

# Labour, safety and human rights policy.

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## 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 are based upon and that are fundamental to its growth. Consequently, Marsilli believes that people are strategic assets with whom it can constantly measure itself with 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 on 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 Marsilli issued this “Labour, safety and human rights policy” (hereinafter also the “Policy”) to be used as legal and value-based reference to be applied and guaranteed in all areas of its organization.

## 2 Regulatory Framework

This Policy, in addition to the principles described in the 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 fields 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.

The principles adopted are shown below in the five areas, which were identified as significant to the purposes set out in this Policy:

- Working conditions.
- Health and safety.
- Social Dialogue and freedom of association.
- Forced, compulsory child labour and Human trafficking.
- Diversity, inclusion and no discrimination.

### 4.1 WORKING CONDITIONS.

#### 4.1.1 Fair Wages and Minimum living wage.

Marsilli guarantees its employees the minimum living wage and embraces the principle of fair wages for work carried out, as provided by the International Conventions mentioned above in Point 2. In the countries where it operates with its own production facilities, Marsilli guarantees the application of the laws in force regarding economic aspects and regulations referencing work performance and, as suggested by the ILO Conventions, those established by collective agreements if applicable.

#### 4.1.2 Working hours, daily and weekly rest, periodic holiday time.

Marsilli embraces the principles regarding working hours, daily and weekly rest and use of periodic holidays, as provided by International convention mentioned above in Point 2. In the countries where it operates with its own production facilities, Marsilli guarantees the application of the laws in force regarding the above mentioned aspects and, as suggested by the ILO convention, those established by collective contract, in applicable. Economic aspects and regulations referencing work performance 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 the 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 based on internal needs aimed at improving the quality of the services provided by Marsilli and developing the professional potential of individuals. In no case is an instrumental, discriminatory or inappropriate use allowed albeit positive or negative of professional training mechanisms even if it were to be in the interest or benefit of the Company.

#### 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 mentioned above in Point 2. In countries

where it operates with its own production facilities, Marsilli guarantees these opportunities without other consideration than that of professional skills, personal aptitudes and seniority.

## **4.2 HEALTH AND SAFETY AT WORK.**

As established in the International Conventions on above mentioned point 2 and in the Code of Ethics, Marsilli protects the psychological and physical integrity of its employees by offering work conditions that respect individual dignity and safe and healthy working environments. Which are in full compliance with the regulations on prevention of accidents on the workplace and protection of the workers, applicable in the country where it operates with its own production facilities. For this reason, Marsilli plans prevention aiming at a coherent complex that embraces technique, organisation, working conditions, social relationships and the influence of factors in the working environment and also by committing itself to spreading and consolidating, among its operators, a culture of safety based on the development and risk awareness and promoting responsible behaviour from everyone. Also, through the application of specific provisions and adequate instructions. The impact 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.**

In compliance with the established principles in the International Convention mentioned in the above Point 2, Marsilli guarantees creation and development of social dialogue aimed at promoting 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**

In compliance to the principles 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 LABOUR, CHILD LABOUR AND HUMAN TRAFFICKING**

### **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.

#### **4.4.3 Human trafficking**

As established by the International Conventions referred to in point 2 above, Marsilli rejects human trafficking in all forms it may be implemented.

### **4.5 DIVERSITY, 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 of people in projects and activities. With this perspective, diversities, as listed above, must be addressed by enhancing their characteristics and promoting behaviours that guarantee equal opportunities for all workers without distinction. By embracing the principles established by the International conventions referred to in above mentioned point 2, Marsilli enhances diversities in order to capture the added value and richness that come from the melting pot of different cultures and different sensitivities.

#### **4.5.2 Non-discrimination.**

By complying with the principles established by the International conventions referred to in point 2 above and in the Code of Ethics, Marsilli embraces respect for the person as a core and priority value in all its activities. This with particular reference to the inalienable rights conferred upon it, for example, freedom, dignity, personal development, respect for political and religious beliefs. Therefore, Marsilli, with reference to the various areas in which the working relationships is conducted, rejects any discriminatory behaviour based on age, sex, health condition, nationality, language, ethnicity, race, religion, culture and traditions, political and union opinions, or lifestyles and different sexual preferences.

### **4.6 REMEDIAL ACTIONS**

#### **4.6.1 Remedial actions in case of violations.**

In order to remedy any violations of the principles established in this Policy, Marsilli is committed to introducing appropriate procedures to ensure the elimination of the violation and its consequences for the people involved.

## **5 Implementation and supervision.**

Implementation of the Procedure is delegated to the Management of the individual companies that are part of the Group, in the persons at the various hierarchical levels that make them up. Supervision of compliance with the principles established by this Policy is entrusted, for Italian companies, to the Supervisory Bodies of the individual companies, where present, while for non-Italian ones, or those without a Supervisory Body, this function is carried out by their highest administrative body or by other specifically appointed control body. Anyone is authorized to report violations to this Policy of which they become aware. For Italian companies, the reports will be addresses to the Supervisory Bodies of the individual companies, where present, while for non-Italian ones, or those without a Supervisory Body, the reports will be sent to Supervisory Body of Marsilli S.p.A. The competent Supervisory Body is responsible for investigating the validity of the report, to listening, if necessary, to the reasons of the reporting person and the person responsible of the reported violation and to reporting on the matter according to what is

defined in the operating regulations of the Supervisory Body itself. For no Italian companies or for those without a Supervisory Body, this function is performed by the highest administrative body or by another control body specifically appointed, on impulse from the Supervisory Body of Marsilli S.p.A.

## **6 Policy revision and Performance indicators (KPI)**

Marsilli includes the principles of this Policy into its management model and, knowing that other issues may become relevant over time, is committed to revising it annually consideration of its adequacy and effectiveness of implementation. In order to monitor the implementation of the Policy, Marsilli undertakes to identify a number of indicators (KPI) and to measure their progress on an annual basis.