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PRESENTATION OF THE TANNERY



The tannery **Ecopell 2000** s.r.l. has been constituted in October of 1999 with the target to bring to conclusion a productive project conceived in 1990: to recover the traditional vegetable tanning, improving the ancient productive process, handed down by our grandparents, with the new technologies and knowledges, to get hides with an added notable value, in terms of artisanship, recovery of our traditional tanning roots and the safeguard of the "Made in Italy."

The beginning was not of the simplest because the tannery ECOPELL 2000 SRL started to explore a part of the market considered of "niche" where the fidelity of the client has a very important role than in other tanning sectors. Therefore they looked for consumers that had never used that type of product proposing a particolar article made on a hide (shoulders) of good quality.

The first change however was when the actual holders, Alessandra Giannoni and Andrea Grossi started to follow this tannery in an exclusive way.

So the first articles of success were

born, the production had a sudden increase as the market welcomed the novelty of the so-called "natural" produc. A further change, that contributed to consolidate the success of these article, was also the use of ½ calves instead of the shoulders which had increased to an unbearable price also for that producers like us that aimed always at the best quality of the ended product.

This continuous increase in production has brought us to consider the hypothesis of moving into a new building which was more consonant with our new necessities.

So exactly on 15/09/06 we have transferred our productive center in the new establishment of Via del Trebbio Nord 41, always in Santa Croce S / Arno.

POLITICS FOR THE QUALITY, THE ENVIRONMENT AND THE SOCIAL RESPONSIBILITY

The Ecopell 2000 s.r.l., as competitive firm directed to the market, establishes as a strategic priority of its own production, the following points:

- the constant effort to satisfy the demands and the expectations of both the present and the potential clients for what concerns the quality of the products offer, the competitiveness of the prices, the respect of the contractual requisite;
- the continuous improvement of the business performances regarding the environmental point of view, the quality and the ethics of the work through the definition and the realization of specific objectives and programs;
- the involvement and the direct sharing, real and aware of the personnel of the organization in all the levels for the realization of the Management System;
- the attention to the human resources and the awareness of their role in the business dynamic, through the continuous formation, the development and the updating of the whole personnel;
- the maintenance of a good relationships with its own suppliers with the purpose of improving the effectiveness and

the efficiency of the process of purchasing and of creating an added notable value for both;

- the continuous improvement of its own environmental efficiency, considering the best available and economically acceptable technologies;
- the respect of the referring standards, the laws and the rules, both national and international, in the environmental field, concerning the quality of its products and the ethical management.

For such purpose and in conformity to the norm UNI EN ISO 9001: 2008, the Ecopell 2000 SRL has developed a system of Quality Management so that to submit it to evaluation and certification by an independent and accredited organism.

Such system develops a fundamental role in the control of the business process and besides constitutes a point of reference for all those people who operate inside the firm.

The politics for the quality, the environment and the social responsibility is published in the firm. The Direction of Ecopell 2000 srl commits itself to communicate, to carry out and to sustain this politics to all the levels of the organization, giving convenient means to create a suitable environment

for the correct carrying out of the activities and sustaining, the responsibility of the whole Personnel that operates in firm.

The Direction commits itself so that such Politics is diffused and made available to all the interested parts of the firm to the purpose of a more profitable collaboration with the same.

The Ecopell 2000 s.r.l. agrees with the Code of Behavior and Social Responsibility of the UNIC which is explained in the following pages.

SOCIAL CODE OF BEHAVIOR AND SOCIAL RESPONSIBILITY (SOCIAL ACCOUNTABILITY UNIC)

SOCIAL RESPONSIBILITY

1. CHILDISH WORK

- 1.1 The firm must not use or sustain the use of the childish work (developed by person under 16 years old).
- 1.2 The firm must safeguard in a particular way the minor ones from dangerous situations or harmful conditions for the health, both inside and outside the working place, respecting the indications in the normative in force.

2. FORCED WORK

2.1 The firm must not use neither sustain forced work and they must not require and hold back to the personnel, any deposits or original documents of identity for the carrying out of the working relationship.

3. DISCRIMINATION

3.1 The firm must not effect the discrimination in assumption, in remuneration, in the access to the formation, promotion, dismissal or retirement, based on race, national origin, religion, sexual orientation, syndical affiliation, age and every other discriminatory condition.

4. ASSOCIATION AND BARGAINING

4.1 The firm must respect the right of the whole personnel to form and to freely comply with labor unions and the right to the collective bargaining.

5. HEALTH AND SAFETY

- 5.1 The firm must guarantee an healthy and safe place of for working and they must adopt suitable measures to prevent and manage accidents and damages to the health.
- 5.2 The firm must name a representative of the direction that is a responsible of the implementation of the safety factors and health in the working place.
- 5.3 The firm must assure that the personnel receives an effectiveness formation in subject of health and safety during working, documented and periodic and that such formation is repeated for the new personnel or reassigned.

6. WORKING TIME

6.1 The firm must respect the laws and what is ordered by the National Collective Contract of work (CCNL) for the employees of the tanning industries and of the connected sectors in subject of working time.

7. REMUNERATION

7.1 The firm must guarantee that the remuneration always corresponds to the legal standards and the established parameters in the CCNL for the employees of the tanning factories and of the connected sectors. 7.2 The firm must guarantee that the composition of the remuneration and the indemnities is clearly and regularly indicated.

8. UTILIZATION AND VALORIZA-TION OF HUMAN RESOURCE

8.1 The firm promotes the professional valorization of the human resources through the development of the competences, of the culture of enterprise and the employement, also through initiatives of continuous formation.

9. ENVIRONMENT

9.1 The firm must establish and maintain active procedures and operational routine with the purpose to reduce the environmental effects connected with workmanships.

10. INVOLVING AND DEVELOP-MENT OF THE COMMUNITY

10.1 The firm must promote the development of the community through the dialogue and the collaboration with the interested parts, also through the associations of representation which it joins.

11. PROFESSIONALISM

11.1 The firm must conform to the principles of transparency, correctness and good faith in the relationships with institutions,

clients, suppliers, competing, avoiding disloyal actions in the market competition that brings damages and violate the principles of this code.

11.2The firm must guarantee the quality of the products and the protection of the consumer.

12. MANAGEMENT

- 12.1 The direction must formalize a business politics in subject of social responsibility to guarantee:
- a) The engagement to conform to the principles of the Code, to maintain the conformity to the applicable normative dispositions and to respect the undersigned accords;
- b) The engagement to the continuous improvement, particularly of its own organizational system;
- c) Its accessibility in comprehensible form to the whole personnel, included administrators and management;
- d) Its accessibility to the involved parts. Such politics must periodically be re-examines for verifying its suitability.
- 12.2 The firm must name a representative of the direction that, independently from other possible responsibilities, can assure the respect of all the requisites of the present document (is also seen 3.2).
- 12.3 The firm must guarantee that the operational personnel chooses a representative among its mem-

- bers with the assignment to facilitate the relationships with the direction in subjects connected to the present document.
- 12.4 The firm must establish and maintain active appropriate procedures for the evaluation and the selection of the suppliers and the tertiary cooperation on the base of their ability to answer to the requisite of the present document and to give documented evidence of it.
- 12.5The firm must establish and periodically re-examine the business objectives in relationship to the requisite of the present Code and to foresee procedures to communicate its performances to all the interested parts.
- 12.6 The firm must guarantee inside that all the requisite of the Code are inclusive and realized with efficiency.
- 12.7 The firm, in case of non-conformity or open legal issues on the themes object of the present document and to the goals of their resolution, must show with objective evidences one suitable management of them through corrective actions. The firm has besides to predispose preventive actions with the purpose to avoid their repeatition.
- 12.8 the firm must maintain appropriate documentation attesting the conformity to the requisite of the present document.





SOCIAL ACCOUNTABILITY

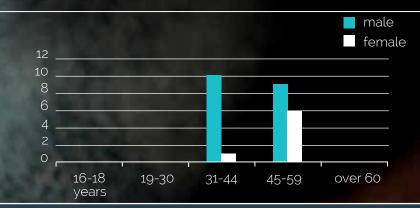
CHILDISH WORK

Ecopell 2000 SRL doesn't use or support childish work.

The whole personnel of the Ecopell 2000 srl is hired in conformity to the National normative in force and must be of age. In case which contracts of apprenticeship were effected with young workers, Ecopell 2000 srl commits itself to give them the necessary teaching so that they can achieve the technical ability to insert in the world of the work.

Ecopell 2000 srl doesn't expose children and young workers to dangerous, risky or harmful situations for the health, both inside and outside of the working place. Here following, we bring the composition for groups of age of the personnel of the firm.

