SOCIAL POLICY

1. Purpose

This Social Policy defines the principles, commitments and guidelines through which the Italian companies of the Celli Group promote the protection of people, occupational health and safety, skills development, respect for individual dignity, the protection of personal data and, more broadly, fair and safe working conditions that respect fundamental rights. The Policy also sets out the Group's commitment to promoting social dialogue, freedom of association, worker representation and collective bargaining, in accordance with applicable legislation and agreements.
The Policy provides guidance and coordination and applies consistently with the specialist documents of the integrated management system, without replacing them.

2. Scope and applicability

This Policy applies to Celli Group companies based in Italy and, as relevant to each specific provision, to employees, management, contractors, agency workers, interns, visitors and third parties operating at company sites or on behalf of those companies.
Its extension to other Group companies abroad may take place progressively, subject to verification of consistency with their respective local organisational, regulatory and documentary frameworks.

3. Guiding principles

Within the scope of this Policy, the Celli Group undertakes to operate according to the following principles:

- compliance with applicable legislation on employment, health and safety, protection of individuals and personal data protection;
- the centrality of people, individual dignity and responsible listening;
- respect for freedom of association and workers' right to representation and collective bargaining, as well as the promotion of constructive social dialogue with workers' representatives and recognised trade unions;
- risk prevention, continuous improvement and the promotion of safe behaviours;
- enhancement of skills, training and professional growth consistent with organisational needs;
- prevention and combating of discrimination, harassment, offensive conduct or retaliation, consistently with the Code of Ethics, applicable reporting channels and other available organisational safeguards;
- protection of confidentiality and proper processing of personal data;

- progressive integration of social matters into business processes, monitoring and management review.

4. People, employment and professional development

The Celli Group recognises the value of people as an essential factor in process quality, business continuity, innovation and business sustainability.
To this end, the Group undertakes to:

- adopt recruitment and onboarding processes based on role requirements, skills, experience and organisational fit;
- clearly define responsibilities, activities, reporting lines and position requirements through the applicable HR tools;
- provide initial training and, where necessary, on-the-job coaching for operational activities or tasks involving specific risks;
- promote training programmes consistent with roles, organisational needs, mandatory requirements and improvement objectives;
- support professional growth and skills development, within the limits of available processes and tools.

5. Occupational health and safety

The Celli Group regards the protection of occupational health and safety as a primary value and an indispensable prerequisite for carrying out its business activities.
In this area, the Group undertakes to:

- comply with applicable legislation and keep risk assessment and management safeguards up to date;
- prevent injuries, incidents, near misses and occupational diseases through appropriate technical, organisational and procedural measures;
- ensure information, training, instruction, consultation and employee involvement on HSE matters;
- manage emergencies, personal protective equipment, operational controls, internal audits and continuous improvement consistently with applicable specialist documents;
- promote safe behaviour by visitors, contractors and other third parties accessing company sites.

6. Training and awareness

The Celli Group recognises training as an essential driver of safety, quality, compliance and professional growth.
The organisation therefore undertakes to:

- plan and record mandatory training and training required to perform assigned duties;
- ensure operational instruction in production activities and processes involving specific risks or requirements;

- promote awareness of ethical, health and safety and privacy matters and, progressively, other social matters relevant to the Group.

7. Human dignity, inclusion, listening and rights

The Celli Group undertakes to promote a working environment that respects people and individual dignity.
Consistently with the principles of the Code of Ethics and the applicable safeguards, the Group undertakes to:

- not tolerate discrimination, harassment, intimidation, offensive conduct or retaliation;
- foster professional relationships founded on fairness, respect and responsibility;
- ensure, through available channels and safeguards, the possibility of reporting conduct inconsistent with corporate principles, including whistleblowing channels where applicable;
- progressively promote organisational practices attentive to listening to people and respecting fundamental rights, consistently with the evolution of the system.

8. Social dialogue and industrial relations

The Celli Group recognises social dialogue as a key element in fostering fair, transparent and constructive labour relations and in contributing to the responsible management of issues concerning people and the organisation of work.
In compliance with applicable legislation, collective agreements and company-level agreements, where these exist, the Group undertakes to:

- respect freedom of association, the right of workers to elect or appoint their own representatives, and the right to collective bargaining;
- maintain an open and constructive dialogue with workers' representatives and recognised trade unions, in accordance with the roles and procedures laid down by legislation, collective bargaining agreements and applicable company agreements;
- ensure, where applicable, appropriate processes for informing, consulting and involving workers' representatives on matters within their remit;
- to promote the management of trade union dialogue and industrial relations in accordance with the principles of fairness, mutual respect, non-discrimination and the absence of retaliation;
- to monitor, where relevant, factors useful for assessing the effectiveness of social dialogue, such as the coverage of collective bargaining, the presence of workers' representatives and the holding of formalised meetings or consultations.

Quality objective: to maintain and strengthen constructive relationships with employees, their representatives and recognised trade unions over time, ensuring a structured dialogue that complies with the relevant legislation and applicable collective agreements.

9. Privacy and proper handling of information

The Celli Group undertakes to process personal data and other confidential information in compliance with applicable legislation and relevant company procedures.
To this end, within the scope of this Policy, the Group ensures:

- roles, responsibilities and operating instructions for processing personal data;
- appropriate protection of information relating to employees, candidates, customers, suppliers and other data subjects;
- management of data-subject requests, any personal data breaches and retention periods, consistently with applicable privacy safeguards;
- promotion of proper conduct in the use of IT tools and the management of corporate information.

10. Third-party and supply chain engagement

The Celli Group also promotes respect for relevant social principles in its relationships with suppliers, contractors, partners and other third parties.
To this end, where applicable, the Group refers to:

- the principles of the Code of Ethics and the Supplier Code of Conduct;
- the safety and conduct requirements to be observed at company sites;
- supplier assessment and monitoring processes and any audits required in relation to ethical, social and HSE matters.

11. Responsibilities, implementation, monitoring and review

Management promotes the implementation of this Policy and ensures its consistency with corporate guidelines and the integrated management system.
The relevant functions, each within its own area of responsibility (including, by way of example, HR, HSE, Privacy, Facility Management and the Integrated Management System), contribute to its implementation, communication and updating.
Depending on the circumstances, implementation of the Policy is supported by recruitment and training processes, audits, operational controls, reporting management, monitoring of HSE events, privacy management, context analysis and management review.
Monitoring social matters may be progressively strengthened through indicators, documentary evidence and additional organisational safeguards consistent with the evolution of the system.
With specific reference to social dialogue, the HR department oversees relations with employee representatives and trade unions, maintains relevant records (such as agreements, minutes or other documentation relating to discussions) and supports the monitoring of any applicable indicators.
This Policy is reviewed periodically and updated where necessary in response to organisational, regulatory or management-system changes.