

PROCESS:

LEADING AND DEVELOPING A SUSTAINABLE AND RESPONSIBLE COMPANY

SOCIAL ACCOUNTABILITY POLICY

SA8000 STANDARD

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SCOPO:

Artelia Italia decided to adopt a Social Accountability management system in accordance with the international SA8000:2014 standard, and this policy outlines its general principles.

The Top Management of Artelia Italia S.p.A. is committed to operating in alignment with the principles of the SA8000:2014 standard, adopting transparent methods and systems to identify and meet the expectations of key stakeholders, including customers, suppliers, and employees. This commitment translates into a structured approach aimed at ensuring respect for workers' rights and the implementation of ethical and responsible business practices.

The consistency of the Social Responsibility Policy with the company's strategies is carefully monitored by Management, which conducts periodic reviews to assess its alignment with the organization's objectives and ongoing activities. This evaluation process ensures that the adopted policy remains in line with the needs and developments of the company and the context in which it operates.

Furthermore, the adequacy of the Social Responsibility Management System can be certified by external and impartial bodies, which verify compliance with the requirements of the international SA8000:2014 standard. Certification by these external bodies ensures that the company concretely and verifiably meets the standard's requirements, guaranteeing that social responsibility is integrated at both strategic and operational levels within the organization.

This approach ensures transparency and continuous commitment in the implementation of socially responsible business practices, benefiting all involved stakeholders.

Artelia Italia's Management has therefore formally assumed responsibility for the following commitments:

- comply with national, EU, and international laws on labor and workers' rights, adhering to the provisions contained in official documents and their interpretations;
- maintain over time the requirements of social responsibility and align with any new requirements that may arise;
- ensure periodic monitoring and continuous improvement of the implemented management system by defining specific improvement objectives and verifying their achievement, including through a set of relevant indicators;
- provide all personnel with adequate training and information on ethics and social accountability;
- raise suppliers' awareness of the social responsibility principles outlined in the SA8000:2014 standard;
- carry out first-party audits to verify compliance with social requirements, and subsequently adopt all necessary corrective and preventive actions;
- document and communicate to stakeholders the company's commitment to Social Accountability.

The SA8000:2014 Senior Management Representatives, the Operational Manager of the SA8000:2014 Management System, and the Workers' Representatives for SA8000:2014 have been appointed.

The Social Performance Team has been established as the body responsible for monitoring the application of the SA8000:2014 Management System; however, overall responsibility for compliance with the standard remains with Senior Management.

The Norm		Artelia Italia's engagement
1.Child Labour	It is not permitted to use, or to support the use of, child labour; procedures must be established for the remediation of any children who may have been employed, providing in particular the necessary support to enable them to attend school; procedures must also be established to promote school attendance in all cases; situations that may expose children to risk must be avoided.	Procedures have been established and implemented to ensure that: <ul style="list-style-type: none"> • no employee under the age of 16 is hired; • awareness of the company's ethical policy is disseminated both to workers and stakeholders; • monitoring of our suppliers is carried out to avoid complicity in the exploitation of child labour.

<p>2. Forced labour</p>	<p>It is not permitted to use, or to support the use of, forced and compulsory labour; in particular, at the start of employment no deposits may be requested.</p>	<p>We do not, under any circumstances, require employees to provide monetary deposits or original identity documents. We do not use cameras or surveillance systems that monitor workers while performing their tasks. We reject any form of coercion toward personnel. Workers have the right to leave the workplace at the end of the standard workday, or immediately in case of imminent danger, and to freely terminate their employment relationship by giving reasonable notice.</p>
<p>3. Health & Safety</p>	<p>It is necessary to ensure that the workplace is healthy and safe; a management representative for safety and prevention must be appointed; adequate training must be provided to all personnel; potential health risks must be identified and addressed.</p>	<p>Ensuring workplace health and safety is our duty; therefore:</p> <ul style="list-style-type: none"> • we have complied with the obligations established by occupational health and safety regulations; • we have appointed the Head of the Prevention and Protection Service (RSPP); • we guarantee workers the possibility to elect their Workers' Safety Representative (RLS); • we have arranged for the distribution of informational materials to newly hired personnel; • we provide periodic training on health and safety to all employees and supply informational materials, or request proof of training received; • we have provided and continue to provide all workers with personal protective equipment free of charge; • we have appointed First Aid Responders; • we have appointed Fire Prevention Officers; • we maintain contractual relationships with qualified companies for maintenance activities; • personnel have the right to move away from any serious and imminent danger without having to request permission from the organization.
<p>4. Freedom of Association and the Right to Collective Bargaining</p>	<p>Workers have the right to join and form trade unions of their own choosing; they have the right to collective bargaining; workers' representatives must not be discriminated against in the workplace and must be able to communicate with their members; where freedom of association and collective bargaining rights are restricted by law, these rights must be facilitated through alternative means.</p>	<p>We guarantee all workers:</p> <ul style="list-style-type: none"> • respect for trade union rights; • the prevention of any form of discrimination against trade union members or representatives.

