

**SOCIAL RESPONSIBILITY AND ANTI-CORRUPTION POLICY**

Di Lodovico S.r.l., fully aware of its role and responsibilities within the broader economic and social landscape, is committed to distinguishing itself as a company that not only embraces social responsibility but actively promotes it through concrete actions and long-term vision.

In line with this commitment, Di Lodovico S.r.l.:

- values its EMPLOYEES as a strategic resource, ensuring respect for their rights and actively supporting their professional and personal development.
- considers CUSTOMERS a crucial factor in the company's success, dedicating itself with professionalism and commitment to meeting their expectations, while upholding the highest standards of social responsibility.
- collaborates with SUPPLIERS as strategic partners, both in carrying out business activities and in actively promoting social responsibility.

Therefore, the company requires all employees, external collaborators, customers, and suppliers to adhere to the following fundamental principles, which guide the organization itself:

**FUNDAMENTAL WORKING CONDITIONS**

- Safeguard the freedom and dignity of every employee.
- Prohibit any form of physical, psychological, or mental coercion, including verbal abuse or any other actions that may undermine the personal dignity of employees and collaborators.

**CHILD AND MINOR LABOUR**

- Absolutely prohibit any form of child or underage labour. The only exception concerns the inclusion of underage students in internship programs, strictly in accordance with current legislation on school-to-work transition schemes.

**FORCED LABOUR AND HUMANE TREATMENT**

- Forced or coerced labour: prohibit the employment of personnel against their will or the imposition of any activity under threat of sanctions and/or punishment. Any conduct related to bullying, harassment, abuse, or physical/mental coercion, intimidation, or similar behaviour is strictly forbidden.
- Respect for land rights and natural resources: uphold land rights and promote the sustainable use of forest and water resources, ensuring that any cases involving forced evictions are handled with a humane and lawful approach.

Although such circumstances do not fall within our areas of operation—being already prohibited under national law—Di Lodovico S.r.l. is committed to ensuring fairness, justice, and respect for human rights in all its activities, actively collaborating with local communities and strictly complying with applicable regulations.

**WORKERS' HEALTH AND SAFETY**

- Guarantee the right to health and safety for all workers by ensuring a healthy and safe working environment through thorough risk assessment and management, supported by appropriate training programs for all employees. In accordance with current legislation, a Workers' Health and Safety Representative has been appointed to oversee compliance with the measures outlined in the risk assessment.
- Comply with legal requirements on occupational safety while avoiding the use of private or public security services. This approach is justified by the current risk assessment of the region and country in which Di Lodovico S.r.l. operates, which presents no significant threats of violence from the public or the community.

**FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

- Ensure that employees are free to join trade unions and elect union representatives without interference or obstruction.
- Guarantee protection from any form of retaliation, discrimination, or adverse treatment as a result of trade union membership or participation in union activities.

**WORKING HOURS AND WAGES**

- Ensure the right to a fair wage and equitable working hours, in full compliance with current legislation and any future updates regarding remuneration and working time.
- Recognize and provide the benefits and incentives established by law, ensuring the granting of all legal rights, including paid leave, public holidays, parental leave, and social security.

- Pay wages directly to the employees concerned, ensuring that payments are subject only to deductions or restrictions permitted by applicable laws or collective agreements.

#### **GENDER EQUALITY, DIVERSITY AND INCLUSION**

- Ensure equal pay between men and women, and a firm commitment to preventing any form of discrimination based on gender, nationality, or ethnicity.
- Prohibit all forms of discrimination based on race, gender, colour, nationality, creed, political opinion, social origin, sexual orientation, age, or disability, whether visible or not. This prohibition applies to all company activities, including interactions with external parties.
- Ensure that all personnel are treated with dignity and respect, while recognising and fostering individual diversity and promoting an inclusive culture.
- Guarantee fairness and impartiality throughout all stages of personnel management, including recruitment, onboarding, compensation, mobility, performance management, and career development. Ensure job security and equal opportunities for professional growth, regardless of gender, age, creed, ethnicity, or sexual orientation.
- Promote individual autonomy and empowerment in a neutral and inclusive manner, by embedding principles of diversity and inclusion into organisational processes.
- Monitor diversity and inclusion indicators to assess and ensure the effectiveness of inclusion initiatives.

