

Reportings and/or complaints management procedure

Management Systems

Document ID code	AZ-D804
Availability	Q:\SA8000
Language	English
Version	1.0 of 31/10/2023
Pages	7
Classification	PUBLIC
Status	Approved
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Summary	The purpose of this procedure is to provide interested parties (workers, customers, suppliers, etc.) with the methods for reporting and/or complaining about possible non-compliance by aizoOn with the requirements expressed by the SA8000:2014 standard.

Changes

Version	Date	Description of the change
1.0	31/10/2023	First issue of the document

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1 PURPOSE OF THE DOCUMENT

The purpose of this procedure is to provide interested parties (workers, customers, suppliers, etc.) with the methods for reporting and/or complaining about possible non-compliance by aizoOn with the requirements expressed by the SA8000:2014 standard.

2 SCOPE OF APPLICATION

This procedure is applied to all reportings and/or complaints from any interested party concerning compliance with the requirements expressed within the SA8000 standard.

3 REGULATORY REFERENCES

- SA8000:2014 - IV. SOCIAL ACCOUNTABILITY REQUIREMENTS - Point 9.

4 TERMINOLOGY AND ABBREVIATIONS

TERM/ACRONYM	DEFINITION
CEO	Chief Executive Officer
SAMSM	Social Accountability Management System Manager
WRSA	Workers' Representative for Social Accountability

5 OPERATING MODES

5.1 REPORTINGS AND/OR COMPLAINTS BY EMPLOYEES

Employees may report and/or complain in relation to facts and events of an abusive, offensive or illegal nature occurring in the workplace and contrary to the principles of social accountability contained in the SA8000 standard as follows:

- Via the Workers' Representative for Social Accountability, by forwarding the reporting and/or complaint verbally (it is his/her right to ask to remain anonymous) or in writing using the SA8000 - MSA_SA_04A - SA8000 REPORTINGS/COMPLAINTS form (signed or anonymously).
- Via the special "SA8000 Reportings and/or Complaints Box" located on company premises using the SA8000 - MSA_SA_04A - SA8000 REPORTINGS/COMPLAINTS form (signed or anonymously).
- By sending an email to sa8000reporting@aizoongroup.com which guarantees confidentiality and ensures that it is received by both the Workers' Social Accountability Representative and the Social Accountability Management System Manager.

- Using the anonymous reporting platform whose link is available on the corporate website <https://aizoongroup.com>.
- Through the Certification Body for SA8000 (SI CERT - Via SS 18 N°119-121 Loc. Ponte Barizzo - 84047 Capaccio-Paestum (SA), Italy - email: reclamisa8000@sicert.net).
- Through the Accreditation Body for SA8000 (SAAS Social Accountability Accreditation Services - 15 West 44th Street, 6th Floor - New York - NY 10036 - Telephone: +1 –(212)-391-2106 - email: saas@saasaccreditation.org).

5.2 REPORTINGS AND/OR COMPLAINTS FROM OTHER INTERESTED PARTIES

Interested parties may report and/or complain in relation to facts and events of an abusive, offensive or illegal nature occurring in the workplace and contrary to the principles of social accountability contained in the SA8000 standard as follows:

- Via the Workers' Representative for Social Accountability, by forwarding the reporting and/or complaint by sending an email to sa8000reporting@aizoongroup.com, using the SA8000 - MSA_SA_04A - SA8000 REPORTINGS/COMPLAINTS form (it is your right to ask to remain anonymous).
- Using the anonymous reporting platform whose link is available on the corporate website <https://aizoongroup.com>.
- Through the Certification Body for SA8000 (SI CERT - Via SS 18 N°119-121 Loc. Ponte Barizzo - 84047 Capaccio-Paestum (SA), Italy - email: reclamisa8000@sicert.net).
- Through the Accreditation Body for SA8000 (SAAS Social Accountability Accreditation Services - 15 West 44th Street, 6th Floor - New York - NY 10036 - Telephone: +1 –(212)-391-2106 - email: saas@saasaccreditation.org).

5.3 GUARANTEE OF ANONYMITY AND NON-DISCRIMINATION

aizoOn, upon receipt of the reporting and/or complaint, guarantees

- The strictest confidentiality on the facts contained in the same.
- The right to maintain anonymity.
- Not to apply any form of discrimination against the sender in the case of non-anonymous reportings and/or complaints, or if it is possible to identify the sender.

6 REPORTING AND/OR COMPLAINT MANAGEMENT

aizoOn is committed to handling all reporting and/or complaints received, anonymous or not.

The complaint is managed by the SAMSM, which coordinates its resolution by activating the necessary corrective actions.

