

SOCIAL POLICY

PROMEMORIA s.r.l.'s Management is aware that, in order to increase competitiveness, it is necessary to operate in total compliance with the applicable laws and to increasingly focus on environmental, social and corporate governance (ESG) issues. a

PROMEMORIA s.r.l. has adopted a code of conduct that sets out the principles it has decided to adopt in conducting its business and in its relations with all its stakeholders, reinforcing the core values of ESG accountability.

Diversity and Inclusion - PROMEMORIA s.r.l. guarantees equal opportunities in all business processes and does not tolerate any discrimination based on ethnicity, gender identity, sexual orientation, religion, age, physical appearance, health, disability, health condition, trade union activity, political orientation, family and civil status, citizenship, social extraction, or any other form of illegal discrimination.

In working relations with colleagues and external parties, PROMEMORIA s.r.l. rejects any attitude that may give rise to physical, sexual, psychological or verbal harassment or violence of any other kind.

The company is committed to implementing the principles of gender equality, with the aim not only of increasing the **presence of women** in the workplace, but also of guaranteeing equal career opportunities, up to the most important senior roles, equal financial treatment, as well as a work environment that proposes a culture of diversity and inclusion.

Minority and local community rights - PROMEMORIA s.r.l. is committed to interacting regularly and systematically with communities to maintain a stakeholder dialogue that enables it to better understand their needs. Specifically, the company undertakes **to ensure** that those who **belong to demographically underrepresented or vulnerable groups** at risk of discrimination and/or marginalisation are **also included in the company**, on equal terms with other workers, so as to guarantee them decent living conditions.

Fair and favourable working conditions - PROMEMORIA s.r.l. undertakes to organise the work of its staff in such a way as to avoid excessive workloads and ensure good work-life balance.

With regard to **working hours**, these are managed as provided by law and collective bargaining agreements, ensuring employees legitimate weekly rest periods, holidays and public holidays, as well as maternity/paternity leave, sick leave and any other leave to the extent permitted by law. Overtime work, except for exceptional technical-productive needs or force majeure, is requested on a voluntary basis, remunerated with the surcharge envisaged by law and within the maximum weekly hours envisaged by the National Collective Agreement.

Conduct amounting to workplace bullying is not permitted in any way, and is prohibited.

Freedom of association and collective bargaining - PROMEMORIA s.r.l. recognises and guarantees the freedom of trade union association and the right to collective bargaining and promotes open dialogue with its employees and their representatives. No forms of retaliation are allowed for those engaged in organising or representing workers.

Prevention of child and forced labour - PROMEMORIA s.r.l. does not tolerate any form of child labour and, for this reason, undertakes to not employ individuals below the minimum age prescribed by law, and ensures that minors are not employed to carry out work that may jeopardise their mental or physical wellbeing and their right to education.

The use or support of any form of **forced or compulsory labour**, understood as any work or service extorted from a person, or for which that person has not volunteered, is not permitted.

Any **form of modern slavery** is condemned, and human trafficking is therefore prohibited. The use of labour carried out under the threat of punishment or to repay debts is therefore prohibited, as is the use of forced labour in all its forms.

Health and Safety - PROMEMORIA s.r.l. complies with its legal obligations on health and safety and undertakes to create a working environment that is adequate from the point of view of the safety and mental and physical health of its employees and contractors, promoting the adoption of appropriate preventive actions in the workplace. In this regard, a specific safety policy has been established that expresses the commitments of PROMEMORIA s.r.l..

Human capital development - PROMEMORIA s.r.l. is committed to promoting the development of human capital through the professional and cultural growth of its employees. Employees are the recipients of specific training plans that are refined during performance appraisals with the goal of ensuring that each employee continues to grow.

Fair Pay - PROMEMORIA s.r.l. is committed to guaranteeing the right for all workers to fair pay, ensuring that there are no unjustified differences in pay between employees who have the same professional characteristics. Remuneration policies are in compliance with applicable laws; overtime work is remunerated with the increase envisaged by national laws.

Indeed, the primary function of the remuneration policy is to motivate and reward individuals who, in various capacities, put their experience and skills at the service of the company, so that they participate, in the first person, in its development.

Privacy and data security - PROMEMORIA s.r.l. is committed to the protection of information regarding its customers, suppliers and employees, paying particular attention to data concerning the privacy and opinions of its employees. The company complies with the obligations set forth in the binding laws, and undertakes to ensure

that all data processing is carried out in compliance with the principles of lawfulness, integrity and confidentiality.

Sustainable Supply - PROMEMORIA s.r.l. believes that corporate social responsibility must not be dissolved in the individual activities carried out by our company, but that it affects the entire value chain. The main component of this philosophy is the development of strong and long-lasting partnerships with our suppliers that are based on mutual trust, respect and commitment and that lead to responsible behaviour. Business partnerships with suppliers are based on mutual cooperation, joint goal setting, and continuous improvement including in relation to ESG goals. PROMEMORIA s.r.l. guarantees consistent processes for selecting and monitoring suppliers of raw materials and services.

PROMEMORIA s.r.l. is aware of the indirect impacts generated by the activities related to its supply chain, and recognises the importance of including ESG assessments in its purchasing processes and in the selection and qualification of suppliers, with a view to also incorporating environmental, social and governance considerations.

The contents of this policy must be shared with staff.

Management shall periodically review the effectiveness of this policy.

MANAGEMENT