



Annex 1 – Social Responsibility Policy

Code of Ethics and Conduct

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Foreword

This document outlines Torneria Automatica Alfredo Colombo's commitment to operating in an ethical and sustainable manner in the field of human rights and working conditions for all employees and stakeholders, with the aim of adopting a proactive and transparent approach in the management of the human resources that are part of the organization.

1. Introduction

To enhance the effectiveness and efficiency of its Corporate Quality System within the broader context of Corporate Social Responsibility, as well as to ensure continuity and integration with the other management systems already in place (Quality, Health & Safety, and Environment), Torneria Automatica Alfredo Colombo is committed to respecting human rights and ensuring fair and safe working conditions for all employees and stakeholders.

In line with its sustainability strategy and with reference to the principles of the SA8000 standard, Torneria Automatica Alfredo Colombo undertakes to operate in a responsible and sustainable manner, ensuring that all organizational activities are carried out in compliance with:

- the applicable national laws relevant to its sector of activity
- the provisions contained in the ILO (International Labor Organization) conventions
- the standards established by the United Nations on Social Responsibility

2. Scope of Application

This policy applies to all employees, managers, suppliers, business partners and other stakeholders who operate for or on behalf of Torneria Automatica Alfredo Colombo. To improve its relationship with the aforementioned interested parties, Torneria Automatica Alfredo Colombo aims for the principles of the standard to be understood by all internal and external stakeholders of the Company, within the scope of their respective operations.

3. General Principles

The objectives of this policy are

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- build greater trust among stakeholders and social organizations by concretely demonstrating respect for ethical and social principles
- improve relationships with institutions by facilitating interactions with authorities responsible for overseeing specific obligations (social security, assistance, safety control, privacy, etc.)
- improve the company climate by increasingly involving employees in achieving business goals and promoting workplace well-being
- consider all stakeholders as partners, not only in the provision of goods or services but also in the adoption of ethical behavior throughout the entire value chain

4. Specific Guidelines

To this end, Torneria Automatica Alfredo Colombo ensures compliance with the following requirements

1. **Child Labor and Young Workers:** we guarantee that we do not employ or support the use of child labor. We comply with laws on the minimum age for employment and ensure safe and appropriate working conditions for young workers (any worker above the age of a child but under 18 years old).
2. **Wages and Benefits:** we ensure that wages and benefits comply with minimum wage laws and industry standards. We are committed to providing fair and transparent remuneration.
3. **Working Hours:** we respect legal regulations on working hours and ensure adequate rest periods.
4. **Modern Slavery (slavery, servitude, forced and compulsory labor, and human trafficking):** we strongly condemn modern slavery, forced labor, and human trafficking. We are committed to preventing such practices in all our operations.
5. **Ethical Recruitment:** we implement ethical and transparent recruitment practices, ensuring that all employees are engaged voluntarily and with their informed consent.
6. **Freedom of Association and Collective Bargaining:** we respect employees' rights to freely associate and to engage in collective bargaining. We encourage open and constructive dialogue with workers' representatives.
7. **Harassment and Non-Discrimination:** we promote a workplace free from harassment and discrimination of any kind. We are committed to ensuring equal opportunities for all employees.
8. **Women's Rights:** we support gender equality and take action to ensure equal opportunities for women, respecting their rights in terms of maternity and parenthood.

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9. **Diversity, Equality, and Inclusion:** we value diversity and promote an inclusive work environment. We are committed to creating a corporate culture in which everyone feels respected, valued, and part of “the same team.”

10. **Health and Safety:** we guarantee all collaborators a beautiful, healthy and safe workplace.

11. **Disciplinary Practices:** we do not tolerate the use of physical punishment, physical or mental coercion, or verbal and physical abuse.

12. **Use of Private or Public Security Forces:** We engage private or public security forces responsibly and with respect for human rights, ensuring they are properly trained and supervised.

5. Communication

Torneria Automatica Alfredo Colombo promotes the implementation of this Policy through communication, training, and awareness-raising activities on Social Responsibility issues, involving all personnel and stakeholders in the development and implementation of improvement proposals. To guarantee the above-mentioned requirements it is necessary the full support not only from the Direction, but also from all Managers and the representatives of all stakeholders, so that these principles are effectively respected.

6. Reporting

To ensure a working environment where it is possible to freely report any illegitimate behavior carried out in violation of the provisions outlined above, Torneria Automatica Alfredo Colombo has implemented its own Whistleblowing System. The procedure complies with the Legislative Decree 24/2023, which transposes EU Directive 2019/1937 concerning the protection of individuals who report violations of national or European Union laws that harm the public interest or the integrity of public administration or private entities, of which they have become aware in a public or private work-related context. The Whistleblowing procedure regulates the process of reporting illegitimate behaviors, including matters covered by this Policy, and establishes appropriate communication channels for the receipt, analysis, and management of reports submitted or transmitted by anyone, including on a confidential basis. All relevant information is available on the company website at: www.torneriacolombo.it

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7. Responsibility

The responsibility for the implementation of this policy lies with the Human Resources & Corporate Social Responsibility Process, governed by HRCM together with HRP and HRT, as well as with the Health, Safety and Environment Process, managed by HSE. Additionally, the Procurement Process, governed by SC and BUY, is responsible for ensuring the application of these principles throughout the supply chain. The entire system is overseen by the Sustainability Committee.

8. Review

This policy is subject to periodic review to ensure its continued adequacy and effectiveness.