

### SA8000 POLICY

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### 1. PURPOSE AND SCOPE

Founded in 1978 by President Giovanni Sgariboldi, the company specializes in the creation of fragrances and beauty cosmetics for both proprietary and licensed brands. Thanks to the long-term vision of its management and the dedication of its team, the company has grown to become a recognized global player in the Beauty Industry.

With a strong commitment to both the environment and people, the company ensures that its practices are responsible, promoting the economic and environmental sustainability of its business. The company works closely with some of the most prestigious brands to create original and unique concepts for each fragrance and beauty product, continually investing in research and development.

It also designs packaging that is distributed worldwide.

In an era of change and growing awareness of environmental impact, the company adheres to the principles of green chemistry, focusing on processes that minimize both environmental and social impacts. Great care is taken in selecting the finest raw materials, sourced from traceable and sustainable supply chains, and the company is committed to producing plastic-free packaging, with plastic usage kept to under 1%.

The company's structure includes a highly experienced management and operational team with recognized managerial expertise. As part of its ongoing commitment to improvement, the company has implemented a Social Management System in accordance with SA 8000.

In recent years, the issue of social responsibility has become increasingly important. Ethical considerations such as fairness, responsibility, transparency, respect for human rights, environmental protection, sustainable development, innovation, and product quality are now key aspects of how the company operates and, more broadly, of the role it plays in society.

### 2. SCOPE OF APPLICATION

EUROITALIA S.r.l.'s Ethical commitment is demonstrated in:

- Drafting of a Social Responsibility Policy
- Construction and implementation of a SA 8000 Management System.

The importance of drafting a Social Responsibility Policy is based on the awareness that the integrity, reputation, and profitability of the company primarily depend on the individual behaviour of its directors, employees, collaborators, third parties, and suppliers. This document is not drafted in accordance with Legislative Decree 231/01 (Organizational Models 231). The Social Responsibility Policy aims to define the principles, values, and behaviours that must daily inspire the conduct of EUROITALIA S.R.L.'s activities. Therefore, this document is an expression of the company's core values and serves as a point of reference for every decision-making process.

The Policy must be used as a guide and consequently:

- Every employee and associate are strictly responsible of the respect of the indications available in the Social Responsibility Policy and is accountable for it.
- The suppliers and third parties of EUROITALIA S.r.l. are invited to acknowledge it and comply with social commitment of the products defined in this document and to sign a commitment letter.
- Every other stakeholder is invited to read the Policy carefully and always keep its content in mind.

Ethics and compliance with the standards relevant to the company, in line with its activities, processes, and products, are responsibilities that EUROITALIA S.R.L. aims to share with its business partners and all interested parties. Anyone who becomes aware of situations that may appear inconsistent with the ethical values and behavioural standards outlined in the Policy is required to inform the Management, the Social Responsibility Management Representative, or the Workers' Representative for Social Responsibility.

### 3. PRINCIPLES AND VALUES

EUROITALIA S.r.l. is committed to maintaining ethical and professional conduct standards towards its employees, collaborators, and all other business partners: Clients, Suppliers, associations, institutions, and local communities. This commitment and the responsibility it entails are summarized below.

#### 4. TEAM MEMBERS

Towards its collaborators (employees, temporary workers, etc.) EUROITALIA S.r.l. is committed to respecting the following ethical principles through the implementation, maintenance and continuous improvement of its Management System in compliance with SA 8000

- Ensure quality products in accordance with customer requirements and applicable product standards.
- Do not use or promote the use of child labour.
- Do not use or promote the use of forced labour.
- Provide all employees with a safe and healthy working environment.
- Respect workers' right to join and form trade unions.
- Do not engage in any form of discrimination.
- Do not use or promote corporal punishment, mental or physical coercion, or verbal abuse.
- Ensure compliance with minimum wage levels as required by current Italian legislation and the National Collective Labor Agreement.
- Operate in compliance with international and national laws concerning product standards and the National Collective Labor Agreement

EUROITALIA S.R.L. is committed to acting fairly in all reciprocal relationships and applying an employment policy based on equal opportunities for all employees and collaborators, encouraging dialogue, listening to individual needs and requirements in order to create a pleasant work environment, an atmosphere that supports open and honest exchanges of opinions, and promotes the well-being of its staff.

