

# EMPLOYMENT AND LABOUR STANDARDS

**Namirial S.p.A.**

Via Caduti sul Lavoro n. 4, 60019 Senigallia (An) - Italia | Tel. +39 071 63494  
www.namirial.com | amm.namirial@sicurezza postale.it | P.IVA IT02046570426  
C.F. e iscriz. al Reg. Impr. Ancona N. 02046570426 | REA N. AN - 157295  
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## GENERAL INFORMATION

### Documentary check

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### Formal control

Edited by:	Reviewed by:	Approved by:
<i>HR/Compliance Team</i>	<i>Legal Team</i>	<i>BoD</i>

### Version control

Version	Changes	Changes description	Date
1.0	Original	Document creation	22/10/2020
2.0	Update	References to 231 Organizational Model	28/02/2023

### Access control

N.	Role	Reading	Reading and Editing
1	Legal Team		X
2	HR Team		X
3	Compliance Team		X
4	Employees	X	



## 1. INTRODUCTION

With this Employment and Labour Standards Policy (hereinafter also "Policy"), Namirial S.p.A. (hereinafter also "Company") is committed to implementing fair labour practices at all of its workplaces, ensuring that employees at all levels are treated with respect and consideration, and safeguarding the company's compliance with applicable laws and industry standards.

The Board of Company has approved this Policy and has delegated responsibility for its oversight to its CEO: Mr. Massimiliano Pellegrini.

This Policy shall be read and understood in conjunction with the 231 Organization Model adopted by the Company (approved by way of resolution of the Board of Directors Meeting on 26.10.2022) and the related policies, including the Code of Ethics and Whistleblowing Policy.

### 1.1. Scope

The Policy applies to all operations and employees under the direct control and responsibility of Company (including contractors working at the company's sites and premises) both domestically and abroad.

All group companies and business units worldwide, including joint ventures where we have a controlling interest, are required to apply this Policy and its principles. Where we have a non-controlling interest, we should encourage the application of this Policy with our business partners. Existing business relationships should also be assessed from time to time.

In addition, this Policy must be considered when entering into new business relationships, either through mergers, acquisitions, joint venture or new customers and suppliers. Such new relationships may require careful assessment of the risks and issues surrounding the employment and labour practices of any business partner.

### 1.2. Document name and identification

This document is updated to the version resulting from the "Version Control" or "Documentary Check" referred to in the "General Information" of this Policy.

Company ensures constant verification and constant updating of the document that takes into account any subsequent regulatory updates.

Furthermore, Company undertakes to make this document known and available to all employees and to all interested parties, by providing a suitable training.

### 1.3. Approvation rules

The Board of Company has approved this Policy and has delegated responsibility for its oversight to the CEO: Mr. Massimiliano Pellegrini.

The responsible for updating this document are identified in the members of the HR and Compliance department.



## **1.4. Organisation**

Below there are the company data of Company and related contacts:

**COMPANY**

**Registered Office:** Namirial S.p.A.

**VAT number (IT):** 02046570426

**Phone:** 071-63494

**E-mail:** [info@namirial.com](mailto:info@namirial.com)

**Web Site:** [www.namirial.com](http://www.namirial.com)



## 2. POLICY

### 2.1 Purposes

With respect to the Employment and Labour Standards, all operations and activities under the control of Company, no matter where in the world, shall be conducted so as to:

- Promote workplace equality and seek to eliminate all forms of unfair discrimination, regardless of:
  - a. gender, including gender reassignment;
  - b. sexual orientation;
  - c. marital or civil partnership status;
  - d. age;
  - e. disability;
  - f. race (including colour, nationality, and ethnic or national origin);
  - g. religion;
  - h. maternity;

In addition:

- a. part-time employees should not be treated differently than a comparable full-time employee;
- b. fixed-term employees should not be treated less favourably than a comparable permanent employee;
- c. employees and job applicants should be treated fairly and equally irrespective of their trade union status.

In particular, aim at increasing gender equality by prompting and considering female candidacies for all positions where they should be reasonably available.

