

REVISION LIST

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1. Introduction

Our company is committed to ensuring respect for human rights and compliance with national and international labor laws, guaranteeing fair, safe, and dignified working conditions for every employee. This corporate social policy is based on the Universal Declaration of Human Rights, the fundamental conventions of the International Labor Organization (ILO), Italian labor regulations, and the National Collective Labor Agreement for Metalworkers (CCNL Metalmeccanico).

2. Child Labor

The company has a zero-tolerance policy towards child labor, aiming to protect the rights of children and young workers by promoting working conditions that comply with international and national child labor laws. In line with our commitment to ethics and social responsibility, we fully comply with international regulations such as ILO Convention No. 138 on the minimum age for employment and Italian laws, including Legislative Decree No. 262/2000, which regulates child labor and training internships.

- 1. Minimum Age for Employment:** The company establishes a minimum working age of 16 years. This requirement complies with Italian law, which allows young people to start working only after completing compulsory education. The minimum age is also aligned with the principles of ILO Convention No. 138, which aims to protect children from work that may interfere with their education and physical, mental, and social development.
- 2. Internships and Training Programs:** In accordance with Italian legislation, young people over the age of 16 may only be admitted to internships and training programs if they comply with current regulations. These internships and training programs are designed for practical learning and are not considered traditional employment. The company ensures that all internship and training opportunities are structured in a way that does not compromise the right to education and the well-being of young participants.
- 3. Age Verification and Hiring Process:** The company implements strict procedures to verify the age of candidates before hiring. Each new employee must provide official documentation proving their age, such as an identity document or birth certificate. In the case of minors



- involved in internships or training programs, legal guardians' consent is also required, in compliance with the regulations governing minors' access to the workforce.
- 4. Collaboration with Authorities and Monitoring:** The company actively collaborates with local and national authorities to prevent child labor. This includes participating in awareness initiatives, cooperating with public and private organizations to monitor hiring practices, and ensuring compliance with child labor laws. Additionally, the company has an internal audit system that guarantees adherence to these policies and conducts periodic checks to ensure the absence of child labor in its operations.
 - 5. Social Responsibility and Education:** The company recognizes that protecting children's rights goes beyond legal compliance and includes an active commitment to promoting education and development. Therefore, we engage in education and training projects that provide learning opportunities for young people, helping prevent child labor in the communities where we operate. Our policy ensures that no minority is ever exploited for work that could interfere with their educational and social growth.

3. Forced Labor and Human Trafficking

The company firmly opposes all forms of forced labor, involuntary servitude, and human trafficking. We adopt strict policies in line with ILO Conventions No. 29 and No. 105, which condemn and prohibit such practices. Our company is committed to ensuring that all employment relationships are based on principles of freedom, fairness, and respect for fundamental human rights.

- 1. Free and Informed Consent:** All workers must be employed voluntarily, with full consent, free from any form of coercion or compulsion. Entering the workforce must be a conscious and voluntary process in which the worker is fully informed about working conditions, employment contracts, and related obligations. Every worker must be free to terminate their employment in compliance with national laws and company regulations, without facing pressure or intimidation.
- 2. Prohibition of Document Retention and Recruitment Fees:** The company strictly prohibits requiring employees to deposit personal documents such as passports, identity cards, or any other documentation as a condition of obtaining or maintaining employment. Additionally, workers must not be required to pay any fees or charges to secure or continue employment. Under no circumstances should workers pay money to access job opportunities within the company. Any practice that could be considered extortion or economic exploitation is strictly prohibited.
- 3. Ban on Physical or Psychological Coercion:** The company enforces a zero-tolerance policy regarding the use of physical, psychological, or emotional coercion against workers. The company prohibits any practice that forces an employee to perform involuntary tasks, including threats of violence, intimidation, degrading treatment, harassment, or psychological abuse. Employees' freedom of choice must always be respected, and any action that could compromise their well-being, dignity, and autonomy is unequivocally condemned.
- 4. Prevention of Human Trafficking:** The company is committed to collaborating with local and international authorities to prevent and combat human trafficking. We recognize that



human trafficking is a severe violation of human rights and an unacceptable form of exploitation. Therefore, we implement strict selection and monitoring procedures to ensure that workers are not victims of illegal trafficking. Any suspicion of human trafficking is immediately reported to the relevant authorities, ensuring that appropriate legal measures are taken.

