

# SOCIAL ACCOUNTABILITY REPORT for

**G&P NET SpA**

**Peuterey Srl**

**Geo Spirit Srl**



GEOSPIRIT



DEKKER

Date	Prepared by	Checked by	Approved by
26 May 2023	Representative, Social Accountability	Representative, Social Accountability	General Management

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## 1. Introduction

The G&P NET group is pleased to present its Social Accountability Report for 2022.

This document serves to disclose, in a transparent, clear and complete manner, to employees, collaborators, suppliers, institutions and all the people with whom the G&P Net group enters into contact, the aims it intends to pursue for the purposes of guaranteeing a socially responsible work environment and professional growth to staff, in full compliance with the requirements of the SA8000:2014 standard.

For some years, the group has put in place a consistent, conscious path for both social and environmental themes with the aim to stand out as a socially responsible company, pursuing policies aimed at compliance with fundamental workers' rights as well as health and safety in the workplace and the most significant environmental aspects.

This report serves to provide stakeholders and any interested party with the means and tools to check compliance with its company policies.

Specifically, the Social Accountability Report is drawn up on an annual basis and it is the result of collaboration between General Management and members of the Social Performance Team (SPT), the Management representative and all company positions.

The circulation is guaranteed through the publication of same on the website of the organisation and through distribution, in house, to all personnel.

## 2. Group companies

<b>Name</b>	<b>G&amp;P NET SPA – act of incorporation 17/10/2013</b>
<b>Headquarters</b>	Via Tortona, 31 – 20144 MILAN
<b>Registration numbers</b>	REA MI-2029929
<b>Tax ID Code/VAT reg.</b>	02334070469
<b>Company purpose</b>	Styling and design activity, conception and development of fashions

<b>Name</b>	<b>PEUTEREY SRL – act of incorporation 18/11/2016</b>
<b>Headquarters</b>	Via Tortona, 31 – 20144 MILAN
<b>Registration numbers</b>	REA MI-2107853
<b>Tax ID Code/VAT reg.</b>	09700210967
<b>Company purpose</b>	Manufacture and sale of clothing items.

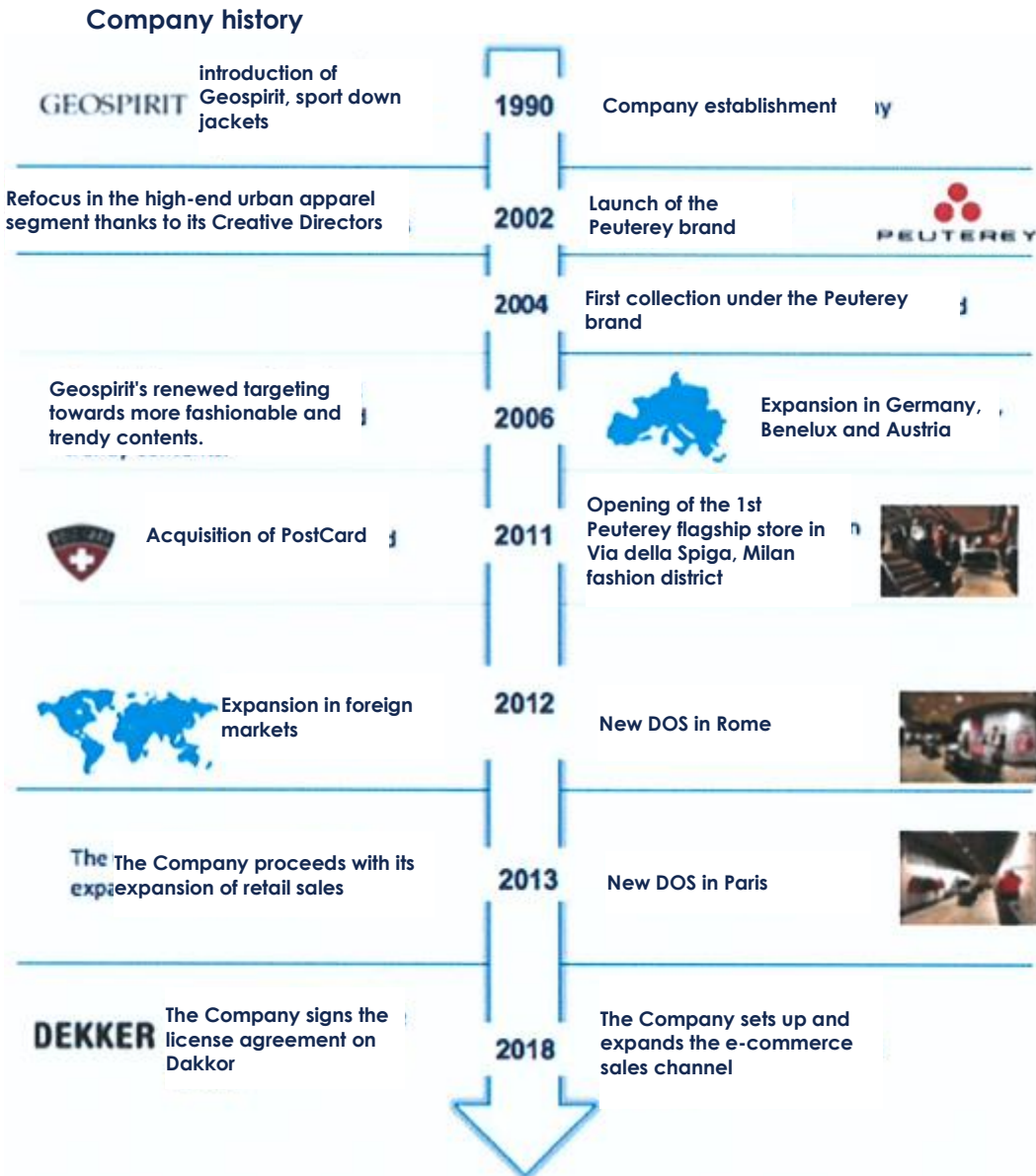
<b>Name</b>	<b>GEO SPIRIT SRL – act of incorporation 04/01/2012</b>
<b>Headquarters</b>	Via Prov.le del Biagioni, 55 – 55011 ALTOPASCIO (LU)
<b>Registration numbers</b>	REA LU - 211180
<b>Tax ID Code/VAT reg.</b>	02263200467
<b>Company purpose</b>	Manufacture of sports items and clothing in general.

## 3. History and product

G&P Net S.p.A. is an Italian fashion company designing, developing and distributing luxury puffer jackets and coats under four different labels: Peuterey, Postcard, Dekker and Geospirit, characterised by a strong brand awareness. The company sells its products with a focus on Europe and is generating increasing revenues in Asia. The whole range of products is distributed through multi-brand stores and, more recently, through directly operated stores (DOS).

Over the last few years, the company has recorded significant levels of growth, becoming a major stakeholder in the Italian fashion market.

