



**ZOBELE
GROUP**

Social Responsibility Policy

Smart solutions for an easy life.



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Our Company has decided to adopt a Social Responsibility Policy in order to convey a clear message to employees, customers, suppliers, relevant communities and all other stakeholders regarding the way the Zobebe Group intends to pursue its vision.

A conscientious approach to the environment and people and the adoption of fair business practices has always been an integral part of Zobebe Group's history. Our Values and Code of Ethics have been developed to consistently sustain our approach to doing business.

We are facing tough challenges in achieving our goals for growth. These will only be achieved by fully respecting our shared principles, which have been a defining guideline throughout the company's history of success. Therefore, we expect all Zobebe Group employees, suppliers, contractors and other people operating in the interests of Zobebe Group to fully respect the principles of this Policy as well as our Values and Code of Ethics.

Zobebe Group's Social Responsibility Policy is a pillar of Group sustainability and applies to all Zobebe Group employees worldwide, as well as, for all relevant matters, to Zobebe Group contractors, consultants, suppliers and partners.

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1. Zobele Group

1.1 Introduction

Zobele Group is specialized in the development and production of systems for the delivery of insecticides, air fresheners and other home and healthcare products applications, which are sold through the “business to business” (B2B) channel. Thanks to its commitment and capability to respond in a timely and efficient way to customers’ needs, Zobele Group has gained the trust and created consolidated partnerships with the larger multinational companies that sell those products in the consumer end market.

Zobele Group has set up development and commercial offices in different strategic locations, in order to better serve the interests of its customers and meet market demands. Production plants have been set up worldwide to ensure maximum efficiency in logistics and costs.

1.2 Vision, Mission and Values

Since 1919, Zobele Group has been a paragon of success, engaging in a long-term commitment towards customers, communities, employees and all other stakeholders. This commitment has been translated during 2010 into a shared Vision, Mission and Values.

- **Vision:** Every day making your home a better place to live.
- **Mission:** To be the preferred global business partner for innovative and cost-effective solutions for leading consumer brands.
- **Values:** **Teamwork:** Trust, respect and responsibility in working together.
Integrity: Doing the right things, actions & decisions in every circumstance*.

Passion: The desire to always make things better.

Excellence: Primary goal in all daily actions.

Recognition: Recognise individual and team contributions and achievements.

Zobe Group believes that these values allow it to achieve its goals of growth and sustainability.

**Integrity in Zobe refers also to the full respect of law and business ethics.*

1.3 Zobe Group Code of Ethics

Since 2007 Zobe Group has adopted a Code of Ethics to compel all individuals within the company to act according to the applicable laws and regulations and with the principles of fair competition, integrity, honesty, fairness and good faith, respect for customers, suppliers, competitors, the environment and society as a whole. Compliance by Zobe Group's people with the Group's Code of Ethics is an integral part of Zobe Group culture.



2. Corporate Social Responsibility

2.1 What is CSR?

“CSR means addressing the legal, ethical, commercial and other expectations that society has for businesses, and making decisions that fairly balance the claims of all key stakeholders”¹, so it “encompasses not only what companies do with their profits, but also how they make them. It goes beyond philanthropy and compliance in order to address the manner in which companies manage their economic, social, and environmental impacts and their stakeholder relationships in all their key spheres of influence: the workplace, the marketplace, the supply chain, the community and the public policy realm”².

CSR-focused businesses proactively promote public interest by encouraging community growth and development, and voluntarily eliminating practices that harm the public sphere.

2.2 CSR in Zobe Group

Zobe Group has made a commitment to the guiding principles of Corporate Social Responsibility by focusing on the following main areas of action.

