



## GROUP POLICY ON HUMAN RIGHTS

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## 1. PREMISE

Sogefi is committed to work responsibly, through a business model that identifies sustainability and respect for fundamental human rights as a key element in every decision and along all its business practices.

Sogefi Group conducts its business in compliance with all applicable laws and regulations, and in accordance with the highest standards of integrity and ethical behavior, as reflected in the Sogefi Code of Ethics and other Group internal policies, then respecting the legitimate interests of its stakeholders and of the community in which it operates. Moreover, Sogefi believes that respect for Human Rights is the foundation for liberty, justice and peace and for this reason, Sogefi welcomes the *Guiding Principles on Business and Human Rights of United Nations (2011)*.

This Policy outlines the basic principles to be followed at our plants and other sites worldwide by all the Group's employees and other individuals, by promoting and disseminating the respect for Human Rights as an essential requirement for the Group.

## 2. SOGEFI'S COMMITMENT TO RESPECTING HUMAN RIGHTS

The respect of internationally recognized human and labor rights is an essential requirement in the Group's operations and forms the basis of all its business relations.

At this regard, Sogefi endorses the respect of fundamental human rights, as stated in the *Universal Declaration of Human Rights of United Nations (1948)*, in the *International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work (1998)*, in the principles of the *United Nations Global Compact*, as well as in other national and international laws and standards, to which this Policy is consistent.

Furthermore, the Sogefi responsibilities to respect the international human rights standards, which means not to violate people's rights and to address adverse human rights impacts that they cause or contribute to. This universal responsibility is articulated in the *Protect, Respect and Remedy* framework, welcomed by the United Nations Human Rights Council in 2008<sup>1</sup>.

## 3. RECIPIENTS

This Policy has a worldwide validity and applies to Sogefi S.p.A., all Businesses and Legal Entities of the Group, as well as to all Sogefi's business partners - also remarked in the Group Code of Business Conduct to which refer.

This Policy is effective from the date of approval with permanent validity, except if it is necessary to review or substitute that policy, to ensure its compliance with the applicable regulations and standards.

## 4. PRINCIPLES

With the purpose of acknowledging, promoting and ensuring the respect of fundamental human rights by all the recipients, Sogefi undertakes to comply with the principles below reported.

### 4.1 Elimination of all forms of forced, compulsory and child labor

Sogefi does not tolerate any form of forced or compulsory labor, as defined by ILO Convention n. 29<sup>2</sup>, including threatening workers with severe deprivations, such as withholding food or land or wages, physical violence or sexual abuse, or bonding workers through debts, prison labor, indentured labor, military labor, modern forms of slavery, servitude and any form of human trafficking.

The Group rejects the use of child labor, where the age of employment is not in accordance with local labor law or less than the minimum established by the ILO Convention n. 138<sup>3</sup>.

### 4.2 Elimination of discrimination and harassment

Sogefi does not tolerate any form of discrimination, as stated by ILO Conventions n. 100<sup>4</sup> and n. 111<sup>5</sup>, including any distinction, exclusion or preference based on sex, ethnicity, skin color, national extraction or social origin, religion or political opinions.

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<sup>1</sup> United Nations, *Protect, Respect and Remedy: a Framework for Business and Human Rights*, 2008

<sup>2</sup> International Labour Organization, *C29 Forced Labour Convention*, 1930

<sup>3</sup> International Labour Organization, *C138 Minimum Age Convention*, 1973

<sup>4</sup> International Labour Organization, *C100 Equal Remuneration Convention*, 1951

<sup>5</sup> International Labour Organization, *C111 Discrimination (Employment and Occupation) Convention*, 1958

Sogefi is committed to valorize diversity and ensure equal opportunities within the workplace and in relation to its pursuing and sourcing activities, including access to training and education and avoiding any form of harassment - such as threats, intimidations or physical, verbal, sexual or psychological abuses

#### **4.3 Respect of fair employment and occupation conditions**

Sogefi promotes a fair employment and occupation conditions, by guarantying competitive compensation and benefits and assuring that working hours, including overtime, are compliant with local laws and regulations and collective labor contracts.

Sogefi adopts objective criteria to set non-discriminatory payment of wages, in order to provide to its employees' wages that are not lower than the minimum set in the collective labor contracts and local laws, in accordance with the provisions of the ILO Conventions.

All employees shall have written labor contracts, defining wages and benefits payment.

#### **4.4 Freedom of association and collective bargaining**

Sogefi recognizes to all workers the right to freely form and join groups for the support and advancement of their occupational interests, and to independently affiliate with international organization in pursuing their mutual interests, as defined by ILO Conventions n. 87<sup>6</sup> and n. 98<sup>7</sup>.

Sogefi respects the process of collective bargaining used as instrument for determining the contractual conditions of work, as well as for regulating the implementation of collective agreement.

At this regard, the Group endorses not discriminate against members of employee organizations or trade unions, but, on the contrary, support and foster direct communication between workers and management. Furthermore, in countries where this right is restricted by local laws, the Group is committed to support alternative legitimate options for employee participation.

#### **4.5 Attention to occupational health and safety**

As stated in the Group Health and Safety Policy to which refer, Sogefi believes that ensuring a healthy and safe working environment is an essential responsibility towards its employees, and thus it is fully committed to preventing accidents and injuries as well as improving working environment and workplace conditions, through the provision of adequate training and information within the organizations and the whole supply chain.

### **5. PROMOTION OF HUMAN RIGHTS IN THE SUPPLY CHAIN**

Sogefi is committed to actively promoting and disseminating the respect of the above principles regarding the fundamental human rights along its supply chain.

The Group expects all its business partners will be compliant with values and principles guiding Sogefi activities and with all applicable local laws in the countries in which they operate.

### **6. ATTENTION TOWARDS COMMUNITIES**

The Group is also aware of its impact on communities in which it operates, and it is committed to respect local cultures and values, as well as to engage with local stakeholders and to discuss on human rights issues related to the Group's business.

### **7. IMPLEMENTATION AND MONITORING**

This document represents the commitment to fundamental human rights that Sogefi has made publicly to the community and to its stakeholders.

Whenever external stakeholders, employees, or others Sogefi's partners believe that a violation of the principles contained in this Policy has occurred, they can report it following the instructions reported in the Whistleblowing Procedure. Any needed investigation and action will be properly evaluated.

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<sup>6</sup> International Labour Organization, *C87 Freedom of Association and Protection of the Right to Organize Convention*, 1948

<sup>7</sup> International Labour Organization, *C98 Right to Organize and Collective Bargaining Convention*, 1949