The company is part of Elite Path, a Borsa Italiana project to help small and medium enterprises to achieve their growth targets, acquiring industrial, financial and organisational expertise. The ownership of the brands is listed below





The Peuterey brand, introduced in 2002, is the main brand, representing over 90% of total business turnover for the 2019 financial period. The brand takes its inspiration from the name of a peak on Mont Blanc, one of the most fascinating routes on the Alps.

While it commenced as a brand orientated towards winter apparel with a specifically dedicated customer base, Peuterey subsequently began to reach out to new customers, transforming the brand into an accessible luxury label. The brand has given style characteristics to winter down jackets, with parka-based designs, to wear as elegant, luxury coats. The hallmark item of the Peuterey brand is the jacket, but in the last few years, the group has also begun to design and distribute apparel and accessories.

The sporty down jacket has achieved a consolidated position as the brand's leading products and has become an established leader among competing products on the Italian market.

With these star products, the company has been able to acquire a strong, consolidated image as a combination of luxury design with performance and practical wear.

The Peuterey Group targets its products at the cosmopolitan, professional consumer in the 30-45 age range.

## 1. Policies and values

Sustainable development guarantees that the needs of the present can be satisfied without compromising resources and opportunities for future generations. Every action we perform, all of our behaviour and any choice we make can and must mean greater awareness to safeguard the ecosystem on our planet and the well-being of those who live on it. Today, choosing a sustainable lifestyle is in fact the first step towards a better future. The Group works hard every day to reduce its impact on the planet and to make the most of human and environmental resources: this is the choice we have made, and we firmly believe in it.

### 1.1 Mission and Vision

At Peuterey, working for a better future means investing in people and promoting their well-being and professional growth. This is why our approach to sustainability also concerns lifestyle and working rhythm.

In our company, many professionals - from designers to pattern makers, sales division employees, and the communications team - all work in the two main hubs of Milan and Altopascio (LU), alongside colleagues operating in retail and the sales agents who support our products at an international level.

Our people are brought together by the shared values that guide us. We are united by our shared passion for the quality and beauty of what we do, every day. We work together with trust and enthusiasm, looking to our planet with respect and to our future with responsibility.

We care deeply about the value of our differences, since these are things that lead to dialogue, to stimulation, and to growth. We invest in training for our young talents because we believe in merit and in sheer hard work. We support equal opportunities for men and women, because we choose to guarantee that everyone, regardless of sex or gender, has the right to develop their full human and professional potential. To offer all of our workers the opportunity for physical and mental well-being in the workplace, we have introduced a pilates course.

Our social accountability code means we are committed to extending our values and aims to our collaborators, but also also to our production and business partners, in Italy and the rest of the world.

At Peuterey, our projects are people focused. And people's responses, in terms of motivation and commitment, is what makes us more and more aware, eve day, of the worth of having chosen to make a positive impact on society.

## **1.2 Social Accountability Policy**

**The G&P NET group**, representing the companies *G&P NET Spa*, *Peuterey Srl* and *Geo Spirit Srl*, feels it to be fundamentally important to maintain the company's social sustainability and the relevant responsibility that comes from this. The decision to adopt an **SA8000:2014 management system** and therefore, to certify this, is perfectly in line with this course, representing yet another element to **strengthen policies** and **social accountability targets** with regard to workers, helping to boost **widespread awareness** when it comes to socially responsible company operations.

For this purpose, the **G&P NET group** aims to:

- **increase the social accountability** of the company through precise commitments to workers and other stakeholders of reference
- **guarantee transparency in human resource management** through new models of staff involvement
- **monitor the ethics and social correctness** of its supply chain.

The expected benefits of this choice are:

- **increased level of risk management** regarding compliance with social accountability requirements (and the relevant standards of reference), specifically in the supply chain;
- **representing a reliable partner for its customers, at all times** and to commit to guaranteeing compliance with the principles of social responsibility, attention to quality, and to safety in the workplace, both by own employees and those of its suppliers;
- **even greater attention to equal opportunities** and to the capitalising on our diversities;
- **opening a further channel for dialogue** with workers, both as individuals and trade union organisations.

**The G&P NET group** undertakes to:

- comply with current national standards and international conventions and recommendations, including the resolutions of international bodies such as the ILO – International Labour Organization - and the UN - United Nations - organisation, regarding all requirements of the standard
- prohibit the use of child labour (ILO Conventions 182 and 138, and Recommendation 146)

- prohibit forced or compulsory labour (ILO Conventions 29 and 105)
- respect freedom of association and the effective recognition of the right to collective bargaining (ILO Conventions 87, 98, and 135)
- oppose all forms of discrimination and unfair treatment (for employment, remuneration, access to training, promotions, termination of employment, or retirement) based on ethnicity, regional or social origin, nationality, religion, disability, gender, sexual preferences, family responsibility, trade union membership, political opinions and age, or any other condition that could lead to discrimination (ILO Convention 100, 111, 159, 169, 177, 181, and 183)
- condemn all illegal conduct that may hinder dignity or physical and/or moral integrity
- apply national collective bargaining agreements, fully and impartially, to all employees, paying the agreed remuneration punctually, as well as all relevant pension, insurance and social security payments (ILO Convention 131)
- respect working hours, meeting the needs of workers (ILO Convention 1 and Recommendation 116)
- guarantee maternity and paternity protection, as well as protection for disadvantaged persons (ILO Convention 183 and 159)
- promote and improve conditions of safety and the physical and mental well-being of its staff with corrective and improvement actions (ILO Convention 102, 155 and Recommendation 164)
- involve all suppliers of goods, activities and services and their commitment to social accountability, conforming to all requirements in the reference standard
- develop and extend information, communication, and training processes, fostering dialogue among the parties concerned, to ensure efficient and effective application of the integrated company system.

**The G&P NET group** considers that this can all make a solid contribution to improving general operation conditions and to making the most of human resources; for this purpose, it undertakes to convey to all stakeholders (employees, suppliers, customers, public opinion, trade unions, public authorities, and NGOs) a strong message to increase awareness of and compliance with the application of the requirements envisaged in the SA8000 standard.

To ensure that this Policy is understood, implemented and supported at all levels within the company, the Company Management has implemented the following initiatives:

- Displaying a copy of this Policy for view by all staff;
- Publication on the company website (in Italian and English) to boost viewing by all parties concerned.
- Social accountability training and meetings with all staff.

Regularly, at least every six months, the management will assess the suitability and appropriateness of this social accountability policy and assess the achievement of the improvement goals issued for application of the above principles.

