Social and Environmental Responsibility report Year 2021



Date	Drawn up by	Verified by	Approved by
11.04.22	RSG	SPT	Direction

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1. Introduction

LUBE S.r.l. is pleased to present the Social Responsibility Report for the year 2021.

This document aims to disseminate the objectives that LUBE Srl intends to pursue in a transparent, clear and complete way, to employees, collaborators, suppliers, customers, institutions and all the people with whom the company comes into contact.

Our goals have the purpose to:

- a socially responsible work environment and professional growth of personnel in full compliance with the requirements of the SA8000: 2014 standard;

- controlled management of environmental aspects with a view to awareness and improvement of one's performance, both for the reduction of consumption and for the development of environmental sustainability projects.

LUBE SrI has already started a coherent and aware route on both social and environmental issues since 2009 with the desire to stand out as a socially responsible company, pursuing policies aimed to:

- the observance of the fundamental rights of workers and at the health and safety of workplace conditions;

- attention to environmental aspects;

- ensure the highest quality of its products through the systematic control of manufacturing processes;

- guarantee the safety of its products from a chemical point of view.

This Report intend to provide the means and tools to verify observance with its corporate policies to stakeholders and anyone interested.

Specifically, the Social Responsibility Report is drawn up annually and is the result of the collaboration and involvement of the Management itself and of the members of the Social Performance Team (SPT), of the Management System Manager and of all corporate functions.

Its diffusion is guaranteed through the publication of the same on the website of the organization www.lubesrl.it and through its distribution within the organization itself.

2. The company

LUBE Srl established in 1983		
7, Via Catalani Alfredo - 50050 Cerreto Guidi (FI)		
tel 0571 581182		
fax 0571 581183		
email <u>lubesrl@lubesrl.it</u>		
website <u>www.lubesrl.it</u>		
Number REA FI 361930		
03388310488		
Design and manufacture of knitwear accessories		

3. History and products

LUBE was founded in 1962 by the parents of the current owner, **Claudio Lunardi**. For about 25 years the productions went in parallel: knitwear, finished women's products, accessories for the clothing industries.

Over time, the company has undergone a clear transformation with the only specialization in accessories and with a service of yarns ready in stock. Today LUBE focuses its attention on quality and trendy products; in fact, it is no coincidence that the existing customer is made up of the best international brands.

The production includes the use of the following worsted and carded varns; pure cashmere, cashmere blend, pure wool, merino,



carded yarns: pure cashmere, cashmere blend, pure wool, merino, extra merino with angora, pure cotton,



silk, silk and cashmere, polyester, nylon, acrylic wool blend, viscose, superkid mohair, etc... for all these yarns LUBE has a good stock service in various colors in its warehouse. All yarns are mixed with a special type of elastic during their production. Furthermore, LUBE uses the latest generation of electronic machinery in the manufacturing process, for all gauges.

Following a growing investment, especially in recent years, LUBE has gradually led to almost 100% of its production being carried out within the company, without making use of external laboratories: even the fulling of the carded yarns is carried out by LUBE. All this in order to improve quality and service.

LUBE's manufacturing consists of collars, cuffs, inserts, bands, ribs, polo collars, t-shirt cuffs and modeling of fabrics lowered according to customer requests.

LUBE has been working for years in compliance with the principles of social and environmental responsibility, already since 2009, through an important photovoltaic system of approximately 100 kW which produces clean energy and works in a totally independent way from the point of view of energy consumption.

In 2019 it obtained the SA8000:2014 certification which represents the first important certified milestone. Since 2019 it has started a process of analysis and application of the STeP standard of OEKO-TEX® and of the international standard UNI EN ISO 9001:2015., with the achievement of both certifications between June and September 2020.

Over the years, LUBE has developed its mission with the utmost attention to customer needs and through an increasingly targeted and timely response service.

LUBE's MISSION:



LUBE Srl Quality and excellence of products and services, attention and timeliness in responses to the customer,

guided by principles of environmental sustainability and social responsibility



4. Policies and values

4.1 Social Responsibility Policy

LUBE Srl considers the social aspect of the company and the resulting responsibility to be very important. The choice to adopt a SA8000: 2014 management system and then to certify it fits coherently into this path, representing a further element of strengthening the policies and objectives of social responsibility towards workers and helping to fuel the widespread sensitivity towards a management socially responsible.



For these reasons LUBE Srl intends:

- To increase the company's social responsibility through the assumption of precise commitments aimed at the workers;
- To ensure transparency in the management of human resources through new ways of involving workers;
- To control ethics and social correctness in the chain of suppliers and contractors.

The expected advantages of this choice are:

- increase the level of monitoring of risks relating to compliance with social responsibility requirements (and the related Italian laws) in particular in the supply chain;
- always represent for its customers a reliable partner committed to ensuring compliance with the principles of social responsibility and attention to quality and occupational safety of both its employees and those of suppliers;
- further attention to equal opportunities and the enhancement of diversity;
- opening of a further channel of dialogue with workers, both towards individuals and towards trade union organisations.

LUBE Srl undertakes to:

- Comply with current national legislation, international conventions and recommendations, including the resolutions of international bodies such as the ILO International Labor Organization and the UN United Nations Organization regarding all the requirements of the standard;
- Ban on the use of child labour (ILO Conventions 182, 138 and Recommendation 146;
- Ban on the use of forced labour (ILO Conventions 29 and 105);
- Respect the freedom of association and the right to collective bargaining (ILO Convention 87, 98, 135);
- Combat all forms of discrimination and unequal treatment (in recruitment, pay, access to training, career promotions, termination of employment or retirement) based on issues of ethnicity, territorial or social affiliation, nationality, religion, disability, gender, sexual preferences, family responsibilities union membership, political opinions and age or any other condition that could give rise to discrimination (ILO Convention 100, 111, 159, 169, 177, 181, 183);
- Condemn all illegal conduct likely to come into conflict with dignity or physical and/or moral integrity;
- Completely and impartially apply the national collective labour agreement to all employees, punctually paying the established salary and paying all the related social security, welfare and insurance contributions (ILO Convention 131);
- Respect working hours by meeting the needs of workers (ILO Convention 1 and Recommendation 116);



- Guarantee the protection of maternity and paternity, as well as disadvantaged people (ILO Convention 183 and 159);
- Promote and improve the conditions of safety and physical and mental well-being of its collaborators with improvement and corrective actions (ILO Convention 102, 155 and Recommendation 164);
- Involve all suppliers of goods, activities and services and their commitment to social responsibility by complying with all the requirements of the reference standard;
- Develop and extend information, communication, education and training processes and promote dialogue with interested parties, to ensure efficient and effective application of the company's integrated system.

LUBE Srl believes that all of this can make a decisive contribution to improving the general conditions of management and enhancement of human assets and, to this end, undertakes to send all interested parties (employees, suppliers, customers, public opinion, trade unions, public authorities and NGOs) a strong message aimed at awareness, compliance and application of the requirements set out in the SA8000 standard.

