

## SOCIAL RESPONSIBILITY POLICY

Andromeda Rail S.p.A., a leader in the railway sector, is committed to promoting sustainable development by integrating social responsibility principles into its daily activities. Our social responsibility policy reflects our commitment to employees, customers, suppliers, local communities, and the environment. In this context, Andromeda Rail pledges to recognise the value of its staff's work and to orient its processes towards legality, fairness, and transparency, considering these fundamental to the achievement of its economic and productive objectives.

This document represents Andromeda Rail S.p.A.'s commitment to complying with the principles and requirements set out in **SA 8000:2014**, as well as all applicable related regulations. This policy will be subject to review by Management in the event of: internal or external audits, adaptations arising from changes in current conditions, and relevant regulatory updates.

### OUR VISION

Andromeda places a fundamental importance on human resources, recognising them as the primary driver of success for any organisation. With this in mind, the company is committed to improving the social conditions of all personnel involved, both directly and indirectly through suppliers and subcontractors, with particular attention to employment relations, safety, and the development of human resources.

Andromeda pursues and aims to consolidate the following objectives:

- **Promoting ethical conduct and respect for human rights:** Encouraging ethical attitudes in line with the respect for human rights, both within and outside the organisation. This includes defining processes that involve workers, customers, suppliers, and other stakeholders, including through the adoption of an Organisational Model and a Code of Ethics compliant with Legislative Decree 231/2001 and subsequent amendments.
- **Adoption of an International Standard:** Implementing a Social Responsibility Management System in compliance with the international standard SA 8000, with the aim of continuously monitoring and improving social responsibility principles.
- **Operational Implementation of the Policy:** Translating company values into concrete actions through the introduction of procedures, rules, and instructions that ensure consistent behaviour. Strengthening operational control, monitoring, and measurement systems for increasingly effective management.
- **Communication and Review of the Policy:** Disseminating this Policy to all interested parties and ensuring its availability. Periodically reviewing its contents to ensure its adequacy and alignment with company improvement objectives.
- **Setting Specific Social Responsibility Targets:** Establishing social responsibility objectives through thorough risk analysis and continuous monitoring of opportunities and threats related to the Management System, in order to promote a process of continuous improvement.

### OUR POLICY

Andromeda Rail SpA a socio unico

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In accordance with the above, Andromeda Rail commits to implementing a policy that protects employees in the following areas. This policy is made available to all interested parties (both internal and external) through publication on our website [www.andromedarail.it](http://www.andromedarail.it) and via a shared network folder accessible to all employees.

1. Child Labour
2. Forced Labour
3. Health and Safety
4. Freedom of Association
5. Discrimination
6. Disciplinary Procedures
7. Working Hours
8. Remuneration

### **1. CHILD LABOUR**

In full compliance with the SA 8000 standard, Andromeda Rail permanently prohibits the use of child and juvenile labour. Equally, the company's objective is to prohibit the use of young workers. The company also commits to preventing the use of child labour by its suppliers, both during the supplier selection process and in subsequent operational phases.

### **2. FORCED LABOUR**

Andromeda Rail does not employ personnel against their will and does not resort to any form of forced labour, strictly adhering to the applicable employment contract.

### **3. HEALTH AND SAFETY**

Andromeda Rail takes all necessary measures to ensure workers a safe and healthy working environment, preventing potential accidents, injuries, or illnesses related to work activities. It commits to eliminating hazards and systematically reducing health and safety risks for its employees. To this end, the company promotes awareness and training activities so that workers can carry out their duties safely, both for themselves and for others. In compliance with applicable safety regulations, Andromeda Rail has implemented a specific organisational structure for safety management.

### **4. FREEDOM OF ASSOCIATION**

Andromeda Rail respects the right of all personnel to join trade unions without any discrimination. Freedom of association with trade union organisations is guaranteed. The company ensures that sufficient time and space are provided for structured meetings.

### **5. DISCRIMINATION**

Andromeda Rail refrains from practising or encouraging any form of workplace discrimination at any level (with regard to race, social class, origin, religion, disability, sex, sexual orientation, political affiliation, or age in matters of hiring, remuneration, and career advancement).

The company commits to facilitating the observance and practice of religious holidays other than Catholic ones.

It commits to translating this document and any other material that may be necessary to support and respect workers who do not speak Italian.

Pregnant and breastfeeding women receive the legally required allowances.

## 6. DISCIPLINARY PROCEDURES

Andromeda Rail respects the dignity of every worker, avoiding, not tolerating, and sanctioning disciplinary practices that involve mental or physical coercion or verbal abuse. Any disciplinary measures taken by the company are solely and exclusively those provided for by law.

## 7. WORKING HOURS

Andromeda Rail ensures that working hours comply with the provisions of the applicable National Collective Bargaining Agreement, without exceeding the established limits. It complies with current regulations and the provisions of the National Collective Bargaining Agreement with regard to overtime work.

## 8. REMUNERATION

Andromeda Rail guarantees a minimum wage no lower than that established by the applicable National Collective Bargaining Agreement, ensuring that personnel receive an income sufficient to meet their basic needs and provide a discretionary margin. The company strictly avoids the use of undeclared work ('lavoro in nero') or remuneration practices aimed at circumventing contractual obligations towards workers.

## YOUR VOICE

Andromeda Rail ensures that all workers have the opportunity to submit complaints and reports to the organisation, at any time and on any matter relating to non-compliance with SA 8000 requirements or the commitments stated herein.

Such complaints may be submitted:

- To the Workers' Representative for Social Responsibility;
- Anonymously via the Reporting tool on the website [www.andromedarail.it](http://www.andromedarail.it);
- To the Certification Body (whose details are posted on the company notice board);
- To Non-Governmental Organisations.

Naples, 12/11/2025

  
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