The following section contains references to the certification body we have chosen, the SAI, the body which developed the standard, and the SAAS, the accreditation body for SA8000 certification bodies:

### **Certification body**

RINA Services S.p.A. | Via Corsica, 12 - 16128 Genoa, P. +39 010 53851  
[crt.accreditation@rina.org](mailto:crt.accreditation@rina.org)

### **Standard setting and accreditation body**

SAI - Social Accountability International  
15 West 44th Street | New York, NY 10036 Phone: 212-684-1414 | Fax. 212-684-1515  
Email: [info@sa-intl.org](mailto:info@sa-intl.org)

SA AS - Social Accountability Accreditation Services 15 West 44th Street, 6th Floor New York, NY 10036 (212) 391-2106 fax: (212) 684-1515 [saas@saasaccreditation.org](mailto:saas@saasaccreditation.org)

#### **4.2 Social accountability policy for Employment agencies**

In case it is necessary to use employment agencies, the G&P NET group undertakes only to use agencies operating with a valid licence/permit for the activity, according to the law of reference. The G&P NET group undertakes to require compliance from employment agencies with the following requirements:

- No costs or charges for recruitment must be met, either wholly or in part, by workers;
- Job offers must not include costs or expenses for employment to be met by the worker;
- In the event that the G&P NET group is aware of the fact that workers have been charged for costs or expenses, either wholly or in part, the agency shall repay the worker in full;
- Work conditions, as defined at the time of their appointment, must not differ from those envisaged for companies in the G&P NET group;
- Before appointment (including, if applicable, leaving their nation/region of origin), workers are informed of the essential terms and conditions of their employment, either verbally or in writing, by way of a letter of appointment in their local language, as required by law;
- Migrant workers have contracts and equal treatment to that of their fellow workers;

The Management of the G&P NET group undertakes to establish monitoring activities to keep track of the performance of employment agencies in order to ensure the above elements are respected. Acceptance of the above and of the Declaration of Commitment to comply with the requirements of the standard is an essential, critical requirement for collaboration with the G&P NET group.

#### **4.5 Code of conduct**

The G&P NET group is undertaken to ensure that its products are made in compliance with this Code of Conduct. For this purposes, it undertakes to share its common aim and undertaking with partners/customers and suppliers to guarantee the highest social, ethical, and environmental standards, compliant with all applicable legal and binding requirements, the main international human rights conventions (ILO), and other voluntary standards.

The G&P NET group considers it essential to involve its whole supply chain in the application of the principles in this Code of Conduct, requiring its suppliers to comply with the principles stated here below, both during the selection of new suppliers and in the continuation of business relationships.

The G&P NET group in particular, undertakes to comply with the following requirements:

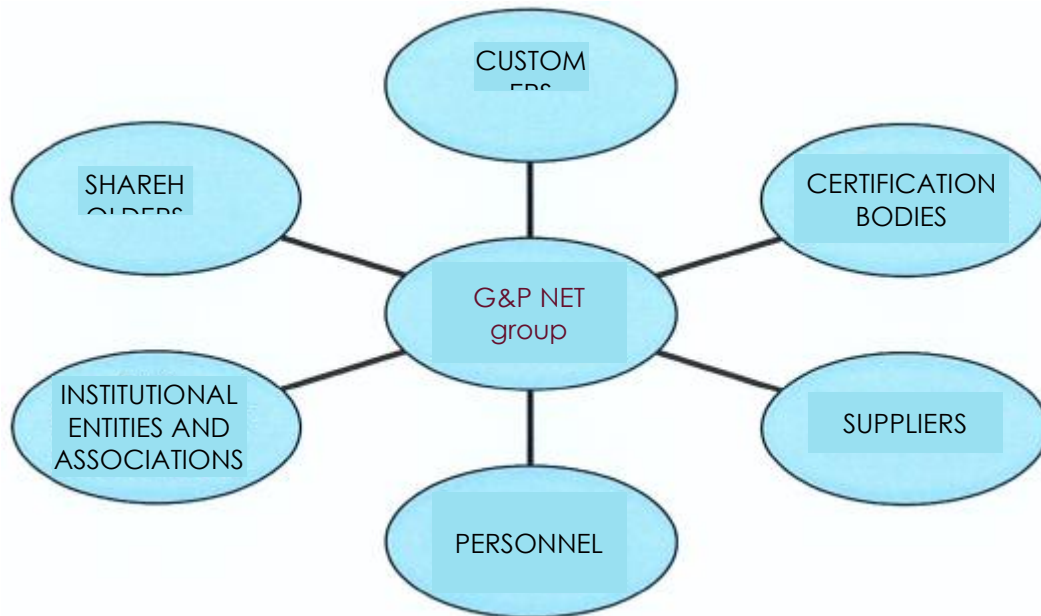
- Equal and respectful treatment of staff
- Dignified, ethical working conditions for staff
- Respect for freedom of association and the right of collective bargaining,
- Absence of child labour or compulsory labour in any form.
- Presence of measures to guarantee working conditions that respect health and safety for staff.
- Absence of any form of discrimination towards staff
- No use of or support for coercion or punishment
- Respect for working hours (including overtime) and the wages agreed with own workers, in order to cover all workers' needs and necessary expenditure
- Measures in place to guarantee finished products that are safe and not harmful to health
- Fair trade practices and conduct through the prevention of corruption and any causes;
- Working attitudes guided by values such as integrity, honesty, contractual fairness and full compliance with all legal requirements.

For this purpose, before commencing collaboration with suppliers, the G&P NET group requires the signing of its Social Accountability Code.

### **5. Stakeholders**

The term "stakeholder" refers to subjects inside and outside the company with any form of interest in the company itself, which is then substantiated into a series of expectations under the form of information needs, economic interests, etc. The following graphic shows the main stakeholders identified by the G&P NET group for the purposes of checking its ability to respond to the needs and requirements of each one through an open, transparent dialogue based on trust.





### Property

Social Accountability for the property of the companies in the G&P NET group is substantiated through compliance with principles such as fair treatment and enhancement of the company

### Staff

The involvement and participation in the definition of the system by human resources, together with top management, is essential for the best outcome of the creation and application of the system. Staff involvement in the G&P NET group is made possible through information, meetings, awareness raising, and training.

### Suppliers

“Supplier” stakeholders include all of the subjects from which the G&P NET group purchases goods or services needed to perform the company activities. The G&P NET group undertakes to raise awareness with its suppliers on subjects of social accountability in order to extend the application of these principles to the whole supply chain.

The G&P NET group has structured a system to select, qualify, monitor and raise awareness with its suppliers, asking them to comply with the rules and commitments that the SA8000 regulation requires it to satisfy.

Suppliers used by the G&P NET group must be able to guarantee, similarly with the management system adopted by the group, compliance with the following requirements:

- not to use or promote the use of child labour in the cycle of activities;
- not to use or promote the use of workers against their wishes or to use any form of work under the threat of punishment;

- to guarantee all workers a safe, healthy workplace and to draw up a careful assessment and management of risks, as well as a suitable training programme in compliance with current regulations;
- to respect the right to freedom of association or trade union membership of its employees, not discriminating against union representatives and promoting collective bargaining;
- not to allow staff to exceed the number of weekly hours set down in the national collective bargaining agreement, if any, or by ILO regulations and conventions, guaranteeing at least one free day every week;
- to prohibit any form of discrimination;
- not to use or promote corporal punishment, physical or mental coercion or verbal violence towards workers;
- to guarantee that wages are never less than minimum wage levels set by legal requirements for the category.

