



## POLICY

### HUMAN RIGHTS AND WORKING CONDITIONS

Top Management, considering the context in which the Company operates, its economic, environmental, and social impacts, guided by the principles articulated in its **integrity code** concerning **human rights and working conditions**, establishes and promotes the following objectives and related actions:

- Comply with applicable laws and obligations;
- **Child Labour and Young Workers:** to observe the minimum employment age in their business activities and throughout their supply chain in accordance with the ILO Minimum Age Convention and shall ensure that child labour is not tolerated in any form;
- **Wages and Benefits:** to provide their workers with remuneration in accordance with applicable regulations and prevailing industry practices; such remuneration should be adequate to cover basic needs and enable a decent standard of living for the workers and their families, which includes respecting minimum wages, overtime compensation, medical leave and government-mandated benefits;
- **Working Hours:** to comply with local laws and collective bargaining agreements (where applicable) regarding working hours, or with the ILO Standards on Working Time in the absence of relevant local regulations.
- **Modern Slavery:** to prohibit any forms of forced, bonded or compulsory labour, including human trafficking;
- **Ethical Recruiting:** not mislead or defraud potential workers about the nature of the work, ask workers to pay recruitment fees, and/or confiscate, destroy, conceal, and/or deny access to worker passports and other government-issued identity documents. Workers must receive a written contract or employment notification at the start of their recruitment in a language well understood by them, stating in a truthful, clear manner their rights and responsibilities;
- **Training and career development:** to adopt continuous training paths and evaluation methods aimed to make workers reach their full potential;
- **Freedom of Association and Collective Bargaining:** to allow workers to communicate openly with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment. Companies should respect worker rights to associate freely, to join or not join labour unions, bargain collectively, seek representation and join workers' councils;
- **Non-Discrimination and Harassment:** not tolerate any form of discrimination or harassment in respect of employment and occupation and should provide equal employment opportunities regardless of worker or applicant characteristics such as age, gender, sexual orientation, gender identity, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union association, covered veteran status, genetic information, or marital status. These principles should also be applied to subcontractors working on the company's premises;
- **Women's Rights:** to provide equal opportunity in employment and equal pay for equal work;
- **Diversity, Equity, and Inclusion:** to prevent discrimination and physical, psychological and verbal abuse in the work environment and to foster and promote inclusive cultures where diversity is valued, allowing everyone to contribute fully and reach their maximum potential. These principles should also be applied to subcontractors working on the company's premises;
- **Rights of Minorities and Indigenous Peoples:** to respect the rights of local communities to decent living conditions, education, employment, social activities;

The Company commits to disseminating the directions and objectives outlined in this policy to all people within the organization, including its suppliers, subcontractors, and business partners. This commitment extends to any other subject who acts in any capacity, in name and/or on behalf of the company.

27 November 2023

  
ALESSANDRO STRADA  
Group CEO