



HUMAN RIGHTS POLICY

June 2023

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1. Purpose

A.D.R. Group (from now on also “**A.D.R.**” or “**Group**”) is dedicated to actively upholding human rights and ensuring the welfare of employees and partners involved in and associated with the Company. The commitment **to protect and respect human rights** extends to the employees, management staff in all business regions, business partners, and, to the extent of the Group’s leverage and responsibility, other entities within the supply chain.

A.D.R. Group understands that human rights issues are extensive and intricate, necessitating a comprehensive approach. Therefore, the Group has identified **sensible areas** across its business activities where the Group concentrate its efforts. This Policy statement sets out the Human Rights Principles for A.D.R. Group’s actions and behaviour in relation to each of these key areas. A.D.R. Group expect full engagement from all its employees and business partners in aligning with the Group’s priorities throughout the value chain.

2. Scope

This Policy applies to the whole **A.D.R. Group** and its **employees**, regardless of their role or position, as well as to those acting for or on behalf of the Company, in every Business region.

The Policy applies also to **suppliers** and **business partners**. A.D.R. Group is committed to ensuring that its suppliers, as well as their subcontractors and any other subject belonging to its value chain, adhere to this Policy and embrace its principles.

3. Regulatory framework

A.D.R. Group’s approach is guided by the principles established by the main **internationally recognized standards, regulations and conventions**, such as:

- The International Bill of Human Rights, which includes the United Nations Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights
- The UN Guiding Principles on Business and Human Rights
- The eight Conventions of the International Labour Organization (ILO)
- The Guidelines of the Organization for Economic Co-operation and Development (OECD) for Multinational Enterprises
- The Charter of Human Rights of the European Union
- The European Convention on Human Rights
- Italian Legislative Decree no. 231/2001

4. Human Rights Principles

A.D.R. Group is committed to respecting fundamental human rights and ensuring fair and adequate working conditions in all Company facilities and requires all persons covered by the scope of this Policy to do the same. The following is a non-exhaustive list of the main areas of human rights that are intended to be addressed through this Policy.

A.D.R. Group expects **all its suppliers and business partners** to adhere to the principles set out in this Policy and to respect the fundamental human rights of its employees.

4.1 Elimination of all forms of forced, compulsory and child labour

A.D.R. Group **rejects and prohibits any form of forced or compulsory labour**, as defined by the ILO Fundamental Convention n. 29 on Forced Labour as work extorted by any person under the menace of any penalty. No employee may be coerced into working by force, intimidation, or

retaliation. All employees must also be free to terminate their employment with the Company, without fearing any kind of reprisal.

The Group respects children's rights and **does not tolerate child labour** and does not employ persons who are less than 18 years of age or who have not yet reached the minimum age for admission to employment under the law of the relevant country, whichever is the most stringent.

4.2 Elimination of discrimination and harassment

A.D.R. Group is committed to **fostering equal employment opportunities** and to creating a work environment where everyone feels welcome and included. All employees should be able to express their selves, regardless of gender, sexual orientation, ethnicity, origin, disability, medical condition, age, cultural and social background, religion, belief, social and marital status, and family responsibility, with no fear of discrimination. The Company prohibits any type of harassment, as it considers it cruel, inhumane, and degrading.

A.D.R. Group is committed to providing equal opportunities to everyone wishing to become part of the Company, prohibiting discrimination and bias of any kind in all recruitment and employment processes. The Company recruits and hires employees based on their experience, knowledge, and skills and is committed to **providing equal opportunities** to all employees, both on the job and in their career advancement.

The company consider women's empowerment as a strength. As such, A.D.R. Group **strives to increase women's representation** at all levels and in all departments.

4.3 Freedom of association and the effective recognition of the right to collective bargaining

A.D.R. Group's employees are free to be represented by **labour organizations or to join a trade union** by locally applicable legislation and practice, including the fundamental right of collective bargaining. It also strives to ensure that persons engaged in the organization or representation of workers and employees taking part in strikes in compliance with the national law are not in any way penalized or subjected to forms of retaliation.

4.4 Working hours and fair wages

Employees must be paid for the effective hours worked, including overtime, following applicable laws and national collective labour agreements, if available and more favourable. A.D.R. Group guarantees working conditions that respect the **health, safety and well-being of its employers**. The Company commits to respect the number of working hours in compliance with all applicable international, national and local legal requirements and national collective labour agreements, to ensure **rest periods** during the day and the week and annual paid leave.

Employees are guaranteed **equal pay for equal work** and the Company is committed to eliminating differences in compensation based on gender or any discriminatory bias. Workers must be entitled, at a minimum, to a living wage and must be aware of the amount of their compensation before they start to work, which shall also be written in the employment contract in a language the worker can understand.

4.5 Occupational health and safety

A.D.R. Group is committed to protecting and promoting the health and safety of its employees and anyone who enters its sphere of influence by complying with health and safety regulations in the countries it operates in.

The company strives to ensure **work-life balance** to preserve the well-being of employees, guaranteeing appropriate rest periods and listening to their needs.

4.6 Contribute to the respect and development of local communities

To this end, A.D.R. Group and all its suppliers and third parties shall respect rights of communities and individuals. Purpose of A.D.R. Group is to respect the human rights of the various communities, including their traditions, customs and cultural heritage.

Furthermore, the Group, as well as its suppliers and business partners, seek to avoid, minimize, mitigate and remediate potential negative impacts and risks arising from their activities.

5. Implementation, monitoring and review

This Policy is made accessible to all the recipients via internal and external corporate channels, such as corporate email, the "Sustainability" section of the Company website and posted on boards in the production facilities.

Plant managers in each business region are responsible for implementing and monitoring compliance with the values and principles described in this Policy. However, the protection of Human Rights is a shared responsibility between the management of the Group, its employees, and its suppliers, and all the recipients must be committed to promoting these values.

This Policy will be periodically updated in its content in line with developments in the applicable laws and standards. Important and relevant inputs for the improvement of this Policy may come from the dialogue with all the stakeholders.

6. Approval

This Policy is presented and approved by the Board of A.D.R. Group and signed by the President .

The Board, together with the top management, oversees its implementation and is responsible for ensuring adherence to these commitments, both at the regional and central levels.

Name of the President: Flavio Radrizzani

Signature:

