

SA8000 Management System

Rev.7

Date of issue 06/04/2023

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Information Brochure SA8000:2014

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WHAT IS THE SA8000?



It is a voluntary certification that aims at improving the company and the overall improvement of working conditions.

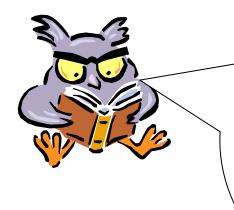
The TIBERINA GROUP General Management has decided to set up and implement a Social Accountability Management System, in compliance with the SA8000 standard, which has been progressively applied to all the companies in the GROUP.

$SA \Rightarrow SOCIAL ACCOUNTABILITY$

The SA8000 standard has the following characteristics:

- ✓ It is voluntary
- ✓ If defines the reference requirements for Social Accountability
- ✓ It is aimed at respecting the basic rights of workers
- ✓ It takes into consideration the laws of each country

The standard, which applies worldwide, has been drafted in collaboration with the world employment offices and human rights organizations.



WHAT DOES THE SA8000 SAY?

The standard is based on nine Social Accountability requirements, which are:

- 1. Child Labor
- 2. Forced and Compulsory Labor
- 3. Health and Safety
- 4. Freedom of Association and Right to Collective Bargaining
- 5. Discrimination
- 6. Disciplinary Practices
- 7. Working Hours
- 8. Remuneration
- 9. Management System



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1) Child Labor



The company must NOT use or support (through its suppliers) child labor (under age 16 in Italy).

Even if the company does not use child labor, it still has to implement policies and procedures (establish, document, maintain, communicate) for the remediation of working children, providing them with adequate support.

The company must not expose children and young workers (i.e. working age minors) to situations that are dangerous, risky or harmful to health, both inside and outside the workplace.

WHAT DOES TIBERINA DO TO PREVENT CHILD LABOR?

- At the time of recruitment, the personnel office examines identification documents to check the candidate's age (if the boy or girl is less than 16 years old, they cannot be hired)
- It trains employees regarding child labor
- It monitors suppliers (including employment agencies), performing on-site checks in the event of potential critical issues (including when reported by an interested party)
- If a child worker is found TIBERINA takes action to protect and remediate the child



On the notice board you will find the "Child Labor Protection" procedure, which describes the guidelines that TIBERINA uses for the prevention of child labor, the support and the remediation of employed child workers (including by suppliers)

The procedure is communicated to the interested parties (personnel, major suppliers, customers, local authorities and trade unions) so that everyone can monitor and report the presence of child labor inside and outside the Company



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2) Forced and Compulsory Labor

The company **must NOT use** or **support** (through its *suppliers*) forced or compulsory labor.

For example, it must NOT require personnel to deposit sums of money (with the exception of shares in cooperatives) or original copies of identification documents: personnel must not be "forced" to work through blackmail or other oppressive forms.

The employment relationship (as regards both rights and duties) must be carried out in accordance with the contractual agreements.



WHAT DOES TIBERINA DO TO PREVENT FORCED AND COMPULSORY LABOR?

- At the time of recruitment, the employee signs and receives a copy of the letter of appointment, which contains all the elements provided for by the contract (e.g. level, job, collective bargaining agreement, workplace, remuneration, etc.), including the terms for the termination of the employment relationship
- It watches over to ensure that no one (including the employment agencies) can ask for fees or costs related to recruitment or withhold identification documents or sums of money
- It provides explanations regarding the pay envelope if it is not clear
- It trains employees regarding the various forms of forced and compulsory labor
- It does not make use of or support (even indirectly through its suppliers) the trafficking of human beings



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3) Health and Safety



The company must GUARANTEE that work activities are carried out in a safe and healthy environment.

It must therefore comply with the applicable laws and implement policies for preventing accidents and damage to health, so as to reduce the possibility of risks.

The company must train personnel on safety.

WHAT DOES TIBERINA DO TO GUARANTEE HEALTH AND SAFETY?

- It analyzes the risks present in the Company and describes the measures to reduce such risks in the Risk Assessment Document (RAD)
- It adopts the necessary measures for fire prevention, the evacuation of work areas, and in case of serious and immediate danger
- It provides employees with personal protective equipment (PPE)
- It appoints the company physician and provides for medical examinations for the employees, at the intervals established by the company physician
- It appoints the Head of the Prevention and Protection Service and appoints the persons in charge
 of and workers assigned to emergencies and fire prevention, ensuring that they are adequately
 trained
- It trains the employees regarding safety
- It carries out periodic emergencies drills involving all personnel present at the company
- It provides first aid boxes in the work areas
- It keeps written records of all accidents occurring and communicates them to the competent authorities
- In the event of an accident, it provides first aid and assists the worker while waiting for appropriate medical treatment



SAFETY in the company is important, and it starts with you

- Wear Personal Protective Equipment it is for YOUR protection
- Take an active part in TRAINING
- Use CONDUCT that ensures your own and your co-workers' safety
- REPORT anything that is wrong to the Workers' Representative
- Make suggestions for IMPROVEMENT



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4) Freedom of Association and Right to Collective Bargaining

The company **must respect** the *right of employees* to join or form a *trade union* and the right to collective bargaining, thereby guaranteeing the possibility of holding union meetings, electing their own representatives, etc., as established by the applicable laws.