### **Customers**

These are the subjects for whom the products and services provided by our company are designed and made.

The attention that customers apply more and more consistently to the company's constant commitment to quality and social accountability is considered essential. These are values to which the market attributes more and more importance.

### **Institutional entities and associations**

This category includes all of the entities (ASL, INPS, INAIL, Labour Inspectorate, Municipality, Region, ARPAT, Fire Service, Trade Union organisations, Credit institutes and other financing entities) which, for various reasons, enter in contact with the G&P NET group and with which it is possible to develop profitable collaborative relationships as important subjects interested in the growth - in their own area - of company that is strongly orientated towards technological and social development.

Full compliance with current legislation, the utmost transparency in management and procedural terms, and willingness to collaborate are essential guidelines when it comes to company activities.

### **Certifying bodies**

The G&P NET group has chosen Rina Services S.p.A. to certify its social accountability system, By preparing its SA8000 Report, the G&P NET group aims to put all stakeholders in the position to assess the performance of the companies in the group, in terms of social aspects and in the light of envisaged aims and activities.

Regarding the communication forms and principles - including ethical - of its management system, the G&P NET group uses:

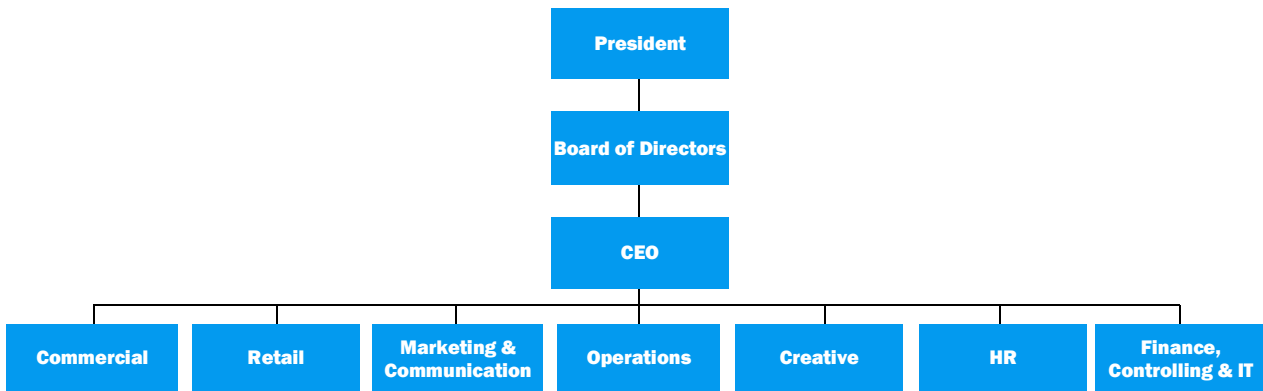
- ◆ websites;
- ◆ circulation of informative documents to customers and suppliers;
- ◆ email service;

and for communication to internal stakeholders:

- ◆ company noticeboards;
- ◆ suggestion boxes located in areas available to staff;
- ◆ meetings and appointments for internal communication to staff;
- ◆ area and/or executive meetings
- ◆ Any other instruments that can be used to circulate social accountability principles.

## 6. Organisational structure

The internal organisational structure of the G&P NET group has been defined and is illustrated below.



### Personnel by function

	Commercial Area	Retail Area	Marketing & Communication Area	Operations Area				Creative Area	Human Resources Area	Finance, Controlling & IT	Group Total
				Product	Technical	Production	Logistics				
Employees	13	58	10	16	21	8	10	5	2	17	160
managers & collaborators	1-2*	1	1-2*	1-3*			1-1*	3*	1	1-1*	19

