

SOCIAL RESPONSIBILITY MANAGEMENT SYSTEM POLICY

of AVANTI2 SRL

AVANTI2 SRL, aware of the role played in its economic and social relations, assumes a commitment to Social Responsibility, laying its foundations on the incessant search for the improvement of people's working conditions and respect for their dignity and freedom.

The Top Management is firmly convinced that its commitment to Social Responsibility can influence its contractual relationships, thus guaranteeing a progressive diffusion of ethical and social principles/values to an increasingly wider sphere of stakeholders.

In this sense **AVANTI2 SRL**:

- considers its staff as its greatest resource: it guarantees their rights and supports their professional and personal development;
- considers its suppliers fundamental both for achieving the quality of its products and services and for achieving social equity objectives;
- supports dialogue with trade unions while respecting the rights and wishes of its staff.

AVANTI2 SRL formally undertakes the commitment to:

- comply with all the requirements of the SA8000:2014 and ISO 26000:2010 Standards;
- observe national laws, other laws and requirements in force signed by it, including the provisions, international recommendations and their interpretations officially issued by the bodies responsible for human rights (ILO - UN);
- adapt this document to regulatory developments in the sector and to the needs deriving from the requirements defined in its code of ethics or to other needs of an ethical-social nature.

To achieve its objectives, **AVANTI2 SRL** expresses its desire to involve and share commitments for widespread Social Responsibility throughout the supply chain of products or services in compliance with the following requirements:

Child and child labour

In compliance with national and international laws in support of the protection and safeguarding of the psycho-physical development of the child, **AVANTI2 SRL** does not resort to the employment of minors nor does it support the use of child labour. In the event that the erroneous presence of a minor is found, the Company will implement adequate support and recovery actions for the minor involved.

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Forced and compulsory labour

AVANTI2 SRL does not use or even support any form of forced or compulsory labour in accordance with the ILO 29 convention. The staff is free to carry out their work within the terms and methods agreed according to the relevant National Labour Contract. In compliance with privacy laws, the delivery of one's documents at the beginning of the employment contract, or other forms of deposit or withholding of part of the salary (allowances, bonuses, etc.), in order to extort work services is not required.

Health and safety at work

In compliance with national laws, **AVANTI2 SRL** guarantees a safe and healthy working environment.

With particular reference to its Risk Assessment Document and internal procedures aimed at preventing potential workplace accidents, **AVANTI2 SRL** has implemented all appropriate actions to limit the causes of potential risks.

The Management Representative for Health and Safety supervises the application of safety procedures during the performance of work activities.

The provision of health and safety training programs is guaranteed both for new hires and in the event of potential dangers detected during work and in all cases defined by the law in force.

Freedom of association and right to collective bargaining

AVANTI2 SRL ensures the right of workers to form, participate and organize trade unions without any form of retaliation or discrimination against trade union representatives.

Furthermore, **AVANTI2 SRL** provides means and spaces for communication with workers in order to guarantee and promote collective bargaining.

Discrimination

AVANTI2 SRL, in accordance with the ethical principles subscribed to by it, does not support forms of discrimination based on race, sex, social class, national origin, caste, birth, religion, disability, sex, sexual orientation, family responsibilities, marital status, trade union membership, political opinions, age or any other expression of discrimination.

For all these conditions that require particular needs or the exercise of specific practices/principles, **AVANTI2 SRL** ensures to its workers the free exercise of these rights. These guarantees are ensured throughout the entire career path from personnel selection, hiring, access to training, promotions, dismissal or retirement.

AVANTI2 SRL guarantees and imposes behavioural rules that ensure behaviour and language that

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respect the individual dignity of each individual.

Disciplinary procedures

In accordance with the company policy and in full compliance with the applicable legislation, **AVANTI2 SRL** takes care of the observance of the behavioural rules aimed at protecting the dignity of all staff by prohibiting: any form of physical and mental coercion, corporal punishment and severe or inhuman treatment therein including verbal abuse.

Working hours and remuneration

AVANTI2 SRL supports the economic recognition of its human resources in accordance with the laws that regulate company coordination such as national employment contracts, second level company negotiations and trade union agreements.

From working hours, to salary levels, to the regulation of holidays and rest breaks as well as overtime, an extensive application of the principles established by current legislation is ensured, i.e. a more guaranteed extension of the workers' position.

Anti-corruption Conduct

AVANTI2 SRL has a position of absolute intransigence towards any form of corruption, even towards personnel of private companies.

In this sense, the Company fully feels its commitment to guarantee actions and behaviours based exclusively on criteria of transparency, correctness and moral integrity, which prevent any attempt at corruption.

This position contributes to complying with the anti-corruption legal requirements and the commitments to which the Company has voluntarily bound itself through the adoption of its Code.

AVANTI2 SRL's Corporate Anti-Corruption Policy is contained in the following concepts:

- Management's commitment to preventing corruption by respecting legislative compliance and the requirements of the anti-corruption management system;
- zero tolerance, appropriate procedures, active role of management, effective communication, constitute the reference framework for the definition and pursuit of improvement objectives;
- encouragement to report suspicious cases in good faith, guaranteeing the protection of the whistleblower in every form;
- sanction for any form of failure to comply with the corruption prevention procedures and the contents of this company policy;
- commitment to continuous improvement of corruption risk management and prevention

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processes.

See attachments ALLSR04 **AVANTI2 SRL Corporate Code of Ethics** and ALLSR05 **AVANTI2 SRL Anti-Corruption Code of Conduct**,

The commitment to Social Responsibility that **AVANTI2 SRL** has undertaken translates into actions aimed at:

- implement a Social Responsibility Management System compliant with SA8000:2014 and ISO 26000:2010 standards;
- implement and keep the Social Responsibility Management System updated in order to guarantee continuous improvement of its performance;
- raise awareness among all stakeholders of ethical and social issues by giving them visibility through the website or through other appropriate forms of advertising;
- make this Policy public and accessible to all company levels by posting it on the notice board and providing appropriate training.
- account for the significant environmental impacts associated with its activities and decisions;
- clearly and completely disclose the information connected to the activities and decisions for which he is responsible;
- pursue honesty, fairness and integrity in the implementation of its activities and decisions;
- respect, take into consideration and respond to the interests of its stakeholders;
- comply with all applicable legal requirements and international and national rules of conduct;
- pursue continuous improvement of its management system for social responsibility;
- consider the expectations of local communities, customers, employees, suppliers of goods/services, environmental associations and in general of all qualified stakeholders, evaluating the social impacts that corporate choices may have on them and guaranteeing a two-way system of communication, access to information and submission of observations and complaints.
- make its principles of protection and respect for the environment the foundation for guaranteeing its success in the market;
- guarantee compliance with all current national and community provisions regarding accident prevention, also considering technical regulations and international standards.

The Top Management makes all human and economic resources available in order to allow the maintenance and achievement of the highest Social Responsibility performances compliant with

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the reference standard.

The subjects to refer to in the context of the Social Responsibility System adopted are:

Management Representative: Mrs. Paola Nava

Workers' representative: Mrs. Benedetta Lazzati

Social Performance Team: Mrs. Paola Nava – Mrs. Benedetta Lazzati

Certification Body: Bureau Veritas Italia Spa Divisione Certificazione

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Milano (MI), 30/06/2023