The company must not interfere in the union choices made by its employees, guaranteeing the non-discrimination of trade union representatives and of the members of the trade unions.



WHAT DOES TIBERINA DO TO GUARANTEE THE FREEDOM OF ASSOCIATION?

- It ensures that the company's employees are free to join trade unions of their choice
- Membership in the Trade Union is clearly illustrated in the pay envelope
- Workers voluntarily and freely elect their Representations
- Trade union representatives are free to communicate with all employees
- Trade union meetings are free and take place in rooms provided by the company, during working hours, in accordance with the procedures established by the current laws in force
- If the hours of the participants in unions meetings take place during working hours, they are paid in accordance with the law, as are the hours of Trade Representatives on leave for union purposes
- There are union notice boards at the company for the free posting of union documents
- The Company does not discriminate against trade union representatives or members of trade unions



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5) Discrimination

The company must NOT discriminate or promote discrimination in the various stages of the working life, on the basis of:

- ✓ Race Class Nationality Territorial or Social origin
- ✓ Religion
- ✓ Disability
- √ Gender
- ✓ Marital status
- ✓ Sexual orientation
- ✓ Union membership
- ✓ Political opinions and/or personal beliefs

The company must not allow CONDUCT, including gestures, language, and physical contact, which are sexually coercive, threatening, offensive or exploitative.



WHAT DOES TIBERINA DO TO PREVENT DISCRIMINATION?

- The search for personnel is conducted without discrimination and respecting equal opportunities
- Selection interviews are conducted in accordance with the dignity and integrity of the person, without prejudice or pressure, without using instruments aimed investigating the thinking or status of the candidate
- Job offers, job advertisements and all materials used during training and communication are not discriminatory
- It watches out so that no discriminatory behavior occurs
- All employees are guaranteed the opportunity to submit complaints and suggestions for improvement



The TIBERINA GROUP extends its policy of non-discrimination against personnel to employment agencies and ensures that temporary employees are guaranteed the rights and remuneration to which they are entitled, as well as all the elements of health and safety



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6) Disciplinary Practices



The company must NOT carry out or promote disciplinary practices that are contrary to the law and, more specifically, it must not resort to corporal punishment, mental or physical violence, or verbal abuse.

It must also ensure that all Disciplinary Practices are managed and applied according to that established by law.

WHAT DOES TIBERINA DO TO GUARANTEE THE CORRECT MANAGEMENT OF DISCIPLINARY PRACTICES?

- All disciplinary measures are based on factual data, and the worker's right to defend himself or herself and/or to be assisted by a trade union of his or her choice is guaranteed
- The case histories, the times and the relative disciplinary measures are contained in the industry Metalworkers' Collective Bargaining Agreement (CBA): disciplinary measures are applied in the event that the employees do not comply with the rules of the CBA and with that provided for by law
- With the exception of verbal reprimands, disciplinary measures are communicated and applied in writing (by registered letter or by hand) both at the time of the disciplinary dispute, which could result in the sanction, and in the assignment of the sanction itself



You will find the articles of the Metalworkers' Agreement with disciplinary sanctions on the union notice boards



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7) Working Hours

The company MUST comply with the laws in force and with industry standards (CBA) on working hours.

The company MUST ensure that overtime work:

- ✓ Does not exceed what is provided for by applicable law and/or the CBA (when the limit is more restrictive)
- ✓ Be remunerated more than normal hours



WHAT DOES TIBERINA DO FOR THE MANAGEMENT OF WORKING HOURS?

- Working hours are recorded by badges
- The worker wishing to take leave and vacation/holidays makes a written request to the Plant Manager and/or Functional Manager, by filling out pre-prepared forms
- In case of absences due to illness or accident, the employee must provide the company with a medical certificate
- The secretarial staff and the personnel office are at the disposal of the employees to provide all the information regarding working hours, the pay envelope, and any interpretations of the employment contract

8) Remuneration



The company MUST quarantee:

- ✓ Wages complying with minimum wage or industry standards (as according to the reference CBA)
- ✓ Clear and regularly explained pay envelopes

WHAT DOES TIBERINA DO TO GUARANTEE REMUNERATION IN COMPLIANCE WITH THE COLLECTIVE BARGAINING AGREEMENT?

- Working hours and overtime work, as well as nighttime, Sunday, holiday and shift work, are clearly indicated in the pay envelope, and the increased pay rates are provided for in the metalworkers' contract
- The pay envelope is regularly delivered to employees on a monthly basis



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9) Management System

The company has implemented a Social Accountability Management System that allows it to manage systematically all the requirements of the standard.

