



HUMAN RIGHTS POLICY





“ All human beings are born free
and equal in dignity and rights.
They are endowed with reason and conscience
and should act towards one another
in a spirit of brotherhood.

Art. 1 of the Universal declaration of Human Rights

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OUR PRINCIPLES

Respect for fundamental human rights is an essential element of the way of doing responsible business at Bolton Group. It's a relevant theme for our employees, customers and consumers, as well as for the communities where we operate and the civil society groups with whom we interact.

This document represents a path for our Group on which we will work for continuous improvement with internal and external stakeholders, in order to address the main challenges we have to face.

The **Human Rights Policy** of Bolton Group is directly derived from the core values of the Group as expressed in the Code of Ethics¹. Dignity and respect for the individual are at the heart of our corporate culture. We expect our entire family of suppliers and other relevant stakeholders to adhere to the principles and values contained in this Policy.

We are committed to upholding, to the best of our ability, the internationally recognized human rights, as laid out in the *Universal Bill of Human Rights* and the conventions which it has inspired, such as the *ILO Declaration on Fundamental Principles and Rights at Work*, the *UN Guiding Principles on Business and Human Rights* and the *United Nations Conventions on the Rights of the Child* (UNCRC).

Where national laws and international human rights standards differ, we will follow the higher standard. If they conflict, we will recognize the national laws while respecting human rights to the greatest extent possible and will continue advocating for a positive change.

The structure of this document is inspired by and largely reflects the provisions of the Ethical Trade Initiative (ETI) Base Code, issued by Ethical Trade Initiative, a network of companies, non-profit organizations and trade unions which promotes the respect of workers' rights worldwide.

We will continue working with our suppliers, NGOs and all the relevant civil society actors to improve and reinforce the key elements present in this Policy. Our unwavering goal is to eradicate the violation of human rights wherever possible and respect the internationally recognized human rights as relevant to our operations.

¹ Bolton Group's Code of Ethics is available on Bolton Group's website (<https://boltongroupwecare.it/en/archivio/ethical-code>)



DUE DILIGENCE

We shall monitor the implementation of the Human Rights Policy and Code of Ethics within the Group's activities and shall promote and support adherence to them among our relevant stakeholders and suppliers.

Specific operational instruments, such as Codes of Conduct, risk assessment tools, training sessions and on-site audits, can be developed at Group or BU level in order to allow the implementation of the principles of this Policy and to verify that they are being respected.

We will perform our due diligence by establishing verification and compliance analysis mechanisms both internally and throughout our supply chain. We will utilize universally shared methodologies, guidelines and standards such as the OECD Guidelines for Multinational Enterprises and the ISO 37301 and ISO 37001 standards.

All the evidence gathered during the evaluation phase shall represent an incentive for the Group and its commercial partners to redefine policies, actions and behaviors within a process of continuous improvement. This will allow full compliance to the Human Rights Policy in the framework of our activities.

In the event that any supplier or other relevant stakeholder is facing challenges to adhere to the Policy, we will take the necessary steps to correct the situation if any misalignment has occurred. We will work together with the affected parties and stakeholders to identify the root causes of the problem, find and implement effective ways to correct them and verify their effectiveness in resolving the incident.

We believe in a continuous dialogue with our relevant stakeholders, suppliers, commercial partners, employees and civil society actors to improve the current measures we have in place and to define the new ones which can develop and implement to reinforce our commitment for international human rights respect.





INVOLVED RIGHTS

We respect the following fundamental principles as part of doing responsible business. We are also committed to promoting the respect for human rights within our supply chain by requiring our suppliers, commercial partners and relevant stakeholders to adhere to these principles.

REGULAR AND FREELY CHOSEN EMPLOYMENT

Every employee has the right to join or leave employment freely within the terms of employment. There is no kind of forced, bonded or involuntary prison labor as defined by the reference ILO Conventions and Recommendations.

We provide regular employment, to every extent possible, based on a recognized employment relationship established through national legislation and practice.

We use contractual forms that meet the obligations to employees under labor or social security laws and regulations arising from the regular employment relationship, avoiding the excessive use of unfavorable forms (e.g. labor-only contracting, sub-contracting, apprenticeship schemes without real intent to impart skills or provide regular employment, excessive use of fixed-term contracts of employment, etc.).

Workers shall not be required to lodge “deposits” or their identity papers with their employer. Where lodge of identity papers is legally required, worker’s access to their documents is guaranteed. Workers are not prevented from leaving the workplace and their papers are returned immediately upon cessation of employment.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We respect the right of our employees to be appropriately represented and to freely form and/or join Trade Unions, if existing by law, or workers’ organizations of their own choosing and to bargain collectively.

Where the right to freedom of association and collective bargaining is restricted under law, we will seek ways to respect international human rights standards on freedom of association and collective bargaining, without contravening applicable laws and regulations at country level.



Workers’ representatives carry out their tasks without any consequence of prejudice, isolation, discrimination, harassment, intimidation or retaliation for being union members.

We are committed to establishing a constructive dialogue with the workers’ freely chosen representatives and an open attitude towards their activities, basing all negotiations on mutual respect and good faith.

HEALTH, SAFETY AND WORKING CONDITIONS

We provide a healthy and safe working place and environment for all our staff where the prevailing knowledge of the industry and any relevant specific hazard have been assessed, in compliance with current health and safety legislation. We are committed to keeping safe workplaces, by minimizing the risk of accident or injury and reducing the causes of hazards inherent in the working environment.

