

Policy for the safeguarding and protection of human rights and diversity

The Management of Carpad Spa considers it of paramount importance to implement a Policy for the safeguarding and protection of human rights and diversity, which has as its prerequisites the respect of such rights and the promotion of employees' welfare, indispensable values and principles on which the company's culture and strategy are based and which represent a priority in all business areas.

Hence Carpad Spa is committed to making a significant contribution to spreading awareness of the importance of the principles contained in this Policy.

APPROACH AND COMMITMENT

The Management of Carpad Spa believes in the sustainable development of business and considers the respect for human rights and proper compliance with labour law as an integral part of responsible business behaviour.

It recognises people as an indispensable element for the development of the Company and promotes their skills, competencies, commitment and creativity, protecting their work, health and safety and guaranteeing safe and secure working conditions and environment, as well as a system of values and principles relating to legality, transparency and sustainable development.

GOAL

Acknowledging that issues related to human rights are vast and complex and require an articulated approach, the objective of this document is to define, structure and develop a clear approach on the subject and to promote the principles contained in this policy, including through continuous training aimed at Carpad's staff and suppliers, with special focus on aspects related to health and safety, integrity and business ethics, inclusion and diversity and sustainability issues.

INTERNATIONAL AND REFERENCE FRAMEWORK

This Policy constitutes a manifesto committing the company to promote the protection of human rights for all the people working in its "value chain".

Although it operates in Italy, where the legal framework regulates the respect of fundamental human rights, Carpad Spa undertakes to respect and actively disseminate the principles set forth in the regulations and standards issued by international reference organisations, including

- the Universal Declaration of Human Rights and subsequent international conventions on civil and political rights and on economic, social and cultural rights;
- the Declaration on Fundamental Principles and Rights at Work and the eight Core Conventions of the International Labour Organisation (ILO);
- the UN Conventions on the Rights of Women, on the Elimination of All Forms of Racial Discrimination, on the Rights of the Child, and on the Rights of Persons with Disabilities;
- the 2030 Agenda for Sustainable Development adopted on 25 September 2015 by the United Nations General Assembly and its 17 Sustainable Development Goals (SDGs), to which the company Management has linked its Sustainability policies.



ADOPTED PRINCIPLES

The following are the principles adopted by Carpad Spa with reference to the respect of fundamental human rights and basic working conditions:

- **Child labour:** Carpad Spa does not use any form of child labour, refusing the employment of personnel below the minimum age for entering the labour market provided for by the law of the country where the work is carried out;
- **Forced labour:** Carpad Spa rejects all forms of forced or compulsory labour and guarantees working conditions in compliance with applicable laws and regulations. Work performance, both ordinary and extraordinary, is free from any form of physical and/or psychological coercion;
- **Harassment:** Carpad Spa does not tolerate sexual, personal or other forms of harassment or offence. Each Recipient of this document respects the personal dignity, privacy and personality rights of any individual and works with women and men of different nationalities, cultures, religions and races;
- **Discrimination:** Carpad Spa considers unacceptable any form of discrimination intended as a distinction, exclusion or preference having the effect of denying or altering equality of opportunity or treatment in employment or occupation. It is Carpad Spa's objective to consolidate a working environment characterised by the absence of racial, cultural, ideological, sexual, physical, moral, religious or any other kind of discrimination. For Carpad Spa, diversity represents a strategic element for company competitiveness and the development of its people. Carpad Spa believes that teams with different skills, experiences and backgrounds enhance the working environment and stimulate creativity, fostering a more effective leadership style and nurturing an increasingly open corporate culture;
- **Fair and favourable working conditions:** Carpad Spa guarantees a fair remuneration that complies with the minimum wage requirements provided for by collective agreements and reference regulations, promoting active policies to prevent and contrast the gender gap and to support the employment of people with disabilities. Carpad Spa believes that remuneration policies, benefits and working conditions must ensure an adequate standard of living for all workers; for this reason, the Management promotes a working condition in which all employees receive fair and equitable remuneration and benefits according to the type of work performed and the contractual bracket in which they are employed;
- **Freedom of association and collective bargaining:** Carpad Spa recognises to its employees the right of association for the defence and promotion of their interests, as well as the right to be represented by trade unions or other forms of representation, in accordance with the legislation and practices in force provided for by the law of the country where the work is performed.
Collective bargaining is recognised as the privileged instrument for determining the contractual rules and conditions of its employees, as well as for regulating relations between the Company and trade union organisations.
Carpad Spa undertakes to ensure that employees' representatives are in no way penalised or subjected to any form of abuse, discrimination or retaliation.



