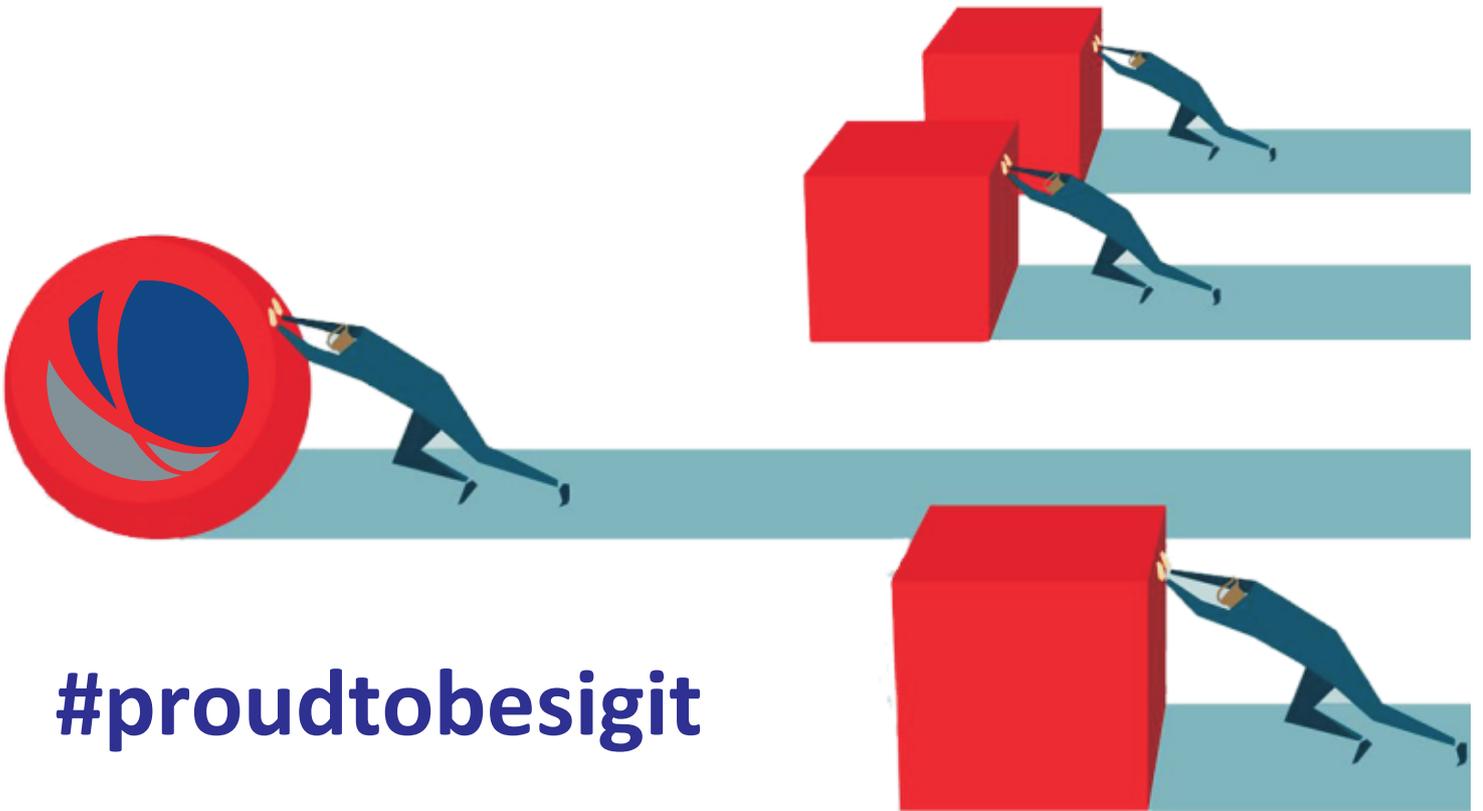




**SIGIT**  
**E-FUTURE**  
our support to the earth



**Corporate  
Social Responsibility  
2021**



**#proudtobesigit**



# Duns Code

SIGIT Oman Automotive Group LLC	Sultanate of Oman	
SOAG EUROPE SA	Switzerland	480048330
SOAG APPLIANCE SA	Switzerland	480167991
SIGIT DEUTSCHLAND GmbH	Germany	313798546
SIGIT SpA	Italy	428706212
Turin HQ Offices		441019594
San Giustino Plant		428706212
Atessa Plant		564830409
Lacedonia Plant		
895797587		
Cambiano Plant		
339797903		
SOAG APPLIANCE Srl	Italy	438012948
Monte San Vito Plant		438012948
Comunanza Plant		438073372
ISC Lab SCarL	Italy	441360886
SIGIT POLAND SpZoo	Poland	422260245
Skoczow Plant		422260245
Czechowice Plant		851389996
SIGIT AUTOMOTIVE SL	Spain	474803140
SIGIT ROMANIA Srl	Romania	524034615
TP CUGIR Srl	Romania	505117659
SIGIT Doo	Serbia	499508464
SIGIT MAROC TFZ Sarl	Morocco	354173350



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# MESSAGES

*"The reputation of our Company honest, loyal and capable, in which we work and the one to do business with is one of our biggest assets. This is what we wish to pass on to our children and the future generations. To keep these values, which we trust are a competitive advantage, it is important that each of us in SOAG EUROPE SA believe, know, understand and adhere to this Code, which must become the lowest common denominator behind our decisions, actions and thoughts. While SOAG continues to grow and succeed, the commitment of our society for ethical conduct must become our main driver. Our Group is entering new markets and expanding its business year after year, it is our duty, observe the highest standard of ethical conduct. It is essential that our employees, the new ones as well as the most experienced, know, apply and develop this modus operandi that has seen us growing during these years. The ethical behavior of each employee of the Group is an essential starting point for our commitment toward the true corporate sustainability! We act to ensure the success and longevity of our society, for the benefit of our customers, suppliers, shareholders, employees and the communities within which we operate. We are working within the world, the same world we will leave to our children and to future generations and we want it would be better than the one we had! Our uncompromising ethics is the first step to do this. The SOAG Group's Global Code of Ethics sets out those principles to which all our employees must adhere, wherever they work and in all circumstances. We can't compromise our goal due a lack of knowledge and sharing of this code. The realization of our ideals passes not only through our ability to provide products and quality services, but also through our integrity and our high ethical standards. Only in this way we give a contribution to changing the world! Act if you believe! Believe in ethics, which becomes the foundation of the quality of life, quality in life, quality in choices. This becomes not only a quality product, but a world which increases in quality. This code simply wants to be a guide for our actions. For this reason, we must spread it first in the whole SOAG world.*

*Let us set a good example. Let us be aware of our goal and responsibility that each of us has for the success of the common results."*



Pierangelo Decisi  
Chairman SOAG EUROPE SA



*"We want to be a Changemaker in our business, and with this Vision, we will drive the company in the New World. Business cannot thrive in a world of poverty, inequality, unrest, and environmental stress. So, SOAG has a vital interest in ensuring that the 2030 Agenda for Sustainable Development and its 17 Sustainable Development Goals (SDGs) are delivered. We can do this by upholding recognized standards and principles on human rights, labor, the environment, and anti-corruption, so the Group will make an essential contribution to the SDGs. To achieve the Goal, we must involve all our Stakeholders in this crucial trip to change the world for our sons and daughters, and all future generations. Going beyond regular communication to stakeholders, effective corporate reporting is key to building trust and aligning investment through transparency and accountability.*

*This Reporting, however, is neither the start nor the end of a company's sustainability strategy and implementation, it is a strategic tool that:*

- *engages SOAG's stakeholders;*
- *supports sustainable decision-making processes at all levels within SOAG;*
- *shapes SOAG's business strategy;*
- *guides innovation and drives better performance and value creation;*
- *attracts investments to SOAG.*

*We have to change our mental approach to the business. It is a long and hard trip, but together could be a fantastic opportunity. Enjoy it, welcome on board! We will drive this change, only if we will work all together in the same direction.*

Emanuele Mario Buscaglione

CEO SOAG EUROPE SA





# 1. BACKGROUND

The identity of our Company is founded on the cultural, material and immaterial heritage, created over more than 50 years of history. A wealth of experiences and values that coexist and are the trait union between a past that has its roots in post-war Italy where lived great dreamers and professionals who developed increasingly daring ideas reaching the technology that we apply today.

People who, with their thrift, work and passion have been able to use their skills and ingenuity achieving projects contributing to the knowledge of all stakeholders of the automotive world.

The tradition and our past gave us the possibility to project us towards a future, that sees us among the protagonists of the industry 4.0

SIGIT SpA has been actively supporting the automotive market since 1966 as a key partner of automobile, commercial vehicle manufacturer and Tier 1 customer, focusing its presence in the EMEA market (Europe, Middle East, and Africa). Current business focus is on technical rubber injection and thermoplastic injection. SIGIT is capable to perform product design and development as well as prototype and prototype equipment manufacturing. since 2008, SIGIT S.p.A. is also a supplier to the appliance Industry, where it has succeeded in establishing itself as a technological leader.

SOAG EUROPE SA (hereinafter also "SOAG Europe" or "the Company" or "the Group") is a corporation organized under the laws of Switzerland, having its head office in Morbio Inferiore, Ticino Canton. SOAG EUROPE SA was established in 2015 and, following the acquisition of SIGIT S.p.A. (hereinafter also "SIGIT Italy") and its subsidiaries, SIGIT Doo, Grosnica (hereinafter also "SIGIT Serbia"), SIGIT Poland Sp. z o.o. (hereinafter also "SIGIT Poland"), SIGIT Maroc TFZ SARL (hereinafter also "SIGIT Morocco") and the joint venture KVART SIGIT (Russia), manages, coordinates and finances the operations of the Group, which has been operating since 1966 in the Automotive industry, more specifically in the production of rubber, plastic and thermoplastic components, supplying automobile and commercial vehicle manufacturers ("car-makers") and Tier 1. Starting from 2008, the Group has been a key-player in the Appliance market. SOAG EUROPE SA is the Switzerland-based sub-holding of SIGIT Oman Automotive Group LLC (hereinafter "SOAG Oman"), a limited liability company established under the laws of the Sultanate of Oman by SIGIT Promoters SA, a company organized under the laws of Switzerland, and National and Industrial Resources Company LLC, a company organized under the laws of Sultanate of Oman, whose shareholder is Oman Investment Authority. In 2015, the entrepreneurs,

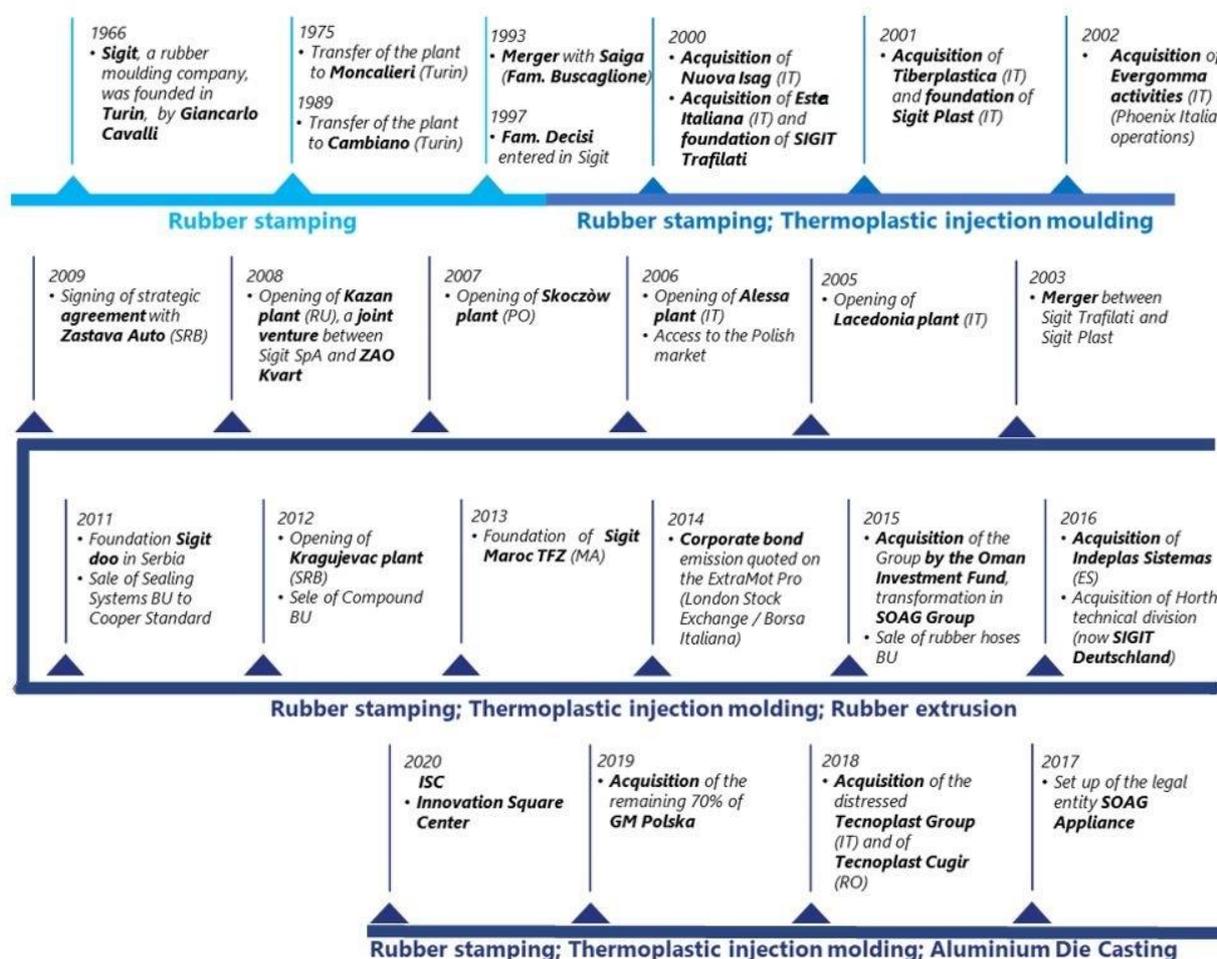


owning SIGIT Group, sold a significant share of SIGIT S.p.A. to Oman Investment Fund (OIF), the Sovereign fund of the Sultanate of Oman, with the aim of streamlining the generational handover and giving the Group the financial power to keep on growing in the market.

Since 2017, the SOAG Group, with the aim of better diversify the market risk, a strategy already begun with the widening of the customer base in the automotive market, has developed its presence in the Appliance sector, through the establishment of SOAG Appliance SA, a company incorporated under Swiss law, owned by 70%. As of December 31, 2020, SOAG Appliance SA, a pure holding company, is the sole shareholder of:

- SOAG Appliance Italia S.r.l., an Italian company, mainly involved in large household appliances (components for dishwashers and washing machines);
- Tecno Plast Cugir S.r.l., a Romania-based company, whose main business is represented by small domestic appliances (components for coffee machines).

SOAG EUROPE SA is the platform through which the Group will grow, now and in the future, in the EMEA Market (Europe – Middle East – Africa); in particular, it coordinates all the operational and strategic functions of the Group, supplying automobile and commercial vehicle manufacturers (“car makers”) and Tier 1.





## 2.WHO WE ARE

Responsible business is the key to long-term high performance. This goal is essentially based on a stable capital structure that supports the launch of strategic projects and a solid plan, designed to meet sustainable plastic component solutions for our customers.

Our strategy is supported by strong core know-how in technologies that will support SOAG EUROPE SA with the aim of being among the best players in EMEA area. We have acquired inquiries from institutions and clients on environmental and social issues. The institutional strategy is to get bottom-up commitments along the supply chain for each sector. We have begun to develop a comprehensive strategy focused on flexibility choices and opportunities to align with EU objectives. It is also true that it will not be easy, because often the suppliers are into different sectors. SOAG EUROPE SA operates mainly in sectors such as Automotive and Appliance.

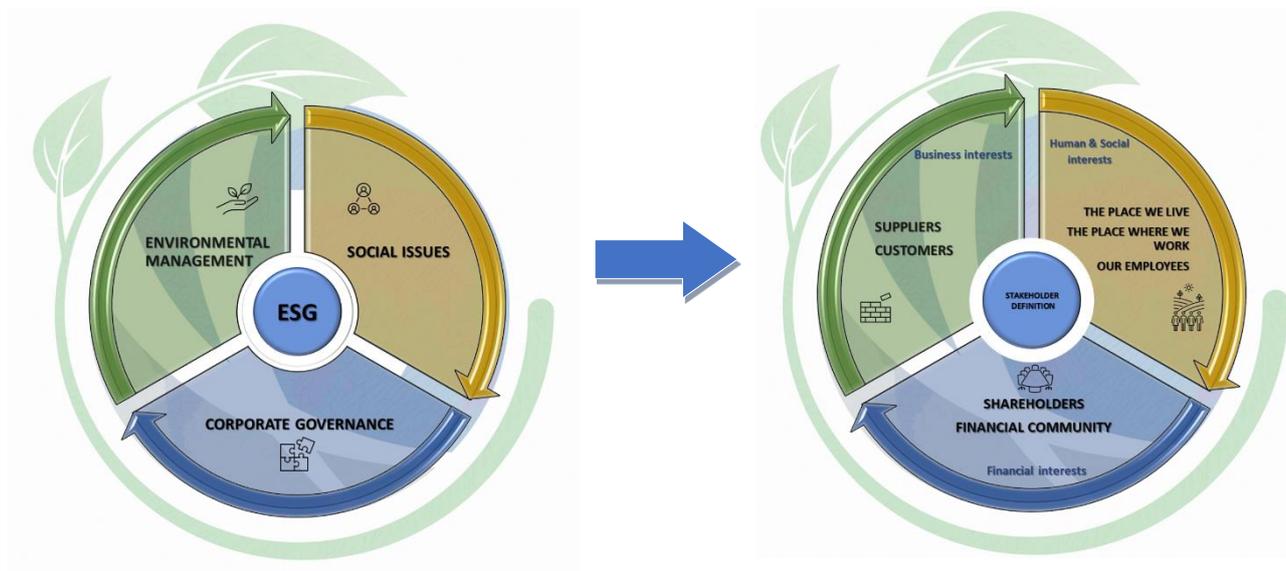
Based on these premises, our company could seize a great opportunity to offer the markets a new concrete and truly sustainable image and actions and strategies to improve it. We already have solid relationship with wide diversity in stakeholders: not only about business interests and opportunities as customers and suppliers, but also diversifying towards Research & Development investments to improve our innovation in know-how and technologies or financing social cooperative on territory surroundings to guarantee opportunities at less well-off people too that had hard trouble in their life.

Added to this vision we are working to build and set an ESG management which will include to improve all the areas that concerns a label of "Responsible business" through risks assessment about Environment (also if we already have ISO 14001), Governance and Social issues to reduce uncertainty in the long-term and capitalize on opportunities. We believe that improve these 3 areas and forecast future issues, we could optimize and improve our business too doing a positive compliance with nature and communities.

SOAG EUROPE SA strives to ensure the effectiveness of compliance programs in essential areas expects by international standards and protocol such as competition, anti-corruption, human rights, health & safety and labor. The system is incorporated into the constantly working to create a structured environment by a network of each Corporate Office (Quality, Operative & Controlling, Human Resources, Health & Safety, Research & Development, Purchases and Sales) and plant managers for implementing



these programs and monitoring their application. Guided by the Company's Ethic Code, this system fosters a culture of integrity within our Group and is intended to prevent ethical abuses liable to damage our financial position and reputation.



The place where we live is the world for everyone, for us is the environment, the different culture do by people, the local communities, the social activities, the compliance with the laws and regulations, for these reasons we propose to commit and align with the SDGs also on sight to improve our business taking real actions towards future generations.



# 3. GOVERNANCE

First of all passion for our work: this is the main key that guided the growth and expansion of our group. Our company made a decision to focus its energies in an enlarged Europe stretching from North Africa to Russia, commonly called EMEA (Europe, Middle East, and Africa). This has emerged as a mature but complex market, which has always represented the history of the Group.

## a. Competitiveness

In an increasingly global market, competitiveness has become one of the keys of success that we have been able to offer to our customers who can in turn offer to the market the same winning solutions. These results are possible only through continuous investment in the best available technology.

## b. Quality

It is almost a necessary condition, even if not sufficient, to operate in any market, including in the emerging markets. Despite the quality of the product has become a mandatory step to build successful relationships, now more and more attention is paid to the quality of the service offered, in terms of on-time delivery and speed in proposing new solutions, paying attention to the sustainability of factories and productions.

## c. Presence

Close proximity to the customer is fundamental. Thanks to SIGIT locations that are at a maximum distance of 1200 km from our customers in Europe, it is possible to reduce the transportation times to less than 24 hours. Close proximity to our customers also means that support is available during design and industrialization phases based on our know-how acquired over our fifty years of company history. But it is the passion that drives our employees every day in performing their daily work that is enabling the company to continue to be a leader in this market.

SOAG EUROPE SA group is a consolidated company with a share propriety by 40% belongs to National Industrial and Resources Company LLC, or rather the Oman Investment Authority (OIA), and the rest of 60% is of SIGIT.

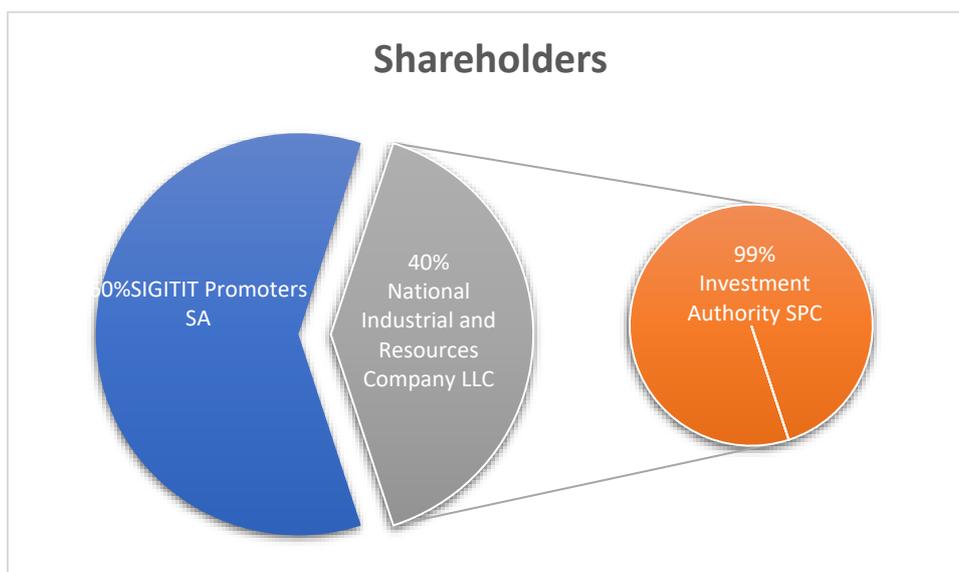


Figure 1: Shareholders of SOAG Europe Group

Top management is working hard on the following priorities:

- simplification of the chain of control: only one holding company (SOAG EUROPE SA);
- merger of the Group subsidiaries in the same Country (only one company per country).