- To ensure that this Policy is understood, implemented and supported at all company levels and by all collaborators of the organization, the Company Management has implemented the following initiatives:
- Display a copy of this Policy for inspection by all staff;
- Publication on the company website (in Italian and English) to facilitate viewing by all interested parties.
- Training and meetings with all staff on social responsibility.

Periodically, at least every six months, the management evaluates the continued suitability and adequacy of this social responsibility policy and verifies the achievement of the improvement objectives issued for the application of the principles set out above.

Below are the references of the certification body that we have chosen, of SAI, the body that developed the standard, and of SAAS, the accreditation body of certification bodies in the SA8000 area:

Certification body for \$A8000, ISO 9001 schemes

RINA Services S.p.A. | Via Corsica, 12 - 16128 Genova, P. +39 010 53851 <u>crt.accreditation@rina.org</u>

SA8000 standardization 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 SAAS - Social Accountability Accreditation Services 15 West 44th Street, 6th Floor New York, NY 10036 tel: (212) 391-2106 fax: (212) 684-1515 saas@saasaccreditation.org

Step By Oeko Tex certification body

Centro Tessile Cotoniero e Abbigliamento S.p.A. I - Piazza S. Anna, 2 · 21052 Busto Arsizio (VA) info@centrocot.it · www.centrocot.it



4.2 Social Responsibility Policy for Employment Agencies

LUBE Srl undertakes to contact only private employment agencies operating with a license/authorization for the activity valid according to the relevant law.

LUBE srl also undertakes to guarantee compliance with the following requirements which we ask you to approve at the bottom of this document:

• No expenses or costs for recruitment are borne in whole or in part by the workers;



- Job offers must not include any costs to be paid by the worker;
- In the event that LUBE SrI becomes aware that the workers have incurred all or part of the expenses or costs, the agency will have to reimburse the workers in full;
- The working conditions must not differ from those envisaged at LUBE SrI as defined at the time of hiring;
- Prior to employment (including, if applicable, before leaving their home country/region) workers are informed of the basic terms and conditions of employment, either verbally or in writing, via a letter of employment in their local language as required by law;
- Migrant workers have contracts and treatment equal to that of their colleagues.

The Management of LUBE Srl undertakes to establish monitoring activities and to keep track of the performance of private employment agencies to ensure that the aforementioned elements are respected. Acceptance of the above and of the Declaration of Commitment to Compliance with the requirements of the Standard is a fundamental and essential requirement for collaboration with LUBE Srl.

4.3 Policy for quality, environment and safety

The Management of LUBE SrI has decided to implement an integrated management system in compliance with the principles of quality, sustainability of textile processes, the environment, health and safety and social responsibility, undertaking a certification process in compliance with

SECURITY

ENVIRONMENT

QUALITY

the SA8000, UNI EN ISO 9001 standards, STeP of OEKO-TEX®. The Management of LUBE Srl intends to guarantee within its organization the

controlled management of all the aspects and requisites envisaged by the standards indicated above and in particular:

- controlled management of its production processes in order to meet customer needs and product safety;
- management of chemical products both in reference to the health and safety of workers and the
 external environment and to the content of dangerous or prohibited substances in the articles
 produced. This objective is pursued in particular through a careful selection and evaluation of
 suppliers of raw materials (yarns) and third-party processing (in particular dyes) in order to verify
 compliance with the regulations in force envisaged and in the continuous awareness and training
 of personnel and collaborators on the correct use of all chemical products during production
 and/or manufacturing processes (see Chemical Safety Policy Document);
- management of environmental aspects both in terms of compliance with current legislation and in reference to the possibility of improving the environmental performance of the plant in terms of activities carried out, production and articles made above all in the fields of energy saving and in reduction, separation and recycling of waste;
- management of health and safety aspects in the workplace both as regards compliance with current legislation and the possibilities for improvement, in particular with reference to risk Pagina 7 di 32



assessment, the use of collective and individual protective equipment and staff training personal.

The integrated quality-safety-environment management system is based on the following fundamental points:

- Risk assessment for the health and safety of workers and products
- Assesment of significant environmental aspects
- Evaluation of the explicit and implicit expectations of customers and all interested parties both from the point of view of product and service quality
- Provision of financial, human and instrumental resources to achieve the objectives
- Formalization of procedures for keeping the most critical aspects and company practices under control
- Assessment, qualification and periodic monitoring of suppliers
- Staff training and awareness so that they are aware of their role in the company both from the point of view of environmental protection and their own and colleagues' health and safety
- Definition of control plans and periodic internal checks (audit) in order to verify compliance with the binding and signed legislation, compliance with the procedures and achievement of the improvement objectives
- Periodic review by the Management of the non-conformities detected, of the accidents and incidents, of the complaints of customers and of all the parties, of this policy and of the objectives and programs implemented
- Pursuit of continuous improvement of environmental and health and safety performance according to feasibility and economic sustainability criteria
- Maintaining active internal and external information channels regarding environmental problems and the protection of workers' health and safety
- Use of systems compliant with the most up-to-date technologies, both for the protection of the environment and of workers
- Preventive evaluation of both new materials/production processes and for the modification of existing ones, in order to identify and keep the environmental, safety and performance aspects under control, trying where possible to reduce their negative effects
- Checks and maintenance on existing systems by progressively adopting the most suitable safeguard measures through improvement interventions
- Issue and application of an emergency plan to manage any environmental incidents and/or accidents
- Information and continuous awareness of its suppliers of goods and services regarding the general principles of this policy so that a relationship of effective collaboration can be established
- Periodically review this policy and objectives and programs.

To maintain and improve the results achieved on issues of environmental protection, safety and customer satisfaction, the participation of all staff and their representatives is required. Therefore everyone, within the scope of their respective duties and responsibilities, must consider the topics indicated in this policy as topics of primary importance, integral and inseparable from their work activity, and are called to suggest improvement proposals pertaining to their own area of activity.

The Management of LUBE Srl is available for an open and constructive dialogue with each employee/collaborator, supplier and with all the Bodies institutionally responsible for monitoring their work activities.

This policy is drawn up and signed by the Management which undertakes, also through its representatives, to apply it and to disseminate its principles to company personnel, suppliers, customers and all interested parties, by means of the communication tools available.



4.4 Chemical Safety Policy



LUBE SRL through this policy intends to offer safety and trust to its reference stakeholders and in particular to customers, consumers and workers on the conscious use of chemical substances.

LUBE srl undertakes on an ongoing basis to fully understand the risks associated with chemical substances and to prevent accidents from occurring by keeping workplaces healthy while respecting ecosystems and the environment.