5.Discrimination	No form of discrimination may be carried out on the basis of race, social class, national origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, trade union membership, political opinions, age, or any other condition that could lead to discrimination; behaviours—including gestures, language, and physical contact—that are threatening, abusive, exploitative, or sexually coercive are not permitted.	Personnel hiring is carried out on the basis of competence, experience, and education, following the procedures already established in SMART and Local Smart management systems. Salaries are calculated according to the duties performed in compliance with the applicable National Collective Labour Agreement (CCNL), and, in the case of collaborators, in accordance with the existing procedure governing collaboration contracts. Training and instruction are guaranteed to everyone; career advancements are based on the individual worker's abilities and on the organization's operational needs. Dismissals are carried out only in cases permitted by law.
6.Disciplinary Procedures	Corporal punishment, mental or physical coercion, and verbal abuse of personnel must not be used or tolerated.	We reject all disciplinary practices that are not provided for by the National Collective Labour Agreement (CCNL) and by the Workers' Statute. When unavoidable, we limit ourselves to applying disciplinary measures as established by the CCNL or by the private professional engagement agreement, in order to maintain proper standards of conduct toward clients, colleagues, and management.
7.Working Hours	Working hours must comply with applicable laws and with the standards of the relevant sector; if national legislation is less restrictive than the SA8000 requirement, regular working hours must not exceed 40 hours per week with one day of rest; overtime must not exceed 12 hours per week, must be voluntary, and must be paid at a higher rate; where collective bargaining agreements apply, the request for overtime must comply with the terms of those agreements.	We apply, for employees, the working hours established by the National Collective Labour Agreement (CCNL): <ul style="list-style-type: none"> • we pay overtime work hours at an increased rate, as required by the applicable CCNL; • we guarantee rest days.
8.Salary	Minimum legal wages must be guaranteed; wages must meet basic needs and allow for some discretionary income; payslips must be clearly and regularly itemized; remuneration must be provided according to legal requirements and in the manner most convenient for the worker; false apprenticeship schemes or any similar arrangements that do not allow proper contribution regularization for the worker must not be applied.	We guarantee employees remuneration be at least in line with the applicable National Collective Labour Agreement (CCNL). We ensure, for collaborators, the commitment to provide fair and adequate daily compensation. We regularly issue payslips with a detailed breakdown of all salary components. We guarantee the proper management of all contractual forms used (fixed-term contracts, apprenticeships, project-based contracts).
9.Management System	To ensure compliance with the standard, it is necessary to implement a Management System consisting of Policies, Procedures, and Records.	The SA8000:2014 Management System is accessible to all Artelia Italia personnel through Local SMART intranet.

This Social Accountability Policy has been drafted in compliance not only with the applicable Reference Standard, but also with all Artelia Group and Artelia Italia policies and codes relating to ethics and social responsibility. The list below is illustrative and not exhaustive:

- **Code of Ethics;**
- **Modello 231;**
- **Group Policy & Governance On Ethics & Compliance;**
- **Group CSR Policy;**
- **Group H&S Policy;**
- **Group Environmental Policy;**
- **Group’s Employee Policy;**
- **Group Risk Policy;**
- **Politica della Parità di Genere Artelia Italia UNI PdR 125:2022.**

The SA8000 Policy and Standard are displayed clearly and visibly, in an appropriate and understandable form, both in the workplace and on the company website.

Artelia Italia has established a dedicated channel for submitting reports concerning alleged or confirmed violations of the provisions of this Policy and the SA8000 Standard, and encourages its responsible use.

The channel is accessible from the company website: [Social Accountability Policy and Claims Standard SA8000 | Artelia Italia](#)

- Anonymously via SA8000:2014 [Complaints Anonymous Channel](#)

- Non-anonymously: spt-sa8000-italy@arteliagroup.com

It is also possible to submit reports to the Certification Body and to the Accreditation Body for SA8000, whose contact details are provided below.

<p>References for the SA8000 Standard</p>	<p>Certification Body: DNV Business Assurance Italy s.r.l. - Via Energy Park, 14 - 20871 Vimercate Tel.: +39 (0)39 6899905 – e-mail: feedback.Italia@dnv.com</p> <p>Accreditation Body: SAAS – Social Accountability Accreditation Services - 9 East 37th Street, 10th Floor New York, NY 10016 Telefono: +1 (212)-391-2106 E-mail: saas@saasaccreditation.org</p>
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Artelia Italia is committed to handling every report received—through its channels mentioned above—with confidentiality, discretion, and without any form of retaliation, without prejudice to legal obligations.

Anyone who submits a report in good faith, without malicious intent, will not be subject to disciplinary sanctions nor to discriminatory or retaliatory behavior. This protection also applies in cases where the information provided proves to be inaccurate or does not lead to further action being taken.

Should the facts reported be confirmed through investigation, Artelia Italia will manage such reports by applying the necessary corrective measures.