

Aquafil S.p.A.

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Human Rights Policy

Approved by the Board of Directors of Aquafil S.p.A.
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1. OBJECTIVES

This policy is aimed at letting everyone know that respecting Human Rights is a main requirement of all activities carried out within the Aquafil Group (hereinafter “Aquafil”), made up of Aquafil SpA and its subsidiaries.

Aquafil is inspired by the protection and promotion of human rights, inalienable and essential prerogatives of human beings and the foundation for the construction of societies founded on the principles of equality, solidarity, repudiation of war and the protection of civil and political rights, social, economic and cultural rights and the so-called third generation rights (right to self-determination, peace, development and protection of the environment).

Aquafil is inspired by the United Nations Universal Declaration of Human Rights, the Human Rights Principles of the UN Global Compact, the ILO Fundamental Conventions and the OECD Guidelines for Multinational Enterprises.

2. REFERENCE CONTEXT

In developing its corporate policies, Aquafil has taken into account the following regulatory references:

- The United Nation’s International Charter of Human Rights:
 - Universal Declaration of Human Rights, 1948;
 - International Convention on Civil and Political Rights, 1976;
 - International Covenant on Economic, Social and Cultural Rights, 1976;
- European Convention on Human Rights, 1950;
- UN Convention on the Rights of the Child, 1989;
- Fundamental Conventions of the International Labour Organization (ILO): by way of example, numbers 29/1930, 87/1948, 98/1949, 100/1951, 105/1957, 111/1958, 135/1971, 138/1973, 182/1999;
- Declaration on Fundamental Principles and Rights at Work, 1998;
- European Parliament resolution of 10 March 2021 with recommendations to the Commission on Corporate Due Diligence and Corporate Accountability.

In addition, Aquafil adheres to the following private sector standards and voluntary initiatives, in their most up-to-date editions:

- The Principles of the UN Global Compact, 1999;
- Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, 2011;
- ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, 1977;
- Guiding Principles on Business and Human Rights: implementing the United Nations “Protect, Respect and Remedy” Framework, 2011;
- Social Accountability International Standard 8000 (SA8000), 1997;
- Guidelines (OECD) for Multinational Enterprises against Slavery, 2020;
- WBCSD CEO Guide to Human Rights, 2020.

Aquafil’s company policies comply with Italian regulations and those of the countries in which it does business and are developed in line with the following internal regulatory references:

- Legislative Decree 231/2001 on the issue of the administrative liability of entities;
- Code of Ethics;
- Anti-corruption laws;
- Laws on freedom and trade union services in the workplace;
- Laws on health and safety at the workplace;
- Laws regarding working hours;
- Environmental laws;
- Laws regarding privacy and personal data protection.

Aquafil has also adopted various internal regulatory instruments to ensure effective, efficient and transparent management of its business activities, which also respect the principles and values set out in this policy. Among the aforementioned internal regulatory references, the following should be noted in particular:

- Code of Ethics;
- Organisational, Management and Control Model pursuant to Legislative Decree 231/2001 of Aquafil S.p.A. and of individual Group companies;
- Quality, Environment and Safety Policy (QES);
- ESG Policy;
- Enterprise Risk Management of the Aquafil Group;
- Organisational model and privacy management of the Aquafil Group;
- Additional relevant internal regulatory documents governing the operational activities carried out by the Company (for example, in the field of Health, Safety and the Environment, Supply Chain, Selection, hiring and management of Human Resources, Reporting management, Social Responsibility, Privacy).

3. FIELD OF APPLICATION

The set of ethical principles, values and behavioural rules set out in this policy must inspire the actions of all those who work inside or outside Aquafil's sphere of action (hereinafter the "Recipients").

The dissemination of this policy aims to be an opportunity to educate and meet the expectations of all stakeholders (shareholders, employees, customers, suppliers, investors, savers, etc.) in relation to the protection and respect of human rights, as well as to implement a monitoring action necessary to verify the respect of human rights within all the processes and related actions of Aquafil.

The main initiatives related to equity, diversity and inclusion as well as human rights in general, are established by the CEO and the Board of Directors of Aquafil, which approves this policy and its revisions.

