

Cicero Mfg. & Supply Code of Conduct

“A company’s code of conduct is often the foundation upon which an effective compliance program is built.” -A Resource Guide to the U.S. Foreign Corrupt Practices Act

As a third-generation family run company, Cicero Mfg. & Supply Company, Inc. (Cicero Supply) conducts its practices with the basis of family and familiarity developed through its more than sixty years in the industry. At Cicero Supply, our Ethical Code of Conduct has been created to embody and promote a safe and dependable work environment for both its vendors and customers, as well as its employees, requiring compliance with all applicable laws and regulations. Specifically, our Ethical Code of Conduct assures conducive working conditions, prohibits the use of child or forced labor, provides the protection of the environment and minimization of waste, emissions, energy consumption and the use of materials of concern and prohibit engagement in corrupt practices. Infusing necessary sensitivity to the environment, social sustainability, and governance, the Cicero Supply Ethical Code of Conducts reads as follows:

1. Employment is freely chosen

- 1.1 There is no forced, bonded, or involuntary prison labor.
- 1.2 Workers are not required to lodge “deposits” or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. Freedom of association and the right to collective bargaining are respected

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organizational activities.
- 2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3. Working conditions are safe and hygienic

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and potable water, and, if appropriate, sanitary facilities for food storage, shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. Child or forced labor shall not be used

4.1 There shall be no new recruitment of child or forced labor.

4.2 Companies shall develop or participate in and contribute to policies and programs which provide for the transition of any child found to be performing child labor to enable him or her to attend and remain in quality education until no longer a child; “child” and “child labor” being defined in the appendices.

4.3 Children and young persons under 18 years of age shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. Living wages are paid

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event, wages should always be enough to meet basic needs and to provide some discretionary income.

- 5.2 All workers shall be provided with understandable information about their employment conditions in respect to wages before they enter employment, as well as about the particulars of their wages for the pay period concerned each time that they are paid.
- 5.3 Deductions from wages as a disciplinary measure shall not be permitted, nor shall any deductions from wages not provided for by national law, be permitted without expressed permission of the worker concerned. All disciplinary measures must be recorded.

6. Working hours are not excessive

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 and 6.6 are based on international labor standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.*
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency, and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be no less than 125% of the regular rate of pay.
- 6.4 The total hours worked in any seven-day period shall not exceed 60 hours, except where covered by sub-clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any seven-day period only in exceptional circumstances where all of the following are met: this is allowed by national law; this is allowed by a collective agreement freely negotiated with a workers' organization representing a significant portion of the workforce; appropriate safeguards are taken to protect the workers' health and safety; and the employer can demonstrate that exceptional circumstances apply such as expected production peaks, accidents, or emergencies.
- 6.6 Workers shall be provided with at least one day off in every seven-day period, or, where allowed by national law, two days off in every fourteen-day period.

*International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.

7. No discrimination is practiced

- 7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, or political affiliation.

8. Regular employment is provided

- 8.1 To every extent possible, work performed must be on the basis of recognized employment relationship established through national law and practice.
- 8.2 Obligations to employees under labor or social security laws, and regulations arising from the regular employment relationship, shall not be avoided through the use of labor-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship, internship, or externship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. No harsh or inhumane treatment is allowed

- 9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse, or other forms of intimidation, shall be prohibited.

The provisions of this code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable law, and, where the provisions of law and this Ethical Code of Conduct address the same subject, to apply that provision which affords the greater protection.