

POL-960

SOCIAL ACCOUNTABILITY POLICY

POLICY

IDENTIFICATION

Category:	SA - Social Accountability		
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RESPONSIBILITIES

	Name	Position
Processed by:	Felice Molinari	Compliance Officer
Verified by:	Francesca Merella Cristina Rossato	Chief Human Resources Officer Chief Compliance Officer
Approved by:	Giuseppe Di Franco	Chief Executive Officer

CLASSIFICATION

Public

SUMMARY OF CHANGES

Ver.	Date	Description of Changes
00	27/05/2024	First issue
01	10/09/2025	Integration with others management systems (UNI PdR 125)

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1 PURPOSE AND SCOPE OF APPLICATION

This Policy represents the company's commitment to Social Accountability, in accordance with the SA8000:2014 standard, and thus aims to provide fundamental principles and high-level, short- and long-term generic guidelines regarding social accountability, in accordance with the SA8000 standard.

These fundamental principles and high-level generic guidelines help managers, employees, suppliers, clients and stakeholders better understand how the Company's activities are aimed, at all times, at safeguarding its workforce and all workers who may be affected by its activities, because the employees and workers with whom the Company works deserve to feel safe, valued, and able to express themselves.

The Company does not discriminate on the basis of gender, age, race, sexual orientation, gender, or ethnicity.

The Company promotes initiatives and is committed to projects to foster an active culture of inclusion, encouraging all employees to make their contribution.

In this context, senior management has undertaken to operate in keeping with the principles put forward in the SA8000 standard by adopting transparent procedures and systems aimed at identifying and meeting the expectations of stakeholders, such as employees, clients and suppliers.

In recent years, events that have occurred have prompted the Company to encourage working from home safely and efficiently by supporting remote collaboration.

This Policy is developed and based, wherever possible, on the coexistence of the others company policies for the Diversity, Equity and Inclusion, Environment, Health and Safety Management System, the Code of Ethics, and the Organization and Management Model pursuant to Italian Legislative Decree 231/2001 adopted by the Company and approved by the Board of Directors.

This Policy applies to all employees of Lutech S.p.A., employees of Lutech Group subsidiaries, consultants, suppliers/subcontractors, and all other business associates.

In order to give it as much exposure as possible, the Policy is made public and disclosed in the following manner:

TARGET GROUP	DISTRIBUTION
All Lutech employees	Company SharePoint Intranet
Suppliers and Business Associates	Supplier Qualification Portal
Clients	Internet - corporate website

2 DEFINITIONS AND ABBREVIATIONS

The following abbreviations are used within the document.

TERM/ACRONYM	DEFINITION
BoD	Board of Directors
SPT	Social Performance Team

3 SOCIAL ACCOUNTABILITY

3.1 Introduction

Lutech S.p.A. (hereinafter referred to as the Company) is a leader in digital transformation.

The Company designs, implements, and manages digital solutions in which Digital, Cloud, Cybersecurity and Managed Services are integrated, providing end-to-end solutions for all industries that put clients' needs at the center and help them achieve their goals.

The Company's mission is to help its clients build the future in information technology. With its experience and services, the Company supports the development of public and private enterprises, organizations and corporations and contributes to scientific and technological excellence. The Company enables its clients, employees, working associates and enterprises in general to live, work, and advance in information technology in a sustainable and secure manner.

The Company represents the mission and the pursuit of the objectives of the Lutech Group in Italy, present throughout the territory in a number of locations, among which we draw particular attention to the HQ located in Milan and the larger offices located in Rome, Naples and Bari.