In particular, by way of example, the following are Recipients of this policy:

- **the members of the Board of Directors**, who draw inspiration for setting company objectives from the principles in this document;
- **the members of the control and supervisory bodies**, who ensure compliance and observance of the contents of this policy in the exercise of their functions;
- **managers**, who give substance to the values and principles contained in this policy, taking responsibility internally and externally;
- **employees**, who, in compliance with current legislation, conform their actions and behaviour to the principles, objectives and commitments set out in this policy;
- **collaborators**, (i.e. consultants, agents) who, on an ongoing basis align their conduct with the inspiring principles of this policy;
- **suppliers** registered in the register;
- **customers** with an active contract.

All Recipients are responsible, each for matters within their competence, for compliance with this Human Rights policy. In particular, all actions, transactions, negotiations and, in general, the conduct of the Recipients during the performance of tasks, must be based on the principles and values set out in this policy, as well as be open to verifications and controls in accordance with current regulations and internal procedures.

In addition, persons with supervisory and coordination responsibilities are required to oversee compliance with this policy by their collaborators, as well as to take appropriate measures to prevent, identify and report potential violations.

4. FUNDAMENTAL PRINCIPLES

The fundamental principles in the field of human rights identified below, inspired by the standards established by the International Labour Organization (ILO), are an expression of the values Aquafil believes in and its company culture is based on.

These values express the standard of behaviour required of all Aquafil employees and collaborators.

a) Freedom of Association and Protection of the Right to Organise Convention (ILO No. 87)

Aquafil recognizes the right of its employees to form or join organizations aimed at defending and promoting their interests.

Aquafil undertakes to respect the principles of free association and the right of workers to collective bargaining and freedom of association, in line with local practices and laws in force. Where local laws and practices restrict these rights, Aquafil is committed to finding appropriate solutions to enable workers to exercise these rights.

b) Equal Remuneration Convention (ILO No. 100)

Aquafil promotes fair work and respects the principle of equal remuneration. Therefore, it is committed to ensuring a minimum wage that allows its employees to lead a dignified and acceptable lifestyle.

c) Elimination of discrimination in employment and occupation (ILO No. 111)

Aquafil combats any distinction, exclusion or preference (based on race, colour, gender, religion, political orientation and social origin) that may deny or alter equal opportunity or treatment in employment or occupational matters.

Behaviours that reveal any discrimination based on political or trade union opinions, religion, gender, ethnicity, nationality, age, sexual orientation, health status, family responsibilities and in general based on any characteristic of the human person are not allowed in either internal or external relations. Aquafil considers diversity an opportunity and a resource on the cultural, human and professional level, to be valued through dialogue and the comparison of opinions, ideas and experiences.

Aquafil values diversity and the dissemination of an inclusive culture, through the principle of equal treatment of all employees based on the professional skills and abilities of individuals.

Particular attention is paid to the development of welfare policies aimed at promoting the well-being of employees and the reconciliation of private and professional life.

d) Child labour (ILO No. 138, 182)

Aquafil believes in the value of human resources and is committed to implementing recruitment policies in compliance with the Minimum Age Convention and condemns all forms of exploitation of child labour. In business activities carried out directly or indirectly by Aquafil, only workers who have reached the minimum age for joining the workforce provided for by local law may be employed.

e) Improvement of health and work (ILO No. 187)

Aquafil promotes health and safety in the workplace and is committed to continuous improvement by providing workers with the financial, human and technical resources necessary to ensure that activities are carried out in healthy, safe and sustainable places, even through widespread and continuous training, information and awareness-raising action.

As far as the situation in Italy is concerned, Aquafil consistently works in compliance with the regulatory provisions contained in Legislative Decree 81/2008. The company's risk assessment documents are updated whenever there is any substantial change in tasks.

f) Abolition of forced labour and any form of corporal punishment or disciplinary practices not permitted by current legislation or ILO definitions (ILO No. 105)

Aquafil condemns any type of forced labour or other forms of slavery both at its production facilities and at those of its suppliers. Similarly, it does not tolerate any type of corporal punishment or disciplinary practices deemed unsuitable by current legislation.

