

ETI SPA, also in light of the current socioeconomic scenario, has deemed it necessary and appropriate to implement a Social Responsibility Management System compliant with the SA8000:2014 standard. This system integrates with the existing and implemented quality, environmental, and safety management system. This is done with a strong commitment to ensuring the entire organization's commitment to respecting ethical work practices and rejecting and rejecting all working conditions characterized by exploitation, discrimination, unhealthy conditions, and inhumanity.

To this end, and to ensure the proper implementation of its Social Responsibility Management System, **ETI SPA** ensures the involvement of all internal resources within the organization involved in various capacities in managing the various operational processes. At the same time, **ETI SPA's** application of its Social Responsibility Management System requires the involvement of all suppliers of products, services, and activities that collaborate with the Organization. The Organization expects them to guarantee their commitment to social responsibility and, more generally, their compliance with all the requirements of the reference Standard.

For these reasons, **ETI SPA**, through this Policy, communicates to all internal and external stakeholders its intention to operate effectively and transparently in order to guarantee its commitment to continuously improving its corporate social management system through compliance with all the requirements of the SA8000:2014 standard and all related national and international reference standards, or all applicable and signed regulatory references.

Company personnel participation is ensured through the sharing of all key system documents as well as various regulatory requirements set forth in the reference standard, which are the subject of information, training, awareness-raising, and periodic communication.

The primary objective of **ETI SPA's** management is to ensure that the following core principles and commitments within the SA8000:2014 framework are known and respected both within its own organization and by all company suppliers involved.

- a. **Child and Minor Labor:** Refusal to use child/minor labor in the company's production cycle, with monitoring and verification of workers' ages at the time of hiring;
- b. **Forced or Compulsory Labor:** Refusal of any form of forced or compulsory labor and prohibition on employing personnel against their will and/or under threats or coercion, as well as prohibition on charging workers, in whole or in part, for costs and commissions related to hiring;
- c. **Health and Safety:** Constant and regular compliance with all mandatory occupational health and safety requirements and compliance with the relevant provisions of the company's operating procedures and instructions adopted in its management system;
- d. **Freedom of Association and the Right to Collective Bargaining:** Respect for the right of any employee to form, organize, or join trade unions of their choice and to bargain collectively with the Company, without this resulting in any negative consequences or retaliation; the Organization is fully committed to complying with all the requirements set out in the category-specific collective bargaining agreements or sector agreements;
- e. **Discrimination:** **ETI SPA** does not engage in or promote any form of discrimination in hiring, compensation, training, promotion, termination of employment, or retirement based on national, territorial, or social origin, race, caste, religion, disability, gender, religious or sexual orientation, marital status, social affiliation, political beliefs, age, or any other condition that could give rise to discrimination. Within the Organization, threatening, abusive, or exploitative behavior, gestures, language, or physical contact are absolutely condemned.
- f. **Disciplinary Practices:** **ETI SPA** does not engage in, implement, or promote practices of corporal punishment, mental or physical coercion, or verbal abuse. All disciplinary measures taken by the Organization are governed exclusively by the law and the applicable National Collective Labor Agreement (CCNL) or industry agreements. All possible disciplinary measures to be adopted are communicated to workers by sharing specific procedures, posting the company Disciplinary Code, where adopted, in commonly consulted and easily accessible areas and/or through identified digital channels (e.g., internal emails, website, social media)**Orario di lavoro:** assoluto rispetto dei giorni di riposo e dei limiti di lavoro settimanali previsti, dei limiti di lavoro straordinario e di tutte le altre prescrizioni di legge e del CCNL di categoria applicabili o Accordi di Settore in materia di gestione degli orari di lavoro;
- g. **Compensation:** **ETI SPA** ensures that its staff's compensation complies with applicable legislation, the applicable National Collective Labor Agreement (CCNL), or industry agreements;
- h. **Management System:** **ETI SPA** ensures the effective implementation and enforcement of the Social Responsibility Management System adopted in accordance with the SA8000:2014 standard, which aims to monitor company performance and pursue continuous improvement. This also includes defining and implementing the necessary monitoring measures, adopting corrective actions, and adequately allocating resources by Company Mana.

ETI SPA's management has promoted the establishment of a Social Performance Team (SPT), composed of an equal number of a management representative and an elected employee representative. This team has the authority and necessary resources to monitor and ensure compliance of the implemented company system with the SA8000:2014 standard. All company personnel and various stakeholders have the opportunity to contact the SPT with any ethical or social concerns. To this end, **ETI SPA** has established and made available to its personnel a communication system to manage reports regarding partial or total non-compliance with the requirements of the SA8000:2014 standard, defined as follows:

- through the Workers' Representative for Ethics (RLE) of **ETI SPA**, by submitting the report and/or complaint verbally, with the option to remain anonymous (in which case, the RLE will record the report on this form and initiate its management);
- by completing the appropriate form (MOD 01.21 "Worker Reporting Form"), choosing, again, whether to sign it or remain anonymous;
- by hand-delivering the appropriate forms, signed or anonymous, MOD 01.21 "Worker Reporting Form" or MOD 02.21 "Interested Party Complaints Reporting Form" to the Organization using the mailbox located outside the operational offices in Cesena (FC) and Guagnano (LE);
- by hand delivery of the prepared forms MOD 01.21 "Worker Reporting Form" or MOD 02.21 "Interested Party Complaints Reporting Form" directly to your Workers' Ethics Representative (RLE);
- by email, sending everything to segnalazioni.etica@etispa.com;
- through the adopted SA8000 Certification Body (APAVE CERTIFICAZIONE ITALIA SRL at the following numbers: telephone +39 06 33270123, e-mail stefano.bertini@apave.com, website <https://www.apave-certification.it/>);
- through the SA8000 Accreditation Body (SAAS Social Accountability Accreditation Services) - 9 East 37th Street, 10th Floor - New York - NY 10016 - tel: +1-212-684-1414 - fax: 1-212-684-1515, info@sa-intl.org

The above-mentioned reporting forms for various interested parties are publicly available in a specific section of the company website (<https://www.etispa.com/>) or can be requested by email at segnalazioni.etica@etispa.com.

Responsibility for establishing, implementing, and maintaining the Integrated System is entrusted to the System Manager, who reports the results achieved and any issues that arise to Management.

The Organization evaluates the timely implementation of the contents of its Social Responsibility Management System, the effectiveness of the actions undertaken, and the accuracy of this SA8000 Policy document through periodic Management Reviews, which take into account the results of direct feedback from staff and stakeholders, as well as analysis of company monitoring and internal audits.

General Management emphasizes that achieving the objectives defined above is the responsibility of all **ETI SPA** personnel and therefore involves every corporate function within the scope of their assigned tasks.

Therefore, General Management is committed to ensuring that this Policy is understood, accepted, and supported at all organizational levels through adequate and ongoing training for all personnel. Records of these awareness-raising/training activities, generally conducted through meetings and/or internal meetings, are maintained by the System Manager.

To ensure the SA8000 Policy is implemented to its fullest extent, General Management is committed to supporting it with all necessary technical, IT, and logistical tools.

A copy of this SA8000 Policy document is posted in common areas of the company headquarters(s), communicated to all interested parties who make a reasoned request and publicized on the company website.