

SOCIAL ACCOUNTABILITY POLICY

Andromeda Rail S.p.A., a leader in the railway sector, is committed to promoting sustainable development by integrating social accountability principles into its daily activities. Our social accountability policy reflects our commitment to our employees, customers, suppliers, local communities and the environment. In this context, Andromeda Rail is committed to recognising the value of its personnel's work and to directing its processes towards compliance with the principles of lawfulness, fairness and transparency, which it considers essential to achieving its economic and production objectives.

This document sets out the commitment of Andromeda Rail S.p.A. to comply with the principles and requirements laid down by **SA 8000:2014**, as well as with all related legislation. This policy shall be reviewed by Management upon events such as internal or external audits, adjustments resulting from changes in current conditions, and relevant regulatory updates.

INTERNATIONAL STANDARDS AND COMMITMENT TO COMPLIANCE WITH ILO STANDARDS

In line with the normative elements referred to in SA 8000:2014, Andromeda Rail S.p.A. **expressly declares its commitment to comply with** the Conventions and Recommendations of the International Labour Organization (ILO) listed below, as well as with applicable national legislation and the relevant Collective Agreements. Where national law, ILO standards and SA 8000 address the same issue, the company applies the provision that is most favourable to workers.

- **ILO Convention No. 1** (Hours of Work – Industry) and Recommendation No. 116 (Reduction of Hours of Work);
- **ILO Conventions No. 29 and No. 105** (Forced and Compulsory Labour; Abolition of Forced Labour) and the 2014 Protocol to Convention No. 29;
- **ILO Convention No. 87** (Freedom of Association and Protection of the Right to Organise);
- **ILO Convention No. 98** (Right to Organise and Collective Bargaining);
- **ILO Conventions No. 100 and No. 111** (Equal Remuneration; Discrimination in Respect of Employment and Occupation);
- **ILO Convention No. 102** (Social Security – Minimum Standards);
- **ILO Convention No. 131** (Minimum Wage Fixing);
- **ILO Convention No. 135** (Workers' Representatives);
- **ILO Convention No. 138** and Recommendation No. 146 (Minimum Age for Admission to Employment);
- **ILO Convention No. 155** and Recommendation No. 164 (Occupational Safety and Health);
- **ILO Convention No. 159** (Vocational Rehabilitation and Employment of Disabled Persons);
- **ILO Convention No. 169** (Indigenous and Tribal Peoples);
- **ILO Convention No. 177** (Home Work);

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Share capital € 500,000.00 fully paid-up

VAT No. 12466380966 | Tel. +39 081 19573854 | Certified e-mail (PEC) andromedapartners@pec.it |

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- **ILO Convention No. 181** (Private Employment Agencies);
- **ILO Convention No. 182** and Recommendation No. 190 (Worst Forms of Child Labour);
- **ILO Convention No. 183** (Maternity Protection);
- **ILO Convention No. 187** (Promotional Framework for Occupational Safety and Health);
- **ILO Convention No. 190** (Elimination of Violence and Harassment in the World of Work);
- **ILO Code of Practice on HIV/AIDS and the World of Work**;
- **ILO Declaration on Fundamental Principles and Rights at Work** (1998, as amended in 2022).

Andromeda Rail is also committed to respecting the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights, the UN Convention on the Rights of the Child, the UN Convention on the Elimination of All Forms of Discrimination against Women, the UN Convention on the Elimination of All Forms of Racial Discrimination and the UN Guiding Principles on Business and Human Rights.

This commitment extends to the entire supply chain: Andromeda Rail requires its suppliers, subcontractors, employment agencies and business partners to comply with the same principles, and verifies their compliance during qualification and throughout the business relationship.

OUR VISION

Andromeda attaches a fundamental role to human resources, recognising them as the main driver of success for any company. 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 relationships, safety and the development of human resources.

Andromeda has set itself the following objectives to pursue and consolidate:

- **Promoting ethical behaviour that respects human rights:** Encouraging ethical conduct consistent with respect for human rights, both inside and outside the organisation. This includes defining processes involving workers, customers, suppliers and other interested parties, including through the adoption of an Organisational Model and a Code of Ethics compliant with Italian Legislative Decree No. 231/2001, as subsequently amended and supplemented.
- **Adoption of an International Standard:** Implementing a Social Accountability Management System compliant with the international SA 8000 standard, with the aim of monitoring and continuously improving social accountability principles.
- **Operational implementation of the Policy:** Translating corporate values into concrete actions by introducing procedures, rules and instructions that ensure consistent behaviour. Strengthening operational control, surveillance 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 their adequacy and consistency with the company's improvement objectives.
- **Setting specific Social Accountability targets:** Establishing social accountability objectives through careful risk analysis and continuous monitoring of the opportunities and threats

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related to the Management System, in order to promote a process of continuous improvement.