In the respect of the national and international normative in force, the firm has always sustained the importance of the work as a means of growth and personal development, and of acquisition of technical and professional ability.



Composition for groups of age





FORCED WORK

Ecopell 2000 srl, in compliance to the laws in force, doesn't apply, neither sustains, the use of the forced work and it doesn't require to the personnel to leave "deposits" or documents of identity at the beginning of the working relationship with the firm.

The personnel, during the engagement is formed regarding the contractual clauses, that they undersign, and the composition of the wage packet.

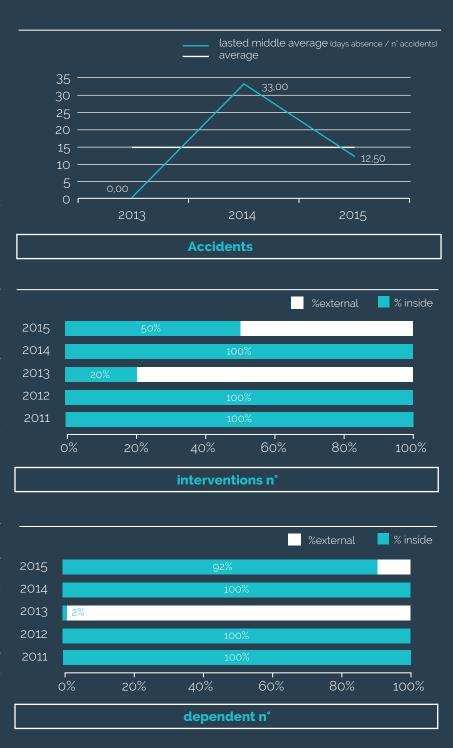
Ecopell 2000 srl maintains informed the personnel on the contractual requisites that discipline the working relationships with the firm.

of work effected by the personnel through a terminal that records the presences. Such recordings are managed by a computer system by the Person responsible of the personnel.



HEALTH AND SAFETY

Ecopell 2000 srl, keeping in mind the state of the prevailing knowledges concerning the industry and all the relative risks, guarantees a sure and healthy working place and adopts the suitable measures to prevent accidents and damages to the health that can verify during the carrying out of the work or in consequence of it, minimizing, as much as practicable and reasonably is, the causes of danger imputable to the working environment. The firm has named a Representative of the Direction that is responsible of the health and of the safety of the whole personnel and of the implementation of the safety and health factors as indicated in the norm. The whole personnel of the firm receives a regular and documented formation in safety subject and health, and such formation is repeated for the new and reassigned personnel. The firm has established systems to individualize, to avoid or to face potential risks to the health and to safety of the whole personnel (evaluation of the risks updated to 10/10/2014). Ecopell 2000 srl guarantees, for the use of the whole personnel, clean bathroomss, water drinkable access and hygienic structures for the maintenance of the foods. In the graph, it is recorded the middle duration of the accidents in the last 3 years. For what concerns the formation of the employees, during 2015, it has been effected four updatings. The graphs bring, for the obligatory formation, the division for interventions and for involved dependent.





ASSOCIATION AND TRANSACTION

Ecopell 2000 srl respects the right of the whole personnel to form and to join the labor unions of their choice and the right to the collective contracting in the way and times defined by the law.

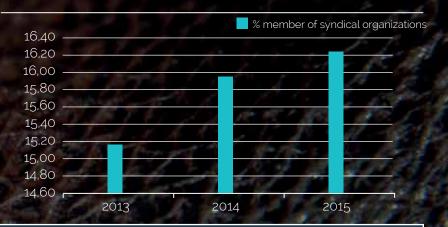
The Direction does not hinder in some way the wish of the workers to join demonstrations, strikes etc.

From the analysis of the graphic it is underlined that the percentage of workers registered to syndical organizations is slightly grown in the last years.

Inside Ecopell 2000 srl there are not present syndical representatives.

The firm, guarantees however, that the syndical representatives eventually named by the personnel won't be discriminated and that such representatives can communicate with the affiliate in the working place.

All the work-contracts applied by the firm recall the CCNL of the tanning sector. To the elements of pay of the CCNL, are added, besides, integrative elements as stipulated by accords regarding the tanning district ("District of the leather"). It deals with monthly fixed elements of pay (es. local superminimo) that may vary in relationship to the category of every single worker. Besides, it exists a fixed accord to provincial level, with which,



% of workers member of syndical organizations

has been founded a "prize of result", variable according to the results gotten by the firm during the year of reference (application of CIG, absenteeism, etc.).

