

SA8000 – SOCIAL RESPONSIBILITY POLICY

Progold S.p.A., aware of the importance of social responsibility in the global context, fully integrates the principles of the SA8000:2026 Standard into its Management System, recognizing the value of people, respect for human rights, and the promotion of an ethical, safe, and inclusive working environment.

The Company's social responsibility is based on transparency, participation, integrity, and continuous improvement, with the awareness that sustainable growth can develop only in a context of fairness, respect for diversity, and protection of human dignity.

Progold creates value through the involvement of workers, communities, and stakeholders, adopting responsible behaviors throughout the supply chain.

GENERAL PRINCIPLES

Progold is committed to:

- fully complying with national laws, international labor regulations, and ILO Conventions;
- ensuring fair, safe working conditions that respect the individual;
- preventing any form of abuse, exploitation, discrimination, retaliation, or violation of fundamental rights;
- promoting a culture based on respect, collaboration, fairness, and shared responsibility;
- engaging workers, representatives, the SPT, and stakeholders in a structured manner in decision-making and improvement processes.

SPECIFIC COMMITMENTS

1. Prohibition of child labor

- any employment of workers below the legal age is prohibited;
- the Company systematically verifies age at hiring through identity documents;
- in the event of a risk in the supply chain, a remediation process aimed at protecting the child is activated;
- Progold promotes education, training, and growth opportunities for authorized young workers.

2. Prohibition of forced and coercive labor

- no worker is subject to any form of forced labor, servitude, physical coercion, or psychological coercion;
- no documents, deposits, or sums of money are withheld;
- workers are free to leave their employment in compliance with contractual terms and may refuse non-voluntary overtime.

3. Occupational health and safety

- Progold guarantees a safe and healthy environment by applying its OH&S management system compliant with ISO 45001;
- risks are assessed and systematically updated, including work-related stress and psychological well-being;
- training, instruction, PPE, health surveillance, and worker consultation are fundamental elements of the prevention system.



4. Freedom of association and collective bargaining

- Progold fully protects the right of workers to join trade unions, elect their own representatives, and participate in collective bargaining;
- any pressure, discrimination, or retaliation against those exercising these rights is prohibited.

5. Prohibition of discrimination

The Company ensures equal dignity and opportunity, prohibiting discrimination based on:

- gender, gender identity, sexual orientation;
- ethnic, national, or social origin;
- religion or personal beliefs;
- political or other opinions;
- disability or health conditions;
- age, marital status, or any other personal or social condition.

All decisions relating to hiring, training, remuneration, promotions, and terminations are made on the basis of objective and professional criteria.

6. Respect and dignity

- Progold prohibits any form of physical, verbal, sexual, or psychological abuse;
- no intimidating, humiliating, or harassing behavior toward workers is tolerated.

7. Working conditions, remuneration, and living wage

- Progold guarantees fair, transparent remuneration in compliance with the National Collective Bargaining Agreement for the Metalworking Industry and supplementary company agreements;
- overtime is regulated, voluntary, traceable, and paid in accordance with contractual provisions;
- the Company periodically monitors and assesses the level of a decent wage (living wage) using tools recognized by SAI;
- workers receive clear and transparent information on the composition of their remuneration.

8. Working hours

- working hours comply with national legislation and the collective bargaining agreement;
- at least one day of rest is guaranteed every seven days;
- overtime is voluntary, limited, and documented.

9. Protection of vulnerable workers and privacy

- Progold gives particular attention to the protection of workers in vulnerable conditions, including migrant, agency, fixed-term, and part-time workers;
- personal data are processed in compliance with the GDPR, ensuring confidentiality, minimization, and security;
- any technological monitoring respects worker dignity and is communicated transparently.

SA8000 MANAGEMENT SYSTEM

Leadership, responsibility, and integration (M1–M4)

- Management assumes full responsibility for the SA8000 System;
- the ethical policy is integrated into company strategies and decision-making processes;
- adequate resources, skills, and continuous training are ensured;
- all company policies are consistent with SA8000 principles.

Worker participation and Social Performance Team (M2)

- the Social Performance Team (SPT), composed of worker and management representatives, is active;
- the SPT collaborates on risk assessments, monitoring, complaint management, and the definition of corrective actions.

Due diligence, risks, and supply chain (M3–M5)

- Progold identifies and assesses internal social risks and those along the supply chain, with documented processes for assessment, prevention, mitigation, and remediation;
- suppliers are informed of SA8000 requirements and are subject to periodic checks and risk assessments;
- in the event of termination of the relationship with non-compliant suppliers, responsible exit principles are applied;
- Progold regularly consults relevant stakeholders: workers, communities, customers, and business partners.

Objectives, resources, and planning (M6)

- ethical and social objectives are measurable, monitored, and reviewed at least annually;
- responsibilities, resources, and defined timelines are assigned for each action.

Awareness, training, and communication (M7–M8)

- all workers receive training on rights, duties, risks, and reporting channels;
- Progold communicates internally and externally in a clear, accurate, and transparent manner.

Monitoring, assessments, and complaints (M9)

- internal and external complaints are handled through accessible, confidential, anonymous channels without retaliation;
- internal and external audits verify the continuity, effectiveness, and compliance of the system.

Review and continuous improvement (M10)

- Management reviews the SA8000 System at least annually, examining KPIs, audits, risks, corrective actions, and worker feedback;
- each review generates concrete and measurable improvement plans.

REGULATORY REFERENCES

Progold S.p.A. adheres to the SA8000:2026 Standard and to the following international



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instruments concerning human rights and corporate responsibility:

- Universal Declaration of Human Rights
- ILO Conventions (International Labour Organization)
- UN Convention on the Rights of the Child
- UN Conventions against all forms of discrimination (CEDAW, CERD)
- International Covenants on Civil, Political, Economic, Social and Cultural Rights
- United Nations Guiding Principles on Business and Human Rights (UNGP)
- OECD Guidelines for Multinational Enterprises
- ILO Code of Practice on HIV/AIDS and the World of Work

REPORTING AND COMMUNICATION CHANNELS

Progold S.p.A. makes the following reporting channels available to workers and external stakeholders for any violations or suggestions relating to social responsibility:

SAI	Social Accountability International 9 East 37th Street, 10th Floor, New York, NY 10016, USA info@sa-intl.org +1 (212) 684-1414
SAAS	Social Accountability Accreditation Services saas@saasaccreditation.org +1 (212) 391-2106
TÜV SÜD	TÜV Italia Certification Body Viale Fulvio Testi, 280/6 – 20126 Milan https://tuvsud.segnalazioni.net/ +39 02 24130 1
Progold internal channel	Anonymous and secure reports – Social Performance Team https://whistleblowersoftware.com/secure/SocialPerformanceTeam

Reports may be submitted anonymously, with a guarantee of absolute confidentiality and a prohibition of any retaliation against the reporting person.

APPROVAL AND REVIEW

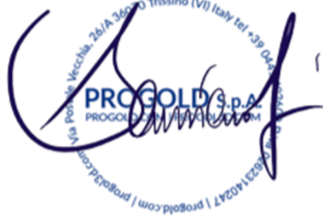
This Policy is approved by the CEO of Progold S.p.A. and is reviewed at least annually to ensure its effectiveness, adequacy, and consistency with regulatory, corporate, and social developments.

The CEO

Damiano Zito

Approval date

07/07/2026




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