In the medium term, top management wants to transform the SOAG Group from a Family Business Model to a Public Company Management Style, in order to become one of “the best in class” profitable Group companies.

The consolidated group of SOAG EUROPE SA represent the second level of consolidation because of the first level of consolidation is at SIGIT S.p.A., that is made up of SIGIT S.p.A., SIGIT Serbia, SIGIT Poland and SIGIT Morocco and prepared in accordance to IAS / IFRS. The third and last level of consolidation is at SOAG Oman level (SOAG Oman is the ultimate parent company of the Group). The Consolidated Financial Statements have been prepared using the Euro as the functional currency and all amounts have been rounded to the nearest thousand Euro, unless otherwise indicated.

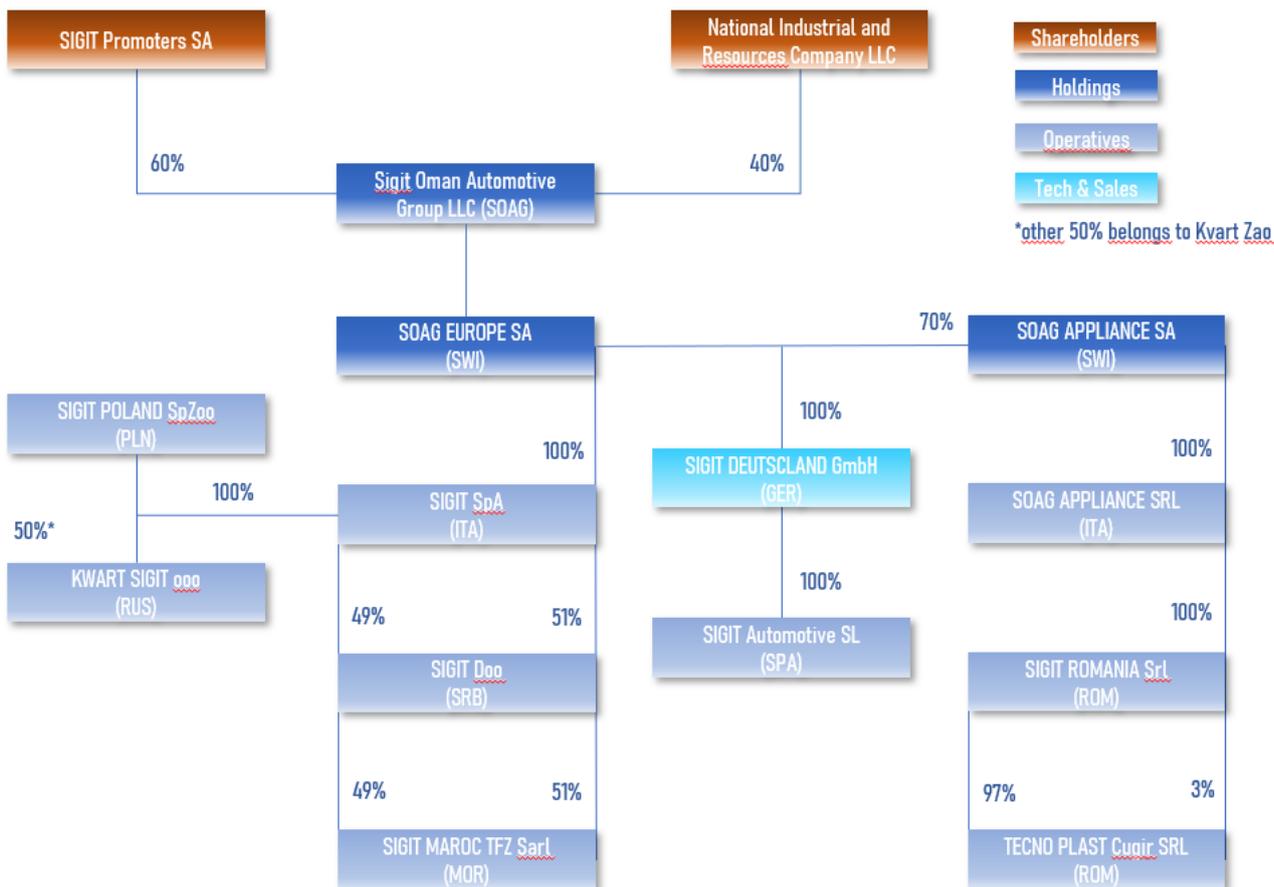


Figure 2: Organization structure with share % propriety

SOAG EUROPE SA have internal subdivision to produce semifinished products towards automotive and Small Domestic Appliance clients. We could indicate as SIGIT for the production of plastic and rubber semifinished materials for the automotive sector, while the second SOAG that deals with producing plastics for the domestic appliances sector.

Our headquarter is situated in Turin near the plants of Cambiano, one of the plants that operate to automotive that produce rubber components. The others are located in San Giustino, Lacedonia and Atesa that have plastic and thermoplastic production. Always for automotive semifinished there are plants abroad Kragujevac in Serbia, Tangeri in Morocco, Calatayud in Spain, Skoczow and Czechovice in Poland, and Kwart SIGIT a joint venture with 50% of participation in Russia. In the other hand there is production for domestic appliance that operate in plants of Monte San Vito in Italy, that produce plastic components with Cugir in Romania, instead Comunanza have aluminum molding processing.



## d. Vision

In the "2019 Directors' Report on Operations" we declared that for the first time it was really hard to write down some notes to the outlook for 2020, because it was a disaster year in terms of people's life. Economy, social relations, health and safety have been hit and upset in entire world. With "the return to normality" in 2021 everyone become more sensibility about these themes, maybe more than before. For these reasons we're restarting activities focusing us by social point of view, because each organization is done by people and the people are real force to get success.

The our main aim is to improve the social responsibility aspects of the company through the expansion and involve of our stakeholders to optimize activities and processes adding sustainability and ethics shared by people.

Sure will be some trouble situation to manage with the Suppliers and the Customers, and the solution will be found in an average between the demand of the Suppliers and the OEMs' concessions. During this time we will started to share the problems with all of our customers in order to find common solutions. In the meantime, another turbulence that will be an impact all 2021 is the semiconductors shortage. In 2021 the Group is focused on the ISC launch and in 3 new plants opportunities, the first in Morocco, in which we are proceeding to the new building plant, and in two new activities about the second plant in Romania to support the new Philips Coffee machines business and the third plant in Poland regarding some new business belonging to Stellantis. The Group in 2021-2022 is committed to investigating the market situation regarding possible acquisitions and additions that may be on the market both due to the financial crisis (in the wake of the pandemic) and to the natural corporate turnaround.





# 4. SECTORS

## a. Automotive

SOAG Group is one of the leaders in the EMEA region in the thermoplastic injection molding, offering tailored Automotive and Appliance components to the largest OEMs in these sectors. SOAG Group has a strong expertise in the manufacturing of Automotive components. The flexible and cost effective capabilities in full products manufacturing are the strengths of the Group.

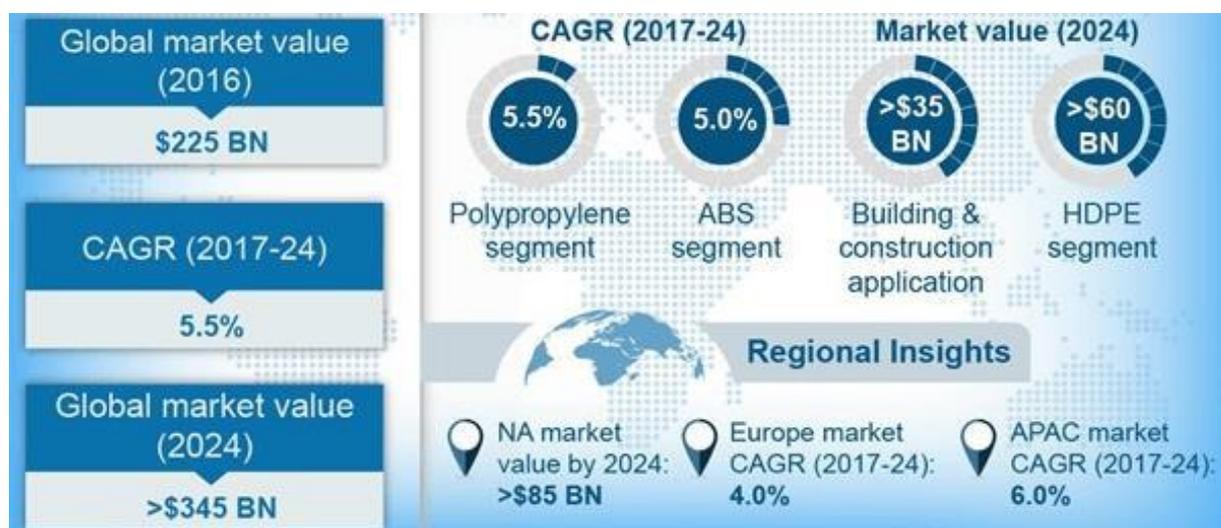


Figure 3: Forecast of polymeries production market

The automotive industry has been one of the most important growth engines for economic well-being in Europe, and based on this, it will likely be supported by all governments to remain a major market. The automotive sector will also have to contribute to environmental well-being, even if this may seem contradictory: initially investments in the sector could be slowed down and then observe a subsequent acceleration driven by technological innovation. The feeling is that the approach to driving is changing, In addition to greater attention to the impact of emissions, so that an evolution of mobility can be accompanied by sustainability thanks also to the regulatory measures to banned diesel and petrol by 2035 emanated by governments from the point of view of impacts. At the same time, however, the automotive industry had some success in maintaining the negative impact of the sector, thanks to the technical innovation that has made it possible to reduce exhaust emissions, despite the sharp increase in the number of cars. sold. With nearly 36% reduction in CO2 emissions since 1995, today's new European cars are much more efficient than cars 20 to 25 years ago. Over the same period, CO2 emissions per km from commercial vehicles fell by 14%. NOX emissions have been reduced by around



90% for new cars and by around 95% for commercial vehicles since the early. In the other hand, use and production of cars increased generating more pollution that continue to accumulate in metropolis and cities. For this reason the sector have to take an immediate action to change as soon as the use of vehicles and the kind of fuels. Though our contribute to impact in terms of emissions by vehicles isn't directly commensurate with the uses, but being that we produce plastic components as the parts of final product (car) we can give our contribute to reduce life cycle impact of the cars matching the energy transition of the transport sector.

## b. Appliance

SOAG is, also, one of the leading suppliers of plastic components in the Appliance and SDA parts (Small Domestic Appliance - coffee machines segment). To complete the products portfolio, SOAG Group has rubber injection molding plants and one aluminum diecasting plant.

The global home appliance market is a multi-billion dollar industry, led by big brands like Haier Electronics, Whirlpool, Electrolux and Bosch. Haier is the leading Chinese manufacturer in the sector, considered geographically as the rest of the world. In the western market, on the other hand, it is Whirlpool, an American-owned company that enjoys the highest local share in the household appliances sector. The most popular products in the appliance market include washers or dryers, refrigerators and freezers, coffee machines, air conditioners, radiators, televisions, recorders.

In recent years, more and more OEMs of "Smart Appliances" have appeared on the market and whose sales are obviously increasing thanks to the ongoing innovation process. Experts expect the Smart Appliance market to be followed for the profit margins that companies can make from it. Europe continues to be the second largest market in the world for large appliances, and around 114 million pieces of large appliances were sold in 2019, with a value of around 11 billion euros and around 135 million pieces for SDAs. equal to 8 billion euros. The key drivers of this sector are in fact changing older or obsolete devices with better performance in terms of energy consumption and the introduction of innovative and intelligent devices capable of operating autonomously and with the possibility of being connected to smart home systems. The recycling rate of large household appliances is 84% and for SDA it is 77%, and could be an excellent growth opportunity for the SOAG EUROPE SA Group.

## c. European plastic value chain

The European Environment Agency (EEA) estimated that have been produced 61,8 Million of tons of polymers along European plastic sector's value chain of which 5,1 Mt converted in products components to automotive and 3,2 Mt to parts for electronic/electric equipment as SDA market.



These polymers are materials as PP, LDPE, PVC, PET, PMMA, PA6, PA6.66, ABS which SOAG EUROPE SA processed and produce. In 2021 our plants generate about 0,0073 Mt of plastic components sold to automotive clients, contributing by 0,144% to this sector, while 0,0066 Mt of plastic is produced to domestic appliance clients contributing by 0,208% to parts electronic sector.

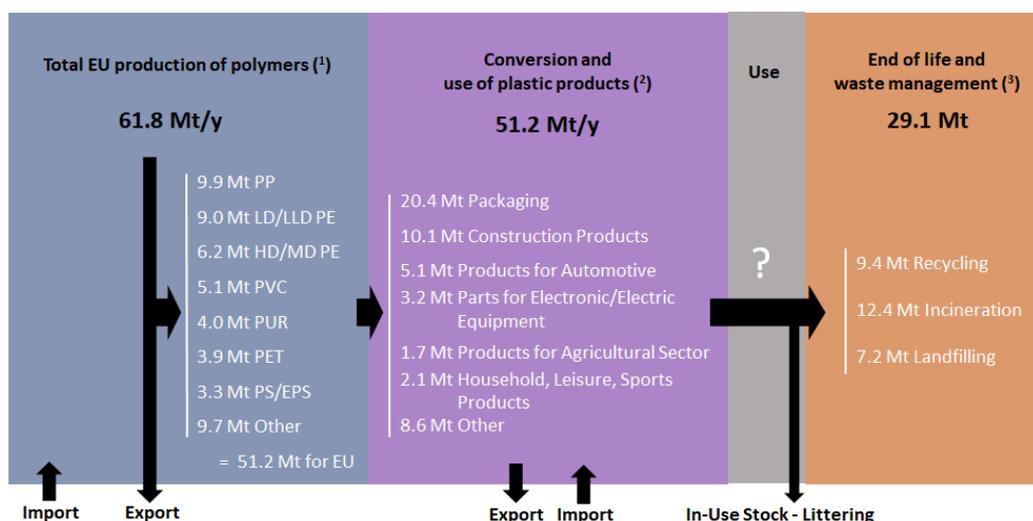


Figure 4: Material flows in the EU plastic value chain (source: Eionet Report – ETC/WMGE 2021/3).

Considering the material flows of our activities, SOAG EUROPE SA Group has purchased 0,017 Mt of materials of which:

- 0,0164 Mt plastic
- 0,0012 Mt rubber
- 0,0001 Mt aluminum

And sold about the same quantity, because we process and transform raw materials in semifinished components:

- 0,0141 Mt plastic
- 0,0019 Mt rubber
- 0,0002 Mt aluminum

These values are estimated considering that is included weight of packaging (plastic, paper and wood) that is often re-used to transport purchases or sold materials. The delta among incoming and outgoing materials is positive so it concerns that some purchased materials could be hold in company storehouse. However we suggest to deepen our internal analysis to individuate precisely weight of each incoming material categories and if it come from recycled or re-used components by supply chain and the same for packaging.



# 5. PLANTS & ACTIVITIES



For more than 50 years SIGIT is continuously developing new products in various market for different applications, thanks to a team of more than 50 internal engineers, supported by primary engineering partners. This incredible expertise collected year over year represent an unevaluable company asset.

SIGIT is nowadays able to support customers in automotive , appliance and food & beverage market with a non-comparable level of technical solutions combined with most advanced CAD, CAE tools and prototyping processes. To better support the customer SIGIT is also able to provide a full co-design in-house based or through resident engineers.

## a. Development process

SIGIT beside product development and as an added value to it perform molds development and manufacturing and all process related tasks to achieve customers' approval.

Three coordinated team grouped in "Project Manager", "Advance Quality", "Process Engineer" are responsible to manage more than 300 new components per year, working in a structured approach based on SIGIT Quality Management System. All the molds are under the responsibility of a team of "Tool Specialist" Tool Specialist that along with the own Italian based tool shop and external partners allow the company to properly manage such a considerable quantity of tools. ì

Our Italian based try-out center is responsible to test tools before transfer to the production site. Our process engineers have the responsibility to design the whole process; from injection to post processing and quality control gauges. Most of the production equipment and quality gages are in-house produced in our Serbia tool shop.

## b. Plastic

With more than 300 molding machines from 35 to 2000 tons, SIGIT represents one of the most relevant producer of thermoplastic components in the EMEA zone. The continuous improvement of the production processes combined with a large number of specific technologies and raw materials generate a unique offer to the customer.



A huge experience in a large number of “post-injection processes” is the key factor to excel in the supply not only of a one shot molded parts but also of a more complex product.

The whole process is controlled by a solid quality process control and further guaranteed by the specific tests performed in the quality laboratory, both for the raw material and components with accurate 3D or optical measurements and specific quality tests.

#### **c. Rubber**

With 31 machines from 180 to 450 tons , located in Italy , Russia and Morocco, SIGIT is able to provide a wide range of products for the automotive industry and the home appliance industry

The whole process is controlled by a solid quality process control and further guaranteed by the specific tests performed in the quality laboratory, both for the raw material and components with accurate 3D or optical measurements and specific quality tests.

#### **d. Aluminum**

With 8 die-casting machines from 320 to 1000 ton, fully equipped with robots to make the process full automatic, SIGIT is able to provide a wide range of product both in the automotive and appliance market.

SIGIT can complete the support to the customer with a wide range of mechanical post operations, executed in the machining department. The whole process is controlled by a solid quality process control and further assured by the specific test performed in the quality laboratory, both for the raw material through quant metric analysis, and for components with accurate 3D measurements, X-rays or analysis thermographic.

#### **e. What we offer**

SOAG EUROPE SA productivity is focused on plastic and rubber molding to generate semifinished that have to assembling in other processes by clients of automotive and Small Domestic Appliance. The Group porpoise wide services and process to product components to its customers and it has different kind of technologies. Which are our services that we offers:

- Jig, secondary tools and quality gauge;
- Poka-yoke system;
- Process automation;
- Assembly line;
- Optical control;
- SIGIT manufacturing standards



- Implementation and innovation labs.

#### Processes:

- Painting (2 equipment in Romania, of which one manual and other automatic);
- Metallization;
- Chrome plating;
- Automatic and robotized assembly and testing;
- Assembly and testing with electronics parts;
- Vibration, ultrasonic and roto-friction welding;
- Pad printing, screen printing;
- Hot transfer;
- Laser marking;
- Sonderhoff extrusions line.

#### Molding technologies:

- Gas molding;
- IMD molding;
- 2K molding;
- Heat and cool technology;
- Over and metal inserts.



Below we report main machineries and technologies we have In each plant to process our activities:

Nation	Plant code	City	M2		Machineries and technologies				
			Indoor	Outdoor	1	2	3	4	5
ITA	S000	ISC	3.500		Headquarter				
	S002	Cambiano	3.900	4.311	Rubber molding	Cutting gaskets	Secondary machineries		
	S005	San Giustino	2.900	3.600	Plastic molding	Secondary machineries			
	S006	Lacedonia	6.000	4.000	Plastic molding	Die-cut	Welding	Assembly bench	
	S007	Atessa	12.300	4.700	Plastic molding	Die-cut	Welding + ultrasonic welding	Assembly bench	Sealing machine
	SA01	Monte San Vito	16.000	10.000	Plastic molding	Ultrasonic welding	Assembly machines	Cutter	Silkscreen/ pad painting
	SA02	Comunanza	6.000	34.000	Aluminium molding	Mechanical processing			
PLN	PL01	Skoczow	10.000	3.520	Plastic molding	Welding + ultrasonic welding	Sealing machine	Die-cut	Secondary machines
	PL02	Czechowice	4.620	8.260	Plastic molding	Ultrasonic welding	Assembly machines	Pad painting	Cutter
SRB	SR01	Kragujevac	13.000	22.800	Plastic molding	Welding	Cutter		
MOR	MR01	Tanger	7.600	400	Rubber molding	Plastic molding	Assembly bench		
SPA	ES01	Calatayud	12.000	18.000	Plastic molding	Cutter			
ROM	RM01	Cugir	10.700	13.700	Plastic molding	Ultrasonic welding	Painting	Pad painting	

Table 1: Machineries and technologies of SOAG Europe's plants

Many of our plants sited in Italy, but we have others in Europe and one in Morocco that allow commercial interactions with entire EMEA market among suppliers and clients.

#### Headquarters and Commercial offices

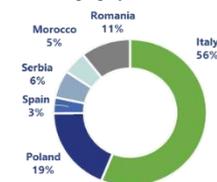
The operational headquarter is based in **Switzerland**, through the fully-owned subsidiary SOAG Europe SA. Additional sales and representative offices are located in **Italy** and **Germany**.

#### Production plants

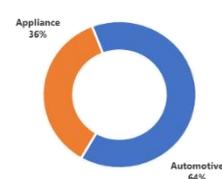
SOAG international growth followed the best OEMs towards Eastern Europe and best-cost countries. As a result of the strategy "going local-for-locals", the Group production facilities have been located **at most 1,200km away from customers with a transportation time that does not exceed 24 hours**.