5. **Training and Awareness:** The company promotes awareness and internal training programs to educate employees and managers on preventing forced labor, human trafficking, and exploitation. These programs aim to increase awareness of how to identify signs of forced labor or trafficking and how to intervene appropriately in suspected cases. Employees are encouraged to report any suspicious practices without fear of retaliation, with confidentiality and protection against discrimination or punishment guaranteed.
6. **Monitoring and Compliance:** The company has established a continuous monitoring system to ensure that all hiring processes and working conditions comply with national and international laws against forced labor and human trafficking. Internal audits and regular inspections are conducted to ensure compliance with corporate policies and prevent violations of labor regulations. Any non-compliance is addressed with immediate corrective actions, and suspected violations are treated with the utmost seriousness.

4. Freedom of Association and the Right to Collective Bargaining

The company fully recognizes and respects the right of all workers to freely join trade unions and participate in collective negotiations, as established in Article 39 of the Italian Constitution, ILO Conventions No. 87 and No. 98, and the National Collective Labor Agreement (CCNL) for the Metalworking sector. Our company is committed to fostering a work environment that encourages social dialogue and respects trade union rights, contributing to the improvement of working conditions and the professional growth of employees.

1. Right to Freedom of Association

Every worker has the right to join trade unions of their choice without interference or intimidation in order to protect their professional and economic interests. The company respects freedom of association and ensures that workers are not subjected to pressure, discrimination, or punishment as a result of their union membership. Any attempt to limit or obstruct this right is strictly prohibited and will be treated with the utmost seriousness.

2. Right to Collective Bargaining

We recognize and support the right of workers to collectively negotiate through trade unions to define working conditions, wages, and other matters related to workplace well-being. The company is committed to ensuring that collective bargaining takes place in a respectful, transparent, and collaborative environment, recognizing the value of agreements that reflect the needs of both workers and the company. Negotiations will be conducted in good faith, with the goal of reaching solutions that enhance the quality of work life and contribute to mutual success.



3. Protection Against Discrimination and Retaliation

The company condemns any form of discrimination or retaliation against those who exercise their right to freedom of association and collective bargaining. No worker will be penalized, intimidated, or treated unfavorably for joining a union or participating in union negotiations. We are committed to adopting measures to prevent any behavior that may be perceived as discriminatory and to promptly addressing any reports. Any act of retaliation or discrimination will be handled with the utmost severity, in accordance with applicable laws.

4. Dialogue and Collaboration with Trade Unions

The company is committed to maintaining constant and positive communication with trade unions. We aim to foster a climate of cooperation and open dialogue, with the goal of resolving any conflicts peacefully and constructively. The company is willing to collaborate with union representatives to improve working conditions by promoting initiatives that ensure workers' well-being and company efficiency. Furthermore, we encourage the active participation of unions in decision-making processes related to company policies that impact personnel.

5. Training and Awareness of Trade Union Rights

The company promotes awareness of trade union rights among all workers by providing clear and accessible information regarding their rights to association, collective bargaining, and the benefits of union participation. We are committed to ensuring that every employee fully understands their rights and is not hindered in exercising their freedom of association. To this end, informational sessions are organized, and resources are provided to support workers in understanding the benefits of union participation and the mechanisms of collective bargaining.

6. Compliance with National and International Laws and Regulations

The company complies with national and international laws that protect workers' rights, including those related to freedom of association and collective bargaining. In particular, we adhere to ILO Conventions No. 87 and No. 98, which guarantee trade union freedom and the right to collective bargaining. Any modifications to working conditions, company policies, or contractual practices will respect trade union rights and comply with applicable collective agreements.

5. Non-Discrimination and Equal Opportunities

The company is committed to ensuring an inclusive, respectful, and discrimination-free work environment where every employee is treated with dignity and respect, regardless of gender, age, ethnic origin, religion, sexual orientation, disability, or political opinions. Our policy fully complies with Italian legislation, particularly Legislative Decree No. 198/2006 (Code of Equal Opportunities between Men and Women), and ILO Convention No. 111, which promote the principle of equal treatment and protection against workplace discrimination.

1. Commitment to an Inclusive Work Environment

The company actively promotes a corporate culture that values diversity and inclusion. Every worker, regardless of their ethnic, religious, or cultural background, is treated with fairness,



respect, and impartiality. The goal is to create a work environment where all employees can express their potential without fear of discrimination or exclusion due to personal identity or belonging to minority groups. The company firmly condemns any form of prejudice and discrimination.

2. Hiring, Promotion, and Compensation Decisions

Decisions regarding hiring, promotion, and compensation are based solely on objective and meritocratic criteria, including competence, job performance, professional qualifications, and experience. The company does not discriminate against candidates or employees based on personal characteristics unrelated to work, such as gender, age, sexual orientation, race, religion, disability, or political opinions. Our commitment is to provide every employee with equal opportunities for professional growth and development, ensuring that everyone has the chance to advance based on merit.

3. Promotion of Gender Equality

The company adopts active policies to promote gender equality, striving to eliminate disparities in treatment between men and women within the organization. This includes measures to ensure equal opportunities in hiring, pay, training, and career progression. Awareness and training programs are in place to counteract gender stereotypes and prevent harassment or discrimination related to sex or gender identity. The company also supports work-life balance with flexible policies that assist employees at all stages of their lives.

4. Inclusion of Protected Categories

The company is committed to implementing policies that support the inclusion of individuals from protected categories, such as people with disabilities or those belonging to vulnerable groups. The hiring and integration of workers with disabilities are a priority, with specific measures in place to adapt work environments and improve accessibility. Corporate policies include promoting career opportunities for employees with disabilities, ensuring they have the same opportunities for growth and development as other workers.

5. Training and Awareness Policies

To ensure respect for and implementation of the non-discrimination policy, the company offers regular training courses for all employees and managers. These aim to raise awareness and educate about diversity, inclusion, respect for cultural differences, and the fight against discrimination. The training covers topics such as preventing discrimination, best practices for fostering an inclusive environment, and respect for fundamental human rights. Additionally, managers receive training on managing diversity within teams and promoting inclusive and respectful policies.

6. Monitoring and Implementation of Policies

The company implements monitoring and evaluation systems to ensure the effectiveness of its non-discrimination and equal opportunity policies. Every report of discrimination is taken very seriously and analyzed to take appropriate corrective action. Employees are encouraged to report any discriminatory or exclusionary practices through confidential channels, ensuring that all reports are reviewed fairly and promptly without fear of retaliation.

7. Support for Cultural Diversity

The company recognizes the importance of cultural diversity and promotes policies that embrace and respect employees' different ethnic and religious backgrounds. Corporate practices are designed to be inclusive of various cultural traditions, with particular attention



to specific needs. When necessary, the company provides accommodation for religious holidays, flexible working hours, and other initiatives to ensure that every employee feels respected and valued in the workplace.

6. Discipline and Treatment of Workers

The company is committed to maintaining a fair, respectful work environment that upholds the rights of every worker. Disciplinary measures are applied carefully, in full compliance with the principles of proportionality, fairness, and transparency, and always in accordance with applicable regulations, including national collective labor agreements (CCNL) and relevant legislative provisions. Our company believes that employees should be treated with dignity and human rights should be respected, and that any disciplinary action must be managed fairly, consistently, and justifiably.

1. Principle of Proportionality and Respect for Workers' Rights

Any disciplinary measure taken must be proportional to the severity of the violation committed by the worker. The company ensures that sanctions are neither arbitrary nor excessive but always proportionate to the offense. Before applying any disciplinary measure, a thorough evaluation of the worker's conduct is carried out, taking into account the circumstances, intentions, and severity of the behavior. In all cases, the worker has the right to be heard and to defend themselves before any sanctions are imposed. Every disciplinary action must be clearly documented and justified transparently.

2. Compliance with Metalworking CCNL and Current Regulations

The disciplinary procedures adopted by the company comply with the provisions of the National Collective Labor Agreement (CCNL) for the metalworking sector and current Italian labor law regulations. Any violation of the company's code of conduct or internal policies is handled in accordance with the applicable collective agreement. This ensures that disciplinary actions are consistent with legal and contractual provisions, always protecting workers' rights.

3. Infraction Management Procedure

If a violation of company policies or labor regulations occurs, the company will initiate a disciplinary procedure, which includes the following steps:

- **Preliminary Investigation:** In case of suspected misconduct, the company will conduct an investigation to verify the facts. The worker will have the opportunity to present their version of events and provide any evidence in their defense.
- **Notification of Violation:** If the investigation confirms the violation, the worker will be informed of the allegations against them in a clear and transparent manner.



- **Disciplinary Sanction:** If necessary, a sanction proportionate to the offense will be applied. Sanctions may range from a simple warning to more severe measures, such as suspension or dismissal, depending on the gravity of the violation.
- **Appeal:** The worker will always have the right to appeal, as provided by the collective agreement, to challenge the disciplinary sanction and request a review of the decision.

4. Prohibition of Unjustified Punishment and Degrading Treatment

The company strictly prohibits any form of corporal punishment, verbal abuse, harassment, or degrading treatment of employees. Any form of physical or psychological abuse, including insults, threats, humiliation, intimidation, or discriminatory behavior, is absolutely unacceptable. The company is committed to ensuring that workers are never subjected to unjust pressures or treatments that may compromise their dignity. Any such behavior will be addressed with the utmost severity, and necessary corrective actions will be taken.