EUROITALIA S.R.L. recognizes everyone's right to privacy and prioritizes the care of its employees, their health and safety in the workplace, their professional growth, personal satisfaction, and motivation.

#### 5. ENVIRONMENT

EUROITALIA S.R.L.'s commitment to the Earth is focused on preserving its abundance and beauty for present and future generations, with the aim of passing on the values and traditions that support the long-term development of both human and environmental communities.

EUROITALIA S.R.L. is committed, at every stage of its operations, to applying a preventive approach towards the environment and its biodiversity, promoting initiatives for greater corporate environmental responsibility, developing the use of vehicles and technologies that do not harm the environment, and utilizing energy from renewable sources.

#### 6. ASSOCIATIONS AND NGOs

EUROITALIA S.R.L. is dedicated to promoting the exchange of information, open dialogue, and transparency with all the associations and NGOs it works with.

#### 7. PRODUCT

The product is at the heart of every activity and daily commitment. EUROITALIA S.r.l. focuses its efforts on innovation to create products of ever-higher quality, in compliance with applicable laws, technical standards and industry regulations.

#### 8. CUSTOMERS

Clients are the individuals who entrust us with their projects and needs, enabling us to perform our activities. The company is committed to providing all clients with high quality, professionalism, excellence, and honest behaviour, with the aim of continuously pursuing their satisfaction. Relationships must always be based on principles of legality, morality, transparency, and professional integrity.

#### 9. SUPPLIERS

Suppliers are partners in achieving business success. The company is committed to treating all suppliers fairly. Fair competition should be encouraged, free from discriminatory or unfair practices, with the aim of building long-lasting business relationships based on

fairness and transparency.

### 10. COMPETITORS

Competitors are a positive stimulus to improve and stay competitive. EUROITALIA S.R.L. is driven by a strong and fair competitive spirit aimed at the continuous improvement of its activities.

### 11. OTHER INTERESTED PARTIES

EUROITALIA S.R.L. is committed to acting responsibly within the local community in which it operates, in compliance with all national and local laws, and is dedicated to improving the quality of life by promoting initiatives that raise awareness on issues related to human rights protection, as well as the growth and professional development of young workers and environmental sustainability.

### 12. INSTITUTIONS

EUROITALIA S.R.L. is committed to maintaining an open and transparent dialogue with all national, regional, and local institutions it interacts with on a daily basis.

### 13. COMMITMENT TOWARDS EMPLOYEES AND ASSOCIATES

EUROITALIA S.R.L.

- It does not use or support the use of child labour.
- It does not use or support the use of forced labour. It is committed to ensuring that all workers are fully aware of their rights and obligations under their employment contracts.
- It guarantees all workers a safe and healthy working environment by complying with applicable regulations, providing continuous training, information, and updates on health and safety, and being open to inspections and audits by the relevant authorities. It also takes all necessary measures to minimize workplace hazards.
- It respects workers' rights to join trade unions of their choice and to participate in collective bargaining.
- It is committed to not supporting discriminatory practices in hiring, remuneration, access to training, promotion, dismissal, or retirement based on race, social class, national origin, religion, disability, gender, sexual orientation, union affiliation, political affiliation, or age. It guarantees equal opportunities for all workers and new qualified candidates. It respects the confidentiality and dignity of all employees.
- It does not use or support corporal punishment, mental or physical coercion, or verbal abuse. Any disciplinary action is taken in full compliance with the Workers' Statute and the applicable National Collective Labor Agreement.
- It is committed to fully complying with international and national labour laws.
- It ensures the confidentiality and dignity of employees and collaborators by collecting only the personal data necessary for efficient personnel management or required by law. Access to personal data is limited to those who have a legitimate need to know (competent authorities). It complies with all applicable data protection and privacy laws. The company respects employees' private lives and prohibits any interference in their conduct outside the workplace, as long as such conduct does not negatively affect their work or harm the company's reputation.
- It is committed to providing employees and collaborators with timely and relevant information about company performance, customer relations, and achievements. An anonymous and non-anonymous communication channel has been established, allowing employees to freely express opinions, concerns, and suggestions.
- It guarantees that all reports and complaints, both anonymous and non-anonymous, will receive an appropriate response. No penalties will be applied to those who report issues or express complaints.
- It is committed to promoting the training and professional growth of employees and collaborators, encouraging them to develop and enhance their professional skills.