Revenues geographic breakdown FY19



Business breakdown FY19





Below we report some data about employees and activities for each plant in 2021:

### CAMBIANO S002

<b>TOTAL EMPLOYEES of which:</b>	51
Direct Personnel	33
Indirect Personnel	18
<b>Rubber Injection Machine</b>	
Tonn	From 180 to 450

### SAN GIUSTINO S005

<b>TOTAL EMPLOYEES of which:</b>	48
Direct Personnel	24
Indirect Personnel	14
<b>Injection Molding Machine</b>	
Tonn	From 80 to 600
Technologies	2k –Overmoulding
<b>Post Processing</b>	
Assembly line Automatic and Manual	Yes
<b>Others</b>	
Laboratory	Yes

### LACEDONIA S006

<b>TOTAL EMPLOYEES of which:</b>	49
Direct Personnel	36
Indirect Personnel	13
<b>Injection Molding Machine</b>	
Tonn	From 330 to 1300
Technologies	2k - Overmoulding
<b>Post Process</b>	
Ultrasonic welding	Yes
Vibration welding	Yes
Assembly Automatic and Manal	Yes



## ATESSA S007

<b>TOTAL EMPLOYEES of which:</b>	120
Direct Personnel	72
Indirect Personnel	48

<b>Injection Molding Machine</b>	
Tonn	From 90 to 1300
Technologies	2k – Gas injection – Overmoulding

<b>Rubber extrusion</b>	
Automatic extrusion polyurethan seals	Yes

<b>Post Process</b>	
Vibration Welding Machine	Yes
Ultrasonic Welding machine	Yes
Assembly Automatic and Manal	Yes

## SKOCZOW PL01

<b>TOTAL EMPLOYEES of which:</b>	310
Direct Personnel	220
Indirect Personnel	90

<b>Injection Molding Machine</b>	
Tonn	From 90 to 1300
Technologies	2k – Gas injection – Overmoulding – Heat & Cool

<b>Post Process</b>	
Vibration Welding Machine	Yes
Assembly Automatic and Manual	Yes
Sealer	Yes



## CZECHOVICE PLO2

<b>TOTAL EMPLOYEES of which:</b>	<b>136</b>
Direct Personnel	72
Indirect Personnel	64
<b>Injection Molding Machine</b>	
Tonn	From 80 to 1.300
Technologies	2k – Gas injection - Overmoulding
<b>Post Processing</b>	
Vibration Welding Machine	Yes
Ultrasonic Welding Machine	Yes
Tampo printing machine	Yes
Assembly line Automatic and Manual	Yes
<b>Others</b>	
Laboratory	Yes

## KRAGUJEVAC SR01

<b>TOTAL EMPLOYEES of which:</b>	<b>117</b>
Direct Personnel	105
Indirect Personnel	112
<b>Injection Molding Machine</b>	
Tonn	From 130 to 2.000
Technologies	2k – Gas injection - Overmoulding
<b>Post Processing</b>	
Ultrasonic Welding Machine	Yes
Carpet Bonding	Yes
Assembly line Automatic and Manual	Yes
<b>Others</b>	
Laboratory	Yes



## TANGER MRO1

<b>TOTAL EMPLOYEES of which:</b>	65
Direct Personnel	40
Indirect Personnel	25

<b>Injection Molding Machine</b>	
Tonn	From 190 to 650
<b>Rubber Injection</b>	
Tonn	From 300 to 400
<b>Post Process</b>	
Assembly Automatic and Manual	Yes

## CALATAYUD ES01

<b>TOTAL EMPLOYEES of which:</b>	160
Direct Personnel	50
Indirect Personnel	110

<b>Injection Molding Machine</b>	
Tonn	From 130 to 2.000
Technologies	2k – Gas injection - Overmoulding
<b>Post Processing</b>	
Vibration Welding Machine	Yes
Ultrasonic Welding Machine	Yes
Hot Plate welding Machine	Yes
Assembly line Automatic and Manual	Yes
<b>Others</b>	
Laboratory	Yes
Milling with Robot	Yes



## MONTE SAN VITO SA01

<b>TOTAL EMPLOYEES of which:</b>	<b>165</b>
Direct Personnel	96
Indirect Personnel	69

<b>Injection Molding Machine</b>	
Tonn	From 35 to 1.500
Technologies	2k – Gas injection - Overmoulding

<b>Post Processing</b>	
Vibration Welding Machine	Yes
Ultrasonic Welding Machine	Yes
Tampo Printing Machine	Yes
Screen Printing Machine	Yes
Assembly line Automatic and Manual	Yes
<b>Others</b>	
Laboratory	Yes

## COMUNANZA SA02

<b>TOTAL EMPLOYEES of which:</b>	<b>37</b>
Direct Personnel	23
Indirect Personnel	14

<b>Die Casting Machine</b>	
Tonn	From 320 to 1.000
<b>Others</b>	
Laboratory	Yes



## CUGIR RM01

<b>TOTAL EMPLOYEES of which:</b>	<b>263</b>
Direct Personnel	176
Indirect Personnel	87
<b>Injection Molding Machine</b>	
Tonn	From 40 to 1.000
Technologies	2k – Overmoulding
<b>Post Processing</b>	
Vibration Welding Machine	Yes
Ultrasonic Welding Machine	Yes
Tampo Printing	Yes
Painting Line Automatic	Yes
Assembly line Automatic and Manual	Yes
<b>Others</b>	
Laboratory	Yes



# 6. FINANCIAL STATEMENT

The Consolidated Financial Statements as at December 31 2021 and for the year then ended have been prepared on a going concern basis, since the Directors have verified that there are no financial, operational or other types of indicators that could affect the Group ability to meet its obligations in the

foreseeable future and, in particular, in the next twelve months. It has been prepared in accordance to the International Financial Reporting Standards (IFRS), issued by the International Accounting Standards Board (IASB) and approved by the European Union at December 31 2021, as well as all the revised accounting standards (IAS) and all the interpretations of the International Financial Reporting Interpretations Committee (IFRIC), formerly the Standing Interpretations Committee (SIC). The Consolidated Financial Statements of SOAG EUROPE SA represent the second level of consolidation at SOAG Group. The first level of consolidation is at SIGIT S.p.A., that is made up of SIGIT S.p.A., SIGIT Serbia, SIGIT Poland and SIGIT Morocco and prepared in accordance to IAS / IFRS too. The third and last level of consolidation is at SOAG Oman level (SOAG Oman is the ultimate parent company of the Group). The Consolidated Financial Statements have been prepared using the Euro as the functional currency and all amounts have been rounded to the nearest thousand Euro, unless otherwise indicated.



The Consolidated Financial Statements consist of the Statement of Financial Position, the Income Statement, the Statement of Other Comprehensive Income, the Statement of Changes in Equity, the Statement of Cash Flows and the Explanatory Notes, alongside with the Directors' Report on Operations.

The format adopted for the Statement of Financial Position classifies assets and liabilities as current and non- current. In particular:

- non-current assets reflect items that are typically realized after twelve months and include intangible assets, property, plant and equipment and financial assets;



- current assets include items that are typically realized within twelve months;
- non-current liabilities consist of items falling due after twelve months, including borrowings, provisions and the employee benefit obligations;
- current liabilities include payables falling due within twelve months.

The Group has opted to present the components of profit or loss for the year in a separate Income Statement, rather than include these components directly in the Statement of Other Comprehensive Income. The scheme of Income Statement adopted by the Group classifies costs by nature. The Statement of Other Comprehensive Income includes the result for the period and, for homogeneous categories, the revenues and costs which, in accordance with IFRS, are recognized directly in equity. The Statement of Changes in Equity sets forth, in addition to total gains / losses for the period, the amounts of transactions with equity holders and the changes in the period of the retained earnings.

In the Statement of Cash Flows, the cash flows deriving from operating activities are presented using the indirect method, according to which the gains or losses for the period are adjusted by the effects of non-monetary items, by any deferment or accrual of past or future operating receipts or payments, and by any revenue or cost items connected with the cash flows arising from investing activities or financing activities.

#### **a. Scope and method of consolidation**

The scope of consolidation includes the subsidiaries, the associates and the joint arrangements. For consolidation purposes, the financial statements of the companies included in the scope of consolidation, prepared at the reporting date of the financial statements of the Parent Company, are adjusted to conform to the IAS / IFRS principles, as applied by the Group.

#### **b. Subsidiaries**

Subsidiaries are defined as all the companies held over, which the Group has, at the same time:

- power over the investee, meaning it has existing rights that give it the current ability to direct the relevant activities (i.e. the activities that significantly affect the investee's returns);
- exposure, or rights, to variable returns from its involvement with the investee;
- the ability to use its power over the investee to affect the amount of its returns.

The financial statements of subsidiaries are included in the Consolidated Financial Statements beginning on the date when control is acquired until the time when control ceases. Non-controlling interests in equity and net income (loss) are separately indicated on the consolidated Statement of



Financial Position and Income Statement. Subsidiaries are consolidated on a line-by-line basis, according to which:

- the assets, liabilities, revenues, and expenses in the Financial Statements of subsidiaries are recognized in their full amounts, regardless of the percentage of ownership;
- the carrying amount of investments is eliminated against the underlying share of equity;
- the financial and operating transactions between companies consolidated on a line-by-line basis, including dividends distributed within the Group, are eliminated;
- equity and income (loss) attributable to non-controlling interests are presented separately in the Statement of Financial Position and Income Statement;
- upon disposal of an investment with consequent loss of control, the gain or loss from that disposal takes into account the goodwill that may be allocated to the investee;
- in the case of further interests acquired after acquisition of a controlling interest, any difference between the purchase cost and the corresponding fraction of acquired equity is recognized in equity. Likewise, the effects of disposing non-controlling interests without loss of control are also recognized in equity.

### c. Holding & management companies

#### i. SOAG EUROPE SA

SOAG EUROPE SA is the Parent Company of the Group. In 2021, the company posted revenues for a total amount of Euro 3,6 million (Euro 2,9 million in 2020), totally related to the services provided to the Group companies. Loss for the year amounted to Euro 530 thousand. In 2020 the loss was equal to Euro 2,1 million, mainly due to the provisions accounted for the loss occurred at the subsidiary SIGIT Automotive (about Euro 2'470 thousand). 2021 negative performances were impacted by a loss on exchange rates amounted to Euro 388 thousand, due to the depreciation experienced by the Euro against the USD (original currency of part of the total borrowings granted by its sole Shareholder, SOAG Oman, in 2015). Employees included in the payroll as at December 31, 2021 and December 31, 2020 were 12.

#### ii. SOAG Appliance SA

SOAG Appliance SA is a pure holding company, established in 2017 to manage the acquisition of the Tecno Plast Group companies from bankruptcy procedure. In 2021, the company posted a loss amounting to Euro 16 thousand, mainly due to costs for services (compared to a loss by Euro 33 thousand as at December 31, 2020).



### iii. SIGIT Romania

SIGIT Romania S.r.l. is a pure holding company, established in the first quarter of 2018 to manage the acquisition of Tecno Plast Cugir S.r.l.. In 2021, the company posted a profit amounting to Euro 1'863 thousand, including dividends by Tecno Plast Cugir equal to Euro 2 million.

## d. Service companies

### i. SIGIT Deutschland

SIGIT Deutschland is a full captive company, focused on supporting the Group on technical and commercial activities, consolidating the relationship with the German car manufacturers.

The Company charges the cost incurred (mainly personnel costs) to SIGIT S.p.A. (its sole customer) on the basis of specific Transfer Pricing rules. In 2021, the company posted a profit amounting to Euro 12 thousand (compared to a profit by Euro 27 thousand occurred in 2020). There were 4 employees on the payroll at the end of the 2021 (same as in 2020).

## e. Industrial companies

### i. SIGIT Italy (S002, S005, S006, S007)

In 2021, revenues from sales of goods and services (including intercompany transactions) amounted to Euro 59'921 thousand, increasing by approximately Euro 4'244 thousand compared to 2020 (Euro 55'267 thousand). Profit for 2021 amounted to Euro 1'545 thousand; in 2020, profit was equal to Euro 1'864 thousand. In 2021, as well as in 2020, Fiat Chrysler Automobile (hereinafter "FCA") was the most important customer. Employees included in the payroll as of December 31, 2021 were 302 (compared to 311 as at 31 December 2020).

### ii. SIGIT Poland (PL01, PL02)

In 2021, revenues from sales of goods and services (including intercompany transactions) reported by the Polish subsidiary amounted to Euro 31'885 thousand, increasing by about Euro 3,9 million if compared to 2020, thanks to the contribution of the projects acquired from Volkswagen Group in previous years, entered, in 2021, in their ramp-up curve. In 2021, loss for the year was equal to Euro 4'244 thousand; in 2020 SIGIT Poland showed a loss by Euro 2'288 thousand. The year 2021 was affected by some inefficiencies related to the startup of the new plant based in Czechowice-Dziedzice. In 2021, as well as in 2020, the most important customers of the company were Volkswagen, Whirlpool,



FCA, Electrolux and some Tier 1 customers. Employees included in the payroll as at December 31, 2021 were 394 (386 as at 31 December 2020).

iii. SIGIT Serbia (SR01)

In 2021, revenues from sales of goods and services (including intercompany transactions) amounted to Euro 17'720 thousand and net profit of the year was equal to Euro 251 thousand (compared, respectively, to Euro 14'150 thousand and a loss of Euro 240 thousand). The significant increase in revenues in 2021 (about Euro 3,6 million) was mainly due to the start-up phase of new projects, the most significant with Porsche. Employees included in the payroll as at the end of the 2021 were 221 (they were 232 as at 31 December 2020).

iv. SIGIT Morocco (MR01)

In 2021, revenues from sales of goods and services (including intercompany transactions) amounted to Euro 5'284 thousand, net loss for the year amounted to Euro 1'226 thousand (compared to, respectively, Euro 5'689 thousand and Euro 3 thousand in 2020). The reason behind the drop of revenues was connected to the lower sales towards the customer Renault, whose project have entered in the late stage of its lifecycle. Employees included in the payroll as at December 31, 2021 were 68 (compared to 95 as at 31 December 2020).

v. SIGIT Spain (ES01)

In 2021 revenues from sales of goods and services amounted to Euro 14'046 thousand (Euro 8'248 thousand in 2020). Intercompany revenues in 2021 amounted to Euro 124 thousand approximately; they were equal to Euro 120 in 2020. In 2021, the company posted a loss amounting to Euro 340 thousand; in 2020, the loss was equal to Euro 2'471 thousand. The company is expected to recover revenues and profitability in 2022, thanks to the development of the project with SEAT, which started in the 2019. Employees included in the payroll as at the end of 2021 were 137 (compared to 145 as at 31 December 2020).

vi. SOAG Appliance Italia (SA01, SA02)

In 2021 revenues from sale of goods and services (including intercompany transactions) amounted to Euro 33'498 thousand. In 2020 they were Euro 33'647 thousand. Net profit for the year ended December 31, 2021 was equal to Euro 579 thousand; in 2020, the company posted a loss by Euro 54 thousand. Both in 2021 and in 2020, Whirlpool Group was the most important customer, followed



by FCA, since the Company started a new project in the Automotive market in 2020. Employees included in the payroll as at December 31, 2021 were 191 (they were 196 last year).

vii. Tecno Plast Cugir (RM01)

In 2021 revenues from sales of goods and services (including intercompany transactions) amounted to Euro 24'529 thousand (they were Euro 19'908 thousand in 2020). In 2021, the company posted a profit amounting to Euro 3'851 thousand; in 2020, the profit was equal to Euro 3'343 thousand. Key clients are Philips, Magneti Marelli and Electrolux. Employees included in the payroll as at December 31, 2021 were 246 (compared to 245 as at 31 December 2020).

f. KVART SIGIT Russia

In Russia the Group, through the joint venture KVART SIGIT, operates in the household appliances sector, as a supplier of Whirlpool and Beko. In 2021, revenues of KVART SIGIT, a company consolidated with the equity method, amounted to approximately Euro 2,2 million, compared to Euro 1,9 million in 2020.

<i>(amounts in Euro/000)</i>	<b>2021</b>	<b>% on rev.</b>	<b>2020</b>	<b>% on rev.</b>	<b>Var.</b>	<b>Var. %</b>
Revenues from sales	176'814	99,5%	151'937	99,3%	24'877	16,4%
Other income	929	0,5%	1'128	0,7%	(198)	-17,6%
<b>Total revenues</b>	<b>177'743</b>	<b>100,0%</b>	<b>153'065</b>	<b>100,0%</b>	<b>24'679</b>	<b>16,1%</b>
Raw materials (change in inventories included)	(92'615)	-52,1%	(75'077)	-49,0%	(17'538)	23,4%
Cost for services	(26'928)	-15,3%	(24'850)	-16,2%	(2'078)	8,4%
Personnel costs	(44'079)	-24,8%	(38'062)	-24,9%	(6'017)	15,8%
Other operating costs	(1'477)	-0,8%	(1'198)	-0,8%	(279)	23,3%
<b>EBITDA</b>	<b>12'645</b>	<b>7,1%</b>	<b>13'878</b>	<b>9,1%</b>	<b>(1'234)</b>	<b>-8,9%</b>
Depreciations, amortisations and impairment	(10'165)	-5,7%	(9'216)	-6,0%	(949)	10,3%
<b>EBIT</b>	<b>2'479</b>	<b>1,4%</b>	<b>4'662</b>	<b>3,0%</b>	<b>(2'183)</b>	<b>-46,8%</b>
Financial income (expenses)	(1'626)	-0,9%	(1'901)	-1,2%	275	-14,5%
Net gains (losses) on exchange rates	(468)	-0,3%	(708)	-0,5%	240	-33,9%
<b>Net income before taxes</b>	<b>385</b>	<b>0,2%</b>	<b>2'053</b>	<b>1,3%</b>	<b>(1'668)</b>	<b>-81,2%</b>
Taxes (deferred taxes included)	(283)	-0,2%	(1'289)	-0,8%	1'007	-78,1%
<b>Net Income</b>	<b>102</b>	<b>0,1%</b>	<b>764</b>	<b>0,5%</b>	<b>(661)</b>	<b>-86,6%</b>

Table 2: Highlights the main items of the Consolidated Income Statement for the year ended December



# 7. PARTNERSHIPS

17 PARTNERSHIPS FOR THE GOALS



## a. United Nations Global Compact

Since 2015 SIGIT (SOAG) is a member of the principles of the UNGC United Nations



Global Compact. Responsible business and investment, rooted in universal principles, will be essential to achieve transformational change through the SDGs. For SOAG Europe, a successful implementation will strengthen the favorable

environment for doing business and building competitiveness around the world. An efficient organization in a company requires stable economies and healthy, skilled and educated workers, among other factors. Sustainable companies experience greater confidence in joining the UNGC by engaging more investors. It is also good for the community when the business truly makes a difference by offering new ideas and solutions that scale society's challenges: exactly what we need to create a better world. This alliance is based on shared goals that help extreme poverty, address labor problems, reduce environmental risks around the world by including all necessary actions to achieve the 17 SDGs.

## b. ANFIA



With 400 member companies, ANFIA (National Association of the Automotive Industry) is one of the largest trade associations in Italy. Founded in 1912, for over 100 years it has had the objective of representing the interests of the Associates towards public and

private, national and international institutions and of providing for the study and resolution of technical, economic, fiscal, legislative, statistical and quality of the automotive sector. The Association is structured into 3 product groups, each coordinated by a President:

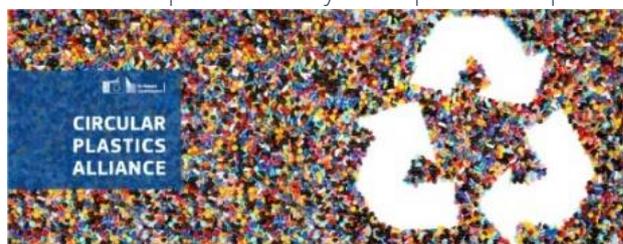
- Components: includes automotive parts and components manufacturers;
- Car Design & Engineering: includes companies operating in the design, engineering, style and design of motor vehicles and/or parts and components for the automotive sector;
- Manufacturers: includes vehicle manufacturers in general (including trucks, trailers, campers, special vehicles and/or vehicles dedicated to specific uses) or specific fittings and equipment mounted on vehicles.



SOAG's Chairman, Pierangelo Decisi, contributes actively in ANFIA with the role of vice-President in Components Group. This collaboration is a real capable of representing and offering services to stakeholders of the sector to support and strengthen their competitiveness, growth in foreign markets, and integration into mobility systems, through relations with national and international institutions and networking, participation in technical-regulatory committees, study and analysis of the sector, through training and consultancy. The topical issues towards which the supply chain represented by ANFIA pays the utmost attention and on which ANFIA actively intervenes concern the macro areas of mobility, safety, the environment, energy, research and internationalization.

### c. Circular Plastic Alliance

The Circular Plastics Alliance is an European Strategy for Plastics open voluntary to all public and private actors from European plastics value chains that are ready to actively contribute to delivering on the declaration of the alliance. There are currently 311 signatories. SOAG EUROPA SA had joined the alliance signing the declaration, committing it to the alliance's shared vision and to contributing to its operational work. The Group follows the working rules and competition compliance policy taking the commitment to boost the EU market for recycled plastics up to 10 million tonnes by 2025.



### d. Torino Social Impact

Torino Social Impact is an open platform to which over 200 companies, institutions, financial operators and third sector entities have joined by signing a Manifesto aimed at pooling ideas, experiences, projects and resources to catalyze and attract forms of entrepreneurship that, taking advantage of new technological opportunities, they aim to solve emerging social problems through economically sustainable business models. SOAG EUROPE SA submitted since 2017 to improve young know-how and social activities on its local communities.



### e. API

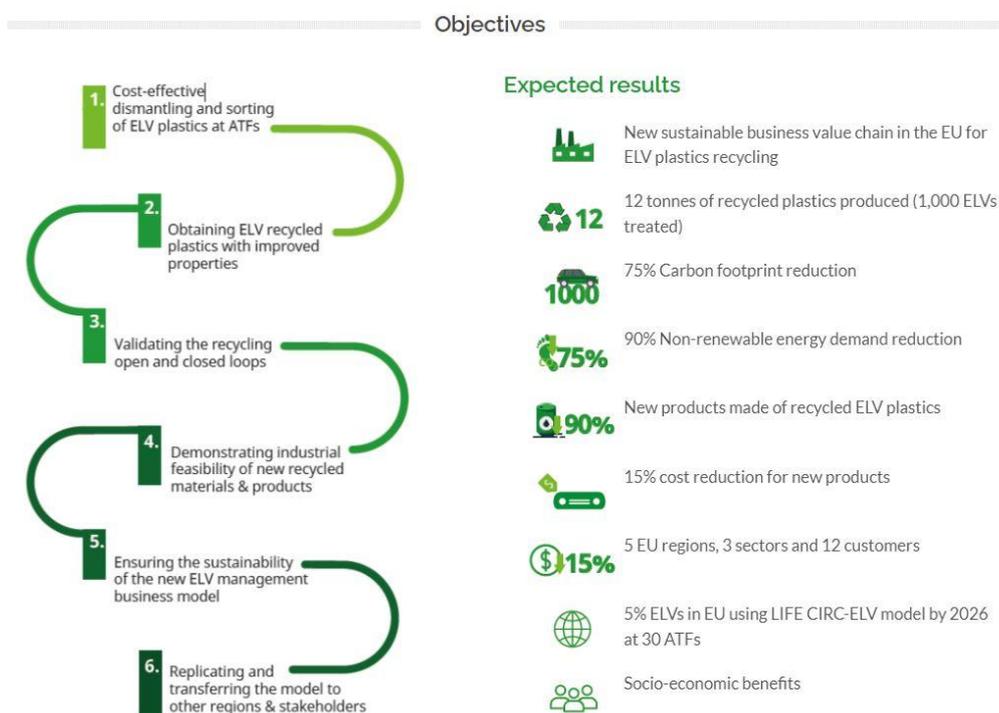
SOAG EUROPE SA submitted API, that with 1,800 associates, is alongside entrepreneurs and manufacturing and service companies of different types and sizes, and represents their rights and needs in all institutional tables as well as towards trade unions, research bodies and more broad economic and social system.





## f. LIFE CIRC-ELV

LIFE CIRC-ELV is aimed at boosting a resource-efficient circular economy in the automotive sector by enhancing ELV management to increase the plastic recycling rates in a cost effective way and resulting in recycled plastics with suitable quality for new market applications. The project will contribute to achieve the ELV recycling targets set by EU legislation, while closing the loop for plastics and helping to reduce fossil resource depletion and derived impacts. SOAG EUROPE SA is among the enterprises that together collaborate and contribute to follow CIRC-ELV's path and objectives:



The contribute of the Group is to offer totally recycled plastic components to own automotive customers and to allow reducing of vehicle's Carbon Footprint too.





# 8.ETHIC



While SOAG EUROPE SA continues to grow and succeed, the commitment of our society for ethical conduct must become our main driver. SOAG is entering new markets and expanding its business year after year, it is our duty, observe the highest standard of ethical conduct. Our Ethics Code define the set of values and general principles of behavior and conduct, relevant for SOAG, for the purposes of:

- proper functioning of the Group;
- the reliability of the Group and of the people who work in the Group;
- compliance with laws and regulations of each Country in which the Group operates;
- as well as the reputation of the Group towards third parties and all its stakeholders.

