

# Policy Human Rights

Policy for Responsibility in the protection of Human Rights

June 24, 2024  
Version 1.0

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## PURPOSE AND FIELD OF APPLICATION

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Engineering, aware of its role within the community and in the communities in which it operates, believes that it is essential to ensure respect and protection of human rights in every area of its activities and its value chain, with the aim to provide an ethical, safe and fair working environment.

In this context, Engineering recognizes the importance of identifying, monitoring and remedying potential and current negative impacts deriving from its activities, those of its subsidiaries and related business relationships.

Therefore, Engineering defines, in this document, the philosophy, rules and application methods for respecting Human Rights, which are supposed to be the reference for the Group in order to increase awareness and strengthen respect for human rights within its sphere of influence.

This policy applies to all companies within the Engineering Italia Group.

## CHANGES AND UPDATES

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The need to modify and/or integrate this policy will be assessed in case of significant changes in the context in which the Group operates, as in the case of extension of the scope of application to foreign companies.

However, the policy will be reviewed on an annual basis when the system is reviewed.

## DEFINITIONS AND ACRONYMS

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**ENGINEERING GROUP (or just ENGINEERING):** the parent company Engineering Ingegneria Informatica SpA and its subsidiary companies, directly and indirectly controlled by the latter.

**CODE OF ETHICS:** Group Code of Ethics, which identifies the essential core of the values that represent the corporate culture, and which result in the management principles and policies that guide daily action. It is adopted by all Group companies.

**MODEL 231:** the Organization, Management and Control Models (pursuant to Legislative Decree no. 231 of 2001) of the Group Companies, approved by the relevant Boards of Directors, in order to prevent the commission of crimes pursuant to Legislative Decree 231/ 2001.

**STAKEHOLDER:** employees, collaborators, clients, suppliers, users of the service, social context.

## Normative requirements

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Engineering complies with local, national and other applicable laws, the prevailing regulations of the metalworking sector, as well as this Standard.

When these laws or regulations and the Standard concern the same topic, the provision that is most favorable to workers is applied.

In particular Engineering respects the following international principles:

- ILO Convention 1 (Work Time - Industry) and Recommendation 116 (Reduction of working hours).
- ILO Conventions 29 (Forced Labor) and 105 (Abolition of Forced Labor).
- ILO Convention 87 (Freedom of association and protection of the right to organise).
- ILO Convention 95 (Wage Protection).
- ILO Convention 98 (Right to organize and collective bargaining);
- ILO Conventions 100 (Equality of pay) and 111 (Discrimination – employment and profession).
- ILO Convention 102 (Social Security - minimum standards).
- ILO Convention 105 (Abolition of forced labour).



- ILO Convention 111 (Discrimination – employment and profession).
- ILO Convention 131 (Definition of the minimum wage).
- ILO Convention 135 (Workers' representatives).
- ILO Convention 138 and Recommendation 146 (Minimum age).
- ILO Convention 155 and Recommendation 164 (Safety and Health at Work).
- ILO Convention 159 (Professional and occupational reintegration – people with disabilities).
- ILO Convention 169 (Indigenous and tribal peoples).
- ILO Convention 177 (Home Work).
- ILO Convention 181 (Private Employment Agencies).
- ILO Convention 182 (Worst forms of child labour).
- ILO Convention 183 (Maternity Protection).
- ILO Code of Practice on HIV/AIDS and the World of Work.
- Universal Declaration of Human Rights.
- International Covenant on Economic, Social and Cultural Rights.
- International Covenant on Civil and Political Rights.
- United Nations Convention on the Rights of the Child.
- United Nations Convention on the Elimination of All Forms of Discrimination against Women.
- United Nations Convention on the Elimination of All Forms of Racial Discrimination.
- United Nations Guiding Principles on Business and Human Rights.

