

SA 8000
ETHICAL CODE
OF CONDUCT 2023

Quality | Environment | Ethics



SOCIAL ETHICS CODE OF CONDUCT

This document expresses the will of the Management of the Interna group to clearly define the values and behavioural regulations which are a reference point when carrying out its activities and to safeguard the reputation and the image of the Group on the reference market. It is a pivotal element of the company's organisational model, along with its mission, vision, organisational dispositions and integrated system **Quality, Environment & FSC and Ethics** and represents a tool which safeguards all those who, whatever their position or role, freely participate in creating and divulging a transparent image of the company's values.

The aims of this document may be summarised as follows:

- 1) to contribute to the respect of fundamental human and trade-union rights, international labour regulations and safeguard of the environment;
- 2) to contribute to guarantee that the growing process of internationalisation takes place with constant respect for the point above;
- 3) to contribute, either directly or indirectly, to the promotion and improvement of working conditions, the safeguard of health and safety and respect for working hours and salary levels established by international regulations or collective agreements within the companies with which the Interna Group acts. Whenever their authority so permits, Interna Contract spa, Interna Collection srl, Interna Holding spa and Logica srl, and all companies with which they will sign contracts for the supply of goods or components for such goods, are committed to the respect of the norms contained in the following Fundamental Conventions of the ILO: Convention N° 87 concerning the freedom of association, Convention N° 98 concerning the right to organise and collective bargaining, Conventions N°100 and 111 concerning equal retribution for men and women and discrimination in the workplace, Convention N° 155 concerning occupational health and safety and conventions N° 138, 146 and 182 concerning minimum working age and child labour.

In order to conduct their activities responsibly and ethically, unexceptionably, the management established the following principles:

Discrimination and freedom of association

- discrimination regarding recruitment, remuneration, access to training, promotions, dismissal or retirement based on race, colour, sex, age, religious beliefs, marital status, sexual orientation, political affiliation or citizenship, or any other form of discrimination against the law, are neither accepted nor tolerated;
- the same work opportunities are open to everybody, so that anybody may benefit from the equal treatment based on merit, without any form of discrimination;
- the right of all the members of the workforce to form or become members of a trade union of their own choice and their right to collective agreements are guaranteed; membership may never be a reason or motive for discrimination.

Working hours and retribution

The company working hours are contractually defined as follows:

- from Monday to Friday
- from 9.00 am to 1.00 pm and from 2.00 pm to 6 pm

Overtime is worked on a voluntary basis within the limits stipulated in the contract (8 hours/week).

For certain employees, who cover positions of particular responsibility or who are often working on site, the retribution has been individually agreed upon to include overtime, defined by the employee according to their own requirements.

The particular type of activity of the Group often requires overtime to be carried out to compensate for certain periods, such as the deadline of a project, where it is impossible to spread out the requests as happens in normal industrial activities.

Frequent business trips abroad require many hours of travelling and stopovers which are compensated with special transfer allowances.

Overtime, both paid overtime and overtime compensated for in the normal retribution, is registered and monitored on a monthly basis, along with hours to be recouped, in order to check if the total remains within the foreseen contractual limits.

- salaries must correspond to legal standards and, in all cases, must be sufficient to guarantee a person's primary needs and discretionary earnings; the composition of salaries, deductions, indemnities and the modality of the payment of said salaries must be communicated clearly to the workers and must be clearly indicated for their benefit;
- weekly working hours, salaries and overtime, including part-time and contract work, must be regulated according to national legislation.

Child and forced labour

- nobody under the minimum legal age may be employed during any of the production phases, and if no legal working age has been established, a minimum age of 15 must be applied;
- forced labour must never be put into practice, workers must be free to leave the workplace at the end of their shift and surveillance must only be used for safety purposes.

Health and safety

- workers must be granted periods of leave for illness and maternity as established by the law;
- the company must guarantee that the place of work is safe for workers and must comply and improve upon current local laws and regulations regarding health and the prevention of accidents;
- suitable sanitary facilities must be available, they must comply with local hygiene norms and must be well-maintained and cleaned regularly;
- sufficient space must be made available for meals and other breaks;

- if the company supplies living quarters for workers, they must guarantee that the rooms and bathrooms comply with the minimum requirements, are sufficiently ventilated and comply with fire-prevention norms and all other local laws;
- the premises must be well lit and ventilated and all walkways and exits must be accessible at all times;
- sufficient medical assistance must be available at all times in case of emergencies and the persons responsible for medical assistance must be trained in advance in first aid techniques;
- there must be sufficient, well-indicated emergency exits and all workers must be trained to use these exits;
- safety systems on machinery must comply with or improve upon local norms.

Disciplinary procedures

- behaviours such as rude gestures, offensive language or physical contact which could be considered sexually coercive, threatening, offensive or considered to be exploitive, are neither accepted nor tolerated; psychological or physical forms of discipline must not be adopted or encouraged;
- norms and laws regarding the safeguard of the environment where a person's work activities take place must be respected; the entire organisation must actively promote this theme;
- it is forbidden to offer, donate, ask or accept, including through third parties, any kind of reward or personal gain connected with the running of the company.

Actions to be taken towards the behaviour of suppliers

In particular, the Interna Group will be committed to implementing constructive measures so that any company with which it will sign a contract to supply products or services, or a part of such products or services, will fully respect the above points.

Therefore a person will be in charge of the management such agreements and the implementation of internal control programmes in each individual company and in its main suppliers, according to procedures well-defined and documented within the integrated quality, environment and ethics management system.

The controls must be carried out at least annually and the results of the inspections and controls will then be subject to joint analysis between the management, the representative of the management and the Representatives of the workers.

A declaration of conformity with the code of conduct must be signed by the person in charge of each single supplier.

Contracts for the supply of goods or products must clearly specify that non-conformities with the code of conduct, or even the temporary adoption of a plan of action which does not comply with the code, will be considered a breach of the contract and will lead to its repeal.

This code, translated into the local language, will be sent or made available to all the stakeholders using the most suitable means.

Tavagnacco, 29th December 2023
Interna Group Management