SOCIAL RESPONSIBILITY POLICY

Pursuant to SA8000®:2014 Standard

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The Company's top management, in line with the continuous improvement policy, strategies and actions already implemented in the occupational health and safety management systems in accordance with ISO 45001:18 standard and in the environment management systems (in compliance with ISO 14001:15 standard), has decided to make a commitment to operate according to the principles of Social Responsibility in accordance with to SA8000:14 Standard.

To this end, transparent systems and methods are implemented in order to identify and fulfil the expectations of the main stakeholders (clients, suppliers, workers, citizens, Public Administrations, non-governmental organizations, etc.) and to pursue the dialogue and improvement of the social, economic and environmental values of the territory where it operates.

The consistency of the Social Responsibility Policy with the current corporate strategies is periodically assessed and reviewed by the Management in order to verify its compliance with corporate policies, as already formalized in the Code of Ethics, in the Model of Organization and in 231 protocol and managed together with the relevant Supervisory Body; its adequacy is guaranteed by independent third-party audits.

With the continuous improvement project of Social Responsibility, the Management of Bertani Trasporti SpA formally undertakes the following management **commitments**:

- To comply with International codes, UN and ILO conventions, National laws, EU directives concerning occupational matters and workers' rights, complying with the provisions contained in the official documents and their interpretations;
- To integrate social responsibility requirements into the corporate strategies maintaining them in time and adapting to any new requirements that may be requested;
- To ensure the periodic monitoring and continuous improvement of the management system implemented by defining, within the scope of its functions and Organs, specific goals and programs, verifying their achievement also through a panel of significant indicators;
- To ensure all personnel receive adequate training and information on social responsibility.
- To involve and make suppliers aware of the principles of social responsibilities contained in the SA8000 standard, requesting from them similar commitments and willingness to undergo our assessments and controls on this matter;
- To implement controls and audits within our Organization in order to ascertain compliance with the requirements of the Social Accountability System and therefore adopting any necessary corrective and preventive actions;
- To provide documentary evidence of the commitment concerning the Corporate Social Responsibility and communicating it to stakeholders, including through the preparation of a social Balance Sheet.

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In order to guarantee the functioning of the Social Responsibility System, adequate human, technological and economic resources are conferred, the SA8000 Management Representative has been appointed, SA8000 Workers' Representative has been elected and the Social Performance Team has been set up, which represents the body in charge of implementing and monitoring the SA8000 Management System.

In order to fulfil the aforementioned commitments, **actions, procedures, processes and controls** are ensured, both within Bertani Trasporti Spa and within the organization of its relevant suppliers, over which the former can have control and exercise influence relating to:

1. **Prohibition of child labour**, prevention and management of the risk of **child labour**;
2. **Prohibition** of using or facilitating the use of **forced or compulsory labour** in any explicit or implicit form;
3. **Health and Safety in the workplace**, providing all human and technological resources (appropriate machinery, equipment, and compliant systems) required by legislation for the prevention of accidents and work-related diseases, ensuring all awareness-raising and training actions provided, provision of individual and collective protection devices, assessment of all potential health and safety risks, implementation of prevention and emergency management procedures;
4. **Freedom of Association and right to collective bargaining**: we guarantee all workers respect for their trade union rights and the prevention of any form of discrimination against union members or representatives.
5. **Prohibition of any form of discrimination in the workplace**: from the moment of recruitment, in relation to: race, social class, nationality, 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; threatening or offensive behaviours, including gestures, language and physical contact which are sexually coercive or aimed at exploitation are not allowed. Career advancement is based on the skills of individual workers and on the organizational needs of the company.
6. **Prohibition of any disciplinary procedures not provided for in the** CCNL (National Collective Labour Contract) and in the WORKERS' STATUTE OF RIGHTS. If unavoidable, we limit ourselves to applying disciplinary sanctions set forth in the CCNL, in order to ensure correct rules of conduct towards clients, colleagues and management. Corporal punishment, mental or physical coercion, verbal abuse of staff cannot be used nor tolerated.
7. **Application of working hours** complying with the laws in force, contract and industry standard rules; ordinary work must not exceed 39 hours per week with one day off; overtime must not exceed 12 hours per week, must be voluntary and must be remunerated at a higher rate; if the company has entered into the relevant collective bargaining contract, requests for overtime must be made in accordance with the agreements.
8. **Ensure that workers are paid in accordance with the contract**, industry practices and legal minimum wages; wages must meet basic needs plus an additional amount; payroll must be clearly and properly detailed; wages must be paid according to legal requirements and in the

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most convenient way for the worker; we undertake not to overuse cooperation contracts, which do not guarantee social security regularisation of the worker; false apprenticeship schemes must not be applied.

This policy and the SA8000 Standard are clearly and visibly displayed in an appropriate and comprehensible format, both in the workplace and on the company's website, intranet and through any other modalities; upon review of the Management System, Management will update it annually to verify its appropriateness in relation to new developments.

The Management ensures all personnel and interested parties the possibility of reporting any non-compliance or complaints regarding SA8000 standard issues which will be analyzed and managed; these reports can be forwarded anonymously, confidentially or signed. The report/claim can be sent to the company (by email or by using the mailbox suggestions/complaints available in each local unit of the company), to the SA8000 certification body and ultimately to the SAAS at the following contacts:

- to the company: sptbertani@bertanitrasporti.it ;
- to SA8000 Bertani Workers' Representative: rlsa@bertanitrasporti.it ;
- to the certification body TÜV Italia c/o TÜV Italia S.r.l. Viale Fulvio Testi, 280/6 - 20126 - Milano – https://tuvsud.segnalazioni.net/ - Tel: +39 02 24130.1;
- to **SAI Social Accountability International** – 9 East 37th Street; 10th Floor – New York, NY 10016 – tel: +1 (212) 684-1414 – mail: SA8000@sa-intl.org
- to **SAAS (Social Accountability Accreditation Service**) – mail: saas@saasaccreditation.org.

In order to fulfil the abovementioned commitments, the Company pursues the utmost involvement and participation of its personnel and suppliers in sharing the policy and its goals; it undertakes to provide evidentiary documents of the performances concerning the requirements of the reference standards, through the annual preparation of the SA 8000 Balance Sheet communicating the results internally to the company organization and to the other interested parties through the Sustainability Report published on the company's website.

Il Rappresentante della Direzione SA 8000
Cesare Bertani

Bertani TRASPORTI S.p.A.
Via Europa, 26 - 46043 Castiglione d/S. (MN)
Tel. 0376 6761 - C.F. e P.IVA 00247680200

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