## 1.1 CORPORATE COMMITMENT

Engineering 's commitment to respecting human rights is stated in its Code of Ethics approved by the Board of Directors and extended to its subsidiaries. The Code, available on the company website, defines what the Group expects from employees, business partners and other parties directly connected to its activities, products or services for what concerns human rights. Through the Code of Ethics, Engineering renews its commitment to respect the human rights as defined by the UN Universal Declaration of Human Rights and Guiding Principles on Business and Human Rights and in the Declaration on Fundamental Principles and Rights at Work (ILO). Furthermore, it adheres to the ten principles of the Global Compact and it is inspired by the Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda in the definition of its activities and strategic objectives, directing its choices and development to contribute to the achievement of these objectives.

## 1.2 GOALS

With this Policy, Engineering communicates to its stakeholders the purpose to operate with correct and transparent methods in order to guarantee and improve the working conditions of its staff and with respect for individual dignity and freedom, also rejecting all working conditions characterized by inhumanity, exploitation, discrimination, unhealthiness. In this sense, Engineering aims to satisfy customers and stakeholders by ensuring that all activities are carried out in compliance with:

**Child labor:** Child labor is not allowed in Engineering and its suppliers. The use of youth work (between 15 and 18 years old) is avoided by checking identification documents during the hiring process. In the Code of Ethics there is a reference to compliance with national and international regulations and best practices.

**Forced and compulsory labor:** Forced and compulsory labor is not allowed in Engineering or its suppliers. The company prohibits its managers from abusing their position with the purpose of requesting services that are not attributable to ordinary work activities; the company's desire is to protect employees from acts offensive to the dignity of the person and from acts of psychological violence, from any type of harassment and from any discriminatory behavior.

**Health and safety at work:** in carrying out its activities, the Engineering Group considers as indispensable duties human health, environmental protection, and safety at work. The Group is committed, to pursue the objective of a continuous improvement of the safety and health of its employees by providing human, instrumental and economic resources, as an integral part of its activity and as a strategic commitment with regard to the main objectives of the company. About that, Engineering has implemented an ISO 45001 certified health and safety management system; the company has set up a Group "health and safety" function, which is responsible for the implementation and improvement of the management system; this function reports to the Chief Human Resources and Organization Officer.

**Freedom of association and right to collective bargaining:** a second level national agreement, which integrates and improves the conditions envisaged by the CCNL of the metalworking sector, is applicable to all Engineering personnel. Freedom of association, in terms of both membership and active participation in trade union organizations, is guaranteed by compliance with the rules established by the CCNL and the Workers' Statute, (Law 300/1970). Employees are therefore free to join any trade union organization and to meet when trade union meetings are called for which the company provides up to a maximum of 10 paid hours per year, as required by the relevant legislation. . Furthermore, collective company agreements recognize to the RR.SS.UU. (unitary union representatives) / RSA (company union representatives) some additional hours of union permits compared to those provided by the CCNL.

**Discrimination:** the company's will is to allow male and female candidates equal hiring opportunities and to make selections based on objective and meritocratic principles without any discrimination based on sex, race, age, state of health, disability, sexual orientation, political opinions, trade union membership and religious beliefs; the company's will is to protect employees from acts detrimental to the dignity of the person and from acts of psychological violence, from any type of harassment and from any discriminatory behavior. Throughout the entire career of the employee, the Company pays particular attention to equal opportunities for professional development and job promotions without discrimination based on sex, race, age, state of health, disability, sexual orientation, political opinions, trade union membership and religious beliefs. Procedures are provided



to deal with cases of discrimination, which are documented and reviewed in order to set up a documented remedy plan. The company promotes work/life balance and parenting by allowing to take advantage of Parental Leave and Paternity Leave and the possibility of Smart Working exemption for greater flexibility and protection in particular health situations of employees or their cohabiting family members.