It is important also to underline that during the last three years there have been no contentiouses with the employees and no strikes.



DISCRIMINATION

Ecopell 2000 srl, in compliance to the legislation in force, does not effect or support any discrimination in the assumption, in the wages, in the access to the formation, promotion, dismissal or retirement, referring to race base, class, national origin, religion, invalidity, sex, sexual orientation, syndical affiliation, political affiliation, age.

The personnel of Ecopell 2000 srl is hired through interviews effected by the Direction with the collaboration of the person responsible of Department.

The interview consists in the verification of the established requisites for the function in object and of the preceding working experiences.

Ecopell 2000 srl does not interfere with the exercise of the right of the personnel to follow principles or practices, or to satisfy connected needs to race, class, national origin, religion, invalidity, sex, sexual orientation, syndical affiliation or political affiliation.

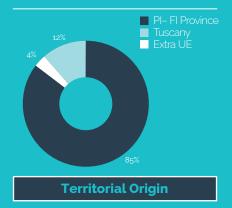
Ecopell 2000 srl does not allow behaviors, including gestures, language or physical contact, that are sexually coercive, threatening, offensive or turns to the exploitation.

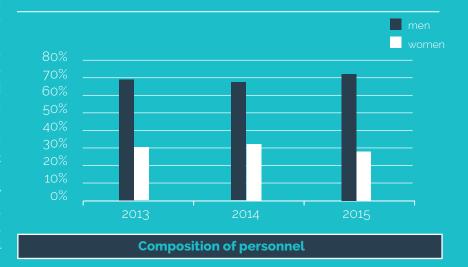
In the graph you have the composition, in percentage, of the male and female personnel of the firm: It can be noticed that women's percentage inside the firm is decreased in the last year. Indeed, at the end of year 2015, there have been some alternations.

For what concerns the distribu

tion of the workers for category, women are present in the finishing department as workers (6), in the administrative department in quality of employees (3) and for the cleaning service(1).

Currently in the firm there are present 4 extra CEE workers. The greatest part of the employees originate, instead, from the provinces of Pisa and Florence.







WORKING TIME

Ecopell 2000 srl respects the laws and the applicable industrial standards on the working time. The schedule of ordinary work is from Monday to Friday from 8.00a.m to 12.00a.m and from 14.00 to 18.00.

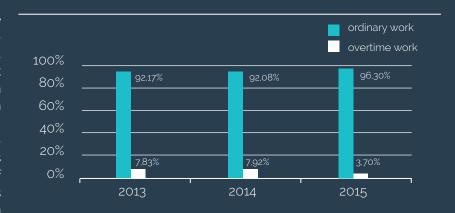
The duration of the working activity has fixed in 40 weekly hours and is determined by the norms of the national collective contracts of the sector. It results, besides, in force an inside circular, approved by the Direction, according to which working half an hour is not taken away to the late comers beginning from the 1° minute of delay (as the CCNL foresees) but on the contrary beginning from the 16° minute of delay.

The planning of the vacations, of the dismissals and of the permissions is arranged with the workers

The overtime work is effected only on the occasion of exceptional economic circumstances and of brief duration that cannot be faced with the new personal assumption and it never overcomes the limits defined by the national collective contract.

Following, the scheme of the total hours worked in the last three years with underlined the percentage of overtime work.

During the year 2015, the percentage of effected overtime work is decreased because there was a better organization of the production.



Working time





REMUNERATION

Ecopell 2000 srl corresponds a superior pay to the minima defined in the Collective Contract of sector to the workers, as anticipated in the integrative accords agreed with the syndical associations, is able to guarantee to the worker an additional income as well as the satisfaction of the fundamental necessities.

The wages point out the composition of what is received, of the deductions of law etc.

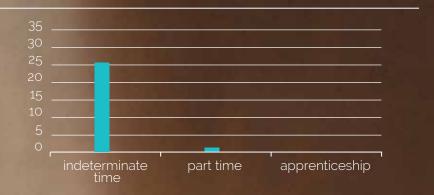
The work contracts duly signed by the parts and the copies of the pay documents are filed by the work Advisor office.

The formalities of payment of the wages (cheque, etc.) are freely chosen by the same workers to the action of the assumption.