1. *Business for Social Responsibility (BSR)*
2. www.ksg.harvard.edu/cbg/CSRI/home.htm

2.2.1 People

By “People” we mean all Zobebe Group employees in every plant, as they are the most valuable company asset. Every single person within our organisation plays an important role in our global team;

2.2.2 The Environment and the Community

Zobebe Group recognises that its obligation to leave a better world to the following generations is one of the Group’s top priorities;

2.2.3 “Business Practices”

All people acting on Zobebe Group’s behalf are committed to doing business in the interests of the Group with honesty and integrity and in full compliance with the values and ethical principles established by the company and in accordance with all applicable local laws. Zobebe Group requires every supplier to comply with these principles.



3. People

3.1 Human Rights

Zobe Group promotes the full respect of human rights, complies with employment laws in every country in which it operates, and does not exploit forced labour or tolerate any kind of physical punishment or abuse. Zobe Group does not support child labor, therefore does not hire workers under the age of 18 years. The Group complies with laws that prohibit every kind of unjustified discrimination based on race, colour, gender, national origin, age, religion, or disability. On the contrary, Zobe Group is an equal opportunities employer, selecting workers on the basis of professional qualifications and personal skills, without any type of discrimination. The Company endeavours to favour reciprocal cooperation and team spirit, to respect individual personalities; and to be free from prejudice, intimidation, coercion or psychological bullying and sexual harassment. Any behaviour violating those individual rights is strictly prohibited.

3.2 Labour Practices

Employees are selected, recruited, paid and organised on the basis of their skills and merit (in any case in compliance with the work contract in force and with applicable local labour laws).

In full compliance with the principle of non-discrimination regarding employment and occupation, the Group promotes the principle of equal remuneration for men and women.

The Company contributes in every way to employees' growth, encouraging skills development by implementing training and educational initiatives.

3.3 Industrial Relations

Zobebe Group recognises the lawful right to employees free association and the right to collective bargaining according to local laws and practices and supports employers' representative bodies. Zobebe Group examines and investigates any workers grievance pursuant to the appropriate relevant procedures.

3.4 Health and Safety

The Company endeavours to ensure maximum health and safety in the workplace for its employees and contractors. Zobebe Group health and safety policies are based on national legislation, international regulations and industry benchmarking. Zobebe Group applies the most demanding standards in all the countries in which it has operating sites.

Each employee is trained by the company on health and safety in the workplace and informed about his/her responsibility for observing the safety and health rules and practices that apply to his/her job.



4. The Environment and the Community

Zobebe Group is committed to safeguard the environment and to promote the social development of the communities in which it operates and to continuously improve product safety.

4.1 The Environment

The environment is a fundamental asset to the whole community and Zobebe Group is strongly committed to contributing to its protection. The company implements the most effective solutions in its production processes in order to avoid any kind of dumping or emission of harmful substances. Zobebe requires its Suppliers to share this sustainable behaviour.

4.2 The Community

Zobebe Group's presence in the communities in which it is located contributes to their social development and provides support in the efforts to achieve social improvements. Moreover, Zobebe Group's products help to improve the quality of its consumers' everyday life. To this extent, the Group supports any employee's voluntary work and local non-profit organisations, educational institutions and other local businesses that are striving to improve the lives of others by focusing mainly on children and the younger generation.

4.3 Product Safety

Product safety has always been one of the key values for Zobebe.

The Group develops and produces its own products, not only to meet functional requirements and aesthetic requirements, but also in compliance with the strictest norms on safety and quality, ensuring the required standards and pursuing the path of continuous innovation through significant and constant investment in research and development.



5. Business practices

5.1 Compliance and Ethics

Zobe Group promotes an ethical approach to business as a key element for ensuring effective operations and to improve the Group's credibility in the eyes of its shareholders, customers, suppliers, and in general, within the framework of the whole economy and social well-being of the communities in which it operates.

Full respect of the "Code of Ethics" is the first step in spreading this ethical approach throughout the Group.

5.2 Managerial Responsibility

Managers are expected to set an example for Zobe Group's high standards of ethical and responsible conduct and to create and support a work environment in which everyone knows that ethical behaviour is the norm. The Group shall avoid entering into business relations with third parties who have taken part in, or are reasonably suspected of having taken part in, criminal actions.

