

OPERATING INSTRUCTION IO52

SUGGESTIONS, COMPLAINTS AND RECOMMENDATIONS FOR IMPROVEMENT

TABLE OF CONTENTS

1. Scope
2. Terminology and abbreviations
3. Remedial actions
4. Communications regarding suggestions, complaints and/or recommendations for improvement
5. Anonymous complaint for SA 8000

Rev.	Issue date	Reason/Amendment	Writing up RSI	Approval DIR	Review RD
00	08/05/2013	First issue			
01	27/09/2013	References integrated into the Tab. of Sect. 2			
02	30/06/2016	General review for adoption of UNI EN ISO 9001:2015, UNI EN ISO 14001:2015 and SA 8000:2014			
03	30/04/2018	Section 4: methods of communication of resolutions following anonymous complaint			
04	25/11/2019	SAAS contact details upgraded			
05	10/06/2020	General review for adoption of UNI ISO 45001:2018			
06	14/07/2022	SGS and SAAS contact details upgraded; more details on how to manage reports			

1. Scope

The scope of this operating instruction is to ensure that the staff of BAGGIO S.p.A. Trasporti Combinati (hereinafter simply BAGGIO) and other interested parties can avail themselves of suitable tools for:

- 1) undertaking remedial actions;
- 2) communicate suggestions and/or tips for improvement.

2. Terminology and abbreviations

DIR	("DIRezione") Management
RD	Management Representative
RLE	Workers Representative for Ethics (SA 8000)
RSI	Head of Integrated System Management
SPT	Social Performance Team

3. Remedial Actions

If Workers find that situations involving the violation of their rights have occurred or are occurring in BAGGIO, then they must inform - also verbally - the Workers' Representative for Ethics (RLE).

Examples of violations are:

- forced labour;
- limitations on the freedom of association and the right to collective bargaining;
- discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age;
- corporal punishment, mental/physical coercion, verbal abuse;
- overtime work required on a non-voluntary basis;
- remuneration lower than the legal minimum standards.

The person who submitted the report cannot be subjected to disciplinary action, dismissal or other forms of retaliation.

The RLE promptly notifies the Social Performance Team (SPT) about the reporting and its content.

After each reporting, *the SPT* will act to ensure that BAGGIO puts in place the necessary actions to:

- a) put an immediate end to any situations of rights violation;
- b) remedy the breaches;
- c) *reply to the report within MAXIMUM 3 WEEKS from the date of submission.*

The SPT must ensure that for the implementation of remedial action, enough suitable resources have been allocated to address the nature and severity of the issue. The SPT shall also monitor the effectiveness of these remedial actions.

It is the faculty of RLE, as it is of any Worker who considers it appropriate, to contact BAGGIO's management (DIR), or the certification body SGS ITALIA S.p.A., or the SAAS (Social Accountability Accreditation Services), which coordinates worldwide certifications in the field of Ethics.

The next page gives the related references.

4. Communications related to suggestions, complaints and/or tips on improvement

All BAGGIO's workers can send communications to the RLE or to the SPT on:

- suggestions aimed at improving conditions of safety, environmental and social conditions within the organization;
- areas of improvement related to working methods;
- improvement suggestions, complaints or other indications.

Communications can also be received by the RLE anonymously. In this case it is appropriate that they be delivered to the RLE in a sealed envelope to ensure the anonymity of the sender.

On receiving notifications, the RLE must:

- 1) assess their merits;
- 2) forward them to the competent department if he/she does not have enough information/skills on the matter;
- 3) use improvement tips/suggestions or reports in a timely manner;
- 4) inform the SPT.

Except for communications received anonymously, senders are kept informed as to the actions undertaken and their outcomes. *He/She will also not be subjected to disciplinary action, dismissal or other forms of retaliation.*

5. Anonymous complaint for SA 8000

To submit suggestions/complaints/recommendations for improvement/reports of other type is available the appropriate Mod. 09-02 "Anonymous Complaint for SA 8000". This form can be used by both the staff of BAGGIO and other interested parties.

In this case, BAGGIO communicates the resolution modes in this way:

- in case of internal reporting (suggestion box) by display on the BAGGIO's bulletin board;
- in case of external reporting through the first usable review of the Corporate Sustainability Report.



SHIPPING & CHARTERING - MULTIMODAL LOGISTICS

IMPORTANT NOTE:

Those who do not wish to personally deliver the report to the Workers' Representative for Ethics (RLE) or directly to BAGGIO's management can also send a **COMPLETELY ANONYMOUS** form with their comments, using the attached form, with all additional relevant comments.

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