Group will not engage in or support the use of forced or compulsory labour – such as prison labour, debt bondage, trafficking or serfdom. The Group prohibits all forms of forced or compulsory labour and thus all employment relationships must be voluntary in nature. Campari Group will not work with suppliers or employment agencies that make use of forced labour in their operations.

Child Labour

Campari Group does not tolerate child labour under any circumstances. We support the rights of the child, including the right to education, the right to rest and play, and the right for the child to have his basic needs met. Campari Group is committed to eradicating child labour from its supply chain. Any contracts with suppliers who encourage or employ children in any form of child labour will immediately be terminated. As assessed in the

Campari Group Employees' and Human Rights Policy, the Group follows the ILO² definition of the minimum age for employment. Where local laws set a higher age with regard to the definition of a child, Campari Group will abide by the local laws.

Harassment

The Group is committed to guaranteeing the best possible working conditions in order to safeguard employees' health, safety and psychophysical integrity, with respect for each individual's personality. Campari Group values a work environment that respects the personal and professional dignity and worth of each individual. Harassment, in whatever form, is considered unacceptable and will not be condoned. We expect our suppliers to enforce a similar approach against harassment.

Working Conditions

Campari Group treats all employees fairly and honestly regardless of where they work. All staff will have a written contract of employment, with agreed terms and conditions. All staff are entitled to receive reasonable rest breaks, access to toilets, rest facilities and drinking water at their place of work, and holiday leave in accordance with the legislation of the country where they work. All employees are provided with appropriate job skills training. Campari Group strives to provide workers with a pay and benefits package that supports an adequate standard of living. Moreover, programmes aimed at providing healthier lifestyles

² The ILO Convention No. 138 on the minimum age for admission to employment and work, available at «<http://www.ilo.org/ippec/facts/ILOconventionsonchildlabour/lang--en/index.htm>».

are encouraged and facilitated in the Group's offices and plants. Campari Group will always comply with local laws, regulations and/or local customs with regard to working hours, overtime

and minimum wages. Campari Group expects its business partners to comply with local legislation on working conditions.

3. Environment

Campari Group carries out its operations in compliance with the environmental laws, regulations and policies adopted by the competent authorities in the countries in which it operates. The company promotes the development of environmentally sustainable behaviour because environmental and climate protection and energy efficiency are important corporate objectives.

We expect our suppliers to continually strive to reduce their environmental impact and manage their natural resources efficiently. This includes implementing measures to prevent pollution, minimise the use of energy and the production of waste, and manage water responsibly. Suppliers shall ensure continuous improvements in their overall environmental performance and shall be

committed to working with their own suppliers to enhance environmental performance throughout the product supply chain.

We also expect our suppliers to abide by the local laws and regulations on air emissions, noise, pollution, and ground and water discharge.

4. Health and safety

Suppliers shall provide a safe and healthy working environment for their employees, and their health and safety policies must, as a minimum, meet legal requirements. Suppliers must strive to eliminate risks of accident and injury, as well as exposure to health risks and develop, where required, effective systems for informing and training employees on safety matters.

5. Implementation

Campari Group is committed to ensuring the broadest possible dissemination of the code's principles across the entire company and has made the code available in seven languages (English, French, Spanish, Italian, Portuguese, German and Russian).

We ask all our contractors to comply with the provisions of the code and monitor such compliance. Any violation of the Supplier Code must be reported to line managers, or directly through Campari Safe Line, Campari's whistleblowing service.

6. Grievance mechanism

Campari Group takes malpractice and misconduct seriously and is committed to facilitating an open culture where employees and contractors can freely report their concerns. Consequently, as established by the UN Guiding Principles on Business and Human Rights (principle 31)³, we are committed to providing grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights-compatible, and based on engagement and dialogue. This is why Campari Group provides an external whistleblowing service available

³http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

in several languages and reachable via phone, email, fax or online platform ensuring the utmost confidentiality⁴. Anyone witnessing safety, legal or ethical issues can speak up through this service. For more detailed guidelines about how to use the whistleblowing service, see Appendix 1.

