



Human Rights Policy





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HUMAN RIGHTS POLICY OF THE EL.EN. GROUP

1. PREMISE

This document was adopted in November 2019¹ but, since its establishment, El.En. and subsequently all its subsidiaries have attached fundamental importance to the respect for and protection of fundamental human rights, indispensable elements for El.En. Group's objective of creating sustainable value for all its stakeholders. Dignity and respect for people have always been at the core of the Group's corporate culture, which constantly strives to ensure that any violations are eliminated internally.

This document was approved by the Board of Directors of the parent company El.En. S.p.A. and was subsequently approved by all Group subsidiaries, translated if necessary into the local languages and sent to all employees. This Policy has been distributed to all Group employees and is made available on the Group's intranet or company notice boards as well as on the corporate website www.elengroup.com in the Governance/Ethics, Integrity and Compliance section.

The Human Rights Policy is intended to regulate the operational activities of the departments involved.

Compliance with the principles contained in this Policy, which is based on the values of El.En. Group and the principles of its Code of Ethics², is to be considered an integral part of the duties of all collaborators³, suppliers and business partners, with particular reference to the conduct of company activities and business, as well as the standards with which stakeholders are expected to comply; the Policy is valid for all Group companies, both in Italy and abroad, and applies regardless of the geographical location of subsidiaries, collaborators, suppliers or business partners.

El.En. Group has assigned the responsibility of analysing impacts and risks on Human Rights to the Control and Risk, Sustainability and Related Parties Committee: a dedicated annual budget has been allocated to this Committee, to make adequate supervision processes for this activity possible.

The Committee also has the task of reviewing this Human Rights Policy and submitting, after consultation with the Sustainability Department, any updates and/or additions to the Board of Directors. With regard to the reporting of violations, please refer to the relevant section below.

El.En. Group respects the fundamental values of International and European Law and applies their founding principles, which can be found, inter alia, in the following documents:

- United Nations (UN) International Bill of Human Rights
- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights

¹ The Sustainability Manager, the Executive Director in charge of the internal control and risk management system and the Control and Risk, Sustainability and Related Parties Committee participated in the drafting of this document.

² The El.En. Group Code of Ethics was approved by the Board of Directors of the parent company El.En. S.p.A. and subsequently approved by all Group subsidiaries, translated if necessary into the local languages and disseminated to all employees. The Code of Ethics is delivered to all new hires and made available to all Group employees on the company intranet and/or notice boards as well as on the corporate website www.elengroup.com. The Code of Ethics applies to all areas and departments of the Group's companies and regulates their operational activities.

³ The term "Collaborators" is used for directors, executives, employees, as well as all those who work with the Group on the basis of a contractual relationship, even on an occasional and temporary basis, at all levels of the organisation.

- Declaration of the International Labour Organisation (ILO) and the Declaration on Fundamental Principles and Rights at Work
- The UN Convention on the Rights of the Child
- The European Convention on Human Rights

The El.En. Group documents related to the principles listed in this Policy are:

- the Code of Ethics;
- Diversity Policy;
- Anti-Corruption Policy;
- Environmental Policy;
- The Organisation and Management Model pursuant to (It.) Legislative Decree no. 231 for those Group companies that have adopted it.

2. OUR COMMITMENT

El.En. Group monitors the application of and compliance with the Human Rights Policy and the Code of Ethics within its corporate organisation and expects all its Collaborators, suppliers and business partners to abide by their rules, commitments and principles and to operate in accordance with the highest ethical standards and in compliance with all applicable laws.

El.En. Group requires its collaborators, suppliers and business partners to undertake to:

- Condemn all forms and types of child labour and not use or support child labour in any way, as defined by the legislation in force in the country where the activity is carried out. In any case, the age must not be below the minimum age stipulated in ILO Convention No. 138.
- Condemn all forms of forced labour and condemn human trafficking, not resort to it and not support it;
- Not use or support any form of discrimination on the basis of gender, age, sexual orientation, religion, social origin or any other condition that could give rise to discrimination in hiring, remuneration, access to training, promotion or termination of employment;
- Ensure a safe workplace by taking all appropriate measures to prevent accidents and injuries;
- Respect workers' right of association and their freedom to join trade unions;
- Respect the right of employees to a decent wage by fulfilling their contracts and in any case by guaranteeing a minimum living wage appropriate to the tasks performed;
- Comply with the laws and industry agreements on working time, never exceeding the maximum permitted working hours and guaranteeing scheduled rest and holidays;

- Respect laws and compliance with internationally recognised standards⁴ in particular in relation to respect for human rights of communities affected by the Group's upstream and downstream operations in the value chain, establishing, where necessary, dialogue, particularly in relation to measures to remedy and/or make it possible to remedy any human rights impacts that may emerge⁵;
- Communicate the commitments undertaken by El.En. Group with regard to respect for human rights, disseminate this Policy and its subsequent amendments, making this document available in shared folders and/or company notice boards, and carrying out training sessions on the subject of human rights, also to explain the measures put in place by El.En. Group to remedy and/or make it possible to remedy any impacts that may arise on the subject of human rights.

3. PROTECTION OF HUMAN RESOURCE

“Human resources represent an indispensable element for the existence and the development of the Group, which considers the professionalism and the commitment of their employees and collaborators essential values for achieving their objectives.

The Group respects and protects the dignity, health, safety and privacy of its employees and collaborators and duly informs them when they are hired and after any modifications in the corporate procedures, in relation to their rights as well as the risks which they might encounter in the performance of their jobs.

In particular, the Group protects the physical and moral integrity of their employees and collaborators by guaranteeing working conditions that respect the individual dignity, in accordance with the present regulations regarding the safety and health of workers.

The Group ensures that there are no acts of violence or psychological coercion nor any attitude or behavior that harms the dignity of the individual”. (*Paragraph 7.1 Ethic Code*).

4. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

El.En. Group protects the right of its collaborators to adequate representation and to freely join trade unions or similar organizations. The Group is committed to establishing and maintaining a constructive dialogue with the employees' elected representatives, with mutual respect and the right to collective bargaining in accordance with local laws as the basis for discussion.

The Group is committed to providing workers' representatives with the necessary resources to draw up effective collective bargaining agreements, if necessary, information on working conditions in a timely manner and a clear view of the company's performance.

The Group also undertakes to seek cooperation with employee representatives in the event of substantial changes that could have a significant effect on worker employment.

5. WAGES AND WORKING HOURS

Within El.En. Group, remuneration is aligned with the local laws of the countries in which we

⁴ UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises, which involve affected communities.

⁵ Reports of any non-compliance cases and the indication of the nature of such cases are made using the reporting methods provided in the following paragraph 11 'Reporting of Violations' or through the supply chain monitoring procedure, which follows the same reporting process.

operate and with market standards. We comply with the applicable laws on wages, benefits, working hours and overtime. El.En. Group considers it essential that the right to health, safety, dignity, rest periods, paid holidays and a maximum number of working hours is guaranteed along its value chain.

6. CHILD AND FORCED LABOR

The The Group rejects the use of child and forced or compulsory labour⁶ and all forms of slavery or human trafficking as defined by ILO Convention No. 29 on Fundamental Principles and Rights at Work. The Group also pays close attention to respect for these issues along the value chain of our activities. The Group rejects the use of child labour, as defined by the legislation in force in the country where the activity is carried out; in any case the age must not be less than the minimum age established by ILO Convention No. 138.

7. IMPARTIALITY AND EQUAL OPPORTUNITY

“One of the fundamental principles for the realisation of a positive working environment is the way all those who work in the Group and with the Group collaborate.

El.En. Group is committed to ensuring a positive, constructive and dynamic working environment that supports the diversity of people and their talents, opinions and views, guaranteeing equal opportunities for all based on the principles of impartiality.

The Group undertakes to avoid any form of discrimination that is based on ethnicity, skin colour, sex, sexual orientation, gender identity, disability, age, one's language, religion, political or philosophical opinions, national ancestry or social background, affiliation with political associations or trade unions as well as any other form of discrimination covered by EU and national law. The Group is also committed to avoiding and condemning any form of verbal or sexual harassment and gender-based violence in the workplace, as this represents a very serious violation of personal rights. This commitment applies to all aspects of the employment relationship, including recruitment, training, job assignment, promotion, transfer and the termination of the working relationship.

This commitment applies to all aspects of the employment relationship, including recruitment, training, job assignment, promotion, transfer and the termination of the working relationship”. (*Paragraph 7.2 Ethic Code*).

8. POSITIVE WORK ENVIRONMENT

“The Group is committed to ensuring a positive and productive working environment for all employees and collaborators, guaranteeing fair treatment of all employees with equal dignity and respect.

Requests or threats to induce people to act against the law, against the Human Rights Policy and against the Code of Ethics are not tolerated; any behaviour that threatens the safety of people or property or that is potentially violent must be reported immediately.

⁶ Forced or compulsory labour shall mean all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily (see Art. 2 para. 1 of ILO Convention No. 29).

