

SOCIAL RESPONSIBILITY POLICY

Rebaioli S.p.A., with its decades-long presence on the market and awareness of its role and responsibilities within the social and economic community, also wants to stand out for its commitment to Social Responsibility built on two fundamental cornerstones based on the following basic principles: the quest for the improvement of the working conditions of people and respect for their dignity and freedom.

This commitment translates into considering:

- its Employees as a strategic resource, guaranteeing respect for their rights and promoting their professional and personal development;
- its Suppliers as partners, not only for achieving corporate activities but also in regards to Social Responsibility;
- its Customers as an essential part of the Company's success, working for their satisfaction including in the context of Social Responsibility;
- dialogue with stakeholders as a component that contributes to the consolidation of a culture that respects the rights and dignity of all workers.

To achieve this goal, Rebaioli S.p.A., which is already certified in compliance with the UNI EN ISO 9001, BS OHSAS 18001, UNI EN ISO 14001 and UNI CEI ISO 50001 standards, has decided to obtain certification of its Social Responsibility management system compliant with the SA8000 standard.

In order to obtain certification of the Social Responsibility management system, top management has formally taken on responsibility for the following commitments:

- ✓ complying with all the SA8000 standard requirements;
- ✓ complying with national, EU and international laws on labour and workers' rights, complying with the provisions contained in the official documents and their interpretations referred to in the SA8000 standard;
- ✓ implementing, carrying out and maintaining social responsibility requirements over time and adapting to any new relevant requirements;
- ✓ guaranteeing the revision of the present document, the periodic monitoring and the continuous improvement of the management system, constantly taking into account any legislative changes and all the requirements of Rebaioli S.p.A. and defining, within the framework of appropriate periodic meetings, specific improvement objectives and monitoring progress over time;
- ✓ ensuring that all staff receive adequate training and information about ethics and social responsibility;
- ✓ participating in discussions with all stakeholders in order to achieve sustainable compliance with SA8000;
- ✓ making suppliers aware of the principles of social responsibility starting with the sharing of values at the foundations of the certification project, as it is a strong desire of the Company that the principles adopted by it be respected by all suppliers involved in the products/services supply chain subject to its business;
- ✓ carrying out internal and external audits aimed at ascertaining compliance with the social requirements, then adopting any improvement actions deemed necessary;
- ✓ documenting and communicating the commitment to Corporate Social Responsibility to stakeholders.

With regard to the specific social requirements envisaged by SA8000, the position taken by Rebaioli S.p.A. is specified below:

CHILD LABOUR

The Company has not availed itself in the past nor the present, and will not in the future, make use of child labour, nor does it encourage or put into action, with respect to its partners, actions that would lead them to adopt such practices. Should this occur, rescue interventions will take place on the children and young workers involved. It should be noted that, for some time now, in the selection of employment candidates, a valid identity document is required to check that the potential employee is over eighteen years of age. The only exception is the admission of non-adult students for internships at our offices (only for clerical and non-operational worksite activities) in accordance with work/school programs organised by various educational institutions, in compliance with the agreements established by the schools with businesses that host the students.

To manage these SA8000 requirements the Company has implemented procedures to prevent the use of, or support of, child labour not only internally but also with its partners (P21S, P04P). There are therefore no children in the Company, and in the recruitment process checks are made to ensure that the accepted documents are not false or counterfeited and are filed to demonstrate the age of individual workers.

FORCED AND COMPULSORY LABOUR

Rebaioli S.p.A. regulates relations with staff through current legislation. At the beginning of employment no deposit is required and no actions are taken towards its suppliers to induce others to adopt such practices. The Curriculum Vitae received are all treated in compliance with privacy regulations. No portion of the salary, benefits, assets or documents in force belonging to staff is retained in any way to force them to work for the company. The Company undertakes to not be involved in supporting the trafficking in human beings and not engage in work relationships with any other business that does not respect this principle.

In this case too, Rebaioli S.p.A., in order to keep a check on this issue linked to the blatant violation of workers' rights, ensures that all overtime hours are voluntary and no coercion of any type is employed, and to do this appropriate procedures have been implemented (P21S, P04P). These procedures prevent the imposition of particular restrictions on the freedom of movement of staff, both from the point of view of the use of breaks for physiological, therapeutic or religious needs and with regard to the application of the safety measures envisaged for the various tasks entrusted to workers.

