

ETS S.r.l. decided to make its ethical and social commitment clear by applying the SA8000 standard, and to develop a social Responsibility Management System applied to the following activities:

**Design of civil, road, railway and related technological systems and naturalistic engineering works. Geognostic, geotechnical, geophysical and mobile diagnostics activities for the analysis of hydrogeological instabilities and the location check for works of art and special artifacts also in the subsoil**

With this "Social Responsibility Policy" ETS S.r.l. declares its total adherence:

- To all the requirements of the reference standard SA8000
- To the Conventions of the International Labor Organization (ILO)
- To the United Nations Convention on the Rights of the Child
- To the Universal Declaration of Human Rights
- To all the National and International Laws on the matter, including Legislative Decree 81/2008 and subsequent amendments, relating to health and safety in the workplace and Legislative Decree 196/03 and subsequent amendments regarding confidentiality and processing of personal data
- To the rules of conduct defined within one's Disciplinary Code.

The purpose of the organizational model is to ensure a safe, comfortable and discrimination-free work environment where employees can express themselves without constraints and with creativity and easily perform their duties.

ETS S.r.l. wishes to be seen, with regard to its Social Responsibility, as an "Excellent Company", and to ensure all interested parties that its activities are carried out aiming at the promotion of respect for the fundamental human rights. Bearing this in mind, ETS S.r.l. is committed to develop its activities especially adhering to the Social Responsibility.

For the Company, this means:

- a) Considering the people who work in ETS S.r.l. as a strategic resource, guaranteeing respect for their rights and promoting their professional and personal growth;
- b) Considering its suppliers of products and services, not only for the service fulfillment but also with regard to Social Responsibility;
- c) Considering its customers as the pillar of business success, meeting their satisfaction also with regard to the requirements of Social Responsibility.

Therefore, our Company, in order to feel and be a "Socially Responsible" company, will be committed to apply, promote and verify the following guidelines (both internally and externally to its suppliers):

- 1) refrain from using child workers under the age of 16;
- 2) refrain from employing young workers and, if necessary, ensure that young workers (aged between 16 and 18) are not exposed to risky, dangerous or harmful situations and that they can profitably continue their school career; in this case, the company guarantees that for no reason the sum of the time spent at school, at work and the travelling time exceeds 10 hours;
- 3) ensure that the apprenticeship contracts are used in the full interest of the worker and in collaboration with training bodies, adhering to the current legislation;
- 4) refrain from giving support or using forced labor, avoiding the withholding of documents, wages or benefits in order to force staff to continue working for the company;
- 5) leave the staff free to leave the workplace at the end of the working day and to end the employment contract according to the rules established by the National Collective Bargaining Agreement;
- 6) refrain from supporting human trafficking;
- 7) set procedures for the collection and resolution of reports from our employees regarding social responsibility issues;
- 8) guarantee a healthy and safe workplace, created with measures for the prevention of accidents and damage to health, both during and after the working hours;
- 9) ensure that all the staff, even newly recruited, receive regular and documented training in health and safety matters;
- 10) set systems to identify, avoid and deal with potential health and safety risks;
- 11) guarantee the supply of Personal Protective Equipment aimed at protecting workers from residual risks associated with work that could not be eliminated at source;
- 12) take into consideration all the risks deriving from the work performed by pregnant workers/new mothers to reduce any risk for their health and safety;
- 13) provide the staff with clean bathrooms, access to drinking water and healthy rooms for the possible food consumption;
- 14) guarantee the staff the possibility to leave their work in case of serious unexpected danger without asking the company for permission;

- 15) grant the right to workers to collective bargaining and free association (including the appointment of trade union representatives);
- 16) ensure that workers' representatives are not subject to discrimination;
- 17) guarantee to hinder forms of discrimination in relation to recruitment, remuneration, access to training and bonuses, promotion, dismissal and/or retirement;
- 18) guarantee the staff the right to follow practices or needs related to race, class, nationality, religion, disability, sex, sexual orientation, age, union membership or political affiliation;
- 19) hinder behaviors or actions that are sexually coercive, threatening, offensive or aimed at the exploitation of workers;
- 20) refrain from subjecting staff to pregnancy or virginity tests;
- 21) ensure that there is no use of corporal punishment, mental or physical coercion, verbal violence against workers;
- 22) respect the working hours required by law, guaranteeing staff at least 1 day of weekly rest;
- 23) guarantee the voluntary nature of overtime and its remuneration higher than the standard time in accordance with the National Collective Bargaining Agreement;
- 24) ensure the recognition of remuneration in accordance with current legislation, which is sufficient to ensure a decent standard of living. Furthermore, in accordance with the provisions of the ILO 100 Convention, the Company grants the right to equal pay for men and women for the same job;
- 25) ensure that wages and remuneration allowances are reasonable and supplied in a convenient way for collection by the worker and in full application of the rules set out in the category National Collective Agreement;
- 26) ensure that payrolls are clear and understandable to workers;
- 27) ensure that the salary paid is sufficient to meet the primary needs of the staff, as well as providing additional discretionary gain;
- 28) ensure that wage withholdings are not for disciplinary purposes, except for the events set in the National Collective Bargaining Agreement of the category;
- 29) refrain from labor-only agreements, consecutive short-term contracts and / or false apprenticeship programs;
- 30) communicate openly with all external and internal stakeholders, promoting the spread and adoption of the principles of social responsibility among suppliers of products and services.

To safeguard the goal to pursue the aforementioned guidelines and to comply with the requirements of the SA8000 standard, the Management has appointed its own SA8000 Representative and the Social Performance Team (SPT) and the Health and Safety Committee have been established with a balanced presence of staff representatives employee and a representative of the Senior Manager.

Furthermore, with the aim at promoting dialogue within the working environment on issues of social responsibility, the company ensures that all workers have the right of representation by directly electing or allowing unions to elect their workers' representatives to the SA8000.

We will take care, in a permanent way, to stimulate, check and verify the commitment to the continuous respect and improvement of the principles established by the SA8000: 2014 standard, referred to our suppliers, encouraging them to identify the most critical areas and to regularly follow improvement paths in its operational management activity.

The Management is committed to ensuring that the Social Responsibility policy is implemented, monitored and supported through the implementation of a Management System containing the related activities and responsibilities and that it is defined as part of the Management Review and reported to the department managers and staff involved, as well as to all those involved in the activity.

The Management guarantees the documentation, implementation, conservation and effective communication to all the staff about its Management System for social responsibility and the results achieved.

This policy is documented, implemented, kept active, communicated and available to all the staff working for ETS S.r.l. or on behalf of it and to the public, including through its website.

The Management  
(Employer)

**ETS S.r.l.**  
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