TIBERINA has enshrined its Corporate Social Responsibility policy in a document in which it has established the guidelines to be followed to ensure compliance with the SA8000 standard.

Every year a Social Report is carried out which reports the progress of all the Social Responsibility requirements and the main objectives, in order to share this information with all the Interested Parties.

Audits are carried out each year in the areas of personnel management, safety and the management system, in order to monitor the progress of SA8000 and undertake any improvement actions.



On the company notice boards you will find the SA8000 Policy and the Social Report

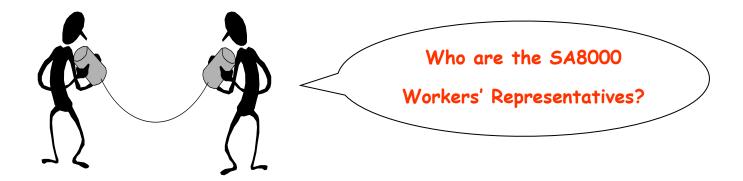
In addition, the company must ensure that its **suppliers** also comply with the Social Accountability principles (including on-site audits and/or specific documentation requests), and it must **communicate** to the interested parties (personnel, customers, suppliers, the local community, institutions, etc.) the data and other information regarding the results of management reviews and monitoring activities.



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SA8000 Workers' Representatives



There may be one or more SA8000 Workers' Representatives present in each Company.

- ✓ At unionized sites, the SA8000 Representative must be a member of the union, if the union chooses to cover this role
- ✓ If unions do not appoint a Representative or if the organization is not unionized, workers can freely elect their own Representative for this purpose

The SA8000 Worker' Representative (SAWR) has the task of:

- √ taking up any personnel problems or issues that have not been resolved through the
 appropriate channels (e.g. department head, plant manager, personnel office, etc.)
 and/or suggestions for improvement;
- √ facilitate relations with Management in matters related to the company's Social Accountability
- ✓ taking part in the Social Performance Team



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The SAWR must not be considered a substitute for the Union Representative

Management has appointed its own representative for the SA8000 (Maurizio Casavecchia)



The SA8000 Management
Representative and the Workers'
Representative **meet** periodically to
resolve any problems that have arisen.

Social Performance Team (SPT)

In each company there is a **Social Performance Team** consisting of:

- a) SA8000 workers' representative(s)
- b) management



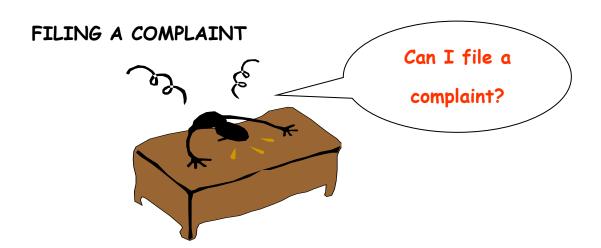
What does this team do?

- ✓ It identifies and evaluates the SA8000 risks concerning all the requirements set out in this brochure (child labor, forced and compulsory labor, health and safety, freedom of association, discrimination, disciplinary practices, working hours, remuneration, management system)
- ✓ It suggests to Management actions for dealing with the risks identified, based on the severity of the risks
- ✓ It monitors the performance of the SA8000 and the improvement actions undertaken



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All Personnel and Concerned Parties can report (also anonymously) any problems or issues (e.g. violation of their rights and/or conditions contrary to Social Accountability that could not be previously solved by communicating with the Company's representatives) and provide suggestions for improvement, in the following ways:

- ✓ Interfacing directly with the Plant Manager (PLM) and/or with their Function Manager
- ✓ Interfacing directly with the SA8000 Workers' Representative (RLSA)
- ✓ By reporting a complaint in the complaint box (checked by the SA8000 Workers'
 Representative who has the keys, in the presence of the PLM, or by another person in
 charge. At Tiberina Solutions the complaint box is checked by the RSLA in the presence
 of HR).
- ✓ By reporting it to:
 - TIBERINA SOLUTIONS, Zona Ind.le Madonna del Moro, 06019 Umbertide (PG)
 e.mail tiberina@tiberina.com;
 - Ente di Certificazione C.I.S.E., Corso della Repubblica 5, 47100 Forlì email: info
 lavoroetico.org (in this case it is advisable to include the complaint in the company box as well, so that the problem can be made known and managed)
 - SAAS, 220 East 23rd Street, Suite 605, New York, New York 10010, USA email: saas@saasaccreditation.org; Fax: + 212-684-1515



In order to create a cooperative and proactive business climate, it is suggested that you first to try to solve any problems that have arisen by discussing it peacefully and constructively with the appropriate company functional managers



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APPENDIX - Receipt of Brochure

The undersigned				
employee of				
Haraba Paulana				
Hereby Declares				
to have received on this date the "SA8000 Management System" information brochure.				
Date	Acknowledgement of Receipt The Employee			