

SA8000 POLICY

1. SCOPE AND OBJECTIVE

This policy is applicable worldwide to all directors and employees, whether full time or part time, permanent or temporary, working under a contract or on a freelance basis (Personnel) of SIDRA. In addition, any Third Party that we do business with should also respect and act according to our values and ethical principles. The core values of SIDRA guide the way of working with each other, with business partners and with communities.

DEME's Code of Ethics & Business Integrity (https://www.deme-group.com/sites/default/files/2020-02/DEME%20code%20of%20ethics_1.pdf) demands that our business shall always be conducted with respect, integrity and in compliance with all applicable laws and regulations. SIDRA wants all of its business partners to adhere to the same principles which also safeguards SIDRA and DEME's reputation.

This policy sets out the basic principles on human rights topics.

2. GENERAL POLICY ON SA8000 INCLUDING LABOUR RIGHTS

Respect for the human rights of every individual is key for SIDRA and at the heart of our core values. We respect and protect human rights and ensure that we do not exploit anyone, wherever we work in the world. Everybody we do business with must uphold the same standards. We will never tolerate slavery, child labour, forced or compulsory labour or human trafficking. We respect the fundamental rights and freedoms as declared in the United Nations Universal Declaration of Human Rights.

The following policy points are extrapolated directly from the DEME Human Rights policy (rif. "DEME-HRD-POL-009") and are the core values of this group. These are overseen by the DEME Compliance office and the SIDRA Social Performance Team (in short SPT).

2.1 Equal opportunities and hiring practices

SIDRA is an equal opportunity employer. We make sure that all of our Personnel have equal opportunities when it comes to recruitment, career development, training and rewards. We believe it is crucial to create an inclusive culture where every individual can thrive.

Our recruitment selection process is based on merit, so all applicants with the desired qualification and experience will be considered for the open position. The successful applicant will be the person who best meets the specific requirements of the position offered.

Qualifications, performance, skills and experience are the basis for development, training, compensation and career advancement. We do not tolerate unfair treatment of any kind.

2.2 Child labour

We are committed to abiding by the relevant laws and regulations on the minimum working age in all of the countries where we provide employment. We prohibit the hiring of individuals who are under the age of 18 years for positions, including internships, in which hazardous work is required.

Therefore, we will ensure that:

- At the time of hiring, the age of all Personnel (permanent or not) is checked.
- In case of any doubt about the age, no employment will be offered.
- In the event of an occurrence of child labour being discovered, the relevant manager must be informed immediately, and action must be taken without delay to correct the situation. It is the obligation of employees and managers to report child labour activities that they witness or presume, or that are reported to them.

2.3 Forced labour

We prohibit the use of forced labour, defined as work or services extracted from a person under threat or penalty, which includes penal sanctions and the loss of rights and privileges, where the person has not offered him or herself voluntarily. It includes slavery and abduction, misuse of public and prison works, forced recruitment, debt bondage and domestic workers under forced labour situations, and internal or international trafficking.

We must always make sure that:

- all Personnel are informed of the terms of their employment i.e. job description, hours of work etc;
- we ensure that employees work voluntarily and that they do not engage in or support the use of forced labour;
- personnel shall be free to terminate their employment as long as they have given the correct legal notice to their employer;
- we shall not engage in or support human trafficking.

2.4 Work hours, wages and benefits

We assess performance against job requirements and consider business conditions and appropriate market comparisons to deliver compensation. We will compensate employees with wages and benefits that meet or exceed the legally required minimum without delay and will clearly communicate to all employees the earnings due to them.

Furthermore, compensation paid to workers shall comply with the applicable law relating to overtime hours and legally mandated benefits.

All use of temporary, dispatch and outsourced labour will be in line with the local law and SA8000 guidelines.

2.5 Freedom of association and the right to collective bargaining

We recognise the role of lawful and independent workers and employee representative organisations in creating a constructive working environment. Where employees are represented by legally recognised unions or by an alternative recognised employee body, we are committed to establishing a constructive dialogue with their freely chosen representatives.

We will bargain in good faith with such representatives.

2.6 A safe and healthy workplace

The safety and health of our Personnel is of paramount importance and our first priority at all times. Our policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements. We work to provide and maintain a safe, healthy and productive workplace, in consultation with our Personnel and/or their representatives, by addressing and remediating identified risks of accidents, injury and health impacts.

2.7 Workplace security

We are committed to maintaining a workplace that is free from violence, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for Personnel are provided as needed and are maintained with respect for their privacy and dignity.

2.8 Discrimination, harassment and disciplinary measures

We expect our Personnel to treat others with respect and avoid situations that may be perceived as inappropriate. Feedback, criticism and confrontation must always be delivered in an appropriate and respectful manner, taking into account cultural sensitivities, as what is acceptable in one culture may not be in another. Freedom from discrimination is a fundamental human right. Workers should not be discriminated against based on their gender, age, race, religion, or any other characteristics that do not pertain directly to their work performance. We are committed to SIDRA's workplace being free of harassment, including sexual harassment and abuse.

We see this behaviour, as well as any possible retaliation against a person who has made a complaint or given information regarding possible violations of this human rights policy, as unwanted, unwelcome and offensive and will not tolerate it.

Charges of discrimination, harassment or abuse, where substantiated, will result in disciplinary action which can take the form of a severe warning or dismissal depending on the situation and on the judgement of our Corporate HR Department and the SPT, and may also lead to legal action. As well as this, false and malicious accusations with regard to discrimination, harassment or abuse, where substantiated, will result in disciplinary action which could include dismissal. This will be decided by our Corporate HR Department and the SPT and may also lead to legal action.

3. SA8000 MANAGEMENT SYSTEM

SIDRA has implemented a SA8000 management system, in order to further monitor social responsibility issues, promoting continuous improvement processes fuelled by risk assessment and mitigation.

The company is committed to ensuring that the social responsibility principles of the Standard are disseminated, understood and respected by workers, supply chain members and other interested parties, promoting their involvement and hoping for a profitable and constructive interaction.

All employees are informed that complaints should be sent to the SPT (segnalazioneSA8000-unipdr125@deme-group.com) but can also be addressed to the SA8000 system certifier (RINA) and to SAI at the following addresses (- SA8000@rina.org; - saas@saasaccreditation.org)

In Roma

Società Italiana Dragaggi S.p.A.

Il Presidente

Jan Albert Vandenbroeck