LUBE srl is always attentive to changes in the market and to those that occur in the legislative and regulatory environment on prohibitions and limitations on the use of substances harmful to the environment and to

people. The founding principles regarding the management of chemicals are as follows:

- Offer maximum peace of mind regarding the chemical composition of the items supplied which are always safe and healthy for the community and the environment. To this end, LUBE has implemented procedures for the management of chemical substances by intervening on all processes, from purchases to production, up to distribution. At the request of its customers, it promptly provides information on the chemical substances contained in its products. Furthermore, LUBE periodically carries out tests and laboratory analyses to verify the compliance of the products with the legal and contractual requirements stipulated with its customers. In guaranteeing this principle, it involves and raises the awareness of its suppliers of yarns and outsourced processes (including dyers) by requesting the signing of commitments and laboratory tests (when deemed necessary).
- Provide peace of mind for all employees. LUBE srl has created and maintains a healthy and safe work environment, identifying the dangers associated with the use of chemical substances and constantly carrying out activities to reduce the chemical risk, through the constant search for products that have lower levels of danger. LUBE Srl prevents possible injuries or illnesses to the detriment of employees during the handling and use of chemicals, guaranteeing the necessary training and providing suitable personal protective equipment required by the chemical risk assessment.
- Ensure commitment to integrity and corporate social responsibility awareness. LUBE srl, knowing the impact of the chemical substances used on health and the environment, manages them accordingly, using the chemical substances in the most efficient way possible, to reduce the quantities used to a minimum. It constantly verifies the possibility of choosing chemical products on the market with a lower environmental impact and/or the development of alternative technologies that could allow the substitution of substances dangerous for the environment.

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LUBE SrI takes care to ensure that its products are manufactured in compliance with this Code of Conduct. To this end, it undertakes to share the common goal and commitment to ensure high social, ethical and environmental standards with its partners/customers and suppliers in compliance with all applicable legal and mandatory requirements, the main international conventions on human rights (ILO) and voluntary standards (e. g. SA8000 Standard, OEKO-TEX® STeP Standard).

LUBE SRL considers it essential to involve its entire supply

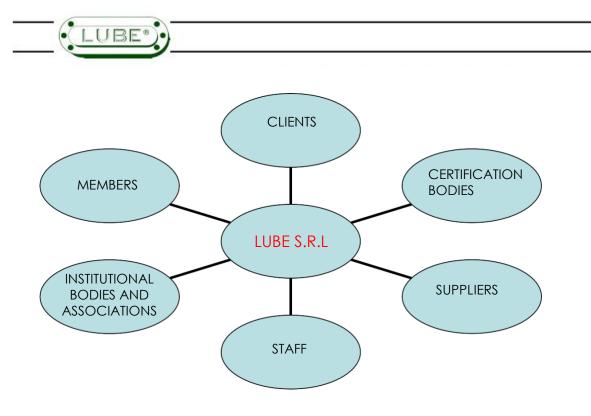
chain in the application of the principles contained in this Code of Conduct, requiring its suppliers to comply with the principles set out below both in the selection of new suppliers and in the continuation of commercial relations.

In particular, LUBE undertakes to comply with the following requirements:

- Fair and respectful treatment of personnel
- Dignified and ethical working conditions for personnel
- Respect for the freedom of association and the right to collective bargaining
- Absence of child labour and compulsory in all its forms and expressions
- Existence of measures to ensure working conditions of personnel in compliance with health and safety
- Absence of any form of discrimination against staff
- Non-use or support of forms of coercion or punishment
- Respect of working hours (including overtime) and of the remuneration agreed with its workers in order to cover all the needs and expenses necessary for the workers
- Measures to ensure that finished products are safe and not harmful to health
- Development and use of environmentally friendly technologies and chemical products
- Measures for efficient use of resources and progress towards green chemistry
- responsible waste disposal and a precautionary approach to environmental challenges
- Fair business behaviour and practices through the prevention of corruption and possible lawsuits;
- Working attitudes guided by the values of integrity, honesty, contractual correctness and full compliance with all legal requirements as well as the criteria of the OEKO-TEX® STEP requirements.

5. Stakeholder

The term "stakeholder" refers to people inside and outside the company who have an interest of any kind towards the company itself, which takes the form of a series of expectations in the form of information needs, economic interests, etc. The following chart shows the main stakeholders identified by LUBE Srl to verify the ability to respond to the needs and requests of each through an open, transparent and trust-based dialogue.



Members

Social responsibility towards them is expressed through respect for principles such as equal treatment and valorisation of the company.

Staff

Their involvement, participation in the definition of the human resources system, together with the company's top management, is fundamental for the successful implementation and application of the system. The involvement of the staff of LUBE Srl is made possible through moments of information, meeting, awareness and training.

The number of employees/collaborators at 31/12/2021 is 28.

Suppliers

The stakeholder "Suppliers" includes all the subjects from which the Company purchases goods or services necessary for the realization of business activities. LUBE Srl is committed to sensitize its suppliers on issues of social responsibility, in order to extend the application of these principles to the entire supply chain.

The company has structured a system for the selection and qualification, monitoring and awareness of its suppliers, asking them to comply with the rules and commitments that the SA8000 standard requires them to fulfil.

The suppliers used by the company must guarantee, similarly to the management system adopted by LUBE SRL, compliance with the following requirements:

- not to use or encourage the use of child labour in the cycle of activities;
- not to use or encourage the employment of staff against their will and to resort to all forms of work under threat of punishment;
- ensure a safe and healthy workplace for all workers and develop a careful risk assessment and management and an appropriate training programme in accordance with current legislation;
- respect the right to freedom of trade unions or membership of trade unions by its employees, not discriminating against trade union representatives and promoting collective bargaining;
- do not exceed the weekly hours provided for by the National Collective Labour Agreement ensuring at least one day off per week;



- prohibit any form of discrimination;
- not to use or facilitate corporal punishment, mental or physical coercion and verbal violence against workers;
- ensure that the salary is not lower than the minimum wage established by the National Collective Agreement.

Clients

They are the subjects for whom the products and services provided by our company are designed and manufactured.

The attention that customers increasingly pay to the constant commitment to quality and corporate social responsibility is considered fundamental, values to which the market recognizes ever greater importance.

Institutional bodies and associations

This category includes all those entities (ASL, INPS, INAIL, Labor Inspectorate, Municipality of Florence, Region, ARPAT, Fire Brigade, trade unions, credit institutes and other financing bodies) which come into contact with the company and with whom LUBE Srl can develop a fruitful working relationship, considering them important subjects interested in the growth, on their territory, of a company strongly devoted to technological and social development.

Full compliance with current legislation, maximum management and procedure transparency, willingness to collaborate are the fundamental guidelines for carrying out company activities.

Certification bodies

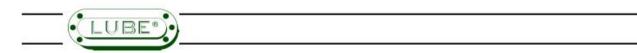
To obtain the certification of its social responsibility system, LUBE Srl has chosen Rina Services S.P.A and Ente Centrocot.

Through the drafting of the Social and Environmental Responsibility Report, LUBE wants to put all stakeholders in a position to evaluate the company's performance from a social point of view in the light of the objectives and planned actions.

