

Engineering

Technical gases



Healthcare

LPG and Natural Gas

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GENERAL PRINCIPLES

SIAD Group adheres to and promotes the following United Nations principles within its organization.

1. Companies should support and respect the protection of internationally proclaimed human rights and ensure that they are not complicit in human rights abuse.
2. Companies should uphold freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced and compulsory labor; the effective abolition of child labor; and the elimination of discrimination in respect of employment and occupation.

SCOPE OF APPLICATION

This document is applicable to all Group SIAD Companies.

PRINCIPLES AND POLITICS OF THE SIAD GROUP

The following are the guiding principles and policies of the SIAD Group. This list does not replace any procedural guidelines or practices currently in place and still in force.

Health and Safety in the workplace

In SIAD Group, the Health and Safety of all employees and staff working in Group companies is a priority. The guidelines for Health and Safety in the workplace are as follows:

- All sites will work to comply with the principles of ISO 45001.
- All sites must carry out a health and safety risk analysis in accordance with local laws and implement all necessary measures to minimize the risks identified.
- Training plays a key role as a measure to prevent risks.
- All sites must apply the provisions of the SIAD Group's Code of Ethics regarding health and safety in the workplace

The goal for all Group companies is to end the year with zero accidents

Working conditions

All workers must be guaranteed at least the working conditions provided for by local labor regulations (relevant collective agreement, labor codes, etc.).

Dialogue with workers' representatives on the "working conditions" must be guaranteed, and any supplementary agreements to the collective agreement may be formalized in second-level agreements.

Working conditions refer to at least the following issues:

- Regular and overtime working hours
- Remuneration
- Benefits
- Work-life balance

Individual employment contracts will set out the main terms and conditions of employment agreed with the employee. Second-level agreements, which may regulate additional terms and conditions of employment, will be made available to the employee concerned.

Minimum wage

SIAD Group guarantees 100% of its employees and temporary workers operating in all companies a salary that is not less than the minimum wage.

Salaries must be paid monthly, on the defined days in accordance with local regulations and/or individual employment contracts.

The minimum wage is calculated according to the Anker & Anker 2017 methodology and takes as a reference the wage referring to a typical family described as follows:

Typical family: *Accounts for 1 + country employment rate working parents and uses the national fertility rate for the number of children.* (**Typical family:** family household consisting of a number of workers and a number of children calculated on the basis of the average employment rate and average number of children in the reference country). The reference data are taken from the most recent estimates available on the website: www.valuingimpact.com.

Career Management

All SIAD Group companies manage the careers of their employees based on criteria guided by principles of transparency, merit, and the absence of any type of discrimination, promoting diversity, equity, and inclusion. These are the main criteria and tools provided:

- During the recruitment and hiring process, only the technical and cross-disciplinary skills of each candidate are considered. No form of discrimination based on gender, sexual or political orientation, ethnicity, geographical origin, age or any other discrimination factor is permitted.
- During the initial induction phase, all the technical, cross-disciplinary, and safety training necessary to perform the assigned job is provided.
- At the end of any trial period, the manager will carry out an assessment based on factors that are as objective possible in order to determine whether the candidate has succeeded.
- Each manager will conduct an annual performance review of their employees and hold a meeting with them to define any improvement actions or objectives for the following year, as well as to identify any training needs (except those required by law). The annual reviews will be managed through the existing performance management system in coordination with the Group Human Resources Department.
- Career promotions, awards and bonuses must be based on merit and free from discrimination (automatic promotions provided for in collective agreements or second-level agreements must be guaranteed).
- All workers may resign without restriction, except as provided for in applicable contracts.
- Workers may only be dismissed in accordance with the rules of the applicable contract.

The Group Human Resources Department ensures that all career advancement requests are evaluated in order to exclude any discriminatory acts, also ensuring careful evaluation of all resignation or dismissal requests to exclude any discriminatory acts. The Group's human resources management process is subject to regular audits by the supervisory body of SIAD SpA.

Any form of harassment in the workplace and also outside of the workplace is strictly prohibited.

Any form of discrimination or harassment can be reported by all Group employees through the Whistleblowing tool, which guarantees the privacy of the person making the report.

Social Dialogue

SIAD Group is committed to respecting workers' trade union rights and avoiding any form of discrimination or retaliation against workers' representatives.

The SIAD Group encourages dialogue with workers' representatives.

This dialogue takes place through trade unions, where present, and/or with formally elected workers' representatives.

Any request made by an individual worker must, however, be assessed by their manager and, if necessary, submitted to the attention of the Group's Human Resources Department.

Child and youth labor

No form of employment is permitted at Group companies for people younger than 18. This also applies to temporary workers and contractors working at Group sites.

The General Managers of all Group companies ensure that all hiring complies with the principle in collaboration with the relevant Human Resource Manager involved in the selection/hiring process.

The verification of contractor workers is the responsibility of the company representative who commissioned the work.

Force and mandatory labor

No form of forced and/or mandatory labor is permitted:

- All workers are free to leave their workplace after the agreed working hours.
- All workers may leave their workplace during the agreed working hours upon specific requests for leave that have been authorized in advance.
- The company undertakes to always comply with the rules on workers' leave and holidays provided for by labor legislation and applicable contracts.
- Overtime must be requested in accordance with labor legislation and applicable contracts
- No original identity documents belonging to workers may be retained by the company
- It is not permitted to grant loans to employees outside the terms regulated by applicable local laws.

Human rights of the external stakeholders

SIAD Group has not identified any situations in which the human rights of external stakeholders (such as property/land rights, rights to self-determination, rights to security) may be infringed.

In any case, the SIAD Group is always attentive and open to dialogue with local communities in areas where it owns sites, with a view to assessing all requests in terms of rights and defining any improvement actions with the communities themselves.

Reporting mechanisms

Tutte le parti interessate, interne ed esterne, possono segnalare violazioni o presunte violazioni alla presente politica tramite lo strumento di Whistleblowing facilmente accessibile a tutti i lavoratori.

All internal and external stakeholders can report violations or suspected violations of this policy by using the whistleblowing tool, which is easily accessible to all employees.

The Group guarantees that there will be no retaliation against anyone who uses the complaint mechanism. The whistleblowing system guarantees confidentiality and protection for the whistleblower.

Remedial mechanisms

In the event that situations are identified or reported as violating the principles and policies of this document, for example (non-exhaustive list):

- workers below the subsistence wage;
- presence of child, forced and/or compulsory labor;
- working conditions not in line with applicable contracts;

all possible remedial actions must be taken, including, for example (non-exhaustive list):

- review of employment conditions;
- support for the families of child workers to reintegrate them into education;
- awareness-raising and training for workers and their manager;
- other actions to be mutually agreed with the worker concerned.

These actions must be documented, implemented within the specified time frame, and verified.

The actions identified must be communicated to employee representatives.

A record of the corrective actions implemented must be kept (the non-compliance register provided for by the Group Head's quality management system may be used).

Corrective actions must be monitored over time to verify their effectiveness.

Principles and Policies monitoring

Compliance with the principles and policies outlined in this document is monitored during internal audits conducted by the Company Management Systems, including through workplace inspections and interviews with employees.

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