

1 Introduction and Scope of Application

Our company recognizes the central importance of human rights, human dignity, and social sustainability in the conduct of its activities. In accordance with applicable international and local regulations, we are committed to:

- ensuring fair and safe working conditions,
- promoting the personal and professional growth of our employees,
- acting with integrity, respect, and responsibility towards workers, suppliers, customers, and local communities,
- adopting effective management systems for monitoring, prevention, and continuous improvement.

This commitment extends to all workers, including temporary, migrant, student, contract, directly employed, and any other category of worker.

2 Scope of Application

This policy applies to:

- all company employees, regardless of their contractual status (fixed-term, permanent, temporary agency workers, apprentices, interns, migrant workers, students).
- suppliers, subcontractors, temporary employment agencies, and business partners, who are required to adhere to the principles described herein.

3 Fundamental principles

3.1 Zero Tolerance for Modern Slavery:

We adopt a zero-tolerance policy toward all forms of modern slavery within our operations

3.2 Legal Conformity:

We are committed to complying with all relevant national and European regulations, including the fundamental Conventions of the International Labour Organization (ILO), particularly those concerning:

Fundamental Principles and Rights at Work

- Freedom of association and collective bargaining (C87 and C98)
- Elimination of forced labor (C29 and C105)
- Elimination of child labor (C138 and C182)
- Equal remuneration and non-discrimination in employment (C100 and C111)

Working Conditions

- Forced labor (C29 and C105)
- Working hours, leave, and rest periods (C47, C132 and C171)
- Wages (C95 and C131)
- Occupational health and safety (C155, P155 and C187)
- Social security (C102)

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- Maternity/paternity protection (C183)
- Violence and harassment (C190)
- Private employment agencies (C181)

These references constitute the ethical and regulatory foundation of our social responsibility policy.

4 Legal and Contractual Protection; Stable Employment

The company ensures that all workers receive written, clear, and understandable contracts, signed before the start of employment. Contracts must include all employment conditions, including working hours, wages, duties, benefits, and termination conditions. Any detrimental modification to the contract after hiring is prohibited. Employment agencies must be monitored to ensure the protection of workers' rights.

The company promotes stable and sustainable employment and avoids excessive use of short or precarious contracts. Contracts shorter than one month are permitted only in exceptional and documented cases. We encourage work continuity and the reduction of turnover.

The company guarantees the right to due process prior to any dismissal. Workers must have access to impartial complaint and appeal mechanisms, such as arbitration or labor courts. Dismissals for discriminatory or retaliatory reasons are strictly prohibited

5 Prohibition of forced labor

Forced labor is strictly prohibited in all its forms.

Our company does not tolerate under any circumstances, including but not limited to:

- Work performed in conditions of servitude, including debt bondage
- Involuntary or exploited prison labor
- Coerced contract labor
- Slavery or human trafficking

This prohibition also applies to the transport, harboring, recruitment, transfer, or receipt of persons through threat, force, coercion, abduction, or fraud for the purpose of labor or services.

Voluntary Work: All work must be performed on a voluntary basis.

Freedom to Resign: Workers are free to leave their job at any time. The company respects the worker's right to terminate employment with the notice period required by the applicable Collective Bargaining Agreement. Penalties or sanctions for ending the employment relationship are prohibited.

Freedom of Movement: We do not retain workers' passports or identity documents. We do not impose restrictions on workers' freedom of movement within the facility or when entering/exiting employer-provided accommodation.

"Zero-Cost" Recruitment Policy and Prevention of Debt Bondage

Ban on recruitment fees: Workers are not required to pay any recruitment, hiring, or related fees.

The company does not allow workers to be bound by debts owed to the employer, employment agencies, or intermediaries.

Mandatory deposits, withheld savings, imposed loans, or any mechanisms that may create economic dependency or undue constraints are not permitted.

6 Young Workers

Our company recognizes the fundamental right of children and adolescents to receive an education, grow in a healthy environment, and not be exposed to work conditions that may harm their physical, mental, or social development.

For this reason, we adopt a zero-tolerance policy toward all forms of child labor, in compliance with national laws and ILO Conventions. At the same time, we ensure the proper management of young workers, promoting safe apprenticeships and internship programs.

Specific Commitments

We do not employ or use workers below the legal minimum age in the country of operation, and never under the age of 18. This applies equally to apprentices, interns, and student workers.

In case of accidental discovery of child labor, the company implements a remediation plan that includes:

- support for the minor and their family,
- assistance to re-enroll the minor in school until completion of compulsory education,
- maintaining family income until the minor reaches the legal working age,
- potential future placement in legitimate and safe apprenticeship programs.

Apprentices, interns, and student workers are hired only within real and verifiable educational programs developed in collaboration with schools, training bodies, and competent institutions.

The duration of internships or apprenticeships is defined and limited; upon completion, the possibility of stable employment is assessed.

Students and apprentices receive fair remuneration proportional to the work performed, never below the legal minimum wage, and are granted equal treatment as entry-level workers performing similar tasks.

Young workers' schedules must always be compatible with schooling and must not compromise regular class attendance.

7 Working Hours

The company recognizes that compliance with working-hour rules is fundamental for workers' health, safety, and well-being.

Ordinary working hours follow the applicable national regulations and National Collective Labour Agreement (CCNL).

Breaks are guaranteed according to national law and company regulations.

Overtime is limited to cases permitted by law and the CCNL (National Collective Labour Agreement) and must never exceed legal limits.

Workers are guaranteed at least one rest day per week, with shift planning designed to protect personal and family life.

Overtime must be voluntary and compensated with the legal and contractual premiums. No employee may face negative consequences for refusing overtime.

The company guarantees the right to take annual leave, paid time off, parental leave, and sick leave as established by national law and the CCNL (National Collective Labour Agreement).