### 14. COMMITMENT TOWARDS SUPPLIERS E THIRD PARTIES

EUROITALIA S.R.L.'s company policy for purchasing equipment, materials, services, raw materials, etc., is based on their intrinsic value. Suppliers, service providers, and contractors of EUROITALIA S.r.l. are treated fairly, justly, and without discrimination.

EUROITALIA S.R.L.

- Commits to ensuring that payments for supplies are made within the timeframes established by the contract or purchase order.
- Commits to fostering a collaborative relationship based on trust, information exchange, transparency, and professional integrity.
- Is obligated to respect the confidentiality and trade secrets of suppliers and contractors.
- Commits to a policy of informing suppliers and contractors of any accounting or administrative errors and to immediately correct any such errors through credits, refunds, or other acceptable measures agreed upon by both parties.
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### 15. COMMITMENT TOWARDS CUSTOMERS

EUROITALIA S.R.L.

- Commits to designing and producing items by seeking the highest quality and professionalism.
- Is obligated to understand customer needs and meet them by offering high-quality products at competitive prices and conditions.
- Is required to sell products honestly, based on their intrinsic qualities, and avoid any sale where success would imply on illegal actions or violations of general regulations.
- Is obligated to respect confidential information and data related to customers that it may become aware of.
- Commits to a policy of informing customers of any accounting or administrative errors and to promptly correct any such errors through credits, refunds, or other acceptable measures agreed upon by both parties.
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### 16. COMMITMENT TOWARDS THIRD PARTIES

- EUROITALIA S.r.l. is socially responsible and follows a policy aimed at communicating its ethical and social performance to all external stakeholders through direct dialogue and the use of the SA8000 Social Report.
- Actively commits to supporting social organizations and activities within the community where it operates. Encourages employees and collaborators to participate in public life
- Commits to promoting the issue of human rights, with particular attention to the protection of children and young workers involved in hazardous work activities.

### 17. COMMITMENT OF EMPLOYEES AND ASSOCIATES TOWARDS EUROITALIA S.R.L

All workers are required to report any information they may have, regarding child labour cases at the Suppliers or Contractors of EUROITALIA S.r.l.

#### ***Health and Safety in the work environment***

In order to protect the health and safety of the workers and clients of EUROITALIA S.R.L., all employees are required to:

- Strictly follow all safety procedures while performing their work
- Avoid smoking in company premises, including restrooms, and only in designated areas provided by the company.
- Report to the Head of the Prevention and Protection Service any information that could prevent harmful events affecting the health of workers and clients.

#### ***Discrimination***

The employees are required not to engage in any discriminatory practices of any kind towards their colleagues, newly hired employees, or to act in a manner contrary to a constructive attitude. Interpersonal relationships must be based on the principles of mutual respect

and the dignity of individuals

### ***Drugs and alcohol abuse***

Every employee is required to comply with applicable laws and regulations regarding the possession or use of alcohol or drugs. EUROITALIA S.r.l. prohibits the illegal use, sale, purchase, transfer, possession, or presence of drugs on company premises, except for prescription medications. The company also prohibits the use, sale, purchase, transfer, or possession of alcoholic beverages by employees within the company's facilities and surrounding areas.

### ***Protection of EUROITALIA S.R.L.'s tangible and intangible assets***

EUROITALIA S.R.L.'s assets include both physical items, such as computers, printers, work equipment, systems, etc., and intangible assets, such as confidential information, know-how, and knowledge. The protection and preservation of these assets and information is a fundamental value for safeguarding the company's interests. It is the responsibility of the staff (while performing their work) not only to protect these assets and information but also to prevent their fraudulent or improper use. Employees are expected to use these assets solely and exclusively for the performance of their duties.

Behaviours to be maintained in the workplace and company facilities:

All collaborators and employees are required to:

- Provide truthful and accurate information regarding their professional experience.
- Carry out their duties with the highest level of professionalism and seriousness.
- Work with the aim of stimulating learning and knowledge.
- Be open to continuous updating and improvement of their professional skills, maintaining and enhancing them.
- Refrain from any form of discrimination against customers, suppliers, and colleagues, and avoid creating ambiguous situations with them.
- Maintain behaviour that is morally aligned with the ethical and social principles of EUROITALIA S.r.l.

## **18. COMMITMENT OF THE CUSTOMERS**

All costumers must commit to:

- Behave politely and appropriately towards all employees.
- Preserve the quality of the products received.
- Report to EUROITALIA S.r.l. any improper behaviour by collaborators or employees.