5. Respect for Privacy and Confidentiality

All disciplinary actions will be handled confidentially, respecting the worker's privacy. Information regarding any disciplinary proceedings, including details of infractions and decisions taken, will only be shared with authorized personnel, such as human resources and, when necessary, union representatives. The company implements data protection measures to ensure that all sensitive information is handled in compliance with privacy and data protection laws (EU Regulation 2016/679 – GDPR).

6. Training for Managers and Awareness Programs

All managers and human resources personnel receive continuous training on handling disciplinary matters to ensure that the measures applied are fair and non-discriminatory. Training also includes awareness programs on respecting workers' rights, preventing abuse or mistreatment, and managing conflicts or infractions constructively. Additionally, employees are informed about their rights regarding disciplinary matters and the procedures for reporting any violations by colleagues or superiors.

7. Complaint Mechanisms

The company encourages employees to report any abuse, mistreatment, or violation of their rights safely and confidentially. Secure and anonymous complaint channels are available to protect workers' well-being and dignity, allowing them to report issues without fear of retaliation. Every report will be taken seriously and investigated promptly and professionally.

7. Working Hours and Compensation

The company is committed to ensuring working conditions that respect employees' rights, particularly regarding working hours and remuneration. The company fully adheres to the provisions of the National Collective Labor Agreement (CCNL) for the Metalworking Industry and Legislative Decree 66/2003, which regulate working time organization, rest rights, and payment methods.

1. Working Hours

The company ensures that the weekly working hours comply with legal and collective agreement provisions:



- **Maximum Weekly Working Hours:** Weekly working hours must not exceed 40 hours, in accordance with the CCNL Metalworking Agreement and Italian regulations. This means that no employee shall work beyond 40 hours per week, except for specific business needs, always in compliance with current legislation.
- **Overtime:** Overtime, meaning hours worked beyond the weekly limit, is allowed only when required by the company for extraordinary needs. However, overtime must be agreed upon in advance with the employee and will be compensated based on union agreements and applicable regulations. Overtime pay will be calculated with an additional percentage over the normal hourly wage, as established by the CCNL Metalworking Agreement.
- **Flexible Working Hours:** The company, in line with organizational needs, may implement flexible work arrangements, such as distributing working hours on a weekly or monthly basis. Any deviation from standard hours must be agreed upon with employees or union representatives, where applicable.

2. Daily and Weekly Rest Periods

The company guarantees that every worker has the right to adequate daily and weekly rest periods:

- **Daily Rest:** Every worker is entitled to a daily rest period of at least 11 consecutive hours between shifts, as established by European and national regulations. This rest period is designed to protect workers' health and well-being, ensuring necessary recovery.
- **Weekly Rest:** Each employee is entitled to one weekly rest day, typically on Sunday, unless organizational or sectoral requirements necessitate a different schedule. If an employee works on their weekly rest day, they will be entitled to additional compensation or compensatory rest, as per the applicable regulations.

3. Compensation

The company is committed to ensuring fair remuneration in accordance with the CCNL Metalworking Agreement and Italian labor laws:

- **Minimum Wage:** Every worker's salary will be at least equal to the contractual minimums set by the CCNL Metalworking Agreement, which defines economic treatment based on professional level, seniority, and specific duties. The company is committed to respecting these minimums, ensuring that salaries reflect workers' skills and responsibilities.
- **Payment Methods:** Salaries will be paid regularly on a monthly basis, preferably by the end of each month. Payment will be made via bank transfer or another agreed-upon method. Every pay slip will be clear and transparent, detailing all salary components, including overtime, bonuses, allowances, and tax and social security contributions.
- **Overtime Compensation:** If an employee works overtime, they will receive increased pay compared to their base hourly wage, following the CCNL Metalworking Agreement provisions. The percentage increase varies depending on the time when the overtime occurs (e.g., additional pay for holiday or night work).



- **Bonuses and Incentives:** The company may introduce incentives or bonuses to motivate and reward outstanding work performance. These bonuses are subject to negotiation between the parties and aligned with union agreements. Any bonus or incentive will be documented and paid with the same regularity as regular wages.

4. Part-Time Work and Special Conditions

The company acknowledges and manages part-time employment contracts in compliance with Italian regulations. In such cases, weekly working hours will be reduced compared to full-time employment and proportionally adjusted in salary while maintaining workers' rights, including those related to rest and leave. If an employee has a part-time contract, their salary will be proportional to the number of hours worked compared to a full-time contract.

