

SA8000 Social Responsibility Policy

Ascot Industrial S.r.l. | Revision 01 | Rev. date: 06/11/2024

Ascot Industrial S.r.l. (hereinafter also the "Company") counts among its primary values that of business ethics and the promotion of the values of loyalty, fairness and respect, both within its own organisation and towards its stakeholders. Consistent with its values, the Company considers it a priority to:

- improve the quality of life of its employees and of the community in which it operates, in line with the concept of sustainable development, taking into account — in the definition and implementation of its strategy — the social, environmental and economic impacts arising from its activities;
- act constantly to engage, motivate and develop the professional skills of all personnel, through training, information and awareness-raising initiatives;
- select and evaluate its suppliers taking into consideration their commitment to complying with the requirements of the SA8000 Standard.

For the Company, towards its stakeholders, this means considering:

- personnel as a strategic resource, ensuring respect for their rights and promoting their professional and personal development;
- suppliers as partners, not only for the optimal performance of activities, but also for compliance with the principles of Social Responsibility;
- customers as a fundamental element of business success, working for their satisfaction and committing to market quality products compliant with legal requirements.

In line with the provisions set out in its Code of Ethics and in its Quality, Environment, Health and Safety Policy, this SA8000 Policy of Ascot Industrial S.r.l. confirms the Company's commitment to achieving the highest ethical standards and sustainable business development, respecting and applying within the corporate context the principles of the SA8000:2014 Standard (hereinafter also the "Standard"), in compliance with the fundamental principles established by the Universal Declaration of Human Rights, the ILO conventions, and the national and international regulations in force concerning human and labour rights.

In particular, in line with the Standard, the Company undertakes to:

- **Reject the use of child labour:** not to use or support the use of child labour, in line with current legislation, the relevant ILO Conventions and the International Convention on the Rights of the Child.
- **Reject the use of forced and compulsory labour:** not to use or support the use of forced and compulsory labour, condemning any form of modern slavery and prohibiting the use of labour performed involuntarily, including as a result of threats or debts; the Company also undertakes to combat every form of human trafficking.

- **Protect the health, safety and well-being of workers:** to ensure a healthy and safe workplace, adopting all appropriate measures to protect the well-being of workers and to prevent accidents and harm to their health during their work in the company.
- **Respect freedom of association and collective bargaining:** to respect and protect workers' freedom to associate, not to hinder their membership of trade union organisations and to promote collective bargaining.
- **Respect the right to a decent wage and fair working hours:** to comply with the laws in force regarding working hours, rest periods and holidays, ensuring the recognition of the salary provided for by current legislation and making sure it is more than sufficient to guarantee a dignified life for the whole family.
- **Respect dignity, equality and non-discrimination:** to prohibit any form of discrimination based on age, ethnic origin, nationality, political and trade union opinions, religious beliefs, sexual orientation, gender identity, physical and mental disabilities, and any other personal characteristic not relevant to the professional sphere.
- **Prohibit improper disciplinary practices:** to prohibit any form of physical, corporal and mental coercion, including verbal abuse or any further offence against the dignity of persons.
- **Develop an SA8000 management system:** to progressively implement an SA8000 management system in order to further oversee social responsibility matters, promoting continuous improvement processes fed by the assessment and mitigation of risks.

The choice to ensure compliance with the requirements of the Standard is intended as a signal to make evident that the Company's commitment to the care and protection of people is reserved equally to all workers.

The Company is directly committed to establishing, implementing, keeping operational and improving within its structure all the necessary arrangements concerning social responsibility, aimed at constantly ensuring compliance with the requirements of the Standard and those provided by the applicable reference legislation.

