

# HUMAN RIGHTS POLICY

## 1. PREMISE

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This Human Rights Policy (hereinafter also referred to as the "Policy") was adopted on 10/09/2024 by the Chiorino Group (hereinafter also briefly referred to as "Chiorino" or the "Group") through its approval by the Board of Directors.

Chiorino's Code of Ethics is deeply inspired by the United Nations' guiding principles on human rights. These principles emphasize the importance of treating every individual with dignity and respect, without discrimination of any kind. For Chiorino, adopting and respecting these principles not only reflects a moral commitment but can also contribute to long-term business success. Respect for human rights fosters an inclusive and respectful work environment, promotes employee trust and loyalty, enhances corporate reputation, and reduces risks related to legal and reputational controversies. In summary, the United Nations' guiding principles represent a crucial moral and strategic compass for companies committed to operating responsibly and promoting the well-being of people and communities in which they operate.

## 2. PURPOSE OF THE DOCUMENT

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This Policy aims to provide a framework of principles and practices regarding Human Rights that Chiorino intends to pursue and considers essential for developing a positive and respectful work environment. This Policy reinforces what is already stated in the Group's Code of Ethics and represents a commitment by Chiorino to promote the protection of human rights in the workplace.

## 3. SCOPE OF APPLICATION

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This Policy applies to all companies within the Group (Chiorino SpA and all Group subsidiaries). Specifically, this Policy is directed at employees of all qualifications and levels, Chiorino collaborators, and generally, all stakeholders with whom the Group has business relationships during its activities and/or who act in the interest of or on behalf of the Group (hereinafter "Recipients"). All Recipients are required to read, understand, and maintain behaviors consistent with the principles and provisions set forth in this document.

## 4. REFERENCES USED

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The Chiorino Group is committed to promoting the principles established by current legislation in the countries where it operates. In defining its principles and commitments and drafting this Policy, Chiorino has considered the following international references:

- The United Nations Universal Declaration of Human Rights of 1948, which establishes the fundamental principle of equality for all individuals, without discrimination of any kind, including gender, ethnic origin, religion, age, sexual orientation, disability, etc.;
- The Declaration on Fundamental Principles and Rights at Work and the ten core conventions of the International Labour Organization (ILO), which promote equality, equal opportunities, and fair treatment in the workplace, including the elimination of discrimination in employment and occupation, equal pay for equal work, and the promotion of a safe and healthy working environment;
- The United Nations Convention on the Elimination of All Forms of Discrimination Against Women, the International Convention on the Elimination of All Forms of Racial Discrimination, the Convention on the Rights of the Child, the Convention on the Rights of Persons with Disabilities, and the Convention on Migrant Workers and Members of Their Families;
- ILO Convention No. 190 of 2019 on the Elimination of Violence and Harassment in the World of Work, which aims to create a harmonious, productive, and collaborative work environment through the prevention and elimination of violence and harassment in the world of work, including violence and harassment based on sex or gender;
- The European Commission Communication to the European Parliament, the Council, the European Economic and Social Committee, and the Committee of the Regions - COM (2021) 142 final of March 24, 2021, concerning the EU Strategy on the Rights of the Child;
- The UN Global Compact Principles, particularly Principles 1 to 6, which promote respect for Human Rights and Labor Rights;

- The UN Guiding Principles on Business and Human Rights (UNGP) and the related Gender Dimensions, which define the duties and responsibilities of States and businesses to “protect, respect, and remedy” through the identification and mitigation of human rights violation risks within business activities. In particular, Chiorino has adhered to the National Action Plan on Business and Human Rights 2021-2026 based on these Guiding Principles;
- The 2030 Agenda for Sustainable Development, whose Goals are closely related to the promotion of diversity, equity, and inclusion, with particular reference to Goal 5 on gender equality, Goal 8 on decent work and economic growth, and Goal 10 on reducing inequalities.

Additionally, the Chiorino Group, in drafting this Policy, has taken into account and incorporated what is stated in its Code of Ethics, approved by the Board of Directors on March 14, 2023, as well as the behavior principles outlined in its Diversity, Equity, and Inclusion (DE&I) Policy.