With reference to reports from internal staff, the WRSA and the SAMSM, will check, on a weekly basis, the presence of reports and/or complaints in the special box, to which they have the exclusive key, and in the e-mail account.

Guarantee of anonymity and protection:

All organisational functions/positions of aizoOn involved in the receipt and processing of reportings, must guarantee the absolute confidentiality and anonymity of reporting persons, without prejudice to legal obligations and the protection of the Company's rights.

aizoOn does not tolerate any form of threat, retaliation or similar actions against employees who have made or collaborated in making the reporting.

Anonymity:

Anonymous reportings indicated above will also be taken into account, provided they contain circumstantiated facts, and not reportings of generic and/or confused content, to which the provisions indicated below will apply *mutatis mutandis*.

Protection from *mala fides* reportings:

The Social Performance Team (SPT) guarantees an adequate response to *mala fides* reportings, censuring such conduct and informing individuals in cases of established *mala fides*.

The reporting, therefore, must present an analytical description of the circumstances reported, relating them to specific contexts, so as to allow due verification to be carried out; it must also be made in good faith, i.e. it must not contain information based on mere suspicions or rumours or false information made with malice or guilt.

The unlawful conduct may refer to situations of which the reporting party has direct knowledge, by virtue of the employment relationship, but it may also be information acquired by chance on the occasion of and/or due to the performance of work duties at a location other than the usual place of work.

The reporting form to be used is the same for anonymous and non-anonymous reportings (MSA_SA_04A).

In cases in which the reporting and/or complaint are not anonymous, aizoOn favours the direct meeting and exchange of evaluations with the subject author of the same, supported by the WRSA, in order to acquire complete knowledge of the facts in order to give concrete support to the subject who may be the recipient or witness of forms of abuse, offence or other phenomena of impropriety or illegality, always guaranteeing anonymity towards other subjects.

aizoOn always guarantees to make every effort and concrete action necessary to solve the highlighted problem and to prevent the occurrence of similar situations.

Upon receipt of the report (both internal and external), the SAMSM carries out the following activities:

- Records the Report in the MSA_SA_04B SA8000 Reportings Register.
- Evaluates the need for further investigation of the reporting and makes any requests for integration (where possible).
- Analyses/verifies the validity and truthfulness of the reporting.
- Involves the WRSA and, if considered appropriate and/or applicable, any other members in the analysis of the report.

On the basis of the findings of the analysis of the Reporting:

- If the reporting is not supported by elements that can determine its truthfulness and well-foundedness, the SAMSM gives a reply to the interested party motivating the conclusion (if the reporting is not received anonymously), informs the Management and updates the SA8000 Reportings Register.
- If the reporting proves to be true and well-founded, a nonconformity (NC) of the Social Accountability Management System is opened, identifying the appropriate Corrective Actions (CA). The SAMSM updates the Register of SA8000 Reportings until the relevant actions are closed.
- If the reporting concerns a proposal/item for improvement of the Social Accountability Management System, it is evaluated during the periodic meetings of the SPT for possible integration among the input elements of the SA8000 Management Review; also in this case, the reporting is recorded in the SA8000 Reportings Register.

The registration of the reporting, the investigation of the case and the management of any NC are managed in full respect of the confidentiality of the reporting party and other company figures involved (names or circumstances directly traceable to a specific individual must be subject to confidentiality).

6.1 RESPONSE TO REPORTING AND/OR COMPLAINT

aizoOn is committed to provide evidence of the receipt of reportings and/or complaints within 10 working days of their receipt by the WRSA and the SAMSM, by means of an acknowledgement of receipt, thus allowing the interested party to verify that the organization has taken charge of them and the time estimated and necessary for their resolution, depending on the subject.

aizoOn also commits, within 15 working days from the date of acknowledgement of receipt, to provide the subjects affected by the reporting and/or complaint with communication regarding what has been decided and implemented for its resolution. The communication may take place in different ways, established each time by the SAMSM depending on the subject.

The same procedure is implemented for reportings received through the platform dedicated to anonymous reportings, the link to which is available on the corporate website. With regard to each reporting/complaint, the SPT meets and provides, each within its own sphere of competence, for the analysis of the reporting and the search for the cause of the NC, the definition of the remediation action and the opening of the necessary AC. If the reporting is made anonymously, the remediation action and the CA, if any, will be brought to the attention of the reporting party, through communication of the improvement plan in place, or the implementation of the remediation action for the problem detected. From the reporting, a CA may be triggered. From suggestions and/or proposals, preventive or improvement actions may result.

7 ATTACHMENTS

- MOD MSA_SA_04A Complaint Reporting Form
- MOD MSA_SA_04B Reportings and Complaints Register

8 ARCHIVING

The Social Accountability Management System Manager (SAMSM) archives the procedure for a period of three years.