- Comply with all applicable national laws and industry standards on working hours.
- Ensure that wages paid for a standard working week shall at least meet legal or industry minimum standards and shall always be sufficient to meet basic needs of our employees and to provide some discretionary income.
- Respect the right of all personnel to form and join trade unions of their choice and to bargain collectively. We will ensure that such employee representatives are not subject to discrimination and that representatives have access to their members in the workplace.
- Develop a diverse, multinational workforce reflective of the diversity of our customers, stakeholders and the countries and communities in which we operate.
- Offer opportunities for flexible working patterns, according to Company's needs, to help employees to combine a career with their domestic responsibilities.
- Provide all reasonable assistance to employees who are or who become disabled, making reasonable adjustments wherever possible to provide continued employment.
- Foster a culture that encourages collaboration, flexibility, and fairness to enable all employees to contribute to their potential and increase retention.



Company will not:

- Tolerate inhumane treatment of employees, including any form of forced labour, physical punishment or other abuse.
- Use child labour. We do not employ persons below the age of 15 or the local minimum employment or mandatory schooling age, whichever is higher.
- Procure goods or services from suppliers known (or reasonably suspected) to use child labour in any manner.

In the case of company operations located in emerging market economies where legislation and enforcement on labour standards and human rights may be less stringent than in our home market, the company may also refer to international principles and good practice standards such as the International Finance Corporation (IFC) Performance Standards, the Universal Declaration of Human Rights and the principles of the United Nations Global Compact.

## **2.2 Responsibility**

The CEO is the main board director with primary responsibility for overseeing the implementation of this Policy and for reporting annually to the Board.

Company, included each division and business unit, will establish appropriate responsibilities, procedures and resources within their operations to ensure that this Policy is fully implemented. These management systems may include, but are not necessarily limited to:

- HR policies and procedures.
- Codes of conduct for employees.
- Disciplinary procedures and grievance mechanisms.
- Procurement policies (including social audits of suppliers judged to be in sectors or geographical regions posing particular risk under this Policy).

## **2.3 Mergers, acquisitions, joint ventures and associates**

Periodically, Company may explore opportunities to acquire companies and to enter into partnerships and joint ventures. As part of the commercial and financial due diligence process of such transactions, employment conditions and labour standards at any company we invest in or acquire, may need to be investigated or assessed to an appropriate level of detail. The focus and depth of such assessments must be decided on a case-by-case basis.

## **2.4 Business interfaces**

On a case-by-case basis, reviews may need to be undertaken on a regular basis to assess the status and performance of third parties who provide services on behalf of Company, including contractors and other regular



counterparties such as suppliers of goods or services that are inherently associated with potentially significant labour standards issues.

## **2.5 Training**

Training will be provided on this Policy and its implementation and will be tailored to the key employment and labour standards issues, risks and opportunities identified by the company. The training programme will encompass induction training for new employees as well as on-going/refresher training where needed.

## **2.6 Reporting**

CEO will ensure that the Board receives appropriate reports and briefings on Employment and Labour Standards, including the following:

### A. Incident reporting

The CEO will notify the Board as soon as possible in the event of:

- any material breaches of this Policy;
- any formal complaints made by employees or legal proceedings instituted against the company in respect of the issues covered by this Policy;
- any negative media articles, stakeholder complaints, consumer campaigns or NGO activity related to labour standards at the company and of such significance that it may affect the company's reputation and brand.

### B. Annual reporting

The CEO will provide the Board with a short annual report on the company's implementation of this Policy. The format and content of this annual report shall be agreed with the Board in advance but at minimum is likely to include:

- confirmation that the company has complied with the Policy during the reporting period or, if this is not the case, information on those aspects of the company's operations where challenges or problems have been encountered, the impact of these issues and details of the corrective action taken and its effectiveness;
- any external developments relevant to this Policy that could be of strategic importance in the near future;
- any suggested changes or improvements to this Policy for Board consideration.

## **2.7 Monitoring and review**

This Policy will be enforced through regular monitoring and review and will form part of the Company's procedures.





## **2.8 Queries**

Should you have any questions regarding this Policy, or the supporting principles please contact:  
[esg@namirial.com](mailto:esg@namirial.com)