3.2 Our commitment

With SA8000 certification and the continuous improvement project associated with it, management has given the following formal undertakings:

- ❑ to adhere to national, EU and international laws on labor and workers' rights by complying with the provisions contained in official documents and their interpretations;
- ❑ to continue to satisfy social accountability requirements in the future and adapt to any new requirements that may be laid down;
- ❑ to ensure periodic monitoring and continuous improvement of the management system adopted by setting specific improvement goals and verifying their achievement, also with the use of a set of important indicators;

- ❑ to ensure that all personnel receive adequate training and information on ethics and social accountability;
- ❑ to raise suppliers' awareness of the social accountability principles set out in the SA8000 standard;
- ❑ to carry out first-party audits designed to ascertain compliance with social requirements, then take any necessary corrective and preventive actions;
- ❑ to document and communicate to stakeholders the commitment to corporate social accountability, also by drawing up the Social Accountability Report.

The consistency of the social accountability Policy with current business strategies is evaluated by the management and periodically reviewed to ensure that it is consistent with Company logics.

The adequacy and effectiveness of the SA8000 System over time are ensured by independent third-party audits.

The SA8000 Management Representative and the Workers' Representative for SA8000 have been appointed.

The Social Performance Team (SPT) was set up as the body responsible for implementing and monitoring the SA8000 Management System. The SPT ensures adequate exchange of information and cooperation with the team in charge of maintaining the Company's Integrated Environment Health and Safety System and with the Supervisory Board appointed pursuant to Italian Legislative Decree 231/2001.

Finally, the Company has implemented a Gender Equality Management System in compliance with UNI PdR 125, committing to promoting the principles of inclusion, equity, and valorization of diversity in all phases of the employment relationship within the Company.

4 POLICIES AND PRINCIPLES

The entire Management team at the Company verifies and ensures continuous compliance with the basic requirements of SA8000. The Company has long established and adopted a Code of Ethics in compliance with these basic requirements.

4.1 Child labor

The SA8000 requirement: *[the organization shall] not engage in or support the use of child labor; procedures must be established for the remediation of children who have been used as laborers, in particular by providing support to enable such children to attend school; procedures must be established to promote school attendance; children must not be exposed to hazardous situations.*

The Company's commitment: special procedures have been planned and implemented to ensure that:

- ❑ no employee under the age of 16 is hired;
- ❑ knowledge of its ethics policy is disseminated to both workers and all stakeholders;

- ❑ suppliers are monitored to ensure that this requirement is also seen as an unavoidable commitment on their part.

4.2 Forced or compulsory labor

The SA8000 requirement: *[the organization shall] not engage in or support the use of forced or compulsory labor; in particular, personnel, when recruited, shall not be required to pay deposits.*

The Company's commitment: no deposits, in cash or original identification papers, are required from hired personnel.

No use is made of cameras or surveillance that implements forms of control over workers in the performance of their duties.

Any form of coercion against personnel is considered unacceptable.

It is ensured that these rules also apply to any temporary workers connected to employment agencies.

The Company has established and effectively maintains an Organization, Management and Control Model in accordance with Italian Legislative Decree 231/2001, supervised by the relevant Supervisory Board set up for this purpose, which is also responsible for overseeing the predicate offense of crimes against the individual.

4.3 Health and Safety

The SA8000 requirement: *A safe and healthy workplace environment must be guaranteed; a management representative shall be appointed responsible for safety and accident prevention; adequate training must be provided to all personnel and potential health and safety risks must be identified and addressed.*

The Company's commitment: attention to compliance of workplace environments and working activities is constantly monitored by specific personnel.

The Company meets all legislative health and safety standards, starting with Italian Legislative Decree 81/2008 as amended.

The Company has defined and effectively maintains an Organization, Management and Control Model in accordance with Italian Legislative Decree 231/2001, supervised by the relevant Supervisory Board set up for this purpose, which is also responsible for overseeing the predicate offense of manslaughter or serious or very serious injury in violation of the regulations on the protection of health and safety at work.

The Company has and effectively maintains a Safety and Health Management System in accordance with the international standard ISO 45001.

4.4 Freedom of association and the right to collective bargaining

The SA8000 requirement: *All workers shall have the right to form and join trade unions of their choice; they are entitled to collective bargaining; workers' representatives cannot be discriminated against in the*

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workplace and must have access to their members; where rights of association are restricted by law they should be facilitated through the use of alternative means.

