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To all

Enplyees, Free-lances,
Suppliers and Customers

Forlì, the 6th February 2025

Subject: Code of Conduct

SUMMARY

- Foreword
- Code of Conduct for Suppliers

FOREWORD

The SA8000 model lists the requirements for socially correct behaviour of organisations towards workers, in particular with regard to:

- child labour
- forced and compulsory labour
- health and safety conditions
- freedom of association
- discrimination
- disciplinary practices
- working hours
- remuneration

PROECO SRL has considered it right to comply with these standards, not only to give concrete evidence of its duty to respect the human rights of workers in all types of processes and organisations, but also to promote them with its partners.

The ultimate goal of this work is to stimulate a chain process of compliance with the standard by partners, suppliers and sub-suppliers, influencing their behaviour and increasing their ethical and social quality.

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Adopting the requirements of the SA 8000 standard leads to favouring companies that demonstrate, in addition to technical and management skills, their sensitivity to social issues, without generating additional burdens for the customer.

PROECO SRL operates in compliance with the principles on which the SA 8000 standard is based.

SUPPLIER CODE OF CONDUCT

This code of conduct, drawn up in accordance with PROECO SRL's internal procedures, is intended to imbue PROECO SRL's operations, behaviour, working methods and relations both within the supplier company and with external parties with fairness, loyalty, integrity and transparency. This document is a set of principles and rules whose observance by suppliers and their sub-suppliers is considered by PROECO SRL, to be of the utmost importance, constituting a decisive asset for the consolidation of relations between the organisation and individual suppliers. However, PROECO SRL adopts this document in order to improve relations with suppliers with a view to mutual benefit and considers it a formal addition to the contractual requirements with suppliers of goods and services, compliance with which will be a gradually necessary condition for maintaining and strengthening supply relations.

In particular, it will consider as evaluation criteria - compliance with this code of conduct. - the commitment to comply with it within an agreed time frame and according to the criticalities identified. With regard to the above, PROECO SRL undertakes to activate inspections on the most critical suppliers by sector or geographical area. Any clarifications may be requested from the QHSE Manager of PROECO SRL. By signing this Code of Conduct, PROECO SRL formally undertakes, in addition to complying with mandatory and current legislation, to:

Child labour	• Not to employ child labour in the production of any product or the provision of any service, where child labour is defined as the employment of persons under the age of 15 years who are unable to attend compulsory school and/or lead a life appropriate to their agè. • Guaranteeing young workers (young people under the age of 18) effective conditions for learning, growth and professional development, as well aś appropriate health and safety conditions and training in this regard • Showing evidence of a strong sensitivitỳto issues of child labour exploitation, social discrimination, marginalisation also with regard to their suppliers • Children who apply for work or who, in accordance with the foregoing, are to be dismissed, to be granted appropriate temporary financial support for the purpose of fulfilling their compulsory schooling the right of all children to be protected and to be provided with the basic conditions to enable them to lead an economically and socially dignified life must be protected	Relevant Conventions and Recommendations: Convention ILO 138 Convention ILO 182 Recommendation ILO 146

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Forced labour	• Do not under any circumstances ask staff to leave 'deposits' of money • Do not under any circumstances ask staff to leave original identity documents with the company • The company or any other entity that provides labour to the company shall not withhold any part of the personnel's salary, benefits (allowances), property or documents used for the purpose of forcing the said personnel to continue working for the company • Allow staff the right to leave the workplace at the completion of the standard working day, and make them free to terminate their employment contract, informing the employer in reasonable time • Neither the company nor any other entity providing work for the company should be involved in or give support to human trafficking • Do not force workers to take on debts with the company and if a worker applies for a loan, the conditions applied are the same or better than market conditions • Ensuring payment for any training programmes followed by workers and indispensable to the work being performed • Guarantee the payment of salaries, with payment methods that do not deprive workers of their right to termination of employment, on time • Ensuring the absence of security guards or military personnel at the facility • Allow workers' family members to freely visit PROECO SRL offices • Ensuring the presence of adequate labour contracts signed by workers • Ensuring the willingness to provide explanations to employees concerning items that are not particularly clear (see previous point) • Provide evidence of training/information to workers by PROECO SRL on the importance of complying with the requirements for compulsory work	Reference ILO Conventions and Recommendations: ILO Convention 29 ILO Convention 105
Health and safety	• Carrying out a risk analysis of workers' health and safety to identify, avoid or address potential risks to the health and safety of all personnel • Ensuring that staff receive regular and documented health and safety training and that such training is repeated for new and reassigned staff as well aś in the event of accidents, including through the provision of targeted operating instructions • Maintain written records of all accidents occurring in the workplace • Provide employees with the necessary PPE to avoid or cope with potential health and safety risks • In the case of work-related injury, provide first aid and assist the worker in obtaining further medical treatment • take into account all risks arising from the work performed by pregnant workers/new mothers and ensure that all reasonable steps are taken to remove or reduce any risks related to their health and safety • Ensure, for use by all personnel, access to clean bathroom facilities, access to potable water and, where applicable, healthy premises suitable for food storage. • Give all staff the right to leave work in the event of imminent serious danger without asking the company's permission	The basis of this principle is compliance with Italian Law D.Lgs 81/08 s.m.i. Adhering to the contents of this standard entails fulfilling this requirement. Reference ILO Conventions and Recommendations: ILO Convention 155 ILO Convention 183
Freedom of association and the right to collective bargaining	• Non interferire in alcun modo con la formazione, il funzionamento o la gestione delle organizzazioni dei lavoratori o di contrattazione collettiva come testimoniato dalla applicazione del CCNL richiamato nei contratti/lettere di assunzione individuali • Informare efficacemente il personale sulla libertà di aderire a qualsiasi organizzazione a propria scelta • Garantire che i rappresentanti del personale e il personale coinvolto nell'organizzazione dei lavoratori non siano soggetti a discriminazione, vessazione, intimidazione o ritorsione per il fatto di essere membro del sindacato o di partecipare alle attività sindacali, e garantire che tali rappresentanti abbiano accesso ai propri membri nel luogo di lavoro. • Permettere ai lavoratori di riunirsi, nominare un loro Rappresentante (RLS) e comunicare con i propri associati nel luogo di lavoro anche grazie alle strutture messe a loro disposizione per eventuali incontri/riunioni.	Reference ILO Conventions and Recommendations: ILO Convention 87 ILO Convention 135 ILO Convention 98