The company ensures a balanced workload, preventing overload and stress. Workers must have adequate tools and resources to carry out their tasks safely and efficiently.

We promote predictable and, when possible, flexible working hours to support work-life balance. Special attention is given to night-shift workers through dedicated protection and support measures.

8 Wages and Benefit

Our company recognizes that fair, timely, and transparent remuneration is essential for worker well-being and for building mutual trust. Ensuring fair wages means respecting the law, the applicable CCNL (National Collective Labour Agreement), and the principles of fairness, equal treatment, and professional dignity.

All workers receive wages compliant with national law and the applicable CCNL (National Collective Labour Agreement). Under no circumstances may total compensation fall below legal or contractual minimums.

Wages are proportional to hours worked and the assigned role, with equal treatment for workers of equal qualification.

Overtime is compensated with the premium rates established by second-level agreements that offer conditions more favorable than the CCNL (National Collective Labour Agreement).

All workers receive clear and understandable payslips with details of regular hours, overtime, allowances, deductions, and contributions.

Wages are paid punctually and documented according to the company calendar, without unjustified delays.

Deductions are permitted only when allowed by law or the applicable CCNL (National Collective Labour Agreement).

The company ensures regular payment of social security and tax contributions within legal deadlines.

The HR Manager personally reviews all wage-related reports and guarantees impartial, timely, and retaliation-free handling.

All workers have access to legally mandated benefits, including sick leave, maternity/paternity leave, pensions, and insurance. The company is committed to guaranteeing a welfare system supporting employees' physical, mental, and social well-being.

The company promotes work-life balance, offering flexible schedules and support for parenthood and paid maternity/paternity leave.

9 Training and Professional Development

We recognize the value of professional development and invest in training programs, skill enhancement, and career pathways that enable employees to achieve their potential and access promotion opportunities. We believe that an inclusive workplace focused on personal development is essential for individual and collective success.

10 Non-Discrimination, Non-Harassment, and Humane Treatment

Our company considers respect for dignity, equality, and personal integrity as fundamental values. We believe that an inclusive work environment—free from discrimination and abuse—is essential for motivation, growth, and well-being. Diversity is recognized as a value and a driver of innovation and development.

We ensure that no worker is discriminated against based on gender, age, race, color, ethnicity, religion, sexual orientation, gender identity, disability, marital status, pregnancy, political or union affiliation, social origin, or any other personal condition.

Sexual, psychological, verbal, or physical harassment, as well as intimidating, coercive, or degrading behavior, is strictly prohibited.

Corporal punishment, threats, or any form of abuse are not tolerated.

Decisions related to hiring, compensation, training, promotion, or dismissal must be based on merit, not personal characteristics such as race, color, age, sex, religion, sexual orientation, gender identity, marital status, or political affiliation.

Reasonable accommodation is provided for disabilities, religious needs, or personal circumstances affecting work.

Management promotes regular training and awareness initiatives to prevent discrimination and ensure an inclusive and respectful environment. Disciplinary policies must be clearly defined, communicated, and non-discriminatory.

11 Freedom of Association and Collective Bargaining di Associazione e contrattazione collettiva

Our company recognizes that freedom of association and the right to collective bargaining are fundamental principles protected by national and international standards. We believe that constructive and transparent dialogue between management and workers is essential for a fair, collaborative, and continuously improving workplace.

All workers have the right to freely join or not join unions or other legitimate forms of worker representation without discrimination or retaliation.

The company respects and supports the legitimate activities of elected or recognized worker representatives, promoting open and transparent dialogue.

The right to collective bargaining is guaranteed, whether through recognized unions or equivalent forms of worker representation.

Management is committed to maintaining regular and constructive dialogue with worker representatives to prevent conflicts and jointly manage social and organizational issues.

No worker or representative may face penalties, demotions, or obstacles for performing representative duties.

Management promotes active worker participation in improvement initiatives, including outside traditional union structures, fostering engagement and shared responsibility.

12 Environment, Health, Safety, and Community

The company considers the health and safety of employees, collaborators, and partners a top priority. We are committed to creating and maintaining a safe, healthy work environment in full compliance with applicable regulations.

We promote a corporate culture that encourages accident prevention, risk reduction, and the physical and mental well-being of all individuals working for or with the company. We regularly implement training programs, risk assessments, and monitoring activities to ensure that health and safety standards are met in all company operations. We also encourage employee involvement through a reward system for improvement ideas.

Our company is aware of the impact that production activities can have on the environment and surrounding communities. Therefore, we operate responsibly and sustainably, minimizing negative environmental impacts, promoting efficient resource use, and contributing to social and economic development in the areas where we operate.

We believe that environmental protection and community engagement are integral to our social responsibility and long-term competitiveness. We promote local community engagement through social, cultural, educational, and environmental initiatives, fostering inclusion and dialogue with stakeholders.

13 Complaint and reporting mechanism

The company provides safe and confidential reporting channels, including whistleblowing tools (see [Whistleblowing Policy](#)), through which any worker can report violations of this policy.

Each report is managed:

- Promptly: The validity of any complaint must be investigated without delay.
- Impartially: Investigations and corrective actions must be impartial, non-discriminatory, and consistent with prior cases when applicable.
- With feedback to the reporter (when known): The outcome of the investigation and any subsequent measures must be communicated to the individuals involved, ensuring privacy.
- Without retaliation: No retaliation will occur against anyone who submits a report in good faith.

14 Policy dissemination

Managers must implement and disseminate the commitments and directives listed above and develop activities aimed at achieving corporate objectives.

We also make this document publicly available and actively promote its dissemination through various communication methods, ensuring access to anyone who requests it.

REVISION HISTORY

REVISION	DATE	DESCRIPTION
0	04/11/2025	New release