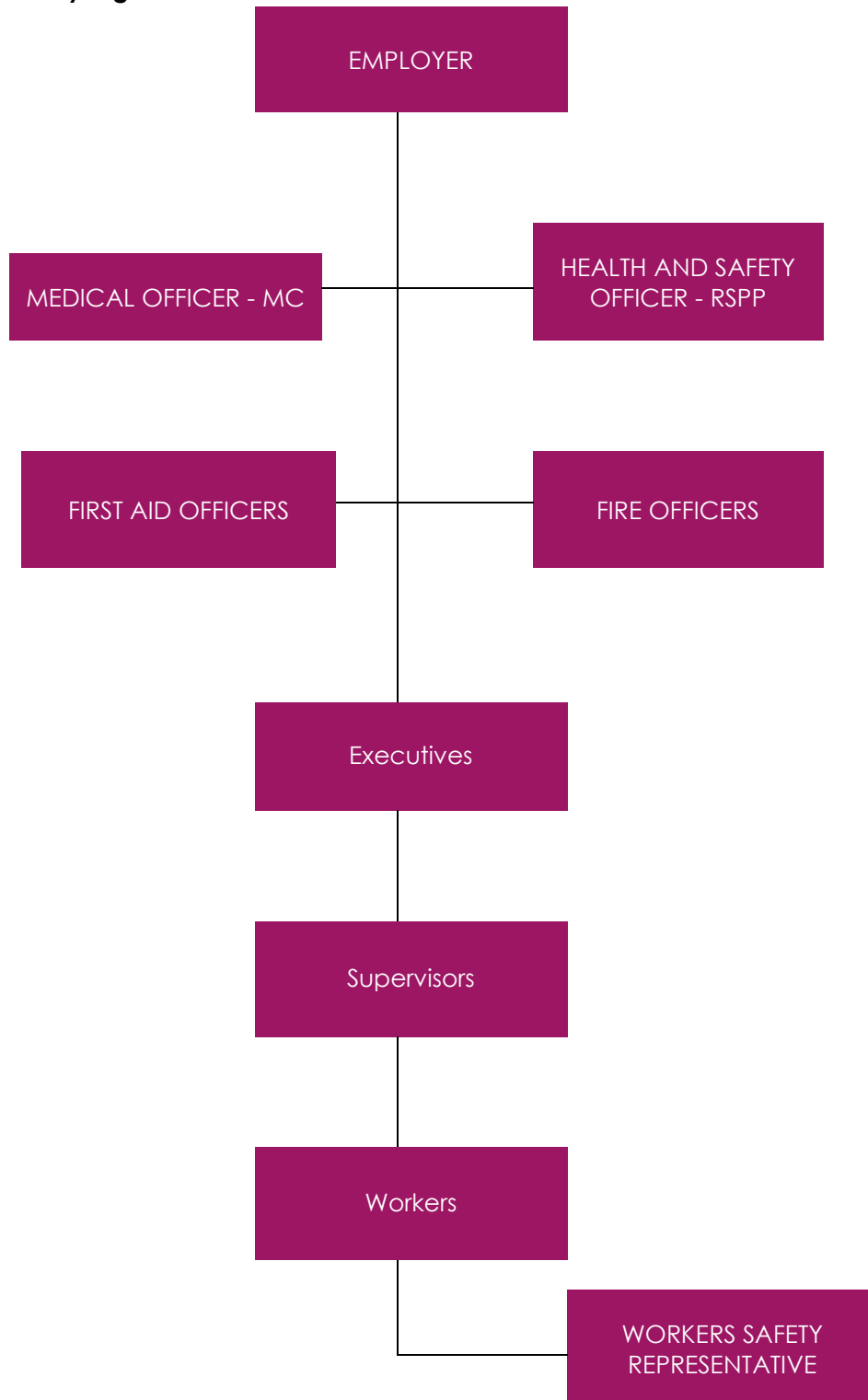
\*cooperation agreements

### Personnel by company

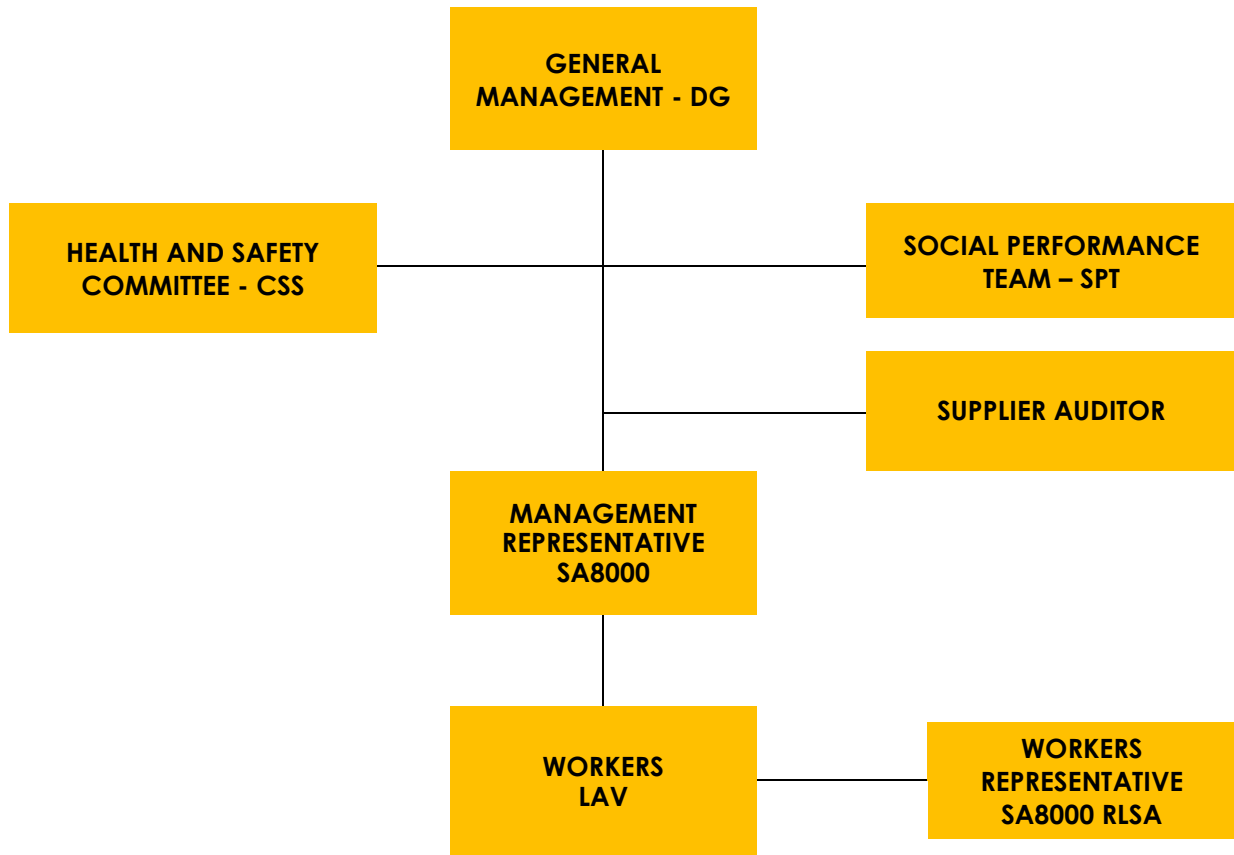
	G&P Nat Spa	Peuterey Srl	Geo Spirit Srl	Argo Retail Srl	Related parties	Group Total
Employees	50	48	9	58	2	167
managers & collaborators	5	5	1	1		12

Regarding the appointments and responsibilities concerning health and safety, the organisation chart is as follows

**Safety organisation chart**



Social Accountability Organisation chart



**7. The value of people**

The G&P NET group has always focused on the strengths of a product of excellence and to achieve these levels, it is aware that people are a value that needs protecting, because people bring in the experience and expertise that are difficult to find on the marketplace. The work of the companies in the group is based on values that are always placed at the very heart of its business activities.

**7.1 Ban on child labour**

**AIMS FOR 2023**

- **We aim to continue with the job of awareness raising when it comes to monitoring suppliers against the use of child labour.**
- **We intend to continue with our project to take part in volunteer initiatives in support of children, with contributions to those associations that work in this area.**

The G&P NET group is committed to never employing child or under-age workers. The G&P NET group has in any case prepared a specific procedure, the **P05 “Procedure against child labour”** where it points out the interventions to be implemented in the event that any under-age workers are found within the company or in the chain of suppliers and/or subcontractors.

It is in any case guaranteed by the companies in the G&P NET group **that only people aged 18 and over will be employed**, and to guarantee that if any erroneous employment procedures are carried out or commenced which do not comply with the prerequisites and regulations concerning the age of the employee, at the time of employment, the company requires a copy of an identity document, in compliance with that stated in the European Regulations for Data Protection, GDPR679/2016.

**Our achievements**

Objectives for 2022	Indicators	Resources and responsibility	Time	Result
Raising of supplier awareness and monitoring of the supply chain	Declaration of commitment signed by suppliers	General Management	31-12-2022	No critical supplier with regard to this requirement

The average age of staff is about 45 years. The following section sets out the composition of the company organisation as at 31 December 2022.

**FORMATION OF EMPLOYEES ACCORDING TO AGE**



As can be seen in the above table, the highest age range is between 36 and 50 years; a physiological increase in average age is the result of a low turnover rate within the company and the presence of long-standing staff, who are integrated with or replaced, from time to time, by younger new employees.

**7.2 Ban on forced labour**

**AIMS FOR 2023**

**We work towards continued improvement regarding the relational aspects among employees and we continuously monitor their satisfaction as well as managing any reports or notifications. During 2023, we will carry out a specific assessment on harassment in the workplace. We take care to raise staff awareness of this subject on a continuous basis.**

The work carried out by all staff in the group companies is absolutely voluntary, and no one is the victim of threats or other intimidation that force them in any way to provide their services.

The G&P NET group applies the regulations in force by law and by the relevant collective bargaining agreements to all staff. Any form of unofficial work, illegal hiring or employment relationships in breach of law is not tolerated.