Discrimination	• Selecting workers on the basis of skills and abilities • Treat all workers equally, offering them equal opportunities and conditions • With regard to recruitment, remuneration, training, promotion, dismissal and retirement, do not engage in or support discrimination on the basis of race, social class, national origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, trade union membership, political opinion, age or any other condition that could lead to discrimination • Do not hinder staff in the exercise of their personal rights to follow principles or practices or meet needs related to 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 • Not permitting behaviour, including gestures, language or physical contact, that may be deemed sexually coercive, threatening, abusive or exploitative	Reference ILO Conventions and Recommendations: ILO Convention 111 ILO Convention 100 ILO Convention 159 ILO Convention 177 ILO Convention 169
Disciplinary practices	• Do not apply disciplinary measures contrary to the dignity and respect of the worker, limiting oneself only to the measures provided for by the legislation in force • Treat all workers with dignity and respect, strictly excluding the use of any kind of unusual and/or bodily disciplinary practices • Take care that 'psychological terror' and 'sexual harassment', i.e. psychological pressure and conditioning with verbal and gestural innuendoes, do not occur, that unfavourable working conditions are not used as 'instruments of punishment', that disciplinary practices are not hastily and simplistically adopted	Reference ILO Conventions and Recommendations: ILO Convention 29
Working hours	• Do not work more than 48 hours per week, nor ask for more than 12 hours of overtime, agreed with the worker • Do not habitually ask for overtime • Respect the number of hours stipulated in the national contract for the category, and overtime, when necessary, must be compensated appropriately • Guaranteeing at least one day off out of seven in particular is important to plan work carefully, trying to rationalise production processes, to correctly foresee the number of staff needed, to avoid forcing employees to work excessive overtime and to ensure that they are able to take their planned holidays	Reference ILO Conventions and Recommendations: ILO Convention 1 ILO Recommendation 116
Remuneration	• Respect the staff's right to a living wage and ensure that the salary paid for a standard working week always corresponds to legal or minimum industry standards and is always sufficient to meet the staff's basic needs, in addition to providing some discretionary income • Do not make deductions for disciplinary purposes and in any case specify the reasons for any deductions from the pay envelope; exceptions to this rule only apply when both of the following conditions exist: a) pay deductions for disciplinary purposes are permitted by national law; b) an agreement resulting from free collective bargaining is in place • Ensure that the composition of wages and contribution allowances are clearly and regularly detailed in writing for each pay period and clearly for the benefit of workers • Ensure that wages and salary allowances are passed on in full compliance with applicable laws and that remuneration is paid in a manner agreed with the employee so that there are no additional costs for receiving them. • Do not enter into 'labour-only' contractual agreements, short-term consecutive contracts, and/or bogus apprenticeship schemes aimed at avoiding the fulfilment of the company's obligations to its staff under current labour and social security legislation; apprenticeship contracts are limited in time and include a clearly defined training programme. • Ensure that all overtime work is reimbursed with a premium as defined by national law.	Reference ILO Conventions and Recommendations: ILO Convention 100 ILO Convention 131 ILO Convention 102

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The supplier also undertakes:

- To cooperate with PROECO SRL in the promotion and monitoring of socially responsible behaviour, agreeing to accept any inspections at its operating sites by PROECO SRL, according to modalities to be agreed upon;
- To inform PROECO SRL, promptly and fully, of any relevant business relations with other suppliers/subcontractors and sub-suppliers;
- To implement improvement actions where necessary.

Issued and Approved on 06 Febbraio 2025

CEO & Legal Representative
Giovanni Arzilli

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