OUR POLICY

In accordance with the above, Andromeda Rail is committed to implementing a policy aimed at protecting workers, both direct and indirect, and all interested third parties (suppliers, subcontractors, customers, local communities and any other stakeholder) with regard to the areas described below. This Policy is communicated to all interested parties (both internal and external) through publication on our website www.andromedarail.it and through 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 Practices
7. Working Hours
8. Remuneration

1. CHILD LABOUR

In full compliance with the SA 8000 standard, Andromeda Rail definitively prohibits the use of child and juvenile labour. Likewise, the company's objective is to prohibit the employment of young workers.

The company is also committed to preventing the use of child labour by its suppliers, both when selecting them on the market and during the subsequent performance stages.

ILO references: *Conventions No. 138 (minimum age) and No. 182 (worst forms of child labour); Recommendations No. 146 and No. 190.*

2. FORCED OR COMPULSORY LABOUR

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

ILO references: *Conventions No. 29 (forced labour) and No. 105 (abolition of forced labour); 2014 Protocol to Convention No. 29.*

3. HEALTH AND SAFETY

Andromeda Rail takes all necessary measures to provide workers with a safe and healthy working environment, preventing potential accidents, injuries or illnesses arising from work activities. It is committed to eliminating hazards and systematically reducing risks to the health and safety of its employees. To this end, the company promotes awareness-raising and training activities so that workers can carry out their duties safely, both for themselves and for others. In compliance with current safety legislation, Andromeda Rail has established a specific organisational structure for safety management.

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ILO references: Conventions No. 155 (occupational safety and health) and No. 187 (promotional framework for occupational safety and health); Recommendation No. 164.

4. FREEDOM OF ASSOCIATION

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

ILO references: Conventions No. 87 (freedom of association), No. 98 (right to organise and collective bargaining) and No. 135 (workers' representatives).

5. DISCRIMINATION

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

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

It is committed to translating this document and anything else that may be necessary to support and respect workers who do not know the Italian language.

Pregnant and breastfeeding women receive the allowance provided for by law.

ILO references: Conventions No. 100 (equal remuneration), No. 111 (discrimination in employment and occupation), No. 159 (employment of persons with disabilities) and No. 183 (maternity protection).

6. DISCIPLINARY PRACTICES

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

ILO references: Convention No. 190 (elimination of violence and harassment in the world of work).

7. WORKING HOURS

Andromeda Rail ensures that working hours comply with the provisions of the applicable National Collective Labour Agreement, without exceeding the limits set. It complies with current legislation and with the provisions of the National Collective Labour Agreement regarding overtime.

ILO references: Convention No. 1 (hours of work – industry) and Recommendation No. 116 (reduction of hours of work).

8. REMUNERATION

Andromeda Rail ensures a minimum wage not lower than that established by the applicable National Collective Labour Agreement, providing personnel with an income sufficient to meet basic needs and provide some discretionary income. It strictly avoids undeclared work or any remuneration practices aimed at circumventing contractual obligations towards workers.

ILO references: Conventions No. 131 (minimum wage fixing) and No. 100 (equal remuneration).

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YOUR VOICE

Andromeda Rail ensures that all workers and all interested third parties (suppliers, subcontractors, customers, local communities, non-governmental organisations and any other stakeholder) may submit complaints, reports and suggestions at any time and on any matter concerning non-compliance with SA 8000 requirements, the ILO standards referred to herein or the commitments set out in this Policy.

Reports may be submitted **anonymously** or **by name** (providing one's personal details to allow direct follow-up). Andromeda Rail guarantees the confidentiality of the reporting person and prohibits any form of retaliation or discrimination against anyone who submits a report in good faith.

Reports may be submitted through the following channels, whose contact details are also posted on the company notice board:

1. Direct reports to the Company – SA8000 Management System Manager: Vincenza Palma

Telephone	+39 335 17 23 748
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2. SA8000 Workers' Representative: Gennaro Falco

Telephone	081 19573856
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3. Reporting Portal (anonymous reports also accepted)

Website	Reporting section of the company website https://segnalazioni.andromedarail.it/#/
Management	Reports received through the portal are handled by the SA8000 Management System Manager

4. Certification Body – SI CERT

Telephone	+39 800 983 873
Website	https://sicert.net/segnalazioni/ (reporting procedure and form)
E-mail	segreteriaccsit@sicert.ch

5. Accreditation Body – SAAS (Social Accountability Accreditation Services)

Mail	SAAS, 220 East 23rd Street, Suite 605, New York, NY 10010, USA
E-mail	saas@saasaccreditation.org
Fax	+1 212 684 1515

6. Non-Governmental Organisations

Workers and third parties may also contact directly Non-Governmental Organisations active in the protection of human and labour rights.

Reports received are recorded in the "Report Management" form and handled with the involvement of the SA8000 Management Representative, the SA8000 Workers' Representative, the SA8000 Management System Manager, the relevant functions and Company Management, in accordance

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with the procedures set out in the Management Systems Manual. The outcome is communicated to the reporting person, where identifiable.

Naples, 01/10/2026

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