The firm guarantees that possible deductions on the wages are not due to disciplinary purposes and that the composition of the pays and the retributive indemnities are clearly suitable and regularly to the benefit of the workers.

Ecopell 2000 srl guarantees that contractual accords are not stipulated for "only manpower" and for false apprenticeship so to avoid the fulfillment of the business obligations towards the personnel, as established by the legislation in force regarding work and social safety.

From the analysis of the graph herewith, it is underlined that "indeterminate work contract" is the most used by the firm.



Typology of work contracts



MANAGEMENT

The direction of the Ecopell 2000 srl has formalized a business politics concerning social responsibility to quarantee:

- a) the engagement to conform to the principles of the Code, to maintain the conformity to the applicable normative dispositions and to respect the undersigned accords;
- b) the engagement to the continuous improvement, particularly of its own organizational system;
- c) its accessibility in comprehensible form to the whole personnel, included administrators and management;
- d) its accessibility to the interested parts.

Such politics is periodically re-examined for verifying its suitability. Ecopell 2000 srl has named a representative of the direction that, independently from other possible responsibilities, can assure the respect of all the requisites of the present document.

Ecopell 2000 srl has established and maintains activ an appropriate procedure for the evaluation and the selection of the suppliers / subcontractors (and where opportune of the sub-suppliers) on the base of their ability to answer to the present document. Among the suppliers of the Ecopell 2000 srl there are not any domicile

workers.

Ecopell 2000 srl gives the maximum importance to the involvement, gradual in the time, of the Suppliers.

They have been identified as: "critical" the suppliers that operate in sectors that can implicate critical conditions of work for the employees or situations of minor or irregular work as the hide suppliers, the shipping companies, the suppliers of chemical products, the external workmanships.

PROFESSIONAL PRINCIPLES

Ecopell 2000 srl joins the principles of transparency, correctness and good faith in the relationships with institutions, clients, suppliers,

competors, avoiding disloyal actions in the market competition that brings damages and violate the principles of this code.

Ecopell 2000 srl guarantees the quality of the products and the safety of the consumer.

THE ENVIRONMENTAL BUDGET

The establishment of the Tannery Ecopell 2000 srl is situated in the industrial district of Santa Croce sull'Arno (Pi), turned to productive installations and services to the firms, of new realization still in progress of development.

This area is served by the Depurator System of Santa Croce sull'

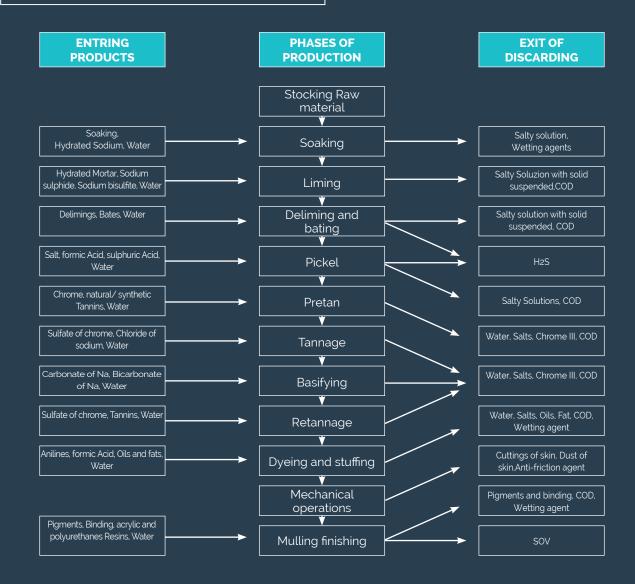
Arno. As it regards the road conditions, there is a suitable road net for the industrial transports, directly connected to the principal arteries of regional traffic (Highway A11 and S.G.C: Florence - Pisa-Livorno).

The district of the Tuscan leather includes the communes of

Castelfranco di Sotto, Montopoli Valdarno, Santa Croce sull'Arno, Santa Maria a Monte and San Miniato, in the Province of Pisa and the commune of Fucecchio, in the province of Florence.

The whole economy of the area holds up on the tanning workmanship and on related activities.

SCHEME OF THE PROCESS





THE GROUND

The area on which the building "Ecopell 2000 SRL" has placed, is in the portion of the commune of Santa Croce sull' Arno between the River Arno and the Antifosso of Usciana. The whole surrounding area is exclusively turned to industrial use.