7. Monitoring activities

As an active member of Sedex Advance, Campari is willing to use one of the largest collaborative platforms in the world for buyers, suppliers and auditors. The Sedex platform enables Campari Group and its suppliers to manage performance on labour rights, health & safety, environment and business ethics.

Campari Group reserves the right to verify suppliers' compliance with this Code, to monitor their performance and operations in this regard, and to terminate any agreements in the event of violations of the Supplier Code, if considered necessary.

8. Relationships with suppliers and other counterparts

Recipients of this code must ensure that their personal interests do not determine their choice of contractual counterparts or influence the content of agreements with counterparts.

The selection of suppliers and other counterparts in general, and the formulation of contractual conditions, are based on the values of correctness, impartiality and fairness in pricing, quality of goods and/or services, by comparing the various offers present on the market and carefully assessing the guarantees provided regarding the precise fulfilment of their commitments.

Purchasing processes must seek to identify the best competitive advantages of the Group, ensuring loyalty and impartiality in relation to all suppliers in possession of the specified requirements, and excluding all forms of discrimination.

The stipulation of a contract with a third party must always be based on relationships of extreme clarity, avoiding, wherever possible, entering into a contractual commitment that results in a form of dependence on the supplier.

Before establishing business relationships with third parties, code recipients must adequately analyse the available information, including that of a legal and financial nature, about the counterparts and suppliers in order to verify their respectability and legitimacy in relation to the type of operation proposed.

In all cases, they must not accept gifts or favours, the value of which, taking into account the circumstances under which they were offered, could have even a slight impact on the selection of supplier or counterpart or the conditions of the contract.

⁴ Campari Safe Line is reachable via email (camparisafeline@expolink.co.uk), phone (country number + 22672), mail (Expolink Europe Ltd. 1 1 Greenways Business Park Bellinger Close, Chippenham, Wilts SN15 1BN), or online platform (www.expolink.co.uk/campari)

Supplier (Vendor) Name _____

Vendor Number _____

Surname and Name of person and Position _____

Date of signature _____

Signature _____

Appendix 1 Campari Safe Line Whistleblowing Service

How to reach Safe Line

 24/7/365

Dial your country number (see below) and enter access code 22672 :

Country	Number	Country	Number
Argentina	0800 666 0077	Jamaica	18006995002
Australia	1800199251	Japan	00531 44 0046
Austria	0800 281 161	Mexico	01800 123 0179
Belgium	0800 80384	Netherlands	0800 024 9798
Brazil	0800 891 9677	New Zealand	0800 449172
Canada	1 8777 475 307	Peru	0800 527 68
China	10800 440 0163 (TELECOM) 10800 744 0163 (UNICOM) 4001 204952 (LOCAL CHARGE)	Russia	810 800 2258 1044
Germany	08000 826 718	South Africa	0800 99 1396
Great Britain	0800 297 0105	Spain	900 811498
Greece	00800 441 45224	Switzerland	0800 56 1580
Ireland	1800 946823	Ukraine	*
Italy1**	800 920034	USA	1 866 516 3413
Italy2**	800 794953		

 **Send a mail:**

Expolink Europe Ltd
1 Greenways Business Park,
Bellinger Close, Chippenham,
Wilts SN15 1BN

@ **Send an e-mail:**
camparisafeline@expolink.co.uk

 **Send a fax:**
0044 (0)1249 661 608

 **Web reporting:**
www.expolink.co.uk/campari

*If you are calling from Ukraine, dial the number 0044 1249 661 808 and ask Expolink operator to call you back

**Select Italy1 if you prefer to speak Italian, English, or French, and Italy2 if you want to speak Spanish, Portuguese, German, Russian, or Mandarin.