## **19. COMMITMENT OF SUPPLIERS AND THIRD PARTIES**

All suppliers and third parties must commit to:

- Meet the commitments made to EUROITALIA S.r.l. in terms of punctuality, safety standards, and the quality of the products and services provided.
- Establish supply relationships with companies that also ensure compliance with the requirements of the SA8000 standard (certification is not required).

Current and new suppliers and third parties must therefore commit to:

- Comply with current legislation and respect the rights of their collaborators.
- Sign the Commitment Letter towards the Social Responsibility Policy
- Share the values and principles of EUROITALIA S.R.L. and formally commit to adhering to the code of conduct.
- Complete the information questionnaire when requested.
- Be available for potential inspections by EUROITALIA S.R.L.

## **20. COMPLIANCE WITH STANDARDS**

EUROITALIA S.r.l. is committed to ensuring compliance with the principles, values, and commitments outlined in this Social Responsibility Policy. All employees, collaborators, suppliers, contractors, and clients are required to follow the behavioural rules defined in this Social Responsibility Policy.

EUROITALIA S.r.l. will take disciplinary action against employees whose conduct is inconsistent with and disrespectful of the values and principles that form the basis of the Social Responsibility Policy, depending on the severity of the infractions and behaviours exhibited. As with all disciplinary matters, the company will adhere to principles of fairness and equity, in compliance with applicable regulations, including the National Collective Labor Agreement (CCNL).

EUROITALIA S.r.l. will also take action against suppliers and contractors who fail to comply with the rules of the Social Responsibility Policy, in compliance with the procedures established in the Company Management System.

### 21. RESPONSIBLE PERSONS FOR THE INTERPRETECTION AND APPLICATION OF THE SOCIAL POLICY

For the full compliance and interpretation of the Social Responsibility Policy, staff can refer to the Social Responsibility Management System Manager or the Workers' Representative for Social Responsibility.

The Social Responsibility Management System Manager is responsible for the following tasks:

- Effectively distribute the Social Responsibility Policy to employees, clients, suppliers, and all other interested third parties.
- Managing, implementing, reviewing, and verifying the regulations related to the Social Policy to ensure alignment with evolving laws.
- Providing operational support in the interpretation, implementation, and evaluation of the Social Responsibility Policy, serving as a constant reference for the proper behaviour during work activities.
- Monitoring, controlling, and assessing violations of written rules, taking appropriate measures in case of infractions, in collaboration with the management, while respecting laws, regulations, and the applicable National Collective Labor Agreement (CCNL).
- Promoting and preparing communication and training programs for employees to ensure a better understanding of the objectives and the required behaviors to achieve them.

The Workers' Representative for Social Responsibility is responsible for the following tasks:

- Protecting and assisting employees who report non-compliant behaviours with the Social Responsibility Policy, ensuring they are shielded from pressure, interference, intimidation, and retaliation.
- Collaborating in the dissemination of the Social Responsibility Policy to employees and all interested third parties.

### 22. NOTIFICATION OF THE VIOLATIONS

Each individual is required to bring to the attention of the Social Performance Team, or anonymously through the designated complaint/report mechanism, any actual or suspected violations of EUROITALIA S.r.l.'s behavioural standards. It is committed to not taking any action against anyone who has reported a violation. Additionally, violations can be reported through official channels such as:

- By mail, sending the complaint to: EUROITALIA S.r.l. Via Galileo Galilei 5, 20873 - Cavenago di Brianza (MB)
- By email to the following address (restricted access): [hr\\_department\\_office@euroitalia.it](mailto:hr_department_office@euroitalia.it)
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- Verbally, by communicating the complaint to a member of the Social Performance Team (SPT)
- Contacting:
  - SGS ICS Italia S.r.l. - Via Caldera, 21 - 20153 Milano (Certification Body), e-mail: [sa8000@sgs.com](mailto:sa8000@sgs.com) - Fax: +39 051 6389926;
  - SAI - Social Accountability International - Social Accountability Accreditation Services (SAAS NYC Headquarters 9 East 37th Street; 10th Floor New York, NY 10016 United States of America  
Phone: 212-684-1414 | Fax. 212-684-1515 Email: [saas@saasaccreditation.org](mailto:saas@saasaccreditation.org).