CEMES S.p.A. PISA	SOCIAL ACCOUNTABILITY POLICY SA8000:2026	Rev.6 Date: October 26th, 2026

OUR COMMITMENT

The Management of C.E.M.E.S. S.p.A. is committed to respecting human rights and promoting decent, safe and fair working conditions at its offices, workshops and construction sites, and throughout its business relationships. This Policy guides company decisions and is implemented through the Social Accountability Management System.

REGULATORY REFERENCES AND PRINCIPLES

C.E.M.E.S. S.p.A. is committed to complying with and promoting the principles and requirements of the following references:

- **SA8000:2026 – Section 1 (Management Systems) and Section 2 (Decent Work Principles);**
- Fundamental Criteria F1–F5; governance and due diligence requirements M1–M10; performance requirements D1–D7.
- International Labour Organization (ILO) Conventions, the Universal Declaration of Human Rights, the UN Convention on the Rights of the Child and other relevant UN conventions.
- Applicable national and international laws, including Italian Legislative Decree No. 81/2008 and Regulation (EU) 2016/679;
- Applicable National Collective Bargaining Agreements (CCNL), including those for the Metalworking Industry and Construction Industry; the Code of Ethics and relevant company regulations and procedures.

MANAGEMENT COMMITMENTS (Requirement M4.1) (Requisito M4.1)	RIGHTS WE PROTECT (Requirements D1–D7) (Requisiti D1–D7)
Management integrates social accountability into company management and commits to: a) Meeting or exceeding the requirements and principles of SA8000:2026, applicable laws and other obligations. b) Addressing human rights risks and impacts through measures proportionate to their severity and likelihood, including in business relationships. c) Prioritising the prevention of adverse impacts in both the short and long term. d) Acting ethically, with integrity and transparency. e) Maintaining a coherent management system with appropriate responsibilities, resources and controls. f) Consulting workers and interested parties, encouraging participation and social dialogue. g) Considering risks to personnel in company decisions and planning. h) Continually improving social performance and the management system.	**D1_Children and young workers:** We prevent and prohibit child labour that is not permitted by law or by the Standard; we protect any young workers and take action in the event of non-compliance. **D2_Freedom of association:** We respect the right to trade union representation and collective bargaining, without interference or retaliation. **D3_Free and fair employment relationships:** We prohibit forced labour and ensure fairness in recruitment, employment and termination of employment. **D4_Working hours, wages and benefits:** We comply with applicable obligations concerning working hours, rest periods, pay, overtime and benefits, taking into account the principles of a living wage. **D5_Non-discrimination:** We promote equal opportunities and prevent discrimination, harassment, violence and treatment that undermines dignity. **D6_Health and safety:** We prevent risks at offices and construction sites through protective measures, information, training and worker participation. **D7_Privacy:** We protect the personal data and confidentiality of workers and job applicants in accordance with applicable legislation.

GOVERNANCE, RISKS AND BUSINESS PARTNERS – M1–M10, M4.2–M4.3

Management assigns responsibilities and resources, involves the Social Performance Team (SPT) in accordance with the duties established by the Standard, and identifies, prevents, mitigates and manages human rights risks and impacts. It sets objectives and actions, verifies their outcomes and periodically reviews the system. Company practices must be consistent with this Policy.

In its relationships with suppliers, subcontractors and other business partners, C.E.M.E.S. communicates clear expectations regarding human rights and decent work, conducts checks proportionate to the risks, and addresses any issues in accordance with documented criteria, including before considering termination of a business relationship.

INFORMATION, ACCESSIBILITY AND PARTICIPATION – M7

The Policy, workers' rights, essential information on the SA8000 system and reporting channels are communicated clearly and accessibly to all personnel, including new hires and construction-site workers without access to digital systems. Communication may take place through notices, meetings, direct distribution and digital tools, as appropriate. The Company periodically verifies that the information is known and understood and retains relevant evidence. The approved Policy is also made available to interested parties and published on the Company website.

REPORTS, GRIEVANCES AND REMEDIES – M9

C.E.M.E.S. S.p.A. ensures that workers and interested parties can report potential violations of human rights, working conditions and SA8000:2026 requirements, including those relating to business partners.

Reports are handled confidentially, impartially and promptly, with protection against retaliation, in accordance with company procedures. Where necessary, appropriate corrective actions and remedial measures are taken.

Internal reporting channels:

- SA8000 Representative and Social Performance Team (SPT).
- Company portal: https://cemes-spa.com/compliance-aziendale/segnalazioni/https://cemes-spa.com/compliance-aziendale/segnalazioni/
- Reporting boxes at the Via Montelungo and Via Fosso delle Cavalle premises.
- By post: C.E.M.E.S. S.p.A., Via Fosso delle Cavalle 20, 56122 Pisa – For the attention of the SPT.

External reporting channels:

- Certification body APAVE: Apave Certification Italia S.r.l., Via Giuseppe Rosaccio 33, 00156 Rome, Italy; +39 06 33270123; stefano.bertini@apave.comstefano.bertini@apave.com
- Social Accountability International (SAI): 9 East 37th Street, 10th Floor, New York, NY 10016, USA – email: sa8000@sa-intl.org / info@sa-intl.org;sa8000@sa-intl.orginfo@sa-intl.org
- SAAS – Social Accountability Accreditation Services – 220 East 23rd Street, Suite 605, New York, NY 10010, USA – email: saas@saasaccreditation.orgsaas@saasaccreditation.org

Reporting channels may be used freely, without any requirement to first contact one's line manager.

Reports may also be submitted anonymously, in accordance with the arrangements provided by each channel, ensuring confidentiality and protection against any retaliation.

IMPLEMENTATION, REVIEW AND COMMUNICATION

Management ensures the implementation and continual improvement of the Policy, periodically assesses its effectiveness with the involvement of the SPT, and updates it when necessary.

The approved Policy is communicated to all personnel, made accessible at offices and construction sites, and published on the Company website.

APPROVAL AND CONSULTATION

This Policy is approved by the Management of C.E.M.E.S. S.p.A. and shared with the Social Performance Team (SPT).

Pisa, October 26th, 2026

Approved by the C.E.M.E.S. S.p.A. Executive Management:

***Mr Roberto Madonna*, President**

C.E.M.E.S. PISA

Controlled document: distribution and publication following Management approval, consultation with the SPT, and verification that the channels listed in the SA8000:2026 Employee Information Notice, Rev. 3, are operational and accessible.