

HUMAN RIGHTS POLICY



Index

Premise	3
Working environment	3
Equal opportunities and non-discrimination.....	3
Working conditions.....	3
Freedom of association and collective bargaining	4
Forced labor and child labor.....	4
Training.....	4
Business Partners and suppliers.....	4
Occupational health and safety	4
Rights of local communities	5
Protection of personal data	5
Reports	5
Communication	5
Responsibilities	5

Premise

Respect for human rights is an essential value on which corporate culture and strategy are based. In fact, SODAI carries out its business activities taking into particular consideration the recognition and protection of the dignity, freedom and equality of human beings, the protection of work and Trade Union freedoms, health, safety in the workplace and environment.

With this Policy, SODAI outlines the reference principles and actions taken for the protection of Human Rights in carrying out its activities and promotes respect for all Human Rights, to be understood as inalienable and essential prerogatives of human beings and the basis for construction of societies founded on the principles of equality, solidarity, repudiation of war and for the protection of civil and political rights, social, economic and cultural rights.

The principles of this Policy are the foundation of SODAI's activities, together with those defined in the following documents:

- Code of Ethics;
- Organization, Management and Control Model adopted by the Company pursuant to Legislative Decree no. 231/2001;
- Company policy;
- Sustainability policy.

Working environment

SODAI is committed to creating an inclusive work environment that guarantees respect, integrity, personal development and equal opportunities. Sodai rejects and condemns any form of violence, harassment, threats, intimidation or other forms of abuse, whether physical, verbal, psychological or sexual.

Equal opportunities and non-discrimination

Sodai undertakes to guarantee equal opportunities to all employees and collaborators, in all phases of the employment relationship and professional growth, based exclusively on merit and skills.

Sodai prevents and repudiates any form of illegitimate discrimination related to gender, age, disability, ethnic, social and geographical belonging, trade union, language, religion, political or sexual orientation, gender identity, nationality, marital status.

Working conditions

Consistently with its Code of Ethics, SODAI deems any act or behavior that constitutes harassment or violence in the workplace unacceptable.

SODAI guarantees fair remuneration in line with the provisions of collective agreements, industry standards and undertakes to operate in full compliance with the laws in force on salaries, benefits, working hours and overtime.

Freedom of association and collective bargaining

Sodai recognizes and promotes the right to free association and collective bargaining at all levels and is actively committed to combating all forms of abuse or discrimination against individuals engaged in the organization or representation of workers.

Forced labor and child labor

Sodai rejects the use of forced or compulsory labor and guarantees working conditions that comply with the laws and regulations in force. The work performance, both ordinary and extraordinary, is free expression of the will of the workers and is free of any form of physical and/or psychological coercion.

Sodai condemns the use of forms of child labor prohibited under the international and national legislation in force regarding the minimum age for admission to work.

Training

Sodai organizes specific training courses for its employees with the aim of ensuring the growth of the skills required also with a view to the development and enhancement of human capital.

Business Partners and suppliers

Sodai takes into account the potential impacts on human rights deriving from the activities of the Business Partners in the management of commercial relations.

Sodai requires all business partners and suppliers to adhere to corporate values and principles, with a view to identifying reliable partners with whom to activate a lasting collaboration over time, developing a virtuous cycle aimed at mutual improvement and the achievement of set objectives..

Occupational health and safety

Sodai undertakes to promote a corporate culture that guarantees suitable working, healthy and hygienic conditions through the adoption of high standards of health and safety protection, with the aim of preventing any risks that could compromise physical integrity and health of all the subjects with whom it interacts. For this reason, it has adopted and certified a safety management system, according to the ISO 45001 standard.

The prevention of accidents and the safeguarding of health and safety in the workplace are guaranteed and disseminated to all levels of the company organization and to Business Partners, including through training and awareness activities.

Rights of local communities

Sodai is committed to respecting the rights of local communities in the areas where it carries out its activities and to reducing the social and environmental impact.

It undertakes to engage in behavior that is respectful of the contexts in which it is located and to exercise a positive influence on the territories.

Protection of personal data

Sodai undertakes to protect information relating to its employees and, more generally to its stakeholders, generated or acquired internally and in business relationships, and to avoid any misuse of this information.

The company intends to ensure that the processing of personal data takes place in the most complete respect for fundamental rights and freedoms, as well as for the dignity of the data subjects, as required by the regulations in force.

Reports

In order to manage any irregularities or violations of the principles contained in its Code of Ethics, in the Model pursuant to Legislative Decree no. 231/2001 and in the Human Rights Policy, SODAI provides suitable reporting channels.

Reports can be sent either by e-mail to odv@sodai.com or by post to the attention of the Supervisory Body at the Operating Office of Sodai S.p.A. from Milan.

The reporting channels are available on the company's website and accessible both to internal staff and to third parties who in any capacity have a relationship with Sodai.

SODAI guarantees whistleblowers against any type of retaliation, ensuring the confidentiality of the whistleblower's identity, without prejudice to legal obligations.

Communication

Sodai undertakes to promote and disseminate this Policy for the protection of human rights to all employees.

This Policy is also available on the institutional website (www.sodai.com) so that, with a view to transparency and collaboration, it is accessible to all stakeholders.

Responsibilities

The Management is responsible for the implementation and monitoring of the Human Rights Policy.

Milan, September 13th, 2022

SODAI S.p.A.
General Management