



HUMAN RIGHTS POLICY

Approved by the Board of Directors of [SINELEC S.p.A.](#) on [25 february 2021](#)

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CONTENTS

1. HUMAN RIGHTS POLICY	2
1.1. Purpose.....	2
1.2. Internal and External References.....	2
1.3. Recipients and Scope of Application.....	2
2. PRINCIPLES	3
2.1. Human Resources	3
2.2. Business Partners and Suppliers	4
2.3. Community.....	4
3. IMPLEMENTATION, CONTROL AND MONITORING	5
3.1 Stakeholder Involvement.....	5
3.2. Reporting Violations.....	5
3.3. Disciplinary System.....	5
4. APPROVAL, DISSEMINATION AND MONITORING OF THE POLICY	5
5. GLOSSARY	6



SINELEC requires the utmost respect for people and labour laws and strongly prohibits undeclared, forced or compulsory and child labour. The Company aims to create an employment relationship where respect for the individuals, their dignity and their values is constantly taken into consideration, rejecting any form of discrimination.

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1. HUMAN RIGHTS POLICY

1.1. Purpose

SINELEC S.p.A. ("SINELEC" or the "Company") and its subsidiaries are committed to respecting, protecting and promoting Human Rights when conducting their business. In this regard, this Human Rights Policy (the "Policy") establishes the principles and the rules of conduct for SINELEC employees and collaborators in relation to Human Rights, also according to the provisions of the SA8000: 2014 Standard (Social Accountability).

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When conducting its business, SINELEC strives to prevent any behaviour, act or decision that could cause, or contribute to cause a negative impact on Human Rights. The Company promotes the respect for Human Rights in its relationships with its employees, contractors, business partners and suppliers.

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SINELEC promotes the adoption of the principles enshrined within this Policy by anyone who enters into a relationship with the Company with particular attention to those circumstances related to greater risks to human rights.

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1.2. Internal and External References

In line with all the regulations of the countries where SINELEC operates, this Policy is complementary to the principles set out in the company's Code of Ethics and Conduct (the "Code of Ethics"), its Organisation, Management and Control Model pursuant to Italian Legislative Decree no 231/2001 ("Model 231") and the other current procedures and policies,

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The Policy is based on international standards, such as the Universal Declaration of Human Rights and the Fundamental Conventions ("Conventions") of the International Labour Organisation (ILO), the Declaration of the ILO on the fundamental principles and rights at work and its follow-up, the United Nations Guiding Principles on Business and Human Rights, the Principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the SA8000: 2014 Standard.

1.3. Recipients and Scope of Application

This Policy applies to SINELEC. Specifically, the "Recipients" of this policy are the members of the Board of Directors and other Corporate Bodies, employees, collaborators, consultants (including any commercial intermediaries), suppliers (including subcontractors) as well as the Company's business partners with whom it has established business relationships or who work in the name of or on behalf of the Company for any reason and regardless of the type of contractual relationship (the "Recipients").

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2. PRINCIPLES

2.1. Human Resources

Employees' Selection, Recruitment and Management

SINELEC does not tolerate any form of discrimination or the use of coercion, deception or lack of transparency in its employee selection and recruitment processes.

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SINELEC is committed to managing the employment relationship with its employees by guaranteeing respect for their dignity and rights as individuals and therefore will never request contributions of any kind at any step in the selection and recruitment process and will not keep employees' identification documents in order to hold them against their will.

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Undeclared, Child, Forced and Compulsory Labour

SINELEC requires the utmost respect for people and applicable labour laws and strongly condemns human trafficking, undeclared, child, forced and compulsory labour. SINELEC is committed to fully complying with the specific ILO Conventions or, where stricter, the applicable labour laws of each country where the Company operates.

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SINELEC also strives to ensure that all its employees and collaborators under the age of 18 work in age-appropriate roles, as defined by ILO Convention no. 182 and by SA 8000: 2014 standard.

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Health and Safety at Work

The health, safety and well-being of employees are extremely important to the Company.

SINELEC is committed to maintaining a safe working environment that is free from all forms of violence, harassment or intimidation. Furthermore, the Company constantly promotes high standards to protect employees' health and safety, thereby minimising the risk of accidents, injuries and exposure to related risks.

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SINELEC strives to ensure that all its operating sites comply with the health and safety laws of the countries where they are located and respect standards that comply with international regulations and best practices.

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The Company promotes the spread of a culture of safety in the workplace, encouraging responsible behaviour from its employees and collaborators, also by providing training and informational activities.

SINELEC strives to collaborate with its employees to improve health and safety conditions in the workplace, including identifying hazards and resolving health and safety issues and adopting all the necessary precautionary measures.

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Diversity and Inclusion

The Company recognises that people are the most important resource and strives to guarantee equal opportunities at every stage of the employment relationship. In particular, SINELEC commits to preventing any form of discrimination and promoting a culture in which people recognise the value that a diverse and inclusive workforce brings from the selection process to the assignment of roles, professional development and the resolution of the working relationship.

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SINELEC does not tolerate any form of discrimination based on ethnicity, race, skin colour, gender, sexual orientation, religion, nationality, age, disability, political opinion, trade union membership, marital status, health status or any other social status or personal trait.

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Working Hours, Wage Conditions and Benefits

SINELEC fully complies with local laws and international industry standards with regard to working hours, wage conditions, insurance and social security provisions, overtime and benefits of its employees.

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Working hours are established in accordance with local legislation and in full compliance with the provisions established by the ILO Conventions on the subject and, where applicable, with particular regard for the regulations set forth by national collective bargaining agreements and their amendments. Employees and collaborators enjoy a minimum of one day off every week and paid holidays, permitted leaves and sick days.

