

Labour, safety and human rights policy

1 Preamble.

Marsilli is convinced that the success of a company depends on the people that make up the company and on the degree and the quality of their involvement. An active participation, which is proactive and aimed at cooperation addressed towards a common goal, is to be considered an approach to be promoted and cultivated in every organizational area, as intellectual involvement is the element on which innovation, creativity and technological development is based and that are fundamental to its growth. Consequently, Marsilli believes that people are strategic assets with whom it can constantly measure itself against and on which to count for its ambition of growth and leadership in the market. With this in mind, Marsilli has developed a company culture and management style that aim at a balance between company needs, quality of life in the plant and family needs and life outside the workplace of our people, leaving them ample freedom to shape the contribution provided based on their expectations and goals. This approach, together with the spirit of participation that Marsilli constantly encourages, are the levers upon which Marsilli corporate spirit acts. This spirit, of course, cannot disregard the respect of human rights, as they are represented and re-elaborated in their various forms, be they social or cultural, civil, political and economic. This is the reason why Marsilli has issued this “Labour, safety and human rights policy” (hereinafter “Policy”) as legal and value reference to be applied and guaranteed in every part of its organization.

2 Regulatory framework

This Policy, in addition to the principles shown in Marsilli Code of Ethics, is also inspired by those found in the following international regulations:

- United Nations Universal Declaration of Human Rights.
- International Covenant on Economic, Social and Cultural Rights (ICESCR).
- International Covenant on Civil and Political Rights (ICCPR).
- Conventions of the International Labour Organization (ILO).
- United Nations Sustainable Development Goals (SDGs) represented in the 2030 Agenda signed on 25 September 2015

3 Recipients and field of application

This Policy is adopted by all the companies that are part of the Marsilli Group. Recipients are their highest Administrative Bodies and all the bodies and individuals who make up the hierarchical chains that govern the organizational structures, who are required, without any exception, to apply the principles set out below.

4 Adoption of Principles in specific areas

Below are the principles adopted in the five areas that have been identified as being significant in the intent places in this Policy:

- Working conditions
- Health and safety

- Social dialogue and freedom of association.
- Forced, compulsory and child labor.
- Diversity, inclusion and non-discrimination

4.1 WORKING CONDITIONS

4.1.1 Fair Compensation.

Marsilli embraces the principle of fair compensation for the work carried out, as established by the International Conventions referred to in point 2 above. In the countries where it operates with its production facilities, Marsilli guarantees the application of the laws in force regarding economic and regulatory aspects referable to work services and, as suggested by the ILO Conventions, those established by collective agreements if applicable.

4.1.2 Working hours, daily and weekly rest, periodic holidays.

Marsilli embraces the principles regarding working hours, daily and weekly rest and the enjoyment of periodic holidays, as established by the International Conventions referred in point 2 above. In the countries where it operates with its production facilities, Marsilli guarantees the application of the laws in force regarding the aspects mentioned above and, as suggested by the ILO Conventions, those established by collective agreements if applicable.

4.1.3 Training.

Marsilli is aware that training is an essential and fundamental tool for the orientation and professional development of its human resources. Consequently, developing practices and policies aimed at training people, enhancing the forms of involvement and participation in understanding the environment in which they operate are fundamental steps for the development and consolidation of individual skills, as well as for maintaining skilled and talented employees within the company. As defined in the Code of Ethics, all operators in charge of identifying the training needs of human resources must identify these needs in respect of internal needs aimed at improving the quality of the services provided by Marsilli and developing the professional potential of individuals. Under no circumstances is instrumental, discriminatory or improper use, whether positive or negative, of professional training mechanisms permitted, even if this is in the interest or to the advantage of Marsilli.

4.1.4 Career and equal opportunities.

Marsilli embraces the principles aimed at guaranteeing the possibility for all workers of being able to benefit from career advancements, as established by the International Conventions referred to in point 2 above. In countries where it operates with its production facilities, Marsilli guarantees these opportunities without other consideration than that of professional skills, personal aptitudes and length of service.