The Company's commitment: All workers are guaranteed:

- respect for union rights;
- the prevention of any form of discrimination against union members or representatives.

In Safety and Health, workers have their own specific Health and Safety Representatives.

Workers are assigned their own representatives under the provisions of SA8000.

4.5 Discrimination

The SA8000 requirement: *[the organization shall] not engage in discrimination based on gender, race, national or territorial or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political opinions, age or any other condition that could give rise to discrimination; behavior that is threatening, abusive, exploitative or sexually coercive, including gestures, language and physical contact is not permitted.*

The **Company's commitment:** Personnel are recruited on the basis of competence, experience and education.

Salaries are calculated according to the duties performed, applying National Collective Labor Agreements (CCNL).

Training and development are guaranteed to all; career advancement is based on the abilities of individual workers and the company's organizational needs.

Personnel are dismissed exclusively in circumstances permitted by law.

4.6 Disciplinary Practices

The SA8000 requirement: *[the organization shall] not engage in or tolerate the use of corporal punishment, mental or physical coercion or verbal abuse.*

The Company's commitment: All disciplinary practices not provided for in the National Collective Labor Agreement (CCNL) and the WORKERS' BILL OF RIGHTS are rejected.

If unavoidable, we simply apply the disciplinary sanctions envisaged in the National Collective Labor Agreement (CCNL) in order to maintain rules of proper conduct toward clients, colleagues and management.

4.7 Working hours

The SA8000 requirement: *Working hours must comply with current laws and standards in the working sector; where national legislation is less restrictive than the SA8000 standard, the normal working week shall not exceed 40 hours with one day off; overtime shall not exceed 12 hours per week; overtime must be*

voluntary and paid at a higher rate; when workers are party to collective bargaining agreements, the request for overtime must comply with those agreements.

The **Company's commitment:** The working hours established by the National Collective Labor Agreements (CCNL) and any second-level agreements shall apply. Overtime is paid at an increased rate, as stipulated in the relevant National Collective Labor Agreements (CCNL). Days off are guaranteed.

4.8 Remuneration

The SA8000 requirement: *Legal minimum wages must be guaranteed; wages shall be sufficient to meet the basic needs of personnel and to provide some discretionary income; pay slips must be clearly and regularly detailed; the procedure adopted to deliver wages must satisfy legal requirements and must be convenient to the worker; workers must not be exploited by drawing up contracts for freelance work coordinated by the employer permitting it to avoid meeting its pay obligations towards workers; false apprenticeship schemes must not be applied.*

The **Company's commitment:** Employees are guaranteed salaries corresponding to National Collective Labor Agreement (CCNL) levels. A pay slip with a description of the items making up the pay is duly provided.

Advice is given on how to apply for family allowances.

It is ensured that every form of contract used is managed correctly.

5 COMPLAINTS

In order to keep the System active and have a socially responsible Organization, the active participation of all workers and stakeholders involved is essential.

Where workers, either individually or organized in the unions representing them, feel that one or more of the principles of SA8000 have not been consistently applied, or feel that there are issues that may have an effect on SA8000 compliance, they may send a formal complaint using the channels below.

The complaint can be sent via the following channels:

- by email to their SA8000 representatives
- to the Head of the SA8000 Management System
- to SPT members via the address SPT@lutech.it

It is also pointed out that the complaint can also be sent by all interested parties, including workers, to:

- CISE Certification Body by writing to info@ciseonweb.it
- SAAS - email: saas@saasaccreditation.org

Issues can also be reported using the following portal:

- [Lutech Group Whistleblowing Portal](#)

REFERENCES AND SUPPORTING DOCUMENTATION

REFERENCES

MRS-000	Social Accountability Management System Manual
PSQ-000s	SPT organizational structure and regulations
MOG-001	Code of Ethics
SA8000 - 2014	Social Accountability Standard
POL-970	Politica per la Diversità, Equità e Inclusione (DE&I)
