

**EFORT-WFC GROUP
SOCIAL RESPONSIBILITY POLICY**

Ed03_2023 - Rev. 00

This policy sets out the principles and behaviours followed and to be followed by Directors, Statutory Auditors, Managers, Employees of the Companies of the EFORT-WFC Group, belonging to EFORT W.F.C. Holding S.p.A. (hereinafter referred to as "Group" or "EFORT-WFC Group" or "EFORT-WFC Group") and in general by all those who work in Italy and abroad in the name and/or on behalf and/or in the interest of the Group, or who have business relations with it.

The Management of this Company (hereinafter referred to as "Company" or "Organization"), as a company belonging to the EFORT-WFC Group (hereinafter referred to as "Group"), is aware of the role played in its economic and social relations, therefore hereby declares to implement a Social Responsibility Policy, in accordance with the national and international standards, in compliance with the Universal Declaration of Human Rights, the Conventions and Principles of the United Nations and the ILO (*International Labour Organisation*)¹ Conventions, in full respect of what contained therein, with regard to the working conditions of the personnel employed, human dignity and workers' freedom, as well as to implement and encourage responsible social behaviour, to manage its business in an ethically correct way and attentive to the expectations of all parties involved in business relations with the companies of the Group.

In this regard, the Company:

- considers its staff to be a valuable and strategic resource: ensuring the protection of their fundamental rights, encouraging and supporting their professional and personal development, creating a healthy and safe working environment;
- condemns violence and all illegal conduct likely to conflict with dignity or physical and/or moral integrity;
- rejects the non-compliance with human rights and fundamental freedoms.

¹ILO Conventions 29 and 105 (Forced and Compulsory Labour); ILO Convention 87 (Freedom of Association); ILO Convention 98 (Right to Collectively Bargain); ILO Conventions 100 and 111 (Equal Remuneration for Men and Women Workers for Work of Equal Value; Discrimination); ILO Convention 135 (Workers' Representatives Convention); ILO Convention 138 and its Recommendation 146 (Minimum Age and Recommendation); ILO Convention 155 and its Recommendation 164 (Occupational Safety and Health); ILO Convention 159 (Vocational Rehabilitation and Employment for

EFORT W.F.C. Holding S.p.A.

Società a Socio Unico

Società sottoposta ad attività di direzione e coordinamento da parte di EFORT Intelligent Equipment Co., Ltd.

P.IVA e C.F. 11348180016 - Numero REA TO -1206236

Capitale Sociale: Euro 10.000.000,00 i.v.

Sede Legale: Corso Duca degli Abruzzi 2, 10128 Torino - Italia

www.efortwfc.com

To achieve these objectives, the Company intends to guarantee, throughout the supply chain of its production process and in the pursuit of his social object, the application and compliance of following requirements and principles, striving according to the following:

1. Child labour

Child labour is unacceptable.

2. Forced or compulsory labour

- We refuse to use forced or compulsory labour and it is forbidden to forcibly withhold original documents of the employee.
- It is forbidden to require the staff to leave cash "deposits" at the beginning of the employment relationship.
- Neither the Company itself, nor any other entity providing labour or services to the Company may withhold part of the salary, allowances, properties or documents of the staff, so as to force them to continue working for the Company.
- The staff have the right to leave their workplace at the end of the regular working day and to terminate the working relationship, giving reasonable notice, in accordance with the applicable legislation.

3. Health and Safety at work

We consider the right to Health and Safety to be fundamental for all workers in their workplace.

All risks to Health and Safety in the workplace are assessed, including through training and awareness-raising courses and activities.

We ensure a safe and healthy working environment, taking effective measures to prevent potential accidents, injuries or illnesses that may occur as a result of/in relation to/during the course of the work. All risks related to Health and Safety at the workplace, for workers who have just given birth, those pregnant and breastfeeding, including risks related to the working tasks shall be assessed, in order to ensure that all reasonable measures are taken to eliminate or reduce any risk to their health and safety.

Disabled Persons); ILO Convention 177 (Home Work); with reference to the United Nations, also the International Covenant on Economic, Social and Cultural Right; International Covenant on Civil and Political Rights; United Nations Convention on the Rights of the Child; United Nations Convention on the Elimination of All Forms of Discrimination Against Women; United Nations Convention on the Elimination of All Forms of Racial Discrimination; United Nations Guiding Principles on Business and Human Rights.

Sede Operativa: Via 1° maggio 8, 10040 Rivalta di Torino (TO) - Italia

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Whenever the Organization is unable to effectively reduce or eliminate the causes of any risk and consistent with the needs, appropriate personal protective equipment is provided to staff at its own expense.

In the event of an accident at work, the Company shall endeavour to provide first aid and to assist the worker or other person injured, to receive the necessary medical treatment.

One or more Heads of the Prevention and Protection Service for the Health and Safety of Workers, as well as Security and First Aid Officers and any other figure that may be provided for by the local legislation, are appointed.

We ensure that all staff is provided with recurrent and effective health and safety training, including instructions on the behaviour to be maintained in relation to the workplace and, where necessary, specific instructions for the task being performed. This training shall be repeated for new workers or workers assigned to new tasks, as well as in the event of accidents or when the technological changes and/or the introduction of new machines involve new risks to the worker's health and safety.

Documented procedures to identify, prevent, reduce, eliminate or, ultimately, address potential risks to health and safety of staff are laid down. The company keeps written records of all accidents occurred in the workplace and in all accommodations and facilities made available by the Organization, regardless of whether those premises are owned, leased or contracted or whether they belong to the contractor.

All staff are guaranteed free access to clean and safety restrooms, drinking water, suitable places to eat meals and, where applicable, hygienically adequate premises for food storage.

Workers are guaranteed the right to leave work in the event of imminent and serious danger without asking for Company's permission.

4. Freedom of Association and the Right to Collective Bargaining

Freedom of association and the right to collective bargaining are recognized.

We support dialogue with trade unions in compliance with the rights and wishes of all staff.

We ensure that staff representatives are not subject to discrimination, harassment, retaliation and can communicate with their members in the workplace.

5. Discrimination

We fight and reject all forms of discrimination and unequal treatment (by way of example but not limited to: when hiring, in carrying out the tasks, in salaries, in accessing training courses, in career advancement, in dismissal) based on race, national, territorial or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, trade union membership, political opinions, age or any other condition that could give rise to discrimination.

We shall not interfere with the exercise of the personal right of staff to follow religious principles and practices, to meet the needs related to the territorial origin, ethnicity, class, national origin, religion, disability, gender, sexual orientation, trade union membership or political affiliation.

We ensure the protection of maternity and paternity, as well as of disadvantaged persons and under no circumstances we shall subject staff to pregnancy or virginity test.

We reject and do not allow any threatening, offensive, exploitative or sexually coercive behaviour, including gestures, language and physical contact in the workplaces and in all accommodation and other facilities made available by the Company, regardless of whether such premises are owned, rented or contracted or whether they belong to the contractor.

6. Disciplinary actions

Staff is treated with dignity and respect.

The use, incitement and/or support of corporal punishment, mental, psychological, or physical coercion, verbal abuse, harassment, harsh or inhumane treatment, as well as activities that put life and dignity of individuals at risk, are banned.

7. Working hours

We comply with the laws in force, provided for by the collective bargaining and the standards of the sector on the subject of work hours, holidays, rest periods and public holidays. We ensure that the number of weekly hours, established by the contract, are not exceeded. We respect the rest day and the overtime on a voluntary or negotiating basis.

8. Compensation

We ensure a regular and punctual compensation, in accordance with the applicable laws and/or the national collective agreement, as well as overtime

and deductions. The remuneration shall be paid on the scheduled deadline and in a manner that cannot limit workers' freedom to use their salary.

We ensure that the structure of workers' salaries and allowances is clearly and regularly detailed in writing for each pay period.

We ensure that salaries and allowances are paid in accordance with the law and conveniently for workers, but under no circumstances delayed or limited with methods, such as vouchers, coupons or promissory notes.

We do not use contractual forms or false or instrumental schemes, aimed at avoiding compliance with the obligations laid down by the legislation and the applicable labour and social security regulations with regard to staff.