**Disciplinary practices:** the code of ethics contains the company's commitment to "protecting its staff from acts of psychological violence, harassment of any nature and any discriminatory behaviour"; the disciplinary process is managed in accordance with the provisions of the law and the CCNL. Engineering works to guarantee a dignified and respectful working environment by avoiding any form of verbal abuse towards staff. The company periodically carries out corporate climate surveys.

**Working hours:** through a specific union agreement, a policy of flexible working hours has been defined with a margin of 75 minutes for entry and exit (8.15am-9.30am; 5.15pm-6.30pm) from the workplace (if in presence) or for connection/disconnection if remotely. Through the union agreement of 11 April, agile working and teleworking, if the requirements have been met, were extended to all offices. The CCNL for the private metalworking and plant installation industry provides for a maximum of 200 hours of overtime per person in one year. Furthermore, the same contract provides that the working hours cannot exceed 48 hours (the legal limit is 60 hours). There are specific procedures for the management of overtime and absences of any nature set up in compliance with current legislation.

**Remuneration:** the company undertakes to pay its employees a salary that complies with the CCNL and to conduct assessments to ensure that employees receive an appropriate remuneration that allows them to maintain an adequate standard of living, meeting their fundamental needs (living wage). There are specific procedures about the management of benefits, such as the company car and meal vouchers, variable components linked to the company's performance (such as, for example, MBO and performance bonus) and career development. Unpaid leave and solidarity holidays are permitted. The current supplementary company bargaining provides for more favorable treatments which are expressed both in the recognition of paid leaves for public and private medical visits, illness of daughters and sons, compulsory leave for the father and in the recognition of salary supplements such as, for example, for optional parental leave and reimbursement of expenses related to the education and schooling of employees' daughters and sons.

### 1.2.1 REPORTING MECHANISMS AND IMPLEMENTATION ACTIVITIES

Engineering has equipped itself with and participates in a system of rules and mechanisms to guarantee the parties affected by a human rights violation, measures to remedy the damage possibly caused by it.

In case of proven violations of human rights, immediate remedial measures must be put in place to prevent the continuation or repetition of the violation, as well as any further measure to sanction the violation itself and as a remedy for the individuals whose rights have been violated. .

To ensure that the company and all the stakeholders participate in respecting and improving the Social Attention System, Engineering has activated a communication method for the management of reports also relating to violation of Human Rights. Those who believe they have been victims of objectively incorrect or discriminatory behaviours, in addition to the ordinary legal actions provided for by the national collective agreement and by law, can send a communication to the Whistleblowing Committee according to the provisions of the Policy "Management of Whistleblowing Reports", even anonymous (whistleblowing) published on the company intranet.

The company's commitment to respecting human rights and adopting processes that result this commitment into culture and operational practices impose the following responsibilities on Engineering:

- **document** the Policy and ensure that it is implemented, understood, kept active, communicated internally and externally, ensuring that it is available to all the staff in an understandable form.



- **provide** all information and access to interested parties in compliance verification for respect of human rights.
- **guarantee** the continuous analysis and evaluation of the indications from stakeholders as a basis for an open and constructive dialogue to identify improvement objectives that are of mutual satisfaction.
- **establish** the Social Performance Team and define the organizational scheme that establishes its tasks and responsibilities. The responsibilities of the SPT are to:
  - conduct regular written risk assessments in order to identify and prioritize areas of actual or potential non-compliance with this Standard. Also recommend actions to address these risks.
  - ensure an effective monitoring on workplace activities for what concerns:
    - a) compliance with the SA8000 Standard <sup>1</sup>;
    - b) the implementation of actions aimed at effectively addressing the risks identified by the SPT.
  - facilitate periodic internal audits.
  - monitor progress with periodic meetings and identify potential actions to be taken in order to strengthen the System created.

This Policy will be disseminated to all interested social parties through this document, on the institutional website, on the company intranet.

This Policy integrates with the other company policies of Quality, Safety and Environment and Policy for Gender Equality.

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<sup>1</sup>Below are the references of the certification bodies:

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