



SA8000 OPERATING MANUAL

IN ACCORDANCE WITH THE SA8000:2014 STANDARD

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1. INTRODUCTION

Ai Engineering Srl operates in the engineering and architecture sector, providing integrated consultancy services and highly specialised civil engineering services to public and private clients.

Its areas of expertise span the construction, environment, infrastructure and transport sectors.

Aware of its economic and social role, as well as the impact its activities may have on workers, business partners and the local community, the organisation has decided to adopt a Social Responsibility Management System compliant with the SA8000:2014 standard. This decision forms part of a broader commitment to the quality of the services provided, worker safety and respect for the environment.

This Manual describes the set of principles, rules, responsibilities and operating procedures adopted by Ai Engineering to ensure respect for human and workers' rights, with a view to the continuous improvement of working conditions and ethical conduct.

2. ANALYSIS OF THE ORGANISATION'S CONTEXT

The analysis of the internal and external context aims to identify the factors that may influence the Organisation's ability to achieve the objectives of the SA8000 Management System.

Ai Engineering is an engineering firm, organised into specialist technical divisions, in addition to the Administration division.

The heads of the technical sectors report to the Board. Each sector employs highly specialised technicians, all of whom hold a diploma, with the vast majority being graduates. Integration between sectors takes place systematically according to the requirements of the specific project.

Ai Engineering's workforce comprises Technical Directors, Partners, employees and contractors.

3. PURPOSE AND SCOPE

The purpose of this Manual is to describe the Social Responsibility Management System adopted by Ai Engineering in accordance with the requirements of the SA8000:2014 standard, in order to ensure that all business activities are carried out with due regard for human rights, the dignity of workers, and ethical and safe working conditions.

The SA8000 Management System applies to all activities carried out by the Organisation, to all business functions and to all employees and contractors. The scope of application also includes suppliers and subcontractors who may have a significant influence on the Organisation's social performance.

4. REGULATORY AND LEGISLATIVE REFERENCES

Ai Engineering is committed to operating in full compliance with current national laws, applicable international regulations, signed collective labour agreements and the requirements of the SA8000:2014 standard.



Where legislative, contractual or regulatory provisions cover the same subject matter, the Organisation shall always apply the provision most favourable to workers.

The SA8000 Management System is also based on the principles enshrined in the Universal Declaration of Human Rights, the Conventions of the International Labour Organisation (ILO), the United Nations International Covenants and other international instruments relating to human rights and labour.

5. SOCIAL RESPONSIBILITY POLICY

The Management of Ai Engineering has drawn up and approved a Social Responsibility Policy which sets out the Organisation's commitment to operating in an ethical and responsible manner, whilst respecting human rights, decent working conditions and applicable legislation.

The Policy sets out the fundamental principles regarding child labour, forced labour, health and safety, freedom of association, non-discrimination, fair disciplinary practices, working hours, fair remuneration and the management system.

The Policy is communicated to all staff, made available to external stakeholders and reviewed periodically to ensure it remains appropriate.

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6. STAKEHOLDERS

The Organisation identifies and monitors the stakeholders relevant to the SA8000 Management System, including employees, contractors, customers, suppliers, business partners, institutions, regulatory bodies and local communities.

The needs and expectations of stakeholders are taken into account in the planning of the Management System, in the assessment of social risks and in the periodic review of performance.

Ai Engineering promotes dialogue and the progressive involvement of stakeholders, with the aim of disseminating the principles of social responsibility throughout the entire value chain.

7. SA8000 STANDARD REQUIREMENTS

Ai Engineering fully complies with the requirements of the SA8000:2014 standard.

The Organisation condemns all forms of child labour and does not employ or support the employment of minors below the minimum age laid down by law. Procedures are in place to verify the age of staff and, should any risk situations be identified, protective and remedial measures are implemented.

Any form of forced or compulsory labour is also prohibited. Staff are not subject to coercion, the withholding of documents, security deposits or restrictions on their freedom to terminate their employment in accordance with the terms of their contract.



With regard to health and safety, Ai Engineering guarantees safe and healthy working environments, in compliance with current legislation. Risks are assessed through the Risk Assessment Document and managed through the implementation of a Management System compliant with UNI ISO 45001.

The Organisation recognises and protects the right to freedom of association and collective bargaining, ensuring that employee representatives can operate without discrimination or reprisals.

All forms of discrimination are prohibited at every stage of the employment relationship. Staff are treated with dignity and respect, and abusive, coercive or humiliating disciplinary practices are not tolerated.

Working hours and pay are managed in accordance with current legislation and the relevant collective agreements, ensuring decent wages, transparency in payslips and fair remuneration for overtime.

8. ORGANISATIONAL STRUCTURE AND RESPONSIBILITIES

Ai Engineering's organisational structure is defined by an organisational chart and job descriptions, which clarify the roles, responsibilities and authority of the staff involved in the SA8000 Management System.

Management retains ultimate responsibility for compliance with the Standard and ensures that the necessary resources are available. Specific coordination and representative roles are set out in Chapter 9.