As it regards the Hydrogeolog-

ical Risk, the area is classified "Level III - to middle / high risk", while as it regards the Water Risk is classified "Level II - low Risk", but, thanks to the infrastructures and the efficiency of the smaller hydrographic network, the area in object is characterized by a minimum Hydraulic Risk.

DISCHARGES IN ATMOSPHERE

The discharges in atmosphere carried by the chimney of the Tannery are referable to dusts (total particellar material MPT), volatile (SOV or COV) Organic Substances and (H2S) hydrogen, produced during the different phases of the production cycle (4 spraying

cabins), nitrogen oxide (NOx) and monoxide of carbon (CO) produced by the combustion of the methane in the thermal plant. The discharges in atmosphere of the aforesaid pollutants are subject to periodic analysis as indicated in the following graphic:

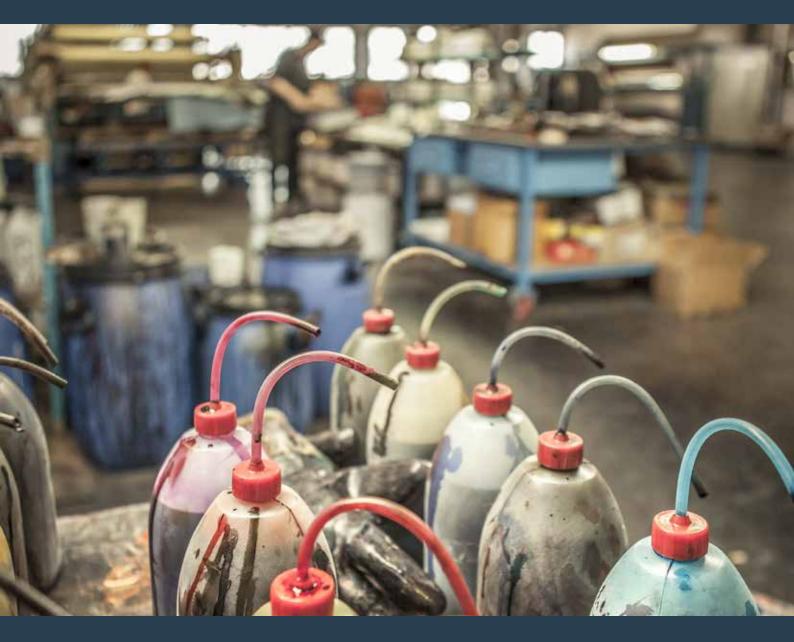
cov	H ₂ S	Dusts
Semestral	Semestral	Annual

Following, we report the average values of the COVs of the last 3 years. As it can be noticed, the

measured values are always under the limit values established by the law.







WATER DISCHARGES

The water used during the production by the Ecopell 2000 srl are picked by sewer-net that conducts to the Depuratore Consortile of Santa Croce sull' Arno, from which the purified refluis are conferred in an affluent (an artificial channel) of the River Arno, the Antifosso of Usciana. The Department ARPAT of Pisa effects

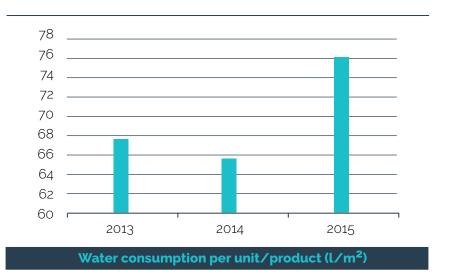
investigations contemplated to the evaluation of the quality of the waters of many water channels that cross the territory of the Province. The controls on the river Arno are performed with monthly frequency by the stations of Fucecchio, Calcinaia, S.Giovanni alla Vena, Pisa. The classification of the waters is made following the law D.Lgs 152/06. Tannery Ecopell 2000 srl, in its activity, also produces skins tanned with chrome, therefore it has been authorized to unload to the Aquarno depuration system according to Santa Croce sull'Arno commune 's regulations.

AVERAGE ANNUAL VALUES										
		ph	suspended solid mg/l	cod mg/l	chlorinates mg/l	sulfates mg/l	chrome mg/l	ammonia mg/l	cod. fil (sed. 2 hs ph 7) mg/l	unloading sampled mc.
YEAR	limit values	4 - 13	7000		8000	2500	100		8000	
2013		8,04	3082	5960	3146,82	844.73	31,27	193,64	3006,73	575,55
2014		8,12	2944,64	6180,36	3178,82	839,27	23,27	180,18	3079,36	554.36
2015		7.03	3932,36	9779,91	4487,09	1478,91	54,73	223,55	5741,64	388,45

USE AND CONSUMPTION OF WATER

The water requirement of the Ecopell 2000 srl is regularly satisfied through an authorized well. Quantity of water that the firm can daily withdraw is from the 16/05/12 of 200 m³.