Regarding the forms of communication of the principles, including ethical ones, of its management system LUBE makes use of:

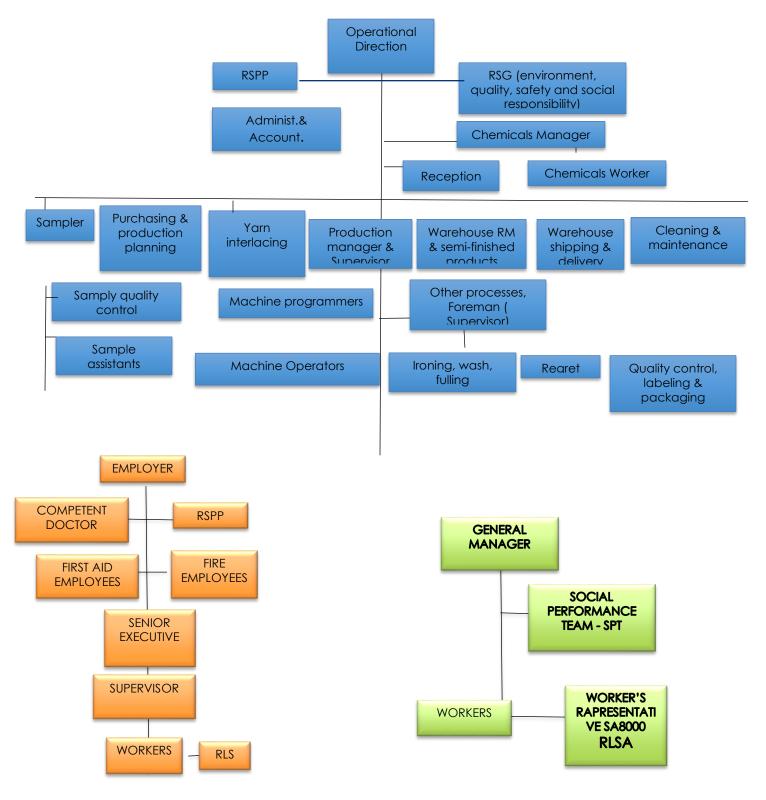
- website: <u>www.lubesrl.it</u>
- dissemination of disclosure documentation to customers and suppliers
- e-mail service for communications to external stakeholders;
- company bulletin boards;
- 1 suggestion and complaint box located near the stamping area;
- meetings and calls for internal communications to its staff.





6. Organizational structure

The internal organizational structure of LUBE Srl is defined in the organization chart below





7. Responsible management of the business

Our company in recent years has had an increase in turnover and a steady growth in the number of customers compared to the previous year.

Below is the increase compared to the previous year.

Indicators	2018	2019	2020	2021
REVENUE GROWTH	3%	1%	-29%	+42%
GROWTH NUMBER OF CUSTOMERS	16%	13%	0%	Constant

8. The value of people

Our company has always focused on the strength of a product of excellence, skilfully calculated yarn knitwear, with solutions that reveal the preciousness of the compositions, unexpected color effects and a lightness taken to extremes. To achieve levels of excellence in our productions, we are aware that the people who work with us represent a value to be protected, precisely because they have experience and expertise that is difficult to find on the market.

Our work is based on the following values that we always place at the center of our activities and our business.

8.1 Child labour ban

2021 GOALS

We intend to continue the work of raising awareness and monitoring suppliers against child labour.

Participation in voluntary initiatives in support of children with the provision of a contribution to associations that support disadvantaged children.

LUBE Srl undertakes not to employ workers whose age falls within the definition of child and young worker.

However, the company has drawn up a



specific procedure, P04 "Procedure against child labour" in which it identifies the interventions to be implemented in the event that the presence of a minor worker is ascertained within the company or in the chain of suppliers and/or sub-suppliers.

However, it is the company's custom to hire only adult personnel and to ensure that, even erroneously, recruitment practices are carried out or initiated that do not comply with the conditions and regulations relating to the employee's age, it is requested by the company, at the time of recruitment, copy of an identity document in compliance with the provisions of the European Regulation on the processing of personal data GDPR679/2016.

Our goals achieved

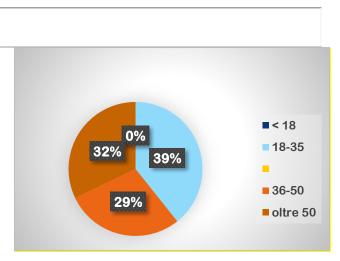
2021 Goal	Indicators	Resources and responsibility	Time	Results
Supplier awareness and supply chain monitoring	Declaration of commitment signed by suppliers	General Direction	31-12-2021	No supplier critical of this requirement



The average age of the staff is about 40 years. Below is the composition of the workforce by age group on 1 January 2020.

COMPOSITION OF WORKERS BY AGE

< 18	0
18-35	11
36-50	8
Over 50	9



As can be seen from the table above, the highest age group is between 18 and 35; as Lube relies heavily on the training of young personnel to work alongside the historical personnel who have now been present in the company for years so as to be able to pass on to them the business skills necessary to grow and be able to replace colleagues very well during the generation change.

8.2 Forced labour ban

2021 GOALS

We work for the continuous improvement of the relational aspects of the relations between workers through the continuous monitoring of the satisfaction of the workers and the management of eventual signallings.

We provide continuous awareness of these issues.

The work carried out by all the personnel employed in company is absolutely voluntary, no one is the victim of other intimidations which force them in any way to lend services.



the threats or their

Our company applies the rules established by the legislation in force and by the C.C.N.L. for all its personnel. of reference. Any form of undeclared work, illegal employment or employment relationship in violation of the law is rejected.

At the start of the employment relationship, the responsible departments require the worker to provide the documentation necessary for ordinary fulfillment (identity card, tax code, family status, residence permit, bank details, tax deduction form, form for TFR destination, application for family unit allowance, etc.) and keeps only one copy in full compliance with European Regulation 679:2016 (GDPR). In fact, the staff is provided with detailed information on the purposes and methods of processing personal data.

The administrative office, which also deals with personnel management together with an external consultant, is available at any time to provide information and explanations regarding the employment relationship, pay slips and the CCNL applied and allows you to directly consult the contents.

Within LUBE Srl each worker is fully aware of their rights and duties; during the personnel selection phase, the same is informed about the tasks, the type of contract, the classification and any difficulties related



to this task. At the time of hiring, workers receive a signed copy of the employment contract, are instructed on how to read the pay slip and are informed on how to withdraw as provided for by the CCNL applied.

In the company there are no security guards or audio-visual systems for the control of the workers and they are free to leave at the end of the working shift. The video surveillance system is installed in compliance with the legal requirements and for the exclusive purposes of guaranteeing security. In compliance with the provisions of the binding and contractual legislation on the matter, we provide

advances on the severance pay in the cases granted and when this request is formally executed, but we never use cash loans to "bind" employees.

Our goals achieved

2021 goal	Indicators	Resources and responsibility	Time	Results
Continuous improvement of working conditions	Number of alerts (if any)	RSG	31-12-2021	No complaints/reports
Raise workers' awareness of the SA8000 standard	Meetings with the SPT and training and awareness meetings	RSG	31-12-2021	During 2021 meetings were held with the SPT and meetings with staff on the SA8000 standard

8.3 Freedom of association and right to collective bargaining

2021 GOALS

We will continue to raise staff awareness of issues relating to the employment contract $$^{\rm Our}$$

company respects the right of all personnel to freely join trade unions and the right to collective bargaining in full compliance with current legislation on the subject and the C.C.N.L. and the prevention of any form of discrimination against union members or representatives.