5. Periodic Review of Working Hours and Compensation

The company commits to periodically reviewing working conditions, including working hours and wages, to ensure continued compliance with legal and contractual regulations. Any changes will be promptly communicated to employees and discussed with union representatives where applicable. Reviews may include adjustments to the cost of living, the introduction of new contracts, or alignment with industry standards.

6. Special Conditions for Employees with Disabilities or Illness

For employees with disabilities or specific health conditions, the company is committed to respecting regulations related to the rights of disabled workers and sick leave policies. Employees will be entitled to the same economic treatment as other workers, without discrimination. When necessary, the company will implement flexible working hours and support employees with particular health conditions, always in compliance with Italian laws and corporate policies.

8. Implementation and Monitoring

The company is committed to spreading this policy to all employees and suppliers and ensuring compliance with these principles through:

- Periodic training on workers' rights and company policies.
- Internal audits to monitor adherence to this policy.
- Anonymous reporting channels for any violations.

9. Conclusions

This corporate social policy reflects the company's commitment to ensuring a work environment that respects and promotes principles of fairness, safety, and human rights. The company recognizes the fundamental importance of operating in compliance with current regulations, protecting the dignity, well-being, and rights of its employees, collaborators, and suppliers. It is committed to ensuring that every aspect of its operations, from worker selection to human resource management, aligns with ethical values and international labor rights, environmental, and social responsibility standards.



1. Promoting a Fair and Inclusive Work Environment

The company strives to create and maintain an inclusive work environment that fosters diversity and respects the rights of all workers, regardless of their gender, ethnicity, religion, sexual orientation, disability, political views, or any other personal characteristic. The commitment is to eliminate any form of discrimination, harassment, or abuse, creating a workplace based on mutual respect, equality, and collaboration among all employees. Every individual will be treated with dignity, and company decisions regarding hiring, promotions, training, and compensation will always be based on merit and competence.

2. Ensuring Workers' Safety and Health

The company is committed to providing a safe working environment that protects employees' physical and mental health. This includes implementing workplace safety policies and measures, complying with health and safety regulations (Legislative Decree 81/2008), and adopting practices to prevent workplace injuries and occupational diseases. The company promotes training and awareness activities on workplace safety and encourages the use of personal protective equipment (PPE) where necessary. Additionally, the company implements emergency and safety plans, providing employees with the necessary resources to ensure a risk-free work environment.

3. Respect for Human Rights and Compliance with Regulations

The company is committed to complying with all national and international laws and regulations concerning human rights and labor rights. In particular, it adheres to the provisions of the International Labor Organization (ILO) conventions, Italian labor legislation (including the Civil Code and Labor Code), and European directives on labor, health, and safety. The company recognizes the importance of fostering a culture that respects fundamental rights, preventing all forms of child labor, forced labor, exploitation, and human trafficking. Every employee has the right to work in an environment that respects their freedom and dignity, without fear of discrimination or abuse.

4. Engagement of All Employees and Collaborators

Every employee and collaborator of the company is required to respect and actively contribute to the implementation of this social policy. This commitment applies to all organizational levels, from company leadership to individual workers, and is expected at all times and in all work contexts. The company promotes a culture of responsibility and awareness, ensuring that every individual understands the importance of corporate social policies and adopts behaviors consistent with the established principles. Employees are encouraged to report any behavior that does not comply with company policy through designated communication channels, without fear of retaliation.

5. Monitoring and Verification of Implementation

To ensure the effective implementation of corporate policy, the company is committed to continuously monitoring its business practices and conducting periodic reviews to ensure compliance with all provisions. Internal audits and regular inspections are conducted to assess adherence to regulations and corporate policies. Every employee has the right to be informed about policy updates and changes, actively participating in periodic meetings, training sessions, and company-organized events. In cases of non-compliance, the company will take prompt corrective measures, continuously striving to improve its operations.

6. Communication and Transparency



The company is committed to maintaining open, transparent, and accessible communication regarding its social policy to ensure that all stakeholders (employees, suppliers, customers, and communities) are aware of its practices and commitments. Any significant changes to corporate policies will be appropriately communicated through official channels, such as meetings, internal newsletters, and official documents, to ensure that all workers are updated and informed.

7. Collaboration with Social Partners

The company recognizes the importance of close collaboration with trade unions and other social partners to ensure that social policies are continuously aligned with workers' needs and evolving regulations. Labor relations are considered a fundamental element in improving working conditions and promoting social dialogue to create a harmonious and productive work environment.