During 2014. it has withdrawn 27097 m³s of water. In the graphic the average water consumption is recorded for unity of product.



USE AND CONSUPTION OF FUEL AND ENERGY

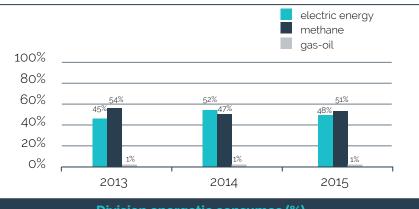
The Ecopell 2000 S.r.l obtains external supplies of electric energy. The firm uses the methane to heat the water.

Inside the court yard, it is present a small cistern for combustible

(gas-oil) for the restocking of the means for moving the commodities inside the industrial area.

The energetic consumptions of the last 3 years are reported here below:

Energetic consumptions for unity of product (TEP/1000m2)				
	2013	2014	2015	
electric energy	0,615	0,581	0,804	
gas-oil	0,014	0,532	0,855	
methan	0,732	0,013	0,012	
tot.	1,361	1,125	1,670	



Division energetic consumes (%)



WASTE MATERIALS

The waste materials produced during the production process of Ecopell 2000 srl are reported in the following graphic.

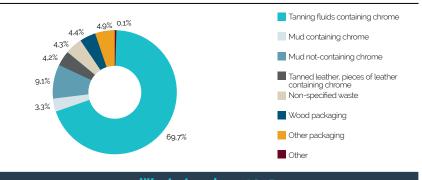
In the cake-graph it is illustrated the division of the different type of waste during 2015 It can be noticed that the 69.7% of the produced waste materials is constituted by tanning fluids containing chrome. For what concerns the destination of the waste, the 83% is sent to the recovery.

The waste material obtained from taking flesh off the skins (scarnatura) is managed as a refuse from the external workmanship that treats this activity.

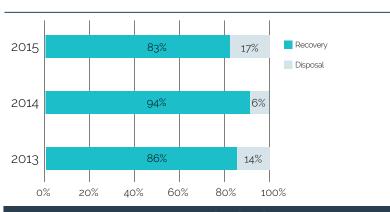
The production is of around 10kg each skin and everything is destined to recovery.

The waste, that derives from the mechanical removal of the subcutaneous layer of the skins in tripe, the hair and other solid residues from the first phases of production are not classified by the current normative as refuse, but as By-product of Animal Origin (SOA). The management of the waste material obtained by taking flesh off the skins, is disciplined by a normative that comes down from an European (1774/2002/CE) rule, replaced by the Rules n. 1069/2009 and n. 142/2011.

For what concerns the paper and plastics, the diversified harvest is effected in special sacks that are withdrawn by personnel of the Commune in specific days.



Waste typology 2015



Waste destination

CHEMICAL PRODUCTS

Outside of the building there are situated the siloses of the chemical products, connected to the system of automatic dosing of the drums. The siloses are all situated within a specific area turned to stock liquid products, this area is endowed with an inclinated drainage directed towards a grate which is connected to a special cistern of harvest.

The current chemical products are exclusively used in the various phases of the production. For every used product, the firm owns the relative safety card. The firm is structured so that to

minimize the manipulation of chemical products; in the whole drum-section there is a semi-authomatic system of dosing the liquid chemical products, driven by a PLC of control. During normal conditions of work, or rather when the system of production of the skins works totally in automatically, the products are dosed automatically way by the system of control.

In the finishing section, it was not possible to arrange automatic systems of dosing the spraying machine, because the products are not available in commerce,

but they are opportunely composed by mixtures of different products which are prepared by specialized people of the tannery. In every case, the manipulation of the chemical products happens in the respect of what is written on the label and what is established in the Plan of chemical Risk.

In 2015, there have been used 511.568 kg of chimical products which corresponds to an unitary consumption of 1,97 kg / sqmt per finished skin.



♀ Ecopell 2000 Srl

Via del Trebbio Nord, 41 56029 Santa Croce sull'Arno (Pisa) ***39 0571 366168**

info@ecopell.it

www.ecopell.it