

Aquafil S.p.A.

Via Linfano No. 9, 38062 – Arco (TN)
Registered in the Trento Business Register
under No. 228169
Tax Code and VAT number 09652170961

Human Rights Policy

Approved by the Board of Directors of Aquafil S.p.A.
on 31 August 2023

2022

AQUAFIL 

Index

1. Objectives	4
2. Reference Framework	4
3. Scope of Application	5
4. Fundamental principles	5
a) Freedom of Association and Protection of the Right to Organize (ILO No. 87)	6
b) Equal Remuneration (ILO No. 100)	6
c) Elimination of Discrimination in Respect of Employment and Occupation (ILO No. 111)	6
d) Child Labour (ILO No. 138, 182)	6
e) Improvement of Occupational Health and Safety (ILO No. 187)	6
f) Abolition of Forced Labour and Any Form of Corporal Punishment or Disciplinary Practices Not Permitted by Applicable Law and ILO Definitions (ILO No. 105)	7
g) Commitment Against Harassment and Workplace Bullying	7
4.1 Rights of Local Communities	7
4.2 Anti-Corruption Policy	7
4.3 Privacy Protection	7
5. Reporting and Aquafil's Commitment	8
6. Information, Training, and Monitoring	8
7. Policy Approval and Review	8

1. OBJECTIVES

This policy identifies respect for **Human Rights** as a primary and fundamental requirement for all activities carried out within the Aquafil Group (hereinafter “Aquafil”), composed of Aquafil S.p.A. and its subsidiaries.

The protection and promotion of human rights are guiding principles for Aquafil, which considers them essential entitlements of every individual. These rights form the foundation of societies built on equality, solidarity, rejection of war, and the safeguarding of civil, political, social, economic, cultural, and third-generation rights (such as self-determination, peace, development, and environmental protection).

In the planning and management of all its activities, Aquafil is guided by the Universal Declaration of Human Rights of the United Nations, the Human Rights Principles of the UN Global Compact, the Fundamental Conventions of the ILO, and the OECD Guidelines for Multinational Enterprises.

Furthermore, the company shapes its strategy and defines its priorities based on regular double materiality assessments, adopting an approach focused on impact mitigation, risk prevention, and opportunity evaluation.

2. REFERENCE FRAMEWORK

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

- International Bill of Human Rights of the United Nations (UN):
 - Universal Declaration of Human Rights, 1948
 - International Covenant 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): for example, No. 29/1930, 87/1948, 98/1949, 100/1951, 105/1957, 111/1958, 135/1971, 138/1973, 182/1999
- ILO 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 accountability.

Furthermore, Aquafil adheres to the following private sector standards and voluntary initiatives, in their most up-to-date versions:

- United Nations Global Compact Principles, 1999
- OECD Guidelines for Multinational Enterprises, 2011
- ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, 1977
- UN Guiding Principles on Business and Human Rights: Implementing the “Protect, Respect and Remedy” Framework, 2011
- Social Accountability International Standard SA8000, 1997
- OECD Guidelines for Multinational Enterprises on Combating Forced Labour, 2020
- CEO Guide to Human Rights by the WBCSD, 2020

Aquafil’s corporate policies comply with the laws of Italy and of the countries in which it operates, and are developed in accordance with the following internal regulatory references:

- Legislative Decree 231/2001 on corporate administrative liability
- Code of Ethics;
- Anti-corruption laws;
- Laws on trade union freedom and activities in the workplace;
- Health and safety legislation;
- Working time regulations;
- Environmental legislation;
- Privacy and personal data protection laws.

In addition, Aquafil has adopted several internal regulatory instruments to ensure effective, efficient, and transparent management of its activities, in full compliance with the principles and values set out in this policy. The following internal documents are particularly relevant:

- Code of Ethics;
- Organizational, Management and Control Model pursuant to Legislative Decree 231/2001 for Aquafil S.p.A. and its Group companies;
- Quality, Environment and Safety (QAS) Policy;
- ESG Policy;
- Aquafil Group Enterprise Risk Management;
- Aquafil Group Privacy Management Model;
- Other internal regulatory documents governing operational activities (e.g., Health, Safety and Environment, Supply Chain, Recruitment and Human Resource Management, Whistleblowing, Social Responsibility, Privacy).

3. SCOPE OF APPLICATION

The ethical principles, values, and behavioral standards set forth in this policy must guide the actions of all those who operate within or in connection with Aquafil’s sphere of activity (hereinafter referred to as the “Recipients”).