## **5. CHIORINO'S COMMITMENT TO HUMAN RIGHTS**

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For Chiorino, the commitment to respecting human rights translates into the following behavioral principles:

### **• Non-Discrimination**

Chiorino promotes a work environment where no individual is subject to discrimination based on gender, age, disability, ethnic, social, or geographical origin, union affiliation, language, religion, political or sexual orientation, gender identity, nationality, or marital status, within recruitment, hiring, training, remuneration, rewards, dismissal, and other diversity-related procedures.

### **• Decent Working Conditions**

Chiorino is committed to fostering a work environment that promotes decent, safe, and healthy conditions for all employees, respecting privacy and personal dignity. Additionally, Chiorino does not tolerate any form of harassment or violence in the workplace. The Group ensures fair treatment and compliance with the minimum contractual standards dictated by local regulations for all its employees.

### **• Opposition to Child Labor, Forced Labor, and Human Trafficking**

Chiorino repudiates forced labor, slavery, and human trafficking in all its forms. The Group ensures that its employees work under conditions that are free and voluntary. Furthermore, Chiorino does not tolerate any form of child labor and ensures recruitment processes comply with age minimum laws and regulations in all countries where it operates.

### **• Harassment and Violence in the Workplace**

Chiorino opposes all forms of harassment and violence in the workplace, including those listed below, promoting an inclusive and respectful work environment. Harassment involves unwanted, unreasonable, and offensive behavior towards the person being harassed, creating an intimidating, hostile, or humiliating work environment. Harassment includes, but is not limited to, physical or verbal insults or humiliations, threats or intimidation, unwanted comments regarding ethnicity, age, gender identity, sexual orientation, disability, religion, marital status, and/or family status.

### **• Employee Health and Safety**

The Chiorino Group recognizes the health and safety of workers as priority objectives and promotes the safeguarding of fundamental human rights in all aspects of social coexistence, starting from the right to work in environments and conditions that ensure the health and safety of workers. Chiorino employs all necessary resources to prevent workplace injuries and illnesses, ensuring healthy and safe working conditions while promoting a culture of safety among all workers. The Group is committed to planning and executing all activities to prevent, where possible, and preserve the health and safety of workers, in compliance with applicable local and international regulations.

### **• Social Dialogue**

Social dialogue is fundamental as it promotes mutual understanding, cooperation, and the active participation of all members of the organization. Through open and constructive dialogue, it is possible to proactively address and resolve conflicts, improve efficiency and productivity, and build a respectful and inclusive work environment. Chiorino is committed to promoting social dialogue, firmly believing that an open, respectful, and collaborative communication channel is the foundation for a positive work climate based on respect for human rights.

• **Freedom of Association and Right to Collective Bargaining**

Chiorino recognizes the right of its workers to join trade unions of their choice, to negotiate collectively, and to hold peaceful assemblies, in accordance with applicable legislation. The Group does not discriminate against employees who join unions or against worker representatives. On the contrary, Chiorino acknowledges the important role of trade unions and is committed to fostering open and constructive dialogue between employees and management.

• **Access to Education and Training**

Chiorino ensures access to education and training for all its employees, contributing to their professional and personal development, without any discrimination. The Group is committed to promoting human capital development through the implementation of specific training initiatives aimed at the professional and cultural growth of its employees and those involved in business activities.

• **Support for Local Communities**

Chiorino interacts with the local communities where it operates in a respectful manner, contributing to their well-being and the promotion of human rights at the local level.

• **Supply Chain**

Chiorino promotes the adoption of human rights commitments throughout its supply chain. Additionally, it encourages its suppliers to understand and respect the principles contained within this Policy, the Group's Code of Ethics, and the Supplier Code of Conduct.

## **6. DISSEMINATION AND AWARENESS**

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The Group commits to publish and promote this Policy both internally and externally through the channels listed below.

*Internal channels:* dissemination via the corporate intranet network and display of this Policy on bulletin boards at Group subsidiaries.

*External channels:* publication on the corporate website.

## **7. UPDATING**

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Chiorino ensures regular updating of the Policy through a periodic review process of the document, aimed at ensuring its alignment with cultural, regulatory changes, and the organization's evolving needs.

## **8. REPORTING PROCESS**

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Any behavior that does not comply with the principles outlined in this Policy must be reported to the responsible person in each Group company via the appropriate communication channels specifically established.