

	<h2>CODE OF CONDUCT</h2> <h3>(page 1)</h3> <h4>INSPECTION, AUDIT & ASSESSMENT</h4> <h4>Factory Integrity Acknowledgment</h4>	<p>Bureau Veritas Consumer Products Services Pvt Ltd, 7F Octa Tower, 8 Lam Chak Street, Kowloon Bay, Kowloon, Hong Kong.</p> <p>Tel: +852 2418 1222 www.cps.bureauveritas.com</p>
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Inspection / Audit No.:	1019C181652
Factory / Supplier:	PORTOFINO CORNA & FRATELLI SCL
Inspection / Audit Date:	07/01/2019

Dear Supplier,
Bureau Veritas, Consumer Products Services Division provides independent, impartial and objective assessment and inspection services for our global clientele. Our assessment and/or inspection findings will be duly recorded and reported to our clients. We request your cooperation to enable us to effectively execute this process.

We operate a strict Code of Ethics, which prohibits the direct or indirect acceptance of gifts, payment or benefit in any form. This Code of Conduct letter is presented to the management of your facility for the purpose of setting out acceptable conduct whilst our representatives perform their job at your facility. We ask that you read this document and sign it to confirm your understanding and agreement.

1. Never, under any circumstances, give in to demands or requests for benefits or payments from a BV representative. If a BV representative asks for any direct or indirect benefit, you must contact the BV office at the contact details below.
2. Never, under any circumstances, collude or offer a facilitation payment, bribe, gift or any other benefit to a BV representative. Any benefit given to a BV representative will be construed as a corrupt practice and will be reported to our client. This includes "tea money", "hardship appreciation", or any other benefits regardless of the actual value.
3. BV is committed to fully complying with local laws and regulations, including such on anti-corruption and bribery. Where appropriate, BV will not hesitate to alert or cooperate with law enforcement authorities on suspected or actual offenses.
4. Do not put any undue pressure on our representatives to execute their work if conditions stipulated by the client are not met.
5. Do not put any undue pressure on our representatives to amend the results or recording of their findings.
6. During the work execution, our representatives may be required to take photos of the factory facilities, products being inspected or assessment/inspection processes in order to validate findings. Please ensure this process is not obstructed. Documents, pictures, or any other information gathered during the course of the BV service will be kept confidential.
7. Provide a safe environment that allows BV representatives to do their job properly. This may mean assistance with locating, moving and opening cartons for inspections. For audits it may mean arranging private and confidential employee interviews in a suitable place. It also means pointing out any safety hazards, and providing appropriate personal protective equipment and necessary training regarding any risk that may be encountered. BV representatives will check the working environment in accordance with BV's safety requirements in the "2 Minutes for my safety assessment form". In case potential risks are identified, which may jeopardize auditors' and inspectors' health or safety, they have the right to discontinue the services if you cannot eliminate such risks.
8. We require a factory representative to sign the report prepared by our representatives to acknowledge the execution of their work and findings. In some cases we are asked by client to submit hand written reports and digital images from the factory and would request that our representatives use your facilities.
9. With regards to inspections, our representatives will request to take shipment samples for verification.
10. Trainee(s) may accompany senior inspectors /auditors on the visit to your factory. If needed, an interpreter may also accompany the BV representative. Their presence will neither result in additional charges to you, nor affect the final results.
11. To enforce our integrity policy, we may send mystery inspectors/auditors to perform services and report to our client any form of benefit offered by the factory.
12. If in doubt on any issues, please contact our offices or as specified in the address box below.

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CODE OF CONDUCT
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INSPECTION, AUDIT & ASSESSMENT
Factory Integrity Acknowledgment

Bureau Veritas Consumer Products
Services Pvt Ltd,
7F Octa Tower, 8 Lam Chak Street,
Kowloon Bay, Kowloon, Hong Kong.

Tel: +852 2418 1222
www.cps.bureauveritas.com

PART 1: Factory declaration (To be filled by the factory once BV COC is explained by the BV staff).

We confirm that we received the BV Code of Conduct and that the contents were explained by the BV representative, Mr. / Ms. RICCARDO GRASSO on 07/08/19 at 9:30 and we understand the contents, spirit and intent of the BV procedure on Integrity.

[Signature]
Signature of Factory Representative

035-832993
Factory Representative's contact number

PART 2: Factory declaration (To be filled by the factory after completion of the service):

Item	Please declare if benefits were offered to the BV staff ✓	Yes	No	Item	Please declare if benefits were offered to the BV staff ✓	Yes	No
A	Meals	<input type="checkbox"/>	<input checked="" type="checkbox"/>	B	Transportation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C	Accommodation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	D	Money	<input type="checkbox"/>	<input checked="" type="checkbox"/>
E	Gifts	<input type="checkbox"/>	<input checked="" type="checkbox"/>	F	Other Benefits/Favors	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Explain details of free or subsidized benefits offered							
G	Please declare about use/role of consultants ✓	Yes	No	Explain details of the consultant			
Were you contacted by a consultant for this inspection/audit?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	If yes, please specify when, who and why.			
Have you used a consultant's services for this inspection/audit?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	If yes, please specify when, who and why.			

We acknowledge that the above information is true and accurate. We understand that BV could and will report to program clients and/or law enforcement authorities any suspected improprieties or illegal activities.

[Signature]
Signature of Factory Representative
07/08/2019
Date and Time

RICCARDO FEATINI / SALES MANAGER
Name and Designation

Bottonificio COBNA & FRATUS
Via Cesare Battisti
Tel. 035.832993 - Fax 035.832419
24064 GRUMELLO DEL MONTE (BG)
C.F. e P. IVA 00608560165

Please contact the following to make any complaints or suggestions:

Complaints mailbox:	Ethics@hk.bureauveritas.com
John Kerk Vice President & General Counsel, Asia Divisional Global Compliance Officer	Tel: +852 2494 4644 Email: john.kerk@hk.bureauveritas.com
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