The dissemination of this policy serves as both an opportunity to educate and meet the expectations of all stakeholders (shareholders, employees, customers, suppliers, investors, savers, etc.) regarding the protection and respect of human rights, and to implement monitoring activities aimed at ensuring human rights are upheld throughout all processes and activities within Aquafil.

The main initiatives related to Equity, Diversity & Inclusion and human rights in general are defined by the Chief Executive Officer and the Board of Directors of Aquafil, who are also responsible for approving this policy and any subsequent revisions. Specifically, by way of example, the Recipients of this policy include:

- **Members of the Board of Directors**, who are expected to be guided by the principles of this policy when defining business objectives;
- **Members of supervisory and control bodies**, who are responsible for ensuring compliance with the content of this policy in the execution of their duties;
- **Managers**, who are expected to translate the values and principles of the policy into concrete actions, bearing responsibility both internally and externally;
- **Employees**, who must align their actions and conduct with the principles, goals, and commitments set out in the policy, in compliance with applicable laws;
- **Collaborators** (e.g., consultants, agents) operating on a continuous basis, who are required to adopt conduct in line with the guiding principles of this policy;
- **Registered suppliers**;
- **Clients** with an active contract.

All Recipients are individually responsible, within the scope of their roles, for complying with this Human Rights Policy. Specifically, all actions, operations, negotiations, and behavior undertaken in the course of their work must reflect the principles and values expressed in this policy and be subject to verification and control in accordance with applicable regulations and internal procedures.

Moreover, those with supervisory and coordination responsibilities must monitor compliance with the policy by their teams and implement appropriate measures to prevent, identify, and report potential violations.

4. FUNDAMENTAL PRINCIPLES

The fundamental principles on human rights outlined below—drawn from the standards set by the International Labour Organization (ILO)—represent the values in which Aquafil believes and upon which its corporate culture is based.

These values define the expected standards of conduct for all Aquafil employees and collaborators.

a) Freedom of association and protection of the right to organize (ILO No. 87)

Aquafil recognizes its employees' right to form or join organizations that protect and promote their interests.

The company is committed to upholding the principles of freedom of association and the right of workers to collective bargaining and free association, in line with local laws and practices. Where local legislation or practices restrict these rights, Aquafil undertakes to seek appropriate solutions to ensure that workers are still able to exercise them.

b) Equal remuneration (ILO No. 100)

Aquafil promotes fair work and respects the principle of equal remuneration. It is committed to ensuring that all employees receive at least a minimum wage that allows them to lead a decent and acceptable standard of living.

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

Aquafil opposes any distinction, exclusion, or preference (based on race, color, sex, religion, political opinion, or social origin) that may deny or compromise equality of opportunity or treatment in employment or occupation.

Discriminatory behavior based on political or union opinions, religion, gender, ethnicity, nationality, age, sexual orientation, health status, family responsibilities, or any other personal characteristic is not tolerated in internal or external relations.

Aquafil views diversity as an opportunity and a valuable resource—culturally, personally, and professionally—to be fostered through dialogue, exchange of opinions, ideas, and experiences.

The company promotes diversity and an inclusive culture by ensuring equal treatment based on individuals' skills and professional capabilities.

Special attention is given to the development of welfare policies aimed at enhancing employee wellbeing and supporting work-life balance.

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

Aquafil values human resources and is committed to implementing hiring practices in compliance with minimum age conventions, condemning all forms of child labor exploitation.

Only individuals who meet the minimum legal working age in the country of employment may be employed, whether directly or indirectly, in activities carried out by Aquafil.

e) Occupational health and safety (ILO No. 187)

Aquafil promotes health and safety in the workplace and is committed to continuous improvement by providing employees with the financial, human, and technical resources needed to ensure that work is conducted in healthy, safe, and sustainable environments. This includes extensive and ongoing training, information-sharing, and awareness campaigns.

In Italy, Aquafil complies with the provisions of Legislative Decree 81/2008. Risk assessments are updated any time there is a substantial change in workplace activities.

f) Abolition of forced labour and prohibited disciplinary practices (ILO No. 105)

Aquafil condemns all forms of forced labor and slavery, whether in its own facilities or in those of its suppliers. Likewise, the company does not tolerate any form of corporal punishment or disciplinary practices that are prohibited by applicable laws or deemed inappropriate under ILO definitions.

