



Human Rights Policy

*Turning brass into reliable solutions that support industry,
drive progress, and enhance people's well-being*



INDEX

	PREMISE	3
	GNUTTI GROUP'S COMMITMENT TO RESPECTING HUMAN RIGHTS	3
01	SCOPE AND FRAMEWORK	3
	RECIPIENTS	3
	INTERNATIONAL CONVENTIONS, PRINCIPLES AND GUIDELINES	3
02	PRINCIPLES	4
03	RESPECT FOR HUMAN RIGHTS IN THE VALUE CHAIN	5
04	REPORTING VIOLATIONS AND SANCTIONING CONSEQUENCES	5
	REPORTING VIOLATIONS	5
	SANCTIONING CONSEQUENCES	5
05	ROLES AND RESPONSIBILITIES	6
06	DISSEMINATION, TRAINING AND MONITORING	6
07	APPROVAL AND REVIEW	6

PREMISE

GNUTTI GROUP'S COMMITMENT TO RESPECTING HUMAN RIGHTS

Gnutti Group (hereinafter also "Group") is firmly convinced that respect for human rights should not be a formal operation, but a tangible and continuous commitment.

Gnutti Group means the companies controlled by Gnutti Cirillo S.p.a. (the parent company) and the companies subject to management and coordination.

Gnutti Group recognizes the equal dignity of every human being and is committed to contributing to the well-being of individuals and the communities in which it operates, in accordance with the United Nations Guiding Principles on Human Rights. This vision represents a fundamental component of the Group's corporate culture and operating strategy, reflecting its approach to business and helping to integrate the Group's sustainable development goals with the United Nations 2030 Agenda.

The professionalism of Gnutti Group is based on the value of people, an irreplaceable and precious asset of efficiency. For Gnutti Group, putting people at the center means caring about people's health and safety, valuing diversity, inclusion and condemning all forms of discrimination.

Human dignity is an indispensable value.

Gnutti Group is committed to collaborating actively with national authorities and government bodies to promote the implementation of their respective human rights agendas.

Gnutti Group is firmly convinced that its ESG commitments must necessarily include respect for human rights. These values are not only an integral part of the Group's corporate culture, but they also represent an essential foundation for its long-term success. The Group's vision is to create an inclusive and respectful work environment, where every individual can contribute and thrive.

With this in mind, Gnutti Group has adopted this Human Rights Policy (hereinafter also the "Policy"), the purpose of which is to establish its position on the respect for human rights of all those who, directly or indirectly, are involved in the activities carried out by the Group. The commitments and values outlined in the Policy are central to the Group's corporate culture and form the basis of the principles of corporate integrity that also inspire the Group's Code of Ethics, the provisions of which must also be observed.

01

SCOPE AND FRAMEWORK

RECIPIENTS

Gnutti Group is committed to respecting and promoting human rights in all its activities and it expects its business partners to adopt similar practices. This commitment extends not only to the activities carried out directly by the Group, but also to those carried out in its interest by third parties, thus ensuring a consistent approach throughout the value chain.

Therefore, the recipients of this Policy (the "Recipients") and, as such, obliged to comply with its contents, are all members of the administrative and control bodies of the Group companies, employees and collaborators, suppliers, consultants, distributors, commercial partners and in general anyone who has a business relationship with the Group, regardless of the legal nature of the relationship.

All Recipients are required to be aware of the contents of the Policy and to actively contribute to its implementation. Any violations may be sanctioned within the terms indicated in paragraph 4.

INTERNATIONAL CONVENTIONS, PRINCIPLES AND GUIDELINES

This Policy has been drawn up taking into consideration the international standards and conventions on human rights that inspire Gnutti Group in carrying out its activities and in particular:

- the International Charter of Human Rights of the United Nations ("UN"):
 - Universal Declaration of Human Rights (1948);
 - International Covenant on Civil and Political Rights (1966);
 - International Covenant on Economic, Social and Cultural Rights (1966);
- the UN Guiding Principles for Business and Human Rights (2011);

- the principles of the United Nations Global Compact (2000);
- the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work (1998);
- the ILO Fundamental Labour Conventions: No. 29 (forced labour - 1930); no. 87 (trade union freedom - 1948); no. 98 (right to collective organization and bargaining - 1949); no. 100 (equal pay - 1951); no. 105 (abolition of forced labour - 1957); no. 111 (discrimination - 1958); 138 (minimum age - 1973) and 182 (child labour - 1999);
- the United Nations Convention on the Rights of the Child (1989);
- the Principles of Women's Empowerment (WEP-2010);
- the Dhaka Principles for Migration with Dignity (2012);
- the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises (2023).

02

THE PRINCIPLES

Gnutti Group is committed to respecting universally recognized human rights and in particular:

- **Promotion of diversity and elimination of all forms of discrimination** in respect of employment and occupation. Gnutti Group does not discriminate on the basis of gender, religion, nationality, ethnicity, political opinions, sexual orientation, social status, disability or age or any other individual characteristic. Gnutti Group is a global group with an international vision and it recognizes that different people, countries and cultures bring value and success to corporate competitiveness globally. Valuing cultural, age and gender differences as an asset is an essential part of the Group's identity and of the culture of inclusiveness that guides behaviour by ensuring respect, equal treatment and opportunities for all those who interact with Gnutti Group.

- **Freedom of association and recognition of the right to collective bargaining.** Gnutti Group explicitly prohibits any form of discrimination against workers' representatives, allows non-employee trade union representatives access to the company and maintains a neutral position regarding the choice of employees to join a trade union organization, to remain a member, to change organization or to terminate their relationship.

