

Context

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 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 and field of application

This Policy applies to all the people 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 the principles of this policy with our suppliers.

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 (Zero Tolerance Policy), Ethical Trading Initiative Code, Health and Safety Policy, Environmental Policy, Forest Sustainability Policy, Social Responsibility Policy.

Palladio Group respects fundamental human rights and promotes a corporate culture founded on the highest ethical conduct in all aspects of the business.

We will continue to engage with stakeholders in relation to the evolution of our human rights commitments and programs, with the aim of maintaining full compliance with national laws and zero incidents of human rights violations within our activities.

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, colour, gender, gender identity, disability, sex, nationality, race, religion, sexual orientation, ethnicity, ancestry, pregnancy or any other legally protected characteristic in accordance with applicable laws.

Our annual goal is to have no reports related to equal opportunities discrimination.

- **Health and 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 law 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. We guarantee the absence of forced labour and child 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 mandatory 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, ensuring there are no documented incidents of human rights violations within our operations each year.

- **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.

- **Reporting and whistleblowing**

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). If an employee believes that someone is violating the Human Rights Policy or the law, as provided for in the Code of Ethics, they have the duty to immediately report it to their Manager, Human Resources, or the Ethics Committee through a whistleblowing procedure. In addition, the external figure of the Trusted Advisor (Zero Tolerance Policy) has been established to guarantee anonymity, and therefore activate transparent and secure reporting mechanisms, thus allowing Palladio people to report human rights violations without fear of retaliation.

Governance

Human rights governance is integrated at the Board of Directors, CEO and Management levels as part of the global strategy.

Responsibility

The Ethics Committee of each plant, in collaboration with the Head of Human Resources, is responsible for ensuring compliance with these commitments and our CEO is responsible for supervising their implementation and ensuring that any violations of the Code of Ethics are investigated.

Palladio Group assigns specific responsibilities to managers and people across all business functions to implement and monitor human rights initiatives.

Palladio Group provides specific training to all people to raise awareness of human rights issues and to ensure that they understand the company policy and their responsibilities.

We constantly promote a corporate culture based on respect and promotion of human rights, encouraging ethical and responsible behavior throughout the organization.

Target and Monitoring

The target and monitoring of the Human Rights policy occurs through the annual measurement of KPIs in all company activities, such as compliance with labor standards, wage equity, and workplace safety. The reporting is published in our Sustainability Report.

Review and update

The policy is reviewed and updated at least annually to allow the company to adapt to new social needs, as well as continuously improve its results.

Chief Executive Officer

Ing. Antonio Marchi

