

Corporate Ethics Policy

The purpose of this Policy is to provide fundamental principles and general guidelines, both short-term and long-term, regarding the social and ethical responsibility of Nuova Sima Srl.

With this in mind, the company management declares its full commitment to adopting a system of social awareness that corresponds to an efficient organizational model, which places the individual at the center, both as a person and as a worker, protecting them and seeking the most appropriate management methods.

The Company Management is directly committed to establishing, implementing, maintaining, and improving all necessary social responsibility measures within its structure, in order to ensure constant compliance with the fundamental principles set forth herein.

This commitment translates into compliance with the following requirements:

1. Combating child labor:

Only workers over the age of 18 and not subject to compulsory education are employed in the company.

2. Combating forced labor:

- Under no circumstances do we require hired personnel to leave cash deposits or original identity documents.
- We do not use cameras or surveillance to monitor workers in the performance of their duties.
- We reject any form of coercion against staff. We refuse any form of contract that violates or circumvents legal obligations.

3. Health and safety for workers:

Safety plays a central role in our business activities, and it is our duty to ensure high safety standards. For this reason, the company is committed to:

- complying with the obligations imposed by workplace health and safety legislation;
- providing regular training to all staff and supplying information material;
- providing all workers with personal protective equipment free of charge;
- appointing emergency team members (first aid and firefighting);
- establishing contractual relationships with qualified companies for maintenance work.

4. Promoting collective bargaining:

- We respect the right of workers to join and form unions of their choice and the right to collective bargaining.
- We ensure that union representatives are not discriminated against in the workplace and that they can communicate with their members.

5. Combating discrimination:

- Discrimination on the basis of ethnic or national origin, social class, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political opinion, age, or any other condition that could lead to discrimination is not permitted. Workers must be treated with respect and dignity and must not be subjected to harassment or abuse of a physical, sexual, psychological, or verbal nature.

6. Disciplinary procedures

- Corporal punishment, mental or physical punishment, verbal abuse, and workplace bullying cannot be used or encouraged.

7. Compliance with working hours as stipulated by applicable laws, industry standards, and collective bargaining agreements.

8. Support for fair pay:

Ensure compliance with statutory minimum wages, so that wages meet basic needs and a portion of income remains available for other purposes; ensuring that wage deductions are not made for disciplinary purposes and that pay slips are clear and understandable to all; ensuring that wages are paid in accordance with legal requirements and in the manner most convenient for workers.

REPORTS

Where workers, either individually or organized in their trade union representatives, believe that one or more of the above principles have not been applied consistently, or believe that there are issues that may contravene these principles, they may submit a formal complaint by email or certified email (nuovasima@pec.nuovasima.it).

Genga, 11 September 2025

Nuova Sima Srl

