

SA 8000 - SOCIAL RESPONSIBILITY POLICY

Progold S.p.A., aware of the importance of social responsibility in the global context, is committed to integrating the principles of **SA8000** into its management system, recognizing the value of people, the protection of human rights, and the promotion of an ethical and safe working environment.

Our social responsibility is based on principles of transparency, inclusion, and continuous improvement, understanding that sustainable economic growth can only exist in a context of social equity, respect for diversity, and environmental protection.

Progold S.p.A. recognizes that value creation comes through respecting people and actively engaging with the communities and stakeholders with whom it operates, going beyond mere compliance with laws and adopting virtuous and responsible practices throughout the supply chain.

PROGOLD S.P.A. COMMITMENTS

Progold S.p.A. is committed to:

1. Prohibition of Child Labor

Preventing and prohibiting any form of child labor, promoting compulsory education, and supporting pathways for personal and professional growth for young people.

2. Prohibition of Forced and Coercive Labor

Rejecting any form of forced, bonded, or coerced labor, including those arising from debt or physical or psychological coercion.

3. Health and Safety at Work

Ensuring a safe and healthy working environment, compliant with current regulations, promoting a culture of prevention through training, awareness, and active involvement of all employees.

4. Freedom of Association and Collective Bargaining

Respecting and promoting employees' rights to form and join trade unions and engage in collective bargaining without discrimination or retaliation.

5. Prohibition of Discrimination

Ensuring equal opportunities and prohibiting discrimination at any stage of employment based on:

- o Gender, sexual orientation, gender identity
- o Ethnic, national, or social origin
- Religion or personal beliefs
- Political opinions or other views
- Disability or physical condition
- o Age or marital status
- Any other personal or social condition.











6. Respect and Dignity

Ensuring a workplace based on mutual respect, prohibiting any form of physical, verbal, sexual, or psychological abuse, as well as any intimidating or humiliating behavior

7. Fair Working Conditions and Remuneration

Ensuring dignified working conditions and fair compensation, in accordance with the CCNL and company supplementary agreements, ensuring transparency in the composition of wages and in career advancement criteria.

8. Working Hours

Respecting working hours as provided for by national legislation and collective bargaining agreements, clearly regulating any overtime and breaks.

9. Management System and Continuous Improvement

Implementing a management system that complies with SA8000 requirements, promoting active participation of workers through the creation and continuous updating of the **Social Performance Team**. This team will be responsible for monitoring, reporting, and promoting continuous improvement in social responsibility practices.

10. Stakeholder Engagement

Raising awareness and engaging suppliers, subcontractors, and business partners, requiring adherence to SA8000 principles, and promoting regular audits along the supply chain.

11. Transparency and Communication

Disseminating this policy at all company levels and to external stakeholders, ensuring understanding, accessibility, and periodic review to ensure its continued relevance.

LEGAL REFERENCES

Progold S.p.A. guarantees adherence not only to SA8000 but also to the following international instruments and conventions:

- Universal Declaration of Human Rights
- ILO Conventions (International Labour Organization)
- UN Convention on the Rights of the Child
- UN Convention on the Elimination of All Forms of Discrimination against Women
- UN Convention on the Elimination of All Forms of Racial Discrimination
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social, and Cultural Rights
- ILO Code of Practice on HIV/AIDS and the World of Work











REPORTING AND COMMUNICATION CHANNELS

Progold S.p.A. provides the following reporting channels for any violations or suggestions related to social responsibility:

SAI - Social Accountability International

Headquarters: 9 East 37th Street, 10th Floor, New York, NY 10016, United States

Email: <u>info@sa-intl.org</u> Phone: +1 (212) 684-1414

Social Accountability Accreditation Services (SAAS)

Email: saas@saasaccreditation.org

Phone: +1 (212)-391-2106

TÜV Italia

Viale Fulvio Testi, 280/6, 20126 Milano, Italy

Email: tuv.ms@tuvsud.com

Phone: +39 02 24130

TÜV Italia Reporting System

• Progold S.p.A. - Internal Reporting Channel

For anonymous and secure reports regarding corporate social responsibility issues, the following online reporting channel is available:

Social Performance Team - Internal Reporting

Reports may be submitted anonymously, ensuring maximum confidentiality and protection against retaliation for the whistleblowers.

APPROVAL AND REVIEW

This policy is approved by the **CEO of Progold S.p.A.** and will be reviewed periodically to verify its effectiveness and relevance in light of evolving legal, business, and social developments.