In the event that union representatives are elected, they will not be subject to any type of discrimination and will be able to communicate freely with workers in the workplace. Company spaces are available for trade



union communications and for any trade union meetings. To date, only one worker is registered with trade union associations.



8.4 Health & Safety

2021 GOALS

We are working to expand the plant and improve the lighting system in production and the ergonomics of the workplaces.

We are creating new spaces available to staff for breaks, toilets and changing rooms.

We continue to continuously raise staff awareness of correct working procedures in safety.

Our commitment is to ensure safe and healthy workplaces.



To this end, our company undertakes not only to respond to the obligations established by Legislative Decree 81:08 and subsequent amendments, but also to implement continuous projects for the improvement of safety.

We are in the process of updating the general risk assessment document and the chemical risk assessment, with a careful analysis of all the activities carried out within the places where the work is carried out, analysing the risks and danger factors for the safety and health of the personnel and identifying the relative preventive and protective measures and the corrective actions to be carried out.

We work with our consultants and with our RSPP to ensure that workplaces always comply with the hygienic-sanitary conditions required by the regulations and ensuring adequate environmental conditions for personnel to carry out their duties.

From 2019, the Employer has decided to appoint an external RSPP, a qualified professional supported by the consultancy firm in charge of managing all the obligations on the subject in order to guarantee maximum attention even with external professionals in such matters.

On an annual basis, a Periodic Meeting is held in the presence of the RLS, the MC and the RSPP in which the health report of the Competent Doctor is analysed, the observations of the RSPP and the RLS and the evolution of the improvement plan planning the objectives for the future.

The company ensures the detection and monitoring of accidents and occupational diseases in order to activate appropriate corrective and improvement actions and ensures its employees basic, specific and periodic information and training relating to the risks present.

A register of accidents and near misses is also envisaged in order to preventively monitor actions and situations that could be a source of accidents.

nere have been no occupational alseases in the last 3 years, there was only one injury in 2021						
INJURIES						
YEAR	Injuries < 3 gg.	Injuries > 3 gg.				
2019	/	/				
2020	/	/				
2021	/	2				

There have been no occupational diseases in the last 3 years, there was only one injury in 2021

Turne of injuries		YEARS			
Type of injuries	2019	2020	2021		
Fractures	-	-	1		
Wounds	-	-	-		
Distortions	-	-	-		
Muscle problems	-	-	-		
Trauma	-	-	-		

Social and Environmental Responsibility report Year 2021



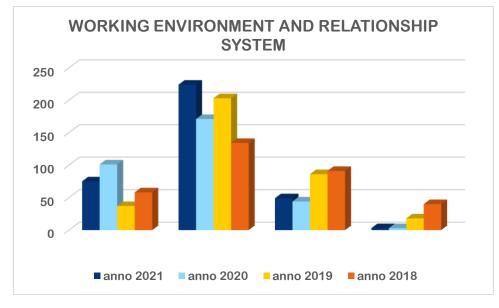
Bruises	-	-	1
Others	-	-	-

The absence of occupational diseases is closely linked to prevention and awareness-raising activities, and also to the organisation of training courses and the purchase and distribution of personal protective equipment delivered to workers.

Below is a summary of the safety training provided in 2021

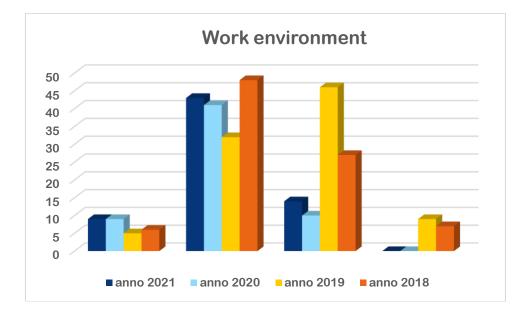
Total hours	Recipients	
16	Employees and workers	
24	First aid workers	
24	Fire-prevention officers	
8	Representative of workers for safety	
	hours 16 24	

In January 2022, a climate survey was carried out for staff. The findings on health and safety aspects are set out below.



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Our achieved goals

2021 goals	Indicators	Resources and responsibility	Times	Results
Training and updates for workers	n. total hours of training	RSG	31.12.2021	The staff is trained in health and safety (to complete training for new recruits)
2 injuries	Injury frequency rate and injury severity rate	RSPP	31-12-2021	1 injury not due to the company but due to a degenerative disease of the employee and the other in transit while returning from the lunch break and 0 occupational diseases

8.5 Collaborators

The human factor and the experience of our collaborators represent the strengths of our company and the element that has allowed us to continue to grow throughout these years of activity.

For this reason, in LUBE srl, the enhancement of the individual and the protection of equal opportunities begins with the recruitment process, to then continue along the path of individual growth thanks to constant investments in training. Our policies help to create an environment in which each employee can find an effective response to their particular needs both in terms of family management and mental and physical well-being.

8.6 Staff selection and turnover

Personnel selection and management policies are defined on the basis of principles and practices defined by the General Management. As indicated in its policies and in the Code of Conduct, the selection of personnel to be hired is carried out by the competent functions and takes place in compliance with the corporate values, the ethical principles of the Code and all applicable laws, both at European and national level. Personnel selection and management are based exclusively on criteria of competence and merit and are carried out in compliance with people's rights, condemning all forms of discrimination.



In application of the principles and values contained in the Code of Conduct, LUBE srl has its own personnel selection policy. In line with the principle of valuing talents and skills and in the face of a job request or a need to manage turnover, a search is first of all carried out through external selection channels such as advertisements on specialized sites, direct deposits or examination from the CV database.

Every new hire has an established induction path. At the end of the induction process, an assessment of the process is carried out, which normally coincides with the end of the contractual trial period.

8.7 Training and skills development

Lube Srl implements personnel development and training methods. On an annual basis, the LUBE Srl General Management in collaboration with the responsible functions carries out an analysis of training needs in various areas. Managers report the training needs of the staff, sharing them with the Management.

From the collection, the training plan is created and issued. Where possible, training is financed through recourse to company funds. The training plan implements courses aimed at continuous updating and at accompanying role or organizational changes. The plan envisages specific moments for the introduction of new resources who, through courses and on-the-job training, help and facilitate the handover. All internal SA8000 and Health and Safety training courses are subject to an assessment at the end of the event.

The training activities carried out by LUBE during 2021 are shown below:

- Work procedures and company rules
- Application of the Covid-19 Protocol and new legal obligations
- Analysis and discussion on organizational aspects and management of employment relationships
- Quality training
- Training on new Stoll machinery
- Training on the new accounting program
- Training and insights into the SA8000:2014 standard.

Furthermore, since 2019 LUBE has started and continues some agreements with educational institutions and has started internship courses within it.

8.8 The well-being of employees

Our company carries out periodic monitoring of personnel satisfaction through climate surveys in order to evaluate all aspects, including relational ones, and to intervene with improvement actions.

Our primary objective in the field of labor relations is to combat any type of discrimination.