- **Elimination of all forms of forced or compulsory labour and all forms of modern slavery.** Gnutti Group prohibits all forms of forced labour, compulsory labour, or labour performed under the constraint of the repayment of a debt as well as any form of modern slavery, including human trafficking and in general any form of work under conditions of psychological or physical coercion. No worker may be forced to deposit personal documents, money or deposits, and everyone must be free to terminate the employment contract without retaliation.

- **Abolition of child labour.** Gnutti Group condemns all forms of exploitation of child labor. Only workers who have reached the minimum age required by current legislation for the type of placement can be employed.

- **Dignity and equity of wages.** For Gnutti Group, wages must comply with the provisions of the legislation or collective bargaining, also with reference to the recognition of overtime and benefits. Wages must also be paid according to the logic of impartiality, equal opportunities and meritocracy, avoiding forms of discrimination and ensuring a decent standard of living.

- **Safety in the workplace.** Gnutti Group promotes safe and healthy working environments and the training of workers as a tool to raise awareness about the culture of safety in the workplace, in order to make people aware of the occupational risks related to their activities and, consequently, responsible for the correct behaviour to be assumed.

- **Promotion of work-life balance.** Gnutti Group requires compliance with the applicable regulations on working hours and leave, with the aim of ensuring a balance between work and personal needs.

- **Professional growth.** Gnutti Group is committed to ensuring meritocracy in the development and professional growth of its staff, without any discrimination, enhancing the knowledge and professionalism of each one.

- **Protection of personal data and protection of personal freedoms.** Gnutti Group recognises the right to protection of the personal data of those with whom it interacts, both inside and outside the Group. Personal data must be processed in compliance with all relevant regulations and protected from unauthorized access. No one should suffer arbitrary

interference in their private life or suffer injury to their honour and reputation.

- **Respect for the environment and for the rights of local communities.** Gnutti Group is aware that respect for human rights also passes through respect for the environment. Protecting the environment, natural resources and biodiversity, minimizing emissions and waste of resources, means respecting people. Gnutti Group is committed to recognizing the rights of local communities and contributing to their economic and social growth, minimizing the negative impacts of its production sites.

- **Combating violence, harassment and mobbing.** Gnutti Group is committed to maintaining a work environment free from all forms of physical, psychological or verbal violence and harassment, also implemented with digital tools, or from attitudes recognizable as mobbing practices that are all, without exception, prohibited.

03

RESPECT FOR HUMAN RIGHTS IN THE VALUE CHAIN

Gnutti Group requires respect for human rights throughout the value chain.

Suppliers, consultants, distributors, commercial partners and anyone who has a business relationship with the Group must read this Policy, contractually committing themselves to compliance with the principles and rules of conduct contained therein and actively promoting its dissemination among their employees and collaborators. At the same time, the Group is committed to working with its customers to ensure the protection of human rights and prevent any form of violation throughout the supply chain.

04

REPORTING VIOLATIONS AND SANCTIONING CONSEQUENCES

REPORTING VIOLATIONS

Recipients must promptly report any actual or suspected violation of this Policy. Reports must be sent to the e-mail address gnutticirillo@gestore-segnalazioni.it and must be based on precise and consistent elements, as well as being circumstantial and detailed. The same will be evaluated by the offices in charge, taking, if necessary, the most appropriate actions as described in the following paragraph.

The utmost confidentiality of the identity of the whistleblowers, the reported and the content of the report in general will be guaranteed, in order to avoid retaliatory attitudes or any other form of discrimination or penalization against the subjects involved.

SANCTIONING CONSEQUENCES

Compliance with this Policy must be considered an essential part of the contractual obligations of Gnutti Group's personnel. Any violations may therefore result in the application of disciplinary measures in accordance with applicable legislation, with all legal consequences also with regard to the preservation of the employment relationship and any compensation for damages deriving from the violation itself.

Compliance with the principles of this Policy is also an essential part of the contractual obligations assumed by all those who have business relationships with Gnutti Group. Consequently, the violation of the Policy may constitute a breach of contract, with all legal consequences with regard to the termination of the contract and the consequent compensation for the resulting damages.

05

ROLES AND RESPONSIBILITIES

Gnutti Group has assigned to the “ESG Strategic Committee” of Gnutti S.p.A. the role of steering and control body for policies on the protection of human rights within the Group. These policies are promoted and developed by the “Human Resources” and “ESG – Sustainability” offices of the Parent Company.

Group companies will adopt this Policy by promoting its principles, commitments and objectives. Each company will ensure its correct and constant application, specific staff training and monitoring, in collaboration and coordination with the “ESG – Sustainability” Office of the Parent Company.

06

DISSEMINATION, TRAINING AND MONITORING

Gnutti Group considers information and awareness-raising activities on the contents of this Policy as key elements of its commitment to respecting human rights.

To this end, it works to promote and disseminate knowledge of the contents of the Policy, guaranteeing adequate training of company staff on its contents and ensuring that third parties are aware of it, through publication on the Group’s website (www.gnuttigroup.com) and on the companies’ websites.

In addition, Gnutti Group shares this Policy with the Group’s human resources managers, to further strengthen the related training programs and to ensure its delivery to newly hired personnel.

If you have any doubts or need clarification regarding the contents of this Policy, you can send an email to: esg@gnutticirillo.it

The “ESG – Sustainability” Office periodically verifies compliance with the Policy by all Recipients and the consistency of the Group’s control system in preventing human rights violations through reports at least once a year.

07

APPROVAL AND REVIEW

This Policy is approved by the Board of Directors of Gnutti Cirillo S.p.A. Any changes will be promptly brought to the attention of the Group companies for appropriate adoption by their respective administrative bodies.



www.gnuttigroup.com - info@gnuttigroup.com