4.2 HEALTH AND SAFETY AT WORK.

As established by the International Conventions referred to in point 2 above, Marsilli protects the psychophysical integrity of its collaborators by offering working conditions respectful of the dignity of the individual and healthy and safe working environments, in full compliance with the regulation on the prevention of accidents at work in force in the countries where the company operates with its production facilities. With this in mind, Marsilli schedules prevention aiming at a coherent whole that embraces technique, organization, working conditions, social relations and influence of

the working environment, and undertaking to spread and consolidate among all its employees and collaborators a culture of safety based on development of risk awareness and promoting responsible behaviour from everyone, including through the application of specific provisions and appropriate instructions. Impacts of the measures taken are constantly monitored through the use of safety indicators and the implementation of specific and appropriate control procedures.

4.3 SOCIAL DIALOGUE AND FREEDOM OF ASSOCIATION.

4.3.1 Social Dialogue.

As established by the International Conventions referred to in point 2 above, Marsilli guarantees the creation and development of a social dialogue aimed at promoting the freedom of expression and free exchange of ideas with its workers, in order to foster the satisfaction of mutual interests by avoiding the use of conflicting means.

4.3.2 Freedom of association and Collective Bargaining.

As established by the International Conventions referred to in point 2 above, Marsilli recognizes the workers' right to free association and collective bargaining as means to promote discussion among the parties aimed at the protection of legitimate interests.

4.4 FORCED, COMPULSORY AND CHILD LABOUR

4.4.1 Child Labour.

As established by the International Conventions referred to in point 2 above, Marsilli does not resort to any form of child labour and complies with the definitions provided in this regard by the legislation of the countries where it operates with its production facilities.

In this regard, the Company undertakes not to involve in its activity workers under the minimum age established by the law of the country where they operate and, in any case, under the age of 16.

4.4.2 Forced and compulsory labour.

As established by the International Conventions referred to in point 2 above, Marsilli rejects forced and compulsory labour in all forms it may be implemented.

4.5 Diversty, inclusion and Non-discrimination

4.5.1 Diversity and Inclusion

Marsilli considers diversity of gender, culture, ethnicity, religion or politics as something to address in order to promote the common threads which are necessary to foster inclusion and participation of everyone. Inclusion and participation are key for people's full involvement in projects and activities. With this in mind, diversities, as listed above, must be addressed by enhancing their peculiarities and promoting behaviours that guarantee equal opportunities for all workers without distinction. By embracing the principles established by the International Conventions referred to in point 2 above, Marsilli enhances diversities in order to capture the added value and richness that comes from the melting pot of cultures and different sensitivities.

4.5.2 Non-discrimination.

By embracing the principles established by the International Conventions referred to in point 2 above and in the Code of

Ethics, Marsilli accepts respect for the human person as central value and priority of all company activities. This with particular reference to inalienable rights recognized to it, such as freedom, dignity, personal development, respect for political and religious beliefs. Marsilli, therefore, with reference to the various areas in which the working relationships is conducted, rejects any discriminatory behavior based on age, gender, health condition, nationality, language, ethnicity, race, religion, culture and traditions, political beliefs, lifestyle and sexual orientation.

5 Implementation and supervision.

Implementation of the Policy is the responsibility of the Management of each company of the Group, in the people who compose them, at different hierarchical levels. Marsilli incorporates the principles of this Policy into its management model and undertakes to review it annually in light of its adequacy and effectiveness of implementation, being aware that other issues may become relevant over time. For Italian companies, supervision of compliance with the principles established by this Policy is entrusted to the Supervisory Board of each company, where present, whereas for non-Italian companies, or companies without Supervisory Board, this role is played by their highest administrative body or another specifically appointed control body. Anyone is authorized to report violations to this Policy they may become aware of. For Italian companies, these reports will be addressed to the Supervisory Board of each company, where present, whereas for non-Italian companies, or companies without Supervisory Board, reports will be addressed to Marsilli S.p.A. Supervisory Board. The Supervisory Board is responsible for investigating evidence of the reported violation, after listening to the reasons of the reporting party and the allegedly responsible for the breach, as defined in the Operation Rules of the Supervisory Board. For non-Italian companies or companies without a Supervisory Board, this activity is carried out by the highest administrative body or another specifically appointed control body, on the initiative of Marsilli S.p.A Supervisory Board.