8.9 Fight against discrimination

2021GOALS

- Maintaining the existing situation of nondiscrimination
- Periodic monitoring of staff satisfaction also through survey questionnaires



We fight any type of personnel discrimination in hiring, salaries, access to training, career promotions, termination of employment or retirement, based on issues of ethnicity, territorial or social affiliation, nationality, religion, disability, gender, sexual preferences, family responsibilities, trade union membership, political opinions and age or any other condition that could give rise to discrimination;

In order to ensure that no discrimination is made, we undertake to:



- carry out the selection of personnel considering objective elements such as experience, skill, professionalism, education in relation to the functions to be held;
- pay each employee according to the duties performed in accordance with the CCNL;
- carry out the level promotions according to the capacity of the individual and the organizational needs of the company;
- to train everyone according to organisational and development needs, the possibilities for individual participation and the opportunities for employee growth;
- make retirements according to current rules;
- make dismissals in cases permitted by law and in no case on discriminatory grounds.

In order to prevent any form of discrimination at work, we have set up an anonymous complaints mechanism (alert box) which allows workers to register any discrimination suffered, and the company to put in place all necessary measures to prevent the recurrence of the event. At the moment this tool has never been used by workers.

The table below shows the roles held within our organization. There is an equal distribution between female and male personnel. In addition to the three directors of the Company, at the moment there are no employees who hold the role of Executive and Manager.

Levels by gender year 2021

Level	Man	Woman
Manager	0	0
Quadri	0	0
Employees	1	5
Workers	13	7

Workforce composition by type of contract for the year 2021

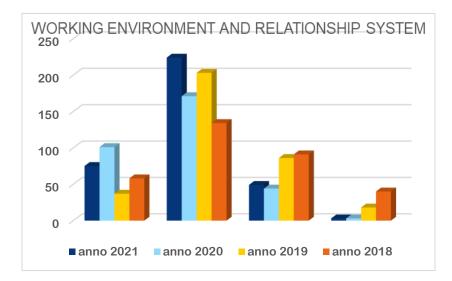
Type of contract	Man	Woman
T. I	13	11
T. D	1	
Others		1

Our goals achieved

2021 goals	Indicators	Resources and responsibility	Times	Results
Maintaining the existing situation of absence of discrimination	Number of complaints/repor ts	SA8000 workers representative	31-12-2021	Analysis of company climate questionnaires



The results of the workers' climate survey carried out in January 2022 are shown below, compared with previous years



8.10 Disciplinary practices

2021 goals

- Maintenance of the absence of disciplinary sanctions
- Continuous awareness of staff on the correct behaviour to keep at work



We have always fought against any form of

coercion,

including verbal ones, towards personnel and we believe dialogue and a constructive approach to solving problems in line with our ethics and corporate culture are fundamental.

Our organization has never made use of the tools provided by the CCNL for disciplinary procedures against personnel even if we believe that they can be effective tools if the need arises.

To take preventive action in this area we have issued a Company Regulation in compliance with art. 2106 c.c., art. 7 of the Workers' Statute and the applicable CCNL.

The company regulations are signed by the staff at the time of recruitment in order to share the obligations and rights of workers while defining the company rules.

No disciplinary action has been taken against employees during the last three years.

Disciplinary actions	2019	2020	2021
Written reminders	0	0	0
Fines	0	0	0
Suspensions	0	0	0

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Dismissal	0	0	0
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Our goals achieved

2021 goals	Indicators	Resources and	Times	Results
		responsibility		
Awareness raising and information to personnel on the correct behaviour to adopt at work	Absence of disciplinary procedures against personnel	SA8000 workers' representative and General Management	31-12-2021	In 2021, meetings were held with staff to continuously raise awareness of company rules

8.11 Working hours and salary

2021goals

 Monthly monitoring of overtime hours performed by staff in order to ensure compliance with the legal limits and the requirements of the SA8000 standard





 More information and training for workers on the composition of pay slips



We strictly comply with the provisions of the CCNL

regarding working

hours and pay and the workers have been duly informed of the expected working hours and contractual conditions.

In correspondence with periods of production peaks, workers can work overtime, duly paid. In any case, the company guarantees that overtime work does not in any case exceed the provisions of the relevant CCNL.

Any changes to the distribution of hours throughout the week are agreed with the workers, as are the planning of holidays, leave and permits.

Holidays are agreed between the employer and the employee taking into account the needs of both. The procedure to be followed for requesting holidays and permits is explained in detail in the company regulations.

YEAR	OVERTIME HOURS	TOTAL HOURS WORKED
2020	30	2076
2021	1272	52.432

Our goals achieved

2021 Goal	Indicators	Resources and	Times	Results
		responsibility		



Control the use of overtime work	Not exceeding the legal limits established by the reference CCNL	General direction	31-12-2021	monitoring of the number of overtime hours. Overtime is only done extremely occasionally
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Our company applies the C.C.N.L. regulations for all employees. guaranteeing everyone fair and dignified salaries according to their abilities and according to their level.

The contractual form most used in the company is the open-ended and fixed-term full-time contract. The company does not have project contracts while some temporary workers work in the company.

We undertake every day to guarantee our employees all the guarantees regarding family allowances, deductions and other forms of integration to the minimum income set at the time of the contract national collective and providing, if necessary, to provide advances and loans to its workers and we are available to personnel, through the personnel administration office or directly the labor consultant, for any clarification regarding payroll.

We inform each employee, at the time of delivery of the first slip, on the main elements that make up the pay slip in order to ensure correct understanding.

In 2019 we provided a training course on correct reading of pay slips.

Our goals achieved

2021 Goal	Indicators	Resources and responsibility	Times	Results
Punctual monitoring of the levels and tasks assigned to personnel	Compliance with the provisions of the applicable CCNL	General direction	31-12-2021	Detailed analysis of the tasks and the new definition of the company organization chart and contractual levels

9. Communicating is the key to sharing

Internal communication becomes a fundamental tool to ensure harmony among all employees with principles, values and objectives.

We are working to encourage both button-up and top-down communication through periodic meetings with job representatives thanks also to the establishment of the Social Performance Team, a body set up following the SA8000 certification which plays an important role in our company for comparison, exchange and reporting to the Management of the problems and proposed by the staff.

In 2019 we consolidated the role of the department head and we saw a significant improvement in the transfer of information and internal communication flows.

Another important aspect is represented by external communication with our stakeholders. For this reason, Lube has revolutionized its corporate website by modifying it "entirely" precisely to allow a quick and safe understanding by the stakeholders.



10. A complete management to guarantee quality

10.1 Control of the supply chain

The quality of a product begins with the raw materials. For this reason, LUBE Srl establishes consolidated relationships with leading companies in the market for the supply of yarns.

The selection of suppliers and the management of the supply chain represents an opportunity to generate new value in the complex textile-fashion supply chain, guaranteeing an optimal level of service and full customer satisfaction through an end-to-end supply chain model. From 2019 we began to share with our suppliers new General Conditions of Supply including the Code of Ethics and the commitment to respect our values. The reliability of the suppliers and their ability to meet the requirements are fundamental elements in order to be able to guarantee the quality of the products and services offered. Wishing to enhance sustainability in relations with suppliers, we have already been working since 2018 to develop a selection procedure in which, in addition to quality, service and competitiveness criteria, parameters in the field of environmental sustainability and social responsibility are also considered.

