

### **General Commitments**

Palladio Group believes in the dignity of every human being and in the respect of individual rights. Respect for human rights is in fact deeply rooted in the values of Palladio Group, in the way we manage our business, interact with stakeholders and engage with the communities of the countries in which we operate.

At Palladio Group we respect international principles aimed at promoting and protecting the human rights recognized by the principles of the United Nations Global Compact and defined by the Universal Declaration of Human Rights and the Declaration of the International Labour Organization (ILO) on fundamental principles and rights at work.

This Policy aims to communicate the expectations and commitments of Palladio Group.

### **Scope of the Policy**

This Policy applies to all employees of Palladio Group, associated companies and/or affiliates and also contractors working at our sites are required to respect this policy. Furthermore, in relation to our sustainable procurement policy, we also promote with our suppliers the principles of this policy.

### **Our Commitment**

Our commitment is formalized and declared through various policies. This Policy integrates and collects all aspects related to Human Rights contained in other Policies and Group guidelines such as: Code of Ethics, Charter of Values, Code of Conduct, Ethical Trading Initiative Code, Health and Safety Policy, Environmental Policy, Politics Forest Sustainability, Social Responsibility Policy.

Palladio Group is committed to the highest ethical conduct in all aspects of business, including human rights, labour, anti-slavery, the environment and anti-corruption. It respects fundamental human rights and considers them as a key component of corporate social responsibility.

We will continue to engage with stakeholders regarding the evolution of our human rights commitments and programs.

Through our annual report we will regularly report on our progress.

### **Equal opportunities and non-discrimination**

Palladio is committed to offering equal opportunities in recruitment, hiring practices, contracts, development, promotion and compensation, working conditions or any other opportunity regardless of age, color, gender, gender identity, disability, nationality, race, religion, sexual orientation, ethnicity, ancestry, pregnancy or any other legally protected characteristic in accordance with applicable laws.

**Health & Safety**

we are committed to the health and safety of our employees and to achieve the goal of zero accidents and general wellbeing in the workplace, in accordance with our Health and Safety at Work Policy.

**Work Standards**

We maintain working standards including extra hours, conditions, wages and salary practices in accordance with the laws of the countries in which we operate.

**Salaries and benefits**

We respect local minimum wages and use market and industry standards to apply fair wages where there is no wage bill to support our staff basic needs. We also offer our employees the opportunity to increase and strengthen their skills.

**Forced labour and child labour**

We condemn the use of forced labour and child labour as defined by the ILO Declaration on the Principles and Fundamental Rights of Labour.

**Freedom of association and collective bargaining**

We respect the right of our employees to freely join, according to their will, trade unions or similar organizations, without this leading to any advantage or disadvantage attitude towards them. We respect the right to collective bargaining in accordance with local laws.

**Privacy**

We respect individual privacy expectations and protect the personal information we collect, use and disclose in connection with our business.

**Anti-slavery and human trafficking**

Modern slavery is a crime that gives rise to a despicable abuse of human rights. The Modern Slavery Act of 2015 sanctions it through the provision for the crimes of "slavery, servitude and forced or forced labour" and "trafficking in human beings", which have in common the deprivation of one person's freedom by another to exploit them for personal or commercial gain.

The provision on transparency in the supply chain contained in the Modern Slavery Act concerns the role of companies in preventing the practice of modern slavery in their organizations and supply chains.

Palladio Group has a zero tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business relationships and to implement and apply effective systems and controls to ensure that modern slavery does not occur in any of the our internal or external activities. We are also committed to ensuring that there is

transparency in our activities and in our approach to the fight against modern slavery in all our supply chains.

## **Commercial Partners**

We expect adequate standards of conduct and respect for human rights, consistent with ours, from our suppliers, contractors, sellers and partners. Our suppliers are required to accept our Supplier Code of Conduct , established to ensure that they share the principles and ethics of Palladio Group and we expect them to retain their suppliers with the same standards. This Code of Conduct is one of the essential conditions of our relationship with suppliers together with the contractual relationship.

## **Conformity**

In implementing this Policy, we also undertake to comply with all applicable laws of the countries in which we operate.

In the event that national laws and international human rights standards differ, we will follow the highest standard; where they conflict, we will abide by national laws, while seeking ways to respect international human rights to the fullest extent possible.

## **Remedies**

We try to prevent or mitigate the negative impacts on human rights directly related to our operations, products or services. If Palladio Group identifies the risk of a negative impact in the area of human rights or labour rights, it will take the necessary measures for its reduction / interruption by carrying out actions to limit as much as possible the residual impacts.

## **Notification and reporting**

The reporting and mitigation of problems concerning human rights and workers' rights are managed in compliance with the company Code of Ethics which provides for a specific procedure for reporting violation (wistleblowing).

## **Responsibility**

The Ethics Committee of each plant, in collaboration with the Human Resources Manager, is responsible for ensuring compliance with these commitments and our Chief Executive Officer is responsible for overseeing their implementation and ensuring that any violation of the Code of Ethics is investigated..

If an employee believes that someone is violating the Human Rights Policy or the law, as required by the Code of Ethics, he has the duty to report it immediately to his / her manager, to the Human Resources, to the Ethics Committee through the reporting procedure (Wistle Blowing).

**United Nations Global Compact (UNGC)**

Palladio Group is a signatory of the United Nations Global Compact, a public-private initiative for organizations engaged in social and environmental sustainability. This means that we are committed to supporting the 10 internationally recognized principles on human rights, labour standards, environmental sustainability and the fight against corruption.

Chief Executive Officer  
Dr. Mauro Marchi

