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PRODECURE FOR THE MANAGEMENT OF STAKEHOLDER COMPLAINTS AND SUGGESTIONS

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1 SCOPE

This Procedure has the objective of defining the stakeholder (workers, local and national organizations, unions, NGOs, trade associations, clients, etc.) complaints and suggestion management modalities as they relate to the compliance with the requirements of the SA8000 Standard.

2 APPLICABILITY

The procedure applies to all grievances received from any of the interested parties and regarding compliance with the SA8000 Standard and, generally, human rights and health and safety in the workplace.

3 DEFINITIONS

- SPT: "Social Performance Team – Work group having the role of gathering and handling complaints and suggestions pursuant to SA8000 within the company;
- Complaint: "Report, comment, suggestion regarding the workplace and/or the conformity (whether real or presumed) to the SA8000 Standard."

4 REFERENCE DOCUMENTS

Unless otherwise specified, the following reference documents must be taken into consideration as they are in their last approved version:

- Integrated HSEQ Management System doc. No. PI10000-000-ML-5000;
- Manuale del Sistema di Gestione per la Responsabilità Sociale SA 8000 No PI10000-ML5001;
- BTP INFRASTRUTTURE CODICE ETICO
- BTP INFRASTRUTTURE M.O.G.231
- BTP POLITICA DELLA SOCIETA'
- PI10000-000-PR-5003_00_ non_conformity
- PI10000-000-PR-5004_00_ corrective_actions

Reference Standards:

SOCIAL ACCOUNTABILITY 8000 – Giugno 2014

ISO 9001:2015 § 7.1 Resources
 § 7.1.2 People
 § 7.2 Competence

ISO 14001:2015 § 7.1 Resources
 § 7.2 Competence

ISO 45001:2018 § 7.1 Resources
 § 7.2 Competence

5 OPERATING MODALITY

5.1 Receipt of the complaint

Workers and stakeholders can submit a report and/or complaint regarding facts and events taking place within the work context and that go against the principles of social responsibility outlined in the SA8000 Standard.

The modalities for submitting notices/complaints are as follows:

- Via SA8000 Worker Representative, by communicating the report/complaint verbally;
- Using the appropriate "Complaint and Suggestions Box" located near the entrance of the office. Complaints filed there can be signed or anonymous;
- Through employee representatives within the SPT at the following email addresses:
 - Lourier.v@btpinfra.it
 - Romeo.i@btpinfra.it
- Through the certification body at the following addresses
 - DNV Business Assurance Italia Srl Via Energy Park, 14 - 20871 Vimercate (MB)
tel 0396899905 - e-mail: feedback.italia@dnv.com



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- Through the Accreditation Body for SA 8000 - SAI at the following addresses
 - SAAS Social Accountability Accreditation Services 15 West 44th Street, 6th Floor- New York, NY 10036
Phone +1-212-684-1414 –
e-mail: saas@saasaccreditation.org

The employee representative for SA 8000, on a weekly basis, checks the presence of any reports and/or complaints in the designated Complaints and Suggestions Box (for which they have the keys in exclusive form) or through the other means described above, and shall notify the SPT thereof.

Anyone who submits a report/complaint has the right to the maximum confidentiality and to the maintenance of anonymity. In any case, if it were possible to trace who submitted the report/complaint or if it were not forwarded anonymously, BTP guarantees protection from any form of discrimination to the worker/parties concerned.

5.2 Complaint Management

The complaint is handled by the SPT, which coordinates its resolution with management, bringing in the relevant functions and activating the necessary corrective actions as provided in the appropriate procedure. There where the complaint is submitted anonymously, BTP guarantees effort and concrete actions suitable to solving the problem which has been brought to light and to prevent the occurrence of similar situations. If the report/complaint is not anonymous, the SA8000/SPT Committee carries out meetings with the worker who has submitted the report/complaint in order to acquire a complete knowledge of the facts so as to give concrete support to the worker who may be the recipient or witness of abuse, offense or other phenomena of impropriety or illegality, always guaranteeing their anonymity towards other subjects.

The Certification Body and the Accreditation Body handle complaints through their own procedures.

BTP does not enact and does not foresee any form of retaliation or discrimination against the complainant.

5.3 Response to the Complaint

BTP undertakes to inform the complainant of corrective actions to resolve the reported facts, within strictly necessary time limits, related and proportionate to the actions to be taken.

6 RECORDS

Complaints forwarded to BTP are noted in a special log where evidence is given of the subject of the complaint, its origin, the person assigned to handle it at the operational level, and the corrective actions that were taken to implement it. Entries in the complaint log are entrusted to the SPT. BTP undertakes to



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inform the complainant of the corrective actions to find solutions to the reported facts, within the time limits strictly necessary, related and proportionate to the actions to be taken.