

The **Social Responsibility Policy** confirms and reinforces the commitments already expressed by Tunnelpro in the Code of Ethics, in the Company Policies and in the Human Rights Guidelines implemented in order to achieve the highest ethical standards, in compliance with the applicable legal provisions and the United Nations Universal Declaration of Human Rights and the Conventions of the International Labour Organization (ILO).

Tunnelpro is committed to Social Responsibility through the implementation of:

- the **Human Rights Guidelines**, excluding the use of child labour and rejecting the use of forced and compulsory labour;
- the **Health and Safety Policy**, ensuring adequate standards of health, well-being and safety in the workplace;
- the **Human Resources Management Policy**, respecting the right to freedom of association and collective bargaining and the right to a decent wage and fair working hours;
- the **Equality, Diversity and Inclusion (EDI) Policy**, according to the principles of dignity, equality, inclusion and non-discrimination, not tolerating any form of discrimination based on age, ethnic origin, nationality, political and trade union opinions, religious beliefs, sexual orientation, gender identity, physical and mental disabilities and any other personal characteristic not related to the professional sphere;
- the **Policy for Appropriate Behaviour in the Workplace** and the **Guidelines on Human Rights**, prohibiting the application of unfair disciplinary practices and excluding any form of physical, bodily and mental coercion, including verbal insults or any other offence against the dignity of persons;
- the **Sustainable Procurement Policy**, thereby extending these ethical principles to the whole supply chain.

The Policy also represents a formal declaration by the Company Management to operate in compliance with a Social Accountability Management System that conforms to the requirements of the SA8000 standard, introducing an additional control of Social Accountability issues and promoting continuous improvement processes fed by risk assessment and mitigation.

The company is committed to ensuring that the principles of social responsibility are disseminated, understood and respected by workers, business partners, participants in the supply chain and other stakeholders, promoting their involvement and hoping for fruitful and constructive interaction.

Tunnelpro supports the active involvement of workers in the process of continuous improvement of the SA8000 management system, integrating a balanced and transversal representation of the workforce in the Social Performance Team.

Tunnelpro encourages the conscious use of the communication channels available for sending reports of alleged or confirmed violations of the provisions of this policy, ensuring the absence of any discrimination or retaliation against employees and/or other stakeholders who provide comments, recommendations, reports or complaints, without prejudice to legal obligations.

Reports on Social Responsibility issues and requirements can also be sent to the Social Performance Team at the following addresses:

- spt@tunnelpro.it
- postal address: SPT - Tunnelpro S.r.l. Via Poma, 4 | 00195 | Rome | Italy

In case of no response, it is possible to contact the *Certification Body of the SA8000 System* at the following addresses:

- TUV Italia s.r.l. Via Carducci, 125 ed. 23 i-20099 Sesto San Giovanni (MI)
- or by e-mail: tuv.ms@tuv.it

alternatively, the *Accreditation Body for the SA8000 standard* at the following other addresses:

- Social Accountability Accreditation Services (SAAS) 15 West 44th Street, 6th Floor - New York, NY 10036 - USA / tel.: (212) 391.2106 fax: (212) 684.151 .

This policy is sent to all our employees as an essential part of the training process and is made available on the company's intranet and website.

This policy is reviewed annually during the Management System Review.

Paolo Bernardini  
CEO,  
09 November 2022

