

# POLICY

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## HEALTH AND SAFETY SOCIAL RESPONSIBILITY ETHICS ENVIRONMENT QUALITY

### ENVIRONMENTAL SOCIAL GOVERNANCE ESG

The main driver of growth is the company's sustainable commitment to Environmental, Social and Governance (ESG) issues, based on an understanding of the needs and expectations of its stakeholders. This commitment translates into the identification of effective and systemic company policies and strategies, supported by adequate resources made available by management, to achieve the objectives set.

The company's success depends on the combined skills and contributions of all its staff. The aim is to create an environment that encourages teamwork and promotes active participation.

The fundamental criteria for evaluating candidates during the selection process are:

- Competence and awareness;
- 2 Fairness and frankness, as well as mutual trust and respect.

The company must be recognised as an organisation with a high degree of ability to meet the needs and expectations of stakeholders and the applicable requirements in compliance with regulatory elements and their interpretation, such as laws, regulations and other local and national laws, applicable regulations, prevailing industry standards, other requirements to which the organisation adheres, as well as the standards adhered to. When such laws, regulations or other requirements to which the organisation adheres and the standard cover the same subject, the provision that is most favourable to workers shall be applied, while also respecting the principles of international instruments such as conventions, codes of conduct, universal declarations, international agreements, guiding principles, etc. becoming a benchmark in the context in which it operates, consistent with the nature of the risks assessed and the opportunities arising from them, using a risk-based thinking approach.

In this sense, the company is committed to pursuing the following GENERAL principles with an integrated approach:

- Identify hazards and assess risks in advance, identify the advantages and assess the opportunities arising from existing activities and for each new activity and/or process in order to adopt solutions capable of preventing anomalies and, in any case, mitigating, as far as technically possible, the risks generated and their effects and ensuring business continuity;
- Define measurable improvement objectives and ensure their achievement through adequate planning and performance monitoring;
- Promote awareness that each employee is responsible for aspects related to their work and for the continuous improvement of processes;
- Establish close working relationships with suppliers and contractors, requiring them to comply with the policies, laws and sustainable commitments adopted by the company, monitoring their performance and providing clear information for the acquisition of products and services;
- Train, inform and educate staff on key sustainability issues and on how to carry out company activities correctly, as described in the Manual, in the Quality, Safety, Environment and Social Responsibility Management System Procedures and in the Code of Ethics;
- Promote the involvement of workers and their representatives in the management and improvement of the system and the daily activities carried out by each individual;
- Guarantee to workers and their representatives, public parties involved, customers, suppliers and stakeholders in general that every single operational phase is carried out in compliance with current legislation and, where possible, with a view to improvement, going beyond regulatory requirements, including through consultation and participation, minimising the number of non-conformities and continuously assessing their type and cause;
- Monitoring the impact on the entire value chain, involving stakeholders, in particular suppliers and business partners, to improve their performance, promoting the principles of sustainability in procurement decisions;
- Adhere to the 2030 Agenda consisting of the 17 Sustainable Development Goals (SDGs), an action programme for people, the planet and prosperity, signed on 25 September 2015 by the governments of the 193 member countries of the United Nations and approved by the UN General Assembly;
- Adhere to the 10 universal principles relating to human rights, labour, the environment and anti-corruption established by the United Nations Global Compact (UNGC).

The company also aims to observe the following SPECIFIC principles with a uniquely structured approach:

# **HEALTH AND SAFETY**

- Ensure the health and safety of workers in the workplace;
- Prevent near misses, accidents and occupational diseases,
- Promote the progressive elimination of risks associated with the presence of substances and mixtures that are hazardous to the health and safety of workers at the company premises, or replace them with less hazardous alternatives;
- Operate with equipment, machinery and systems that comply with current health and safety regulations, ensuring a healthy workplace for all those working on behalf of the company;
- Minimise the risks to personnel that may arise from fire and/or other emergencies, such as floods, earthquakes, power outages, severe weather events, etc. This objective will be achieved by ensuring that precautions are taken to prevent fires from occurring, ensuring that procedures are in place to minimise the effects of such scenarios and the possible evacuation of the premises.

# SOCIAL RESPONSIBILITY

- Comply with and adapt to all the requirements of the SA8000 standard;
- Integrate the social dimension into business strategies and enhance the creation of social value by companies. Adopt an integrated approach to sustainability that values the social dimension throughout the entire value chain, giving it equal importance to the environment and governance, assessing the cross-cutting nature of risks and, at the same time, the potential benefits that social interventions can bring to other dimensions, with a view to a 'just and inclusive transition', contributing to the generation of progress and positive social impact;
- Respect and promote DEI Diversity, Equity and Inclusion within the company, along supply chains and in communities, combating all forms of discrimination and recognising the value of diversity and equity, adopting specific policies, projects to protect people at risk of discrimination and inclusive language, integrating commercial practices that protect consumers, reduce inequalities and provide innovative, transparent and anti-corruption solutions, with a particular focus on vulnerable targets and equitable access to goods and services:
- Commit to the well-being of workers. Create working conditions and spaces that promote people's health and well-being, offering corporate welfare benefits and adopting work-life balance practices with a focus on vulnerable targets, going beyond legal requirements, setting improvement targets and periodically measuring worker satisfaction and the internal climate.
- Support collective actions for the well-being of communities. Participate in alliances, partnerships and initiatives together with other companies, governments, institutions, nonprofit organisations and local associations for co-design activities, networking and promoting innovation, in order to ensure greater well-being for communities;
- Measure and report your social impact transparently. Track your impact on stakeholders and society in a measurable way, involving them in the process, using KPIs and trend analyses that objectively show the progress made over time.
- Communicate and be an ambassador. Communicate your efforts, progress and difficulties externally in a transparent manner, with the aim of involving new CEOs and chairpersons in a joint effort and increasing stakeholder awareness of the social dimension of corporate responsibility.
- Promote a culture of social responsibility;
- Prevent human rights violations;
- 10. Ensure equitably distributed conditions of human well-being, in order to enable the exercise of the right to live in an environmental and socio-economic context that allows individuals to express their individuality;
- The Company is committed to implementing human rights due diligence practices throughout its supply chain, assessing and mitigating the social and environmental risks associated with its business partners in accordance with the EU Corporate Sustainability Due Diligence Directive (CSDDD);
- 12. Believing in sustainable development, attributing social value to people and supporting the view that the application of sustainability contributes to the achievement of economic results;
- Not using or supporting child labour ( ) or forced labour ( ) carried out by a child or minor under the minimum legal age for admission to employment, safeguarding the right to education of children during their compulsory schooling;
- 14. Eliminate the use of forced or compulsory labour in any form, excluding pressure, coercion or threats;
- 15. Ensure that human and labour rights are respected in relation to trade unions, such as freedom of association and the right to collective bargaining;