Aquafil does not allow its workers to be subject to illegal pecuniary sanctions or disciplinary measures that compromise the dignity of the person involved.

g) Commitment to combat harassment and mobbing practices at the workplace

Aquafil is committed to ensuring a fair and professional working environment for all female and male workers, whatever the type of relationship established and the position they fill. Gender-based harassment, such as those based on sexual discrimination, deeply affects the dignity of the human being and violates the principle of equal treatment between people. Sexual harassment constitutes a subset and represents an even more burdensome form, characterized by harmful behaviours such as verbal offences, humiliation, intimidation, expressions of contempt, denigrating comments, vulgar proposals, even unwanted physical contact.

Aquafil also considers harassment any initiative that materializes into threats and retaliation after a negative response to a behaviour, even if not repeated, but undesirable for those who suffer it.

Aquafil rejects and condemns harassment in all its forms, and considers it even more serious when it is used, implicitly or explicitly, to exert pressure in the event of the hiring of a female or male worker, or in the event of decisions concerning his/her professional future, or when it has the purpose or effect of unreasonably interfering with the employee's professional performance or creating an intimidating, hostile, demeaning or offensive work environment.

4.1 Rights of local communities

Aquafil is committed to developing a climate of mutual and conscious respect with the local communities in the countries where it does business; also, it aims to reduce the negative impacts, on the social and environmental fabric, of the activities developed in production sites.

Aquafil is committed to informing and involving local communities aimed at their social and economic growth and having a positive influence on the surrounding areas.

4.2 Anti-Corruption Policy

Aquafil develops its activities by following logics of efficiency and ethics, rejecting any collusive or abusive behaviour to the detriment of third parties.

It actively supports the political measures taken against corruption, also aimed at increasing the awareness of the public. It therefore prohibits any form of corruption without exception, both in relations with the private sector and in relations with the Public Administration, which must be based on utmost transparency and fairness, as referred to in the Code of Ethics.

Although Aquafil promotes and encourages freedom of ideas and expression in any form, it prohibits making any political commitment on behalf of the group. Aquafil has deliberately chosen not to make political contributions and is not involved in any *lobbying* activities.

4.3 Protection of privacy

As it carries out its activities in Italy and abroad, Aquafil collects personal data that it undertakes to process in compliance with all personal data protection laws in force in the jurisdictions in which it does business.

To this end, Aquafil guarantees a high level of security in the selection and use of information technology systems intended for processing personal data and confidential information in accordance with the provisions in force. It aims to protect its IT resources by implementing security controls to prevent the unauthorized disclosure, alteration and destruction of information not accessible to the public, the interruption of the information processing service provided to users and the theft of resources.

5. REPORTS AND COMMITMENT OF AQUAFIL

Aquafil is constantly engaged in the identification, evaluation, prevention and mitigation of the risks of human rights violations, and will promptly implement the necessary remedial actions, should such events occur.

There is a channel available to its stakeholders (the “Whistleblowing / Reporting” procedure published on the Aquafil website) dedicated to reporting, even anonymously, all situations that, in violation of this policy, constitute or may constitute a risk of violation of human rights. The existence of the procedure and how it works have been proactively communicated both inside and outside Aquafil.

Aquafil ensures that each report is handled confidentially in order to safeguard protection of the whistleblower although anonymously.

In addition, Aquafil undertakes to:

- make its workers aware so that they conduct company tasks by respecting human rights;
- manage its supply chain responsibly and specifically include respect for human rights in the selection parameters of its suppliers, in contract clauses and in the verifications carried out during audits;
- management of the research and selection of Aquafil personnel, by ensuring equal treatment of the applications received, in accordance with the provisions of this policy.

6. INFORMATION, TRAINING AND MONITORING

This policy is distributed to all stakeholders through dedicated communications; in addition, Aquafil undertakes to disseminate the contents of this policy even through specially scheduled training courses and also undertakes to monitor their effective implementation by conducting investigations and audits.

Aquafil promotes respect for the fundamental principles of human rights even within its supply chain and promotes training that aims to reach everyone at the company, including Senior Managers⁽¹⁾ and others subject to the supervision and direction of Senior Managers; but above all, new hires will be provided adequate training, after verifying the appropriateness of their involvement in light of the tasks entrusted to them.

7. POLICY APPROVAL AND REVIEW

This policy will be subject to periodic review, aimed at examining its adequacy and effective implementation.

Review	Description	Date

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