At the start of employment, the units responsible will require the employee to submit the necessary documents to meet routine obligations (identify card, tax ID code, family status, foreigners' permit of stay, bank details, tax form, severance payment forms, application for family allowance payment, etc.) and will keep only a single copy of each, in full compliance with the European Regulation 679:2016 (GDPR). Staff are in fact provided with a detailed policy statement on the purposes and method of processing personal data.

The HR department, which manages staff with the support of the employment consultants hired, is available at any time to provide information and explanations with regard to the working relationship, to wage statement and the collective bargaining agreements applied, and it makes it possible to consult the contents directly.

Within the G&P NET group, all employees are fully aware of their own rights and duties; during all recruitment stages, staff members are informed of their duties, contract type, classification and any problems related to said duties. At the moment of employment, employees receive a signed copy of their contract, are instructed in reading their wage statement document, and are informed as to how to withdraw from the contract, as set down in the collective bargaining agreement applied.

There are no security guards or audiovisual systems inside the company to control employees, all of whom are free to leave at the end of their working shift. The video surveillance system is installed in compliance with legal requirements and for the sole purpose of guaranteeing security.

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In compliance with that stated in current laws and contracts, we pay advances on severance payments, where permitted and when these requests are formally submitted, but we never make cash loans in order to “tie up” our employees.

### Our achievements

Objectives for 2022	Indicators	Resources and responsibility	Time	Result
Continued improvement to working conditions	Number of reports (if any)	Management Representative SA8000	31-12-2022	No report by employees
Increase employee awareness of the SA8000 regulation	meetings with the SPT and training and awareness-raising meetings	Management Management rep.	31-12-2022	During 2022, a meeting was held with the SPT, and other meetings with the staff, concerning specific suppliers-related aspects.

### 7.3 Freedom of association and right to collective bargaining

#### AIMS FOR 2023

#### We will continue to raise employee awareness regarding employment contract subjects

The G&P NET group respects the rights of all employees to freely join trade unions and to collective bargaining, in full compliance with the current regulations of the collective bargaining agreement and the prevention of any form of discrimination towards union members or representatives. In the event union representatives are elected, they will not be subject to any type of discrimination and can communicate freely with employees in the workplace. Spaces are available within the company for trade union notices, and to hold any union meetings, if required.

Objectives for 2022	Indicators	Resources and responsibility	Time	Result
Increased staff awareness of collective bargaining	Training meetings/meetings with staff	HR	31-12-2022	During 2022, training and awareness-raising process meetings for staff through individual meetings with the HR Department.



7.4 Health and safety

**AIMS FOR 2023**

- We are constantly working to improve ergonomics at workstations and office lighting.
- We continue to pursue a policy of awareness raising among employees on correct health and safety procedures in the workplace
- We are raising staff awareness re the completion of the accident report log concerning accidents and near misses in the workplace.

We are committed to ensuring that work environments are healthy and safe. Our group undertakes not only to meet the obligations set down in Lgs. Decree 81:08 and subsequent amendments and integrations, but also to implement continuous projects to improve worker health and safety. During 2022 too, we worked with our consultants and Health and Safety Officer so that workplaces continue to comply with health and hygiene conditions as required by law and ensuring that employees have suitable environmental conditions to carry out their jobs. Every year, we hold a regular meeting, attended by the RLS, MC and RSPP, analysing health reports by the Medical Officer, comments from the RSPP and RLS, and developments in the improvement plan, scheduling future aims.

The group ensures that accidents and professional illnesses are identified and monitored in order to put in place suitable corrective and improvement actions and to ensure information and basic training, regularly and specifically tailored to the risks present.

There is also an accident log in order to monitor actions and situations with a view to prevention of any situations that may be a source of accidents.

During the last 3 years, there have been no accidents to employees or any professional illnesses.

Accidents		
YEAR	Accidents < 3 days	Accidents > 3 days
2019	0	0
2020	0	0
2021	0	1
2022	0	0

Type of accident	YEARS		
	2020	2021	2022
Fractures	-	-	-
Injuries	-	-	-
Sprains	-	-	-
Muscle problems	-	-	-
Trauma	-	-	-
Bruising	-	-	-
Other	-	1	-

The very low number of accidents and absences due to occupational illnesses is closely linked to prevention and awareness-raising activities, to the organisation of training courses, and to the purchase and distribution of personal protective equipment delivered to employees.

The following summarises the safety training provided in 2022

Type of training	Total number of hours delivered 2022	Recipients
Worker safety State-Regions Agreement low risk	28	Office employees and workers
Warehouse	24	blue-collar workers
Fire safety	42	Fire officers
RLS Training	12	Workers' safety representative
Employees	58	Area manager and department supervisor
Chemical risk	8	Cleaning

**Our achievements**

Objectives for 2022	Indicators	Resources and people responsible	Time	Result
Worker training and updates	Total hours of training	H&S Officer	31-12-2022	The staff is trained on the subject of health and safety (see above)
Lack of accidents and/or occupational illnesses	Index of frequency and index of severity for accidents	H&S Officer	31-12-2022	During 2021 0 accidents and 0 professional illnesses
Maximum security to prevent Covid-19 infections	Monitoring of compliance with prevention protocols	H&S Officer	31-12-2022	Continued controls have been carried out to audit the procedures required in the Covid Protocol by the Covid Committee and the persons met.

**7.5 / employees**

The human element and the experience of our staff represent the strong points of our group and the element that has allowed us to continue to grow throughout these years in business.

This is why, in our Group, we make best use of the individual and protect equal opportunities, starting with the recruitment process to then continue along a personal growth path for each one, thanks to our constant investments in training. Our policies contribute to creating an environment where each employee will find an effective answer to their needs in terms of familiar management and mental wellness.

**7.6 Staff recruitment and turnover**

Staff recruitment and management policies are defined based on principles and practices defined by the General Management. As stated in the policies and code of conduct, staff recruitment is the task of competent officers and complies with company values, the ethical principles of the Code and all of the applicable legal standards at both national and European levels. The recruitment and management of staff are based exclusively on skills- and merit-based criteria, and are applied in compliance with human rights, and condemning all forms of discrimination.

By applying the principles and values of its code of conduct, the G&P NET now implements its own recruitment policy for employees. In line with the principle of making best use of talents and skills and in response to job applications or the need to manage staff turnover, first of all research is carried out through external recruitment channels, such as advertisements on specialist websites, direct deposit or examination of the CV database.

Each new employee has an established recruitment path. At the end of the integration process, an assessment is made of the path, which normally coincides with the end of the trial period, as per contract.

**7.7 Training and skills development**

The G&P NET group implements staff development and training processes. Every year, the General Management of the group, in conjunction with the responsible officers, carries out an analysis of training requirements in various environments. Supervisors report on staff training needs, sharing them to Management.

This collected material is used to create and issue a training plan. The training plan implements training paths aimed at continued upgrades and accompanying changes of position or organisation. The plan includes specific moments for the integration of new resources that, through specific paths and on-the-job training, help and facilitate hand-overs. All in-house training courses regarding health and safety and SA8000 are subject to assessment at the end of the event.