- Health and safety in the workplace: for Carpad Spa, the protection of the fundamental rights of the individual is essential in any manifestation of social cohabitation, starting from the right to work in environments and conditions suitable to ensure the health and safety of workers. The Management, as indicated in the Environmental Sustainability Policy and the Occupational Safety and Health Policy, is committed to ensuring healthy and safe working conditions and to promoting the dissemination and consolidation of a culture of safety among all workers, including within the supply chain and among all stakeholders. Carpad Spa undertakes to ensure that all activities are planned and carried out so as to preserve workers' health and safety and to provide the highest standards of risk assessment, prevention and management;
- Privacy: Carpad Spa undertakes to respect the right to privacy and the protection of personal data and information of all the entities involved in its business activities, with particular attention to customers and in full compliance with applicable regulations;
- Rights of local communities: Carpad Spa undertakes to respect the rights of the local community of the country in which it operates and to reduce the social and environmental impact of the activities developed in the production sites. The company contributes to the social and economic growth of the community and undertakes to behave in a way that respects the contexts in which it is located and to exert a positive influence on the surrounding areas. Carpad Spa is engaged in building a solid relationship of cooperation with its stakeholders, with the aim of creating long-term value and opportunities for growth and development, as well as promoting open and transparent dialogue and relationships based on mutual trust.

DIVERSITY AND INCLUSION

Non-discrimination, Equal Opportunities and Inclusion permeate the values of Carpad Spa. For these reasons Carpad Spa is committed to:

- creating an inclusive work environment that ensures respect, integrity, personal development and equal opportunities (e.g. training, development, career), not only for current employees, but also for potential employees;
- raising employees' awareness of diversity and equal opportunities within the company, including through the development of training programmes and specific projects on diversity and inclusion;
- complying with regulations and laws on equal opportunities, also with reference to the regulatory framework of the country in which it operates;
- fostering the commitment of all company employees to act with respect and integrity in all relations with colleagues, customers, suppliers and all actors with whom they interact;
- stimulating suppliers' attention to respect for human dignity in the form of non-discrimination and protection of diversity.

DISTRIBUTION

This Policy on Labour Rights and Human Rights confirms the company's commitment to all employees, suppliers, stakeholders at all levels, partners and all those who, in some way, fall within the area of impact of the corporate value chain.

This document must be disseminated and communicated to all levels of the organisation: to this end, an extract of the policy is distributed to each employee; the document is also available to the public outside the organisation by:



- posting it on the "company notice boards" in the various buildings;
- the company website.

APPLICATION

The staff of Carpad Spa are obliged, without exception, to adapt their behaviour to the principles set out in this Policy, both in the workplace and during external events related to work (meetings, social events, business trips).

REPORTS OF NON-COMPLIANCE

Carpad Spa provides appropriate reporting channels in order to improve its ability to identify and analyse the real, or even only potential, impacts on human rights and promptly take appropriate corrective measures, always taking care to ensure the confidentiality of the reporter's identity from the receipt of the communication and in any subsequent contact. Reports can be placed in the company mailbox, forwarded to the attention of the Sustainability Team, at the following address:

- Carpad Spa - Viale dell'Industria 16 - 35014 Fontaniva (PD).

REVIEW

This Policy will be periodically reviewed in order to ensure its adequacy and effective implementation: this review allows its adequacy and effectiveness to be assessed over time, with a view to continuous improvement.

This Policy and subsequent revisions will be subject to the approval of the Board of Directors of Carpad Spa.

Fontaniva (PD), 30.09.2022

CARPAD SPA
C.E.O.

Benetti Andrea



L'Amministratore Delegato
Benetti Andrea

Rev. 00 dated 30.09.2022