



Human Rights Policy



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HUMAN RIGHTS POLICY OF THE EL.EN. GROUP

1. GENERAL PRINCIPLES

This document, which was adopted in 2019 and updated in 2022, has the purpose of promoting the respect and safeguarding of the fundamental human rights are an essential part of the Sustainability Policy of the El.En. Group. The dignity and respect of the individual have always been part of the corporate culture and the Group is constantly committed to the elimination of any violation that occurs within the company.

The respect of the principles contained in this Policy, founded on the values of the El.En. Group and on the principles of its Ethics Code, must be considered an integral part of the duties of all of the employees. The Policy applies to all of the companies belonging to the Group, both in Italy and abroad.

The El.En. Group respects the International principles for the promotion and protection of Human Rights recognized in the Global Compact of the United Nations contained in the Universal Declaration of Human Rights and the Declaration of the International Labor Organization (ILO) on the principles and rights of labor.

2. OUR COMMITMENT

The El.En. Group monitors the application and the respect of the Human Rights Policy and the Ethics Code within their corporate boundaries and expects that all of their collaborators¹ and suppliers respect the regulations, the commitment and the principles and that they operate on the basis of the highest ethical standards and in compliance with all of the applicable laws.

If a violation of the Human Rights Policy is found internally or at one of their suppliers, the reason for the violation will be analyzed and a plan of alignment will be defined.

The El.En. Group is committed to, and requires that their collaborators and suppliers also be committed to:

- Condemning every form of child labor and neither using nor sustaining in any way the work of minors;
- Condemning every form of forced labor and neither use it nor sustain it;
- Guaranteeing a safe workplace by adopting all measures suitable for preventing accidents and injuries;
- Respecting the right of the workers to form associations and their freedom to belong to labor unions;
- Not using or sustaining any type of discrimination based on gender, age sexual orientation, religion, social class or any other condition that might create discrimination in the hiring, compensation, access to training, promotion or termination of employment;
- Respecting the right of employees to receive a decent wage, fulfilling the stipulated contracts and, in any case, guaranteeing a minimum living wage appropriate to the duties performed;

¹ “Collaborators” are defined as administrators as well as all those who work with the Group on a contractual basis, even occasional or temporary, at all levels of the organization.

- Comply with the laws and the agreements made for the sector in relation to the working hours, never exceeding the maximum hours allowed, and guaranteeing rest periods and public holidays.

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

The El.En. Group respects the rights of its collaborators to be adequately represented and to adhere freely to labor unions and similar organizations. The Group is committed to establishing and maintaining a constructive dialog with the representatives of the workers who have been elected by the employees, by placing as the basis for the dialog mutual respect and the right to collective bargaining in conformity with local laws.

5. WAGES AND WORKING HOURS

At the El.En. Group wages are aligned with the amounts set by the local laws in the countries in which we operate and by the standards of the market. We respect current regulations regarding wages, benefits, working hours and overtime.

6. CHILD AND FORCED LABOR

The Group rejects the use of child labor or forced labor as defined by the ILO Declaration on the Fundamental Principles and Rights of Labor.

7. IMPARTIALITY AND EQUAL OPPORTUNITY

“One of the fundamental principles for the creation of a positive working environment, is the method of collaboration among all those who work at and with the Group.

The Group is committed to guaranteeing a working environment which is positive, constructive and dynamic and supports diversity of people and their talents, opinions and views by guaranteeing equal opportunity for all on the basis of the principles of impartiality.

The Group is committed to avoiding any form of discrimination on the basis of gender, race, social class, national origin, language, religion, political or philosophical opinions, political party or labor union association, state of health, disability or age.

This commitment is applied to all aspects of the employment including hiring, training, work assignment, promotion, transfers and termination of employment” (*Paragraph 7.2 Ethic Code*).

8. POSITIVE WORK ENVIRONMENT

“The Group is committed to assuring a positive and productive work environment for all of their collaborators by providing equal treatment for all employees with the same dignity and respect. We do not tolerate the use of requests or threats intended to induce people to act against the law, against the Human Rights Policy, or against the Ethics Code; every kind of behavior that threatens the safety of people or property or that is potentially violent should be reported immediately.

The behavior of each employee and collaborator must be in conformity with principles of legality, loyalty, correctness, transparency and professionalism expressed in our statutes, as well as being in respect of the rules of the Human Rights Policy and the Ethics Code, the current legislation and the contracts which govern the relations with the Group and the corporate procedures”. (*Paragraph 7.3 Ethic Code*).

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*).

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

Reporting of violations related to Human Rights is managed in conformity with the Ethics Code of the El.En. Group which contains a specific procedure for reporting of violations.

The President

Calenzano (FI), 14th november 2022

Gabriele Clementi

A handwritten signature in black ink, appearing to be 'G. Clementi', written over a horizontal line.