HEALTH AND SAFETY

Rebaioli S.p.A. considers workers' health and safety as a fundamental value, and training and information on this issue as a priority. It therefore guarantees, through the RSPP (Health and Safety Officer), a safe and healthy workplace for all workers and adopts all the necessary measures to prevent accidents and damage to health that may occur in the course of work or as a result of it, minimising the causes of danger attributable to the work environment. The Company has a training program on health and safety that is provided to new employees, in the event of accidents, and periodically to all staff. With regard to compliance with current health and safety legislation, the Company has adopted a Risk Assessment Document, has organised the Prevention and Protection Service and urges the Workers' Health and Safety Representative to report any possible risk situation and intervening as quickly as possible to improve health and safety in the company.

In particular, in order to manage workplace health and safety, in addition to complying with current legislation, Rebaioli S.p.A. has implemented and certified a management system in compliance with international standard BS OHSAS 18001. Within the Company there is a Health and Safety Committee to monitor health and safety management, which ensures that the level of health and safety never decreases. For example, worker training regarding risks, PPE and emergency procedures is monitored; finally, health surveillance enables the monitoring of workers' health and to receive valuable suggestions regarding best management of workplace health and safety.

FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

In compliance with laws and regulations in force, the Company does not obstruct membership of trade unions. Workers independently choose if and to which trade union to join; since it is sensitive information, union membership is treated in accordance with privacy directives. Furthermore, the Company guarantees that membership of any trade union does not entail any discrimination or retaliation and the availability and use of appropriate means and rooms to communicate with workers.

As demonstration that at Rebaioli S.p.A. anyone has freedom of association and the right to collective bargaining, our Company has distributed a brochure (Info SA8000) among all the workers which describes the tasks and the usefulness of trade unions for representing workers in the workplace. The Company does not in any way preclude membership of any type of trade union and does not obstruct workers from managing their freedom of association and their right to collective bargaining in an absolutely voluntary manner.

DISCRIMINATION

Rebaioli S.p.A. recruits staff exclusively on the basis of criteria of the company's need (type of professional positions required) and of the candidate's compliance with them. Career paths are structured with the aim of using as best as possible the professional qualities of the employee and taking into account their merits. For the purposes of professional classification or economic and career development, considerations relating to any condition that could lead to discrimination are not used. Therefore, the company:

- ✓ in hiring, retribution, access to training, promotion, dismissal or retirement does not discriminate on the basis on race, nationality or social origin, class, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political affiliation and opinion, age, or any other condition that could give rise to discrimination;
- ✓ does not interfere with the exercise of the right of staff to follow principles, practices, or to satisfy needs related to race, nationality or social origin, religion, disability, sex, sexual orientation, family responsibility, union membership, political opinion or any other condition that could give rise to discrimination;
- ✓ does not allow behaviour, including gestures, language or physical contact, that are sexually coercive, threatening, offensive or aimed at exploitation;

- ✓ does not allow any other form of discrimination.

Relationships between workers based on mutual respect are encouraged.

To manage this issue in the best way, Rebaioli S.p.A. has implemented appropriate procedures that provide for the documentation of any discriminatory events so that they are then analysed and discussed to determine the best intervention. Any job advertisements and subsequent interviews are not based on any type of discrimination, but only provide for the willingness to learn, personal skills and competences, as well as the adequacy to perform the job, are an instrument of choice for the various candidates taken into consideration.

DISCIPLINARY PROCEEDINGS

Rebaioli S.p.A. treats all staff with dignity and respect and in compliance with current legislation;; it does not use or encourage the use of corporal punishment, mental or physical coercion and verbal abuse. The Company only permits disciplinary practices required by current legislation, resulting from gross negligence or wilful misconduct. In interpersonal relationships, particularly in hierarchical relationships, abusive attitudes are not allowed.

When it considers it absolutely necessary, Rebaioli S.p.A. applies disciplinary sanctions as per applicable national contracts (National collective labour agreement 5 December 2012 for workers employed in the private metalworking industry and installation of plants with renewal of 26.11.2016; the National collective labour agreement for employees of construction companies and similar companies on 19 April 2010). When an event occurs that requires disciplinary action against a worker, the Company maintains adequate recordings to document everything that happened so that both the Company and the worker are constantly safeguarded, that is, both stakeholders are aware of the proceedings in progress. In this way, workers are constantly aware of the actions taken and their consequences and that the whole proceeding is documented and archived.

WORKING HOURS

Rebaioli S.p.A. adopts working hours as established by the applicable agreements (CCNL Metalmeccanici and CCNL Edilizia), and ensures that working hours and the regulation of holidays and overtime are in compliance with current legislation, national labour contracts, second level bargaining agreements and agreements at the national and regional trade union level.

The workers know, as per their agreement, the nature and duration expected for ordinary working hours and situations that may require additional hours of work. The presence of workers at the Company's premises is established by stamping time cards. Whereas on construction sites the construction site managers record the presence of workers. All working hours are recorded and kept for any future disputes. In any event, overtime does not exceed what is required by current legislation and shifts during holidays or pre-holidays are interspersed with special days of recovery as per current legislation.