This commitment translates operationally into the following activities:

1. **Legislative compliance:** comply with all national laws and the ILO conventions and Recommendations concerning labour law and the protection of workers' health and safety.
2. **Combating child labour:** not to use (or favour the use of) child labour; establish, where necessary, procedures for the rehabilitation of children found working in situations that fall within the definition of child labour, providing in particular support for school attendance; never expose children and young workers to dangerous, unsafe or health-damaging situations.
3. **Combating forced or compulsory labour:** not to use or favour the use of compulsory labour, condemning any form of modern slavery and prohibiting the use of labour performed involuntarily, including as a result of threats of punishment or debts. In particular, at the start of employment, workers cannot be required to lodge deposits.
4. **Health and safety for workers:** ensure a healthy and safe workplace, implementing measures for the prevention of accidents and harm to health, both in the workplace and as a consequence of it; ensure that all personnel, including new hires, receive regular and documented training on

health and safety; establish systems to detect, avoid and address potential risks to health and safety.

5. **Promoting collective bargaining:** respect workers' right to join and form trade unions of their choice and the right to collective bargaining; ensure that union representatives are not discriminated against in the workplace and that they can communicate with their members.
6. **Combating discrimination:** not to discriminate on the basis of race, social class, territorial/national origin, religion, disability, sex, sexual orientation, trade union membership or political affiliation, age; not to interfere with personnel's right to follow principles or practices related to religious beliefs; not to allow behaviour — including gestures, language or physical contact — that is sexually coercive, threatening, abusive or exploitative; never, under any circumstances, to require workers to undergo pregnancy and/or virginity tests.
7. **Disciplinary practices:** a guarantee not to use or favour corporal punishment, mental or physical punishment, verbal abuse, or mobbing in the workplace.
8. **Working hours:** compliance with the working hours provided for by the laws in force and with sector standards.
9. **Support for fair remuneration:** ensure compliance with legal minimum wages, so that the salary meets essential needs and that a portion of the income remains available; ensure that deductions from wages are not made for disciplinary purposes and that the pay slip is clear and understandable to all; ensure that remuneration is paid in accordance with legal requirements and in the most convenient manner for workers.
10. **Communication:** communicate to all stakeholders the current situation of compliance with the principles of SA8000 and the company's social responsibility policy.
11. **Reporting and grievances:** encourage the reporting of any type of complaint by stakeholders relating to non-respected elements of the Standard and of the policy; should complaints remain unheard within the company, the references of the Certification Body and of the accreditation body SAAS (Social Accountability Accreditation Services) are provided below.
12. **Monitoring:** define an annual plan of measurable objectives. The Company undertakes to make the objectives plan a living tool, fundamental for the management of the company, to be revised whenever the facts on which decisions were based change.
13. **Suppliers:** collaborate with its suppliers to implement a Social Policy that, through technical assistance and greater awareness, leads to an improvement in the working conditions of employees.

The Company undertakes to ensure that the policy is documented, implemented, understood, kept active and communicated both internally (by displaying it clearly, visibly and understandably in the workplace) and externally (through publication on the company website), making it accessible in an understandable form to all personnel (translating it, where necessary, into the languages spoken by foreign workers), to the members of the supply chain and to other interested parties, promoting their involvement and hoping for a fruitful and constructive interaction. Upon request, it is made accessible to all interested parties.

The Company also undertakes to map and periodically assess the main risks relating to social responsibility, and top management will allocate adequate resources for the implementation and continuous monitoring of this Policy, ensuring the absence of any discrimination or retaliation

against any employees and/or other interested parties who provide comments, recommendations, reports or complaints concerning the workplace and/or potential non-conformities with the Standard.

How to submit a report or complaint

Any report or complaint concerning the workplace and/or potential non-conformities with the Standard may be submitted through the dedicated reporting boxes located at the company premises, by contacting the Social Performance Team by email (socialperformanceteam@ascotinternational.com), or by sending it directly to the following addresses:

- **Intertek Italia S.p.A.** (the body that issued the SA8000 certification) — via G. Miglioli 2/A, 20063 Cernusco S/N (MI), Italy. Tel. +39 02-95383833.
- **SAAS (Social Accountability Accreditation Service)** — Director of Accreditation, 220 East 23rd Street, Suite 605, New York, NY 10010, USA. Fax: +1 212-684-1515, saas@saasaccreditation.org

Gela, 06/11/2024

CEO — Employer