The following section sets out the training activities of the G&P NET group during 2022:

Type of training	Total number of hours delivered 2022	Total number of hours delivered 2021	Total number of hours delivered 2020	Recipients
Social accountability training (SA8000)	32	0	148	Group staff
Training for second party auditors at suppliers'	10	2	64	Team appointed to carry out audits at suppliers'
Company marketing	0	100	40	Digital marketing team
Digital alphabet	0	200	0	Office employees
Project Management	176	0	0	Project supervisors
Supply chain	176	0	0	Supply chain area managers
English	108	0	0	Selected staff
Excell	340	0	0	Selected staff

**7.8 Well-Being of Employees**

Our company regularly monitors the satisfaction of its staff with climate surveys that evaluate every aspect, including relational, and to intervene with improvement actions.

Our priority objective as part of employment relations is to combat any type of discrimination.

**7.9 Non-discrimination approach**

**AIMS FOR 2023**

- Maintenance of existing non-discrimination situation
- Regular monitoring of employee satisfaction, including through questionnaires

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We combat all types of discrimination and unfair treatment of staff, during the employment process, for remuneration, access to training, promotions, termination of employment, or retirement, and based on ethnicity, regional or social origin, nationality, religion, disability, gender, sexual preferences, family responsibility, trade union membership, political opinions and age, or any other condition that could lead to discrimination.

In order to ensure that no discrimination has taken place, we undertake to:

- select employees considering objective elements such as experience, skill, professionalism, and education, all with regard to the position to be filled;
- pay a salary to each employee, based on their duties and in compliance with the collective bargaining agreement;
- promote employees based on the ability of the individual and the organisational needs of the company;
- achieve training for all, according to organisational and development needs, the individual's possibility to participate, and professional growth opportunities for employees;
- retire employees based on current regulations;
- carry out dismissals in the cases envisaged by law and under no circumstances for discriminatory reasons.

For the purpose of preventing any type of discrimination during work, we have prepared an anonymous mechanism for complaints (comments box) which allows workers to report any discrimination suffered and the company to put in place all of the necessary measures to avoid a repeat of the event. At the moment, this tool has never been used by workers. The table below states the roles covered within our organisation. There is an equal division between male and female staff

### Levels according to gender

Level	2020		2021		2022	
	men	women	men	women	men	women
Management	0	0	0	0	0	0
Executives	9	2	5	2	9	2
Office staff	20	51	19	49	19	46
Blue-collar workers	1	10	1	9	2	8
Consultants	0	0	5	3	5	4

### Composition of the workforce, according to contractual type

Contract type	2020		2021		2022	
	men	women	men	women	men	women
Permanent contract	0	0	21	56	29	53
Temporary	9	2	1	2	0	2
Office staff	20	51	19	49	18	45
Blue-collar workers	.	10	1	9	2	8
Apprenticeship	1	1	0	1	0	1
Part time (permanent)	0	0	0	8	1	9
Part time (temporary)	0	0	0	1	0	0
Employment services	0	0	0	0	2	2
Stage	0	0	0	0	2	1

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On-demand contracts	0	0	0	0	0	1
Other forms of collaboration	0	0	5	3	5	4

**Our achievements**

Objectives for 2022	Indicators	Resources and responsibility	Time	Result
Maintenance of existing non-discrimination situation	Number of complaints/reports	SA8000 workers representative	31-12-2022	No report from staff

**7.10 Disciplinary practices**

**AIMS FOR 2023**

- **Continued regular monitoring of disciplinary action**
- **Continued awareness raising for staff on the correct conduct for the workplace.**

We have always fought against any type of coercion, including verbal towards people and we consider dialogue and a constructive approach to be essential in solving problems, in line with our company ethics and culture.

To act in terms of prevention within this environment, we have issued company regulations pursuant to collective bargaining agreements and to Art. 7 of the Workers' Charter.

Company regulations are signed by employees at the time of their employment, in order to share the workers' rights and obligations, defining the company regulations at the same time.

During the last three-year period, the following disciplinary sanctions have been applied to employees.

Sanctions	2019	2020	2021	2022
Written warnings	0	1	0	0
Fines	0	1	0	0
Suspension	0	0	0	0
Dismissal	1	1	0	7

**Our achievements**

Objectives for 2022	Indicators	Resources and responsibility	Time	Result
Raising awareness and information to staff on the correct conduct to maintain in the workplace	Constant monitoring of disciplinary sanctions	Workers Representative SA8000 and General Management	31-12-2022	In 2022 , meetings were held with area management on occasions of the monthly meetings

**7.11 Working hours and remuneration**

**AIMS FOR 2023**

- **More information and training for workers on the composition of their wage statement**

The Group abides strictly by that set by law and the national collective bargaining agreement regarding work hours and payment, and workers have been duly informed on work hours and conditions of contract.

In correspondence with periods of peak production, workers can also work overtime, for which they are duly paid. In any case, the group guarantees that overtime will not exceed that agreed in collective bargaining.

Any changes to the distribution of hours over the course of a week are to be agreed with employees, as is the planning of holiday periods, paid leave and other leave.

Paid holidays are agreed between the employer and employee, taking the needs of both into account. Company regulations explicitly state the procedure to follow to request holidays and paid leave.

Year of reference	Total no. hours overtime	Total no. hours furloughed	Total no. hours worked
2019	320	0	149,299
2020	59	44,377	116,971
2021	62.30 (laboratory staff only)	42345.30	131360
2022	423	0	121,756

**Our achievements**

Objectives for 2022	Indicators	Resources and responsibility	Time	Result
To monitor the use of overtime	Not to exceed the legal limits envisaged in the collective bargaining agreement of reference	General Management	31-12-2022	To monitor the use of overtime. Overtime is done only on a very occasional basis.

Our group applies the relevant collective bargaining agreement regulations to all employees, guaranteeing fair and decent remuneration according to their skills and pay grade.

Contractual formats mainly used in the company are permanent, temporary full-time agreements.

The group does not use project contracts or temporary jobs.

Every day we are committed to ensuring our employees have all of the guarantees necessary for family allowances, deductions and other forms of integration to minimum income, as established in national collective bargaining agreements, ensuring, in case of need, that advances and loans are provided to employees. We are also available to staff, through the HR office or directly to the employment consultant, to provide any clarifications needed regarding their wage statement.

We inform each employee, at the time of delivering the wage statement, of all of the main elements included, in order to guarantee the correct understanding of the document.

### Our achievements

Objectives for 2022	Indicators	Resources and responsibility	Time	Result
Prompt monitoring of grade and duties allocated to staff	Compliance with that stated in the applicable collective bargaining agreement	HR Director	31-12-2022	Continued monitoring of personal data



**9 Communication is key to sharing**

Internal communication, if it is true that communication is not what we say but what others understand, is a discipline that has become an essential means to ensure all employees are in line with the principles, values and objectives.

We are working to boost bottom up and top down communication with regular meetings with employment representatives, thanks also to the establishment of the *Social Performance Team*, a body formed following SA8000 certification, and which is an important driver for comparison, exchange and carry over to Management of problems and suggestions from staff.

