

The CEO of the company SELT S.p.A. is fully aware of the importance of the implementation of a policy of social responsibility, defined according to the parameters of the SA8000: 2014 norm. Thus, the CEO has chosen to develop a policy which follows this norm, with the full involvement of the employees and all interested parties. To this end, he approved this manual which defines the philosophy, rules and procedures of the policy itself.

SELT S.p.A. believes that human resources are the central element of a modern and innovative company, and has chosen to adhere to the SA8000: 2014 norm and to comply with the most rigorous reference values for the assessment and measurement of the well-being of human resources within the company.

The company has always demonstrated significant care towards its staff, because we believe that the well-being and economic satisfaction of our staff is important, but also because we believe that such care is important in terms of the quality of the work done, and the conditions of dialogue and collaboration between staff and management that characterize the company. We believe that these are the most effective tools for one's growth and development. Furthermore, considering the sector in which the company operates, and the environmental and social context, it should be emphasized that the quality of the product we offer constitutes a decisive element in the relationship with the market and that the quality of operations lies exclusively in the hands of the operators themselves.

For the reasons described above, with the adoption of the SA8000: 2014 norm, SELT S.p.A. is committed to complying with national and international legislation with reference to its own sector of activity, as well as to apply all the tools referred to by the norm in a direct or indirect manner.

To this end, the task is to design and implement targeted actions, in all phases of the operational and organizational process. The implementation of the policy refers to the realization of all of the services provided and to the application of the SA8000: 2014 norm in all its parts, with reference to the company and all its component parts: central offices and peripheral units.

The company is also committed to following the Policy of Social Responsibility amongst all the staff who operate within the production units, as well as with stakeholders and in the promotion of actions and instruments aimed at involving their suppliers, with reference to the principles of the norm. In addition to the commitments described above, the company considers continuous improvement on these fundamental principles regarding implementation, verification and possible changes to be made to the social responsibility management system. The company's Policy of Social Responsibility, with reference to the points of the Norm SA8000: 2014, translates into the following commitments:

- 1) With reference to **child labor**: the company assumes a fundamental principle of not employing children in its minor production units, other than in terms and ways permitted by law; the company is committed in the case of employing minors or young people to implement all remedial actions that promote psycho-physical, moral and intellectual growth, and ensuring adequate protection and support for all interested parties and to the community of those employed.
- 2) The company undertakes not to force individual and collective freedom of workers with reference to situations of **forced work**. All the people employed by the company are contractually obliged according to the voluntary principle of the contractor.
- 3) In relation to the principles of **health and safety** in the workplace, the company has always applied rigorous industry standards, to make the place of work a safe and healthy place for workers and anyone else involved from other related businesses. With a view to continuous improvement, the company has proposed and defined a proactive policy in order to prevent the risks of accidents at the sites of work and to minimize the causes of injury.
- 4) The company fully respects the organizational and protection autonomy of workers and of their rights, with particular reference to the **freedom of association and the right to union negotiations**, which the company recognizes in both institutionalized form and in ways that are not formalized.

- 5) there have never been any incidents of **discrimination** in the company, and we uphold the principle of equal opportunities in all phases of business life, from recruitment to termination of the employment relationship. The management has made the commitment to counteract any manifestation in this sense and to repress attitudes that can express itself in this direction within the offices and production units.
- 6) The company refrains from resorting to **disciplinary practices** of any kind, direct or indirect, concerning forms of coercion and physical or psychological violence. The company is committed to adhering to the disciplinary code, as defined by the Union agreement, which determines a correspondence between infringements and disciplinary measures, regarding the psycho-physical and moral integrity of the worker. The management has defined and developed tools to allow its employees to make a complaint or an allegation.
- 7) The **working hours** in the company are defined by the sector's Union Contract and are regulated by current laws. In any case, they never exceed the limits set in the SA8000: 2014 norm. The use of overtime is an exception that occurs in well-defined and circumstantial situations. The extraordinary hours are regularly recorded in payroll and paid.
- 8) **Remuneration** is also defined according to the Union Contract and is paid according to current regulations. The company also does not adopt apprenticeship contracts as a means to circumvent laws and regulations concerning the remuneration and social security of the workers.
- 9) The company has prepared a control plan regarding its **suppliers**, defining and implementing a procedure for selecting suppliers based on their ability to meet need, and to commit to the principle of continuous improvement by adhering to the requirements of the SA8000: 2014 norm.
- 10) The company is committed to respond adequately to the training / information needs of workers within the operational sites in relation to the Policy of Social Responsibility, implemented with reference to the SA8000: 2014 norm. According to the contents of the Policy of Social Responsibility, the company has prepared adequate **training** plans, as per the appropriate procedure. The training is continuously updated on the basis of the results of changes determined by the application of the principle of continuous improvement (see recent privacy obligations sec. Reg.UE 2016/679), and will be provided throughout the professional life of the workers, starting from the initial employment until the termination of the contract, and includes circumstances such as the presence of job changes or changes in the production area.
- 11) The company is committed to involve external **stakeholders** with particular attention to public authorities, trade associations, and the local community in relation to the location of the sites, and the NGOs present in the area, for the purpose of establishing a relationship of collaboration and stimulus for the company itself, as well as from the perspective of growth and continuous improvement.
- 12) The company has defined its **internal review** procedures, intended as a tool to check the effectiveness of the implemented policy and to evaluate its adhesion or otherwise to the principles of the norm, in terms of adequacy and appropriateness.

- 13) The company has developed an **external communication** plan of the Policy of Social Responsibility, with a view to informing stakeholders of the company's performance data, in relation to the application of the norm SA8000:2014.
- 14) The company as a means of highlighting its activities regarding the Policy of Social Responsibility, and with a view of sustaining similar behaviour amongst its partners, has chosen to make public its Policy of Social Responsibility, thus making it **available** to anyone interested.
- 15) The Policy of Social Responsibility with reference to the SA8000: 2014 Norm provides for an implementation and control system defining in some cases specific **procedures**. The cases in which the company has decided to adopt specific procedures are those not explicitly dealt with by the current legislation.

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L'Amministratore

Mauro Ceffa