The “Global Ethic Code” of our group has been approved by the Board of Directors dated 01.16.2018 must be understood as an integral part of the Organization and Management of the Company and therefore applies to all companies linked to it. We commit to improve our vision to loyal and capable company to pursue wherever we work in the world and with whom. This is what we want to hand down to the future generations. To ensure these values, which we believe are a competitive advantage, it is important that each of us in SOAG believes, knows, understands and adheres to this, which must become the lowest common denominator behind our decisions, actions and thoughts. While SOAG continues to grow and succeed, the commitment of our society for ethical conduct must become our main driver.

SOAG is entering in new markets and expanding its business year after year. It is our duty, therefore, to consolidate and make known our excellent standards of conduct. It is essential that our employees - the new ones as well as the most experienced ones - know, apply and develop this modus operandi that has seen us growing and improving our technologies during these years.

The ethical behavior of every employee of SOAG is an essential starting point for our commitment toward the true corporate sustainability. We act to ensure the success and longevity of our society, for the benefit of our customers, suppliers, shareholders, employees and the communities within which we operate. We are working into the world, the world we will leave to our children and to future generations. We would like the world we will leave, to be better than the one we had. Our uncompromising ethics is the first step to do this.

The SOAG Group “Global Ethic Code” sets out those principles to which all SOAG employees must adhere, wherever they work and in all circumstances. We can't compromise our goal due to a lack of knowledge and sharing of this code. The materialization of our ideals passes not only through the overt ability to provide products and quality services, but also through our integrity and our high ethical



standards. Only in this way can we give a contribution to sustainable development. The Group believe in ethics, which becomes the foundation of the quality of life, quality in life, quality in choices. This becomes not only a quality product, but a world which increases in quality. This code simply wants to be a guide for our actions. For this reason, we have to spread it first in the whole SOAG world.

Here are the drivers that must move us into everyday life:

- providing goods and services that meet the needs of our customers and our company;
- offering to all our employees a working environment that is safe, healthy and rewarding;
- contributing to the welfare of all countries and communities within which we operate, by virtue of our social responsibility;
- respecting of environment around us and using it as if it was not ours, but as an asset entrusted to us with the task to hand it down to future generations in a better and more livable condition;
- offering to our shareholders a return on investment of higher quality and therefore worthy of pride;
- let's set immediately a good example. Let us be aware of our goal and responsibility that each of us has for the success of the common results.

Our Ethic Code is intended to ensure that all members of SOAG EUROPE SA, consistent with the guidelines established by AIAG. We commit to pursue the objectives with loyalty, honesty, reliability, know-how, transparency in compliance with current laws, building a better future for our Company and the communities in which it operates. SOAG shares and includes in its Ethic Code the principles of the United Nations "Universal Declaration of Human Rights" and supports the Ten Principles of the "United Nations Global Compact".

#### a. Organizational format of enterprise based on Italian law 231/2001

SIGIT SPA has joined at Italian law 231/2001 and subsequent modifies and integrations on administrative liabilities. Premise that SIGIT SPA is only a part of group, but the main in historical background of the company, the others enterprise that are consolidated into holding SOAG EUROPE SA are indirectly bonded to commit and pursue articles of law 231/2001.

The Italian Legislative Decree 8 June 2001 n. 231 introduced administrative liability of entities for the first time in our system. The new legislation provides, in fact, the responsibility, cd. administrative, of entities (by this also meaning companies, including those set up in the form of a company) for a very specific series of crimes committed, in their interest or advantage, by certain subjects, supervisors, employees or even if only in a functional relationship with the entity itself. Interest and advantage are



elements required in an alternative form: the first indicates the finalistic projection of the conduct, the second refers instead to the result actually achieved.

This form of responsibility, mind you, is added to that of the natural person who materially committed the illegal act.

It should be noted that the administrative liability of the entity arises when the conduct has been carried out by subjects linked to the entity by functional relationships, which are identified by law in two categories:

- that pertaining to the "subjects in the so-called top position", that is the top management of the company (people who hold representative, administrative or management functions of the entity or one of its organizational units with financial and functional autonomy as well as by persons who exercise, even de facto, the management and the control of the entity itself);
- that concerning "subjects subject to the direction of others".

The law exempts the entity from liability if it proves that it has adopted and effectively implemented, before the commission of the offense, organizational, management and control models suitable for preventing the carrying out of the criminal offenses considered; this exemption operates differently depending on whether the crimes are committed by persons in top positions or persons subject to the management of the latter. Regarding the hypothesis of crimes committed by subjects in "top management" positions, the exclusion of liability requires that:

- the Management Body has adopted and effectively implemented, before the offense was committed, organizational and management models suitable for preventing crimes of the type that occurred;
- the task of supervising the functioning and observance of the models and ensuring their updating has been entrusted to a body of the entity with autonomous powers of initiative and control (so-called Supervisory Body);
- the persons have committed the crime by fraudulently evading the organization and management models;
- there was no omission or insufficient supervision by the body referred to in the second point.

In the case of crimes committed by subordinates, the liability of the entity is triggered if there has been a failure by the company to comply with the obligations of management and supervision. Such non-compliance is excluded by the law if the entity, prior to the commission of the offense, has adopted and effectively implemented an organization, management and control model suitable for preventing offenses of the kind that occurred. The model provides, in relation to the nature and size of the organization as well as the type of activity carried out, suitable measures to guarantee the performance of the activity in compliance with the law and to promptly discover and eliminate risk situations. The effective



implementation of the model requires a periodic verification and possible modification of the same when significant violations of the provisions are discovered or when changes occur in the organization or in the activity and a disciplinary system suitable for sanctioning non-compliance with the measures indicated in the model.

Therefore, both in the case of crimes committed by top management and subordinates, the adoption and effective implementation by the body of the organizational, management and control model is an essential condition, although not always sufficient, to avoid the so-called liability administrative office of the same entity.

### b. Anti-Corruption

Businesses should work against corruption in all its forms, including extortion and bribery. The application of the Ethic Code is a responsibility of each Subject. Once informed they cannot justify the lack of fulfillment as lack of awareness of the Ethic Code or have received different instructions from any hierarchical level or referent group. The standard GRI 205 deals with the issue of anti-corruption. The Group means practices such as abuse of office, kickbacks, fraud, extortion, collusion and money laundry; the offer or receipt of any gift, loan, commission, reward or other benefit such as encouragement to take action unlawful, unlawful or constituting the violation of a relationship of trust. Corruption can also include practices such as embezzlement, influence during acquisition, abuse of functions, undue enrichment, concealment, and obstacle to justice. Corruption is largely linked to negative impacts, such as poverty in transition economies, damage to the environment, violation of human rights, abuse democracy, incorrect allocation of investments, and undermining the rule of law. Organizations have to demonstrate according to the market, the rules and to stakeholders their adherence to principles of integrity, governance and practices responsible business.

We adopt anti-corruption guideline to evaluate and individuate eventually cases of fraudulent activities, as conflict of interests in commercial transactions. We manage these events prevent before it could born analyzing the risk a comparison with main offices in Headquarter of Turin and regulated by law 231/2001. If some issue arise the responsible manager which refer to office where the kickbacks, fraud, extortion, collusion or money laundry happens have to solving issue by legal actions about issue individuated with support of Supervisory Body if is our employee or whatever stakeholder involved. However we informed everyone about anti-corruption laws and which are respectively legal actions to do in fraudulent cases through contracts, law 231, communications and training (when is possible), where there are indicate which are rights and obligations to defending themselves and meeting with support of Supervisory Body or Human Resources Office. This is very important to prevent corruption



attitude and protect not only enterprise credibility and transparency but also each employee and stakeholder to know and avoid what to do in case to suffer involuntary in some of these situations.

Link to GRI standard 205 we purpose to observe the Corruption Perceived Index (CPI) of each country where we have plants and offices on site <https://www.transparency.org/en/cpi/2021>. This instrument offer a previous image where the risk of corruption could be higher in a country. The highest score value of CPI equals the lowest corruption perceived in the country. Below table reported index of country of our plants:

Country	Plant code	City	Corruption Perceptions Index
CHE		Morbio	84
DEU		Filderstadt	80
ITA	S000	ISC	56
	S002	Cambiano	
	S005	San Giustino	
	S006	Lacedonia	
	S007	Atessa	
	SA01	Monte San Vito	
	SA02	Comunanza	
POL	PL01	Skoczow	56
	PL02	Czechowice	
SRB	SR01	Kragujevac	38
MAR	MR01	Tanger	39
ESP	ES01	Calatayud	61
ROU	RM01	Cugir	45

*Table 3: National Corruption Perceptions Index where our plants placed*

The average CPI of the Group's countries is 57,2 matching of more plants sited on Italy that has similar value of 56. The highest risk of corruption of our activities could arise by Serbia and Morocco plants, where we can do more attention about the external transactions and activities to prevent issues.

### c. Global Ethic Code

Our Ethic Code is a rule book also included in "Organizational Format of SIGIT SPA" based on law 231/2001 and is applied to all stakeholder of the Group as members of the Board, Directors and Managers of entire SOAG EUROPE SA Group and its subsidiaries, all internal and external employees and suppliers that subscribed "General Condition of Delivery".

The alleged violations of the Code must be reported to SOAG Ethics Helpline that allows employees, suppliers, customers and other stakeholders to ask advices regarding the application of the Code and to make any reporting about alleged situations, events or actions that could be considered potential violations of our Code.



The reports will be evaluated to ensure the confidentiality of the identity, in accordance with current standards, if they do not have the obligation of transparency and knowledge of the reporting Subject.

The reports made in good faith will not lead to negative repercussions of the reporting Subject even if result unfounded. The reports cannot be anonymous and must be sent by mail to: [odv@SIGIT.it](mailto:odv@SIGIT.it)

Essential principle of the Group is the compliance with current laws and regulations in each country where we operate. The Group does not begin, and/ or evaluate the relationship, of whatever nature, with those who do not adopt and adhere to this principle. The violations cannot under any circumstances be justified by the implementation of the Group's interest or the achievement of an advantage for the same.

Anyone under pressure to contravene this principle is obliged to contact the SOAG Ethics Helpline.

Are expressly prohibited conduct, operations or activities regarding the possibility of the involvement of the Group in criminal association. Subjects are asked to refrain from engaging in or participate in the construction of pipelines such that, taken individually or collectively, could constitute a relevant behavior of any offenses, provided for by the legislation in force in the countries where it operates.

#### d. Transparency and fairness of Corporate information

The Company is committed to ensuring that every transaction is properly recorded, authorized, verifiable, legitimate, and it is possible to check the decision, authorization and performance process. All stakeholder must use with precision and correctness the information systems that the Group has developed over the years, and which guarantee the decision-making transparency.

For each operation, there must be an adequate supporting documentation available at any time to certify the characteristics and reasons of the operations and to identify who authorized, performed, recorded and verified the activity.

All stakeholder must ensure the reliability, transparency and completeness of the information, whether verbal or documentary (paper and digital), produced in the performance of activities, and they involved in the use and production of data contained in financial statements, reports and business presentation are required to maintain conduct based on principles of fairness, transparency, collaboration, and compliance with legal standards and regulations force, in order to provide true and correct information on the economic, equity and financial position of the Group and to ensure the availability of adequate supporting documentation for each transaction, so as to permit easy accounting recording.

#### e. Fairness of financial flows

Cash flows must be managed to ensure the full traceability of operations, retaining all documentation and within the limits of the responsibilities allocated to each Subject.



All payments and other money transfers in and out the Company and/or Group must be accurately and fully recorded in the Company's accounting systems and should be made and addressed to the subjects contractually formalized and/or approved by the Company and/or functional to achieve its object. Is strictly forbidden any operation which could involve the Company in activities of stolen goods, laundering and use of property or money of illegal origin.

**f. Prevention of conflicts of interest**

A conflict situation can arise when a Subject takes actions or has interests that may cause difficulties in doing his job respecting objectively and effectively the interest of the Group.

Subjects must avoid any possible conflict of interests (even potential) unreported and unregulated by law. In the case is not present a proper law for a possible situation of conflicts of interest, the Subject must communicate this situation to the Ethics helpline, which will assess the case and will provide the appropriate decisions communicating them to the Legal Representative of the Group, and in the case, are the Employees the Subjects of the conflict, also inform the Human Resources department.

**g. Human Rights**

The Group protects and promotes the supreme value of the human person who should not be discriminated based on age, gender, sexual orientation, race, language, nationality, political opinion or union affiliation, religious beliefs. The Group recognizes the centrality of Human Resources in the belief that the most important success factor for business, is guaranteed by the professional contribution of the people who work for it in a climate of fairness and mutual trust environment.

The Group recognizes such fundamental principles of its corporate philosophy, in line with the international organization to which it belongs, respect for work, professional contribution and commitment of each, respect for different opinions, regardless of seniority and experience, and the power of ideas. In this regard, the Group guarantees equal opportunities to all levels of the organization, the basis of merit and without any discrimination. Employees and associates is, by contrast, required to commit and act loyally ensuring the necessary performance and commitments to the Company. The Group also undertakes to ensure that authority is exercised fairly and correctly, avoiding any abuse.

The authorities must never become exercise of power harmful to the dignity and autonomy of employees and consultants in the broadest sense. The choices of work organization will safeguard the value of employees and contractors. The Group guarantees the physical and moral integrity of its employees and collaborators, working conditions that respect individual dignity and safe working environments and healthy. They are not in any way tolerate demands or threats aimed at inducing people to act against the law and the Ethics Code, or to engage in behavior and moral beliefs and personal preferences of



each. Aware also that professionalism is a value that is acquired through practice and experience and specific training, the Group recognizes the significant contribution that this process receives from professionals with greater seniority and promotes the transfer of their knowledge and their professional attitude to younger staff. The Group pursues the enhancement of professionalism.

The Group does not tolerate any discriminatory conduct, or any form of harassment and / or personal or sexual offense. The Group is committed, therefore, to provide a work environment that excludes any form of discrimination and harassment related to race, sex, religion, nationality, age, sexual orientation, disability or other characteristics personal non-work related.

In the workplace it is strictly prohibited any illegal conduct or any form of abuse, threat or aggression to people or assets. The staff is required to report about behavior of this nature and, in any case, any alleged violation of the standards, guidelines or procedures.

In view of the core business, the Group Companies provide working conditions that respect individual dignity and ensure workplaces are safe and healthy, in observance of safety regulations and health and hygiene in the work force, firmly. They promote the spread of a culture of safety and awareness of the risks associated with their job activities, requiring all, at all levels, responsible and respectful behavior of the security system set up and all the company procedures that form an integral part. In this context, each employee, The Group is committed to:

- to engage in safe assets to protect the health of employees of the Group companies and the communities surrounding its locations, bringing consistency to its operational strategies to comply with company policy on safety, health and environment;
- to ensure the training and information of all those who carry out their work in offices and factories belonging to the Group, on the risks related to security which they find themselves from time to time exposed, giving them, the means and Protection Devices individual required by law in relation to the type of activity;
- to periodically review and continuously monitor the performance and efficiency of its system in place of the risks connected to safety, to maintain safe workplaces to protect the integrity of its staff, and to achieve the objectives of continuous improvement set in safety, health and environment.

#### h. Environment

The Group attaches great importance to environmental protection and sustainable development of the territory in which it operates, in consideration of the rights of the community and future generations.



The Group is committed, and requires a similar commitment from the company he leads, to consider, in the context of operational management and business initiatives, environmental needs, and to minimize the negative impact that its business activities they have on the environment.

The Group is committed to implement all establishments towards achieving the environmental certification according to ISO 14001.

To this end, the Group, in full compliance with current environmental legislation, pay close attention to the following aspects:

- promotion of activities and processes as much as possible compatible with the environment, using criteria and advanced technologies in the field of environmental protection, energy efficiency and sustainable use of resources;
- assessment of environmental impacts of all activities and processes;
- collaboration with stakeholders, internal (eg. employees) and external (eg. institutions), to optimize the management of environmental problems;
- pursuit of environmental protection standards through the implementation of adequate management and monitoring systems

**i. Protection of privacy**

The Company guarantees the confidentiality of the information in its possession and refrains from communicating relevant data, unless it is expressly authorized and compliance with applicable legal standards. Recipients are prohibited from using confidential information for purposes not related to the exercise of its business.

The Company guarantees, in accordance with the law, the confidentiality of personal data and information and establish appropriate procedures to ensure, among other things, treatment, internal management and external disclosure of such information. Personal data are treated with appropriate tools for the time strictly necessary to achieve the purposes for which they were collected. Specific security measures have been taken to prevent the loss of data.

**j. Gifts, presents and other forms of benefits**

In the business relationship with third barred from receiving or offering benefits (direct and indirect), gifts, acts of courtesy and hospitality, which are of a nature and value that can be interpreted as aimed at obtaining favorable treatment but no in line with normal business courtesy.

And 'it required of any person who receives gifts exceeding the ordinary relations of courtesy, notify your manager Referrer and to score this situation directly to the ethics helpline.



### k. Intellectual property

The Group in its development, production and sale of its products, using names and / or trademarks and / or trademarks, exclusive property and / or the use of which in the Group's availability through a legitimate title to use.

In addition, using only ideations or elaboration of which has unique properties also by the fees and / or refunds agreed with third parties by means of contractual documents, and which third parties authorize their use. SOAG provides corporate customers its expertise and professionalism in the belief that a synergistic and coordinated approach towards consumer expectations, ensuring benefits for both parties. Moreover, in dealing with customers, the Company, in commercial activities, with reference to the negotiations, the conclusion of contracts and the obligations of the same, ensures the utmost diligence, fairness and transparency. It is also committed to providing timely, truthful and accurate also to develop customer relations of cooperation to ensure product quality for the end consumer.

### I. Providers

The Company is committed to developing cooperative relationships with providers based on a communication to enable the exchange of expertise and information and to promote the creation of public value. The choice of suppliers and the purchase of goods and services of any kind are made solely based on objective assessments focused on competitiveness, quality parameters, reliability, price and ability to provide effective nursing care.

Relationships with Suppliers will also be marked by the highest principles of fairness, integrity, impartiality and independence. To ensure the integrity and independence in supply relationships, the Company imprint at maximum transparency and efficiency in the purchases process, by:

- adopting of forms suitable to adequately document the decisions taken;
- storing of information and the official offer documents or related to the selection, and contractual documents for the periods established by current legislation and referred to in internal purchases procedures.

The Company undertakes not to establish relations of any nature with persons who use, or you suspect they avail themselves, the work of minors or staff recruited irregularly or who operate in violation of the laws and regulations required to protect the rights of workers. Even in the relationship with suppliers, the Company reiterates the absolute prohibition to engage in any behavior or act that may be linked to crimes related criminal association.

In addition, the Company will enter into contracts with suppliers and external collaborators with the obligation to comply with the principles of the Code, indicating that sanctions against any violations



termination of the contract and / or claim damages under and for the purposes of art. 1456 of the Civil Code.

### m. Public administration

All activities and reports conducted in the name and / or on behalf of the Company and / or Group with public authorities must be based on the utmost honesty and transparency so as to ensure and protect the image and reputation of the Company. Relations with the Public Administration shall be managed only by the subjects expressly delegated. More specifically:

- is not allowed to offer money or gifts to managers, officers or employees of the Public Administration or their relatives, whether Italian or from other countries, except in the case of gifts or items of little value, however that is not paid to the same topic more a couple of times a year, presumably regarding holidays or special events;
- They are considered acts of corruption and illicit payments made directly by the Company or their employees and illicit payments made through persons acting on behalf of the Company in Italy and abroad;
- it is forbidden to offer or accept any object, service, benefit or favor in order to obtain more favorable treatment in relation to any dealings with the Public Administration;
- when during any requests or relations with the public administration, personnel must not attempt to improperly influence the decisions of the party, including those of officials acting or making decisions on behalf of the Public Administration;
- if the Company uses a "third party" to be represented and / or operate in relations with the Public Administration, such person shall comply with the instructions provided for in this Code;
- the Company will not be represented in relations with the Public Administration, as a consultant or other "third party" when you can create conflicts of interest;

In the case of loans received from national or international governments recognized for the Company's operations or aimed at specific activities or projects, these contributions will be used solely for the purpose for which they were intended by the lender, in accordance with current legislation.

As part of the management of concessions with Public Authorities, SOAG ensures fairness and clarity in the negotiations and in the contractual constraints.

The Company also provides the highest under the agreement with public authorities, but report the business with transparency, accuracy and timeliness. We assesses carefully the appropriateness and feasibility of performance required by the Licensors bodies, particularly regarding regulatory, technical



and economic conditions; in the case in which the company, as a result of the above analysis, feedback anomalies in the advanced requests is required to promptly notify Ente applicant.

**n. Public supervisory authorities and supervisory bodies**

Communications, reports and responses to requests sent to the public supervisory authorities or the control bodies shall be prepared in accordance with the principles of completeness, integrity, objectivity and transparency. During testing or inspection, the Recipients must adopt an attitude of maximum availability and cooperation. Strictly forbidden to obstruct consciously and in any form of public authority functions of supervision or control bodies. And 'also it is forbidden to show them the facts that are untrue or conceal facts that need to be communicated to them.

To prevent conflicts of interest and ensure maximum transparency in the conduct of inspections, relations with public authorities and supervisory bodies should be handled only by the corporate functions expressly delegated.

**o. Managing relationships with the media**

The Company assumes the commitment to establish relationships of full cooperation with all the media, without discrimination, respect for their reciprocal roles and business confidentiality requirements, to meet their information needs.

Relations with the media must be managed exclusively by the legal representatives or persons from time to time deputies and expressly authorized. Recipients may not disclose information to the press without authorization of the Company and / or Group. And absolutely forbidden to disseminate false information. In any communication with the outside, the information concerning the Company and its activities must be truthful, clear, verifiable, respect the principles mentioned above with regard to relations with public institutions and be defined in order to protect the image of society.

**p. Protection and proper use of company assets**

The directors, officers and employees must protect the Company's assets and ensure their efficient use. All Company assets should be used only for legitimate business purposes and not for activities outside the Company. The directors, executives and employees are expected to act with due diligence to protect corporate assets by acting responsibly and in line with the operating procedures to regulate their use. Administrators, managers and employees must be used with care resources entrusted to them or in which they have the responsibility, exclusively for the achievement of the objectives of the Company, avoiding improper use which may be harmful or in conflict with the interests of 'company or applicable regulations.



Theft, carelessness and waste can adversely affect the Company's profitability. The directors, managers and employees must take the necessary measures to prevent theft, damage or misuse. Any suspicion of accident or theft must be reported immediately. The e-mail users should use this tool only for work purposes, with content that is consistent with the principles and values expressed in this Code. This is because each message or information transmitted through electronic network is a statement attributable to the Company. With reference to the use of internet / intranet, apply the principles set statute. In particular, it is recommended:

- limit its use only to the job requirements;
- prioritize sites that can be considered "safe" from the point of computer and ethical views, to preserve the integrity of business systems and the company's image.

It is also forbidden to install on their computers unauthorized programs that could potentially be carriers of "virus". If for some reason you suspect the presence of virus in your PC must immediately do this to the function.





# 9. HUMAN RIGHTS



## RIGHTS

SOAG's businesses support and respect the protection of internationally proclaimed human rights, to make sure that they are not complicit in human rights abuses. Human rights are relevant to the economic, social

and environmental aspects of corporate activity. For example, labor rights requiring companies to pay fair wages affect the economic aspect. Human rights such as the right to non-discrimination are relevant to the social aspect. And the environmental aspects of

corporate activity might affect a range of human rights, such as the right to clean drinking water. So, while the primary responsibility for the enforcement of international human rights standards lies with national governments, there is a growing acceptance that corporations also have an important role to play.

Corporations impacts have increased over recent decades as the economic might and political influence of corporations has grown, and as corporations have become more involved in delivering services previously provided by governments. SOAG coordinates its activities in compliance with governments policies linking ours goals with the 17 SDGs of UNFCCC about Agenda 2030.

Corporations have come to recognize that part of being a good corporate citizen includes respecting the human rights of those who come into contact with the corporation through direct and indirect contracts. Corporations are also responding to the fact that many consumers and investors expect corporations to act in a socially responsible manner.

Over the past decade, the international community has made significant advances in examining and clarifying the links between corporations and human rights. A wide variety of voluntary initiatives have been developed by individual companies, industry bodies, NGOs, inter-governmental bodies and multi-stakeholder groups. We're proposing initiatives following voluntary international guidelines drawing up the codes of conduct, monitoring and reporting procedures, and socially responsible reporting KPIs aligned to Standards GRI.



Under such initiatives, hundreds of corporations worldwide have publicly committed to uphold specific human rights standards. This illustrates the growing acceptance of the need for corporations to simultaneously protect the interests of their shareholders, employees, customers and the community in which they operate. Our businesses uphold the freedom of association and the effective recognition of the right to collective bargaining;

- the elimination of all forms of forced and compulsory labor;
- the effective abolition of child labor;
- the elimination of discrimination in respect of employment and occupation.

#### **a. Working conditions**

The meaning of working conditions and work environments have a significant impact on employee productivity and on the eventual success of a business. While conditions often vary by industry, and on the resources of the employer, successful smart business owners pay attention to and understand the conditions under which they expect their workers to perform.

Working conditions are the context within which a worker is expected to perform his job. The physical conditions of the workplace and physical demands of the job, that include things like lighting, the size of the space in which a worker must perform her job, exposure to potential toxins, allergens, nuclear or biological hazards, and what kind of physical strain. About working risks we prepare a risk assessment where each plant manager evaluates the level of each kind of risks as report in Health and Safety section on table 7. Following the risks assessment we annually do an internal audit to assign a score about Health and Safety conditions also based on frequency and gravity of accidents happened.

Interpersonal relationships exist in all jobs that required some type of contact with others, but the nature and frequency of this contact varies from job to job. Work conditions in our group may include working with customers and suppliers, calls by telephone or meeting in-person, working with a wide different people, regular public speaking, answering phones or responding to email.

Structural job features are defined by job performance expectations, such as job scheduling, the consequences of making a mistake, latitude of independent decision making, and whether the job is largely unstructured or requires a lot of repetitious tasks.

#### **b. Diversity and inclusion**

The SOAG EUROPE SA Group manage and keep diversity and inclusion through own activities and governance based on Ethics Code, with the visions to improve it to generate new relations given added value at each person involved. Human rights are often taken for granted, as they legally refer to the



sources of law shared at European level and therefore present in labor contracts approved by trade unions. The article in the contracts defend not only the employees as worker in own daily activities but also as person that have subjective features as sex, origins, culture, religion and nationality. Diversity of the people has to protect and manage in a business to allow major inclusion and integrity of the ethic.

First of all our Group hugs multitude of different cultures without prejudices because of ours 1.741 employees working on in a different nations totally foreign one to each other without exclude the relations and communication between them. The work do it together through the exchange of opinions between colleagues allow to aligned business goals and cultural inclusion.

The main risk could be to don't take anyone action to prevent diversity and inclusion issues, for this reason the Group working constantly to improve it elaborating a more detailed policy and ethic code to share it with each other stakeholders like suppliers and customers to aligned the common necessary ethic. The next aim could be to certificate it through SA 8000 or ISO 26000.

We set the strategy meeting with stakeholders to identify diversity and inclusion goals and ensure they are aligned with larger company goals and national laws and norms. To agree and develop priority initiatives to promote diversity and inclusion based on SOAG EUROPE SA Group activities and country of operation we will move on:

- Preventing discrimination and harassment during hiring and promotion;
- Promoting diversity, equality and inclusion.

These initiatives will be implemented for both the hiring process and the ongoing working environment, such as:

- An effective grievance mechanism;
- A remediation procedure for grievances;
- Regular reporting on diversity, inclusion and any related grievances.

The **legal compliance** statements about work conditions and environment, including the physical demands of jobs, can be useful in defending against discrimination or disability workplace lawsuits. The national laws are clear that discrimination of a protected category is not allowed, but it depending on the kind of job an applicant's inability could be the bona fide requirement to not hire him. The company is sensible about this themes, indeed in headquarter in Turin there's a small cooperative association that manages the bar in the establishment named "Innovation Cafè and Bistrot" giving the opportunity to work at social issues or caregiver guys.



The company also pursues the reduction of the gender and age gap, in compliance with 5 and 10 SDGs, in its own ethic code but primarily as human value in a society done by people, where when the people work together in a solidarity activity reaches better the common goals as a multinational business company has to do. Without any discrimination in the recruitment phases, he group choose our employees and collaborators basing on the experience or/ and the added value that him/ her could give in the vacancy needed, and this is could be better explained by our data in compliance with GRI standards 401 and 405. The first offers guideline to report gender employees statistics while the second is based on age gaps:

	<i>nr</i>	<i>%</i>
<b>Female workers</b>	<b>883</b>	<b>50,7%</b>
<i>of which manager</i>	20	1,1%
<i>of which white collar</i>	129	7,4%
<i>of which blue collar</i>	734	42,2%
<b>Male workers</b>	<b>858</b>	<b>49,3%</b>
<i>of which manager</i>	76	4,4%
<i>of which white collar</i>	139	8,0%
<i>of which blue collar</i>	643	36,9%
<b>Total</b>	<b>1741</b>	<b>100%</b>

Table 4: SOAG EUROPE SA Group's gender statistic in 2021

	<i>nr</i>	<i>%</i>
<b>Total nr of manager</b>	<b>96</b>	<b>5,5%</b>
<i>of which &lt;30 years old</i>	4	0,2%
<i>of which 30 ≤ age ≤ 50 years old</i>	64	3,7%
<i>of which &gt;50 years old</i>	28	1,6%
<b>Total nr of white collar</b>	<b>260</b>	<b>14,9%</b>
<i>of which &lt;30 years old</i>	46	2,6%
<i>of which 30 ≤ age ≤ 50 years old</i>	154	8,8%
<i>of which &gt;50 years old</i>	60	3,4%
<b>Total nr of blue collar</b>	<b>1385</b>	<b>79,6%</b>
<i>of which &lt;30 years old</i>	277	15,9%
<i>of which 30 ≤ age ≤ 50 years old</i>	824	47,3%
<i>of which &gt;50 years old</i>	284	16,3%
<b>Total</b>	<b>1741</b>	<b>100%</b>

Table 5: SOAG EUROPE SA Group's age statistic in 2021

In the Group vision keep fundamental avoiding discriminatory language both making a good hire and protecting a company against possible legal issues, it is also important to accurately describe the work environment that might reflect discriminatory hiring practices. Running all job listings by a company or third-party employment law attorney can help prevent potential legal issues from cropping up as a result of a poorly-phrased, or distributed, job ad.



### c. Child labor

We believe that the future is in the childhood. Their growth is fundamental that hold calm and quite. We defend them to protect our future to take action pursuing risks, reducing emissions and improving health and safety of involved people near our activities. We not having any child under 18 years old into our workforce.

We follow the directive 94/33 of European Commission about the protection of young people at work applicable to any person under 18 years of age having an employment contract or an employment relationship defined by the law in force in the plant's countries. As directive defines child shall mean any young person of less than 15 years old or under compulsory school in national law. We list the minimum age to work under pre-determined national restrictions and the unlimited age to work in the countries of our establishments:

CHILD LABOR				
Country	Plant code	City	Minimum age to work	Unrestricted
CHE		Morbio	13	18
DEU		Filderstadt	14	18
	S000	ISC		
	S002	Cambiano		
	S005	San Giustino		
ITA	S006	Lacedonia	15	18
	S007	Atessa		
	SA01	Monte San Vito		
	SA02	Comunanza		
POL	PL01	Skoczow	15	18
	PL02	Czechowice		
SRB	SR01	Kragujevac	16	16
MAR	MR01	Tanger	16	19
ESP	ES01	Calatayud	16	18
ROU	RM01	Cugir	15	18

Table 6: National ranges of legal age for child labor where our plants placed

Our company adopt the national measures necessary to prohibit work by children;

- children of at least 15 years of age who work as part of a combined work / training program or an internal work experience program, provided that such work is carried out for the purpose of performance in cultural, artistic, sporting or advertising activities , must be subject to prior authorization from the parents;
- cannot be harmful to the safety, health or development of children and are not such as to harm their attendance at school, their participation in guidance or vocational training programs approved by the competent authority or their ability to benefit from I instruction received;



- the employer takes the necessary measures to protect the safety and health of young people, taking particular account of the specific risks associated with their work;
- the work ban ensures that young people are affected by specific risks to their safety, health and development or that they are a consequence of their lack of experience, lack of awareness of existing or potential risks and the protection of their safety and health is ensured by the fact that the work is carried out under the supervision of a competent person;
- work for the children only if foreseen by a combined work / training plan or by a work path in the factory;
- time devoted to training by a young person working within a combined theoretical and / or practical work / training program or internal work experience program is counted as working time.

However our group has not anyone children obviously, and our human resource get data about the youngest employees hired of the company:

- 20 years old an external worker by agency
- 24 years old an internal worker hired.

As expressed in the Code of Ethics and in the Social Responsibility Policy, SOAG Group undertakes to prevent and combat all situations of possible exploitation of work. To guarantee respect for human rights, checks on possible impacts of human rights are carried out on the activities carried out in the company as required by the Social Responsibility Policy.

The Group also specifies in its hiring policies the minimum age requirements for employees in line with national provisions for all companies and in the case of interviews with minors under the age of 18, a specific procedure has been set up to ascertain the conditions of education of the minor. so that the work commitment is not incompatible with the national protection requirements and verification and control on compliance with the conditions adopted when signing the contract. The verification of risks inherent in non-compliance with human rights, child labor and forced and compulsory labor is carried out periodically as part of the updating process. The provisions contained in the Group Code of Ethics are further strengthened by the "General Conditions of Delivery" with Suppliers, in which the Group requires compliance with national laws, other applicable laws and the principles stipulated in the International Labor Organization Conventions, in the Universal Declaration of Human Rights and in the OECD Guidelines for Multinational Enterprises.



#### d. Labor conditions and compliance issues

The employee contracts of the SOAG EUROPE SA Group include national and local government laws where we have establishments on working conditions of which:

- **Health and safety standards:** national law requires employers to provide a safe working environment and to provide workers with protection against hazards, such as PPE.
- **Job training:** the company provides all its employees with the general and specific training on health and safety, as well as any job learning courses or technical specifications and all the necessary and expected updates for managers and employees.
- **Workplace rules:** generally our employees work 8 hours per day with breaks. The blue collars work on weekly rotating shifts while white collars work regularly on 8.00 to 17.00. Where is possible, mainly for office job, there's one day per week of smart working. Holidays and illness follow regulars contract standard based on national laws.
- **Enforcement of workplace contracts:** the employer provide workers with specific accommodations and work conditions in case of job travel and the reason of the short or long transfer.

Work conditions can have a significant impact on morale and productivity. The company found to improve and maintain the best job environment with regular control of hygiene and safety in plants to protect the well-being of employees, reducing the chances of workplace injuries along with resulting financial liabilities and the need to take time off.

#### e. Recruitment

When searching for new talent, our Human Resources usually provide information about working conditions in job ads and notices. Third-party recruiters often have this information as well and present it to candidates. Accurately describing a work environment in job listings serves two main functions:

**Self-selection:** providing details about a company's work environment and contract conditions helps job searchers determine whether this is a job worth applying to.

In agree with the common implementation plan we report some data of SOAG's employees:

- 124.621 hours of overtime for about 24 €/hour per employee paid by company as total cost (it includes contributes and fees) in 2021;
- 1.044 employees involved in 111.354 hours of training, of which 106.774 for general and technical and 4.580 for Health and Safety.



## f. Community

The Group contributes to economic welfare and growth of the communities where it operates. To this end, the Group conforms, in carrying out its activities in compliance with local and national communities, fostering dialogue with trade associations or other.

Since 2020, the year of the Covid-19 Pandemic, SOAG Group has decided to formally engage in many internal and external initiatives to bring the company to increase its ESG values.

### i. PUDENS ONLUS

We offer our contribute to ONLUS foundation named PUDENS a moral entity (<https://www.pudens.it/>). It does not seek to enhance an affiliated brand or the name of a specific family or connoted initiatives. In this respect it is very secular and open, open source, computer scientists would say.

PUDENS pursues in via exclusive civic, solidarity and social utility purposes, in particular through the service in favor of people in need, disadvantaged, marginalized, in conditions of loneliness and social hardship and the spread of culture of hospitality, integration and volunteering. The Foundation was created to stimulate development and the support of the culture of inclusion and social cohesion in order to support people in need e disadvantaged, in the context of preservation and respect for the world and nature.

If human is the being that we all and the well-being of human himself is also our well-being, what PUDENS wants to achieve is the well-being of human. Since many men have the ability to manage this goal on their own or have the opportunity to achieve this goal with effort and commitment, some do not have all of this. We want to take care of those who have such and so many difficulties that they cannot even remotely aspire to a sustainable life. This is our concept of inclusion. Inclusion that goes from material help to the most disadvantaged, but taking into account that we must also help those who need something so as not to end up in a state of discomfort. A small example is helping the soup kitchens with meals in collaboration with Caritas Torino and at the same time as setting up scholarships to improve training opportunities for young people.

### ii. IDT

IDT is a company that aims to study and implement automation in the industrial process based on Open-Source technology and able to enhance and push the ideas of young makers. It is a company with a specific Mission: "We think differently, outside the box". The average age of the IDT is under 26 with young people aged 20 to 30. This is our real strength: the new vision that this generation combines with the experience of those who know industrial processes. This has allowed us to develop industrial automations that have been installed in the production flow: assemblies, ultrasonic robotic welders,



robotized gluing, all using control systems industrialized by IDT starting from the Arduino and Raspberry platforms. Starting from the first customer who believed in the possibility of introducing these technologies in their production process, the customers have always increased and, albeit with some initial perplexity, more and more customers are approaching these technologies, mainly in the Automotive Production Line. The transformation of products from maker material to industrial devices took place mainly thanks to the electronic skills that have grown within us and to the software development skills that have developed to the point that we feel the need to create a division by development lines internally, product to which distinct brands have been dedicated: the first for the embedded part and the second for the Integrated Automation systems. The third division arises from the need to take automation outside of industry and serve the social sector.

### iii. ISC LAB

ISC Lab Scarl (Benefit Company) is a consortium between companies and organizations (public or private) born in 2020 to create a network between the business world and research institutions to include, incubate and accelerate innovative startups or SMEs willing to share their dreams and ambitions. All this takes place in an ecosystem that includes, hosts and guides the human, entrepreneurial and technological development of the new initiative.

ISC Lab has two main pillars:

- Materials research and analysis laboratory with particular attention to plastics and rubber.
- Incubator and business accelerator.

In this community, our goal is to offer Turin creativity a place where it can express itself and the President of SOAG explains in episode 28 of Bench-Mark how SIGIT SpA, IDT Solution, Fondazione Pudens and ISC Lab, four very different realities coexist and collaborate by choosing to join Turin Social impact:





# 10.HEALT &



# SAFETY

SOAG EUROPE SA Group is in compliance with health and safety rules, in the countries in which it operates, and pays the utmost attention to the workers safety. The preventive activity dedicated to organize the work processes, to ensure the use of machines and plants are technologically safe and comply with standards. Modernization of workstations targeted to the improvement and satisfaction of the ergonomic conditions. Reduction or substitution of raw materials free of hazardous substances, in compliance with the policies, the European Standards and the rules established by the production value chain (supplier-customer). Health of employees through targeted and continuous health monitoring activities, designed to prevent the onset of disease and illness by ensuring a reasonable workload and psycho-physical commitment that are daily provided by our employees.

The staff is regularly involved in specific health and safety training activities in order to safeguard their own and others' safety during the course of daily work activities. The company undertakes periodic audits to monitor the adherence to health and safety measures in the sites, with aim of continuous improvement of safety indexes. Workplace safety is one of the main goals here in SOAG EUROPE SA Group, a goal to strongly commit to avoid any accident or injury at work.

## a. Risk assessment

To identify risks we assign to each plant the related level (low, moderate, significant and high level) about each kind of risk. The risks and levels are about the same for each plant, because all have similar activities. Main differences there are in ISC, which it is the headquarter of the Group so there isn't productivity activities but only office works mainly. In the others plants there are manufacture and productivity processes: those include primarily plastic molding and correlated activities and machineries as reported in "plants and activities" section on Table 1. The excluded plants that have this type of processes are Cambiano S002, that instead it produce rubber components so it has rubber molding



activities, and Comunanza SA02 with aluminum molding processes while Tanger MR01 has both plastic and rubber molding.

Based on these activities and processes we associated a level for each kind of risk required to put in safe workers and prevent job injuries. In the table below we report levels of risk to each current risk into our plants:

SOAG	Type of risk	Applicability													
		ISC	S002	S005	S006	S007	SA01	SA02	ES01	MR01	RM01	PL01	PL02	SR01	
		Risk Level	Risk Level	Risk Level	Risk Level	Risk Level	Risk Level	Risk Level	Risk Level	Risk Level	Risk Level	Risk Level	Risk Level	Risk Level	
Mechanical	Crushing	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	
	Shearing		Low	Low											
	Cutting and sectioning	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low		Low	
	Puncture perforation	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low		Low	
	Entanglement and dragging		Low	Low											
	Impact/ run over	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Significant	Low	
	Trolleys overturning	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	
	Abrasion creep	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	
	Material projection														
	Slipping falls	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	
Physical	Falls from above		Low	Moderate	Low										
	Noise		Low	Moderate	Low										
	Vibrations	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Moderate	Low	
	Hand/arm system												Moderate	Low	
	Microclimate		Low	Low											
	Non-ionizing radiation												Low		
	Electromagnetic fields												Low		
	Artificial optical radiation												Moderate		
	Chemical	Contact with chemical agents (inhalation, ingestion, contact)	Low	Moderate	Moderate	Moderate									
		Mutagenic carcinogens												Low	
Asbestos															
Electric	Direct contact														
	Indirect contact	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	
	Proximity to high voltage elements												Low		
	Electrostatic phenomena														
	Thermal radiation												Low		
Thermal	Burns and scalds												Low		
	Climatic changes												Moderate		
	Contact with hot surfaces	Low	Low										Low		
Fire/ explosion	Contact flames	Low		Low	Low										
	Fire	Low	Moderate	Low	Moderate										
Biological	Explosive atmospheres	Low											Low		
	Exposure to agents (sopre, viruses, bacteria)	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Moderate	Low	
Ergonomic	Manual handling of loads	Low	Moderate	Moderate											
	Push pull		Low	Significant	Low										
	Repetitive movements		Moderate	Low	Moderate										
	Exposure to screen display	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	
Psychosocial	Shift work		Moderate	Low	Moderate										
	Night work		Moderate		Moderate										
	Bullying and harassment												Significant		
	Lack of motivation												Low		
Others	Poor leadership												Moderate		
	Material fall from above	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	
	Interference with other companies / workers	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	
	Accumulation of materials		Low		Low										

Table 7: Risk assessment in SOAG Europe's plants



## b. Risk profiling

We control hazards and risks of Health and Safety considering each plant and materials used in that plant as showed in previous table. Considering this we monitor plant's activities doing annual internal audit in place to assign final score (0-100) about results obtained of safety level. We re-evaluate this score on number of accidents happened in one year, also about gravity and frequency indexes:

Plant	N. Accidents	Yearly work hours	Internal Audit Score	Gravity Index Score	Frequency Index score	Final SCORE
S002	1	59.182	96,0	0,034	16,90	79,1
S005	0	44.065	98,0	0,000	0,00	99,0
S006	0	63.420	98,0	0,000	0,00	98,0
S007	0	106.880	97,0	0,000	0,00	97,0
SR01	0	292.979	98,0	0,000	0,00	98,0
MR01	0	134.229	94,0	0,000	0,00	97,0
PL01	3	265.447	94,0	0,032	11,30	100,0
PL02	0	207.074	90,0	0,000	0,00	97,1
ES01	0	170.220	96,0	0,000	0,00	96,0
SA01	2	198.372	95,0	0,059	10,08	96,2
SA02	1	43.669	96,0	0,158	22,90	77,5
RM01	0	457.217	97,0	0,000	0,00	97,0
<b>TOT</b>	<b>7</b>	<b>2.042.754</b>	<b>95,8</b>	<b>0,024</b>	<b>5,10</b>	<b>94,3</b>

Table 8: Internal safety audit score for each plant in 2021

We observe that in 2021 number of accidents are been 7 with a low gravity index, intended as lost days for injuries related to worked hours. Frequency index values are number of injuries on lost days for injuries. In the follow graph is reported the trend of frequency and severity injury along last years:

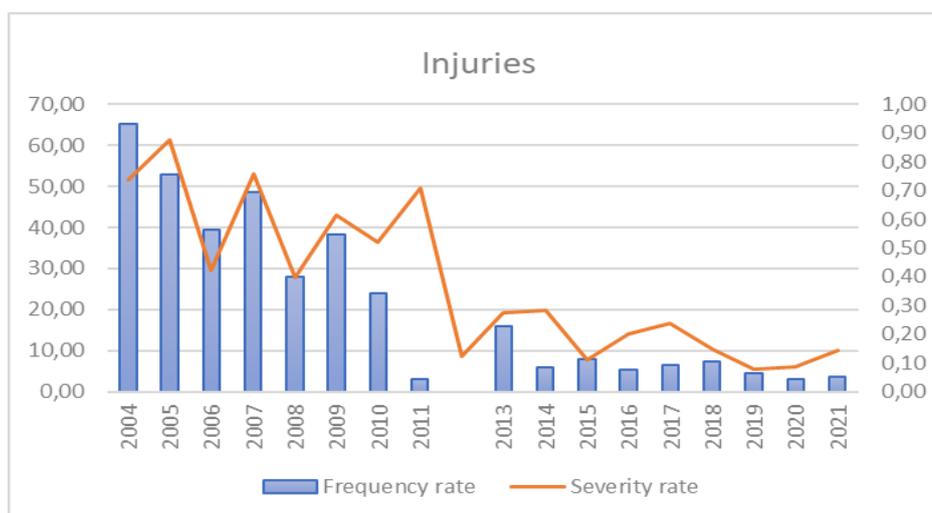


Figure 5: Trends of frequency and severity injuries



We can observe that the indexes are decreasing caused by a respective reduction of number of yearly injuries. This is a good signal to improvement in safety and prevention of risks on work.

