

COMPLAINT MANAGEMENT

ARKIMEDIA SRL

Approved by the Board of Directors

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1. INTRODUCTION

Arkimedia srl aspires to become a market leader in the high-end segment of watch strap supply. This corporate ambition is pursued in full compliance with the provisions of the law, especially those related to environmental protection and occupational safety.

Arkimedia srl recognises the importance of ethical and social responsibility in conducting business and company activities, and is committed to respecting the legitimate interests of its stakeholders (shareholders, directors, employees, collaborators, customers, suppliers, and business partners).

Arkimedia srl therefore intends to do business by developing an economy based on knowledge and innovation. An economy that is sustainable, more resource-efficient, greener, safer, and more competitive, while also promoting social and territorial cohesion.

Arkimedia srl embraces the value of the company as its 'heritage' and promotes its values, which include:

- Respect for human rights;
- Enhancement of labour, employment, and working conditions;
- Environmental protection and efficient use of natural resources;
- Anti-corruption efforts;
- Consumer protection;
- Community development;
- Sound fiscal governance.

This requires all employees and collaborators of Arkimedia srl to comply with current laws issued by both the Italian State and by the European Community, as well as any other authority, supranational or national, empowered to impose binding regulations. Compliance also extends to company procedures, internal circulars, and adherence to this code.

The members of the Board of Directors are expected to be guided by the principles of the Code of Ethics when setting objectives, proposing investments, and implementing new projects, as well as in any actions and decisions. This consideration is particularly important given that the sector in which our company operates continues to undergo major changes, constantly presenting us with ethical, social, and legal considerations.

It is also for these reasons that this document has been prepared, compliance with which is of fundamental importance for the efficiency, reliability, and reputation of the company.

2. PURPOSE AND SCOPE

All direct collaborators of Arkimedia srl, as well as external parties, may report:

- Comments and recommendations
- Anomalies
- Incidents
- Complaints

Regarding the workplace and non-compliance.

These cases will be referred to below as 'complaints'.

3. OPERATING PROCEDURES

Under no circumstances will Arkimedia srl take disciplinary action, dismiss, or discriminate against any of its employees for reporting or filing complaints.

4. WHO CAN SUBMIT A COMPLAINT

All workers can send complaints, independently and without asking permission. The staff of suppliers or external parties may also do so using the methods outlined below. Members of the general public may also submit a complaint.

5. HOW TO SUBMIT A COMPLAINT

a. Direct reporting

To the Management: Riccardo Milani rmilani@arkimediagroup.it

To the Head of Human Resources: Michela Zampieri mzampieri@arkimediagroup.it

To the Operations Director: Mattia Longo mlongo@arkimediagroup.it

b. Reporting by anonymous letter

An anonymous letter can be sent to the address:

Arkimedia srl - Via Mario Visentin 14/A, 35012 Camposampiero (PD)

The letter will be collected by the Head of Human Resources.

c. Reporting to the Workers' Representative

A complaint can be made by contacting the Health and Safety Officer.

6. WHO RECEIVES AND EVALUATES COMPLAINTS

Complaints will be received and jointly evaluated by the Management and the Head of Human Resources.

An evaluation must be carried out for each complaint (internal and external) to understand:

- a. The significance of the complaint for social responsibility
- b. The clarity and completeness of the information provided
- c. The potential underlying causes
- d. The impacts on the company, stakeholders, and the management system

7. ACTIONS FOLLOWING RECEIPT OF A COMPLAINT

Complaints must be promptly acknowledged and the team must propose appropriate measures and/or solution.

Based on the nature of the complaint, the working group will determine how communication regarding the matter will be disseminated to all relevant employees.

The working group will be responsible for overseeing and monitoring the implementation of the decided-upon actions until their completion.

8. STAYING INFORMED ABOUT COMPLAINT MANAGEMENT

The working group is responsible for correctly informing the workers and involved stakeholders about the handling of complaints.

Information to workers is provided by displaying a copy of this assessment report on the notice board, which should include a clear summary of the activities carried out. External parties who have made a complaint, if identifiable, will be informed through the most appropriate means by the working group.

THE BOARD OF DIRECTORS