

SOCIAL ACCOUNTABILITY AND ANTI-CORRUPTION POLICY

Di Lodovico S.r.l is aware of its role and its responsibilities within the economic and social community and wishes to distinguish itself as a responsible operator maintaining a positive reputation in all its business endeavours. Di Lodovico S.r.l shall conduct its business with integrity, respecting the laws, cultures, dignity and rights of individuals.

In practice this means:

- considering its EMPLOYEES as a strategic resource, ensuring respect for their rights and promoting their professional and personal development;
- considering its SUPPLIERS as partners, not only for the implementation of activities, but also in the applications of shared values for social responsibility;
- considering its CLIENTS as a fundamental element of its success, working for their satisfaction within the rules of social responsibility.

With this in mind, Di Lodovico S.r.l must ensure the following requirements are met both in its working environment and in the supply chain:

BASIC WORKING CONDITIONS

- Respect for the dignity and freedom of the employees.

The use of any form of physical, corporal and mental coercion, verbal offenses or any offense against the personal dignity of any employee or collaborator is forbidden.

CHILD LABOUR

- Effective abolition of child labour.

Our business and associates shall not resort to or support the use of child and underage labour in general. The only exception is represented by the admission of students not yet over 18 for internships, in accordance with applicable regulations and school-work projects.

FORCED LABOUR AND HUMAN TREATMENT

- Forbidding all forms of forced and compulsory labour.

It is forbidden to employ personnel against their will, to resort to any form of work under the threat of punishment or to adopt any conduct that falls into the categories of bullying, harassment, abuse, physical or mental coercion, threats and similar.

HEALTH AND SAFETY OF WORKERS

- Right to safety and health at work.

The company provides a safe and healthy workplace. It must carry out a suitable risk assessment and management programme, provide adequate training and appoint a Health and Safety Representative to oversee the requirements of the risk assessment and its follow ups.

FREEDOM OF ASSOCIATION

- Respect for freedom of association and effective recognition of the right to collective bargaining without any discrimination or retaliation. The company supports the election of union representatives and its employees' membership.

WORKING TIME AND WAGES

- Right to a fair wage and proper working hours.

The company guarantees the recognition and application of current legislation and subsequent updates ensuring the worker is guaranteed a fair wage and proper working hours.

Di Lodovico S.r.l recognizes and grants all benefits provided for in the law such as: holidays, sick leave, parental leave, social security etc.

Overtime is paid in accordance with applicable legal provisions or collective agreements. Salaries are paid directly to the workers concerned, and are subject to the restrictions or deductions permitted only by the applicable legal provisions and/or collective agreements.

EQUAL PAY AND NON-DISCRIMINATION

- Right to equal pay and non-discrimination

Di Lodovico S.r.l treats its staff with dignity and respect and is committed to enhancing and promoting the diversity and development of each individual.

Di Lodovico S.r.l prohibits any discrimination related to race, gender, colour, nationality, creed, ethnicity, political opinion, social origin, sexual orientation, age or disability.

Discriminatory practices at any stage of the employment relationship (including recruitment, training, promotion or dismissal) and while conducting Company business with outsiders, are strictly prohibited.

EMPLOYEES with DISABILITIES

- Right to work, non-discrimination and job conditions.

Di Lodovico S.r.l ensures full compliance with regulations regarding disability and placement of disabled personnel. It prohibits all forms of discrimination while guaranteeing infrastructure and working conditions that meet the needs of staff with disabilities and follow mandatory standards and legislation.

ETHICS AND ANTI-CORRUPTION

Di Lodovico S.r.l is committed to uphold the standards of ethical business and integrity to prevent corruption in all its forms including extortion and bribery. We aim to establish and maintain a culture of integrity based on compliance with the laws and regulations. Our on-going moral commitment to our core values is a crucial point for the sustainable development of our business.

With this in mind, Di Lodovico S.r.l undertakes to:

- prohibit corruption and ensure the achievement of the highest compliance with national and international regulatory standards in the field of anti-corruption and anti-trust;
- promote fair competition and develop ethics and legality in economic relations, to protect the market and to fight all forms of illegality;
- promote understanding, raise awareness and provide training on the issues of ethics and the prevention of corruption for all his employees.
- fulfil the requirements of the management system for the prevention of corruption and develop ongoing improvement.
- develop and implement effective methods and processes to minimise the risk of introducing counterfeit parts and materials into deliverable products
- promote responsible trade in line with export controls and sanctions regulations
- encourage the reporting of fraud, of any suspected certain or alleged attempt of corruptive action and any violation of the law. Di Lodovico S.r.l provides dedicated channels, modalities and whistleblowing procedures suitable to protect the reporter and those carrying out the investigation.

DATA PROCESSING

In addition to compliance with privacy law under EU Regulation 679/2016 (GDPR) Di Lodovico S.r.l undertakes to:

- establish a privacy management and data processing system by June 2021;
- safeguard all written and oral information;
- take all necessary precautions and security measures to protect information, confidential data, knowledge, materials through appropriate physical and electronic security procedures and to ensure the nature of their confidentiality is not compromised in any way and is properly destroyed when no longer necessary.
- to comply with all the applicable laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks

SOCIAL RESPONSIBILITY MANAGEMENT SYSTEM

In order to ensure continuous monitoring and improvement, Di Lodovico S.r.l shall commit to:

- applying all requirements and standards of the SA8000:2014 and ensure the constant monitoring and improvement of its Management System for Social Responsibility. Defining - as part of the Management Review meetings - specific improvement objectives and verifying their achievement through the drafting of the SA8000 Annual Report;
- plan and implement appropriate corrective actions following the detection of non-conformity;

- comply with national laws, all other applicable laws and other requirements to which the organization adheres, (pertaining to the Social Responsibility of the Organization) as well as to the provisions contained in international official documents and their interpretations;
- evaluate and select suppliers based on their ability to meet the SA8000:2014 requirements and the principles of social and environmental responsibility;
- define in a clear and documented manner the roles, responsibilities and authorities of its staff;
- appoint a Senior management representative and facilitate the appointment of a worker representative for the SA8000;
- ensure that all staff receive adequate training on the requirements of the standard.

SOCIAL COMMITMENT

Di Lodovico S.r.l considers social commitment as dedication to contribute positively in the local community and in society in general with specific donations to the territory and an active commitment to cooperate in social projects of integration. In this perspective, we participate in the project School-Enterprise, a training project for students from the Technical and Mechanical Institute and in the YOU CAN project, for the inclusion of Non EU citizens in the job market.

DIVULGATION

To ensure this Policy is understood, implemented and supported at all levels and by all employees, the following initiatives have been implemented:

- strategic posting to ensure viewing by all staff;
- staff training and provision of a SA 8000 manual for all applicants.

Tortoreto, lì 22/06/2020

The Management

The Social Responsibility System Employee Representative