#### **PERSONS WITH DISABILITIES**

- Recognize and support the right to employment for all individuals by ensuring equal opportunities and providing an inclusive environment for workers with disabilities.
- Prohibit all forms of discrimination against personnel with disabilities, whether visible or non-visible, and ensure that all employees are treated fairly and with respect, regardless of the nature of their disability.
- Promote inclusion and ensure compliance with current regulations protecting the rights of persons with disabilities.
- Provide appropriate infrastructure and working conditions that meet the needs of employees with disabilities, implementing the necessary adjustments and inclusive measures to ensure their full access and participation in the workplace.

#### **ENVIRONMENT**

- Ensure compliance with applicable environmental laws and regulations related to business activities, as well as with other environmental protection requirements to which the organization subscribes.
- Promote all necessary actions to prevent, reduce, and minimize pollution of air, water, and soil.
- Monitor the environmental impact of business activities, including the tracking of CO<sub>2</sub> emissions, in order to implement targeted actions for their reduction.
- Optimize the use of resources through targeted initiatives aimed at reducing consumption, eliminating waste, and promoting the recycling and reuse of scraps and by-products.
- Encourage the development of energy consumption monitoring processes, with the objective of reducing overall energy use.
- Adopt operational methods in production and service delivery processes that minimize environmental impact.
- Promote awareness and training on environmental issues.
- Ensure the protection of biodiversity and local ecosystems, as well as the respect and safeguarding of indigenous populations.

#### **ETHICS AND ANTI-CORRUPTION**

- Prohibit corruption and extortion by ensuring full compliance with national and international regulatory standards on anti-corruption and antitrust.
- Promote and uphold ethics and legality in economic relations, protecting the market and combating all forms of illegality.
- Raise awareness and provide training to employees on ethics and corruption prevention.
- Fulfil the requirements of the anti-corruption management system and pursue continuous improvement.
- Encourage the reporting of fraud and suspected corrupt activities, as well as legal violations, through dedicated channels and a whistleblowing policy that protects both the whistleblower and those conducting investigations.
- Develop and implement effective methods and processes to minimize the risk of counterfeit parts and materials being introduced into supplied products.

- Promote responsible trade in compliance with regulations governing import and export controls and sanctions.

#### DATA PROTECTION

- Ensure the protection of personal and confidential information through strict compliance with privacy regulations, as established by EU Regulation 679/2016 (GDPR).

In addition to these obligations, the company is committed to:

- Ensuring the safeguarding of both written and verbal information, by guaranteeing it is managed with the utmost confidentiality.
- Implementing security measures and adopting all necessary precautions to protect data, proprietary knowledge, and confidential materials.
- Respecting intellectual property rights by ensuring appropriate protection against unauthorized disclosure and upholding rights related to patents, copyrights, and trademarks.

#### SOCIAL RESPONSIBILITY MANAGEMENT SYSTEM

- Apply all the requirements of the SA8000:2014 standard.
- Ensure continuous monitoring and improvement of the social responsibility management system. During management review meetings, the company defines specific improvement objectives and verifies their achievement through the drafting of the SA8000 Review/Report.
- Plan and implement appropriate corrective actions following the identification of non-conformities.
- Comply with national laws and applicable regulations, as well as with the provisions of official international documents and their interpretations regarding corporate social responsibility.
- Implement effective procedures for the selection and evaluation of suppliers and subcontractors, adopting criteria that ensure their ability to meet SA8000:2014 requirements and demonstrate commitment to ethics, social responsibility, and environmental sustainability.
- Clearly define and document roles, responsibilities, and authorities of all personnel.
- Appoint a management representative and support the appointment of a workers' representative for SA8000.
- Ensure that all personnel receive appropriate training on the principles of social responsibility and the requirements of the standard.

#### SOCIAL COMMITMENT

Di Lodovico S.r.l. considers social commitment a priority, dedicating itself to making a positive contribution to the local community and society at large through donations and sponsorship of social projects. To ensure understanding, support, and dissemination of this Policy at all levels of the organization, Management has implemented the following initiatives:

- Display of the Policy in key areas visible to all personnel.
- Communication via email to all employees, suppliers, and clients.
- Staff training and availability of the SA8000 Manual upon request.
- Online publication on the official website: [www.dilodovicosrl.com](http://www.dilodovicosrl.com).

Stakeholders may submit complaints or reports, including anonymously, using the “SA04 – Complaints and Suggestions Form” available on the website, which provides also the appropriate channels for submitting such reports.

Tortoreto 13/03/2025

THE MANAGEMENT

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