Below we report yearly incidence rate (number of annual injuries related to internal employees) on 100 employees compared to the annual amount of employees:

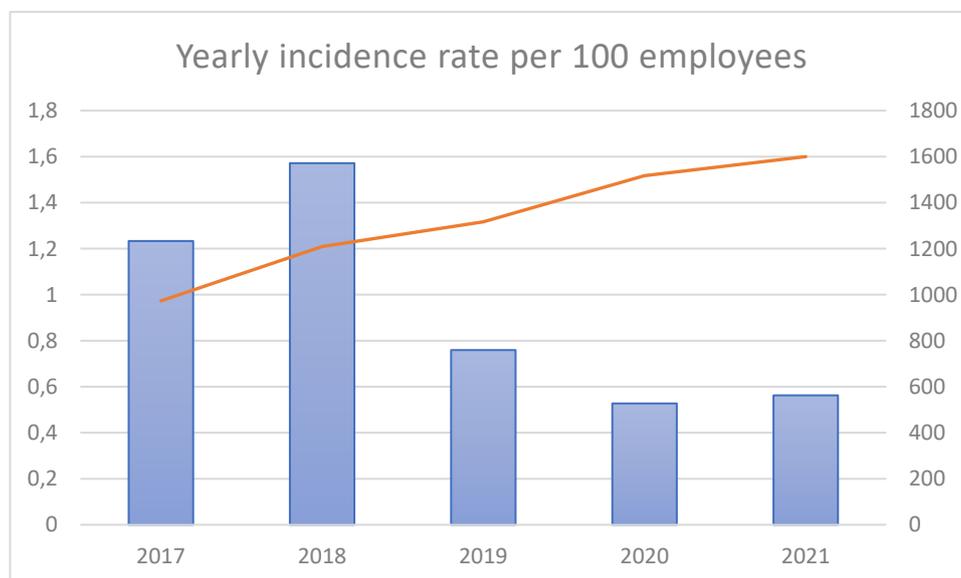
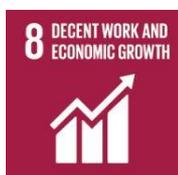


Figure 6: Incidence rate on 100 employees compared to total employees

The graph shows that the trend is in fallen since 2018, with a corresponding increase of total number employees (punctual on 31.12 of each year).



# 11.QUALITY



The management of SOAG EUROPE SA Group is committed to a policy that has as its reference both its internal and external customers, and respect for the environment.

In particular, internal customer satisfaction is achieved through checks and management of questionnaires relating to the services / products offered. Indeed, all production facilities and R&D centers are compliant with ISO 9001 quality standards and the new IATF 16949:2016 quality standard. At the same time, the "SIGIT Academy Team" ensures the further development of the management system with respect to a global standardization of processes and systems in all SOAG's plants. is really concerned with the worldwide and local environment and for this, all the plants are upgrading compliant to the **ISO 14001**, the internationally agreed standard that sets out the requirements for the environmental management system. Specific spot checks are carried out concerning maintenance and checking of all the plants' installations in order to reduce as much as possible step by step the environmental impact.

The satisfaction of the external customer is pursued by offering and adapting all processes to their implicit and explicit needs, in particular by improving and monitoring the know-how of both their own processes and customer specifications and the achievement of the objectives agreed upon at the time of signing the contract.

The customer plays a central role in SOAG's success. It therefore becomes important to know the customer's modus operandi, to provide services / products that meet their needs and to create a high level of customer satisfaction and obtain a zero defect level of supplies.

SOAG's objectives are:

- Improvement of **image** and reputation on the market and therefore;
- Increase in the number of **customers**, growth in revenues, territorial expansion of the Company and entry into new market areas;
- **Satisfaction of stakeholders** (shareholders, customers, users, employees, suppliers) and therefore;



- **achievement of budget objectives**, increase in employment level, higher salaries, reduced absenteeism and none (or reduced);

conflict with employees, constant reduction in the number of complaints, high level of customer satisfaction, partnership agreements with suppliers:

- **compliance** with explicit and implicit contractual commitments both by SOAG and its suppliers through a review of the General Supply Conditions;
- Attention to communication with the customer;
- Customer service;
- The **research**, through the 'due diligence', only of suppliers who do not directly use (or who do not make use of sub-suppliers) the so-called Conflict Minerals (metals from the Democratic Republic of the Congo or neighboring areas), based on this that the Dodd-Frank Wall Street Reform and the Consumer Protection Act of 2010 require. The aim is to achieve a conflict-free supply chain.

The achievement of these first six objectives will be constantly monitored by detecting customer satisfaction and analyzing complaints.

- The adoption of the most modern customer support techniques;
- comply with current environmental legislation and increase the number of ISO 14001 certified plants;

SOAG EUROPE SA also promotes and undertakes to:

- Define the resources, structures and responsibilities that confirm the intention to implement the continuous improvement of the company management system inspired by the ISO 19001, IATF 16949 and ISO14001;



- Define, control and pursue the objectives aimed at the continuous improvement of products and processes and their impact on the environment;
- Take any action aimed at minimizing any negative impact of its activities on the environment and preventing any type of environmental pollution;
- Implement any improvement actions aimed at rationalization, compatible with maintaining production needs, energy consumption and the use of natural resources;



- Implement any improvement action with the aim of rationalizing energy consumption and the use of natural resources, while maintaining its production conditions. Extend the energy saving project for plants with the use of renewable energy. After the Cambiano, Atessa and Kragujevac plants, the project launched in 2011 was extended to the Chivasso plant with the elimination of asbestos and the installation of an 800 kW photovoltaic system. Furthermore, starting from November 2014, the photovoltaic system installed for the plant in Morocco is operational;
- Define and implement projects aimed at seeking alternative solutions in the field of materials and raw materials for a reduction in consumption and an increase in the use of recycled material, while maintaining the technical / quality standards of the products;
- Inform its customers about the possible environmental impact deriving from the use of the products manufactured;
- Conduct a professional growth of its collaborators, aimed at increasing knowledge and sensitivity towards the environment and its protection;
- Continuous updating and dissemination of the Integrated Policy and its principles, within its own organization and its suppliers;
- Develop new plants and new markets abroad, using the experience gained from WCM. SOAG EUROPE SA is aware of its role and duties towards future generations and wants to actively participate in the overall improvement of the environment and the conservation of natural resources, certain that such a result can only be achieved with the active commitment of all.

### **Compliance with workplace safety regulations**

The achievement and maintenance of these last three objectives will be constantly pursued through the training and information of personnel at all levels.

By achieving these goals, we intend to build a company, which is firmly focused on its customers, to increase market presence and make customer satisfaction the differentiating factor with competitors in a highly competitive market. The specific objectives will be defined annually by the Management and communicated to all employees.



# 12. ENVIRONMENT



Today is fundamental necessary to follow the path outlined by governments and authorities against the climate change. The environment concerns multidisciplinary themes into an enterprise so SOAG Group purposes to face all the efforts to ensure high environment and social quality to future generations. First we began to calculate our



impacts in terms of CO2 equivalent emissions through measure of Carbon Footprint of Organization based on **LCA** studies. After we can set reduction goals aligned with science based solutions and to follows

the business reducing costs and improve product quality with sustainable innovations. Not only, but we have the opportunity to optimize entire activities and movements of our materials sold semifinished products by lower costs that often is traduced in saving emissions.

The first sustainable change was to move our Headquarter in Turin (Italy) on 2020 because is located in a Near Zero Energy Building (**NZEB**), a highly energy efficient building regulated by the European Directive 2010/31/EU, which requires a low energy supply. In addition to being characterized by very low utilities costs, it offers employees high comfort at low costs and above all with almost zero environmental impact.



## a. Energy

Amount of SOAG EUROPE SA Group energy is based on Standard **GRI 302** that explain the guidelines to obtain the quantitative of energy consumption. This standard subdivided first in all internal energy consumption (302-1), and the second all external energy consumption (302-2). This scheme is linked



to the Standard GRI 305 that require to calculate Scope 1, 2 and 3 of emissions generate by direct and indirect energy consumed, respectively for Scope 1 and 2, while Scope 3 that concerns all the others indirect activities along value chain of the company. So standard GRI 302-1 about energy is linked to GRI 305-1 and 305-2 to calculation of emissions generate from energy consumption in plant, while GRI 302-2 is linked to GRI 305-3 about energy and consequently emissions generated from company's upstream and downstream activities.

We have calculated only the part one of GRI 302 because, though we have done for Scope 3 emissions, we should break up results obtained to return in quantity of energy, but it is very difficult and it could cause issues in amount of real energy consumed because each categories upstream and downstream has different logical evaluation into formula used.

However with GRI 302-1 we can report the amount of energy burned for heating and consumed for electricity in the Group's plants, not only but the standard lets to highlight the different kind of the production of electricity supplied based on national energy mix. First of all the heating consumption for entire group in 2021 is 1.079.548 m<sup>3</sup> of natural gas, that's equal to 42.534 GJ. Electricity consumption depends on the local-based plant, so we have to join each plant's consumption with own national energy mix. The total group's electricity consumption is 39.231.624 kWh in 2021, the graph below shows production's sources for each plant:

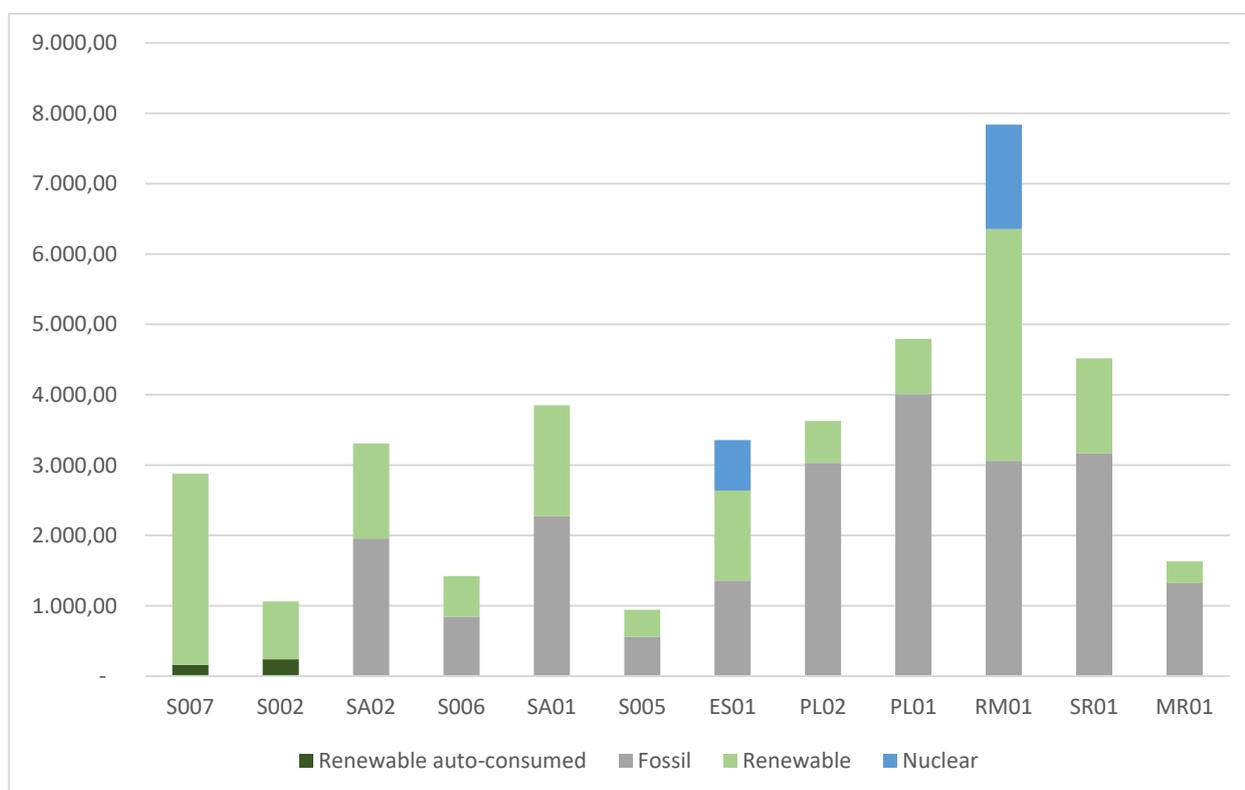


Figure 7: Electricity consumption by SOAG EUROPE SA Group's plants based on national energy mix sources in 2021 [MWh]



## b. Carbon Footprint of Organization

The company has already taken steps to report its Scope 1 and 2 starting from 2019, also by joining platforms such as Carbon Disclosure Program (CDP) and ECOVADIS, which make it possible to declare, monitor and verify the environmental impacts by recognized certification bodies. In line with the intentions of improving the environmental performance of the organization, the SOAG EUROPE SA group expanded the analysis of its Scope 3 in 2021.



SOAG EUROPE SA group is committed to reporting on its Carbon Footprint. An estimate was made in according to the guidelines of the Greenhouse Gases Protocol, a technical guide offered by the collaboration between the World Resources Institute (WRI) and the **World Business Council for Sustainable development** (WBC) and therefore internationally recognized to be able to estimate the greenhouse gases generated directly and indirectly by company's annual activities.

The GHG Protocol envisages reporting its emissions as follows:

- **Scope 1:** direct emissions generated by the consumption of fossil fuels such as boilers and owned vehicles.
- **Scope 2:** indirect emissions generated by the consumption of electricity.
- **Scope 3:** other indirect emissions generated by upstream and downstream activities along the company's value chain.

It's been primary to associate appropriate emission factor to each categories based on the kind of unit of measure to transform in mt of CO<sub>2</sub>e:

- Consumption-based for energy (fossil and renewable)
- Distance-based method and fuel consumption for transports and travels
- Cradle-to-gate for materials purchased
- Gate-to-grave for waste and end-of-life treatments
- EEIO for investments

Amount of our energy consumption, or rather Scope 1+2 together, generated 16,80 mt of CO<sub>2</sub>e in 2021. Beyond NZEB headquarter that auto-sustain its consumptions, we installed photovoltaic panels on Atessa and Cambiano plants producing an yearly amount of 787.438 kWh that contribute to 399.961 kWh in auto-consumption of electricity while the residual is sold to the grid and it can be considered as



avoided emissions equal to 584,68 t of CO<sub>2</sub>e subtracted by amount of Scope 2 emissions generated from electricity consumption.

Table below shows the Scope 1, 2 and 3 reporting:

Categories		Amount of mt CO <sub>2</sub> e [1mt = 1000 t]
Scope 1	Direct emissions	2,03
Scope 2	Indirect emissions	14,77
Scope 3	Purchases	56,42
	Capital goods	7,21
	Energy not included into Scope 1 e 2	2,26
	Upstream	
	Transport upstream	1,13
	Waste	- 3,53
	Business travels	6,75
	Commuting of employees	0,26
	Downstream	
	Leasing upstream	-
Transport downstream	22,87	
Processing of sold products	2,15	
Use of sold products	-	
End of life of sold products	2,75	
Leasing downstream	-	
Franchising	-	
Investments	1,75	

**Table 9: Scope 1, 2 and 3 of 2021 in mt of CO<sub>2</sub>**

Analyzing Scope 3 categories we can attribute the main emissions of our activities from purchases upstream and transports downstream categories. This confirms that it's very relevant to contribute to monitoring the whole supply-chain, because these emissions are out of our control:

- Purchases impact considers raw materials extraction and following processes to get materials that we acquire to the gate of our suppliers;
- Transports impact considers the distances among each customers from shipment's plant and fuel consumption of truck used based on distances as for transports upstream.

Purchases could be optimized researching to substitute actual raw materials with other more sustainable as re-used or recycled, but we have also wait suppliers innovation and translation in process. Instead transports category is much higher than upstream own because there are many more deliveries than incoming materials; here we could reduce emissions monitoring deliveries to customers and optimize them reducing travels into one delivery if is geographically and quantitatively possible.



The deliveries of SOAG EUROPE SA Group concerns b2b committed to produce plastic components for automotive and Small Domestic Appliance sectors. In 2021 we purchased 17.918,46 t, mainly kinds of plastic, and sold 16.249,86 t, divided by 86% plastic, 12% rubber and 2% aluminum.

### c. Trend and target emissions

We set an emissions reduction target of Scope 1 and 2, and we propose us a commitment to reduce Scope 3 emissions too by 2026 in compliance with the +1.5° C goal proposed in Paris COP21. We set a target calculated by Science Based Target's tool that indicate us a reduction of -30% of emissions by 2026 as compared to 2019 emissions level.

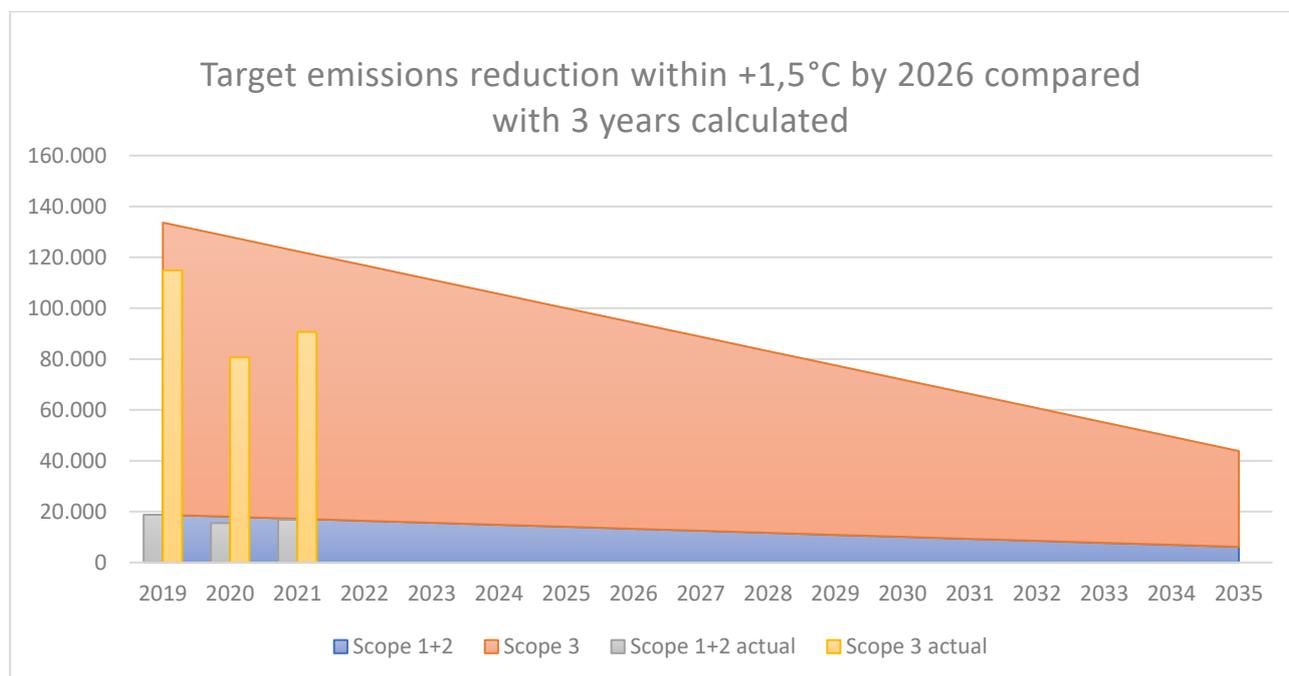


Figure 8: Target emissions reduction within +1,5°C by 2026 compared with 3 years calculated

The trends show that we already have a reduction beyond the simulation purpose by Science Based Target's tool in Scope 1+2 emissions, but not constantly decreasing during these 3 years that it shows a flexion in 2020, probably about Covid-19 restriction related to less energy consumption, trade and travels. We have to consider that it was added a new plant in our company in 2020 (Czechowice PL02) that it increase volume of business activities too. To take an action and commitment with +1,5° international goal, we set an ambitious reduction of -45% by 2026 of Scope 1+2 emissions, and to follow -30% path reduction of Scope 3 emissions.

### d. Intensity

The intensity of emissions is measured by the quantity of Scope 1 and 2 emissions related to annual revenues. The decrease in Scope 1 and 2 emissions calculated over the last 3 years shows a growing



in the reduction trend respectively with an increase in annual revenues from € 143.2 million in 2019 to € 177.1 million in 2021, following the new plant in Poland which has generated added value in our activities. As for the absolute emissions of Scope 1+2 we have set a greater commitment towards a reduction of -45% by 2026. As the graph below shows, we are already reducing and we are almost near our target in emissions intensity, so we'll looking for holding and improving this trend:

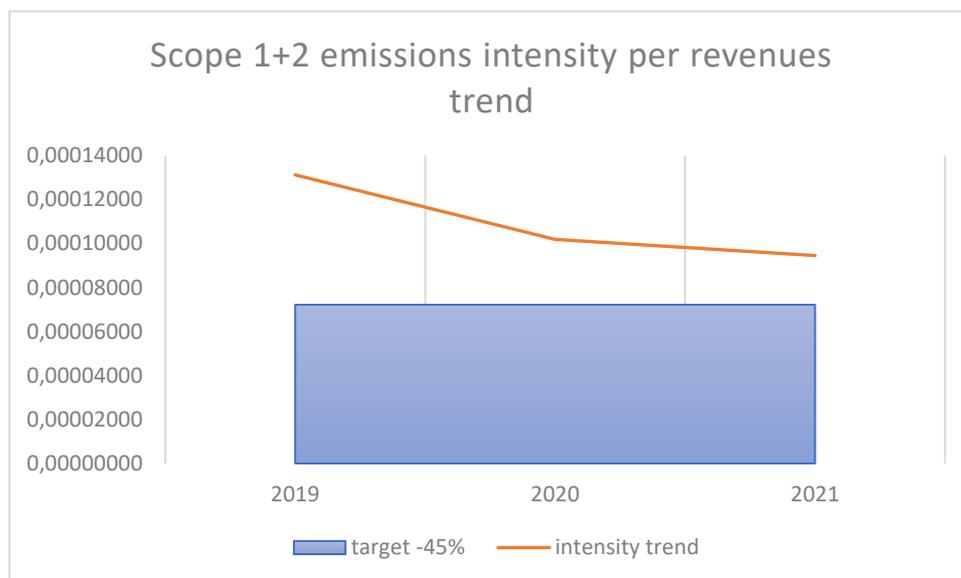


Figure 9: Scope 1+2 emissions intensity per revenues trend

#### e. Waste

In 2021 total waste generated by the SOAG EUROPE SA Group is 4.166 t of which 54% is allocated to recycling by third-parties and other 15.000 kg of plastic is re-used in internal processes.

The rest of waste is allocated to landfill of which 1.431 t not hazardous and 495 t hazardous. Indeed all the materials are subdivided into CER cods, in the way to assigned recycling or landfill destination of waste, even Tangeri plant despite being outside Europe (Morocco), and except Kragujevac plant in Serbia which aggregated data only for hazardous (25 t) and not (201 t).