Aquafil does not allow workers to be subjected to unlawful monetary penalties or disciplinary actions that compromise human dignity.

g) Commitment against harassment and mobbing practices at the workplace

Aquafil is committed to ensuring a respectful and professional working environment for all employees, regardless of the nature of their employment relationship or their role. Gender-based harassment—such as behavior grounded in sexual discrimination—profoundly undermines human dignity and violates the principle of equal treatment. Sexual harassment, a particularly serious form, may include verbal abuse, humiliation, intimidation, derogatory remarks, vulgar propositions, and unwanted physical contact.

Aquafil also considers harassment to include any conduct involving threats or retaliation following a negative response to unwelcome behavior, even if the behavior is not repeated.

The company strongly rejects and condemns all forms of harassment, especially when such conduct—either implicitly or explicitly—is used to pressure an employee in hiring decisions or to influence their professional path.

Harassment is equally condemned when it interferes with an employee’s work performance or creates an intimidating, hostile, humiliating, or offensive work environment.

4.1 Rights of Local Communities

Aquafil is committed to fostering a climate of mutual respect and awareness with the local communities in the countries where it operates, and to reducing any negative social and environmental impacts resulting from its production site activities.

The company is dedicated to informing and engaging local communities to promote their social and economic development and to exert a positive influence on the surrounding territories.

4.2 Anti-Corruption Policy

Aquafil conducts its business based on principles of efficiency and integrity, rejecting any form of collusion or abuse to the detriment of third parties.

The company actively supports political measures against corruption, including efforts to raise public awareness of the issue. It strictly prohibits all forms of corruption without exception, both in dealings with private individuals and with public authorities. All such relationships must be conducted with maximum transparency and integrity, as also stated in the Code of Ethics.

While Aquafil promotes and encourages freedom of thought and expression in all forms, it expressly forbids any political commitment on behalf of the Group. By choice, Aquafil does not make political contributions and is not involved in any lobbying activities.

4.3 Privacy Protection

In the course of its activities in Italy and abroad, Aquafil collects personal data which it undertakes to process in compliance with all applicable data protection laws in the jurisdictions in which it operates.

To this end, Aquafil ensures a high level of security in the selection and use of IT systems used to process personal data and confidential information, in accordance with applicable regulations.

The company seeks to protect its IT resources by implementing security controls designed to prevent unauthorized disclosure, alteration, or destruction of non-public information, interruption of information processing services provided to users, and theft of resources.

5. REPORTING AND AQUAFIL'S COMMITMENT

Aquafil is continuously committed to identifying, assessing, preventing, and mitigating risks related to human rights violations, and takes prompt remedial action should such incidents occur.

A dedicated channel is available to stakeholders—described in the “Whistleblowing / Reporting” procedure published on Aquafil’s website—for reporting, including anonymously, any situations that violate or may pose a risk of violating this policy and human rights in general. The existence of this procedure and how it works has been proactively communicated both internally and externally.

Aquafil ensures that all reports are handled confidentially in order to fully protect the identity and rights of the whistleblower, including in the case of anonymous submissions.

Furthermore, Aquafil is committed to:

- Raising awareness among its employees to conduct business activities in full respect of human rights;
- Responsibly managing its supply chain, specifically by incorporating human rights respect into supplier selection criteria, contractual clauses, and audit-based assessments;
- Managing recruitment and selection activities in a way that ensures equal treatment of all applicants, in line with the principles established in this policy.

6. INFORMATION, TRAINING, AND MONITORING

This policy is distributed to all stakeholders through dedicated communications. Additionally, Aquafil is committed to disseminating the contents of this policy through specifically designed training activities and to monitoring its effective implementation through surveys and audits.

Aquafil promotes respect for fundamental human rights principles throughout its supply chain and supports training initiatives aimed at reaching all personnel. This includes both **senior management** and individuals under their supervision and direction, with a particular focus on **new hires**, who will receive appropriate training after an assessment of the relevance of their involvement based on the roles assigned to them.

7. POLICY APPROVAL AND REVIEW

This policy has been approved by Aquafil’s Board of Directors.

It is subject to periodic review in order to ensure that it remains aligned with applicable laws, international standards, and the company’s strategic objectives in the field of human rights.

Any amendments or updates will be evaluated and approved by the competent governance bodies, based on inputs collected through monitoring activities, internal audits, or changes in legislation and best practices.

The Human Rights Policy is made available to all stakeholders and is communicated internally and externally through appropriate channels. Its content is also shared through targeted training programs, and its implementation is continuously monitored.

Review	Description	Date	Approved by
1.0	Reference to double materiality	10/07/2025	BoD

Aquafil S.p.A.

Via Linfano, 9

38062 Arco (Tn)

T +39 0464 581111

www.aquafil.com

info@aquafil.com