

POLICY ON THE SAFEGUARDING AND PROTECTION OF HUMAN RIGHTS

One of the fundamental principles of Carcano Antonio SpA is the recognition of human capital and the protection of the dignity of all those who work in its value chain.

Carcano acts in compliance with universally recognised human rights as essential and inalienable values of its culture and corporate strategy.

This Policy reinforces what has already been stated in the Code of Ethics, in compliance with the Sustainability Model outlined by the United Nations Global Compact, which is already contained in the Carcano Social Responsibility Policy.

Carcano respects and protects the fundamental human rights set out by the laws and current legislation, inspired by the International Charter of Human Rights of the United Nations; the Convention on the Rights of children and adolescents of the United Nations; the Fundamental Labour Conventions of the International Labour Organization (ILO); the European Convention on Human Rights and the United Nations Convention against Corruption.

Our Principles:

- **Non-discrimination:** Carcano opposes any form of direct or indirect discrimination based on gender, marital status, sexual orientation, religious or political belief, trade union membership, skin colour, ethnic origin, nationality, age, background and social status, or physical and mental disability.
- **Freedom of association:** Carcano recognises the right of its workers to freely form trade union associations and the right to collective bargaining and, in this sense, openly and constructively dialogues with the workers' union representatives.
- **Refusal of forced, bonded and compulsory labour:** Carcano opposes all forms of exploitation of workers, including child labour, and forced and compulsory labour, as well as any form of abuse or psychological and physical coercion towards its workers and strongly condemns the trafficking and exploitation of human beings in all its forms.
- **Adequate working conditions:** Carcano promotes a working environment based on trust, dialogue and mutual respect and protects the wellbeing of its workers and the balance between private and professional life, ensuring decent economic conditions and sustainable working hours.
- **Occupational Health and Safety:** Carcano considers the health and safety of workers a

Carcano Antonio Sp.A.

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Converting Production Unit
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23014 Andalo Valtellino (SO) - ITALY

Rolling Production Unit
Via Stelvio, 5 | 23014 Delebio (SO) - ITALY

Bureau Veritas certified Company:

ISO 9001:2015 | ISO 14001:2015 | ISO 50001:2011 | FSSC 22000 (Andalo V.no Unit)
ASI Performance Standard

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fundamental value and takes a proactive role in maintaining a safe and healthy working environment, adopting high standards of prevention, assessment and management of related risks, as well as constantly promoting and encouraging a corporate culture oriented towards health and safety in the workplace.

- **Integrity:** Carcano rejects all forms of corruption in the belief that corrupt activities also adversely affect human rights.
- **Privacy:** Carcano respects and protects the privacy and security of personal information and employees, suppliers and customers in compliance with the laws in force regarding the protection of personal data.

Carcano is constantly engaged in identifying, evaluating, preventing and mitigating the risks of violation of human rights, promptly implementing the necessary remedial actions, should such events occur. In particular:

- It raises the awareness of its workers through information and training so that they conduct company activities in compliance with human rights.
- Suppliers and customers are also expected to take appropriate measures and actions.

Management and Monitoring:

Carcano verifies the effectiveness of the approach adopted mainly through dedicated tools, which consist of a written reporting system (codice.etico@carcano.com) for violations and a sanctioning system.

The Management periodically reviews its Social Responsibility Policy in order to guarantee its adequacy over time; it ensures that it is disclosed to all staff working within the organisation or on its behalf and that it is made available to stakeholders.

The Policy is disseminated through publication on the company website, and is also displayed on company notice boards and in the staff training area.

With the aim of extending the validity of its principles also outside Carcano, the Company requires all suppliers to accept the Code of Ethics and the General principles of this Policy.

CEO

Alberto De Matthaeis

Mandello del Lario, 15 October 2020

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