9. SOCIAL RESPONSIBILITY MANAGEMENT SYSTEM (SA8000)

9.1 Purpose of the SA8000 Management System

The purpose of the Social Responsibility Management System is to define and implement a structured set of policies, responsibilities, procedures, processes and control tools aimed at ensuring the Organisation's compliance with the requirements of the SA8000:2014 Standard and with applicable statutory regulations.

The SA8000 Management System enables the Organisation to:

- ensure respect for human and labour rights;
- prevent and mitigate actual or potential social risks;
- promote the continuous improvement of working conditions;
- demonstrate its compliance with the Standard to interested parties.

9.2 Social Responsibility Policy

Management has decided to implement a Social Responsibility Management System within the Organisation that complies with SA8000:2014, by formalising a Social Responsibility Policy which:

- sets out the Organisation's ethical and social values;
- ensures compliance with national and international standards;



- declares a commitment to continuous improvement.

The SA8000 Policy:

- is drafted in Italian and in English;
- is approved by senior management;
- is reviewed periodically;
- is made available to staff and stakeholders.

9.3 Comunicazione e diffusione della Politica

To ensure that the SA8000 Policy is understood, implemented and supported at all levels, the Organisation has put in place the following measures:

- publication on the company website;
- direct communication with employees, suppliers and stakeholders;
- regular information and training sessions;
- communication of updates to the Policy.

9.4 Roles, responsibilities and authority

9.4.1 Management

Management:

- has ultimate responsibility for compliance with the SA8000 Standard;
- approves the SA8000 Policy and objectives;
- provides adequate resources;
- promotes a culture of social responsibility.

9.4.2 Management Representative for Social Responsibility (RGRS)

Management appoints a Management Representative for Social Responsibility, who is granted full authority to:

- ensure compliance with SA8000 requirements;
- coordinate the Management System;
- monitor compliance;
- propose corrective, preventive and improvement actions;
- liaise with the certification body.

9.4.3 Workers' Representative for Social Responsibility (RLRS)



In order to promote dialogue and participation, employees democratically elect an SA8000 Employee Representative, who:

- represents staff on SA8000 matters;
- collects reports and complaints;
- proposes corrective and improvement actions;
- collaborates with the Social Responsibility Manager (RGRS).

The Employee Representative for Social Responsibility (RLRS) does not replace trade union representation.

9.5 Involvement and internal communication

The Organisation ensures effective communication processes to:

- disseminate information on the SA8000 System;
- inform workers of their rights;
- report risk situations;
- share results and improvements.

The channels used include:

- written communications;
- regular meetings;
- structured training.

9.6 SA8000 Risk Analysis and Assessment

The Organisation carries out a social risk assessment at least once a year, aimed at identifying:

- actual or potential risks of non-compliance with SA8000;
- priority areas for action;
- opportunities for improvement.

The assessment is based on:

- analysis of business processes;
- consultation with stakeholders;
- data from audits, complaints and reports;
- supply chain analysis.



9.7 Management of Reports and Complaints

The Organisation provides channels for reporting:

- alleged SA8000 breaches;
- social and labour issues;
- non-compliance.

It is guaranteed that:

- reports may also be made anonymously;
- there will be no retaliation;
- confidentiality is protected.

Every report is:

- recorded;
- analysed;
- addressed through corrective or preventative measures.

9.8 SA8000 Internal Audits

Internal audits are planned at least once a year and are intended to:

- verify compliance with the SA8000 System;
- assess the effectiveness of the actions taken;
- identify opportunities for improvement.

The audits comprise:

- documentary reviews;
- staff interviews;
- checks on relevant suppliers.

The results are documented and reported to management.

9.9 Management of non-conformities and corrective actions

Every non-conformity identified is:

- recorded;
- analysed to determine its causes;
- rectified through defined actions;
- monitored until its effectiveness has been verified.



Preventive actions are taken when potential risks are identified.

9.10 Supply Chain Control

The Organisation promotes compliance with SA8000 throughout the value chain by:

- qualifying suppliers;
- ensuring adherence to the Code of Conduct;
- conducting periodic audits and monitoring;
- managing supplier non-conformities.

9.11 Management Review

Management carries out a review of the SA8000 System at least once a year in order to verify its:

- adequacy;
- suitability;
- effectiveness.

The review analyses:

- audit results;
- reports and complaints;
- social performance;
- corrective and preventive actions;
- future objectives.

Extraordinary reviews may be carried out as and when necessary.

9.12 Continuous Improvement

The Organisation undertakes to:

- continuously improve the SA8000 System;
- update policies and procedures;
- strengthen the culture of social responsibility;
- actively involve workers and stakeholders.



10. ACCESS TO AUDITS AND TRANSPARENCY

Ai Engineering ensures that the information necessary to demonstrate compliance with SA8000 requirements is made available to legitimate interested parties, whilst complying with confidentiality obligations and legal requirements.

The Organisation supports audit activities carried out by certification bodies, customers or other interested parties, by facilitating access to documentation and, where contractually required, by encouraging similar audits to be carried out at suppliers' premises.

11. CONTINUOUS IMPROVEMENT

Ai Engineering is committed to continuously improving the effectiveness of its SA8000 Management System by monitoring social performance, analysing results, engaging with employees and stakeholders, and periodically updating policies, procedures and operational tools.

This Manual is subject to periodic review to ensure it remains appropriate in the light of regulatory, organisational and social developments.