Freedom of Association and Collective Bargaining

SINELEC guarantees, without any distinction, all its employees the right to form and to join an organisation of their choosing, without any prior authorisation.

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If employees choose to do so, SINELEC also guarantees that their terms and conditions of employment shall be established through voluntary collective bargaining, in accordance with ILO Conventions and the local legislation of the countries in which the Company works and, where applicable, by national collective bargaining agreements and their amendments.

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Privacy

SINELEC is committed to respecting the privacy of its employees, avoiding to disclose personal data and information to third parties, according to the applicable law. Additionally, the Company undertakes to manage the data and information properly, in compliance with the relevant current legislation.

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2.2. Business Partners and Suppliers

SINELEC commits not to establish business relationships with suppliers using forms of undeclared, compulsory, forced or child labour or, more generally, not meeting the requirements established in this Policy.

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2.3. Community

Stakeholder Engagement

Recognising its role within the communities where it operates, SINELEC strives to engage with its stakeholders in order to ensure their needs to be taken into consideration while conducting its business.

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The Company is committed to maintaining open and constructive dialogue with its stakeholders on a regular basis.

SINELEC also undertakes to create economic opportunities and to promote the well-being of the communities where it operates through initiatives that are relevant for the local area, with a particular focus on vulnerable or disadvantaged groups.

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The Rights of Indigenous and Tribal Peoples

The Company is committed to respecting the rights, culture, traditions and customs of the indigenous and tribal peoples who live in the countries where SINELEC operates, by paying particular attention to the communities that are the most vulnerable due to economic, social, environmental or other reasons.

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3. IMPLEMENTATION, CONTROL AND MONITORING

3.1 Stakeholder Involvement

The Human Rights Policy is communicated to all internal and external stakeholders through proper communication tools. SINELEC also reports on the activities carried out to promote Human Rights in its Sustainability Report on a year basis in order to inform and raise awareness amongst its stakeholders and disclose the results achieved in the relevant area.

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Lastly, specific training plans on this Policy are to be delivered in order to ensure that it is correctly understood and respected.

3.2. Reporting Violations

All Recipients are required to report any alleged or actual violation of Human Rights they become aware of during their work activities or any other violation or suspected violation of the Policy.

In this regard, special communication channels have been set up in accordance with the Company's Code of Ethics.

The Company will assess the reports it receives and handle them, ensuring the highest level of confidentiality of the whistleblowers. Those reporting in good faith are protected from any form of retaliation, discrimination or penalty. The identity of the whistleblower will always remain confidential, without prejudice to legal obligations and the protection of the rights of the Company or persons wrongly accused and/or accused in bad faith.

3.3. Disciplinary System

SINELEC strives to identify, assess, prevent and mitigate the risks of Human Rights violations by promptly taking appropriate action to remedy the situation should any events occur.

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Compliance with this Policy is an integral part of employees' contractual obligations and, more generally, of all Recipients. Any violation will therefore lead to the application of the measures laid out in the law and collective bargaining.

Failure to comply with the Policy by external parties may result in the termination of the contract, assignment or, more generally, the existing relationship with the Company, as well as compensation for damages, where specific conditions are met.

4. APPROVAL, DISSEMINATION AND MONITORING OF THE POLICY

The Policy is made available to all Stakeholders and can be consulted on the Company's website.

SINELEC approves this Policy by resolution of the Board of Directors and promotes its adoption by all its subsidiaries, which will independently adopt this document by resolution of their own administrative bodies and promote its timely adoption by their respective subsidiaries.

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SINELEC and its subsidiaries commits to encourage the adoption of this document by companies in which it holds a non-controlling stake (including joint ventures).

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In cases where local law or customs impose higher standards than those set out in this Policy, local laws and customs must always be applied. If, on the other hand, the Policy provides for a more restrictive standard, the latter prevails.



This Policy is subject to regular review when national and international regulations are amended or supplemented or as a result of court rulings or interpretations or whenever necessary.

Aiming for continuous improvement, SINELEC commits to monitor any development, both internally and externally, in the countries where it operates which could affect this Policy, to implement any appropriate action and to constantly evaluate its performance with respect to this Policy and relevant best practices.

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5. GLOSSARY

Undeclared Work

Undeclared work (or “unreported employment”) is any work that is carried out, fully or partially, without an official contract or tax contributions (and, therefore, social security, pension and insurance provisions) or in violation of the law concerning, for example, working hours that do not comply with the regulations.

Child Labour

Specifically, in compliance with ILO Convention no. 138, the term “child” defines individuals younger than the age at which compulsory schooling ends and, in any case, anyone younger than 15.

Forced or Compulsory Labour

In compliance with ILO Convention no. 29 and the SA8000: 2014 standard, “forced or compulsory labour” is defined as any work or service that a person has not volunteered to do so and that is performed under threat of punishment or retaliation or that is required as a form of payment of a debt.

Indigenous and Tribal Peoples

In compliance with the definition in ILO Convention no. 169, the “Rights of indigenous and tribal peoples” principle applies to:

- tribal peoples who, in independent countries, are distinguished from other members of the national community in terms of their social, cultural and economic conditions and who are governed, in whole or in part, by their customs or traditions, or by special legislation;
- peoples who, in independent countries, are considered to be indigenous because they have descended from populations that used to inhabit the country or a geographical region to which the country belongs at the time it was conquered, was colonised or the current borders of the state were established, and who retain their social, economic, cultural and political institutions, or some of the same, no matter their legal status.

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