In addition, we have issued a procedure on the management of chemicals in order to verify and ensure that the yarns we buy and/or dyeing processes that we have our suppliers perform also comply with current regulations and voluntary standards of greater relevance in the fashion industry. Chemical compliance checks are a crucial factor for us. With regard to the supply of goods and services from critical countries, a procedure was agreed to verify the reliability of the supplier and the quality of the product and activities were launched to deepen the aspects related to social responsibility. Implementation of the SA8000:2014 Social Responsibility Management System our company has carried out a careful assessment of the potential risks of all categories of suppliers, subsequently evaluated individual suppliers by acquiring information and self-certification of compliance with the requirements.

The main categories of suppliers and the relative criticality regarding the aspects of social and environmental responsibility are outlined below.

Supply category	Social risk/environmental sustainability	Risk of supply conformity	Chemical safety risk of the product
Suppliers of raw materials (yarns)	Medium	High	High
Analysis laboratories	Medium	High	High
External processing (dyeing)	Medium	High	High
Employment agencies	High	Low	N. A
Various consultancy services (e.g., professional and IT)	Medium	Low	N. A
Couriers	Medium	High	Low
Suppliers of equipment and machines	Medium	High	N. A
Infrastructure, plant and machinery maintenance	High	Medium	Low



11. A commitment to advanced certification standards

of organic farming and we intend to continue along this path.

In line with the strategic decision to develop an integrated management system that ensures total control of all aspects related to its business processes and contributes to their consolidation, our company has undertaken since 2018 a path that led it to achieve the SA8000:2014 certification and in 2020 first the step certification By OEKO TEX and then UNI EN ISO 9001:2015. Among the next objectives there is certainly the process for obtaining the Gots certification, Lube has begun to open up to the market of natural fibers



SA8000:2014 Certification

Sistema di gestione della responsabilità sociale SA 8000

During 2021 LUBE SRL consolidated the SA8000 certified Social Responsibility system in full compliance with regional, national and international human rights laws as well as with the SA8000:2014 standard which includes:

• Company organization chart and job description which provide for the division of roles and responsibilities;

- The social responsibility policy;
- The procedures developed in order to provide a detailed and documented description of the methods of carrying out the activities that must be carried out for the purposes of compliance with the SA 8000 standard;
- Company regulations;
- Records that give evidence that the system is correctly managed (non-compliance, corrective actions, complaints, supplier monitoring plan, etc);
- Risk assessment extended to all regulatory requirements, identifying the aspects that most likely involve risks of violation of these requirements and/or loss of social responsibility performance.

Social Responsibility Policy

The Management has drawn up a document containing the Social Responsibility Policy, so that its desire to create products that ensure the satisfaction of its customers and the company's economic result is made clear, but in compliance with the requirements of the SA8000 standard and collective well-being. The social responsibility policy has been disseminated to workers and all stakeholders and is available by clicking on the website <u>www.lubesrl.it</u>

Representatives of LUBE Srl

The General Management of LUBE SRL has appointed a member of the company management as manager of the management system, while the staff has proceeded to appoint a representative of the SA8000 workers elected by vote by the workers with the commitment to interface with the Management with regard to issues related to social responsibility. During 2021, 2 meetings were held with the SPT. The team includes a balanced representation of members of management and SA8000 worker representatives (RLSA8000 and RLS).

Planning and implementation

In the drafting and/or updating of documents, all existing legal provisions applicable to our organization are taken into account; in the rare cases in which two legal prescriptions deal with the same topic and provide different prescriptions, we have always considered the one more restrictive for the company and more in favor of the staff.

The Social Performance Team also implements the following activities:

- Prepare the risk assessment on the various points of the standard;
- Carry out periodic meetings between representatives and staff;
- Facilitate the performance of the audits by verifying the results and promoting any requests for Corrective Actions and improvements.



Internal and external audits

As part of the social Accountability System, to examine the adequacy of the activities to the requirements of the SA8000 standard, internal audits, monitoring activities are carried out by LUBE Srl

aimed at ensuring the suitability of the system itself.

The SPT effectively monitors activities in the workplace to monitor compliance with the standard, the implementation of planned actions to address the risks identified by the SPT and the effectiveness of the methods adopted to meet the organization's policies and requirements of the standard.

During 2021, internal audits were carried out by our consultant Miss. Valentina Poli of the consulting company TRECON Srl in order to assess compliance with the SA8000 standard. During the audit, some findings on health and safety emerged, LUBE Srl promptly took charge of the findings by opening appropriate corrective actions.

During 2021, the certification body RINA carried out 2 audits, in which some recommendations emerged that were promptly managed and implemented by the organization.

Staff and training

Through training and information, personnel are involved in the requirements of the SA8000 standard, in the objectives and policy of the Social Accountability Management System.

The managers are supported by specialist consultants who provide training and ideas for the implementation of the system. Appropriate training sessions were held for all employees in which participation and sharing of social responsibility objectives were sought.

For the year 2021 a detailed training plan has been issued for all staff.

Management review and external communication

The management, in collaboration with the Social Accountability System Manager, reviews the management system at least once a year in order to verify its adequacy, appropriateness and continued effectiveness of the company policy, procedures and results in compliance with the requirements of the standard and other requirements subscribed by the company.

To facilitate the review, a series of significant and relevant indicators have been defined, able to highlight the achievement of the objectives set and the definition of further objectives. The positions and interests of the workers are defended by the SA8000 representative who plays a valuable role of mediation between the needs of the workers and the company management.

LUBE Srl undertakes to disclose to interested parties information regarding its Social Responsibility Policy and the SA8000 Report; for this purpose, the company has chosen the corporate website www.lubsrl.it as a communication tool with all interested parties and in particular with customers, suppliers and the Public Administrations. Following the achievement of the Step by Oekotex and Iso9001 certification, Lube decided to carry out an SA8000 management review, integrated quality and environment.

Problems and corrective actions

LUBE SrI has established a written procedure for the management of complaints and reports for the management of non-compliance and complaints and has activated a complaint collection and management system that allows workers and interested parties to report any situations that do not comply with the SA8000.

The workers were informed of the possibility of submitting complaints in various ways:

- Anonymously using the communication box;
- Through its SA8000 representative;
- Directly to the Management;
- Directly to the certification body.

LUBE Srl does not apply disciplinary actions, dismissals or in any way discriminates against personnel or interested parties who have provided information on SA8000 compliance or who have filed complaints at the workplace.

Access to verification and recording

LUBE Srl is available to provide information and allow access to interested parties to verify the actual compliance with \$A8000 requirements. The administrative office, upon appointment, is able to illustrate



the functioning of the system to the interested parties and to carry out a visit to the production site. The company has asked its suppliers for the same willingness to provide information and access to interested parties.

To date, we have not received requests for stakeholder access to verify effective compliance with SA8000 requirements or explicit requests from our customers regarding compliance with SA8000.

STeP by OEKO-TEX® Certification

In 2020, our organization obtained the important STeP by OEKO-TEX® certification.