REMUNERATION

Rebaioli S.p.A. guarantees that the remuneration and allowances of employees are in compliance with current legislation, national labour contracts (National Collective Labour Agreement of 5 December 2012 for workers employed in the private metalworking industry and installation of equipment with renewal of 26.11.2016, National collective labour agreement for employees of construction companies and similar companies of 19 April 2010), agreements at the national and local trade union level and in any event in line with market standards. At the time of recruitment, the Company attributes a qualification corresponding to a salary position to each worker. Remuneration is paid both by quantity and by manner and time of delivery on a regular basis. Additional services are paid to the extent established by the contract. Surcharges for holiday and night work are calculated on a regular basis.

The Company guarantees the payment of salary according to current legislation including overtime and work on holidays or pre-holidays; moreover, a bonus system (P21S) has been developed based on the goodwill and commitment shown by the workers so that the extra effort of workers correspond to a fair bonus in recognition of the greater commitment to work.

MANAGEMENT SYSTEM

To ensure that the company continues to meet the requirements of the SA8000 International Standard, including with third parties, Rebaioli S.p.A. has implemented a Social Responsibility Management System integrated into the pre-existing Quality, Environment, Health and Safety and Energy Management System. In this way, procedures, guidelines and records have been established that allow the Social Performance Team to monitor the company situation regarding all the requirements of the Standard, checking that the System continues to comply with these requirements, but also that the System is appropriate and effective in combating all forms of exploitation or mitigation of all worker rights of both the Company and the various business partners. This Management System is based on a Company Policy that establishes the Company's guidelines, in particular with regards to Social Responsibility; a Social Performance Team has been elected that operates according to a precise regulation to ensure that the level of respect for workers' rights is

continuously improved. As a starting point, the SPT has implemented a procedure for the assessment of specific risks related to social responsibility to take an initial snapshot of the situation that is then constantly monitored in an appropriate manner and subject to continuous improvement. In order to obtain the best results, the SPT has made sure it has involved all the workers in order to receive suggestions and criticisms of the way in which Rebaioli S.p.A. deals with their rights by establishing, among other things, ways of reporting critical situations or complaints by:

- ordinary mail to: Rebaioli S.p.A. Via degli Artigiani, 30 – 25047 DARFO B.T. (BS);
- insertion of the RS02 form filled in the company mailbox;
- verbal communication to the Workers' Representative for Social Responsibility (RLRS) Tel. +39.345.2358375
- transmission of the RS02 module by fax to the number: +39.0364.531613;
- mail to: responsabilita.sociale@rebaioli.it
- direct sending via the link REPORT.

The RS02 Module can also be forwarded to the Certification Body: CISE* (Center for Innovation and Economic Development) – C.so della Repubblica, 5 – 47121 Forlì (FC) -Tel. +39 0543 38214 – Fax +39 0543 38219 – email: info@lavoroetico.it

The RS02 Module can also be forwarded to the Accreditation Body: SAAS (Social Accountability Accreditation Services) – 15 West 44th Street, 6th Floor, New York NY10036 Tel (212) 684 1414 Fax (212) 684 1515 – email: saas@saasaccreditation.org

All the reports are then collected and analysed by the SPT which, if necessary, will evaluate suggestions for improvement or actual corrective actions regarding the report sent.

Through the Management System procedures, all the stakeholders are involved in varying degrees in the management of Rebaioli S.p.A.'s social responsibility; in particular, the Company's Social Responsibility policy is disseminated so that all the partners are aware of the guidelines adopted by the Company regarding workers' rights. In particular, a greater commitment is requested by suppliers, which are the interested party on which the Company can intervene more effectively, in the area of the continuous improvement of workers' rights. To monitor this, there shall be regular audits at their premises to monitor any improvement margins

The Integrated Quality, Environment, Safety, Energy and Social Responsibility System is based on the achievement, maintenance and improvement of the requirements specified in the UNI EN ISO 9001: 2015, UNI EN ISO 14001: 2015, OHSAS 18001: 2007, UNI CEI standards EN ISO 50001: 2011 and SA 8000: 2014 standards with the Management's constant commitment.

Darfo Boario Terme (BS) 26/03/2018



REBAIOLISPA®
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*CISE (Certification Body) has created an online platform, called Participatory Monitoring SAW (Social Accountability Watch), which can take advantage of the active participation of the various stakeholders. Those who register on the platform will be considered as a monitor: they will be able to make reports, acquiring the right to receive a feed-back about the outcome of their report.