The behaviour of each employee and collaborator conforms to the principles of legality, loyalty, correctness, transparency and professionalism expressed by our legislation, as well as compliance with the rules of the Human Rights Policy and of the Code of Ethics, with the legislative and contractual regulations governing the employment relationship with the Group and with company procedures". (Section 7.3 Code of Ethics).

The Group is also committed to employing local resources by always providing the necessary training to improve skill levels, in cooperation with the representatives of employees and, where appropriate, of the relevant government authorities.

Where scientific and technological development activities are carried out in foreign countries, the Group endeavours to meet the needs of the local market, as well as recruit the country's personnel in the field of science and technology, encouraging and supporting their training. When licensing the use of intellectual property rights, the Group undertakes to do so under mutually agreed terms and conditions, in order to prevent and mitigate negative impacts and, consequently, contribute to the long-term sustainable development prospects of the relevant country.

9. PRACTICES FOR A SOUND AND SAFE ENVIRONMENT

"The Group is committed to providing a work environment which is both safe and sound while respecting the natural environment and in compliance with all of the regulations regarding the safety of the workers and the environment.

We are further committed to making sure that all collaborators pay the greatest attention in order to prevent danger and avoid accidents and personal injury, and observe all the regulations regarding safety and health and practices regarding their work and to take all precautions necessary to protect themselves and their collaborators". (paragraph 7.4 Ethic Code).

The Group is actively committed to fostering the personal and organisational well-being of people, promoting risk awareness and responsible behaviour by all, both through the dissemination of a culture oriented towards health, safety and physical and psychological well-being and through training activities and by promoting the use of appropriate PPE.

El.En. Group is committed to spreading and consolidating a culture of safety, promoting responsible behaviour by all collaborators. To this end, the Group is committed to managing the hazards and risks associated with each task and activity, to providing competence and awareness of the risks associated with work environments and tasks to all personnel through continuous training and information, to identifying the best PPE for each task, and to providing and training personnel in its use. All work instructions and procedures relating to health and safety issues are periodically reviewed to make changes and improvements, to adopt rules of good practice in the management of contracts and sub-contracts, to reduce possible risks from interference and to always seek the best available technology for individual and collective protection.

El.En. Group is committed to allocating adequate human and financial resources to the achievement of the goal of significantly reducing accidents and to the objective of constantly improving working conditions.

10. SELECTION OF EMPLOYEES AND COLLABORATORS

"The evaluation of the personnel to be hired must be conducted on the basis of the correspondence between the professional profiles of the candidates and the expectations and requirements of the company, respecting the policy of equal opportunity for all the persons involved.

The information requested is strictly related to the verification of the aspects envisaged by the professional and psychological-aptitude profile while respecting the private life and opinions of the candidate. Within the constraints of the available information, the Group applies all necessary measures to avoid favoritism, nepotism and forms of clientelism during the phases of selection and hiring (for example, by making sure that the interviewer is not a relative of the candidate).

For the stipulation of contracts with the employees and collaborators, the Group acts in conformity with the applicable regulations and the current collective bargaining rules". (paragraph 7.5 Ethic Code).

11. REPORTING AND VIOLATIONS

For the submission of reports and for the procedure for managing them, please refer to the "Whistleblowing Procedure" available on the website www.elengroup.com in the *Governance\report handling/Whistleblowing* section. Since El.En. Group has assigned the responsibility of analysing human rights impacts and risks to the Control and Risk, Sustainability and Related Parties Committee, it will be the duty of the Supervisory Body to inform the Control and Risk, Sustainability and Related Parties Committee of all reports on this issue. The Supervisory Body is entrusted with receiving reports in accordance with the Whistleblowing procedure.

The undertaking has procedures in place to expeditiously, independently and objectively investigate incidents concerning the company's conduct, including cases of human rights violations. El.En. Group guarantees the confidentiality of the sources and information that comes into its possession, without prejudice to legal obligations. The Group does not tolerate any form of retaliation against anyone who makes a report in good faith, nor against anyone who has refused to carry out actions contrary to this document, even if there have been negative consequences for the business as a result of such a refusal.

Therefore, any employee, collaborator or stakeholder who becomes aware of a suspected or known violation of this Policy or of Human Rights laws must immediately report it, even anonymously, through the channels outlined in the Whistleblowing procedure, which currently are:

by e-mail to the following address: odv.elen@gmail.com

to the following postal address: El.En. S.p.A. -c/o Organismo di Vigilanza -via Baldanzese 17, Calenzano (FI), 50041, Italy

The President

Calenzano (FI), January 31st, 2025

Gabriele Clementi