5.3 Conflicts of Interests

Every action performed by Zobe Group's employees must be based on sound business judgment and not be motivated by personal interest. Any situation which may involve a conflict of interest between any personal economic activities of people acting on behalf of Zobe Group and the work carried out within Zobe Group is to be avoided. In compliance with the "Zobe Group Code of Ethics", the relevant supervisor and local HR department must be informed of any circumstance in which a conflict of interest, even hypothetical, may arise.

5.4 Management of Internal and External Communication

With respect to internal communication, Zobebe Group ensures the total protection of employees' confidential information, and fully respects the privacy of the people concerned. Similarly, information and material obtained in doing work that is not generally disclosed and is valuable to the company (or to its competitors) must be protected and remains the sole property of the Group.

With respect to external communication, the dissemination of information shall be effected in compliance with the law and according to the criteria of transparency and truthfulness. In particular, all information communicated to the public administration must be true, correct, transparent and complete. Moreover, the Zobebe Group is committed to respecting confidential information provided by our customers, suppliers and other business partners.



5.5 Accuracy of Business Records

All financial books, records and accounts must accurately reflect transactions and events. Honest and accurate recording of information is extremely important and employees are responsible for recording them properly. Almost all business records may become subject to public disclosure in different circumstances (litigations, investigations etc.). Therefore, employees should attempt to be as clear, concise, truthful and accurate as possible when recording any information. Documents should be destroyed only in accordance with the applicable document retention policy, and never in response to or in anticipation of an investigation or audit.

5.6 Relationship with Customers

Zobebe Group focuses its activity on ensuring the satisfaction and safeguarding of its customers, paying particular attention to all of those requirements which could result an improvement in the quality of its products and services. In the relationships with its customers, the Group seeks to ensure fairness and respect for contractual obligations, in addition to the correct and diligent execution of contracts.

5.7 Relationship with Suppliers

Zobebe Group suppliers are important partners in the success of the Group's business and the relationships with them must be characterised by honesty and fairness. The company only does business with those suppliers, distributors and other business partners who demonstrate the same ethical and responsible business behaviour, and operate in compliance with the "Zobebe Group Code of Ethics".

5.8 Relationship with Competitors

The Group believes in free and fair competition, which represents one of its strengths: the Group's reputation is based on competitive results that reward ability, experience and efficiency. Zobele Group and its employees must conduct themselves in an honest manner in any business dealings. Any action aimed at altering the conditions of fair competition is contrary to the Group's policy and it is forbidden by any persons acting on its behalf.

5.9 Relationship with Public Administration

In relations with the public administration, Zobele Group is vigilant in ensuring that any act, conduct or agreement performed complies with the principles of maximum transparency, fairness and legality. As specified in the "Zobele Group Code of Ethics", the company avoids appointing a single person to any process, as a plurality of subjects and departments minimises the risk of acts not compliant with Group policies. Furthermore, Zobele Group favours a plurality of internal interlocutors regarding inspections and authorisations, to reduce the above mentioned risk.



5.10 Gifts, Presents and Benefits

No type of gift that exceeds normal business practices or courtesy, which is aimed at gaining favourable treatment in the carrying out of any activity linked to Zobe Group, may be accepted by Zobe Group employees.

It is also strictly forbidden to offer any public officer or his/her family presents with the purpose of influencing the impartiality of his/her judgment and/or soliciting any form of favouritism. Whoever receives gifts/benefits or is subject to solicitations for disbursement by public officers, public service providers, customers, suppliers or third parties, must inform his/her supervisor and the local HR department that will assess the situation and suggest corrective actions.

5.11 Information Technology

All use of information technology by Zobe Group respects applicable laws and regulations, safeguarding Company property and without infringing any third party copyrights.

5.12 Intellectual Property Rights

Zobe Group believes that the protection of intellectual property rights enhances investments in research and the progress of technology. Therefore Zobe Group protects its patents and trademarks by any appropriate IP policy, avoiding infringements of third party IP rights.



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