We assign responsibilities for health and safety to a formal safety committee or a senior management representative of the facility / company.

We are also committed to involving our staff in the continuous improvement of health and safety conditions of our workplaces in accordance with the local applicable laws and regulations.

We guarantee our employees’ right to access preventive healthcare and to benefit from medical treatment even where conditions established by local laws and practices are limited.

We also must ensure that we provide our employees with regular and recorded training on occupational health and safety and such training is repeated for new or reassigned workers.

Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.





CHILD LABOUR

We do not allow the use of child labour as it is defined by the reference ILO Conventions. We do not employ children under the age of 16 and will not hire children under the local legal age for employment.

All policies and procedures shall conform to the provisions of the relevant ILO standards related to child labour. In case of direct or indirect child labour, we will take immediate action to identify and provide a remediation programme for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

Furthermore, we are committed to guaranteeing a suitable position for employees under the age of 18 as specified in the relevant ILO Conventions. This will prohibit them from working under hazardous conditions, work that is harmful to physical and mental development or working at night.

LIVING WAGES

We offer remuneration that meets the national legal standards and industry benchmark standards, whichever is higher. In any case, we are committed to creating favorable conditions for enabling living wages for workers to maintain a decent standard of living to meet the basic needs of the workers and their families and to provide some discretionary income to reach a living wage, when national legal standards do not provide for such an opportunity.

We provide written and understandable information about employment conditions and particulars of wages each time they are paid, in a language understood by workers and, if required, explained verbally.

Withholdings from wages which have a legal basis will be applied in line and within the limits provided by local applicable law and/or collective agreements. Withholdings from wages not covered by local applicable law and/or collective agreements will be set out in a company Policy and will be set out in the employment contract signed by the employee or by explicit arrangement with the worker in a clear agreed basis.



Any disciplinary measure must be set in accordance with local laws or regulations, or collective agreements, with the expressed permission of the worker concerned and should be recorded.

In order to go beyond the trade-off between living wages and deductions as a disciplinary measure and to establish a limit on a local basis for this type of action, we will perform an analysis to establish a measurement and quantify living wages at local level.

All deductions should in all cases be sufficient to ensure a living wage for the workers concerned and their families.

WORKING HOURS²

We are committed to respecting weekly working hours provided for by the local legislation and collective agreement and to not exceed what is established by the ILO Conventions on this matter.

Overtime shall be agreed and used responsibly, not to replace regular employment. Overtime shall be voluntary and compensated at a minimum rate of 125%, as suggested by ILO Conventions and, in any case, always aligned with local laws and collective bargaining agreements.

Leave of absence in lieu of overtime payment for all workers shall only be permitted where agreed through a collective bargaining process.

The regular working week shall not exceed 48 hours, except in exceptional circumstances. The sum of regular and overtime hours in a week shall not exceed 60 hours, except in extraordinary circumstances where all of the following are met:

- this is allowed by national law and by a collective agreement freely negotiated with a workers' organization representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety;
- the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

Adequate rest periods for the workers must be respected, granting at least one day off in any 7 day period or two days off during any 14 day period.

² For Working Hours principle related to sea workers, the commitments to comply with are those set forth in the ILO 188C art 13 and 14: Manning and hours of rest.





DISCRIMINATION AND HARSH TREATMENT

We respect diversity and the right to equal opportunities. We do not tolerate any form of discrimination of race, colour, age, gender, language, religion, nationality, political opinion, sexual orientation, sexual disease status, caste or social status, marital status, union membership or political affiliation and we encourage the promotion of an ethical conduct within the workplace. There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement.

We are committed to promoting and respecting gender equity including closing the gender pay gap, respecting maternity and paternity rights, ensuring equal access to training and promotion etc.

In the same way, we prohibit and do not tolerate any form of corporal punishment, mental or physical coercion, verbal abuse, sexual or psychological harassment, or harsh and inhumane treatment, as well as threats and intimidation at the workplace at large (offices, plants, vessels, journey to/from work, etc.).

RIGHTS OF LOCAL POPULATION

We conduct our activities while respecting the rights of the local communities inhabiting the areas where we operate with our plants. We pay attention to the most vulnerable local communities, listening to their needs and providing opportunities and channels to communicate their needs and concerns at the local level.


REPORTING BREACHES

We are committed to implement our own appropriate, secure and confidential reporting tools to report grievances, human rights or labor rights violations or any other kind of breaches of the principles set forth in this Policy, aligned with the UN Guiding Principles. These mechanisms and reporting tools shall be made known to all employees and direct commercial partners. We are committed to verifying that all people involved in our supply chains have access to adequate grievance mechanisms and communication channels. Retaliation for raising concerns in good faith will not be tolerated.

¹ Bolton Group's Code of Ethics is available on Bolton Group's website (<https://boltongroupwecare.it/en/archivio/ethical-code>)



PARTNERSHIP WITH OXFAM

 This document has been prepared with the support of Oxfam, providing us with its expertise as part of our partnership on the protection of human rights.

FINAL REMARKS

The Bolton Group Board, with resolutions duly adopted unanimously, approved this Human Rights Policy on September 19, 2022.

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