Specifically, following the employee satisfaction survey, it emerged that it was necessary to improve communication with staff.

For this purpose, regular meetings were set up with managers of the sector on the occasion of the "monthly meetings" where aspects pertaining to the internal communication are analysed, and those responsible are motivated in the important role of coordinating and involving staff. The group's aim is to consolidate the role of the company's area/sector managers and to boost maximum internal involvement.

Another important aspect is represented by outside communication with our stakeholders. We are working to revise the company website to publish information and communication about our commitment to social accountability.

**10. Complete management to guarantee social accountability**

**10.1 Supply chain control**

Supplier selection and the management of the supply chain are important steps in the application of social accountability processes. During 2022 we have been able to share our commitment to compliance with social accountability principles with our suppliers, using a request for information and the completion of a self-assessment questionnaire and signature of the social accountability code, as well as undertakings to comply with our values.

Supplier reliability is an essential point to be kept under control; wanting to make the most of sustainability in relationships with suppliers, we have drawn up a selection procedure considering the parameters for sustainability and social accountability, and we have created a team of second-party auditors to carry out audits at our most critical suppliers.

During implementation of the social accountability management system SA8000:2014, our company has carried out careful assessments of the potential risks in all supplier categories, followed by assessments of individual suppliers, acquiring information and self-certification for compliance with the envisaged requirements.

The following diagram shows the main supplier categories and the relevant critical nature with regard to social accountability aspects

<b>Supply category</b>	<b>Potential risk index</b>
<i>Outerwear manufacturers</i>	High
<i>Manufacturers of commercialised goods</i>	High
<i>Logistics</i>	Medium
<i>Raw materials and accessories</i>	Medium
<i>Employment agencies</i>	High
<i>Maintenance of infrastructures, systems and machinery</i>	Medium
<i>Suppliers of equipment and machinery</i>	Medium

**11. Commitment to advanced certification standards**

In line with the strategic decision to develop a management system that ensures total control of all the aspects linked to its company processes and contributes to their consolidation, during 2021, our company obtained SA8000:2014 certification.

### **SA8000:2014 certification**

The G&P NET Group holds certification A8000, in full compliance with regional, national and international laws and standards on human rights, as well as the regulation that includes:

- Risk assessment extended to all standard requirements, identifying the aspects that have the highest risks of breaching said requirements and/or to the expiry of performances of social accountability, also integrated with SAI Guidelines on risk assessment concerning the healthcare emergency.
- A company organisation chart, complete with job description for all positions in the group and including the allocation of roles and responsibilities.
- Social accountability policy
- The procedures drawn up for the purposes of providing detailed descriptions of the methods used to carry out activities that need to be performed for compliance with the SA 8000
- Company regulations
- The records to provide evidence that the system is being correctly managed (non-compliance, corrective actions, SA8000 reports, supplier monitoring plans, etc.).

### **Social Accountability Policy**

The Management has drawn up a document containing the Social Accountability Policy to ensure that its desire to make products that guarantee customer satisfaction and economic results for the company, but in compliance with the requirements of the SA8000 standard as well as with collective well-being.

The social accountability policy has been circulated to workers and to all stakeholders, and is available by clicking the link and accessing the company website.

### **SA8000 representatives**

During the initial stage of project development, the General Management appointed the HR manager as responsible for the management system, while staff appointed a workers' representative for SA8000, elected by workers' votes, with the commitment to interface with the management in terms of questions inherent to Social Accountability. During 2022, 1 meeting was held with the SPT. The team includes a balanced representation of management members and workers' representatives for SA8000 (RLSA8000 and RLS).

### **Planning and implementation**

In drawing up and/or updating the documents, taking into account all of the legal prescriptions existing and applicable to our organisation; in the rare cases in which two legal prescriptions deal with the same issue and provides different provisions for each one, we have always considered the more restrictive one for our company as well as those most in favour of the workforce.

The Social Performance Team will also complete the following activities:

- Preparation of risk assessments in the various points of the regulation;
- Hold regular meetings between staff and representatives;
- To boost the performance of audits, checking the results and promoting any requests for corrective actions or improvements.

### **Internal and external audits**

As part of the Social Accountability System, internal audits and monitoring activities were all carried out during 2022 to examine the suitability of activities to the SA8000 standard, for the purpose of ensuring the system's suitability.

The SPT will take charge of efficient monitoring of activities in the workplace; this is to monitor compliance with standards and the implementation of planned actions, to deal with risk areas identified by the SPT and the effectiveness of the measures implemented to satisfy company organisation policies and standard requirements.

Internal audits were performed by our consultant, Dr Valentina Poli to assess compliance with SA8000 during 2022.

During the audits, some elements emerged (recommendations for the purpose of improvements, in house) regarding health and safety, on the subject of staff management. The group promptly took on board these findings, opening the relevant corrective actions.

### **Staff training**

Training and information have begun to involve staff on the requirements of the SA8000 standard, and the objectives and policies of the Social Accountability Management System.

Those responsible have been working alongside specialist technicians who have provided them with information and ideas for the implementation of the system.

All employees have been able to attend specific training sessions, with the aim of boosting participation and sharing in social accountability aims.

A detailed training plan for all staff has been issued for 2022.

### **Re-assessment of management and outside communication.**

The Management, in conjunction with the Representative for Social Responsibility, will re-examine the Management system at least once a year, to check its suitability and appropriateness, as well as the continuing efficiency of company policy, procedures and results, in compliance with the requirements of the standards and other requisites signed by the company.

To facilitate this re-assessment, a series of indicators has been defined. These are significant and major factors that can highlight the achievement of set targets as well as to define further goals.

The positions and interests of workers are protected by the SA8000 representative, who plays a precious role of mediation between the needs of workers and those of company management.

The representative undertakes to inform interested parties of the company SA8000 Social Accountability Policy and Report. For this purpose, the companies have chosen the corporate website to communicate with all interested parties and specifically, with customers, suppliers and public administrations.

### **Problems and corrective actions**

The G&P NET group has established a written procedure to deal with complaints and reports involving the management of non-conformities, using a system to collect and manage complaints and allow workers and other parties concerned to point out situations that do not conform to SA8000.

- Workers have been informed of the possibility to forward complaints in different manners:
- Anonymously, using the suggestion box;
- Through the SA8000 representative;
- Directly to Management;
- Directly to the certification body.

The Group does not make use of disciplinary actions or dismissal, and not does it discriminate against employees or stakeholders who have provided information on SA8000 compliance or who have made complaints on the workplace.

### **Access to checks and entries**

The G&P NET group is available to provide information and allow access to stakeholders to check fulfilment of SA8000 requirements.

The HR department is able to illustrate the operation of the system to stakeholders and to provide visits to the production plant. The group has asked its suppliers to provide the same information and the possibility to access facilities.

To date, we have not received any request from stakeholders to access facilities and check compliance to SA8000 requirements; nor have we received explicit requirements from our customers with regard to SA8000 participation.