In 2021 the results show a negative impact in terms of t CO<sub>2</sub>e (-3.531) because we applied net emission factors of a scientific study titled "Greenhouse gas emission factors for recycling of source segregated waste materials - David A. Turner, Ian D. Williams, Simon Kemp - 2015" that it considered the CO<sub>2</sub>e avoided for primary production of the recycled materials like plastic, metals and packaging.

So we consider that our waste generated more than covered environment impact of waste to landfill own, because the almost half of them are not recycled but the net negative results show how much we avoided to reproduce raw material.



The chart below shows allocation of waste for each plant in 2021:

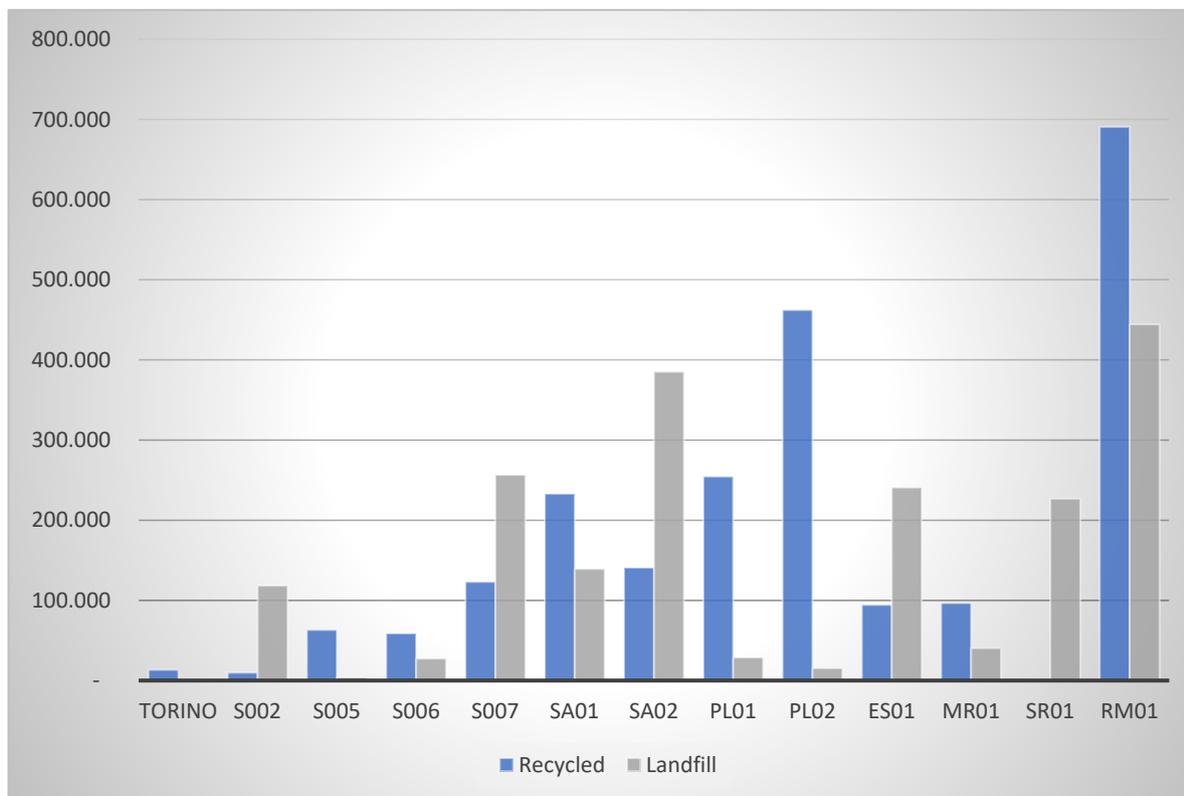


Figure 10: Waste allocated to recycling or landfill for each plant in 2021 [kg]

The plant that generates more waste is Cugir (RM01), but it offset the landfill disposal with almost twice waste to recycling. While plants of Cambiano and Comunanza are those to take more attention in future allocation of waste because they have much more landfill disposal respect to recycling, whom they produce respectively rubber and aluminum components. Rubber is difficult to recycle, while though aluminum is recycled, this plant needs much emulsions and quantitative solutions to its processes, that are not discharged into water pipes but delivered to third parties that deal with waste disposal, as for all other waste materials.



# 13. WATER



Globally SOAG EUROPE SA Group used less than 0,025 MI per day for each employee (except closed piping) and an average of 2,4 MI per day by the plant. The higher hydro indexes risk are in areas where our plants haven't a large withdrawal of freshwater. Our consumption is near to zero

because discharged whole withdrawals of water and **6.500 MI are re-used** every year by internal closed pipes.

However, our water uses are not linked with our business, for this reason we don't expect business impact or risks linked to water because not substantial used in our processes.

Higher yearly withdrawals are used by the Monte San Vito plant (9.178 MI) and it used 40% of its water by internal closed pipes to cool machinery, but an evaluation can be extended to manage and anticipate eventual issues.

Freshwater withdrawal is totally discharged because we use it only to cool presses machinery (also with closed piping) and for employees' consumption or similar. We withdraw 74% of the total water used in one year by freshwater from third parties such as municipal water suppliers, public or private utilities, and 6% by groundwater. We use **20% of water in the process from our internal closed piping**. The water quality is not monitored because we haven't chemicals or similar processes that release pollution substances in water discharges, then our plants haven't obligatorily to monitor it.

The direct use across all ours operations shows the proportion of the following water aspects are measured and monitored:

- Amount water withdrawal is 26.727 m<sup>3</sup>:
  - o 92% from third parties provided by municipal water suppliers, public or private utilities;
  - o 8% from groundwater;
- Water re-used in internal closed piping is 6.496 m<sup>3</sup>, the 20% of the whole used water;
- Water consumption = Total water withdrawal - Total water discharge = 0.

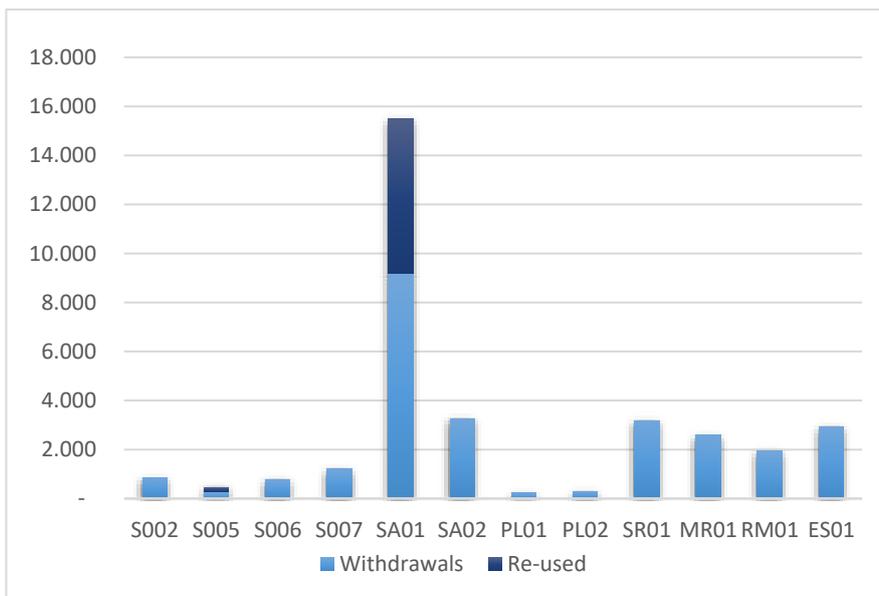
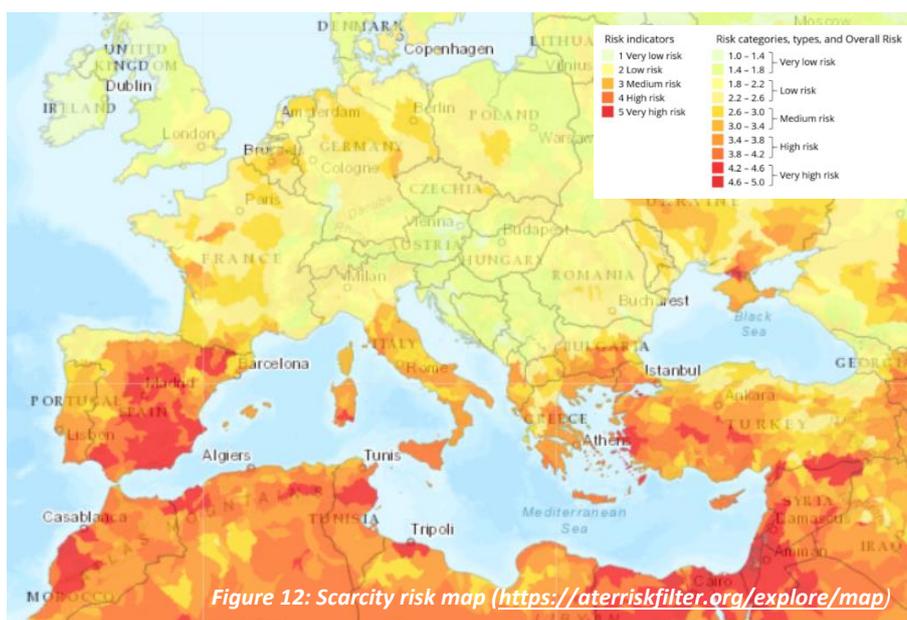


Figure 11: The use of water in 2021 [m3]

Fresh surface water, including rainwater, water from wetlands, rivers, and lakes is not relevant for our company, because we withdraw freshwater only by third party or groundwater, and brackish surface water or seawater is irrelevant too. Instead it is relevant amount of renewable groundwater withdraws (2,172 m3) though it correspond only to 6,5% of the whole used water. Our higher withdraws come from third party sources: we withdrew 24.555 MI in 2021 (74% of total withdraws), corresponding to a decreasing by 3.146 MI from last year.

### a. Water scarcity risk

Based on the **WWF Water Risk Filter**, water scarcity refers to the physical abundance or lack of freshwater resources, which significantly impact business such as production/supply chain disruption, higher operating costs, and growth constraints. Water is generally calculated as a function of the volume of water use/demand relative to the volume of water available in a given area. The water scarcity is a comprehensive and robust metric as it integrates aridity index, water depletion, baseline water stress, blue





water scarcity, available water remaining, drought frequency probability, and projected change in drought occurrence.

We assigned scarcity index risk to each plant based on the areas where they located and the average shows a value of 2,68 for the whole group SOAG. Consider that there are only 2 plants (Tangeri and Calatayud) in high and very high areas risk while all the others are at very low and low risk.

		Risk range	Average values
CHE	Morbio	2,2-2,6	2,4
DEU	Filderstadt	1,4-1,8	1,6
	Cambiano	2,2-2,6	2,4
	San Giustino	2,6-3,0	2,8
ITA	Lacedonia	3,4-3,8	3,6
	Atessa	2,6-3,0	2,8
	Monte San Vito	2,6-3,0	2,8
	Comunanza	2,6-3,0	2,8
POL	Skoczow	1,8-2,2	2
	Czechovice	1,8-2,2	2
SRB	Kragujevac	1,4-1,8	1,6
MAR	Tanger	3,8-4,2	4
ESP	Calatayud	4,2-4,6	4,4
ROU	Cugir	2,2-2,6	2,4
<b>Total Average</b>			<b>2,685714</b>

*Table 13: Hydro stress index in area where plants placed*

We haven't set targets or goals yet, on the other hand we haven't a wide use of water in our processes, but we could adapt future plan management to monitor and control water uses and quality to prevent scarcity withdrawal by each plant compared to geographical hydro stress. Eventually if there will be some issue we can consider set and managing water related strategies, opportunities and risk evaluation not only for our business, although we have an insignificant consumption and it isn't substantial into the processes, but also to forecasting water necessity on the surrounding areas where we operate.



# 14. SUPPLY CHAIN



## a. Management of product quality



SOAG Group is committed to ensuring adequate levels of quality of products respecting quality standards required and expected by the client. The Group's control activities are aimed to ensure the quality throughout the production chain, sales and after-sales service.

Innovation of the production process, promoted continuously by the Group, is accompanied by the constant product control and compliance in the technical specification ISO 9001 : 2008 for all processes and ISO/TS 16949:2009 and subsequent IATF 16949:2016 specifications the automotive sector, thus ensuring the highest quality of product and system.

The Company constantly update, inform and support the human resources dedicated to the production process for the management of product quality and system.

The Group also has defined a process to periodically verify the quality of the product and / or service in addition to the management and monitoring of complaints is considered by the Company as an opportunity for performance improvement and alignment with the wishes of the client.

## b. Principles of conduct in relations with third parties

The Group is particularly attentive to develop a relationship of trust with all its possible interlocutors, ie individuals, groups or institutions whose contribution is required to pursue its mission, as well as with employees, customers, suppliers, partners business, public institutions, market, political organizations, trade unions and social, whose interests may be directly or indirectly affected by the activities of the Group.

SOAG requests the adoption and sharing of sustainable practices among business partners, suppliers and dealers. The third-party assessment of suppliers based on CSR criteria encourages suppliers to pay attention within their supply chain. Detailed scores in those external CSR assessments allow suppliers to launch action plans to improve their labor and purchases practices and reduce their environmental impact. As a response to the climate change challenge.



SOAG's suppliers are invited to join forces in those global approaches and required to disclose to the Company their raw material suppliers. This allows them to challenge their own supply chains to ensure a better risk coverage. The Company's responsible purchases approach is useful in making its suppliers part of a positive trend.

### c. Clients

The Company intends to define customer or consumer anyone who purchases finished products company on the basis of commercially defined agreements. The satisfaction of customers is the main objective of the Company. The quality of the raw material and its processing and final product of the process is ensured through ISO / TS 16949 certified system: IATF 2009 and 16949

### d. The selection of suppliers

SOAG focuses on maximum reliability and quality of its work. Responsible and sustainable management is therefore firmly anchored to the company's values and policy which also includes the approach to the supply chain. Operating at an international level, the Group interfaces with national and international companies and groups, which is why the selection of suppliers and the correct management of the relationship with them is a fundamental issue. This is an opportunity to generate value along the automotive and DA value chain. The Group's purchases are almost entirely made in Italy and the offices of purchase following the recommendations of compliance with local legislation and to choose for the use of substances with less impact on the environment and suitable for recycling as an indicator of environmental policy.

Fundamental tools in the relationship with suppliers are our Code of Ethics, renewed in 2020 and the Supplier Code. In order to enhance and monitor the responsibility of the supply chain, we have implemented an initial selection procedure and a periodic evaluation in which in addition to the criteria of quality, service and competitiveness, specific parameters of social and environmental responsibility of suppliers are monitored.

Responsibilities ensure a compliance with the requirements of social responsibility for direct workers e of its supply chain. Respect for points relating to suppliers is secured by doing sign a commitment to respect them principles, with the sending and subsequent evaluation of a questionnaire and the verification of acceptance of the Supplier Code approved by President and CEO of SOAG Group. The company develops:

- communicate effectively the requirements of the standard to the managers of the supplier companies, contractors or private agencies for employment and sub suppliers.



- Assess the significant risks of Non Compliance by supplier companies, contractors or private agencies for employment and sub-suppliers.
- Develop reasonable efforts to insure that the significant risks are adequately faced by suppliers, contractors or by private employment agencies and by sub suppliers and that the consequent actions are addressed according to appropriate priorities.
- Establish monitoring and monitoring activities tracking of company performance suppliers, contractors or agencies private for use and sub-suppliers in order to ensure that their significant risks are dealt with effectively.

To ensure the above, the Group follows the specific procedures, for the choice suppliers' initial as well as theirs periodic assessment of compliance.

We individuated distances of each suppliers by each our plant receive materials purchases , to monitor transport impacts and optimizing logistic movements in costs as well as in environment impacts. In 2021 we subdivided short and long distances by each supplier in 3 measures:

- Suppliers km < 100
- Suppliers 100 < km < 500
- Suppliers km > 500

Respectively based on distances above our suppliers are 71, 152 and 484 for a total of 707. So we have more of our suppliers come from beyond 500 km. We suggest to improve and optimize our incoming materials thought impact contribute of transport upstream is relatively one of the lower than all categories of Scope 3 analysis. In the other hand we have to consider that it could have lower impact in costs and environment purchases materials from far supplier than nearest because that kind of raw material could be more sustainable than that of near supplier.

#### **e. General conditions of purchase**

Orders sent by the company are always understood to be supplemented by the General Conditions of Purchase. where orders provide for special purchase conditions, the latter shall prevail over provisions specified in the General Conditions of Purchase.

Before confirming the order, the supplier must provide the company with information and advice in relation to the order and in general regarding the correct wording of the latter, obviously with reference to good technique and rules of trade, of which the supplier must in any case always act as guarantor towards the company according to a general principle of good faith and cooperation in the phases of contractual negotiations and in the execution of the delivery contract.



The supplier's order confirmation must be sent to the company within five days from the date of receipt of the order, together with the order signed by the supplier for acceptance, also with references to the documents mentioned therein.

Following the sending of the order confirmation, the **supplier has the obligation to:**

- Excluding as provided subsequently, fully comply with the terms and conditions indicated in the order with particular reference to delivery times, technical specifications, conformity, quality and performance of the products and in the mathematics sent by the company;
- ensure compliance with legal requirements, including ISO, DIN and CE standards for electrical, mechanical, hydraulic and pneumatic safety;
- ensure that each supply will comply with the EC and EU rules in force and with the legislation applicable from time to time in the field of environmental safety and workers' safety by extending this obligation to the handling operations of the products supplied;
- to ensure the custody of certifications required by the laws in force relating to its quality, safety and environmental system and to keep such certifications for the entire duration of the contractual relationship;
- deliver the technical documentation (including, where necessary, certification documentation) relating to the products and/ or services provided to the company.
- provide the company with an annual self-declaration, through the completion of a specific questionnaire, in which it certifies that all materials and mixtures forming part of the products supplied to the company (and therefore of its entire supply chain) comply with the regulations known as "conflict minerals";
- deliver and use products, items, materials and mixtures that are free of the substances listed in EU regulation 1907/ 06;
- for materials and mixtures, deliver the safety data sheet updated according to EU regulations (REACH, CLP, etc);
- in case of delivery of finished products, maintain a stock of products available at its plants in the quantity and with regard to the materials determined by the company in order to guarantee supply.

The supplier undertakes to keep the company relieved and unharmed for any prejudicial consequence deriving from and/ or connected with the violation of the obligations referred to in this article by the supplier itself.

The supplier also undertakes to accept and execute any request for technical modification of the order made in writing by the company, unless its acceptance does not involve changes to the performance,



conformity and/ or quality of the product and/ or final service. In such a case, the supplier shall immediately and without delay notify the company and if it fails to give such notice and in any case proceeds to execute the order as technically modified, it shall also be responsible for the product and/ or the service provided if it does not finally comply with the performance, conformity, specifications and quality required by the company in the order and in the documents attached to it and/ or referred to therein.

#### f. Transport

The supplier undertakes to carry out the transport of the products in full compliance with the provisions of the law, in particular the customs regulations in force, it being understood that the risks and shipping and packaging costs are borne by the supplier until the time of delivery of the products to the places indicated by the company, unless otherwise specified in writing by the company itself.

Any costs of transport, packaging, customs fees, taxes, duties, charges and rights that affect the order remain the responsibility of the supplier unless otherwise stated in the order itself.

The supplier bears the risk for the loss/ damage of the products, even for reasons not due to itself, until the time of delivery of the product to the place indicated by the company in the order.

All products must be properly packaged, marked and shipped in a workmanlike manner according to the best scenario each time applicable. Each unit of packaging must be identified by a label.

The supplier shall be liable for any expenses incurred by the company as a result of insufficient packaging and/ or damage from the place of shipment to the place of destination.

#### g. Delivery

The supplier undertakes to deliver the products or perform the services in accordance with the terms indicated in the order or in the documentation attached to it. The delivery terms indicated in the order are binding for the supplier and are to be considered mandatory and essential for the correct execution of each order and it must take place at the place of destination indicated by the company.

The supplier guarantees that the quantity of products delivered corresponds to the quantity defined in the order and in the documentation attached to it and/ or recalled. Otherwise, the company may, alternatively, at its choice:

- accept the quantities actually delivered and reduce or increase proportionately the quantity of following deliveries;
- place at the supplier's risk and expense the quantity of products supplied in excess of that provided for in the purchase order;



- request the supplier to immediately send the missing quantities of products, charging the costs, charges and damages resulting from the supplier's breach of contract;
- refuse to receive the products and request that the supplier collect the products at its own expense and risk without prejudice to any further remedy and compensation;
- reduce the price proportionately.

The final acceptance of the delivery takes place "on sight" without this entailing the execution of particular analyses (chemical and/ or physical) on the delivery, which is not a mere sample check as a result of which, on the basis of ordinary diligence, only obvious and visible defects of the delivery can be ascertained.

The final acceptance does not, however, release the supplier from its responsibilities under the terms of the law with regard to the non-conformity and hidden defects of the products. As far as molds are concerned, notwithstanding what was previously provided for and regulated, the final acceptance process is carried out in compliance with the specification "molds delivery and delivery terms" (so-called "approval of molds") applicable from time to time, without prejudice to the safeguards of the law. Unless otherwise specified in the specific mold sheet and/ or in the order, the supplier guarantees within the terms of the law:

- the full compliance of the products supplied with the technical specifications and performance requirements agreed with the company and contained in the order and in the relative documents attached and/ or referred to, as well as that they comply with the specific purpose for which they are intended; as to the molds, the guarantee is granted in relation to all the parts of which they are composed;
- that the delivery complies with the laws, regulations and other provisions applicable in the country of destination;
- the absence of non-conformities and defects of any kind, hidden or not, in the products and their correct and proper functioning.

When the products supplied are molds, the supplier's warranty includes, without additional charge to the company:

- all extraordinary maintenance operations on the product, without time limits, up to a number of strokes equal to 3 times the expected annual volume;
- breakdowns due to structural failure, irregular wear and/ or malfunctions which affect the quality of the printed product, process efficiency, operational safety and production continuity.

In the event that during the warranty period the company detects the existence of defects, non-conformities and/ or discrepancies of the products, it shall notify the supplier in writing within 60 days



from the discovery and shall have the right, at its sole discretion, to request, alternatively and, in any case, without prejudice to the right to compensation for damages:

- the removal of the defects/ non-conformities found or the replacement of the non-conforming products or the replacement of the entire batch of products of which the non-conforming products are part, at the supplier's expense;
- in such a case, the supplier, at his own expense, shall have the obligation to take all the necessary steps in order to promptly repair and/ or replace the products that are not working properly and/ or are affected by defects and/ or non-conformities within the term indicated by the company and in any case as soon as possible in order to reduce or avoid damages;
- the reduction of the price of the non-conforming products or of the batch of which they are part and the compensation with any damages or costs suffered by the company, without prejudice to the supplier's liability for any claim for compensation brought by the company on a residual basis;
- termination for breach of contract by refusing to pay for non-conforming products and requesting the refund of any amounts already paid for.

Where the supplier does not provide for the request to eliminate the defects detected by the company, the latter will have the right to provide directly or through third parties, at the expense and damage of the supplier, without prejudice to the compensation of any costs incurred in this regard and/ or any damage suffered.