The prerequisite for the STeP certification is the regard of certain minimum requirements in the individual business areas. In particular, our company has regulated the

following aspects through effective control and management procedures:

- Chemical management
- Environmental performance and monitoring of environmental compliance
- Implementation of an environmental management system
- Principles of social responsibility already regulated by the SA8000 standard
- Quality system management and production process control requirements
- Health and safety requirements.



UNI EN ISO 9001 CERTIFICATION

Our organization has defined and is implementing a UNI EN ISO 9001 quality management system through a system of procedures aimed at guaranteeing the controlled execution of internal processes from activities aimed at customers (commercial processes), purchases and all Work. IN SEPTEMBER 2020 Lube obtained the ISO 9001 certification.

12. User safety always in the forefront

In the textile sector, user safety is primarily linked to product compliance with environmental and chemical regulations. In this context, the primary policy of LUBE Srl for consumer protection is represented by the guarantee that all products are in line with environmental and chemical compliance regulations: quality control and product safety, constant request for compliance from its suppliers - materials raw materials, processes and chemical products – and analytical checks carried out in accredited external laboratories. In this regard, in the reporting year, there were no cases of non-compliance with regulations and voluntary codes concerning the impacts on the health and safety of products during their life cycle.

13. The commitment to the environment





LUBE Srl has launched a research process for materials, products and new processes that can guarantee greater respect for the environment. Our choice is in line with the requests of our customers and moves in harmony with the certifications that LUBE has acquired and is acquiring, paying ever greater attention in the production phases to minimizing the environmental impact.

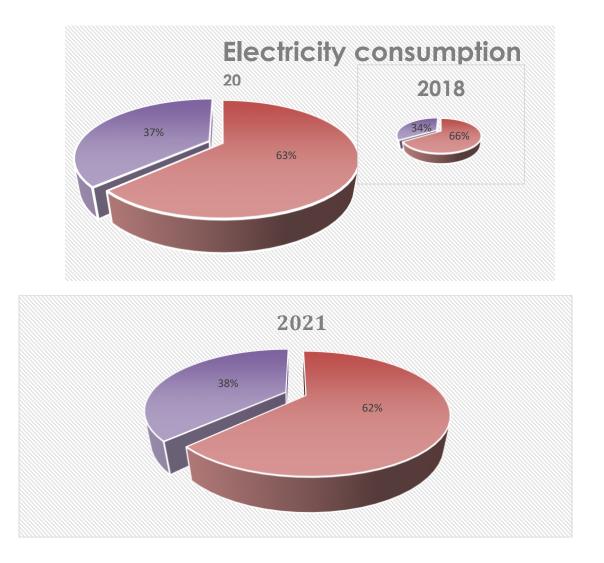
In particular, in carrying out its business, as already highlighted in the principles of the Code of Ethics, LUBE Srl undertakes to promote environmental

protection and guarantee the environmental sustainability of its activities. The process involves raising the awareness of those who come into contact with LUBE, for the management and reduction of the environmental impacts associated with the use of energy and water resources and waste management. The environmental policies of LUBE SrI aim to direct company processes towards solutions of greater environmental protection and reduction of consumption with a view to sustainable development. Environmental policies promote the following actions:

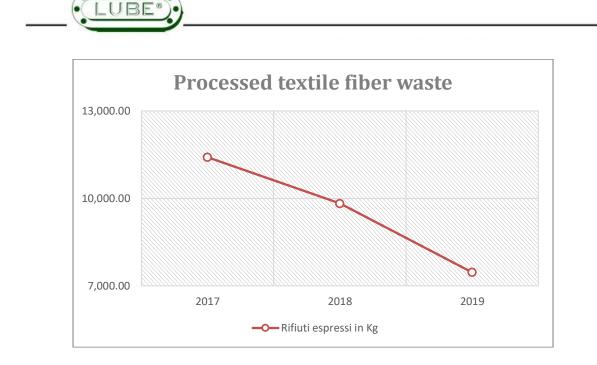
- Select and use equipment, resources, materials and substances rationally, taking into consideration their impact on the environment and their potential risks for health and safety, in particular mechanical, chemical and manual handling risks;
- Prefer the use of technologies, products and services with a lower environmental impact whenever available;
- Operate according to a circular economy logic by limiting the use of natural resources and the production of waste for the benefit of the reused and/or recovery of materials;
- Select suppliers/subcontractors, based on their ability to supply goods and services that comply with the requirements and in compliance with the principles of the management system;
- Promote the growth of the organization and direct company processes towards solutions for greater environmental protection, reduction of energy and water consumption, reduction of waste products and responsible waste management;
- Develop and extend employee information, communication and training processes in order to raise awareness of environmental sustainability and promote dialogue with internal and external interested parties, to ensure efficient and effective application of the company management system;
- Develop and update risk assessment criteria for occupational health and safety and for the environment and procedures for managing emergency situations.

Investments in 2019 led to the optimization of LUBE Srl's production processes by focusing on energy saving and consumption monitoring objectives. As shown in the graphs below, the consumption of electricity from the national grid has decreased over time, in favor of a consumption of electricity from renewable sources of the photovoltaic system. The 2020 data has not been included as it was distorted by the forced closures due to the Covid-19 emergency.

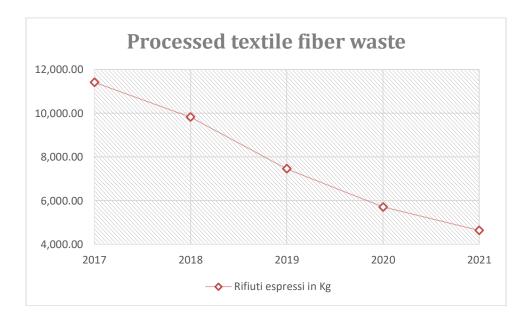




With regard to the production of waste from processed textile fibers, the company is committed to the continuous search for ever more performing machinery, aimed at reducing waste and non-compliant products, managing, in the last three years, to decrease by over 30% the amount of waste produced.



In 2020 a new machinery was introduced for the recovery of yarns from non-compliant products. This has led to a reduction in this figure.





Environmental goals and programs

Our organization is constantly working on specific environmental objectives, in particular our results already achieved in 2020 are the following:

2021-2022 goals	Indicators	Programs/activities	Results
Reduction of product consumption for washing	Reducing the consumption of chemicals	Introduction of a softener system through a mechanical methodology of polystyrene spheres.	Achieved
Consumption of washing chemicals	Reducing the consumption of chemicals	In-depth analysis of washing recipes by type of item in order to reduce the consumption of detergents and softeners	Achieved
Water consumption for product washing	Reduction of water consumption	In-depth study of the washing cycles envisaged by the individual recipes in order to reduce the amount of water.	Achieved
Waste reduction	Reduction of waste from textile fibers	Installation of a winder, a machine for recovering yarns from defective products.	Achieved
Waste reduction	Reduction of waste from textile fibers	Installation of new yarn coupling machines to reduce the presence of knots and consequent NCs	Achieved

ENVIRONMENTAL GOALS: 2022

- Reduction of the environmental impact through the purchase of recycled and certified yarns.
- Reduction of water consumption for production by 5% compared to 2021 through the introduction of a machine that recycles washing water