9. Privacy and personal Data Protection

EFORT W.F.C. Holding S.p.A. acknowledges how important it is to guarantee proper protection to those interested in the personal data processing operations by those belonging and or relating to the Group, during their business activities.

With this Policy, EFORT W.F.C. Holding S.p.A. intends to provide to Directors, employees and all those who represent the company to third parties, information regarding the basic principles of conduct to be followed as part of the processing carried out.

The processing of personal data shall comply with the following principles and general rules:

- lawfulness, fairness, and transparency;
- exactness of purposes;
- necessity and proportionality;
- reasonable duration;
- disclosure and consent.
- access rights of the interested parties;
- security.

The abovementioned principles and rules might be outlined and adapted to each local situation, in compliance with local rules and regulations.

10. Management system

This *Policy* and procedures to regulate the business activities are disseminated in Italian and in all other necessary languages, so as to allow all staff to understand their content.

The national collective agreement is applied in a complete and impartial way to all employees, by remitting the established salary on time and all the related social security, welfare and insurance contributions.

We encourage dialogue between workers and their Managers and the Head of Human Resources.

Safety conditions and physical and mental well-being of our employees are promoted and improved through both preventive and corrective actions.

Suggestions from individuals and all interested parties are welcomed with a view to continuous improvement.

Audit procedures are carried out on our suppliers and subcontractors, considering them important resources both in getting the quality of services provided and in achieving the social equity goals.

Methods and contacts to make complaints in a confidential, impartial, non-retaliatory, accessible and available manner to staff and to the interested parties are provided, so that comments, recommendations, reports or complaints regarding the workplace and/or non-conformities can be expressed respecting the rights of individuals and community.

We ensure a transparent communication system with all stakeholders, which allows easy access to information on the services provided, on the moral correctness and quality of our offer, also using certified quality standards.

We apply the necessary diligence to verify the compliance of our suppliers/subcontractors, private employment agencies and sub-suppliers, consultants, also when new ones are selected.

We assess the significant risks of non-compliance by suppliers/subcontractors, private employment agencies and sub-suppliers and consultants; reasonable efforts are made to ensure that these significant risks are adequately addressed by suppliers/subcontractors, private employment agencies, sub-suppliers, consultants and by the Company itself, as appropriate, setting out the priorities, according to our possibilities and resources to influence those subjects.

We define monitoring and archiving activities of the performance of suppliers/subcontractors, private employment agencies and sub-suppliers, in order to ensure effective risk management.

11. Fair Dealing

The Company carries out its business activities fairly and in full compliance with the principles of the law on competition. Therefore, any conduct in breach of professional fairness, collusive, predatory, abuse of dominant position or economic reliance and any other conduct aimed to alter the market fairness and competitive balance is not allowed.

12. Anti-corruption, honesty and transparency.

Carrying out its professional activities, the EFORT-WFC Group requires loyalty and good faith behaviour, as well as the fulfilment of contractual obligations and services required, in compliance with the rules and instructions set out.

Ethically responsible conduct based on fairness, honesty and transparency is one of the EFORT-WFC Group's key success factors.

We firmly believe that it is our responsibility to comply with the rules of the countries in which we do business, standing out as a company able to promote the values that shape our actions in the countries in where we work.

Fighting corruption, rejecting it in any context, in any form or manner, is a concrete commitment for the EFORT-WFC Group.

Being aware of corruption risks and leading by example is a key element of our daily commitment to protect our strongest asset: our integrity. The EFORT-WFC Group is committed to promoting ethical and responsible business conduct in compliance with the laws, regulations, standards and guidelines applicable to business in the countries where it operates.

The EFORT-WFC Group has adopted the United Nations Global Compact and Transparency International's Business Principles, which commit companies to fight corruption in all its forms, including extortion and bribery.

The EFORT-WFC Group believes that the application and pursuit of the principles and information contained in this Policy will help ensure that present and future generations enjoy the best conditions and tools for a better quality of life.

EFORT-WFC Group General Management

Efort W.F.C. Holding S.p.A.

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