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SOCIAL ACCOUNTABILITY POLICY

This Policy is an integral part of the “Social Accountability Management System” (SAMS) implemented by the TIBERINA GROUP at its plants in accordance with the SA8000:2014 “Social Accountability” standard.

In keeping with its corporate mission, the TIBERINA GROUP General Management has decided to set up and implement a Social Accountability Management System as of 2009, in compliance with the SA8000 standard. The SAMS, which has progressively involved all the Group companies, has undergone its third renewal and is about to undergo its fourth in April 2023..

The General Management has confirmed the SAMS as a valuable tool for the human resources management involved in its production process, both as regards the respecting of working conditions and as a support for aspects regarding the health and safety of the personnel.

In addition, through the implementation of the System, the TIBERINA GROUP is gradually engaging its suppliers in compliance with the principles of Social Accountability.

The TIBERINA GROUP’s commitments to this Policy can be summarized as follows:

- compliance with the requirements of Social Accountability envisaged by the SA8000 and with the applicable national and local laws, international principles, ILO standards, and the requirements supported by the company;
- periodic review of the Policy in order to be able to initiate a process of continuous improvement, also taking into account changes in laws and in the company’s business requirements and in conduct;
- effective implementation and active maintenance of the Policy and its dissemination at all levels of the organization.

The TIBERINA GROUP’s guidelines for achieving these objectives are:

- The absolute prohibition (including among its suppliers) of the use of:
 - child labor;
 - forced and compulsory labor (including the trafficking of human beings).
- The guarantee to workers to be able to perform their jobs in a healthy and safe work environment;
- The protection of the right of workers to join trade unions and to collective bargaining;
- The refusal to use discriminatory behavior on the basis of individual diversity;
- The application of disciplinary practices provided for by law;
- The implementation of working hours, including overtime, on the basis of the applicable laws and national collective bargaining agreements;
- The guarantee of compliance with contract and company standards, which lead to the paying of a decent wage, higher than the parameters set by the Living Wage;

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- The maintaining and continuous monitoring of the degree of compliance of the system with the regulations, applicable laws and other requirements, managing deviations with adequate corrective actions;
- The application of the instruments available for the maintenance and safeguarding of the workplace;
- The continual providing of information to employees regarding company policy and Social Accountability requirements;
- The activation of communication channels and involvement with all Stakeholders on topics related to the SA8000 and its implementation status in the TIBERINA GROUP;
- The use of suppliers who comply with the principles set out in this policy and who apply them in the management of their own personnel and supply chain, monitoring their performance over time;
- The appointing of an SA8000 Management Representative and the presence of Workers' Representatives at each production site;
- The possibility of making reports, also in anonymous form, in the boxes installed for this purpose at each Plant, as well as to the following contacts:
 - TIBERINA SOLUTIONS, Zona Ind.le Madonna del Moro, 06019 Umbertide (PG) – email tiberina@tiberina.com – digital platform for anonymous reporting, so-called whistleblowing (ex d. lgs n. 24/2023) https://yourvoiceup.com/Tiberina_Solutions/segnala
 - C.I.S.E., Corso della Repubblica 5, 47100 Forlì - email info@lavoroetico.org
 - SAAS, 220 East 23rd Street, Suite 605, New York, New York 10010, USA - email: saas@saasaccreditation.org; Fax: +212-684-1515
- The implementation of procedures for managing any nonconformities, ensuring the prompt intervention of the company bodies, which, together with the workers' representatives, can evaluate the best countermeasures;
- The defining of goals for continuous improvement based on the principles set out in this document.

**The TIBERINA GROUP Management
O. Caldari**

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