Without prejudice to the possibility of elimination of defects by the company provided for in this article, the supplier hereby guarantees in any case that the repaired and/ or replaced products will, in turn, be covered by a new warranty period (as provided by law) starting from the date of the replacement or repair.

Any non-conforming or defective deliveries shall be collected by the supplier within a time period fixed by the company, failing which they will be scrapped and/ or returned to the supplier, in both cases at the supplier's expense.

The supplier also guarantees the availability of spare parts for the entire life of the delivery and its final application. In case of repairs under warranty, activities must take place at the place of use of the delivery and costs and expenses must be borne by the supplier.

#### **h. Invoicing**

The prices indicated on the company's order are fixed and final and include the costs of packaging, tuning, wrapping and transport to the place of delivery, unless otherwise stated in the order itself.



Invoices, issued in duplicate within the terms indicated in the order and in the relative technical and delivery specification, must include, in addition to the legal requirements, the order number and shall reach the company no later than the fifth day after their issue.

Payments will be made in accordance with the provisions of the order and the relative technical specification attached to and/ or recalled by the order. Any delay in payment by the company may never constitute a reason to suspend or cancel any present or future order.

#### **i. Supplier's liability**

The supplier is exclusively liable for any damage caused to the company and/ or to third parties (including the final customer) for violation of the rules of law or malpractice/ negligence and for any damage, cost and/ or liability arising from and/ or connected with the delivery of the products and for any alleged defects and/ or non-conformity of the products with the order and the technical documents attached to it, without prejudice to the right of the company to proceed with the compensation of any sum due.

The supplier is also solely responsible for any injury or damage caused by its personnel to employees as well as to third parties and/ or things of third parties in general, meaning therefore the company indemnified and relieved of all liability in this regard.

In any case, the supplier undertakes to keep the company relieved and unharmed for any and all claims for compensation of any nature whatsoever, made by any person against the company and deriving from and/ or connected with the products supplied or in any case with the delivery relationship established.

The supplier undertakes, in any event, to communicate promptly - and in any case no later than five working days after the event - any third party claim that may have been made against it for any reason. Should third parties bring legal actions against the company, the supplier shall be bound to bear all the costs and any consequent prejudice, including any expenses incurred for the defense in court. In such case, the company shall promptly inform the supplier in writing of such judicial initiatives.

The supplier undertakes to reimburse the company for any charges and expenses it may incur as compensation for damages caused to third parties by the supplier and not reimbursed by the latter, authorizing the company from now on to withhold the amount of expenses incurred from the sums due to the supplier for any reason.

It is agreed, however, that in the event of breach of the obligations referred to in this article, the company shall be entitled to terminate the order immediately.

The supplier shall not be liable for non-compliance with its duties under the order if it can prove that such non-compliance is due to an event of force majeure, meaning an event of force majeure:

- which is beyond the control of the supplier who suffers it;



- which, at the time of signing the specific orders, was not reasonably foreseeable, as well as its effects, by the supplier and;
- which was not otherwise avoidable and/ or remediable by the supplier.

In the event of an event of force majeure that determines the impossibility or even the mere risk of delay of the delivery, the supplier shall inform the company in writing within 24 hours of the occurrence of the event and provide all the information necessary in this regard and in particular the measures taken to remedy the delay. During the occurrence of the event of force majeure, the company may obtain the products from another supplier.

In case the event of force majeure persists for more than 8 days, the company will be entitled to declare the order terminated pursuant to art. 1456 of the Italian civil code by simple written notice to the supplier and without any compensation for any damage being due to the latter.

#### **j. Market standards**

The supplier undertakes to keep its product competitive in terms of price, technology and quality compared to market standards during the period of the delivery. If after a reasonable period of time, the company considers that the product is not competitive in relation to the market, it shall inform the supplier of that. The company and the supplier will implement a cost reduction program to allow the supplier to bring the price to market standard.

If this goal cannot be achieved, the company reserves the right to withdraw from the existing delivery relationship with a notice of at least 30 days without any indemnity and/ or compensation for damage being due to the supplier.

#### **k. Confidentiality**

The supplier undertakes to treat with the utmost discretion and confidentiality and undertakes not to disclose to third parties any information (including, but not limited to, industrial property rights, specifications, methodologies, equipment, databases, technical product specifications, documents, processes, projections, evaluations and data, drawings, models, samples, know-how, software, technologies, industrial secrets and inventions, prototypes and tools of all kinds, as well as all other information, experience and knowledge developed within the company, of which it will become aware during negotiations, execution of the order and company visits, including information relating to the composition of products, installations, the means of production and other corporate assets as well as the organization of production and the company, the services provided by the company, commercial initiatives and customers, the management and performance of the company, relations with third parties and so on) relating to the company and/ or other companies that are third parties to the delivery



relationship (and, in particular, to the companies that are part of the SOAG group and the final customer) that has been acquired by the supplier for the execution of the order ("confidential information") and to use it exclusively for the execution of the order, taking all necessary measures to ensure that this commitment is observed, with particular reference to its personnel and any subcontractors authorized. This commitment applies to all confidential information, but in particular to technical specifications, formulas, drawings, designs and economic conditions relating to the order, whether tangible or intangible.

This confidentiality commitment will remain in effect during the contractual relationship period, as well as for a period of 5 years after the contractual relationship with the company has terminated. At the end of the contractual relationship, the supplier undertakes to return immediately to the company, at its request, all documents relating to the delivery.

Violation of this article shall entitle the company to terminate the order in progress to the detriment of the supplier pursuant to art. 1456 of the Italian civil code.

#### **I. Intellectual property**

The supplier declares and guarantees that the products do not constitute a violation of patents, trademarks, models, copyrights and other intellectual and industrial property rights of third parties and that it is entitled to transfer to the company the full right to use, incorporate and trade the products.

The supplier guarantees the validity of its industrial and/ or intellectual property rights for the production, sale and marketing of the products supplied.

In any case, any product and/ or object and/ or process suitable to be patented was made during the course of the collaboration between the supplier and the company, only the latter shall have the right to patent it and any consequent right of economic use.

The supplier at the request of the company, at the end of the relationship for any reason, will provide the company with all documents relating to these supplies, i.e. Layouts and mathematics.

The orders issued do not imply any transfer to the supplier of rights arising from patents, know-how, and/ or any other intellectual property rights of the company.

The supplier undertakes to reimburse the company for the costs incurred as a result of legal proceedings brought by third parties claiming to have industrial and/ or intellectual property rights in relation to the deliveries.

Violation of the supplier's obligations under this article shall entitle the company to terminate all pending orders to the detriment of the supplier pursuant to article 1456 of the Italian civil code, without prejudice to the company's right to compensation for damages.



#### **m. Insurance**

The supplier agrees to take out and renew each year for the duration of the order an adequate insurance policy with a primary insurance company and with a minimum limit of at least €1,000,000.00 in order to insure its production facilities against the risks of theft, fire, damage, destruction and the risk of third party liability.

The supplier also undertakes to take out suitable product liability insurance to fully cover all damages arising from and/ or related to the product supplied by the supplier to persons or property of third parties. This insurance policy shall never be considered as a limit of supplier's liability.

The supplier shall provide the company with the relevant insurance certificates upon request of the latter, and in any case at least once a year.

#### **n. Termination for breach of contract by the supplier**

Without prejudice to compensation for damages, the company shall have the right to terminate the order by simple written notice pursuant to art. 1456 of the Italian civil code, by which the company declares its intention to enforce the express termination clause, if the supplier commits a breach of the of ours articles of general conditions of purchase and / or in cases expressly provided for by the order and / or the occurrence of any of the following circumstances:

- violation of the requirements and/ or of the minimum technical and performance characteristics of the supplied product established by law and/ or by the order and by the corresponding documents attached and/ or referred to and/ or by the technical specifications;
- delay in the delivery of the products with respect to the terms agreed in the order exceeding 10 days or a different term indicated in the order;
- repeated non-conformities of the products, for a number exceeding 8000 ppm non-conformities of the products over 6 months or the different measure or term set forth in the order;
- if the supplier has failed to comply with any of the obligations set out in the relevant order and following a written warning from the company does not remedy the non-compliance at issue within the prescribed period.

#### **o. Withdrawal**

The company shall have the right to withdraw from any order at any time and for any reason by written notice of not less than 60 days from the date of receipt of such notice.

In case of exercise of the right of withdrawal, the company will be required to pay the supplier only the costs incurred and the price of the work performed the company shall also have the right to withdraw



from the order if the supplier's financial conditions have become such as to put in clear danger the fulfilment of the contractual commitments undertaken by the latter, as well as in case of a change of ownership (including in the case of the transfer of a business or branch of a business) or the supplier's corporate control.

In the event of withdrawal pursuant to this article, nothing shall be owed by the company to the supplier as indemnity and/ or compensation for damages.

**p. Italian legislative decree n. 231/ 2001**

The supplier declares to be aware of and to comply with the provisions contained in legislative decree 231/ 2001 on the administrative liability of legal persons and guarantees that its production process respects human rights, the rights of the child and of women, as well as the rules for the protection of the environment and the code of conduct set out in legislative decree no. 231 of 8/6/2001 and declares that it is not subject to any legal proceedings pursuant to legislative decree 231/ 2001, nor has it been convicted in this sense.

The supplier also declares to have read the organizational model of SOAG group. Existing on the company's website and to scrupulously comply with the principles set out therein.

**q. Prohibition of assignment of the delivery contract - subcontracting**

The supplier may not assign, in whole or in part, the order or the rights and obligations arising from the delivery relationship to third parties, nor may it assign its contractual position without the prior written approval of the company.

The supplier also undertakes not to sell, transfer or assign, even partially, to third parties any claim against the company based on the payment of the amount referred to in each specific order, unless expressly authorized in writing by the company.

In the event that the supplier is willing to subcontract all or part of its services, it must first notify the company in writing of this intention with specific indication of the subcontractor's data and, in any case, the supplier shall remain solely responsible to the company for the correct and timely execution of the delivery service and it undertakes to ensure the conformity of the delivery and the products in accordance with these general conditions of purchase, with the order and with the documents attached to it and/ or referred to by it. The supplier hereby irrevocably grants the company the right to visit the subcontractor's plants to carry out any checks deemed appropriate with regard to the supply of the products.

Violation of the obligations set forth in the preceding paragraph will constitute not a less important breach and it will entitle the company to terminate the delivery contract pursuant to art. 1456 of the Italian civil code, without the supplier being entitled to any compensation and/ or indemnity.



#### r. Environment - safety

The supplier undertakes to supply to the company deliveries fully compliant with safety and environmental standards, as well as in line with the standards in force in the countries of destination identified by the company (in particular certificates of conformity, certifications, etc..).

The supplier assumes full responsibility for any breach of safety and damage to the environment, both towards the company and third parties. In this regard, the supplier guarantees to comply with the provisions of the European reach regulation (EC 1907/2006).

The supplier also undertakes to report, upon request, on IMDS or any other format required by the company, its compliance with the standards and directives 2000/53/EC and its amendments.

In the case of the delivery of machinery or equipment, the supplier undertakes to comply with the laws and regulations in force (machinery directive 2006/42/EC) and to provide the relevant certificates, declarations of conformity and EC marking.

#### s. Checks on the supplier

The supplier agrees to be subject, even at short notice, to quality and/ or financial controls carried out by the company and/ or by any person designated by the company itself. The company may also carry out, always at short notice, checks on the supplier and third parties appointed by it (including any subcontractors) to verify the progress of the delivery.

Any inspection or control by the company at the supplier's plants may not exempt the supplier from its liability under these general conditions of purchase.

#### t. Quality of deliveries

All suppliers that have an influence on the quality of the product are evaluated and, in case of a positive evaluation, are considered "qualified".

Qualified suppliers are included in the company's "qualified supplier list" with an initial score that takes into account the results obtained during qualification (self-assessment questionnaire, or direct visit, or third party certification).

Following the award of the qualification, the company may require the supplier to demonstrate its ability to provide a sample of one or more products in accordance with the requirements of the order and the attached

The first supply of samples is always required when a new product and/ or a product already supplied, but modified, is submitted to an already consolidated supplier. Sample lots must be delivered by identifying them with the words "sampling" on both the containers and the transport documents.



When, with regard to critical characteristics and such as to affect the functionality or safety of the product, there is not the complete correspondence of the sampling to what is required, in this case the supplier may not deliver the product sampled and the document of approval must specify the points of non-compliance that must be corrected to obtain approval. Approval may be granted after a second sample has been sent which complies with all the requirements of the specification.

All samples must be sent by the supplier according to the rules of the 4th edition of the PPAP.

#### u. Applicable law - exclusive jurisdiction

Every delivery contract is governed by Italian law. The exclusive place of jurisdiction for any dispute arising between the company and the supplier in relation to these general conditions of purchase and/or in relation to any delivery relationship to which these general conditions of purchase apply is Turin, without prejudice to the company's right to sue the supplier at the court of the place where the supplier has its head office and/ or a production plant.

If any of the clauses of these general conditions of purchase expressly conflict with the applicable law or the latter cannot be derogated from by agreements between the parties, the contract is not to be considered null and void but applicable for all rules and regulations that do not conflict with the aforementioned law.





# GRI STANDARDS 2021

301 MATERIALITY			
301-1	<b>Material purchased</b>	t	<b>17.918,5</b>
	of which raw material	t	17.918,5
	plastic	t	16.498,7
	rubber	t	1.277,4
	aluminum	t	142,4
	<b>Material sold</b>	<b>t</b>	<b>16.249,9</b>
	of which final product	t	16.249,9
	plastic	t	14.019,3
	rubber	t	1.947,7
	aluminum	t	282,9
	<b>Delta purchased - sold</b>	<b>t</b>	<b>1.668,6</b>
		<i>tot recycled materials/ tot used material</i>	-
	<b>% recycled material to productivity</b>		
		<i>re-used packaging/ sold final products</i>	-
	<b>% recycled packaging</b>		

302 ENERGY			
302-1	<b>Total internal energy consumption</b>	<b>GJ</b>	<b>180.298</b>
	<b>Heating consumption</b>	<b>GJ</b>	<b>42.534</b>
	of which natural gas	GJ	42.534
	of which LPG (Liquified Petroleum Gas)		-
	of which petrol		-
	of which gasoil		-
	of which other fuels		-
	<b>Electricity consumption (local-based)</b>	<b>GJ</b>	<b>141.234</b>
	of which fossil	GJ	85.209
	of which renewable	GJ	46.666
	of which renewable auto-produced	GJ	1.440
	of which nuclear	GJ	7.919
	of which cold water		-
	<b>Sold renewable energy</b>	<b>GJ</b>	<b>3.470</b>

305 GHG EMISSIONS			
	GHG included		CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O
	GWPs sources		IPCC AR6-2022
305-1	<b>GHG emissions Scope 1</b>	<b>mt of CO<sub>2</sub>e</b>	<b>2,207</b>
305-2	<b>GHG emissions Scope 2</b>	<b>mt of CO<sub>2</sub>e</b>	<b>14.771</b>
305-3	<b>GHG other emissions Scope 3</b>	<b>mt of CO<sub>2</sub>e</b>	<b>90,646</b>
	Upstream	mt of CO <sub>2</sub> e	61,124
	Downstream	mt of CO <sub>2</sub> e	29,522
305-4	<b>Intensity of emissions (Scope 1+2)</b>	<b>t of CO<sub>2</sub>/ € revenues</b>	<b>0,083116</b>
	<b>Intensity of emissions (Scope 1+2+3)</b>	<b>t of CO<sub>2</sub>/ € revenues</b>	<b>0,083626</b>
305-5	<b>Reduction target by 2026</b>		
	Baseline (first year emissions calculated)		2019
	<b>Target Scope 1+2</b>		-45%
	% annual residual to reach target		-10,6%
	<b>Target Scope 3</b>		-30%
	% annual residual to reach target		-21,0%



<b>303 WATER</b>			
303-3	<b>Total water withdrawals (W)</b>	<b>m3</b>	<b>26.727</b>
	of which surface water	m3	-
	of which groundwater	m3	2.172
	of which third party water	m3	24.555
	<b>Water re-used by internal pipes</b>	<b>m3</b>	<b>6.496</b>
303-4	<b>Total water discharges (D)</b>	<b>m3</b>	<b>26.727</b>
	Hazardous substances discharges	m3	-
303-5	<b>Water consumption (W-D)</b>	<b>m3</b>	<b>-</b>
	<b>Plants in hydro stress area</b>	<b>nr</b>	<b>14</b>
	Source: <a href="https://ec.europa.eu/eurostat/web/environment/water">https://ec.europa.eu/eurostat/web/environment/water</a>		
	Very low risk	nr	2
	Low risk	nr	5
	Medium risk	nr	4
	High risk	nr	2
	Very high risk	nr	1
	<b>Withdrawals in high risk area</b>	<b>m3</b>	<b>3.365</b>
	<b>Discharges in high risk area</b>	<b>m3</b>	<b>3.365</b>
	<b>Consumption</b>	<b>m3</b>	<b>-</b>
	<b>Withdrawals in very high risk area</b>	<b>m3</b>	<b>2.927</b>
	<b>Discharges in very high risk area</b>	<b>m3</b>	<b>2.927</b>
	<b>Consumption</b>	<b>m3</b>	<b>-</b>

<b>306 WASTE</b>			
306-3	<b>Total waste</b>	<b>t</b>	<b>4.166,25</b>
306-5	<b>Disposal waste</b>	<b>t</b>	<b>1.926,39</b>
	Hazardous waste	t	494,98
	Non-hazardous waste	t	1.431,41
306-4	<b>Not disposal waste</b>	<b>t</b>	<b>2.254,86</b>
	Recycling treatment	t	2.239,86
	Re-used in processes	t	15,00

<b>204-1 Local procurement</b>			
	Suppliers within 100 km by plant deliveries	nr	71
	Suppliers between 100 and 500 km	nr	152
	Suppliers over 500 km	nr	484
	EMEA	%	99,49
	Apac	%	0,27
	Nafta	%	0,24



<b>401 EMPLOYMENT</b>		
	<b>Total nr of employees</b>	<b>nr 1741</b>
	<b>Internal employees</b>	<b>nr 1573</b>
	<b>Nr of workers (internships, work agencies workers)</b>	<b>nr 168</b>
	<b>Female workers</b>	<b>nr 883</b>
	of which manager	nr 20
	of which white collar	nr 129
	of which blue collar	nr 734
	<b>Male workers</b>	<b>nr 858</b>
	of which manager	nr 76
	of which white collar	nr 139
	of which blue collar	nr 643
102-8	<b>Nr of permanent contracts</b>	<b>nr 1318</b>
	<b>Nr of full-time contract</b>	<b>nr 1722</b>
	<b>% of total employees covered by collective bargaining agreements</b>	<b>% 90,35%</b>
401-1	<b>New hires (data regarding only permanent employees)</b>	<b>nr 67</b>
	of which <30 years old	nr 18
	of which 30 ≤ age ≤ 50 years old	nr 37
	of which >50 years old	nr 12
	<b>Hiring rate</b>	<b>% 3,85%</b>
	<b>Leavers (data regarding only permanent employees)</b>	<b>nr 110</b>
	of which <30 years old	nr 30
	of which 30 ≤ age ≤ 50 years old	nr 58
	of which >50 years old	nr 22
	<b>Turnover rate</b>	<b>% 11,25%</b>
401-3	<b>Nr of employees who took parental leave</b>	<b>nr 72</b>
	of which maternity leave	nr 61
	of which paternity leave	nr 11
	employees return on job after parental leave	nr 51
	<b>% return on job</b>	<b>% 70,83%</b>
405-1	<b>Total nr of manager</b>	<b>nr 96</b>
	of which <30 years old	nr 4
	of which 30 ≤ age ≤ 50 years old	nr 64
	of which >50 years old	nr 28
	<b>Total nr of white collar</b>	<b>nr 260</b>
	of which <30 years old	nr 46
	of which 30 ≤ age ≤ 50 years old	nr 154
	of which >50 years old	nr 60
	<b>Total nr of blue collar</b>	<b>nr 1385</b>
	of which <30 years old	nr 277
	of which 30 ≤ age ≤ 50 years old	nr 824
	of which >50 years old	nr 284
	<b>overtime hours</b>	<b>hr 124.621,40</b>



403 HEALTH & SAFETY				
403-9	<b>Internal employees</b>	<i>nr</i>	<b>1.573</b>	Internal workers
	<b>Days loss for injury</b>	<i>nr</i>	<b>374</b>	
	<b>Losses Time Injuries (LTI)</b>	<i>hours</i>	<b>2.992</b>	
	Worked hours	hours	2.582	
	<b>Nr of injuries</b>	<i>nr</i>	<b>9</b>	
	of which fatal injuries	nr	-	
	of which high consequences	nr	9	
	of which first aid (FA)	nr	-	
	<b>Frequency rate</b>	<i>injuries/ worked hours x 1.000</i>	<b>3,49</b>	
	<b>Severity rate</b>	<i>days loss/ worked hours</i>	<b>0,14</b>	
<b>Incidence rate (x100 employees)</b>	<i>nr injuries/ nr workers x 100</i>	<b>0,57</b>		
	<b>External employees</b>	<i>nr</i>	<b>168</b>	external workers
	<b>Days loss for injury</b>	<i>nr</i>	-	
	<b>Losses Time Injuries (LTI)</b>	<i>hours</i>	-	
	Worked hours	hours	-	
	<b>Nr of injuries</b>	<i>nr</i>	-	
	of which fatal injuries	nr	-	
	of which high consequences	nr	-	
	of which first aid (FA)	nr	-	
	<b>Frequency rate</b>	<i>injuries/ worked hours x 1.000</i>	-	
	<b>Severity rate</b>	<i>days loss/ worked hours</i>	-	
<b>Incidence rate (x100 employees)</b>	<i>nr injuries/ nr workers x 100</i>	-		
	<b>Total workers</b>	<i>nr</i>	<b>1.741</b>	Total workers
	<b>Days loss for injury</b>	<i>nr</i>	<b>374</b>	
	<b>Losses Time Injuries (LTI)</b>	<i>hours</i>	<b>2.992</b>	
	Worked hours	hours	2.582	
	<b>Nr of injuries</b>	<i>nr</i>	<b>9</b>	
	of which fatal injuries	nr	-	
	of which high consequences	nr	9	
	of which first aid (FA)	nr	-	
	<b>Frequency rate</b>	<i>injuries/ worked hours x 1.000</i>	<b>3,49</b>	
	<b>Severity rate</b>	<i>days loss/ worked hours</i>	<b>0,14</b>	
<b>Incidence rate (x100 employees)</b>	<i>nr injuries/ nr workers x 100</i>	<b>0,52</b>		

404 TRAINING			
404-1	<b>Employees involved to training</b>	<i>nr</i>	<b>1.044</b>
	<b>Total training hours provided to employees</b>	<i>hours</i>	<b>111.354</b>
	of which general training	hours	106.774
	of which Healt and Safety training	hours	4.580
	of which voluntary training	hours	
	of which training on manufacturing manage system	hours	
	Hour of training per employee (average)	hours/employee	106,66



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