

HUMAN RIGHTS AND WORKING CONDITIONS POLICY – Spanesi Group

Rev. 00 del 07/01/2025

English

1. Purpose

This Policy sets out Spanesi Group's commitments on human rights and working conditions, dignity at work, non-discrimination, and health & safety, in compliance with applicable laws and leading international standards.

2. Scope

Applies to all employees, directors, contractors, agents and consultants of the Group, as well as suppliers and business partners acting on behalf of the Group.

3. Core principles

- Respect for fundamental human rights and the dignity of every individual.
- Absolute prohibition of child labour and forced or compulsory labour.
- Non-discrimination and equal opportunities (gender, age, origin, religion, orientation, disability, opinions).
- Freedom of association and the right to collective bargaining, where provided by law.
- Fair working conditions: compliant working hours, adequate remuneration, rest periods, maternity/paternity safeguards.
- Occupational health, safety and wellbeing, with training and risk prevention.
- Zero tolerance for harassment, abuse, violence and any form of bullying.
- Confidentiality and personal data protection in compliance with applicable regulations.

4. Whistleblowing and reporting channels

A secure channel is available for reports, including anonymous ones. Reports are handled confidentially and without retaliation. Dedicated platform: areariservata.mygovernance.it (Spanesi channel).

5. Supply chain

Suppliers are required to adhere to standards equivalent to these principles. The Group may conduct audits, request corrective actions and suspend relationships in case of serious breaches.

6. Roles and responsibilities

Top Management sets objectives, allocates resources and oversees implementation. HR and Compliance ensure training, monitoring and case handling. Managers promote day-to-day application of the Policy.

7. Communication, training and monitoring

The Policy is communicated to personnel and made available to partners. Periodic training and monitoring indicators support continuous improvement.

8. Approval and review

The Policy is approved by the Board of Directors and reviewed at least annually or upon significant legal or organizational changes.

9. Definitions

For the purposes of this Policy:

- *Forced labour* follows the definitions of ILO Conventions No. 29 and No. 105;
- *Child labour* and *young worker* follow the definitions of ILO Conventions No. 138 and No. 182, as well as applicable local legislation;
- *Discrimination* follows the meaning established under ILO Convention No. 111 and applicable law.

10. Ethical recruitment

Spanesi Group adopts ethical recruitment practices by ensuring that:

- workers are not charged recruitment or hiring fees (*no-fee recruitment*);
- passports or identity documents are not retained;
- no deposits or financial guarantees are required;
- employment terms are provided in a language understood by the worker prior to commencement;
- workers retain full freedom of movement and can leave employment subject to contractual obligations.

11. Women's rights

The Group commits to:

- ensuring gender equality in access, pay, promotion and development;
- preventing the gender pay gap;
- protecting maternity and paternity rights, encouraging work-life balance measures;
- preventing and addressing gender-based harassment, with appropriate reporting channels.

Legal notes

Reference framework: Universal Declaration of Human Rights (UN), UN Guiding Principles on Business & Human Rights (UNGP), ILO fundamental Conventions, OECD Guidelines for Multinational Enterprises.

Legal compliance: this Policy supplements, and does not replace, applicable laws in the countries where the Group operates; in case of conflict the most protective standard for workers shall prevail.

Whistleblower protection: any form of retaliation against good-faith reporters is prohibited.