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- Combat all forms of discrimination, unequal treatment and harassment in recruitment and employment, wages, social benefits, access to training and career advancement based on diversity, race, nationality, religion, disability, gender, sexual orientation, trade union membership, political affiliation, etc., encouraging anonymous reporting of any violations
- 17. Apply the national collective labour agreement fully and impartially to all employees, paying the agreed wages and making the relevant social security, welfare and insurance contributions;
- Guarantee maternity and paternity protection, as well as protection for disadvantaged persons;
  Share the definition of corporate social responsibility (CSR) which, in addition to the objectives of profit and cost-effective management, requires socially responsible companies to generate value not only for shareholders and partners, but for all stakeholders;

Support activities aimed at resolving conflicts and eliminating human rights violations related to the extraction of certain minerals, tin, tantalum, tungsten and gold, classified as 3TG, from the area classified as a 'conflict region' in the eastern part of the Democratic Republic of Congo (DRC) and neighbouring countries

21. Ensure that every worker is treated with respect and dignity, prohibiting the use of any form of physical, psychological or verbal abuse, intimidation, harassment, corporal punishment or coercion of any kind.

Any disciplinary measures will be taken in full compliance with current legislation, in a fair, transparent and documented manner, ensuring the worker's right to be heard and to defend themselves.

22. Comply with current legislation on working hours, breaks, rest days and overtime, ensuring a fair balance between work and private life;

23. Guarantee decent wages, not lower than the legal or contractual minimum, and pay all wages regularly;

Guarantee freedoms that include the right to maintain access to, use and management of land and natural resources necessary for the realisation of the rights to an adequate standard of living, health and participation in cultural life. Freedoms also include the right to be free from interference, such as the right to be free from forced eviction or contamination and destruction of water bodies and fisheries.

#### **ETHICS**

- Implement virtuous, ethics-oriented behaviour:
- Pursue the principles set out in the Code of Ethics available on the company website.

# **ENVIRONMENT**

- Maintain the environmental balance influenced by the identified aspects;
- Prevent the emission of pollutants into the atmosphere, soil and surface and groundwater, protecting environmental matrices from pollution and/or alteration;
- Promote the transition to a circular economy for its activities and processes, both for the organisation and for the products manufactured, using a Life Cycle Assessment (LCA) approach, for example by preventing the production of waste, promoting its reuse and increasing its recovery;
- Activate investments and promote awareness among stakeholders of an approach aimed at reducing the consumption of resources, in particular electricity, gas, water, plastic, etc., encouraging recovery and reuse practices;
- Activate investments and promote awareness among stakeholders of an approach aimed at reducing atmospheric emissions, in particular greenhouse gases (GHG), with the goal of reducing net emissions by 55% compared to 1990 levels by 2030 (Fit for 55), as required by the 2015 Paris Agreements to limit global warming to 1.5°C above preindustrial levels and achieve climate neutrality, net zero, by 2050, as required by the European Green Deal inspired by the scientific findings of the IPCC (Intergovernmental Panel on Climate Change);
- Ensure the constant efficiency of the equipment used to reduce its impact on the environment and possible pollution;
- Promote the progressive elimination of risks associated with the presence of substances and mixtures that are hazardous to the environment at the company's premises, or replace them with less hazardous alternatives;
- Assess activities that may interfere with natural species and habitats in order to avoid and prevent negative impacts on biodiversity;
- Promote the use of renewable sources both on and off the grid, increasing the share of renewable sources in the energy mix;
- Protect human health and the environment from harmful noise emissions;
- Minimise risks to the environment that may arise from fire and/or other emergency events, such as spills, uncontrolled release of harmful substances into the atmosphere, pollution of soil, subsoil, surface water and groundwater, etc. This objective will be achieved by ensuring that precautions are taken to prevent accidents and that emergency plans are implemented to minimise the effects of such scenarios.

# QUALITY

- Satisfy the requirements of the Customer and interested parties, stakeholders;
- Prevent product and/or process anomalies to reduce waste and inefficiencies;
- Identify technological innovation needs to develop new products and processes in line with market expectations;
- Monitor customer satisfaction in order to improve perceived quality by delivering high-value products and services.

In conclusion, and based on the above, the main objectives are to ensure a constant commitment to the achievement of concrete and continuous improvement in Quality, Safety, Environment, Social Responsibility and Ethics, and the consequent prevention and reduction of anomalies.

The Management of SEA SPA

Nicola Sartori

The Employer for Safety SEA SPA

Lucilla Sartori