POLIDORO

Corporate protection policy and protection of human rights

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APPROACH AND COMMITMENT

Respect for human rights and the **promotion of employee welfare** are deeply rooted in the founding values and principles of Polidoro S.p.A.

Polidoro believes in sustainable business development and considers respect for human **rights** and proper adherence to **labour rights an** integral part of **responsible business behaviour**.

Consistent with the provisions of the Code of Ethics, Polidoro recognises people as an indispensable element for the development of the Company and promotes their skills, competences, commitment and creativity, protecting work, health and safety and guaranteeing safe and secure working conditions and an environment, as well as a system of values and principles on legality, transparency and sustainable development.



Acknowledging that human rights issues are vast and complex and require an articulated approach, the objective of this document is to define, structure and develop a **clear approach on the issue and to promote the principles contained in** this policy also through continuous training aimed at Polidoro people and suppliers, with particular attention to health and safety, integrity and business ethics, inclusion and diversity and sustainability issues.



Supervision of the implementation of Polidoro's Human Rights principles is the responsibility of the Working Group, which is committed to the development of corporate sustainability.

This Policy is also subject to the control of the Board of Directors led by the President.



This Policy constitutes a manifesto committing the company to promote the protection of human rights for all persons working in its 'value chain'.

Although Polidoro is headquartered in Italy, where the legal framework regulates respect for fundamental human rights, it also operates in Asia and is committed to respecting and actively disseminating the principles set forth in the regulations and standards issued by international organisations of reference, including:

- The **Universal Declaration of Human Rights** and subsequent international conventions on civil and political rights and on economic, social and cultural rights.
- The Declaration on Fundamental Principles and Rights at Work and the eight Core Conventions of the International Labour Organisation.
- **The UN Conventions** on the Rights of Women, on the Elimination of All Forms of Racial Discrimination, on the Rights of the Child, on the Rights of Persons with Disabilities.
- The **2030 Agenda for** Sustainable Development adopted on 25 September 2015 by the United Nations General Assembly and its 17 Sustainable Development Goals (SDGs).

5 REFERENCES INTERNAL

The following internal documents are relevant to and support the principles stated in our Policy:

- Code of Ethics.
- Policy on Reporting Irregularities (Whistleblowing).
- National collective bargaining agreement for metalworking.
- International frame of reference.
- Policy on combating child labour.

6 OUR COMMITMENTS

Below are the principles adopted by Polidoro with regard to respect for fundamental human rights and basic working conditions:

- **Child labour:** Polidoro does not use any form of child labour, refusing the employment of personnel younger than the minimum age for entry into the world of work required by the law of the country where the work is performed.
- Forced labour: Polidoro rejects all forms of forced or compulsory labour and guarantees working conditions in compliance with the laws and regulations in force. Work, whether ordinary or extraordinary, is free from any form of physical and/or psychological coercion.
- Harassment: Polidoro does not tolerate sexual, personal, or other harassment or offence. Each Addressee respects the personal dignity, privacy and personality rights of any individual and works with women and men of different nationalities, cultures, religions and races.
- Discrimination: Polidoro considers unacceptable any form of discrimination intended as a distinction, exclusion or preference having the effect of denying or altering equality of opportunity or treatment in employment or occupation. It is Polidoro's objective to consolidate a working environment characterised by the absence of racial, cultural, ideological, sexual, physical, moral, religious or other discriminations. For Polidoro, diversity represents a strategic element for the company's competitiveness and the development of its people. The company believes that teams with different skills, experiences and backgrounds enrich the working environment and stimulate creativity, fostering a more effective leadership style and nurturing an increasingly open corporate culture.
- Fair and favourable working conditions: Polidoro guarantees a fair remuneration that complies with the minimum wage requirements provided for by collective agreements and the reference legislation, promoting active policies to prevent and contrast the gender gap and to support the employment of people with disabilities. Polidoro, moreover, aware of the challenges posed by the reconciliation between work and private life and the right to rest and leisure, promotes a fair balance between work and personal sphere, applying flexible working time strategies.
- Freedom of association and collective bargaining: Polidoro recognises the right to free association and collective bargaining and is actively committed to opposing any form of abuse or discrimination against individuals engaged in organising or representing workers.
- Health and safety at work: Polidoro is committed to promoting a corporate culture that guarantees healthy and hygienic working conditions. It also considers the protection of health and safety as fundamental values that characterise the actions of the company as a whole and adopts high standards for the assessment, prevention and management of related risks. The prevention of risks to health and physical integrity is applied in the workplace, in relation to employees, and more generally in Polidoro's activities in relation to all stakeholders.

- **Privacy:** Polidoro is committed to respecting the right to privacy and the protection of the data and personal information of all those involved in its activities, with particular attention to customers and in absolute compliance with the regulations in force.
- Culture and skills: Polidoro is committed to promoting the development of human capital through the implementation of specific training initiatives aimed at the professional and cultural growth of its employees and those involved in the Company's activities.

7ADRESSEES OF POLITICS

This Policy on our Labour and Human Rights position confirms the company's commitment to all employees, suppliers, stakeholders at all levels, partners and all those who, in some way, fall within the scope of our value chain.

8 COMMUNICATION AND TRAINING

The Policy will be **circulated** to all stakeholders, both internal and external, through **appropriate communication initiatives**.

9 APPLICATION OF POLICY

Polidoro personnel are required, without exception, to **adapt their behaviour** to the principles set out in this Policy, both in the workplace and at external work-related events (meetings, social events, travel).

10 REPORTS OF NON COMPLIANCE

Polidoro makes available appropriate reporting channels in order to improve its ability to identify and analyse real, or even just potential, impacts on human rights and promptly take appropriate corrective measures, always taking care to ensure the confidentiality of the reporter's identity from the receipt of the communication and in any subsequent contact. Reports can be forwarded to the attention of the Sustainability Working Group at the following addresses:

Polidoro S.p.A. - Via Lago di Misurina, 76 - 36015 Schio (VI)

Electronic Portal: https://polidoro.com /contacts/



This Policy will be **reviewed periodically** to ensure its adequacy and effective implementation. Revisions will be subject to approval by **Polidoro Management**.

POLIDORO S.P.A The President

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